

VIRGINIA DEPARTMENT OF HEALTH

Office of Licensure and Certification

Division of Certificate of Public Need

Staff Analysis

March 23, 2026

RE: COPN Request No. VA-8859

HCA Health Services of Virginia, Inc.

Henrico, Virginia

Establish a Medical Care Facility with One (1) CT Scanner

RE: COPN Request No. VA-8860

Chippenham & Johnston-Willis Hospitals, Inc.

Richmond, Virginia

Establish a Medical Care Facility with One (1) CT Scanner

Applicant

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors' Hospital

HCA Health Services of Virginia, Inc. ("HCA Virginia") is a for-profit, Virginia stock corporation. Henrico Doctors' Hospital ("Henrico Doctors") is an affiliate of HCA Virginia and will be the sole owner of the proposed project of White Oak ER. The facility will be under the license of Henrico Doctors' Forest ("HDH Forest"). Henrico Doctors' Hospital has three hospital locations; however, the proposed project will not be on one of the campuses. The site of the proposed project will be a free-standing Emergency Room (ER) at 4415 S. Laburnum in Henrico County, Health Planning Region (HPR) IV, Planning District (PD) 15.

VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

Chippenham & Johnston-Willis Hospitals, Inc. ("Chippenham & Johnston-Willis") is a proprietary stock corporation owned by HCA, Inc. Chippenham & Johnston-Willis was formed in 1995 from the partnership of Johnston Willis and Chippenham Hospitals. These two hospitals, although separately licensed, are considered one medical center with two campuses. The site of the proposed project is not attached to either campus, instead it is in a freestanding Emergency Room (ER) at 3830 Hull Street Road, in the City of Richmond, Virginia, HPR IV, PD 15.

Background

Henrico County and the City of Richmond are in PD 15 along with Charles City County, Chesterfield County, Goochland County, Hanover County, New Kent County and Powhatan County. The total population of the PD is predicted to grow by 8.9% between 2020 and 2030 with

the adult population growing approximately 9.5% and the population of people over the age of 65 growing 31.7% (Table 1).

Henrico County’s total population is expected to increase by 6.7% to approximately 356,565 people between 2020 and 2030 (Table 1). The increase is less than the expected population growth rate for the PD overall (8.9%), but greater than the expected growth rate of the state (5.8%). Henrico County, where one of the proposed projects is located, is expected to have the second-highest population of the PD in total population, as well as adults and individuals over the age of 65 by 2030. The county is geographically located around the independent City of Richmond, where the other proposed project is located.

The City of Richmond reported a population of 226,610 in the 2020 census, and the population is expected to be approximately 245,437 people in 2030, an 8.3% increase (Table 1). This growth will keep the city as the third most populous locality in the PD.

Table 1: Predicted Population Change of PD 15

Location	Experienced 2020			Predicted 2030			2020-2030 Change		
	Total	18+	65+	Total	18+	65+	Total	18+	65+
Charles City County	6,773	5,785	1,776	6,200	5,349	2,184	-8.5%	-7.5%	23.0%
Chesterfield County	364,548	277,149	58,200	406,942	311,402	78,858	11.6%	12.4%	35.5%
Goochland County	24,727	20,484	5,721	27,339	22,791	7,865	10.6%	11.3%	37.5%
Hanover County	109,979	85,947	20,688	118,374	93,446	28,681	7.6%	8.7%	38.6%
Henrico County	334,389	259,925	55,596	356,656	280,105	71,680	6.7%	7.8%	28.9%
New Kent County	22,945	18,235	4,405	27,067	21,546	6,216	18.0%	18.2%	41.1%
Powhatan County	30,333	24,045	5,848	32,152	25,757	8,085	6.0%	7.1%	38.2%
City of Richmond	226,610	184,420	29,874	245,437	199,119	36,307	8.3%	8.0%	21.5%
PD15	1,120,304	875,990	182,108	1,220,168	959,515	239,874	8.9%	9.5%	31.7%
Virginia	8,631,393	6,729,459	1,395,291	9,129,002	7,173,130	1,762,641	5.8%	6.6%	26.3%

Source: Weldon-Cooper Center for Public Service

A computed tomography (CT) scan is a computerized X-ray imaging tool that produces images of the body to diagnose diseases or lesions in the body. The patient lies in a CT machine, and the X-ray source completes a rotation around the body, documenting the skeleton, organs, and tissues¹. CT scanners have varying depths, usually ranging from 1-10 millimeters. Whereas other X-rays provide two-dimensional (2D) images, a CT scan will produce a three-dimensional (3D) image of the body and can provide a multiple-angle perspective for a scanned area².

There were 46 CT scanners in PD 15 that reported to Virginia Health Information (VHI) in 2024, the last year for which data was available. Overall, in the PD, the CT scanners reported usage of 135.2% of the State Medical Facilities Plan (SMFP) threshold (Table 2).

¹ “Computed Tomography (CT).” *National Institute of Health*, National Institute of Biomedical Imaging and Bioengineering, July 2025, www.nibib.nih.gov/science-education/science-topics/computed-tomography-ct.

² Fayad, Laura M. “CT Scan versus MRI versus X-ray: What Type of Imaging Do I Need?” *Johns Hopkins Medicine*, Johns Hopkins Medicine, 29 Aug. 2025, www.hopkinsmedicine.org/health/treatment-tests-and-therapies/ct-vs-mri-vs-xray.

Table 2: PD 15 CT Scanners Reporting to VHI (2024)

Facility Name	Total Stationary Units	Total CT Procedures	Utilization
Bon Secours Imaging Center at Reynolds Crossing	1	3,507	47.4%
Bon Secours Memorial Regional Medical Center	3	46,765	210.7%
Bon Secours Richmond Community Hospital	1	7,655	103.4%
Bon Secours St. Francis Medical Center	2	33,824	228.5%
Bon Secours St. Mary's Hospital	3	43,892	197.7%
Bon Secours Westchester Imaging Center	1	3,983	53.8%
ED - Bon Secours Westchester		5,539	74.9%
Chesterfield Imaging	1	6,599	89.2%
Chippenham Hospital	3	55,556	250.3%
ED - Bon Secours Chester Emergency Center	1	9,478	128.1%
ED - Bon Secours Short Pump	1	12,299	166.2%
ED - Hanover Emergency Center	1	4,217	57.0%
ED - VCU	1	6,403	86.5%
ED - Swift Creek ER ³	1	7,862	106.2%
Henrico Doctors' Hospital - Forest	2	38,395	259.4%
Henrico Doctors' Hospital - Parham	1	13,913	188.0%
Henrico Doctors' Hospital - Retreat	1	4,145	56.0%
Independence Park Imaging ⁴	1	4,901	66.2%
Johnston-Willis Hospital	3	37,560	169.2%
MedRVA Imaging Center	1	958	12.9%
NOW Neuroscience, Orthopedic and Wellness Center	1	5,789	78.2%
Richmond Ear Nose and Throat	1	302	4.1%
Urosurgical Center of Richmond	2	8,885	60.0%
VCU Medical Center ⁵	9	84,972	127.6%
VCU Medical Center at Stony Point Radiology	1	7,001	94.6%
Virginia Cancer Institute - Discovery Drive	1	5,647	76.3%
Virginia Cancer Institute - Harbourside	1	5,052	68.3%
Virginia Cardiovascular Specialists, PC	1	5,092	68.8%
PD 15 Total	46	470,191	135.2%

Source: VHI Data

VCU Massey Cancer Center at Hanover Medical Park is authorized for one fixed CT scanner⁶ as well. The certificate was indefinitely extended, following the facility becoming operational on May 8, 2017. The location has not reported CT utilization data to VHI.

There are an additional four CT scanners at existing facilities which are authorized but have not yet started services. Bon Secours St. Mary's Hospital was authorized an additional CT scanner,

³ The Swift Creek ER CT scanner is relocating to the Magnolia Hospital (authorized by COPN VA-04981).

⁴ The CT scanner at Independence Park Imaging was replaced and relocated to Short Pump Imaging, LLC, via COPN VA- 04823. Independence Park Imaging is not authorized for the provision of CT scans as of Nov. 15, 2024.

⁵ The VCU Medical Center VHI reporting includes the VCU Hospital (8 scanners) and the VCU Medical Adult Outpatient Pavilion (1 scanner) as the two reported utilization together to VHI for 2024 data.

⁶ COPN VA-04546

for a total of 4⁷. The proposed project is expected to be completed on July 31, 2026. Henrico Doctors’ Hospital- Forest (HDH Forest) was authorized for an additional CT scanner, for a total of 3⁸. The proposed project is expected to be completed in June 2026.

VCU Medical Center was authorized two additional CT scanners, for a total of 11 on the campus. One was authorized via COPN VA-4760 and was placed in the Children’s Tower on the main campus along with an MRI scanner. This project was completed in 2025. The second scanner was authorized via COPN VA-04935 at the VCU Medical Center Adult Outpatient Pavilion and is expected to be completed on February 1, 2026.

Table 3: CT Scanners at Facilities Authorized but Not Reporting to VHI

Facility	Fixed Units	COPN Certificate	Service Start Date Expected	Street Address	County
Virginia Ear Nose & Throat - Midlothian	1	VA-04979	2/28/2026	15350 East West Rd	Chesterfield
Ironbridge ER	1	VA-04840	6/1/2026	9630 and 9640 Iron Bridge Rd	Chesterfield
Magnolia Hospital	1 ⁹	VA-04982	10/13/2029	16100, 16300 & 16500 Hull Street Rd	Chesterfield
Cardiology of Virginia	1	VA-04978	6/1/2026	13572 Waterford Place	Chesterfield
Scott's Addition ER	1	VA-04811	1/1/2027	3054 North Arthur Ashe Blvd	City of Richmond
Bon Secours St. Francis (Imaging Center)	1	VA-04983	12/31/2027	5201 Chippenham Crossing Center	City of Richmond
Pauley Heart Center Pavilion at VCU Health	1	VA-04953	4/30/2028	1505 Robin Hood Rd	City of Richmond
Chesterfield Hospital	1	VA-04981	5/30/2030	7220 Beach Rd	Chesterfield
Scanners Approved Not Providing Services	9				
Facility	Fixed Units	COPN Certificate	Service Start Date ¹⁰	Street Address	County
Virginia Ear Nose & Throat – West End	1	VA-04409	7/18/24	3450 Mayland Court	Henrico
Short Pump, LLC	1	VA-04823	11/15/24	12402 West Broad Street	City of Richmond
OrthoVirginia	1	VA-04876	10/06/2025	7858 Shrader Rd	City of Richmond
Bon Secours Ashland Emergency and Imaging Center	1	VA-04864	11/18/25	1140 North Lakeridge Pkwy	Hanover
Scanners Providing Services Not Reporting	3				
Total Additional Scanners	12				

Source: DCOPN Inventory

⁷ COPN VA-04899

⁸ COPN VA-04925

⁹ The CT scanner is being relocated from Swift Creek ER.

¹⁰ The dates in this portion of the table have been confirmed via the Indefinite Extensions that the facilities have filed. Some of the dates in the portion of the table above have passed (ex: OrthoVirginia, etc.), but an Indefinite Extension has not been submitted with confirmed start of services.

There are 12 additional scanners that have been authorized but are not yet reporting data to VHI. Of the scanners, nine have not yet started providing services, and three started providing imaging services but were not in the 2024 VHI report (**Table 3**). Six out of the twelve were authorized for the City of Richmond, five for Chesterfield, and one each for Hanover and Henrico respectively. With the additional and relocated scanners, there are a total of 61 authorized CT scanners in the PD (**Table 4**). Should the volume of procedures remain the same as the 2024 volume, there would be a 104.2% utilization of scanners in the PD once all authorized projects are completed.

Table 4: CT Scanners in PD 15 After Completion of All Authorized Projects

Facilities	Fixed Units	Facilities	Fixed Units
Bon Secours Imaging Center at Reynolds Crossing	1	Bon Secours Ashland Emergency and Imaging Center	1
Bon Secours Memorial Regional Medical Center	3	Bon Secours St. Francis (Imaging Center)	1
Bon Secours Richmond Community Hospital	1	Cardiology of Virginia	1
Bon Secours St. Francis Medical Center	2	VCU Chesterfield Hospital	1
Bon Secours St. Mary's Hospital	4	Iron Bridge ER	1
Bon Secours Westchester Imaging Center	1	Magnolia Hospital ¹¹	1
ED - Bon Secours Westchester		OrthoVirginia	1
Chesterfield Imaging	1	Pauley Heart Center Pavilion at VCU Health	1
Chippenham Hospital	3	Scott's Addition ER	1
ED - Bon Secours Chester Emergency Center	1	Short Pump, LLC	1
ED - Bon Secours Short Pump	1	Virginia Ear Nose & Throat - Midlothian	1
ED - Hanover Emergency Center	1	Virginia Ear Nose & Throat - West End	1
ED- VCU at Pocahontas Trail	1		
Henrico Doctors' Hospital - Forest	3		
Henrico Doctors' Hospital - Parham	1		
Henrico Doctors' Hospital - Retreat	1		
Johnston-Willis Hospital	3		
MedRVA Imaging Center	1		
NOW Neuroscience, Orthopedic and Wellness Center	1		
Richmond Ear Nose and Throat	1		
Urosurgical Center of Richmond	2		
VCU Medical Center	11		
VCU Medical Center Adult Outpatient Pavilion	1		
VCU Medical Center at Stony Point Radiology	1		
Virginia Cancer Institute - Discovery Drive	1		
Virginia Cancer Institute - Harbourside	1		
Virginia Cardiovascular Specialists, PC	1		
PD 15 CT Scanners	61		

Source: DCOPN Inventory

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors' Hospital

Henrico Doctors' has three hospital locations within Henrico County: HDH Forest, Henrico Doctors' Hospital- Parham (HDH Parham), and Henrico Doctors' Hospital- Retreat (HDH Retreat).

¹¹ The applicant confirmed that the CT scanner at Swift Creek ER will be directly relocated to Magnolia Hospital. The Magnolia ER project that was originally authorized for the scanner is no longer occurring per a March 16 email from the applicant's representative.

There are two freestanding ERs that are also connected to the hospitals: Hanover Emergency Center and Scott’s Addition ER. Scott’s Addition ER¹² is expected to begin imaging services in January of 2027 (**Table 3**). As stated above, HDH Forest was approved a third CT scanner which is expected to begin imaging services in June 2026. Of Henrico Doctors’ five scanners reporting volumes, there was an average of 164.0% utilization in 2024. If the total scan volume of all scanners in operation was the same after the completion of the projects, the utilization would be 117.1% (**Table 5**).

Table 5: Utilization of Associated CT Scanners

Location	Fixed Scanner	2024 Scans	2024 Utilization
Henrico Doctors' Hospital - Forest	3 ¹³	38,395	259.4%
Henrico Doctors' Hospital - Parham	1	13,913	188.0%
Henrico Doctors' Hospital - Retreat	1	4,145	56.0%
ED - Hanover Emergency Center	1	4,217	57.0%
ED- Scotts Addition	1	-	-
Reporting Total	5	60,670	164.0%
Authorized Total	7	60,670	117.1%

Source: VHI Data, DCOPN Inventory

VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

Chippenham & Johnston-Willis is a subsidiary of HCA Virginia. Chippenham & Johnston-Willis is currently authorized for six CT scanners, with three located at the Chippenham campus and three located at the Johnston-Willis campus. Chippenham & Johnston-Willis was recently authorized¹⁴ for the establishment of a specialized imaging center at Iron Bridge ER. The ER is expected to start services in June 2026¹⁵ (**Table 3**). The CT scanner currently located at the Swift Creek ER will be relocated to Magnolia Hospital¹⁶, which is projected to be completed in October 2029. The scanner was originally planned to move to the Magnolia ER, but with the authorization of the hospital, the Magnolia ER project will not be continued. The scanner will move directly from the Swift Creek ER to the Magnolia Hospital¹⁷. Of the seven Chippenham & Johnston-Willis scanners reporting volumes, there is an average utilization of 194.7% of the SMFP threshold for CT expansion in 2024. If the total scan volume was the same with all scanners in operation, the utilization would be 170.4% (**Table 6**).

¹² COPN VA-04811

¹³ The hospital is authorized for three scanner; however, in 2024 only two were providing services.

¹⁴ COPN VA-04840

¹⁵ The applicant submitted a significant change request on March 11, 2026, with an extended date from the original March 1, 2026, deadline.

¹⁶ COPN VA-04982

¹⁷ Stallings, Thomas. “COPN No. VA-04862.” Email to DCOPN, 16 March. 2026

Table 6: Utilization of Associated CT Scanners

Location	Fixed Scanner	2024 Scans	2024 Utilization
Chippenham Hospital	3	55,556	250.3%
Johnston-Willis Hospital	3	37,560	169.2%
ED- Swift Creek ER	1	7,862	106.2%
ED- Iron Bridge ER	1	-	-
Reporting Total	7	100,878	194.7%
Authorized Total	8	100,878	170.4%

Source: VHI Data, DCOPN Inventory

Proposed Project

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors’ Hospital

Henrico Doctors’ is applying to establish a specialized imaging center to provide CT imaging services. The total capital cost of the proposed project is estimated to be \$1,212,973 (**Table 7**). Miscellaneous costs, referenced in **Table 7**, include the lease of the site pro rata, site preparation, testing, and building fees as described in the application. The proposed project will be funded through accumulated reserves of HCA Virginia; it is not expected to impact care already being provided.

Table 7: Total Capital Costs

Direct Construction	\$ 347,000
Equipment Not Included	\$ 560,000
Misc. Costs	\$ 281,973
Architect and Engineering Fees	\$ 24,000
Sub-Total	\$ 1,212,973

Source: COPN Request No. VA-8859

The scanner will be located within the White Oak ER, a freestanding emergency room (ER), to be located at 4415 S. Laburnum Avenue in East Henrico¹⁸. Henrico Doctors’ stated that the White Oak ER will “alleviate demand” at the HDH Forest hospital and ER as well as scanners at HDH Parham¹⁹. HDH Forest is approximately 12 miles from the proposed facility’s location and HDH Parham is approximately 13 miles away. Both locations are in Henrico County, west of the City of Richmond, while White Oak ER is in Henrico County but east of the City of Richmond.

It is important to note that DCOPN does not regulate ERs, and this report will solely focus on the introduction of the CT scanner. The applicant states that CT imaging services will begin 27 months after receiving the COPN certificate. Should a certificate be awarded upon the currently

¹⁸ The applicant originally proposed a location of 4306 S. Laburnum, however changed location in an email on March 6, prior to the public hearing held on March 10, 2026. This increased the price as well.

¹⁹ While the proposed project may alleviate the demand of HDH Parham, for the institutional need portion of the analysis, HDH Forest is solely considered as it will be under that location’s license.

scheduled decision date of May 11, 2026, the proposed project will be complete around August 27, 2028.

VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

Chippenham & Johnston-Willis is applying to establish a specialized imaging center for the provision of CT services. The proposed project is expected to cost approximately \$1,001,174 (**Table 8**), which will be paid through the internal reserves of HCA Healthcare. The cost of the proposed project is not expected to impact on care already being provided at other locations. Miscellaneous costs, referenced in **Table 8**, include the lease of the site pro rata, site preparation, testing, and building fees as described in the application.

Table 8: Total Capital Costs

Direct Construction	\$ 282,000
Equipment Not Included	\$ 560,000
Miscellaneous Costs	\$ 140,174
Architect and Engineering Fees	\$ 19,000
Total	\$ 1,001,174

Source: COPN Request No. VA-8860

The scanner will be located within the South Richmond ER, a freestanding ER to be located in South Richmond. Chippenham & Johnston-Willis states that the creation of the ER will reduce overutilization of the scanners on the Chippenham Hospital campus and increase availability for imaging services.

It is important to note that DCOPN does not regulate ERs, and this report will solely focus on the introduction of the CT scanner. The applicant states that CT imaging services will begin 31 months after receiving the COPN certificate. Should a certificate be awarded upon the currently scheduled decision date of May 11, 2026, the proposed project will be complete around December 27, 2028.

Project Definition

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors' Hospital and VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

Section 32.1-102.1:3 of the Code of Virginia defines a project, in part, as the “[e]stablishment of a medical care facility.” A medical care facility is defined, in part, as “[a]ny specialized center or clinic or that portion of a physician's office developed for the provision of...computed tomographic (CT) scanning”.

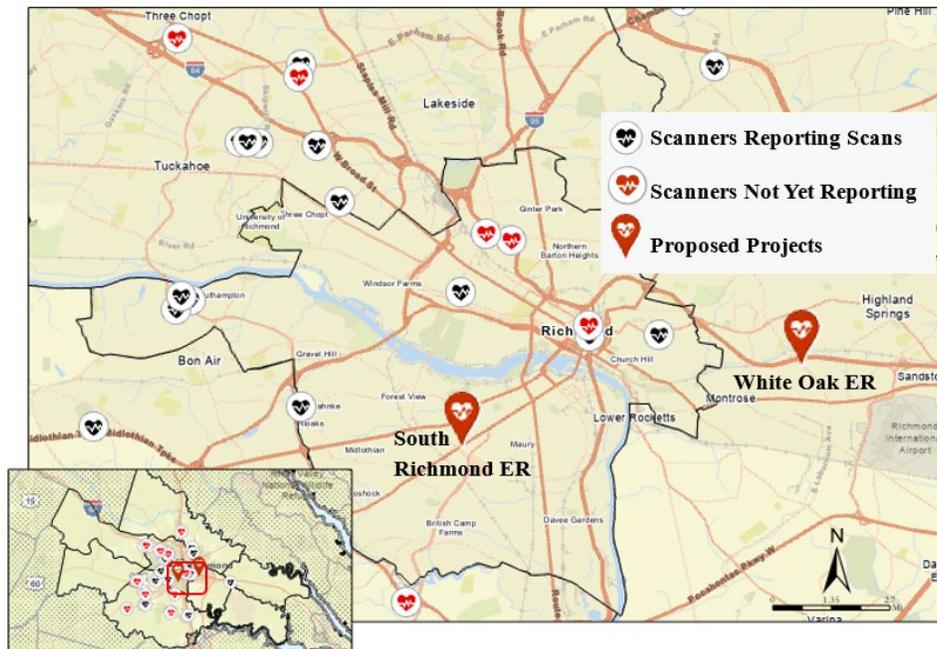
Required Considerations -- § 32.1-102.3, of the Code of Virginia

In determining whether a public need exists for a proposed project, the following factors shall be taken into account when applicable.

1. The extent to which the proposed service or facility will provide or increase access to needed services for residents of the area to be served, and the effects that the proposed service or facility will have on access to needed services in areas having distinct and unique geographic, socioeconomic, cultural, transportation, and other barriers to access to care.

Map 1 shows the location of authorized CT scanners in PD 15. A zoomed-out map in the bottom left corner, shows all scanners in the PD, while the larger map focuses on the area closer to where the proposed projects will be located within the PD. Symbols with red hearts represent locations where scanners are authorized, but either the proposed projects are not yet complete, or the proposed projects are complete but data has not yet been reported to VHI. Symbols with the black hearts represent locations where authorized scanners are reporting data to VHI.

Map 1: Authorized CT Scanners and Proposed Projects (PD 15)



Source: ArcGIS, DCOPN Inventory, VHI Records

Table 9: PD 15 Estimated Population in Poverty (2024)

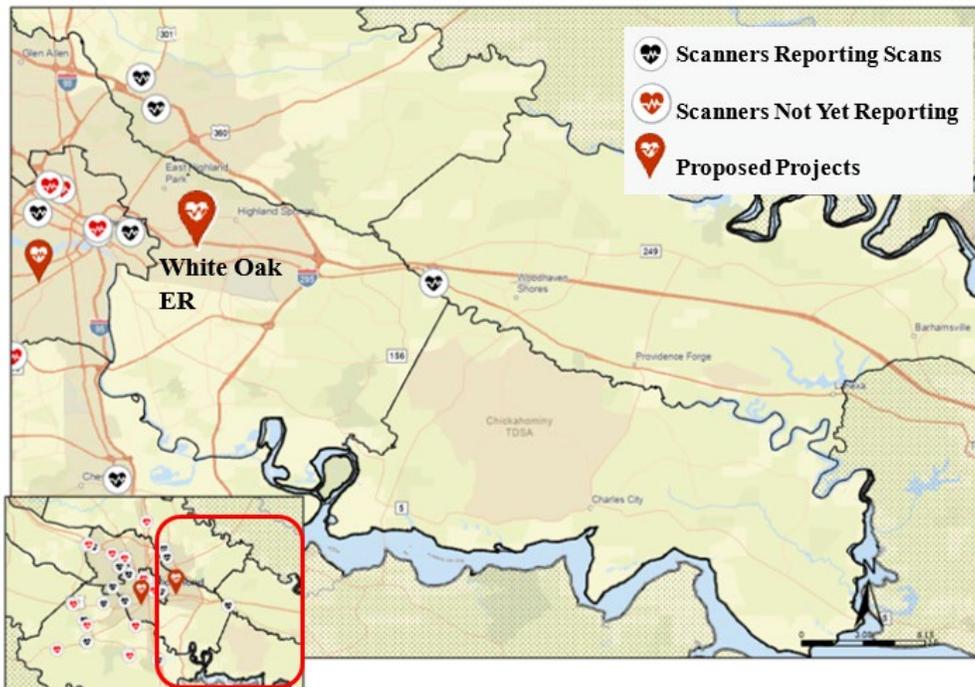
Location	Population in Poverty	Total Population	Poverty Percentage
Charles City County	746	6,544	11.4%
Chesterfield County	27,250	383,803	7.1%
Goochland County	1,897	27,493	6.9%
Hanover County	6,949	113,918	6.1%
Henrico County	34,434	334,311	10.3%
New Kent County	1,179	26,795	4.4%
Powhatan County	2,107	31,448	6.7%
City of Richmond	40,639	223,291	18.2%
PD 15	115,201	1,147,603	10.0%
Virginia	839,669	8,568,051	9.8%

Source: US Census SIAPE (2024)

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors' Hospital

The location of the White Oak ER is in Henrico County at the intersection of South Laburnum Ave, also known as Highway 197, and I-64. Within five minutes of the location, there is access to State Routes 60 and 33. White Oak ER's CT scanner will be the second furthest west in the PD, with ED- VCU at Pocahontas Trail being the only other in that area of the PD. The ED-VCU CT scanner operated at 86.5% utilization in 2024. The scanner is currently the only provider in New Kent County and the closest scanner in Charles City County within the PD. There are no authorized scanners within Charles City County (**Map 2**).

Map 2: Authorized CT Scanners Near White Oak ER



Source: ArcGIS, DCOPN Inventory, VHI Records

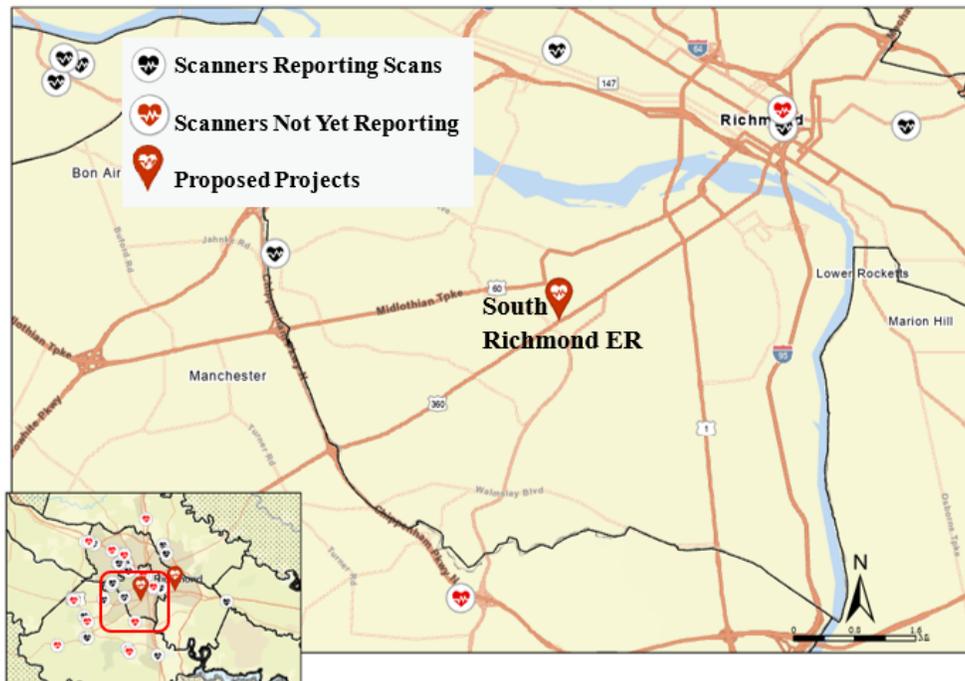
Henrico had a poverty percentage of 10.3% in 2024, the last year for which data is available (**Table 9**). This percentage is slightly higher than the poverty rate of PD 15 and that of Virginia, with a population that is 30% of the PD and approximately 4% of the state's population. As stated above, Henrico County has the second largest population in the PD and is expected to continue to grow to a total population of 356,565 in 2030 (**Table 1**). The estimated population in 2024 is less than the Weldon-Cooper 2030²⁰ estimate, indicating that the population is growing at a slightly slower growth rate than originally projected in 2020.

VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

²⁰ The 2020-2030 Weldon-Cooper population estimates, based on a linear growth rate over the 10 years, indicate population of 343,296 in Henrico County in 2024. The SAIFE 2024 data showed a population of around 334,311 people- a difference of 8,985 people.

Chippenham & Johnston-Willis’s South Richmond ER is located in a shopping center at the intersection of US-360 and State Route 161. Further north of State Route 161 is Highway 60. The location is approximately 0.6 miles north of the Hunter Holmes McGuire Veterans Affairs Medical Center²¹ (VA Medical Center). The location is south of the James River, and the closest unrestricted²² CT scanner is approximately five miles northwest of Chippenham Hospital’s main campus (Map 3).

Map 3: Authorized CT Scanners Near South Richmond ER



Source: ArcGIS, DCOPN Inventory, VHI Records

The City of Richmond has a poverty percentage of 18.2%, over double the rate of the state and slightly less than double the rate of the PD. The city’s total population makes up approximately 19.5% of the PD’s and 2.6% of Virginia’s population as well. As stated above, the City of Richmond has the third largest population in the PD and is expected to continue to grow to a total population of 245,437 in 2030 (Table 1). The estimated population in 2024 is less than the linear projection of the data based on the Weldon-Cooper 2030²³ estimate, with around 19,850 fewer people living in the city in 2024 than estimated. This indicates that the population is growing at a slower rate than originally projected in 2020.

2. The extent to which the project will meet the needs of the residents of the area to be served, as demonstrated by each of the following:

²¹Medical services provided by state or federal departments, such as the Veteran’s Affairs or Correctional Facilities, are not required to apply for COPN certificates or report data to VHI. DCOPN is unaware of the utilization of any CT scanners at the facility, or of how many residents are eligible to receive imaging services.

²² In this case, unrestricted also refers to eligible to all residents.

²³ The 2020-2030 Weldon-Cooper population estimates, based on a linear growth rate over the 10 years, indicate population of 243,141 in Henrico County in 2024. The SAIPE 2024 data showed a population of around 223,291 people- a difference of 19,850 people.

(i) The level of community support for the project demonstrated by citizens, businesses, and governmental leaders representing the area to be served.

Public Hearing

Section 32.1-102.6 B of the Code of Virginia directs DCOPN to hold one public hearing on each application in a location in the county or city in which the project is proposed or a contiguous county or city in the case of competing applications, or in response to a written request by an elected local government representative, a member of the General Assembly, the Commissioner, the applicant, or a member of the public. Public hearings were held for the two proposed projects under review on March 10, 2026, at the Twin Hickory Branch Library in Henrico, Virginia. In addition, DCOPN provided notice to the public on January 20, 2026, regarding these proposed projects, inviting public comment. The public comment period closed on March 16, 2026.

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors' Hospital

At the public hearing, six participants were in support, and none opposed the proposed project. The comments from the public hearing in aggregate expressed the following:

- There is an institutional need for an additional CT scanner, and a deficit in the PD.
- Having a scanner at the White Oak ER will allow patients to receive care closer to their homes and decrease the high demand at HDH Parham and HDH Forest.

There were three letters of commitment from community members included with the application. Writers include the Henrico Fire Chief, along with physicians providing existing services. The letters in aggregate expressed the following:

- The proposed facility is highly accessible along I-64, which will cut down on travel time in cases of emergency transport.
- Patients who currently receive care at Henrico Doctors' locations live near the area and can receive services with less travel time.
- The added CT can provide faster service on an outpatient basis.

On March 16, 2026, DCOPN received a letter from the Chief Operating Officer of the Bon Secours Richmond Health System opposing the project. The writer acknowledged that there is a deficit of CT scanners but stated that the location of the White Oak ER is in an area primarily receiving services from Bon Secours. The facility is one mile from a Bon Secours Urgent Care that opened "six weeks before HCA filed the White Oak ER application"²⁴. Bon Secours Richmond Community Hospital is also located near the proposed location, and the hospital completed a \$1.8 million "replacement CT imaging suite" with a 64-slice CT scanner which will be able to provide imaging services at a faster rate. Within the five zip codes closest to the proposed site, the combined Bon Secours facilities provided 59.2% of the market share in 2025, whereas HDH services were 10.5% and all HCA combined at 16.9%. Bon Secours stated a

²⁴ The Bon Secours Urgent Care that was opened does not have a CT scanner. As stated before, DCOPN does not regulate ERs, and cannot evaluate services provided at a freestanding facility outside of DCOPN regulated equipment or services.

concern that the facility will “divert critical emergency department volumes from [Richmond Community Hospital]- and... the downstream inpatient admissions that those ED visits generate”. The letter also commented that the proposed White Oak ER has a “nearly entirely overlapping” primary service area to the Scott’s Addition ER which has not yet started services.

Henrico Doctors’ responded to the letter of opposition on March 17, 2026, stating that the approval of the proposed project will not harm the Bon Secours Richmond Community Hospital due to the hospital performing above the SMFP utilization threshold and there being an existing patient base for HDH Forest. It was noted that the approval of the proposed project will increase patient choice and access to CT imaging services. The projection of CT scans for the White Oak ER was restated, with a focus on the current utilization of CT scanners and institutional need.

VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

At the public hearing, six participants were in support, and none opposed Chippenham & Johnston-Willis’s proposed project. The comments from the public hearing in aggregate expressed the following:

- There is an institutional need for an additional CT scanner, and a deficit in the PD.
- When time is of the essence, such as in cases of heart attacks or strokes, a facility closer will assist in the treatment and outcome. The South Richmond ER will be in an area where there are few options for care in the City of Richmond without crossing the James River which can be slow-moving during rush hour.
- The location of the South Richmond ER is “highly-accessible” and can save time with the transportation of patients via ambulance. The time saved allows other patients to receive care.

There were three letters of commitment from community members, and one letter on behalf of Chippenham Johnston-Willis’ physicians. The letters in aggregate expressed the following:

- CT scanners are an “indispensable tool in the diagnosis and treatment” of medical emergencies. The additional scanner will allow for the provision of faster services.
- Patients who currently receive care at Henrico Doctors’ locations live near the area and can receive services with less travel time.

(ii) The availability of reasonable alternatives to the proposed service or facility that would meet the needs of the population in a less costly, more efficient, or more effective manner.

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors’ Hospital

The location of the White Oak ER is also in the eastern portion of Henrico, where there is currently not a CT scanner. There is currently a geographic gap between ED- VCU at Pocahontas Trail and Bon Secours Richmond Community Hospital at 1500 N. 28th St. This distance is approximately 15 miles, or a 20-minute drive. East of the ED-VCU, there are no additional CT scanners in the PD.

An alternative to the proposed project is to establish the specialized imaging center for CT imaging services closer to the location of HDH Forest. The proposed location for COPN Request No. VA-8859 is in a zip code that is on the opposite side of Henrico from HDH Forest. Residents living in the zip code of the current proposed site primarily seek health care services at a Bon Secours hospital or VCU Medical Center. Based on the applicant’s stated intent to decant volumes from HDH Forest, a location closer to the hospital where more of HDH Forest’s patients reside would be more effective.

VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

There have been two facilities already authorized for the reduction of the overutilization of the Chippenham Hospital CT scans, which reported a utilization of 250.3% in 2024, the last year for which data is available. Iron Bridge ER was authorized for the establishment of a specialized imaging center with a CT scanner and was expected to start services on February 28, 2026. Swift Creek ER was authorized as well; however, the CT at Swift Creek was approved for relocation to Magnolia Hospital in March of 2026²⁵. As shown in **Table 6**, all associated facilities reported utilization of over 100% in 2024. If the volume of scans stays the same after the opening of the Iron Bridge ER, the average utilization of the Chippenham & Johnston-Willis CT scanners is approximately 170.4%. Due to the high utilization, DCOPN has not identified a reasonable alternative to the proposed project that will meet the needs of the population in a less costly, more efficient, or more effective manner.

Table 6: Utilization of Associated CT Scanners (as shown above)

Location	Fixed Scanner	2024 Scans	2024 Utilization
Chippenham Hospital	3	55,556	250.3%
Johnston-Willis Hospital	3	37,560	169.2%
ED- Swift Creek ER ²⁶	1	7,862	106.2%
ED- Iron Bridge ER	1	-	-
Reporting Total	7	100,878	194.7%
Authorized Total	8	100,878	170.4%

Source: VHI Data, DCOPN Inventory

(iii) Any recommendation or report of the regional health planning agency regarding an application for a certificate that is required to be submitted to the Commissioner pursuant to subsection B of § 32.1-102.6.

Currently there is no organization in HPR IV designated by the Virginia Department of Health to serve as the Health Planning Agency for PD 15. Therefore, this consideration does not apply to the review of the proposed project.

(iv) Any costs and benefits of the project.

²⁵ COPN VA-04982

²⁶ The scanner at this location will be relocated to Magnolia Hospital.

The cost of both proposals is comparable to other recent projects for the establishment of imaging centers with CT scanners. A certificate awarded in February 2026 for the establishment of a center for CT services with one scanner was estimated to cost \$243,830²⁷; a similar certificate in August 2025 was awarded to a project with a cost estimation of \$1,002,090²⁸.

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors' Hospital

Henrico Doctors' is expecting to spend \$1,212,973 on the establishment of the imaging center with one fixed CT scanner. As stated above, miscellaneous costs, referenced in **Table 7**, include the lease of the site pro rata, site preparation, testing, and building fees as described in the application. The proposed project will be funded through accumulated reserves of Henrico Doctors' Hospital; it is not expected to impact care already being provided.

Table 7: Total Capital Costs *(as shown above)*

Direct Construction	\$ 347,000
Equipment Not Included	\$ 560,000
Misc. Costs	\$ 281,973
Architect and Engineering Fees	\$ 24,000
Sub-Total	\$ 1,212,973

Source: COPN Request No. VA-8859

A benefit of the proposed project includes the addition of a CT scanner closer to New Kent County and Charles City County, where there is currently only one scanner providing services. The proposed project will also reduce the deficit of CT scanners in the PD and address institutional need²⁹, as shown in the appropriate sections below.

VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

Chippenham & Johnston-Willis is expecting to spend \$1,001,174 on the establishment of the imaging center with one CT scanner. The cost of the proposed project will be paid through the internal reserves of HCA Healthcare, the parent company of Chippenham & Johnston-Willis, and is not expected to impact on care already being provided at other locations. Miscellaneous costs, referenced in **Table 8**, include the lease of the site pro rata, site preparation, testing, and building fees as described in the application.

While the City of Richmond has several CT scanners north of the James River, the southeastern portion of the city only has Chippenham. The proposed project will add a scanner in the area for patients needing care. The proposed project will also reduce the deficit of CT scanners in the PD and address the institutional need for existing CT scanners, as shown in the appropriate sections below.

²⁷ COPN VA-04979

²⁸ COPN VA-04955

Table 8: Total Capital Costs *(as shown above)*

Direct Construction	\$ 282,000
Equipment Not Included	\$ 560,000
Miscellaneous Costs	\$ 140,174
Architect and Engineering Fees	\$ 19,000
Total	\$ 1,001,174

Source: COPN Request No. VA-8860

(v) The financial accessibility of the project to the residents of the area to be served, including indigent residents.

Section 32.1-102.4. B of the Code of Virginia indicates that, should the proposed project receive approval, the proposed project would be conditioned to provide a level of charity care. Pursuant to the Code of Virginia, any COPN issued for this project will also be conditioned on the applicant's agreement to accept patients who are the recipients of Medicare and Medicaid.

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors' Hospital

Henrico Doctors' proffered a charity care of 0.9% in the application. This is consistent with the HPR average and will be applied to the certificate should the application be approved. In 2024, HCA Healthcare reported a charity care provision of approximately 0.8% of the gross patient revenue.

VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

Chippenham & Johnston-Willis proffered a 1.0% charity care in the application. This is 0.1% above the HPR average and will be applied to the certificate should the application be approved. In 2024, Chippenham & Johnston-Willis reported a charity care provision of approximately 1.0% of the gross patient revenue.

Table 10: 2024 Charity Care Contributions at or below 200% of Federal Poverty Level

HPR IV	Gross Patient Revenue	Charity Care	% of Gross Patient Revenue
Inpatient Hospitals			
Encompass Health Rehab Hosp of Petersburg	\$ 35,558,767	\$ 1,308,642	3.7%
Sentara Halifax Regional Hospital	\$ 327,271,181	\$ 7,067,762	2.2%
Bon Secours Southern Virginia Regional Medical Center	\$ 269,252,865	\$ 5,288,471	2.0%
Bon Secours St. Francis Medical Center	\$ 1,701,025,863	\$ 31,217,891	1.8%
Sheltering Arms Institute	\$ 192,018,830	\$ 3,216,579	1.7%
Bon Secours Richmond Community Hospital	\$ 1,365,231,628	\$ 18,873,667	1.4%
Bon Secours St. Mary's Hospital	\$ 3,029,648,941	\$ 39,467,281	1.3%
CJW Medical Center HCA	\$ 11,840,238,948	\$ 123,924,990	1.0%
Bon Secours Southside Regional Medical Center	\$ 2,820,829,311	\$ 28,237,470	1.0%
TriCities Hospital HCA	\$ 1,474,696,049	\$ 14,176,839	1.0%
Henrico Doctors' Hospital HCA	\$ 7,780,639,272	\$ 59,835,274	0.8%
VCU Health System	\$ 9,030,145,019	\$ 63,013,672	0.7%
Poplar Springs Hospital UHS	\$ 88,666,484	\$ 493,078	0.6%
Bon Secours Memorial Regional Medical Center	\$ 2,044,616,572	\$ 9,753,595	0.5%
Centra Southside Community Hospital	\$ 415,397,324	\$ 1,821,204	0.4%
VCU Community Memorial Hospital	\$ 448,298,275	\$ 1,239,044	0.3%
Encompass Health Rehab Hosp of Virginia	\$ 32,375,170	\$ 2,350	0.0%
Select Specialty Hospital - Richmond	\$ 192,901,481	\$ -	0.0%
Cumberland Hospital for Children and Adolescents UHS	\$ 29,398,596	\$ -	0.0%
Total Inpatient Hospitals:			19
HPR IV Total Inpatient \$ & Mean %	\$ 43,118,210,576	\$ 408,937,809	0.9%

HPR IV	Gross Patient Revenue	Charity Care	% of Gross Patient Revenue
Outpatient Centers			
American Access Care of Richmond	\$ 6,271,285	\$ 83,974	1.3%
Boulders Ambulatory Surgery Center HCA	\$ 206,880,229	\$ 2,653,240	1.3%
VCU Health Neuroscience, Orthopedic and Wellness Center	\$ 78,434,508	\$ 608,160	0.8%
Virginia Eye Institute, Inc.	\$ 64,339,818	\$ 455,572	0.7%
St. Mary's Ambulatory Surgery Center	\$ 62,609,653	\$ 305,241	0.5%
MEDRVA Stony Point Surgery Center	\$ 59,309,363	\$ -	0.0%
Urosurgical Center of Richmond	\$ 47,080,875	\$ -	0.0%
MEDRVA Surgery Center @ West Creek	\$ 13,820,435	\$ -	0.0%
Cataract and Refractive Surgery Center	\$ 9,845,331	\$ -	0.0%
Skin Surgery Center of Virginia	\$ 1,708,546	\$ -	0.0%
Virginia ENT Surgery Center	Not Reported	\$ -	
Virginia Beach Health Center VLPP	Not Reported	\$ -	
Total Outpatient Hospitals:			10
HPR IV Total Outpatient Hospital \$ & Mean %	\$ 550,300,043	\$ 4,106,187	0.7%
Total Hospitals:			29
HPR IV Total \$ & Mean %	\$ 43,668,510,619	\$ 413,043,996	0.9%

Source: VHI Data (2024)

- (iv) At the discretion of the Commissioner, any other factors as may be relevant to the determination of public need for a project.**

There are no other factors, not addressed elsewhere in the analysis, relevant to the determination of a public need for either proposed project.

3. The extent to which the application is consistent with the State Medical Facilities Plan.

Section 32.1-102.2:1 of the Code of Virginia calls for the State Health Services Plan Task Force to develop recommendations for a comprehensive State Health Services Plan (SHSP). In the interim, DCOPN will consider the consistency of the proposed project with the predecessor of the SHSP, the State Medical Facilities Plan (SMFP).

The SMFP contains the criteria and standards for CT imaging services. They are as follows:

**Part I
Definitions and General Information**

12VAC5-230-60. When competing applications received.

In reviewing competing applications, preference may be given to an applicant who:

- 1. Has an established performance record in completing projects on time and within the authorized operating expenses and capital costs;**
- 2. Has both lower capital costs and operating expenses than his competitors and can demonstrate that his estimates are credible;**
- 3. Can demonstrate a consistent compliance with state licensure and federal certification regulations and a consistent history of few documented complaints, where applicable; or**
- 4. Can demonstrate a commitment to serving his community or service area as evidenced by unreimbursed services to the indigent and providing needed but unprofitable services, taking into account the demands of the particular service area.**

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors' Hospital

- 1. The applicant has shown a history of completing projects within the year of the original completion date proposed. Some projects have been authorized for which DCOPN has not received indefinite extensions, most of which are concerning medical/surgical beds³⁰, however, and not related to CT scanners. All CT scanners for the applicant have been implemented within eight months of the original date.**

³⁰ COPN VA-04638, COPN VA-04702, and COPN VA-04712 are authorizing beds at Henrico Doctors' Hospitals in 2020 and have not filed Indefinite Extensions with DCOPN as of the publishing of this report.

2. Henrico Doctors' estimates that the proposed project will cost \$1,001,174. This is slightly less than the Chippenham & Johnston-Willis' proposed project. DCOPN does not have any information stating that the estimates are not credible.
3. The hospital system has had reports of non-compliance regarding different services; however, none were associated with outpatient facilities.
4. Henrico Doctors' has a history of meeting charity care conditions outlined on certificates, to the best of DCOPN's knowledge. In 2024, the applicant reported a charity care of 0.9% of the gross patient average, which is the HPR average.

VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

1. The applicant has completed a majority of authorized projects within a year of the originally estimated completion date within an average of 109% of the authorized budget. However, there have been projects that have required significant changes regarding time and budget. Most notably for CT scanners, the Magnolia ER³¹ was expected to be complete in May 2026; however, there was no progress documentation provided to DCOPN about the project until it was discontinued in March 2026 after the authorization of the Magnolia Hospital.
2. Chippenham & Johnston-Willis estimate that the proposed project will cost \$1,056,000. This is slightly more than the Henrico Doctors' estimate. DCOPN does not have any information stating that the estimates are not credible.
3. The hospital system has had reports of non-compliance regarding different services, however, none were associated with outpatient facilities.
4. Chippenham & Johnston-Willis has a history of meeting charity care conditions outlined on certificates, to the best of DCOPN's knowledge. In 2024, the applicant reported a charity care of 1.0% of the gross patient average, slightly higher than the HPR average of 0.9%.

12VAC5-230-80. When institutional expansion needed.

- A. Notwithstanding any other provisions of this chapter, the commissioner may grant approval for the expansion of services at an existing medical care facility in a health planning district with an excess supply of such services when the proposed expansion can be justified on the basis of a facility's need having exceeded its current service capacity to provide such service or on the geographic remoteness of the facility.**
- B. If a facility with an institutional need to expand is part of a health system, the underutilized services at other facilities within the health system should be reallocated, when appropriate, to the facility with the institutional need to expand before additional services are approved for the applicant. However, underutilized**

³¹ COPN VA-04862

services located at a health system's geographically remote facility may be disregarded when determining institutional need for the proposed project.

- C. This section is not applicable to nursing facilities pursuant to § 32.1-102.3:2 of the Code of Virginia.
- D. Applicants shall not use this section to justify a need to establish new services.

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors' Hospital

- A. HDH Forest reported a CT utilization of 259.4% in 2024. The Henrico Doctors' facilities altogether operated at an average utilization of 117.1% in the same year.
- B. Also shown in **Table 5**, there are two Henrico Doctors' affiliated facilities with scanners operating with 56% (HDH Retreat) and 57% (Ed- Hanover Emergency Center). The facilities; however, have one scanner each and removing the scanner would leave the facility unable to provide CT imaging services.
- C. The applicant is not a nursing facility applying for services.
- D. The proposed project is not a new service, but the expansion of the current service as CT imaging is already provided at the applying location. The location of the proposed CT scanner will not be on the campus of HDH Forest, but rather in a freestanding ED a little over 14 miles away³². The location is within the primary service area of HDH Forest; however, patients from the 23231-zip code are responsible for only 1.56% of the total HDH Forest patient population (**Figure 1**). The primary facility where people residing in the 23231-zip code receive care is Bon Secours Memorial Regional. The proposed project is likely to decrease the utilization of existing providers and not, as the applicant proposed, decant the high utilization at HDH Forest.

³² Microsoft Streets and Map (2008)

Figure 1: HDH Forest Primary Service Area and 23231 Resident Preferred Healthcare Facilities

HDH Forest Primary Service Area				Locations of Care Received by 23231 Zip Code		
Zip code	Total Cases	Patient Percentage	Cumulative Percentage	Medical Facilities	Total Cases	Location Percentage
23228	779	8.41%	8.41%	Bon Secours Memorial Regional	711	36%
23229	739	7.97%	16.38%	VCU Medical	624	32%
23060	707	7.63%	24.01%	Bon Secours St. Mary's Hospital	265	13%
23238	626	6.76%	30.77%	Henrico Doctors' Hospital	145	7%
23233	543	5.86%	36.62%	Chippenham Hospital	110	6%
23059	434	4.68%	41.31%	Bon Secours Richmond Community	46	2%
23227	381	4.11%	45.42%	Encompass Health	38	2%
23294	352	3.80%	49.22%	Sheltering Arms	38	2%
23005	233	2.51%	51.73%			
23226	218	2.35%	54.08%			
23111	209	2.26%	56.34%			
23222	203	2.19%	58.53%			
23116	199	2.15%	60.68%			
23192	194	2.09%	62.77%			
23024	180	1.94%	64.71%			
23223	167	1.80%	66.52%			
23225	153	1.65%	68.17%			
23220	153	1.65%	69.82%			
23231	145	1.56%	71.38%			
23103	135	1.46%	72.84%			
23063	134	1.45%	74.29%			
23117	118	1.27%	75.56%			

Source: Data.CMS.gov (2024)

VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

- A. Chippenham Hospital, Johnston-Willis Hospital, and the associated Swift Creek ER are all performing volumes that in culmination created a utilization rate average of 194.7% in 2024. Each hospital’s utilization was higher than 100% individually. As Chippenham Hospital will be the sole owner of the proposed site, the institutional need is determined by its utilization alone. The hospital had a utilization of 250.3% in 2024, indicating an institutional need.
- B. There are no locations affiliated with Chippenham & Johnston-Willis directly that are performing under 100% utilization (**Table 6**). No scanner can be relocated without significantly negatively impacting the existing imaging service being provided.
- C. The applicant is not a nursing facility applying for services.
- D. This is not a new service, but the expansion of the current CT imaging services already provided by the applicant. The location of the proposed CT scanner will not be on the campus of either over-utilized hospital, but rather in a freestanding ED a little under 4

miles away³³. Chippenham Hospital is the primary source of health care services by residents in the 23224-zip code where the South Richmond ER will be located (Figure 2).

Figure 2: Chippenham Hospital Primary Service Area and 23224 Resident Preferred Healthcare Facilities

Chippenham Hospital Primary Service Area				Locations of Care Received by 23224 Zip Code		
Zip code	Total Cases	Patient Percentage	Cumulative Percentage	Medical Facilities	Total Cases	Location Percentage
23225	1240	7.76%	7.76%	Chippenham Hospital	889	53.49%
23234	1231	7.70%	15.47%	VCU Medical	408	24.55%
23235	1197	7.49%	22.96%	Bon Secours St. Mary's	144	8.66%
23832	1001	6.27%	29.22%	Henrico Doctors' Hospital	93	5.60%
23236	909	5.69%	34.91%	Bon Secours St. Francis	37	2.23%
23224	889	5.56%	40.48%	Bon Secours Regional Medical Center	33	1.99%
23112	830	5.19%	45.67%	Bon Secours Community Hospital	21	1.26%
23113	715	4.48%	50.15%	Sheltering Arms	19	1.14%
23831	703	4.40%	54.55%	Rehabilitation Hospital of Virginia	18	1.08%
23237	644	4.03%	58.58%			
23139	515	3.22%	61.80%			
23860	469	2.94%	64.74%			
23114	414	2.59%	67.33%			
23838	397	2.48%	69.81%			
23803	396	2.48%	72.29%			
23002	371	2.32%	74.61%			
23834	348	2.18%	76.79%			

Source: Data.CMS.gov (2024)

Article 1

Criteria and Standards for Computed Tomography

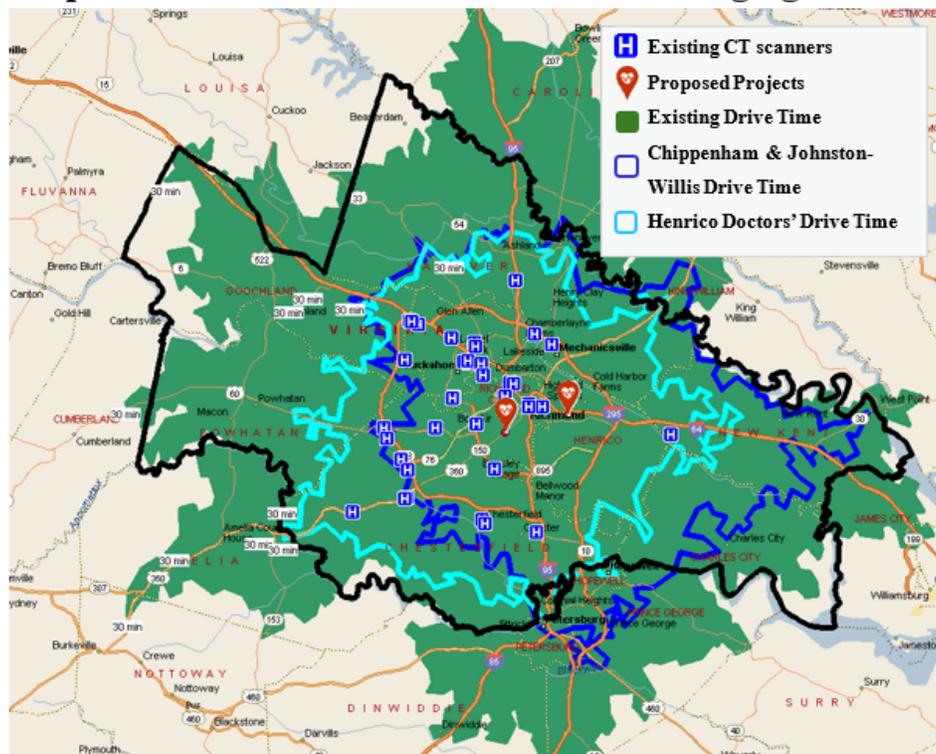
12VAC5-230-90. Travel time.

CT 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.

³³ Microsoft Streets and Map (2008)

Map 4 shows the travel time from locations of authorized CT scanners in the PD, highlighted by the dark green background. The dark blue outline is the drive-time radius from the project proposed by Chippenham & Johnston-Willis. The neon blue outline is the 30-minute radius from the proposed Henrico Doctors' location. The facilities proposed are highlighted with the red symbols. Most of the PD is included in a 30-minute radius of existing facilities, except for the north-west portion of Hanover County and Goochland County. When the map is compared with the population of the PD by census tract in 2020, the last year the data is available, the population in areas covered by the drive time still equate to approximately 95% of the PD's population. This meets the requirement of the SMFP criterion outlined.

Map 4: 30-Minute Travel Time from CT Imaging Providers



Source: Microsoft Streets & Trips (2008), DCOPN Inventory

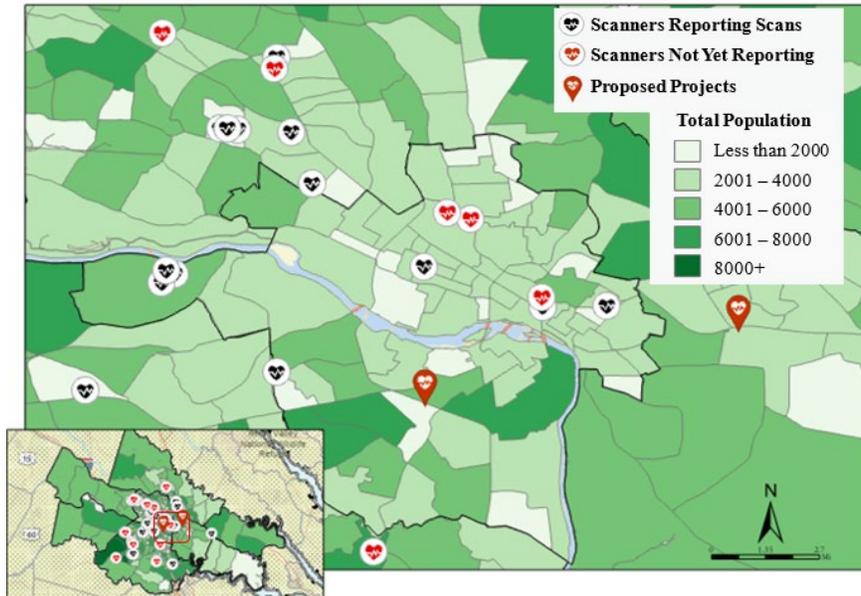
VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors' Hospital

Henrico Doctors' will not add to the geographic accessibility of the PD as defined through the 30-minute drive. The access to the facility will overlap with existing providers.

VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

Chippenham & Johnston-Willis will not add to the geographic accessibility of the PD as defined by the 30-minute drive. The access to the facility will overlap with existing providers.

Map 5: 2020 Population of Census Tracts (PD 15)



Source: ArcGIS, DCOPN Inventory, VHI Records

12VAC5-230-100. Need for new fixed site or mobile service.

- A. No new fixed site or mobile CT service should be approved unless fixed site CT services in the health planning district performed an average of 7,400 procedures per existing and approved CT scanner during the relevant reporting period and the proposed new service would not significantly reduce the utilization of existing 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 CT scanners in such health planning district.**
- B. Existing CT scanners used solely for simulation with radiation therapy treatment shall be exempt from the utilization criteria of this article when applying for a COPN. In addition, existing CT scanners used solely for simulation with radiation therapy treatment may be disregarded in computing the average utilization of CT scanners in such health planning district.**

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors' Hospital and VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

This criterion does not apply to either applicant. Neither proposed project is applying for new services, rather for the expansion of the existing CT imaging services.

12VAC5-230-110. Expansion of fixed site service.

Proposals to expand an existing medical care facility's CT service through the addition of a CT scanner should be approved when the existing services performed an average of 7,400 procedures per scanner for the relevant reporting period. The commissioner may authorize placement of a new unit at the applicant's existing medical care facility or at a separate location within the applicant's primary service area for CT services, provided the proposed expansion is not likely to significantly reduce the utilization of existing providers in the health planning district.

Table 11: Average CT Procedures Performed and Utilization in 2024 (PD 15)

Facility Name	Total Units	Total CT Procedures	Average Procedures Per Scanner	Utilization
Facilities Connected to Henrico Doctors'				
Henrico Doctors' Hospital - Forest	2	38,395	19,198	259.4%
Henrico Doctors' Hospital - Parham Doctors' Hospital	1	13,913	13,913	188.0%
Henrico Doctors' Hospital - Retreat	1	4,145	4,145	56.0%
ED - Hanover Emergency Center	1	4,217	4,217	57.0%
<i>Subtotal</i>	5	60,670	12,134	164.0%
Facilities Connected to Chippenham & Johnston-Willis				
Chippenham Hospital	3	55,556	18,519	250.3%
Johnston-Willis Hospital	3	37,560	12,520	169.2%
ED - Swift Creek ER	1	7,862	7,862	106.2%
<i>Subtotal</i>	7	100,978	14,425	194.9%
Other PD 15 Reporting Facilities				
Bon Secours Imaging Center at Reynolds Crossing	1	3,507	3,507	47.40%
Bon Secours Memorial Regional Medical Center	3	46,765	15,588	210.70%
Bon Secours Richmond Community Hospital	1	7,655	7,655	103.40%
Bon Secours St. Francis Medical Center	2	33,824	16,912	228.50%
Bon Secours St. Mary's Hospital	3	43,892	14,631	197.70%
Bon Secours Westchester Imaging Center	1	3,983	3,983	53.80%
Chesterfield Imaging	1	6,599	6,599	89.20%
ED - Bon Secours Chester Emergency Center	1	9,478	9,478	128.10%
ED - Bon Secours Short Pump	1	12,299	12,299	166.20%
ED - Bon Secours Westchester	1	5,539	5,539	74.90%
ED- VCU at Pocahontas Trail	1	6,403	6,403	86.50%
Independence Park Imaging	1	4,901	4,901	66.20%
MedRVA Imaging Center	1	958	958	12.90%
NOW Neuroscience, Orthopedic and Wellness Center	1	5,789	5,789	78.20%
Richmond Ear Nose and Throat	1	302	302	4.10%
Urosurgical Center of Richmond	2	8,885	4,443	60.00%
VCU Medical Center	9	84,972	9,441	127.60%
VCU Medical Center at Stony Point Radiology	1	7,001	7,001	94.60%
Virginia Cancer Institute - Discovery Drive	1	5,647	5,647	76.30%
Virginia Cancer Institute - Harbourside	1	5,052	5,052	68.30%
Virginia Cardiovascular Specialists, PC	1	5,092	5,092	68.80%
PD15 Total	47	470,191	10,004	135.20%

Source: VHI Data

Table 11 shows the utilization of the CT scans in PD 15 in 2024, the last year for which data is available. The average utilization of the 47 reporting PD's CT scanners' was approximately 135.2%, with the average procedure per scanner yielding a volume of 10,004 procedures. **Table 11** has the utilization of facilities connected to each applicant sectioned off with the procedure average documented as well.

To calculate the number of CT scanners needed in PD 15, the 2024 volume was divided by the SMFP-defined threshold of 7,400. There is a demand for 63.54, or 64, scanners. Sixty-one scanners have been authorized in the PD, meaning there is a deficit of approximately three scanners.

$$\frac{\text{2024 Volume}}{\text{SMFP Threshold}} = \frac{470,191}{7,400} = \mathbf{63.54 \text{ scanners}}$$

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors' Hospital

Henrico Doctors' reported an average volume of 12,134 procedures per scanner in 2024, for an average utilization of 164% of the SMFP threshold. As stated previously, the proposed facility is within the primary service area of HDH Forest showing an institutional need for expansion. There were 145 cases originating from the 23231-zip code at HDH Forest in 2024. The proposed location is technically within the primary service area of HDH Forest; however, the patients in the zip code encompass approximately 1.25% of the patient population of the hospital. The primary locations where residents of the 23231 zip code receive care is Bon Secours Memorial Regional, VCU Medical, and Bon Secours St. Mary's Hospital (**Figure 1**). Approval of the proposed project may significantly impact the CT imaging volume of existing providers.

VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

Chippenham & Johnston-Willis reported an average volume of 14,425 procedures per CT scanner in 2024, for a utilization of 194.9%. The proposed facility is located within the service area of Chippenham Hospital which showing an institutional need for expansion. Chippenham Hospital is the primary provider of healthcare services in the zip code where the proposed project will be located.

12VAC5-230-120. Adding or expanding mobile CT services.

- A. Proposals for mobile CT scanners shall demonstrate that, for the relevant reporting period, at least 4,800 procedures were performed and that the proposed mobile unit will not significantly reduce the utilization of existing CT providers in the health planning district.**
- B. Proposals to convert authorized mobile CT scanners to fixed site scanners shall demonstrate that, for the relevant reporting period, at least 6,000 procedures were performed by the mobile scanner and that the proposed conversion will not**

significantly reduce the utilization of existing CT providers in the health planning district.

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors' Hospital and VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

This criterion does not apply to either applicant. Neither applicant is applying for mobile CT services, mobile or fixed.

12VAC5-230-130. Staffing.

CT services should be under the direction or supervision of one or more qualified physicians.

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors' Hospital

Henrico Doctors' states that services will be provided under the direction or supervision of a qualified physician.

VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

Chippenham & Johnston-Willis states that services will be provided under the direction or supervision of a qualified physician.

Required Considerations Continued

- 4. The extent to which the proposed service or facility fosters institutional competition that benefits the area to be served while improving access to essential health care services for all persons in the area to be served.**

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors' Hospital

Henrico Doctors' proposed facility is located near Bon Secours Community Hospital (2.7 miles) and VCU's main campus (approximately 4 miles). The proposal is for an outpatient facility which will increase accessibility at reduced cost. While approval of the project would increase options for CT imaging services and reduce the deficit of CT scanners in the PD, the location of the proposed facility is in an area where residents primarily receive care from alternate providers. HDH Retreat is the closest Henrico Doctors' location to the proposed facility, and is operating with a utilization of 56.0% of the SMFP threshold for expansion.

VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

The location of the South Richmond ER is approximately 3.6 miles south of the VCU campus and 4.2 miles south of the Bon Secours Richmond Community Hospital. The addition of the CT

scanner would increase the options for CT imaging services and reduce the deficit of CT scanners, as well as reduce the institutional need of Chippenham Hospital. The location will also be an outpatient facility which will increase accessibility at reduced cost.

5. The relationship of the project to the existing health care system of the area to be served, including the utilization and efficiency of existing services or facilities.

There are currently 61 authorized CT scanners in the PD, with 47 reporting utilization in 2024. The utilization of the reporting scanners was 135.2% in that same year. If the volume remains the same after all projects are completed, the utilization will be 104.2%. There is also a deficit of 3 scanners in the PD.

Table 12: Reported Data from Existing Facilities Near Projects (2024)

	Total Scanners	Total CT Procedures	Utilization
Bon Secours Richmond Community Hospital	1	7,655	103.4%
ED- VCU at Pocahontas Trail	1	6,403	86.5%
VCU Medical Center	9	84,972	127.6%
Chippenham Hospital	3	55,556	250.3%
PD15 Total	14	154,586	135.2%

Source: VHI Data

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors’ Hospital

Among the HCA Doctors’ facilities, there is an overall average CT utilization rate of 164%. While there have been two additional CT scanners that have not yet started services, the utilization is at an institutional need.

As stated above, the locations nearest to the proposed location are Bon Secours Richmond Community Hospital, the VCU main campus, and ED- VCU at Pocahontas Trail. **Table 12** shows the procedure volumes and CT utilization rates at each facility. The scanner at the VCU Pocahontas Trail location has the lowest utilization at 86.5%. Despite the high utilization of existing providers near the proposed White Oak ER location, there is concern that the establishment of the ER will impact said providers. The distance between HDH Forest and the proposed White Oak ER covers all hospitals in Richmond, and most of the outpatient CT imaging providers in the PD, north of the James River. Should the proposed project be approved and a patient needs to be transferred, the patient would be taken to the other side of the county for emergency medical services. Although HDH Retreat is geographically closer, the institutional need and transfer agreement pertains to the hospital license under which the ER operates, which, unless otherwise specified, is HDH Forest. HDH Retreat is also operating with a utilization of 56.0% of the SMFP threshold for expansion, indicating that residents of the area are not going to the HDH Doctors’ location currently in operation.

VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

Chippenham & Johnston-Willis’s associated facilities in Richmond have a CT utilization of 194.9%, with one additional scanner authorized at Iron Bridge ER not yet reporting data. Every reporting facility operates above 100%, with the lowest utilization at Swift Creek ER which operates at a volume of 7,862 scans (106.2%).

The facilities closest to the proposed South Richmond ER location are Bon Secours Richmond Community Hospital, VCU Medical Center, and Chippenham Hospital. Each location is operating above 100% CT utilization, with the lowest reported utilization at 103.4% at Bon Secours Richmond Community Hospital (**Table 12**). The addition of another CT scanner is not projected to significantly impact existing CT imaging providers based on the existing utilization data.

6. The feasibility of the project, including the financial benefits of the project to the applicant, the cost of construction, the availability of financial and human resources, and the cost of capital.

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors’ Hospital

The proposed project’s expected cost of \$1,212,973 includes all fees for the leasing and preparation of the site as well as equipment needed. The proposed project is estimated to have a net income of \$658,842 in the first year of operation and \$764,971 in the second year (**Table 14**). The revenue is feasible and indicates a long-term viability should it occur as projected. The proposed project will require the addition of 4.7 full-time equivalent staff, with 4.2 radiologic technologists and 0.5 administrative support positions. The applicant states that recruitment will occur with partnering schools and residency programs.

Table 14: Projected Pro Forma

	Year 1	Year 2
Gross Revenue	\$ 40,362,702	\$ 43,965,851
Charity	\$ (363,264)	\$ (395,693)
Other Deductions	\$ (38,216,970)	\$ (41,628,571)
Net Revenue	\$ 1,782,468	\$ 1,941,587
Operating Expense	\$ (1,123,626)	\$ (1,176,616)
Net Income	\$ 658,842	\$ 764,971

Source: COPN Request No. VA-8859

VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

As stated above, the expected cost of the proposed project is \$1,001,174. This includes all fees for the leasing and preparation of the site as well as equipment needed.

Table 13: Projected Pro Forma

	Year 1	Year 2
Gross Revenue	\$ 52,555,706	\$ 70,131,502
Charity	\$ (473,001)	\$ (631,184)
Other Deductions	\$ (49,854,343)	\$ (66,526,743)
Net Revenue	\$ 2,228,362	\$ 2,973,576
Operating Expense	\$ (1,333,458)	\$ (1,630,390)
Net Income	\$ 894,904	\$ 1,343,186

Source: COPN Request No. VA-8860

The proposed project is estimated to have a net income of \$894,904 in the first year of operation and \$1,343,196 in the second year (**Table 14**). The revenue is feasible and indicates a long-term viability should it occur as projected. The proposed project will require the addition of 4.7 full-time equivalent staff, with 4.2 radiologic technologists and 0.5 administrative support positions. The applicant states that recruitment will occur with partnering schools and residency programs.

- 7. The extent to which the project provides improvements or innovations in the financing and delivery of health services, as demonstrated by: (i) The introduction of new technology that promotes quality, cost effectiveness, or both in the delivery of health care services. (ii) The potential for provision of services on an outpatient basis. (iii) Any cooperative efforts to meet regional health care needs. (iv) At the discretion of the Commissioner, any other factors as may be appropriate.**

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors’ Hospital

(i) The proposed project does not introduce new technology. (ii) The proposed project will provide CT imaging services on an outpatient basis. (iii) The facility will have a transfer agreement with HDH Forest. (iv) The location of the proposed project is on the opposite side of Henrico from HDH Forest where it is licensed. The proposed location is technically within the primary service area of HDH Forest; however, the patients in the zip code encompass approximately 1.25% of the patient population of the hospital. HDH Retreat is the closest Henrico Doctors’ location to the proposed facility and is operating with a utilization of 56.0% of the SMFP threshold for expansion. Approval of the project would decrease the utilization of HDH Retreat for residents interested in receiving care at an HDH Doctors’ facility while also impacting the utilization of other existing providers in the area.

VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

(i) The proposed project does not introduce new technology. (ii) The proposed project will provide CT imaging services on an outpatient basis. (iii) The facility will have a transfer agreement with Chippenham Hospital as the facility will be a satellite of the hospital. (iv) There are no other factors for the Commissioner to consider.

8. In the case of a project proposed by or affecting a teaching hospital associated with a public institution of higher education or a medical school in the area to be served.

(i) The unique research, training, and clinical mission of the teaching hospital or medical school. (ii) Any contribution the teaching hospital or medical school may provide in the delivery, innovation, and improvement of health care for citizens of the Commonwealth, including indigent or underserved populations.

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors' Hospital and VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

This is not applicable. The applicant is not a teaching hospital associated with a public institution of higher education or a medical school in the area to be served. The facilities do partner with colleges and universities.

DCOPN Staff Findings and Conclusions

There are currently 61 authorized CT scanners in PD 15, with 46 reporting CT imaging volumes in 2024, which was the last year for which data is available. The utilization of the reported volumes is approximately 135.2% of the SMFP threshold for expansion, and there is a deficit of 3 scanners for the district. A public hearing was held on March 10, 2026, for the proposed projects at the Twin Hickory Branch Library in Henrico and letters were sent to DCOPN during the public comment period.

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors' Hospital

HCA Health Services of Virginia, Inc. ("HCA Virginia") is a Virginia health system and a parent company of Henrico Doctors' Hospital ("Henrico Doctors"). Henrico Doctors' will be the sole owner of the proposed White Oak ER, and it will operate under the HDH Forest license. The facility will be located at 4415 S. Laburnum in Henrico County, Virginia. Henrico Doctors' is applying for the establishment of the White Oak ER as a specialized imaging center with one CT scanner.

The estimated cost for the project is \$1,212,973 which will be paid through accumulated reserves of HCA Virginia, and it's projected costs are comparable to other recent projects. Should the project be approved, the charity conditions associated will be 0.9%, which is consistent with the HPR IV average. There is a deficit of three scanners in the PD, and, due to the high utilization of HDH Forest (259.4% in 2024), there is institutional need. The location is within the primary service area. However, the proposed location in the 23231-zip code, accounts for only 1.56% of patients currently receiving CT services at HDH Forest, and the primary locations where residents of the zip code receive care are Bon Secours Memorial Regional (36%) and VCU Medical (32%). HDH Retreat is the closest Henrico Doctors' location to the proposed facility and is operating with a utilization of 56.0% of the SMFP threshold for expansion. This indicates that the residents of the area are not receiving care at the existing Henrico Doctors' location at a rate at which an additional CT scanner in the area is necessary. DCOPN concludes that the proposed location of the facility is likely to negatively impact other providers. DCOPN received a letter of opposition from the main health provider in the area, Bon Secours.

The proposed location of the White Oak ER will be the farthest west in Henrico, with only one other CT provider in the western portion of the PD. Approval of the project will not add geographic access to the PD within the 30-minute drive time outlined in the SMFP, but there is a deficit of 3 scanners. The project is feasible, with an estimated income of \$658,842 in the first year and \$764,971 in the second. It will require the addition of 4.7 full-time equivalent staff that will be recruited through partnerships with residency programs and schools. An alternative to the proposed project is to establish a specialized imaging center for CT imaging services in a location where HDH Forest has a robust patient base.

VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

HCA Healthcare, Inc. (“HCA”) is a Virginia health system and a parent company of Chippenham & Johnston-Willis Hospitals, Inc (“Chippenham & Johnston-Willis”). Chippenham & Johnston-Willis is applying for the establishment of the South Richmond ER as a specialized imaging center with one CT scanner, which will be located at 3830 Hull Street Road in Richmond. Among facilities associated with Chippenham & Johnston-Willis, the CT utilization is 194.7% of the SMFP threshold to expand, with 7 reporting scanners. One additional CT scanner at a freestanding facility is authorized but is not yet operational, bringing the average utilization to 170.4% of the SMFP threshold.

The estimated cost of the project is \$1,001,174, which will be paid through accumulated reserves. Should the proposed project be approved, the charity conditions associated will be 1.0%, which is consistent with the HPR IV average. There is no history of non-compliance in Chippenham & Johnston-Willis’ outpatient facilities, and it has been consistent with meeting or passing charity care conditions outlined on certificates. Due to the high CT utilization (250.3% in 2024), there is an institutional need. The location is within the primary service area and is the primary facility where patients receive care within the proposed zip code.

Approval of the project will not add geographic access to the PD within the 30-minute drive time outlined in the SMFP. The project is feasible with an estimated income of \$894,904 in the first year and \$1,343,186 in the second year. It will require the addition of 4.7 full-time equivalent staff that will be recruited through partnerships with residency programs and schools. Public support cited institutional need and having an outpatient CT scanner for emergency services in the city limits and south of the James River. It was also stated that the location will save time for patients traveling via ambulance and increase the number of patients able to be seen.

DCOPN Staff Recommendations

VA-8859- HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors’ Hospital

The Division of Certificate of Public Need recommends **denial** of HCA Health Services of Virginia, Inc.’s Certificate of Public Need Request number VA-8859 to introduce CT imaging services for the following reasons:

1. The proposal is generally inconsistent with the applicable standards and criteria of the State Medical Facilities Plan and the Eight Required Considerations of the Code of Virginia.
2. The proposed project will significantly impact existing CT imaging services providers.
3. The location of the proposed project is primarily receiving health services from other providers.
4. There is opposition to the project.

VA-8860- Chippenham & Johnston-Willis Hospitals, Inc.

The Division of Certificate of Public Need recommends **conditional approval** of Chippenham & Johnston-Willis Hospitals, Inc.'s Certificate of Public Need Request number VA-8860 to introduce CT imaging services for the following reasons:

1. The proposal is generally consistent with the applicable standards and criteria of the State Medical Facilities Plan and the Eight Required Considerations of the Code of Virginia.
2. There is a deficit of three CT scanners in the Planning District (PD).
3. There is no identified reasonable alternative to the proposed project, and it is more beneficial than the status quo.
4. The applicant has demonstrated an institutional need.
5. The capital costs of the proposed project are reasonable.
6. The proposed project appears to be wholly feasible in the immediate and long-term.
7. There is no known opposition to the project.

DCOPN's recommendation is contingent upon Chippenham & Johnston-Willis Hospitals, Inc.'s agreement to the following charity conditions:

Chippenham & Johnston-Willis Hospital, Inc. will provide CT imaging services to all persons in need of these services, regardless of their ability to pay, and will provide as charity care to all indigent persons free services or rate reductions in services and facilitate the development and operation of primary care services to medically underserved persons in an aggregate amount equal to at least 1.0% of Chippenham & Johnston-Willis Hospital, Inc.'s total patient services revenue derived CT imaging services derived from CT imaging services. Compliance with this condition will be documented to the Division of Certificate of Public Need annually by providing audited or otherwise appropriately certified financial statements documenting compliance with the preceding requirement. Chippenham & Johnston-Willis Hospital, Inc. will accept a revised percentage based on the regional average after such time regional charity care data valued under the provider reimbursement methodology utilized by the Centers for Medicare and Medicaid Services for reimbursement under Title XVIII of the Social Security Act, 42 U.S.C. § 1395 et seq. is available from Virginia Health Information. The value of charity care provided to individuals pursuant to this condition shall be based on the provider reimbursement methodology utilized by the Centers for Medicare and Medicaid Services for reimbursement under Title XVIII of the Social Security Act, 42 U.S.C. § 1395 et seq.

Chippenham & Johnston-Willis Hospital, Inc. will provide CT imaging services to patients who are eligible for benefits under Title XVIII of the Social Security Act (42 U.S.C. § 1395 et seq.), Title XIX of the Social Security Act (42 U.S.C. § 1396 et seq.), and 10 U.S.C. § 1071 et seq. Additionally Chippenham & Johnston-Willis Hospital, Inc. will facilitate the development and operation of primary and specialty medical care services in designated medically underserved areas of the applicant's service area.