

August 8, 2019

Lyndon Jordan, III, MD (Chair), Technology and Equipment Committee  
North Carolina State Health Coordinating Council  
c/o NC Division of Health Service Regulation  
Healthcare Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, NC 27699-2704  
[DHSR.SMFP.Petitions-Comments@dhhs.nc.gov](mailto:DHSR.SMFP.Petitions-Comments@dhhs.nc.gov)

Re: Support Petition for Adjusted Need Determination for a Positron Emission Tomography Scanner  
in HSA V. (Robeson County)

Dear Dr. Jordan and members of the Committee:

NCHA represents 130 hospitals and health systems in North Carolina, and we thank you for the opportunity to comment on the Petition received by the State Health Coordinating Council from Southeastern Regional Medical Center d/b/a Southeastern Health. Southeastern has submitted a written petition requesting an adjustment to the need determination in the North Carolina Proposed State Medical Facilities Plan. The petition is submitted due to unique or special attributes of a particular geographic area or institution that give rise to resource requirements that differ from those provided by application of the standard planning procedures and policies.

Southeastern currently provides Positron Emission Scanning (PET) through a vendor-owned mobile scanner that is available only one half-day per week. As a petitioner for a *major cancer treatment facility* it provided over 7800 (ESTV) procedures on one linear accelerator last year and is expecting approval of a second linear accelerator this year. Southeastern further reports that it will soon reach the “Comprehensive Community Cancer Center” designation by the American College of Surgeons’ Commission on Cancer, an indicator of a successful oncology program. Southeastern is also the only provider of open-heart surgery services without full time PET imaging. Recent growth in cardiology applications for PET are indicative that Southeastern will meet the SMFP-established requirements for a “qualified applicant” for PET equipment.

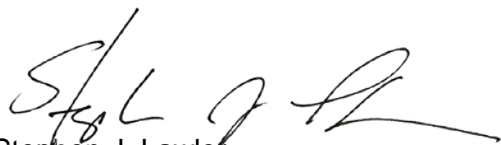
Southeastern’s petition also discusses high incidence rates in the area for several oncology and cardiac based diseases, and notes that additional indications for PET imaging are on the forefront. Nevertheless, the standard need methodology is unlikely to indicate need for a program with only part time access to the equipment.



NCHA supports the petition filed by Southeastern Regional Medical Center to establish need for one unit of fixed PET Imaging equipment in the planning area.

We thank you for your consideration of our comments and ask that you please contact Mike Vicario ([mvicario@ncha.org](mailto:mvicario@ncha.org)) or me if you have questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "S. J. Lawler", written in a cursive style.

Stephen J. Lawler  
President  
North Carolina Healthcare Association

Cc: Christopher Ullrich M.D., SHCC Chair