

**COMMONWEALTH OF VIRGINIA**

**APPLICATION FOR A**

**MEDICAL CARE FACILITIES CERTIFICATE OF PUBLIC NEED**

**(CHAPTER 4, ARTICLE 1:1 OF TITLE 32.1,**

**SECTIONS 32.1 – 102.1 THROUGH 32.1 – 102.12 OF**

**THE CODE OF VIRGINIA OF 1950, AS AMENDED)**

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**OUTPATIENT FACILITIES**

**COPN Request No. VA-8768**

**UVA Health Outpatient Imaging Gainesville**

**Establish a Specialized Center for  
Outpatient MRI Services  
with One Relocated MRI Unit  
in Planning District 8**

SECTION I                      FACILITY ORGANIZATION AND IDENTIFICATION

- A.    **UVA Health Outpatient Imaging Gainesville (“Imaging Gainesville”)**  
Official Name of Facility

**7454 Limestone Drive**  
Address

**Gainesville**                                      **Virginia**                                      **20155**  
City    State    Zip

**703-369-8604 (temporary during construction; permanent telephone number TBD)**  
Telephone

- B.    **UVA Outpatient Imaging Centreville, LLC d/b/a UVA Health Outpatient Imaging Gainesville**  
Legal Name of Applicant

**8700 Sudley Road**  
Address

**Manassas**                                      **Virginia**                                      **20110**  
City    State    Zip

- C.    Chief Administrative Officer

**Donna Staton**  
Name

**501 Sunset Lane**  
Address

**Culpeper**                                      **VA**                                      **22701**  
City    State    Zip

**540-829-8803**  
Telephone

- D.    Person(s) to whom questions regarding application should be directed:

**Donna Staton**  
Name

**501 Sunset Lane**  
Address

Culpeper VA 22701  
City State Zip

540-829-8803 DYS2R@uvahealth.org  
Telephone Facsimile

**and**

**Jamie Baskerville Martin and Jennifer L. Ligon**  
Name

**Williams Mullen, 200 South 10<sup>th</sup> St., Suite 1600**  
Address

Richmond VA 23219  
City State Zip

(804) 420-6407 (804) 420-6507 [jbmartin@williamsmullen.com](mailto:jbmartin@williamsmullen.com)  
Telephone Facsimile E-mail

(804) 420-6423 (804) 420-6507 [jligon@williamsmullen.com](mailto:jligon@williamsmullen.com)  
Telephone Facsimile E-mail

E. Type of Control and Ownership (Complete appropriate section for both owner and operator.)

Will the facility be operated by the owner? Yes X No \_\_\_\_\_

Owner of the Facility Proprietary Operator of Facility  
(Check one) (Check one)

(1) \_\_\_\_\_ (1) Individual (1) \_\_\_\_\_

(2) \_\_\_\_\_ (2) Partnership-attach copy of Partnership Agreement and receipt showing that agreement has been recorded (2) \_\_\_\_\_

(3) \_\_\_\_\_ (3) Corporate-attach copy of Articles of Incorporation and Certificate of Incorporation (3) \_\_\_\_\_

(4) \_\_\_\_\_ (4) Other \_\_\_\_\_ Identify (4) \_\_\_\_\_

(5) \_\_\_\_\_ (5) Corporation-attach copy of Articles of Incorporation and Certificate of Incorporation (5) \_\_\_\_\_

(6) \_\_\_\_\_ (6) Other LLC Identify (6) \_\_\_\_\_

See **Attachment I.E.6 – Certificate and Articles of Restatement, Amended and Restated Articles of Organization, and Fictitious Name Certificate.**

(7) \_\_\_\_\_ (6) State (7) \_\_\_\_\_

(8) \_\_\_\_\_ (8) County (8) \_\_\_\_\_

(9) \_\_\_\_\_ (9) City (9) \_\_\_\_\_

(10) \_\_\_\_\_ (10) City/County (10) \_\_\_\_\_

(11) \_\_\_\_\_ (11) Hospital Authority or  
Commission (11) \_\_\_\_\_

(12) \_\_\_\_\_ (12) Other \_\_\_\_\_ Identify (12) \_\_\_\_\_

F. Ownership of the Site (Check one and attach copy of document)

- (1) \_\_\_\_\_ Fee simple title held by the applicant  
(2) \_\_\_\_\_ Option to purchase held by the applicant  
(3) \_\_\_\_\_ leasehold interest for not less than \_\_\_\_\_ years  
(4) X \_\_\_\_\_ Renewable lease, **10-year initial term**, renewable every  
\_\_\_\_\_ **5** years (**two 5-year renewal options**)  
(5) \_\_\_\_\_ Other \_\_\_\_\_ Identify

See **Attachment I.F – Lease Documentation.**

G. Attach a list of names and addresses of all owners or persons having a financial interest of five percent (5%) or more in the medical care facility.

**UVA Outpatient Imaging Centreville, LLC, d/b/a UVA Health Outpatient Imaging Gainesville (“Imaging Gainesville”), is a wholly owned subsidiary of UVA Prince William Health System (“PWHS”).**

**PWHS is comprised of UVA Prince William Medical Center (“PWMC”), UVA Haymarket Medical Center (“HAMC”), UVA Health Outpatient Imaging Centreville (“Imaging Centreville”), and a network of other outpatient offices and services in Planning District (“PD”) 8. PWHS is a wholly owned subsidiary of UVA Community Health, Inc. (“UVACH”).**

**UVACH, in turn, is a wholly owned subsidiary of The Rector and Visitors of the University of Virginia on behalf of its Medical Center (“UVAMC”); University Hospital and a number of the Medical Center’s outpatient clinics are located in PD 10.**

**Collectively, the various facilities and services operated by UVAMC and UVACH are referred to herein as “UVA Health.”**

(a) In the case of proprietary corporation also attach: **Not applicable.**

- (1) A list of the names and addresses of the board of directors of the corporation.
- (2) A list of the officers of the corporation.
- (3) The name and address of the registered agent for the corporation.

(b) In the case of a non-profit corporation also attach: **Not applicable.**

- (1) A list of the names and addresses of the board of directors of the corporation
- (2) A list of the officers of the corporation
- (3) The name and address of the registered agent for the corporation

(c) In the case of a partnership also attach: **Not applicable.**

- (1) A list of the names and addresses of all partners.
- (2) The name and address of the general or managing partner.

(d) In the case of other types of ownership, also attach such documents as will clearly identify the owner.

**UVA Outpatient Imaging Centreville, LLC d/b/a UVA Health Outpatient Imaging Gainesville, is a limited liability company. It does not have a board of directors or officers. The name and address of the registered agent are as follows:**

**CT Corporation System  
4701 Cox Rd. Suite 285  
Richmond, VA 23219**

H. List all subsidiaries wholly or partially owned by the applicant.

**Not applicable.**

I. List all organizations of which the applicant is wholly or partially owned subsidiary.

**See Response to Section I.G above.**

J. If the operator is other than the owner, attach a list of the names(s) and addresses of the operator(s) of the medical care facility project. In the case of a corporate operator, specify the name and address of the Registered Agent. In the case of the partnership operator, specify the name and address of the general or managing partner.

**Not applicable.**

- K. If the operator is other than the owner, attach an executed copy of the contract or agreement between the owner and the operator of the medical care facility.

**Not applicable.**

## SECTION II

## ARCHITECTURE AND DESIGN

### A. Location of the Proposed Project

1. Size of site: 10.01 acres
2. Located in Prince William County / PD 8  
City/County/Planning District
3. Address or directions 7454 Limestone Drive, Gainesville, Virginia 20155
4. Has site been zoned for type of use proposed:

X Yes (attach copy of zoning or use permit)

See Attachment II.A.4 – Zoning Documentation.

       No

If no, explain status \_\_\_\_\_

\_\_\_\_\_

### B. Type of project for which Certificate of Public Need is requested. (Check one)

- (1)        New construction
- (2) X Remodeling/modernization of an existing facility
- (3)        No construction or remodeling/modernization
- (4) X Other establishment of specialized center for Magnetic Resonance Imaging (“MRI”) services in PD 8 through relocation of an approved MRI from Imaging Centreville

### C. Design of the facility

- (1) Does the facility have a long range plan? If yes, attach a copy.

**Imaging Gainesville does not itself have a long-range plan. However, the proposed facility will be a vital and integral part of UVACH and will support UVA Health’s mission, vision, values, and long-range plan.**

**UVA Health’s mission is transforming health and inspiring hope for all Virginians and beyond. Its vision is to be the nation’s leading public academic health system**

while transforming patient care, research, education, and engagement within the diverse communities it serves. At UVA Health facilities, “patients are first in everything we do.” UVA Health’s three strategic goals are (i) cultivating healthy communities and belonging for all, (ii) strengthening its foundation, and (iii) expanding its excellence and enabling discoveries for better health. Those goals are supported by key initiatives, which include improving easy access to care, providing superior patient outcomes and value-based care, and resource stewardship. These goals also envision expanding access to outpatient care across UVACH’s service area, supporting outpatient care locations with an infrastructure focused on population health and clinical performance, and continuously improving efficiency and effectiveness to enhance affordability for patients.<sup>1</sup>

As described further below, Imaging Gainesville will offer access to lower-cost, high-quality imaging services for UVACH’s patients in western PD 8 and is fully consistent with UVA Health’s strategic plan.

- (2) Briefly describe the proposed project with respect to location, style and major design features, and the relationship of the current proposal to the long range plan.

The proposed Imaging Gainesville outpatient diagnostic facility will be outfitted with an approved MRI unit relocated from Imaging Centreville. The Commissioner authorized this unit in 2021 based on high utilization of Imaging Centreville’s existing MRI unit and UVACH’s institutional need to better serve patients in the service area.<sup>2</sup> The proposed project will conveniently locate the approved MRI in Gainesville, in western Prince William County, a key part of Imaging Centreville’s and UVACH’s primary service areas (“PSAs”). The location is easily accessible to patients residing in Gainesville and the surrounding areas, where there are currently no existing freestanding outpatient imaging facilities. In fact, the proposed facility will be the first freestanding non-hospital-based outpatient imaging center in the western part of PD 8, where some 20% of the PD’s population resides. Attesting to the scarcity of convenient low-cost outpatient imaging options in western PD 8, in 2023, Imaging Centreville provided more than 4,000 MRI studies to patients from the proposed Imaging Gainesville PSA. Indeed, more than one-third of the patients now receiving MRI scans at Imaging Centreville would be more appropriately and conveniently served at the new Imaging Gainesville site. The proposed reallocation would optimize utilization of both MRI units while ensuring better access throughout the historical UVACH PSA.

Imaging Gainesville will be part of UVACH, supported by radiologists who are members of the faculty of the University of Virginia School of Medicine. The design of the imaging facility will enhance patient comfort and privacy while optimizing access and patient and staff flow. By relocating an approved MRI, UVACH will

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<sup>1</sup> See Attachment II.C.1 – UVA Health 2022-2032 Strategic Plan, also available at [uvahealth-strategicplan-2022-32.pdf](https://uvahealth-strategicplan-2022-32.pdf).

<sup>2</sup> COPN No. VA-04752, issued 8/16/2021.



significantly improve access for the Imaging Gainesville service area in a more convenient and accessible location, further enhancing the efficiency and stewardship of scarce health care resources. The proposed facility will also have ample space for additional complementary services such as wrap-around services focused on women's health, including a dedicated breast imaging center. Consistent with UVA Health's long-range plan (see Response to Section II.C.1 above), the project will facilitate access to high-quality, lower-cost imaging services and improve the efficiency, effectiveness, accessibility, continuity, and coordination of diagnostic services and medical care for UVACH's Northern Virginia patients.

- (3) Describe the relationship of the facility to public transportation and highway access.

**The proposed facility is conveniently and centrally located in Prince William County, with ready access to major highways, including Routes 29 and 619 as well as I-66. Public bus services are provided by Prince William County Transit.**

- (4) Relate the size, shape, contour and location of the site to such problems as future expansion, parking, zoning and the provision of water, sewer and solid waste services.

**The proposed MRI service will be in an outpatient imaging facility of ample and appropriate size, shape, contour, and location for the proposed use. The site is appropriately zoned; the building is supported by ample parking for patients and staff and by necessary utilities, including water, sewer, and solid waste services.**

- (5) If this proposal is to replace an existing facility, specify what use will be made of the existing facility after the new facility is completed.

**Not applicable.**

- (6) Describe any design features which will make the proposed project more efficient in terms of construction costs, operating costs, or energy conservation.

**The project will be located in existing space within an existing office building; no new construction or engineering will be necessary but rather only remodeling. The space will be designed in compliance with all applicable local, state, and federal requirements for energy efficiency and consumption and will reflect design features and systems that minimize cost and maximize energy efficiency and conservation while optimizing patient throughput and comfort.**

- D. Describe and document in detail how the facility will be provided with water, sewer and solid waste services. Also describe power source to be used for heating and cooling purposes. Documentation should include, but is not limited to:

- (1) Letters from appropriate governmental agencies verifying the availability and adequacy of utilities,
- (2) National Pollution Discharge Elimination System permits,
- (3) Septic tank permits, or
- (4) Receipts for water and sewer connection and sewer connection fees.

See **Attachment II.D – Utilities Documentation.**

E. Space tabulation – (show in tabular form)

1. If Item #1 was checked in II-B, specify:
  - a. The total number of square feet (both gross and net) in the proposed facility.
  - b. The total number of square feet (both gross and net) by department and each type of patient room (the sum of the square footage in this part should equal the sum of the square footage in (a) above and should be consistent with any preliminary drawings, if available).
2. If Item #2 was checked in II-B, specify:
  - a. The total number of square feet (both gross and net) by department and each type of patient room in the existing facility.
  - b. The total number of square feet (both gross and net) to be added to the facility.
  - c. The total number square feet (both gross and net) to be remodeled, modernized, or converted to another use.
  - d. The total number of square feet (both gross and net) by department and each type of patient room in the facility upon completion. (The sum of square footage in this part should equal the sum of the square footages in parts (a) and (b) above and should be consistent with any preliminary drawings, if available. (The department breakdown should be the same as in (a) above.)

See **Attachment II.E.2 – Space Tabulation.**

3. Specify design criteria used or rationale for determining the size of the total facility and each department within the facility.

**Imaging Gainesville will be designed and constructed to optimize patient access, privacy, and comfort. The freestanding center will have ample parking, reception, and waiting areas and will accommodate MRI services as well as a broad range of**

other imaging services such as CT,<sup>3</sup> x-ray, mammography, dexagram, and ultrasound. All space in the new center will meet manufacturer equipment requirements. The co-location of the proposed MRI service with other outpatient imaging modalities and complementary services (such as a dedicated breast imaging center) will improve patient access and facilitate the timely and efficient delivery of outpatient care.

F. Attach a plot plan of the site which includes at least the following:

1. The courses and distances of the property line.
2. Dimensions and location of any buildings, structures, roads, parking areas, walkways, easements, right-of-way or encroachments on the site.

See **Attachment II.F – Plot Plan.**

G. Attach a preliminary design drawing drawn to a scale of not less than 1/16”-1’0” showing the functional layout of the proposed project which indicates at least the following:

1. The layout of each typical functional unit.
2. The spatial relationship of separate functional components to each other.
3. Circulatory spaces (halls, stairwells, elevators, etc.) and mechanical spaces.

See **Attachment II. G – Preliminary Drawing.**

H. Construction Time Estimates

**The time estimates below assume a November 2024 decision on this Certificate of Public Need (“COPN”) application.**

- |    |                         |                                  |                                 |
|----|-------------------------|----------------------------------|---------------------------------|
| 1. | Date of Drawings:       | Preliminary <b><u>4/2025</u></b> | Final <b><u>6/2025</u></b>      |
| 2. | Date of Construction:   | Begin <b><u>7/2025</u></b>       | Completion <b><u>3/2026</u></b> |
| 3. | Target Date of Opening: | <b><u>4/2026</u></b>             |                                 |

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<sup>3</sup> See COPN Request No. VA-8769.

### SECTION III

### SERVICE DATA

- A. In brief narrative form describe the kind of services now provided and and/or the kind of services to be available after completion of the proposed construction or equipment installation.

As part of the integrated health system of UVA Health, UVACH operates two community hospitals in PD 8, PWMC and HAMC, as well as the Imaging Centreville outpatient diagnostic imaging center and an integrated network of primary and specialty care clinics throughout Northern Virginia. Each of the hospitals offers community hospital services, to include comprehensive inpatient and outpatient services, a wide range of specialty services such as cancer care, cardiology, primary care, orthopedics, a birthing center, women's services, and 24/7 emergency care. Along with Imaging Centreville, these facilities offer needed care primarily for residents of Prince William County but also the surrounding communities.

A key component of UVACH's mission is to serve the western portions of PD 8 and to bring community-based academic medicine to the diverse and growing population of the service area. This population, which comprises 20% of the PD's overall population, includes a significant number of indigent and underinsured patients. The Imaging Centreville facility is a critical access point to MRI studies for UVACH patients residing in western PD 8, which is generally underserved in terms of accessible, lower-cost imaging options. Utilization of Imaging Centreville's one operational MRI unit has been high and growing, reaching 6,523 scans, or 135% of the State Medical Facilities Plan ("SMFP") threshold, in 2023. In August 2021, UVACH obtained COPN approval to add a second MRI unit at the facility based on its institutional need for more capacity to serve its existing patients.

Table 1: 2020-2023 MRI Utilization for Imaging Centreville (1 MRI)

Year	MRI Procedures	% Utilization
VHI - Year end 12/31/2020	5,635	113%
VHI - Year end 12/31/2021	5,866	117%
VHI - Year end 12/31/2022	6,531	131%
Internal Data year end 12/31/2023	6,754	135%

In this application, UVACH proposes to reallocate the recently authorized second MRI unit to Imaging Gainesville instead, where it will serve UVACH's western PD 8 patient population in a much more accessible, convenient, and central location that can also accommodate additional complementary services. The proposed Imaging Gainesville facility will be the first freestanding imaging center in the western region of PD 8. This new facility will allow UVACH to continue to address the growing demand for high-quality, lower-cost outpatient imaging services in PD 8 delivered by radiologists on the faculty of the University of Virginia School of Medicine, using

imaging protocols implemented across UVA Health, to ensure consistent diagnostic testing and improve quality and outcomes. For many patients residing in the Imaging Gainesville PSA who currently travel to Imaging Centreville or seek MRI services at PWMC or HAMC, the facility will be a welcome option for low-cost UVACH outpatient services within their community. The proposed MRI services will be complemented by a variety of other diagnostic modalities.

B. Describe measures used or steps taken to assure continuity of care.

UVACH strives to provide the best patient care possible, as measured by various metrics of quality, safety, cost effectiveness, and the patient experience. To achieve these goals, its facilities and the care provided at these facilities must be operationally efficient and flexible to accommodate the ever-increasing demand for healthcare services in an ever-changing healthcare environment. Imaging Gainesville will be an integral part of UVA Health and its UVACH affiliates, allowing the provision of imaging services to UVACH's patients at the location that is the best fit for the patient, supporting the provision of the right care at the right time close to the patients' home, with the added benefit of the academic expertise and experience that UVA radiologists will provide.

Patients of Imaging Gainesville will also be the beneficiaries of the UVA Health One Team/United on Access initiative ("United on Access"). This initiative, which was launched in 2021 across UVA Health, is designed to connect patients to the appropriate care providers via standardized approaches and practices. Since January 2024, United on Access has added 1,000 new patient visits for UVACH, with 63% of these patients able to book appointments within 14 days. With the new United on Access systems in place and actively assisting both new and returning patients, Imaging Gainesville will be able to offer access to diagnostic services via protocols and processes uniformly used throughout UVA Health. This will support consistent scheduling, financial clearance, testing, referrals, and reporting of outcomes and will provide the best possible patient experience.

With respect to patient information maintained in electronic medical records, all Imaging Gainesville scans will be fully integrated with UVA Health patient health records. In particular, the proposed imaging services will utilize UVA Health's information system resources, such as the Picture Archive Communication System ("PACS"), tele-radiology, as well as transcription services, to ensure continuity of patient care through a common medical record number. Viewing images and reports is likewise accomplished via the UVA Health electronic medical record.

C. What procedures are utilized in quality care assessment?

Imaging Gainesville will adopt policies and procedures that are consistent with, and complementary to, the standards and guidelines used throughout UVA Health facilities. These policies and procedures cover all areas of medical operations and support the highest level of prevailing clinical medical standards in the areas of

**infection control, adverse contrast agent reaction management, patient care, safety management (education and environment), hazard surveillance and communication, fire safety, emergency preparedness, quality assurance procedures for equipment, radiation safety, systems contingency plans, and employee training and competence.**

**All clinical personnel (physicians, nurses, and technicians) providing services at Imaging Gainesville will be evaluated to ensure appropriate and current professional licensure and education. Prior to employment, a criminal background check will be performed. All clinical personnel are required to participate in new employment orientation which covers all relevant areas such as human resources, policies and procedures, including HIPAA confidentiality standards, and all clinical and emergency policies. All clinical personnel will be required to review equipment modality operational manuals and written clinical protocol standards and to have all necessary orientations to equipment. Equipment and pharmaceuticals will be maintained to allow for appropriate response to all medical emergencies, in accordance with the policies and procedures governing such emergencies.**

**Imaging Gainesville will deliver imaging services to its patients and the community with the skill, respect, and sensitivity that each deserves. UVACH encourages the provision of the highest quality of healthcare services and the promotion of the health and well-being of each of our patients. It provides patients access to necessary and appropriate healthcare services in compliance with all applicable laws, regulations, and standards, including state and federal legislation regarding patients' rights. As part of its efforts to continue high quality of care, UVACH tracks report turnaround time, infection control, medication management, patient satisfaction, and patient falls, and verifies the correct patient and procedure performed in compliance with The Joint Commission's National Patient Safety Guidelines. In addition, all MRI units operated by UVACH and its subsidiaries are accredited by the American College of Radiology.<sup>4</sup>**

**The delivery of MRI services at Imaging Gainesville will be under the direct on-site supervision of University of Virginia board-certified radiologists. Technologists are registered by the appropriate certifying organization and the Commonwealth of Virginia when required. Each staff member will have at least 40 hours of documented instruction in MRI imaging and instrumentation, interpretation, and clinical application of MRI images prior to the initiation of any services.**

- D. Describe the plan for obtaining additional medical, nursing and paramedical personnel required to staff the project following completion and identify the sources from which such personnel are expected to be obtained.**

**A total of 16 FTE staff are required to operate the facility. UVACH expects to recruit two new FTEs for operation of the MRI unit (and two new FTEs for operation of the CT unit proposed in COPN Request No. VA-8769); the remaining 12 FTEs needed for the imaging facility will initially be redeployed from nearby PVMC/HAMC. UVACH does not expect such redeployment to have any impact on**

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<sup>4</sup> See Attachment III.K.2 – Accreditation Information.

hospital operations at PWMC or HAMC because staffing decisions will be made collaboratively by operations managers across PWHS per a joint assessment of the needs of each facility. As utilization at Imaging Gainesville increases, UVACH expects that recruitment of new employees specifically for this new facility may be needed. Several UVA education programs provide training in positions needed for the facility, and UVACH works closely with those programs on placement opportunities. Thus, UVACH does not anticipate any significant challenges in staffing the proposed facility.

E. Facilities and Services to be Provided (Check)

See Attachment III.E – Facilities and Services to be Provided.

F. Program

1. Is (will) this outpatient facility (be) a department, unit or satellite of a hospital?

**Imaging Gainesville, while owned by PWHS/UVACH, will be operated as an Independent Diagnostic Testing Facility (“IDTF”), not as a hospital outpatient department.**

\_\_\_\_\_ Yes (Give name of hospital) \_\_\_\_\_

  X   No

2. Is this outpatient facility affiliated with or does it have a transfer agreement with a hospital?

  X   Yes (Give name of hospital) \_\_\_\_\_

**PWMC and HAMC.**

\_\_\_\_\_ No

3. Is (will) there (be) an arrangement whereby medical records can readily be transferred between this outpatient facility and an inpatient facility (ies)?

  X   Yes (give name of facility)

**With a patient’s consent to release, Imaging Gainesville will have the ability to send a patient’s imaging studies electronically to any local hospital, tertiary care center, and/or physician practice.**

\_\_\_\_\_ No

4. Outpatient services are (will be) available from 8 a.m. to 4:30 p.m. 5 days of week.
5. Does (will) the facility operate scheduled clinics?  
       Yes (Attach clinic schedule list)  
  X   No
6. Are there other organized outpatient services in your primary service area?  
  X   Yes        No

**In addition to MRI services offered at Imaging Centreville, MRI services are provided in the proposed Imaging Gainesville PSA at PWMC, HAMC, Centreville/Clifton Imaging Center (Centreville), Inova Reston MRI, and Inova Fair Oaks Hospital (Fairfax).**

7. The outpatient facility is (will be) staffed:
  - (a) Only by physicians on call:        Yes   X   No
  - (b) By full time physicians:   X   Yes        No
  - (c) By physicians who limit their practice to this outpatient service?        Yes   X   No
8. State specifically any limitations or restrictions for participation in the services of the facility.

**The proposed services will be available to all clinically appropriate patients upon appropriate referral without regard to the patients' ability to pay or payment source, consistent with UVACH's charity care policies.**

G. Please provide historical and/or project utilization statistics for the facility including number of patients, number of patient visits and number of patient services.

**MRI utilization at Imaging Centreville has historically been high and growing, leading the Commissioner to approve a second MRI unit for the facility in 2021.<sup>5</sup> The tables below show MRI utilization data reported by VHI for the period 2020-2022 and internal reporting for FY23, for Imaging Centreville, PWMC, and HAMC.**

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<sup>5</sup> COPN No. VA-04752, issued 8/16/2021.



**Table 1: 2020-2023 MRI Utilization for Imaging Centreville (1 MRI)<sup>6</sup>**

<b>Year</b>	<b>MRI Procedures</b>	<b>% Utilization</b>
VHI - Year end 12/31/2020	5,635	113%
VHI - Year end 12/31/2021	5,866	117%
VHI - Year end 12/31/2022	6,531	131%
Internal Data year end 12/31/2023	6,754	135%

**Table 2: 2020-2023 Utilization for UVACH PD 8 MRI Units.<sup>7</sup>**

<b>MRI Utilization</b>	<b>MRI Units</b>	<b>2020<sup>8</sup></b>	<b>2021<sup>9</sup></b>	<b>2022<sup>10</sup></b>	<b>2023<sup>11</sup></b>	<b>2023 Utilization Percentage</b>
PWMC	2	4,614	6,112 <sup>12</sup>	3,125	5,325	53%
HAMC	1	4,110	4,683	2,276	4,709	94%
Imaging Centreville	1 <sup>13</sup>	5,635	5,866	6,531	6,754	135%
Total	4	14,359	16,661	11,932 <sup>14</sup>	16,788	84%

The projected MRI utilization of Imaging Gainesville has been conservatively modeled on a shift of approximately one-third of Imaging Centreville’s patients. Some patients are also expected to transition from PWMC and HAMC, reflecting patients’ preference for a more affordable and outpatient-focused imaging option. Overall, in projecting MRI utilization at Imaging Gainesville, UVACH considered multiple factors, including, but not limited to, the following:

<sup>6</sup> A second MRI unit was approved per COPN No. VA-04752 issued 8/16/2021.

<sup>7</sup> While MRI volumes at PWMC and HAMC are lower, the Division of Certificate of Public Need (“DCOPN”) and the Commissioner appropriately recognized that Imaging Centreville had a unique institutional need for the second MRI unit and that there were no more favorable alternatives to the proposed project (given that HAMC only has one MRI unit and that relocation of one of PWMC’s units would quickly result in a need for additional capacity at that facility). DCOPN Staff Report re COPN Request No. VA-8567 at 22.

<sup>8</sup> Calendar year end 12/31/2020.

<sup>9</sup> Calendar year end 12/31/2021.

<sup>10</sup> In 2022, PWMC and HAMC shifted from calendar year reporting (1/1-12/31) to fiscal year reporting (7/1-6/30) to align with UVAMC’s reporting framework. As a result, 2022 VHI-reported utilization for PWMC and HAMC reflects only six (6) months’ worth of MRI utilization. Imaging Centreville did not make a similar change and still reports on a calendar year basis; accordingly, its 2022 reported volumes reflect a full year.

<sup>11</sup> Reflects calendar year end 12/31/2023 for Imaging Centreville and fiscal year end 6/30/2023 for PWMC and HAMC.

<sup>12</sup> PWMC volumes for 2021 were not reported in VHI.

<sup>13</sup> A second MRI unit was approved per COPN No. VA-04752 issued 8/16/2021.

<sup>14</sup> 2022 utilization appears lower because, as discussed in note 10, only six (6) months’ worth of utilization was reported for PWMC and HAMC.

- Historical MRI volumes and growth trends at Imaging Centreville as well as utilization in the broader service area;
- The historical role of Imaging Centreville in meeting demand for MRI imaging in the service area;
- Historical and projected population growth in the service area;
- Anticipated demand for MRI services in the service area; and
- Reimbursement trends driving demand for outpatient diagnostic services from hospital-based to freestanding, lower-cost facilities.

Integrating these assumptions and considerations, Table 3 below reflects projected utilization of the relocated MRI unit at Imaging Gainesville over its first two years of operation.

**Table 3: Imaging Gainesville Projected MRI Utilization**

<b>Year</b>	<b>Projected MRI Procedures</b>
Year 1 (FY26)	2,471
Year 2 (FY27)	2,671

H. Staffing of Existing and/or Proposed Facility

In the following categories, indicate the number of full time equivalent personnel (at least 35 hours per week).

See **Attachment III.H – Staffing.**

- I. Present a plan for obtaining all additional personnel required to staff the project following completion and identify the sources from which such personnel are expected to be obtained.

**Please see response to Section III.D.**

- J. Describe the anticipated impact that the project will have on the staffing of other facilities in the service area.

**Requiring only two (2) new FTEs for the operation of the proposed MRI unit and a total of 16 FTEs for the entire facility (with two additional new FTEs to be hired for operation of the CT<sup>15</sup> and the remaining 12 FTEs to be leveraged from PWMC and HAMC as needed), Imaging Gainesville’s staffing needs are minimal and are not expected to impact staffing at other facilities in PD 8.**

- K. Attach the following information or documents:

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<sup>15</sup> Proposed per COPN Request No. VA-8769.

1. Copy of most recent licensing report from State Agency (existing facilities, excluding public health centers).

**Not applicable.**

2. Current accreditation status and copy of latest accreditation report from Joint Commission on Accreditation of Hospitals (existing facilities excluding public health centers).

**Not applicable to Imaging Gainesville as The Joint Commission does not accredit IDTFs. Documentation of PWMC's and HAMC's most recent accreditation information is provided at Attachment III.K.2 – Accreditation Information.**

3. Roster of medical staff (existing facilities). Indicate their specialty, Board Certification, Board eligibility and staff privileges (active, associate, etc.).

**See Attachment III.K.3 – Medical Staff Roster.**

4. Copies of letters of commitment or statement of intent from physicians indicating they will staff the proposed new facility or service upon completion (existing and proposed facilities).

**See Attachment III.K.4 – Letter of Commitment.**

## **SECTION IV                      PROJECT JUSTIFICATION AND IDENTIFICATION OF COMMUNITY NEED**

A.        Please provide a comprehensive narrative description of the proposed project.

UVACH is keenly aware of the needs of the population in western PD 8. In 2021, UVACH became the sole owner and operator of the various facilities formerly joint-ventured with Novant Health and UVA Health. This resulted in a strategic reassessment of how UVACH and its community health components could most effectively bring academic medicine to PD 8 and advance its clinical, teaching, and research missions in this region and better serve the indigent and Medicaid populations in PD 8. This reassessment has highlighted the lack of freestanding imaging options for UVACH patients residing in western PD 8 and that area's particular need for lower-cost outpatient imaging options.

At the same time, Imaging Centreville's MRI services have historically been highly utilized. In 2021, the Commissioner approved the addition of a second MRI unit at the facility based on its compelling **institutional need** for additional capacity to serve existing patients within the service area.<sup>16</sup> Upon reassessment of UVACH patients' needs, particularly in western PD 8, UVACH has determined that implementing the second MRI unit approved for Imaging Centreville at a new freestanding facility in western PD 8, squarely in the Imaging Centreville PSA but much closer for many patients in western Prince William County, would improve access for its patients to lower-cost imaging services in the UVACH PSA.

Specifically, this application proposes to establish an outpatient imaging center, with a relocated MRI unit, in PD 8 at 7454 Limestone Drive, Gainesville, Virginia. This new facility will be situated between PWMC and HAMC. And while owned by UVACH, it will not be operated as a hospital department. Instead, it will be operated as an IDTF. This new facility, to be known as UVA Health Outpatient Imaging Gainesville, will be the first IDTF in the western portion of PD 8, where approximately 20% of the PD's population resides. It will provide a lower-cost, closer-to-home option for patients residing in that area who today undergo MRI studies at Imaging Centreville or who obtain MRI services at PWMC or HAMC but would more appropriately be imaged in the lower-cost outpatient setting closer to home. The proposed relocation of the MRI unit recently approved for Imaging Centreville to a new freestanding facility in western PD 8, in a critical but underserved part of Imaging Centreville's and UVACH's PSAs, would significantly enhance access to much-needed care.

### **1. There is a geographic need for UVACH's proposal.**

Western PD 8, a populous and growing part of PD 8, currently lacks freestanding imaging options and has a particular need for low-cost outpatient imaging services.

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<sup>16</sup> COPN No. VA-04752 issued 8/16/2021.

The closest MRI services to Gainesville are located at two UVACH inpatient hospitals: PPMC and HAMC. There are no outpatient imaging services located within ten miles of Gainesville, with the closest freestanding imaging facility being Imaging Centreville 10 miles away. The next-closest freestanding MRI services are 17 miles away. Table 4 below shows the location of the nearest MRI imaging facilities to the proposed Gainesville facility in PD 8.

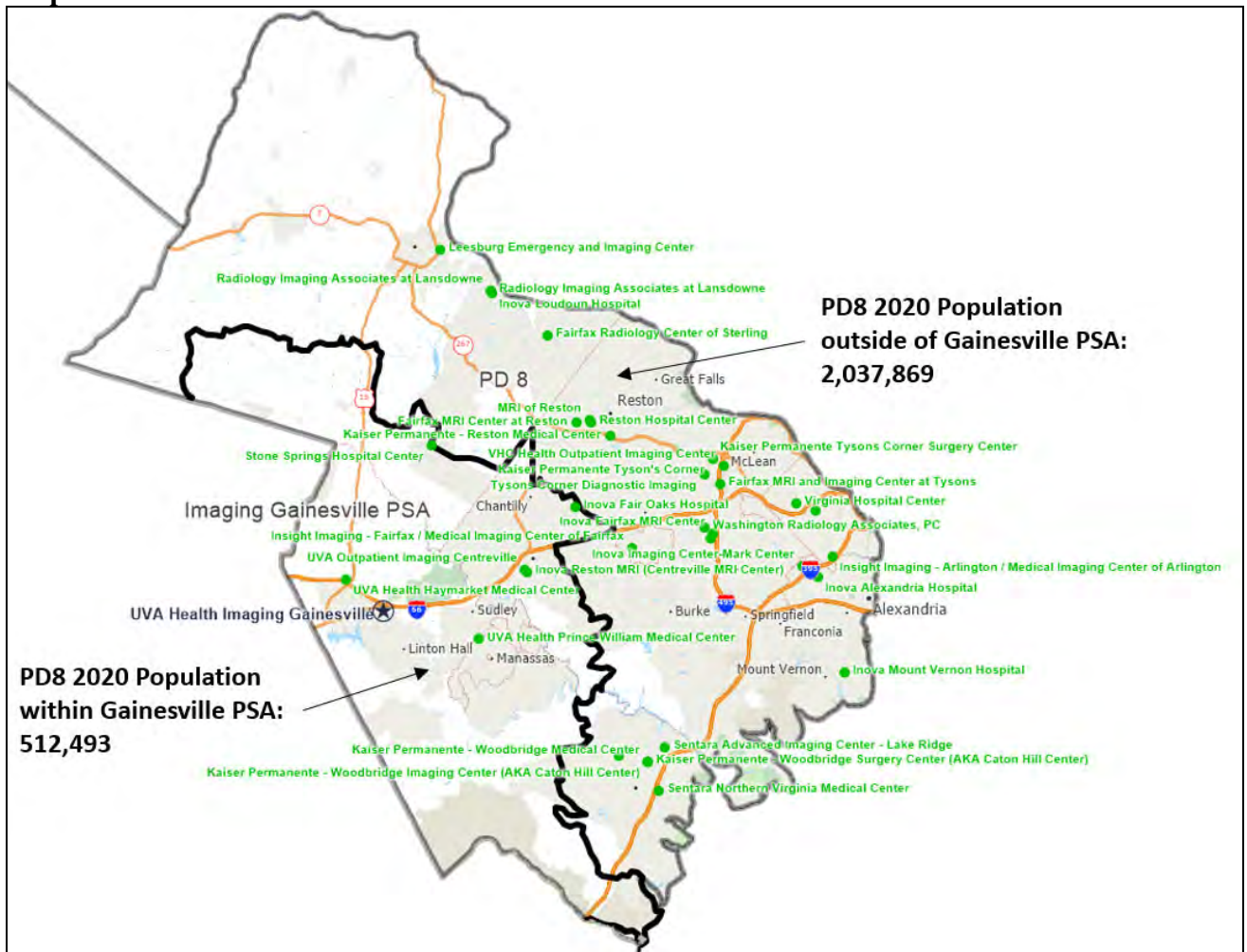
**Table 4: Distance from Imaging Gainesville to the Nearest MRI Services in PD 8**

<b>Facility</b>	<b>Driving Distance</b>
HAMC	4.4 miles
PPMC	7.7 miles
Imaging Centreville	10.4 miles
Inova Reston MRI Center	10.7 miles
Stone Springs Hospital	13.1 miles
Fauquier Hospital	14.2 miles
Inova Fair Oaks Hospital	16.0 miles
Insight Imaging - Fairfax/Medical Imaging Center of Fairfax	17.1 miles
Inova Fairfax MRI Center	24.9 miles

The dearth of outpatient imaging facilities in western PD 8 is illustrated by the map of existing MRI services in PD 8 below.

*[Space intentionally left blank.]*

## Map of MRI Facilities in PD 8

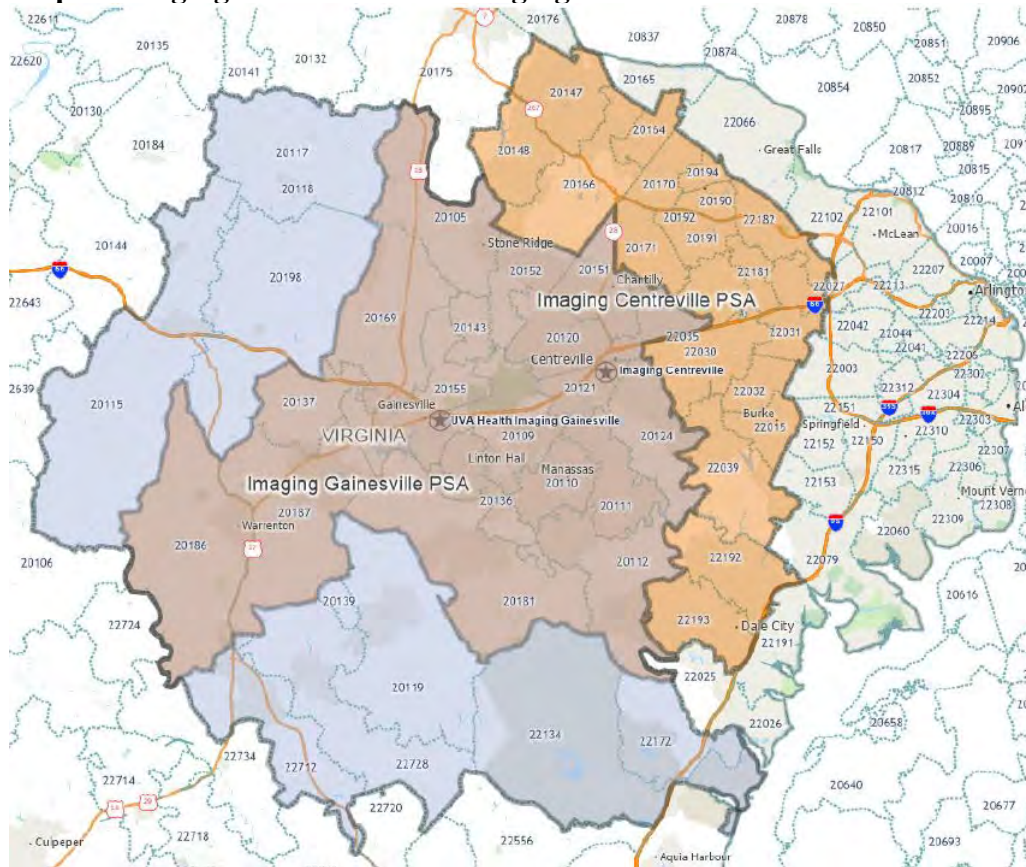


Many of these underserved western PD 8 patients live squarely in the Imaging Gainesville PSA and currently receive MRI services at Imaging Centreville or one of the UVACH hospitals, PPMC or HAMC. Indeed, the Imaging Centreville PSA and the proposed Imaging Gainesville PSA overlap substantially, as illustrated in the map below.

*[Space intentionally left blank.]*



## Map of Imaging Centreville and Imaging Gainesville PSAs



In 2023, approximately 62% of Imaging Centreville’s MRI scans (about 4,071 studies) originated in the Imaging Gainesville PSA, as did many more MRI studies performed at PWMC or HAMC – about 4,713 and 4,158, respectively. In short, Imaging Centreville serves large numbers of patients from the Gainesville community and has an institutional need to improve access for these patients. Placement of the second MRI at Imaging Gainesville (rather than at Imaging Centreville) will better address Imaging Centreville’s and UVACH’s institutional need for adequate and conveniently sited MRI capacity for this population. With MRI services available at Imaging Gainesville, UVACH patients residing in the westernmost area of PD 8 could access those services more appropriately and easily closer to home. This would optimize utilization of both units currently approved for Imaging Centreville while ensuring better access throughout the UVACH PSA.

### **2. There is a need for better financial access to MRI services in the proposed PSA.**

As discussed above, the closest imaging services to the Gainesville-area population are located at PWMC and HAMC, UVACH’s two acute care community hospitals in PD 8. Neither hospital represents the optimal or preferable setting for patients seeking low-cost outpatient services close to home. Indeed, many patients from the Imaging Gainesville PSA currently travel to Imaging Centreville, about 10 miles

away, for lower-cost MRI services. Imaging Centreville is an IDTF and offers imaging services at significantly lower charges than the hospitals. In fact, Medicare and other third-party payor reimbursement policies increasingly restrict payment for outpatient imaging performed in the inpatient setting. For many patients, hospitals are also more difficult to physically navigate. UVACH's Imaging Gainesville proposal will expand the financial access benefits of Imaging Centreville and make them more accessible to existing UVACH patients who reside in the westernmost area of PD 8 but currently travel at least 10 miles to Imaging Centreville or receive MRI studies in the more costly hospital setting at PWMC or HAMC.

Because Imaging Gainesville will be committed to treating patients regardless of their ability to pay, the increased access to care also enhances opportunities for patients with financial needs so that they too can obtain the healthcare services they require. UVACH anticipates that, with a lower-cost option made available to patients closer to home, those patients will remain in their home community.

There are no reasonable alternatives to Imaging Gainesville that would meet the needs of the population in a less costly, more efficient, or more effective manner. Imaging Gainesville will be the first freestanding imaging center in the western part of PD 8 and a much-needed local lower-cost alternative to hospital-based imaging in that area.

### **3. There is a clinical need for UVACH's project.**

Imaging Gainesville will bring academically focused yet low-cost imaging services and expertise closer to the western Prince William community, co-located with a range of specialty and subspecialty radiologists. The facility would be a full-service freestanding imaging center offering not only MRI services but also comprehensive diagnostic services such as CT,<sup>17</sup> x-ray, ultrasound, and fluoroscopy. With this new facility, UVACH will address the growing demand for high-quality, lower-cost imaging services in PD 8. Professional services will be delivered by radiologists on the faculty of the University of Virginia School of Medicine and using imaging protocols implemented across UVA Health, ensuring consistent diagnostic testing and high-quality outcomes.

The Imaging Gainesville facility will also provide ample space to allow the co-location of several additional wrap-around services focused on women's health, including a dedicated breast imaging center – space otherwise not available at the Imaging Centreville facility. These services will create a centralized location for women to receive care in an easily accessible outpatient setting. UVACH has long recognized the demand for expanded women's imaging services in western PD 8, and the project will unquestionably enhance access to such services by offering accessible and affordable MRI studies.

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<sup>17</sup> Proposed per COPN Request No. VA-8769.



UVACH also anticipates the expansion of primary care, urology, and orthopedic services as additional specialty and subspecialty providers are added at various UVACH facilities in PD 8. Indeed, UVACH has recently added six primary care providers. These new hires have increased the staffing of these crucially needed services from 30 in 2023 to 36 in 2024, and UVACH plans to nearly double the number of primary care providers in 2025. With further growth also expected in other UVACH service lines, imaging needs are similarly expected to increase.

#### **4. Conclusion.**

Collectively, these factors – high utilization by Gainesville-area residents at Imaging Centreville, PPMC, and HAMC; lack of low-cost outpatient imaging options in western PD 8; significant volumes of indigent/underinsured patients in the PSA; comparative charge data; and clinical considerations – underscore the need for Imaging Gainesville and the value that it will bring to the community. Alongside a variety of other diagnostic modalities, the proposed MRI unit will substantially enhance access to lower-cost outpatient-focused imaging services in the currently underserved western part of PD 8.

#### **B. Identification of Community Need**

1. Describe the geographic boundaries of the facility’s primary service area. (Note: Primary service area may be considered to be geographic area from which 75% of patients are expected to originate.)

See **Attachment IV.B.1 – Imaging Gainesville PSA Map.**

2. Provide patient origin, discharge diagnosis or utilization data appropriate for the type of project proposed.

See **Attachment IV.B.2 – Imaging Gainesville Projected Patient Origin.**

- C.
  1. Is (are) the service(s) to be offered presently being offered by any other existing facility(ies) in the Health Planning Region?

**Yes.**

2. If Yes,
  - a. Identify the facility(ies)

**A list of MRI facilities in PD 8 (hospital/hospital-based and freestanding) is included as Attachment IV.C.2 – MRI Facilities in PD 8. While several applications for MRI**

**services are currently pending review, none seeks to establish MRI services in the proposed Imaging Gainesville PSA.<sup>18</sup>**

- b. Discuss the extent to which the facility(ies) satisfy(ies) the current demand for the service(s).

**Existing MRI facilities in PD 8 do not address the need for the proposed UVACH project. That project seeks to improve access to convenient outpatient MRI services for existing Imaging Centreville and UVACH patients and residents of the existing Imaging Centreville and UVACH PSAs – primarily patients who have historically utilized Imaging Centreville or PWMC/HAMC for their MRI imaging needs. The proposed project will facilitate access to lower-cost services for patients as well as payers. None of the existing facilities meets, or can meet, UVACH’s need to relocate the second MRI unit approved for Imaging Centreville to better serve its patients. Indeed, there are currently no freestanding outpatient imaging services in the western part of PD 8, where approximately 20% of the PD’s population, including many UVACH patients, reside.**

- c. Discuss the extent to which the facility(ies) will satisfy the demand for services in five years.

**None of the existing MRI providers in PD 8 can meet the need for UVACH’s proposal today, and none can do so in five years. UVACH has an institutional need to relocate one authorized MRI from Imaging Centreville to Imaging Gainesville to address the pressing needs of the Gainesville-area community. The relocation is critical to meet growing demand for UVACH’s outpatient MRI services and for a low-cost alternative in the currently underserved western PD 8. Given the substantial population residing in the proposed PSA – approximately 20% of PD 8’s total population, or roughly 512,000 people – the lack of low-cost outpatient imaging services in this part of the PD, and the continuing growth anticipated in the service area, none of the existing facilities will be able to meet the need for UVACH’s project in five years. Imaging Gainesville will be ideally positioned to address this need. It will provide a low-cost, convenient option supported by the University of Virginia School of Medicine radiologists and dedicated to outpatient imaging services in a currently underserved part of PD 8.**

- D. Discuss how project will fill an unmet need in the delivery of health care in the service area including, where applicable, geographic barriers to access.

**UVACH has an institutional need to better serve its existing outpatients in western PD 8, exacerbated by a public need for better access to lower-cost freestanding outpatient imaging services in the currently underserved western PD 8. At present, residents who need outpatient MRI imaging must go to either Imaging Centreville**

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<sup>18</sup> COPN Request No. VA-8755, Inova Reston MRI Center, Expand MRI service in Fairfax County, Virginia, and COPN Request No. VA-8756, IFRC, Establish MRI Service in Woodbridge, Virginia.

**10 miles away or to PWMC or HAMC and utilize busy hospital resources associated with higher charges and greater accessibility challenges. Imaging Gainesville will improve the delivery of more affordable MRI services in western PD 8, which currently lacks freestanding imaging services, facilitating geographic, logistical, financial, and clinical access to timely MRI services for increasingly cost-conscious patients and payors.**

**See also Response to Section IV.A above.**

- E. Discuss the consistency of the proposed project with applicable Regional Health Plan, State Health Plan, State Medical Facilities Plan, or other plans promulgated by State agencies.

**See Attachment IV.E – Statement of Consistency with the SMFP.**

- F. Show the method and assumptions used in determining the need for additional beds, new services or deletion of service in the proposed project's service area.

**See Response to Section III.G.**

- G. Coordination and Affiliation with Other Facilities.

Describe any existing or proposed formal agreements or affiliations to share personnel, facilities, services or equipment. (Attach copies of any formal agreements with another health or medical care facility.)

**Imaging Gainesville will be part of UVA Health's integrated health care delivery system. In the event that an Imaging Gainesville patient requires clinical care, Imaging Gainesville will arrange for transport to the nearest and most clinically appropriate facility.**

- H. Attach copies of the following documents:

1. A map of the service area indicating:
  - a. Location of proposed project.
  - b. Location of other existing medical facilities (by name, type (hospital, nursing home, outpatient clinic, etc.) and number of beds in each inpatient facility).

**See Attachment IV.H.1 – Map of Existing Providers and Proposed Project.**

2. Any material which indicates community and professional support for this

project; i.e. letter of endorsement from physicians, community organizations, local government, Chamber of Commerce, medical society, etc.

See **Attachment IV.H.2 – Letters of Support.**

3. Letters to other area facilities advising of the scope of the proposed project.

See **Attachment IV.H.3 – Notification Letters.**

## SECTION V

## FINANCIAL DATA

It will be the responsibility of the applicant to show sufficient evidence of adequate financial resources to complete construction of the proposed project and provide sufficient working capital and operating income for a period of not less than one (1) year after the date of opening:

- A. Specify the per diem rate for all existing negotiated reimbursement contracts and proposed contracts for patient care with state and federal governmental agencies, Blue Cross/Blue Shield Plans, labor organizations such as health and welfare funds and membership associations.

**Not applicable.**

- B. Does the facility participate in a regional program which provides a means for facilities to compare its costs and operations with similar institutions?

  X   Yes        No

If yes, specify program Virginia Health Information

Provide a copy of report(s) which provide(s) the basis for comparison.

See Attachment V.B - 2022 EPICS Reports for PWMC, HAMC, and Imaging Centreville.

- C. Estimated Capital Costs

Please see “Instructions for Completing Estimated Capital Costs” Section of the Certificate of Need application for detailed instructions for completing this question (attached)

**Only the MRI component of the planned facility is subject to COPN review and approval. The MRI service will require approximately 15% of the entire Imaging Gainesville space (to include designated MRI space and all imaging-related support and common spaces.) The total project costs have been allocated to the MRI project accordingly.**

### Part I – Direct Construction Costs

- |    |   |                                |
|----|---|--------------------------------|
| 1. | Cost of materials                           | <u>\$468,025<sup>19</sup></u>  |
| 2. | Cost of labor                               | \$ <u>                    </u> |
| 3. | Equipment included in construction contract | \$ <u>                    </u> |

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<sup>19</sup> Reflects 15% of design & fit-out costs + medical equipment design & fit costs + contingency.

- |    |                                |                          |
|----|--------------------------------|--------------------------|
| 4. | Builder's overhead             | \$ _____                 |
| 5. | Builder's profit               | \$ _____                 |
| 6. | Allocation for contingencies   | \$ _____                 |
| 7. | Sub-total (add lines 1 thru 6) | \$ <b><u>468,025</u></b> |

Part II – Equipment Not Included in Construction Contract  
If leasehold, lease expense over entire term of lease  
(List each separately)

- |    |   |                            |
|----|---|----------------------------|
| 8. | a. <b><u>MRI</u></b>                    | \$ <b><u>1,600,000</u></b> |
|    | b. <b><u>Information Technology</u></b> | \$ <b><u>40,347</u></b>    |
|    | c. <b><u>Furniture and Fixtures</u></b> | \$ <b><u>44,382</u></b>    |
|    | d. _____                                | \$ _____                   |
|    | e. _____                                | \$ _____                   |
| 9. | Sub-total (add lines 8a thru 8e)        | \$ <b><u>1,684,729</u></b> |

Part III – Site Acquisition Costs

- |     |   |                          |
|-----|---|--------------------------|
| 10. | Full purchase price                                   | \$ _____                 |
| 11. | For sites with standing structures                    | \$ _____                 |
|     | a. purchase price allocable to structures             | \$ _____                 |
|     | b. purchase price allocable to land                   | \$ _____                 |
| 12. | Closing costs   | \$ _____                 |
| 13. | If leasehold, lease expense over entire term of lease | \$ <b><u>539,349</u></b> |
| 14. | Additional expenses paid or accrued:                  |                          |
|     | a. _____  | \$ _____                 |
|     | b. _____  | \$ _____                 |
|     | c. _____  | \$ _____                 |

15. Sub-total (add lines 10 thru 14c) \$ **539,349**

Part IV – Site Preparation Costs

16. Earth work \$ \_\_\_\_\_

17. Site utilities \$ \_\_\_\_\_

18. Roads and walks \$ \_\_\_\_\_

19. Lawns and planting \$ \_\_\_\_\_

20. Unusual site conditions:

a. \_\_\_\_\_  
\$ \_\_\_\_\_ b. \_\_\_\_\_  
\$ \_\_\_\_\_

21. Accessory structures \$ \_\_\_\_\_

22. Demolition costs \$ \_\_\_\_\_

23. Sub-total (add lines 16 thru 22) \$ \_\_\_\_\_

Part V – Off-site Costs (List each separately)

24. \_\_\_\_\_ \$ \_\_\_\_\_

25. \_\_\_\_\_ \$ \_\_\_\_\_

26. \_\_\_\_\_ \$ \_\_\_\_\_

27. \_\_\_\_\_ \$ \_\_\_\_\_

28. Sub-total (add lines 24 thru 27) \$ \_\_\_\_\_

Part VI – Architectural and Engineering Fees

29. Architect's design fee \$ **13,449**

30. Architect's supervision fee \$ \_\_\_\_\_

31. Engineering fees \$ \_\_\_\_\_

32. Consultant's fees \$ \_\_\_\_\_

33. Sub-total (add lines 29 thru 32) \$ **13,449**

Part VII – Other Consultant Fees (List each separately)

34. a. \_\_\_\_\_ \$ \_\_\_\_\_

b. \_\_\_\_\_ \$ \_\_\_\_\_

c. \_\_\_\_\_ \$ \_\_\_\_\_

35. Sub-total (add lines 34a thru 34c) \$ \_\_\_\_\_

Part VIII – Taxes During Construction

36. Property taxes during construction \$ **3,550**

37. List other taxes:

a. \_\_\_\_\_ \$ \_\_\_\_\_

b. \_\_\_\_\_ \$ \_\_\_\_\_

38. Sub-total (add lines 36 thru 37b) \$ **3,550**

Part IX-A – HUD Section 232 Financing

39. Estimated construction time( in months) \_\_\_\_\_

40. Dollar amount of construction loan \$ \_\_\_\_\_

41. Construction loan interest rate \_\_\_\_\_ %

42. Estimated construction loan interest costs \$ \_\_\_\_\_

43. Term of financing (in years) \_\_\_\_\_

44. Interest rate on permanent loan \_\_\_\_\_ %

45. FHA mortgage insurance premium \$ \_\_\_\_\_

46. FHA mortgage fees \$ \_\_\_\_\_

47. Financing fees \$ \_\_\_\_\_

48. Placement fees \$ \_\_\_\_\_



49. AMPO (non-profit only) \$ \_\_\_\_\_
50. Title and recording fees \$ \_\_\_\_\_
51. Legal fees \$ \_\_\_\_\_
52. Total interest expense on permanent mortgage loan \$ \_\_\_\_\_
53. Sub-total Part IX-A HUD Section 232 Financing (add lines 42, 45, 46, 47, 48, 49, 50 and 51) \$ \_\_\_\_\_

Part IX-B – Industrial Development Authority Revenue and General Obligation Bond Financing

(Circle selected method of financing)

54. Method of construction financing (construction loan, proceeds of bond sales, if other, specify) \_\_\_\_\_  
If construction is to be financed from any source other than bond sale proceeds, answer question 56 through 58. Otherwise, proceed to question 59.
55. Estimated construction time (in months) \_\_\_\_\_
56. Dollar amount of construction loan \$ \_\_\_\_\_
57. Construction loan interest rate \_\_\_\_\_ %
58. Estimated construction loan interest cost \$ \_\_\_\_\_
59. Nature of bond placement (direct, underwriter, if other, specify) \_\_\_\_\_
60. Will bonds be issued prior to the beginning of construction? \_\_\_\_\_ Yes \_\_\_\_\_ No
61. If the answer to question 60 is yes, how long before (in months)? \_\_\_\_\_
62. Dollar amount of bonds expected to be sold prior to the beginning of construction \$ \_\_\_\_\_
63. Will principal and interest be paid during construction or only interest? \_\_\_\_\_

64. Bond interest expense prior to the beginning of construction(in dollars) \$ \_\_\_\_\_
65. How many months after construction begins will last bond be sold? \_\_\_\_\_
66. Bond interest expense during construction \$ \_\_\_\_\_
67. What percent of total construction will be financed from bond issue? \$ \_\_\_\_\_
68. Expected bond interest rate \_\_\_\_\_ %
69. Anticipated term of bond issued (in years) \_\_\_\_\_
70. Anticipated bond discount (in dollars) \_\_\_\_\_
71. Legal costs \$ \_\_\_\_\_
72. Printing costs \$ \_\_\_\_\_
73. Placement fee \$ \_\_\_\_\_
74. Feasibility study \$ \_\_\_\_\_
75. Insurance \$ \_\_\_\_\_
76. Title and recording fees \$ \_\_\_\_\_
77. Other fees (list each separately)
- a. \_\_\_\_\_ \$ \_\_\_\_\_
- b. \_\_\_\_\_ \$ \_\_\_\_\_
- c. \_\_\_\_\_ \$ \_\_\_\_\_
78. Sinking fund reserve account (Debt Service Reserve) \$ \_\_\_\_\_
79. Total bond interest expenses (in dollars) \$ \_\_\_\_\_
80. Sub-total Part IX\_B (add lines 58, 64, 66, 71, 72, 73, 74, 75, 76, 77a, b, c and 78) \$ \_\_\_\_\_

Part IX\_C – Conventional Mortgage Loan Financing

81.	Estimated construction time (in months)	_____
82.	Dollar amount of construction loan	\$ _____
83.	Construction loan interest rate	_____ %
84.	Estimated construction loan interest cost (in dollars)	\$ _____
85.	Term of long term financing (in years)	_____
86.	Interest rate on long term loan	_____ %
87.	Anticipated mortgage discount (in dollars)	\$ _____
88.	Feasibility study	\$ _____
89.	Finder's fee	\$ _____
90.	Legal fees	\$ _____
91.	Insurance	\$ _____
92.	Other fees (list each separately)	
	_____	\$ _____
93.	_____	\$ _____
94.	Total permanent mortgage loan interest expense (in dollars)	\$ _____
95.	Sub-total Part IX_C (add lines 84 & 88 thru 93)	\$ _____

Financial Data Summary Sheet

96.	Sub-total Part I	Direct Construction Cost (line 7)	\$ <b><u>468,025</u></b>
97.	Sub-total Part II	Equipment not included in construction contract (line 9)	\$ <b><u>1,684,729</u></b>
98.	Sub-total Part III	Site Acquisition Costs (line 15)	\$ <b><u>539,349</u></b>
99.	Sub-total Part IV	Site Preparation Cost (line 23)	\$ _____

100.	Sub-total Part V	Off-Site Costs (line 28)	\$ _____
101.	Sub-total Part VI	Architectural and Engineering fees (line 33)	\$ <u><b>13,449</b></u>
102.	Sub-total Part VII	Other Consultant fees (line 35)	\$ _____
103.	Sub-total Part VIII	Taxes During Construction (line 38)	\$ <u><b>3,550</b></u>
104.	Sub-total Part IX-A	HUD-232 Financing (line 53)	\$ _____
105.	Sub-total Part IX-B	Industrial Development Authority Revenue & General Revenue Bond Financing (line 80)	\$ _____
106.	Sub-total Part IX-C	Conventional Loan Financing (line 95)	\$ _____
107.	<b>TOTAL CAPITAL COST</b> (lines 96 thru 106)		\$ <u><b>2,709,102</b></u>
108.	Percent of total capital costs to be financed <u>  0  </u> %		
109.	Dollar amount of long term mortgage (line 107 x 108)		\$ <u>  0  </u>
110.	Total Interest Cost on Long Term Financing		\$ _____
	a.	HUD-232 Financing (line 53)	\$ _____
	b.	Industrial Development Authority Revenue & General Revenue Bond Financing (line 79)	\$ _____
	c.	Conventional Loan Financing (line 94)	\$ _____
111.	Anticipated Bond discount		
	a.	HUD-232 Financing (line 53)	\$ _____
	b.	Industrial Development Authority Revenue & General Revenue Bond Financing (line 70)	\$ _____
	c.	Conventional Loan Financing (line 87)	\$ _____

<b>112. TOTAL CAPITAL AND FINANCING COST</b>		
<b>(ADD LINES 107, 110a, b or c AND 111a, b or c)</b>		<b>\$ <u>2,709,102</u></b>
D.	1. Estimated costs for new construction (excluding site acquisition costs)	\$ _____
	2. Estimated costs of modernization and renovation (excluding site acquisition costs)	\$ _____
E.	Anticipated Sources of Funds for Proposed Project	<u>Amount</u>
	1. Public Campaign	\$ _____
	2. Bond Issue (Specify Type) _____	\$ _____
	3. Commercial Loans	\$ _____
	4. Government Loans (Specify Type) _____	\$ _____
	5. Grants (Specify Type) _____	\$ _____
	6. Bequests	\$ _____
	7. Private Foundations	\$ _____
	8. Endowment Income	\$ _____
	9. Accumulated Reserves	\$ <u>2,709,102</u>
	10. Other (Identify) _____	\$ _____
F.	Describe in detail the proposed method of financing the proposed project, including the various alternatives considered. Attach any documents which indicate the financial feasibility of the project.	

**The proposed project will be funded through accumulated reserves.**

G. Describe the impact the proposed capital expenditure will have on the cost of providing care in the facility. Specify total debt service cost and estimated debt service cost per patient day for the first two (2) years of operation. (Total debt service cost is defined as total interest to be paid during the life of the loan (s). Estimate debt service cost per patient day by dividing estimated total patient days for year one into amount of debt service for that year. Repeat for year two.) Please attach an amortization schedule showing how the proposed debt will be repaid.

**Not applicable; the project is not being financed and thus will not impact the cost of care provided in the imaging center.**

H. Attach a copy of the following information of documents.

1. The existing and/or proposed room rate schedule, by type of accommodation.

**Not applicable.**

2. The audited annual financial statements for the past two (2) years of the existing facility or/if a new facility without operating experience, the financial state of the owner (s). Audited financial statements are required, if available.

**See Attachment V.H.2 – Audited Financial Statements.**

3. Copy of the proposed facility's estimated income, expense and capital budget for the first two years of operation after the proposed project is completed.

**See Attachment V.H.3 – Pro Forma.**

## SECTION VI ASSURANCES

I hereby assure and certify that:

- a. The work on the proposed project will be initiated within the period of time set forth in the Certificate of Public Need; and
- b. completion of the proposed project will be pursued with diligence; and
- c. the proposed project will be constructed, operated and maintained in full compliance with all applicable local, State and Federal laws, rules, regulations and ordinances.

I hereby certify that the information included in this application and all attachments are correct to the best of my knowledge and belief and that it is my intent to carry out the proposed project as described.

<small>DocuSigned by:</small>	
<u>Erik Shannon</u>	<u>8700 Sudley Road</u>
<small>FD79E824D1004AB</small>	
Signature of Authorizing Officer	Address – Line 1
<hr/>	
<u>Erik Shannon</u>	
Type/Print Name of Authorizing Officer	Address – Line 2
<hr/>	
Chief Executive Officer, UVA Community Health	<u>Manassas, VA</u>
Title of Authorizing Officer	City/State/Zip
<u>571-284-1161</u>	<u>20110</u>
Telephone	Date

**Copies of this request should be sent to :**

- A. **Virginia Department of Health  
Division of Certificate of Public Need  
9960 Mayland Drive – Suite 401  
Henrico, Virginia 23233**
- B. **The Regional Health Planning Agency if one is currently designated by the Board of Health to serve the area where the project would be located.**

Revised 02/24/2015

## **ATTACHMENTS**





*The* DEPARTMENT of RADIOLOGY & MEDICAL IMAGING

May 29, 2024

Karen Shelton, MD, FACOG  
State Health Commissioner  
Virginia Department of Health  
109 Governor Street  
Richmond, Virginia 23219

Dear Dr. Shelton:

I am the Chair of University of Virginia's Department of Radiology and Medical Imaging, and a Professor of Radiology and Neurosurgery at the University of Virginia School of Medicine. I wholeheartedly support UVA Health Outpatient Imaging Gainesville's COPN application to establish an imaging facility with MRI and other imaging services. There is a tremendous need for such a facility in the Gainesville area to better serve patients in this region.

Should this application be approved, the new facility will be staffed by members of the Department's Community Division, as well as by other UVA sub-specialty radiologists who provide image interpretation for abdominal, thoracic, breast, musculoskeletal, neuroradiology and pediatric radiology.

As a board-certified diagnostic and interventional neuroradiologist who has practiced for over twenty five years, I know that patients do not want to travel long distances to get the imaging that they need, nor do they (or their insurers) want to incur the higher costs of hospital- based imaging services. UVA Health Outpatient Imaging Gainesville will address both of these concerns: it will be community based, and, as an IDTF (Independent Diagnostic Testing Facility), it will provide a lower cost option than hospital-based imaging. An additional benefit of UVA Health Outpatient Imaging Gainesville will be its affiliation with the University of Virginia and its radiologists, who will offer professional services with expertise and perspective that only academic medicine can provide.

The quality of care and range of services to be offered at UVA Health Outpatient Imaging Gainesville, coupled with its proximity to communities in Prince William County and its relative affordability, will make this facility a highly desirable place for patients in PD8 to get medical imaging. I respectfully request that you approve UVA Health Outpatient Imaging Gainesville's application, and I thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "C P Derdeyn", with a stylized flourish at the end.

Colin P. Derdeyn, MD  
Professor and Chair,  
Department of Radiology and Medical Imaging

May 24, 2024

Karen Shelton, MD, FACOG  
State Health Commissioner  
Virginia Department of Health  
109 Governor Street, 13th Floor  
Richmond, VA 23219

Dear Dr. Shelton:

I am Adam Winick MD FSIR and I am the Vice Chair of the Department of Radiology and Medical Imaging at the University of Virginia in charge of the Community Division. Since we established our program in November of 2017, I have worked in our northern market to establish/implement our workflow and operationalize our coverage of the Radiology services for Prince William, Haymarket and Culpeper Hospitals. I wholeheartedly support UVA Health Outpatient Imaging Gainesville's COPN application to establish MRI services as an integral part of a full range of services to be offered in this new imaging facility in Gainesville. There is a tremendous need for free standing, lower cost imaging capacity to better serve patients in this region.

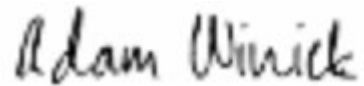
Should this application be approved, please be advised that UVA Health Outpatient Imaging Gainesville will be staffed by the University of Virginia's Department of Radiology Faculty on site, as well as by UVA sub-specialty radiologists who provide specialized reads for abdominal, thoracic, breast, musculoskeletal, neuroradiology and pediatric radiology remotely from Charlottesville.

I have been a physician for over 34 years, and I am a board-certified Interventional Radiologist. I frequently see patients in our office in Haymarket from the greater Gainesville community with complex conditions requiring MRIs. These patients generally do not want to travel long distances to get the imaging that they need, nor do they (or their insurers) want to incur the higher costs of hospital-based imaging services. UVA Health Outpatient Imaging Gainesville will address both of these concerns: it will be community based, and as an IDTF (Independent Diagnostic Testing Facility), it will provide a lower cost option than hospital-based imaging. An additional benefit of UVA Health Outpatient Imaging Gainesville is its affiliation with the University of Virginia and its radiologists, who will provide the professional services at this IDTF; this academic affiliation, which will bring high quality, skill and expertise to our community, will also help to facilitate the best outcomes for my patients.

The quality of care and range of services that will be offered at UVA Health Outpatient Imaging Gainesville, its proximity to Prince William and Haymarket Medical Centers and the neighboring communities, and its relative affordability, will make this facility a highly desirable

place for my patients to get their MRIs. I respectfully request that you approve UVA Health Outpatient Imaging Gainesville's application, and I thank you for your consideration of this important application.

Sincerely,

A handwritten signature in dark ink that reads "Adam Winick". The script is cursive and fluid, with the first name "Adam" and last name "Winick" clearly legible.

Adam B. Winick MD FSIR  
Associate Professor of Radiology and Medical Imaging  
Vice Chair, Community Radiology Division  
The University of Virginia Health System

**ATTACHMENT IV.B.2**

**Gainesville Year 1 Projected Volumes  
By Patient Zip Code**

Patient Zip Code	Locality	Projected MRI Volume (yr 1)	Cumulative Pct
20110	MANASSAS	407	16%
20155	GAINESVILLE	304	29%
20109	MANASSAS	302	41%
20169	HAYMARKET	255	51%
20136	BRISTOW	238	61%
20111	MANASSAS	136	66%
20187	WARRENTON	91	70%
20181	NOKESVILLE	90	74%
20112	MANASSAS	74	77%
20186	WARRENTON	46	79%
20105	ALDIE	38	80%
20115	MARSHALL	38	82%
22712	BEALETON	27	83%
20137	BROAD RUN	23	84%
22701	CULPEPER	23	85%
20119	CATLETT	20	86%
22554	STAFFORD	20	86%
22728	MIDLAND	18	87%
20176	LEESBURG	16	88%
22630	FRONT ROYAL	16	88%
22193	WOODBIDGE	15	89%
20143	CATHARPIN	14	90%
22556	STAFFORD	10	90%
22192	WOODBIDGE	8	90%
20198	THE PLAINS	8	91%
22191	WOODBIDGE	8	91%
20122	CENTREVILLE	7	91%
20121	CENTREVILLE	7	92%
20120	CENTREVILLE	7	92%
20106	AMISSVILLE	7	92%
Other Virginia Zip		196	100%
<b>Total</b>		<b>2,471</b>	

**ATTACHMENT IV.E**

## Statement of Consistency with the State Medical Facilities Plan

### Article 2 - Criteria and Standards for Magnetic Resonance Imaging

#### 12 VAC 5-230-140. Travel time.

MRI services should be within 30 minutes driving time one way under normal conditions of 95% of the population of the health planning district using a mapping software as determined by the commissioner.

**Although MRI services are available within 30 minutes driving time of 95% of the population of PD 8, there is nonetheless a public and institutional need for UVACH's proposal. See COPN Application, Section IV.A. The proposed Imaging Gainesville outpatient diagnostic facility will be outfitted with an approved MRI unit to be relocated from Imaging Centreville. The Commissioner authorized this unit in 2021 based on high utilization of Imaging Centreville's existing MRI unit and UVACH's institutional need to better serve patients in the service area.<sup>1</sup> Reallocation of this approved MRI inventory to Gainesville in western Prince William County, a key part of both UVACH's and Imaging Centreville's PSAs, will better serve existing UVACH patients and bring a broad range of low-cost outpatient imaging services to western PD 8. Indeed, the majority of MRI services is located in eastern PD 8.<sup>2</sup> The proposed imaging center would be located in the westernmost part of PD 8, home to approximately 20% of the PD's population yet currently lacking convenient lower-cost options to hospital-based imaging. For those residents, the nearest outpatient imaging services offered outside of the hospital settings of PWMC and HAMC are at least ten miles away. The reallocation would optimize utilization of both MRI units currently approved for Imaging Centreville and better serve the goals underpinning the Commissioner's approval of the second MRI for the facility.**

#### 12 VAC 5-230-150. Need for new fixed site service.

No new fixed site MRI services should be approved unless fixed site MRI services in the health planning district performed an average of 5,000 procedures per existing and approved fixed site MRI scanner during the relevant reporting period and the proposed new service would not significantly reduce the utilization of existing fixed site MRI providers in the health planning district. The utilization of existing scanners operated by a hospital and serving an area distinct from the proposed new service site may be disregarded in computing the average utilization of MRI scanners in such health planning district.

**Not applicable; UVACH does not propose here the implementation of a new fixed MRI unit but rather the relocation of an approved MRI unit to a new location within the same service area to serve existing UVACH patients. In any event, there is a utilization-based need to maintain the approved MRI within the UVACH inventory, yet to place it in the western part of UVACH's service area. UVACH performed 6,754 MRIs in 2023, up from 6,531 in 2022**

<sup>1</sup> COPN No. VA-04752, issued 8/16/2021.

<sup>2</sup> See Map of MRI Facilities, COPN Application at 22.

**and 5,866 in 2021. It currently operates at 135% of the SMFP's capacity threshold, based on one operational MRI. HAMC's 2023 utilization of its one MRI unit put it at 94% of the SMFP's capacity threshold in 2023. And while PWMC's 5,325 scans in 2023 (on two scanners) are not near capacity, relocation would leave that facility with just one scanner operating above the SMFP's threshold. This proposal maintains the current UVACH MRI inventory but reallocates one scanner to a location more accessible for a sizable, and relatively underserved, portion of Imaging Centreville's and UVACH's PSAs.**

12 VAC 5-230-160. Expansion of fixed site service.

Proposals to expand an existing medical care facility's MRI services through the addition of an MRI scanner may be approved when the existing service performed an average of 5,000 MRI procedures per scanner during the relevant reporting period. The commissioner may authorize placement of the new unit at the applicant's existing medical care facility, or at a separate location within the applicant's primary service area for MRI services, provided the proposed expansion is not likely to significantly reduce the utilization of existing providers in the health planning district.

**Not applicable; UVACH does not propose here the expansion of MRI services through the addition of a new scanner but rather the relocation of an approved MRI unit to a new location in the PSA of Imaging Centreville and the UVACH PD 8 facilities' PSAs to serve a portion of substantially the same service area and patients.**

12 VAC 5-230-170. Adding or expanding mobile MRI services.

A. Proposals for mobile MRI scanners shall demonstrate that, for the relevant reporting period, at least 2,400 procedures were performed and that the proposed mobile unit will not significantly reduce the utilization of existing MRI providers in the health planning district.

B. Proposals to convert authorized mobile MRI scanners to fixed site scanners shall demonstrate that, for the relevant reporting period, 3,000 procedures were performed by the mobile scanner and that the proposed conversion will not significantly reduce the utilization of existing MRI providers in the health planning district.

**Not applicable.**

12 VAC 5-230-180. Staffing.

MRI services should be under the direct supervision of one or more qualified physicians.

**All MRI services to be provided at Imaging Gainesville will be provided under the supervision of radiologists with faculty appointments at the University of Virginia School of Medicine. All of these radiologists are appropriately trained and credentialed to direct and supervise the proposed MRI services.**



## **ATTACHMENT IV.H.2**



May 20, 2024

Karen Shelton, MD, FACOG  
State Health Commissioner  
Virginia Department of Health  
109 Governor Street, 13th Floor  
Richmond, VA 23219

**RE: UVA Health Outpatient Imaging Gainesville**

Dear Dr. Shelton:

I write to express my wholehearted support for the COPN application of UVA Outpatient Imaging Centreville LLC to establish a free-standing MRI service at 7454 Limestone Drive, Gainesville, Virginia. This new MRI would be located within a new, full-service imaging center.

There is a great need for such a facility in the Gainesville area. I am a Board of County Supervisor in Prince William County. I have seen firsthand the diverse and changing needs of the Gainesville community, and I understand the important role that UVA Outpatient Imaging Gainesville will play in their healthcare.

This new facility will be the first free standing imaging facility offering MRI services in the Gainesville area. It will greatly benefit residents seeking a lower cost alternative to hospital-based imaging that is also closer to home, with the added benefit of professional care provided by radiologists affiliated with the University of Virginia. I fully support the introduction of this new resource to our community, and I respectfully request that you approve this project.

Thank you for your consideration of this letter. Please let me know if you have any questions.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Tom Gordy", with a stylized flourish at the end.

Supervisor Tom Gordy  
Brentsville Magisterial District  
Prince William County



Karen Shelton, MD, FACOG  
State Health Commissioner  
Virginia Department of Health  
109 Governor Street, 13th Floor  
Richmond, VA 23219

May 20, 2024

Dear Dr. Shelton:

I am writing to express my wholehearted support for the COPN application of UVA Outpatient Imaging Centreville LLC to establish a free-standing MRI service at 7454 Limestone Drive, Gainesville, Virginia. This new MRI would be located within a new, full-service imaging center.

There is a great need for such a facility in the Gainesville area. I am the President & CEO of the Prince William Chamber of Commerce. We are the largest Chamber in the Commonwealth representing over 1,400 businesses and 100,000 employees. I have seen firsthand the diverse and changing needs of the Gainesville community, and I understand the important role that UVA Outpatient Imaging Gainesville will play in their healthcare.

This new facility will be the first free standing imaging facility offering MRI services in the Gainesville area. It will greatly benefit residents seeking a lower cost alternative to hospital-based imaging that is also closer to home, with the added benefit of professional care provided by radiologists affiliated with the University of Virginia. I fully support the introduction of this new resource to our community, and I respectfully request that you approve this project.

Thank you for your consideration of this letter. Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, consisting of the letters "RJS" in a stylized, cursive-like font.

President & CEO  
Prince William Chamber of Commerce

9733 Buchanan Loop; Manassas, VA 20110

Via email: [COPN@vdh.virginia.gov](mailto:COPN@vdh.virginia.gov)

May 15, 2024

Karen Shelton, MD, FACOG  
State Health Commissioner  
Virginia Department of Health  
109 Governor Street, 13th Floor  
Richmond, VA 23219

**RE: UVA Health Outpatient Imaging Gainesville**

Dear Dr. Shelton:

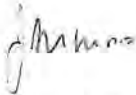
I am a family medicine physician and have been practicing for 23 years. I am currently a member of the medical staffs at UVA Prince William Medical Center and UVA Haymarket Medical Center and maintain offices in Haymarket.

I write to express my wholehearted support for the COPN application of UVA Outpatient Imaging Centreville LLC to establish a free-standing MRI service in Gainesville, Virginia. This new MRI would be located within a new, full-service imaging center that would also include CT. There is a great need for such a facility in the Gainesville area, and it will greatly benefit my patients who need accurate diagnoses and treatment plans.

Importantly, this new facility will be the first IDTF in the Gainesville area. For my patients who are seeking imaging services closer to home, with radiologists affiliated with the University of Virginia, this new center will offer a high quality, lower cost alternative to hospital based imaging. I fully support the introduction of this new resource to our community, and I respectfully request that you approve this project.

Thank you for your consideration of this letter. Please let me know if you have any questions.

Very truly yours,



James Min, MD

# WILLIAMS MULLEN

Direct Dial: 804.420.6423  
jlignon@williamsmullen.com

July 10, 2024

## VIA ELECTRONIC MAIL

Ms. Sharon K. Honaker, Project Review Analyst  
Division of Certificate of Public Need  
Virginia Department of Health  
9960 Mayland Drive, Suite 401  
Richmond, Virginia 23233-1463

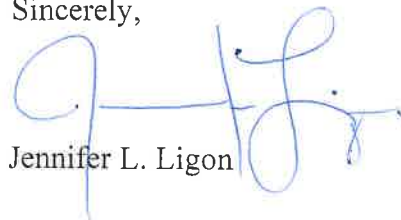
**Re: COPN Request No. VA-8768  
UVA Outpatient Imaging Centreville, LLC d/b/a  
UVA Health Outpatient Imaging Gainesville  
Planning District 8  
Establish a Medical Care Facility for MRI Imaging with One Relocated MRI  
Scanner**

Dear Ms. Honaker:

On behalf of UVA Outpatient Imaging Centreville, LLC d/b/a UVA Health Outpatient Imaging Gainesville ("Imaging Gainesville"), enclosed please find responses to the Supplemental Questions/Discussion Points provided by the Health Systems Agency of Northern Virginia and the Division of Certificate of Public Need relating to the above-referenced Certificate of Public Need application. An attachment containing the requested patient origin data and an additional letter of support for the project also are enclosed.

Thank you for your review of the Imaging Gainesville application. Please let me know of any questions or if we can provide additional information.

Sincerely,



Jennifer L. Ligon

Enclosures

cc: Mr. Erik O. Bodin, III, Director, Division of Certificate of Public Need  
Mr. Dean Montgomery, Executive Director, Health Systems Agency of Northern Virginia  
Ms. Donna Staton, Chief Operating Officer, UVA Community Health

**Virginia Department of Health  
Office of Licensure and Certification  
Division of Certificate of Public Need**

COPN Request No. VA-8768  
UVA Outpatient Imaging Centreville, LLC d/b/a  
UVA Health Outpatient Imaging Gainesville  
Planning District 8  
Establish a Medical Care Facility with one relocated  
MRI scanner

**Supplemental Questions / Discussion Points  
Consolidated List of Questions with Health Systems Agency of Northern Virginia  
(HSANV)**

*The following questions are keyed to the **Roman numeral sections and letter and number-designated subsections** of the Certificate of Public Need (COPN) application form. Questions are further identified by a **number in parentheses** when there is more than one question for a particular subsection of the application form.*

**SECTION I: FACILITY ORGANIZATION AND IDENTIFICATION**

No questions.

**SECTION II: ARCHITECTURE AND DESIGN**

No questions.

**SECTION III: SERVICE DATA**

No questions.

**SECTION IV: PROJECT JUSTIFICATION AND IDENTIFICATION OF COMMUNITY  
NEED**

1. Please provide complete recent (2022 and/or 2023) MRI patient origin by zip code for each of the UVA facilities operated in PD 8.

**See 2023 UVACH MRI Patient Origin by Facility and ZIP – Response to Completeness Question IV.A.**

2. Please provide data/information comparing hospital and IDTF MRI charges like the comparative information provided for CT charges (Table 7 in COPN Request No. VA-8769).

See below.

**Comparison of Hospital-Based v. IDTF Charges for MRI Services<sup>1</sup>**

<b>MRI Procedure by CPT Code</b>	<b>Haymarket Medical Center charge</b>	<b>IDTF charge</b>
<b>70551 Brain without contrast</b>	<b>\$2,700</b>	<b>\$1,690</b>
<b>72197 Pelvis with and without contrast</b>	<b>\$4,396</b>	<b>\$3,530</b>
<b>74183 Abdomen with and without contrast</b>	<b>\$4,011</b>	<b>\$3,530</b>
<b>70553 Brain with and without contrast</b>	<b>\$4,774</b>	<b>\$3,580</b>
<b>72141 C-spine without contrast</b>	<b>\$2,700</b>	<b>\$1,710</b>
<b>73721 Joint lower extremity with and without contrast</b>	<b>\$1,685</b>	<b>\$1,650</b>
<b>72148 Lumbar spine without contrast</b>	<b>\$2,924</b>	<b>\$1,840</b>

3. Are there plans or a likelihood that UVA Health Outpatient Imaging Gainesville will be syndicated, offering minority interests to physician investors?

**The applicant is wholly owned by UVA Prince William Health System, which is a wholly owned subsidiary of UVA Community Health, Inc. No physician ownership in the facility is anticipated, and there are no plans to syndicate the facility.**

4. See Supplement to Section IV.H.2: Additional Letter of Support.

**SECTION V: FINANCIAL DATA**

No questions.

**VI: ASSURANCES**

No questions.

**MISCELLANEOUS**

No questions.

---

<sup>1</sup> Illustrative list of common CPT codes anticipated to be performed at Imaging Gainesville.



**IAN T. LOVEJOY**

8665 SUDLEY ROAD  
BOX 195  
MANASSAS, VIRGINIA 20110  
TWENTY-SECOND DISTRICT

COMMONWEALTH OF VIRGINIA

**HOUSE OF DELEGATES**  
RICHMOND

COMMITTEE ASSIGNMENTS:  
COUNTIES, CITIES AND TOWNS  
COMMUNICATIONS, TECHNOLOGY  
AND INNOVATION

May 20, 2024

Karen Shelton, MD, FACOG  
State Health Commissioner  
Virginia Department of Health  
109 Governor Street, 13th Floor  
Richmond, VA 23219

RE: UVA Health Outpatient Imaging Gainesville

Dear Dr. Shelton:

I write to express my wholehearted support for the COPN application of UVA Outpatient Imaging Centreville LLC to establish a free-standing MRI service at 7454 Limestone Drive, Gainesville, Virginia. This new MRI would be located within a new, full-service imaging center.

There is a great need for such a facility in the Gainesville area. I am a member of the Virginia House of Delegates representing this area, and I have seen firsthand the diverse and changing needs of the Gainesville community, and I understand the important role that UVA Outpatient Imaging Gainesville will play in their healthcare.

This new facility will be the first free standing imaging facility offering MRI services in the Gainesville area. It will greatly benefit residents seeking a lower cost alternative to hospital-based imaging that is also closer to home, with the added benefit of professional care provided by radiologists affiliated with the University of Virginia. I fully support the introduction of this new resource to our community, and I respectfully request that you approve this project.

Thank you for your consideration of this letter. Please let me know if you have any questions.

Very truly yours,

A handwritten signature in cursive script, reading "Ian Lovejoy".

Delegate Ian T. Lovejoy  
Virginia House of Delegates District 22