

VIRGINIA DEPARTMENT OF HEALTH

Office of Licensure and Certification

Division of Certificate of Public Need

Staff Analysis

July 20, 2026

Re: COPN Request No. VA-8880

**Inova Health Care Services d/b/a Inova Alexandria Hospital
Alexandria, Virginia**

Add One (1) MRI Scanner Through Relocation from the Inova Mark Center

Re: COPN Request No. VA-8882

**Inova Health Care Services d/b/a Inova Loudoun Hospital
Loudoun, Virginia**

Add One (1) MRI Scanner

Re: COPN Request No. VA-8886

**Insight Health Corp., d/b/a RAYUS Radiology
Manassas, Virginia**

Establish a Specialized Imaging Center for MRI Services

Applicant

VA-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

Inova Health Care Services is a 501 (c)(3) Virginia nonstock corporation. The sole member of Inova Health Care Services is the Inova Health System Foundation, also a 501 (c)(3) Virginia nonstock corporation. Inova Alexandria Hospital (“Inova Alexandria”) is a hospital within the system that is currently set to close with services continuing at two new hospitals in the area, including the site of the proposed project, Inova Alexandria Hospital at Landmark (“Inova Alexandria Landmark”) located at 250 Julia Johns Place, Alexandria, Virginia, in Planning District (PD) 8, Health Planning Region (HPR) II.

VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

Inova Health Care Services is a 501 (c)(3) Virginia nonstock corporation. The sole member of Inova Health Care Services is the Inova Health System Foundation, also a 501 (c)(3) Virginia nonstock corporation. The proposed site, Inova Loudoun Hospital (“Inova Loudoun”) is a facility at 44045 Riverside Parkway, Leesburg, Virginia, in PD 8, HPR II.

VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

Insight Health Corporation (“Insight”) is a for-profit stock corporation that was organized in the State of Delaware. Insight is a wholly owned subsidiary of Insight Health Services Corporation. Insight Health Services Corporation is a wholly owned subsidiary of Insight Health Services Holdings Corporation. Insight Health Services Holdings Corporation is a wholly owned subsidiary of Diagnostic Services Holdings, Inc. Insight does business as RAYUS Radiology. The proposed project will be located at 9780 Innovation Drive, Manassas, Virginia, in PD 8, HPR II.

Background

PD 8 had a population of about 2.5 million in 2020 and is projected to grow to over 2.7 million people by 2030, an increase of 6.7% (**Table 1**). The three proposed projects are in separate locations within the PD; with one in Loudoun County and the others in the cities of Alexandria and Manassas. The population of the City of Alexandria, where COPN Request No. VA-8880 is proposed, is projected to be 165,537 in 2030, a 3.8% increase from the 2020 experienced population of 159,467. The growth rate is lower than the projected growth rates of the PD and the state.

Loudoun County, where COPN Request No. VA-8882 is proposed, is projected to have a population of 496,821 in 2030. The experienced population in 2020 was 420,959, meaning that the total population of the county is projected to increase by approximately 18.0%. This is over double that of the PD projected growth rate and nearly four times the growth rate of the state. The country had the third-largest population in 2020, and the increase would maintain this position.

Table 1: Predicted Population Change

Location	Experienced 2020			Predicted 2030			2020-2030 Change		
	Total	18+	65+	Total	18+	65+	Total	18+	65+
Arlington County	238,643	196,971	25,333	258,193	213,060	31,175	8.2%	8.2%	23.1%
Fairfax County	1,150,309	886,225	158,687	1,161,376	910,972	201,526	1.0%	2.8%	27.0%
Loudoun County	420,959	305,007	41,497	496,821	395,787	77,656	18.0%	29.8%	87.1%
Prince William County	482,204	354,528	50,522	534,983	415,392	81,201	10.9%	17.2%	60.7%
City of Alexandria	159,467	130,196	18,758	165,537	129,388	23,477	3.8%	-0.6%	25.2%
City of Fairfax	24,146	19,457	3,871	24,315	19,572	4,740	0.7%	0.6%	22.4%
City of Falls Church	14,658	11,138	2,185	17,317	14,144	2,846	18.1%	27.0%	30.3%
City of Manassas	42,772	31,714	4,505	44,513	33,300	6,801	4.1%	5.0%	51.0%
City of Manassas Park	17,219	12,711	1,343	18,785	14,321	2,306	9.1%	12.7%	71.7%
PD 8	2,550,377	1,947,946	306,701	2,721,840	2,145,937	431,727	6.7%	10.2%	40.8%
Virginia, Statewide	8,631,393	6,729,459	1,395,291	9,060,433	7,217,241	1,826,064	5.0%	7.2%	30.9%

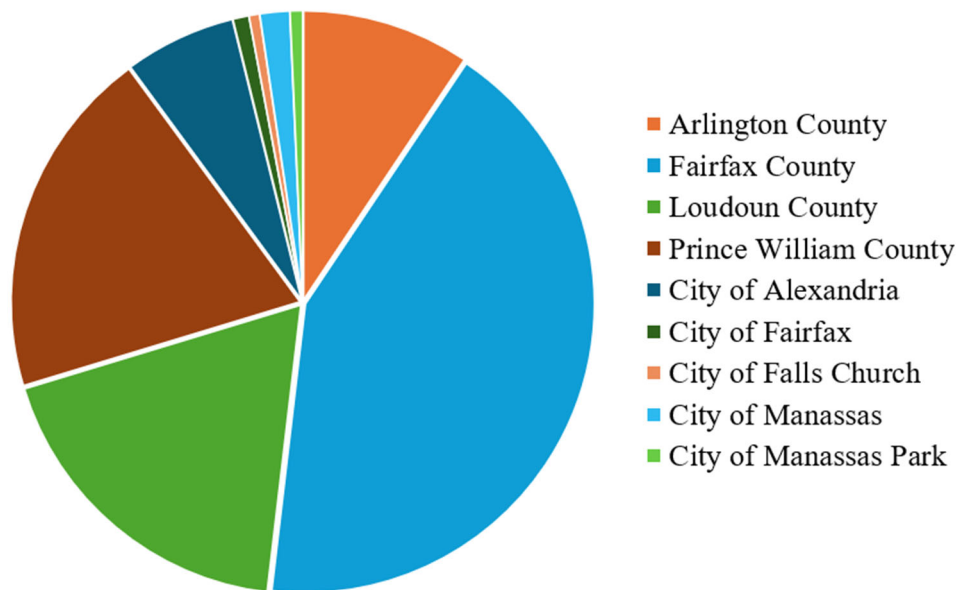
Source: Weldon-Cooper Data (2026)

COPN Request No. VA-8886 has its proposed location on the border between Prince William County and the City of Manassas. Prince William County’s experienced population in 2020 (482,204) is expected to grow 10.9% in the decade leading to 2030, for a population of 534,983 people. This is more than the expected growth rate of the PD and the state as a whole. The

population over the age of 65 in Loudoun County is expected to experience an increase of 60.7% in that same period. The City of Manassas 2020 population was 42,772, and it is expected to increase to 44,513 in 2030 (a change of approximately 4.1%). The growth rate is less than the PD average and the state average.

Figure 1 shows the breakdown of the projected population by locality. All of the localities are expected to see an increase in the population. Of the localities with proposed projects, Loudoun County has the largest population and the largest project growth rate.

Figure 1: Projected PD 8 Population by Locality with Growth Rate (2030)



Source: Weldon-Cooper Data (2026)

A Magnetic Resonance Imaging (MRI) scan uses a magnetic field and computer-generated radio waves to scan the body to create detailed images of organs, tissues, and the skeletal system¹. An MRI creates a three-dimensional (3D) image of the body and provides details about muscles, ligaments, and organs². An MRI scanner utilizes magnetic fields and radio waves. The radio frequency is emitted from the MRI machine and stimulates protons out of equilibrium; once the machine is turned off, the protons return to where they were prior³.

¹ Mayo Clinic. (2023, September 9). *MRI*. <https://www.mayoclinic.org/tests-procedures/mri/about/pac-20384768>

² Akin, O., Do, R., & Plodkowski, A. (2025, June 4). *CT scan vs. MRI: What's the difference?* CT Scan vs. MRI: What's the Difference? | Memorial Sloan Kettering Cancer Center. <https://www.mskcc.org/news/ct-vs-mri-what-s-difference-and-how-do-doctors-choose-which-imaging-method-use>

³ NCBI. (n.d.). *Magnetic Resonance Imaging (MRI)*. National Institute of Biomedical Imaging and Bioengineering. <https://www.nibib.nih.gov/science-education/science-topics/magnetic-resonance-imaging-mri>

Table 2: Inventory and Utilization of Fixed MRI Scanners (2024)

Facility Name	Total Units	Utilization
ED - Inova Emergency Room - Franconia Springfield HealthPlex	1	89.9%
ED - Inova Emergency Room – Leesburg	1	113.5%
ED - Inova Emergency Room - Lorton HealthPlex	1	71.5%
Sentara Advanced Imaging Center (and ED) - Lake Ridge ⁴	1	40.2%
Fairfax Radiology Center of Ballston	1	123.8%
Fairfax Radiology Center of Lansdowne	2	142.1%
Fairfax Radiology Center of Sterling	1	58.4%
Inova Alexandria Hospital	2	95.4%
Inova Centreville MRI Center ⁵	1	163.9%
Inova Fair Oaks Hospital	2	93.5%
Inova Fairfax Hospital ⁶	3	126.6%
Inova Fairfax MRI Center	6	125.7%
Inova Imaging Center - Mark Center	1	66.0%
Inova Loudoun Hospital	1	146.7%
Inova Mount Vernon Hospital	1	116.2%
Inova Reston-Herndon MRI Center	2	149.4%
Insight Imaging Arlington	2	119.3%
Insight Imaging Fairfax	1	123.3%
Insight Imaging Woodbridge	2	114.8%
Kaiser Permanente - Reston Medical Center	1	79.5%
Kaiser Permanente - Tyson's Corner	2	111.5%
Kaiser Permanente - Woodbridge Imaging Center	2	103.3%
MRI of Reston	4	82.0%
Reston Hospital Center	1	87.3%
Sentara Northern Virginia Medical Center	1	99.9%
Stone Springs Hospital Center	1	33.5%
Tysons Corner Diagnostic Imaging	2	141.7%
Tysons MRI and Imaging Center ⁷	1	145.7%
UVA Health Haymarket Medical Center	1	96.2%
UVA Health Prince William Medical Center ⁸	2	55.6%
UVA Outpatient Imaging Centreville ⁹	1	138.3%
Virginia Hospital Center	4	108.3%
Washington Radiology Associates, PLLC	1	57.1%
PD 8 Total	56	105.8%

Source: VHI Database (2024)

⁴ Sentara Advanced Imaging Center- Lake Ridge had a utilization of 40% with 2,002 scans in 2024. ED- Sentara Lake Ridge had performed a total of 8 scans for a utilization of 0.2% in 2024. While the locations reported separately, there is one scanner at the location. The data was combined for **Table 2**.

⁵ This facility is also called the Inova Reston MRI Center.

⁶ COPN No. VA-04889 approved a fourth MRI Scanner

⁷ COPN No. VA-04894 approved a second scanner

⁸ UVA Health Prince William Medical Center misreported three MRI scanners in 2024, but the facility is authorized for two. The utilization shown is with the two authorized.

⁹ COPN No. VA-04752 authorized a second MRI scanner at this location, however, the second scanner was authorized for relocation to a new Gainesville location via COPN No. VA-04905. This will leave one scanner at the Centreville location and one scanner at the Gainesville location.

There were 56 authorized MRI scanners in PD 8, which reported data in 2024, the last year for which data is available (**Table 2**). The scanners averaged a utilization of 105.8% in that year. Of the reporting scanners, one has been authorized for relocation to establish new medical care facilities (**Table 3**). Overall, there are 60 authorized MRI scanners in PD 8.

Table 3: Difference in Fixed MRI Scanner Inventory (2024 VHI and DCOPN)

Facility Name	Fixed MRI Scanners	Authorized Project
<i>Reported to VHI</i>	<i>56</i>	
Inova Fairfax Medical Campus	1	Add one MRI scanner for a total of four ¹⁰ .
Tysons MRI and Imaging Center	1	Add one MRI scanner for a total of two ¹¹ .
VHC Health Outpatient Imaging Center	1	Establish a new medical facility ¹² .
UVA Health Outpatient Imaging Gainesville	1	Establish a new medical facility with one scanner relocated from Centreville ¹³ .
Inova Health Center- Woodbridge	1	Establish a new medical facility with one scanner relocated from Fairfax Radiology Center of Sterling ¹⁴ .
IRMC, LLC d/b/a Prosperity MRI Center	1	Introduce MRI into an existing medical facility ¹⁵ .
<i>Authorized not reporting</i>	<i>4¹⁶</i>	
Total Authorized	60	

Source: VHI Database (2024), DCOPN Inventory

Map 1 shows the location of authorized and proposed MRI scanners in PD 8. The larger map shows the location of authorized facilities with a circled black heart, and each of the proposed projects is marked with a red locator and labeled. A smaller map in the left corner of the image has the zoomed-out view of PD 8 with all locations, a red box marking where the zoomed image outlines.

¹⁰ COPN No. VA-04889 was completed January 2026.

¹¹ COPN No. VA-04894 was expected to be complete by November 2025.

¹² COPN No. VA-04880 was completed November 3, 2025.

¹³ The scanner that is authorized for relocation is not in operation and so does not contribute to the difference in count.

¹⁴ The scanner that is authorized for relocation is not in operation and so does not contribute to the difference in count.

¹⁵ COPN No. VA-04969 is expected to be completed May 2027.

¹⁶ Two projects are relocations so are not listed as new projects.

Map 1: Authorized and Proposed MRI Scanners



Source: ArcGIS, DCOPN Inventory, VHI Records

VA-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

Inova Alexandria is scheduled to close in 2028, with several authorized services relocating to the new Inova Franconia- Springfield Hospital¹⁷ and Inova Alexandria Landmark¹⁸ facilities. While Inova Alexandria is applying for the relocation of the MRI scanner, as described below, the location of the proposed scanner would be at the new Inova Alexandria Landmark facility. COPN No. VA-04832 authorized the relocation and replacement of one of the MRI scanners currently at Inova Alexandria to Inova Alexandria Landmark. When Inova Alexandria Landmark was authorized, the applicant also requested a second MRI scanner at the location; the request was denied by the Health Commissioner.

VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

Inova Loudoun is a 211-bed hospital that is the only trauma center in Loudoun County. The hospital currently has two MRI scanners, however only one is located at the main hospital. The second is reporting to VHI as the ED - Inova Emergency Room – Leesburg (Inova Leesburg Medical Campus), approximately 7.5 miles from Inova Loudoun. The scanner at Inova Loudoun is available 24 hours a day, 7 days a week, for inpatient and emergency patients. Outpatient scans are provided

¹⁷ COPN No. VA-04832 authorized for the relocation of 110 acute-care beds, five operating rooms, one CT scanner, and one MRI scanners from Inova Alexandria. One CT scanner and one MRI scanner were also approved to be relocated from Inova Springfield HealthPlex, along with the addition of one CT scan to the PD inventory.

¹⁸ COPN No. VA-04793 authorized for the relocation of 192 acute care beds, six operating rooms, two CT scanners, one MRI scanner, two linear accelerators, brachytherapy services, two cardiac catheterization labs, and specialty level neonatal special care services from Inova Alexandria to Inova Alexandria Landmark and the addition of one fixed CT scanner at the Landmark site.

“on a scheduled basis Monday through Friday from 7:00 a.m. to 7:00 p.m., and on Saturday and Sunday from 7:00 a.m. to 5:00 p.m.”

VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

Insight is a multi-state company, with five existing locations within the state of Virginia, four in northern Virginia. The proposed project will be located at a new northern Virginia campus in Manassas. Of the locations in Northern Virginia, there are two Insight facilities, each of which has one MRI scanner and one computed tomography (CT) scanner.

Proposed Project

VA-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

Inova Health Care Services is proposing the relocation and replacement of the existing MRI scanner from Inova Alexandria’s Inova Mark Center to the Inova Alexandria Landmark location, so the proposal is inventory-neutral. The scanner will be the second MRI scanner authorized to the location. The Inova Mark Center is expected to close once the lease expires in 2028. The applicant states that this is due to “problems with the aged facility.” The cost of relocation and replacement of the scanner at the Inova Mark Center, as well as the construction of the area, is expected to cost \$2,891,796 (**Table 4**)

Table 4: Capital Costs

Direct Construction Cost	\$ 256,926
Equipment Not in Construction	\$ 2,555,892
Site Acquisition and Preparation	-
Architect and Engineering Fees	\$ 73,682
Other Consultant Fees	\$ 5,296
Total Capital Costs	\$ 2,891,796

Source: COPN Request No. VA-8880

The proposed project will be approximately 1,165 gross square feet, or 1,019 net square feet. Should the proposed project receive a certificate, services will begin in Quarter 4 of 2028.

VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

Inova Loudoun is proposing the addition of one MRI scanner to the hospital’s main campus. The hospital has an existing shell space where the proposed project will be in a suite on the first floor of the main hospital. The proposed project will be approximately 1,150 gross square feet, or 1,045 net square feet. The remodeling for the scanner will begin upon receipt of the certificate, if the proposed project is approved. Capital costs for the project are estimated to be \$4,544,203 (**Table 5**).

Table 5: Capital Costs

Direct Construction Cost	\$ 1,337,000
Equipment Not in Construction	\$ 2,722,382
Site Acquisition and Preparation	\$ 37,600
Architect and Engineering Fees	\$ 338,391
Other Consultant Fees	\$ 108,830
Total Capital Costs	\$ 4,544,203

Source: COPN Request No. VA-8882

Should the proposed project receive a certificate, services will begin in September 2027¹⁹.

VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

Insight is proposing the establishment of a specialized imaging facility for the provision of MRI services, with one MRI scanner. The applicant states that there is an existing patient base in the area, with patients currently traveling to the other existing RAYUS locations. The proposed site of the project will be located in 7,545 net square feet on the ground floor of the building. As the building currently exists, capital costs include the renovation of the space and radiation shielding around the scanner. Capital costs are projected to be \$2,879,720 (**Table 6**).

Table 6: Capital Costs

Direct Construction Cost	\$ 746,496
Equipment Not in Construction	\$ 1,480,569
Site Acquisition and Preparation	\$ 512,331
Architect and Engineering Fees	\$ 37,324
Other Consultant Fees	\$ 103,000
Total Capital Costs	\$ 2,879,720

Source: COPN Request No. VA-8886

Should the proposed project receive a certificate, services will begin in March 2027²⁰.

Project Definition

VA-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

Section 32.1-102.1:3 of the Code of Virginia defines a project, in part, as “[t]he addition by an existing medical care facility described in subsection A of any new medical equipment for the provision of... magnetic resonance imaging (MRI)” Subsection A, in part, defines medical care facilities as “[a]ny facility licensed as a hospital.”

VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

Section 32.1-102.1:3 of the Code of Virginia defines a project, in part, as “[t]he addition by an existing medical care facility described in subsection A of any new medical equipment for the

¹⁹ This date assumes a certificate issuance on or before September 8, 2026.

²⁰ This date assumes a certificate issuance on or before September 8, 2026.

provision of... magnetic resonance imaging (MRI)” Subsection A, in part, defines medical care facilities as “[a]ny facility licensed as a hospital.”

VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

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 described in subsection A.” Subsection A, in part, defines a medical care facilities as “[a]ny specialized center or clinic or that portion of a physician's office developed for the provision of... magnetic resonance imaging (MRI).”

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.**

The population in PD 8 is expected to reach approximately 2,828,990 in 2030, a 6.7% increase from the 2020 population (**Table 1**). This is a higher growth rate than Virginia as a whole. The projects proposed are in three different localities of PD 8: the City of Alexandria, Loudoun County, and the City of Manassas. **Table 7** shows the documented poverty rate of the localities of the PD as well as the experienced population in 2024, the last year for which data is available.

Table 7: Poverty Rate in PD 8 (2024)

Location	Population in Poverty	Total Population	Poverty Percentage
Arlington County	19,024	237,800	8.0%
Fairfax County	69,264	1,154,400	6.0%
Loudoun County	19,078	443,674	4.3%
Prince William County	32,448	491,636	6.6%
City of Alexandria	11,831	157,747	7.5%
City of Fairfax ²¹	2,020	25,897	7.8%
City of Falls Church	690	15,000	4.6%
City of Manassas	3,928	43,165	9.1%
City of Manassas Park	1,205	16,507	7.3%
PD 8	159,488	2,585,827	6.2%
Virginia	839,669	8,568,051	9.8%

Source: US Census SIAPE (2024)

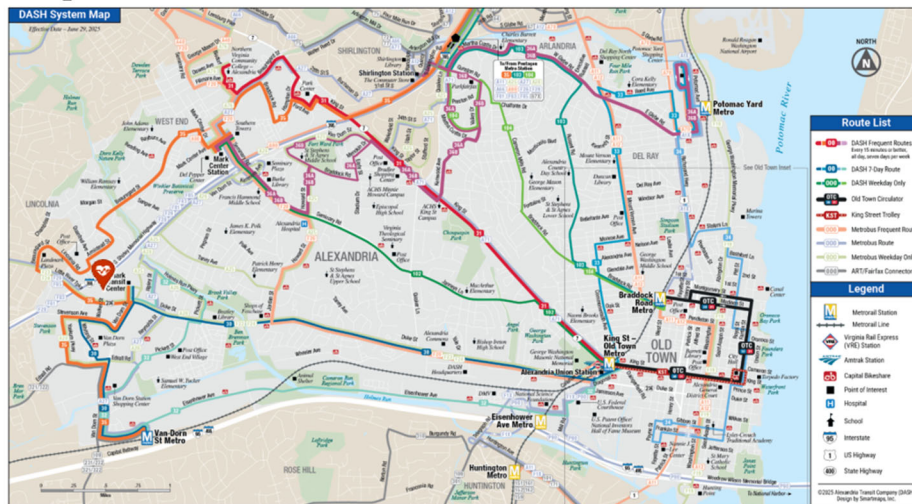
²¹ The 2024 population of the City of Fairfax has already passed the 2030 projected population (25,358) estimated by Weldon-Cooper in 2020. The population of the city is growing at a greater rate than originally predicted.

VA-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

The population of the City of Alexandria is projected to be 176,403 in 2030, a 3.8% increase from the 2020 experienced population. In 2024, the last year for which poverty data is available, the city had a poverty rate of 7.5% (**Table 7**). This percentage equated to approximately 11,831 people living in the city in poverty. The rate is lower than that of the state (9.8%), but higher than the average poverty rate of the PD (6.2%).

Inova Alexandria Landmark will be located at an intersection of Duke Street (State Route 236), I-395, as well as an intersection of Duke Street and N Van Dorn Street (State Route 401). Multiple bus routes serve the location of the hospital, and the site is one mile from the Van Dorn Street Metro Station. The hospital is currently being developed, with a plan to begin services in January 2028. DCOPN is not aware of any changes in the bus stops expected after completion of the project, but should there be any changes at the site, there is a bus stop at Duke Street and Walker Street nearby.

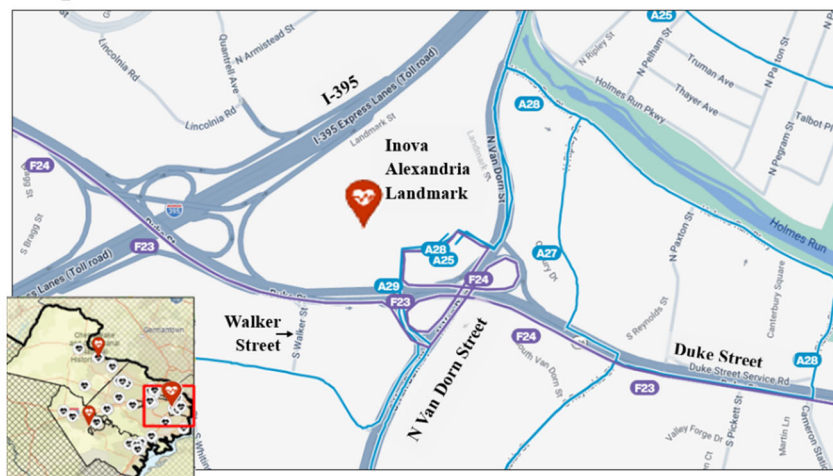
Map 2: DASH Bus Routes near Inova Alexandria Landmark



Source: ArcGIS, DCOPN Inventory, DASH Website

Alexandria has free bus routes via the DASH program (**Map 2**), and the site of Inova Alexandria Landmark also receives services from the Washington Metropolitan Area Transit Authority (WMATA), as shown in **Map 3**. In both maps, the location of the proposed project is shown with a red heart symbol, and the bus routes are highlighted with various other colors. In **Map 3**, the relation of the map to the PD is shown in the map in the left corner of the image, highlighted with a red rectangle.

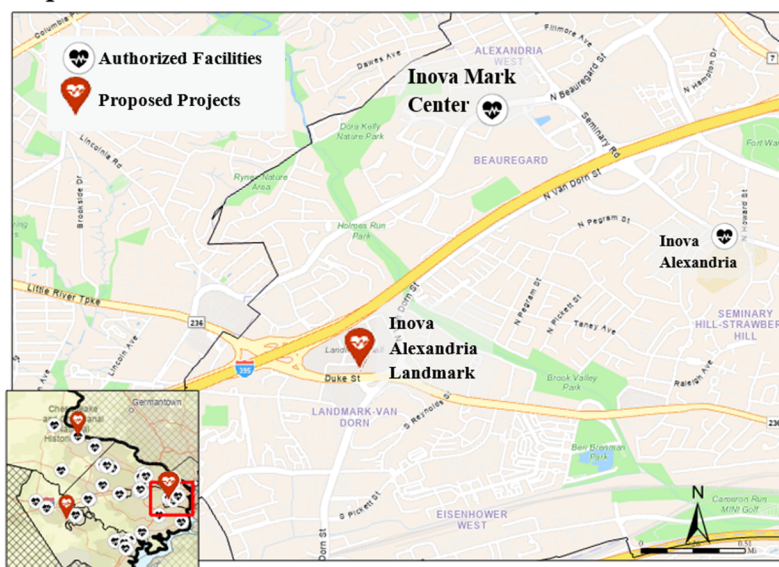
Map 3: WMATA Bus Routes near Inova Alexandria Landmark



Source: ArcGIS, DCOPN Inventory, WMATA Website

WMATA services are not free, with a fee ranging from \$1.10 to \$4.80 depending on the type of route. Bus services run from 5 am to midnight, Sunday through Thursday. Extended hours are provided on Friday and Saturday, with services ending around 2 am.

Map 4: Inova Alexandria Landmark in Relation



Source: ArcGIS, DCOPN Inventory, VHI Records

The proposed project would add the MRI scanner through relocation from the Inova Mark Center, located approximately 2 miles away (**Map 4**). The distance is estimated at around a 10-minute drive or a 30-minute bus route²². The MRI scanner proposed for relocation is currently providing services at the Inova Mark Center. The applicant states that the Inova Mark Center “facility is aged, poorly configured by today’s standard for imaging services delivery, and the equipment has reached the

²² The bus route time was estimated using Google Maps and averaging available routes over several days.

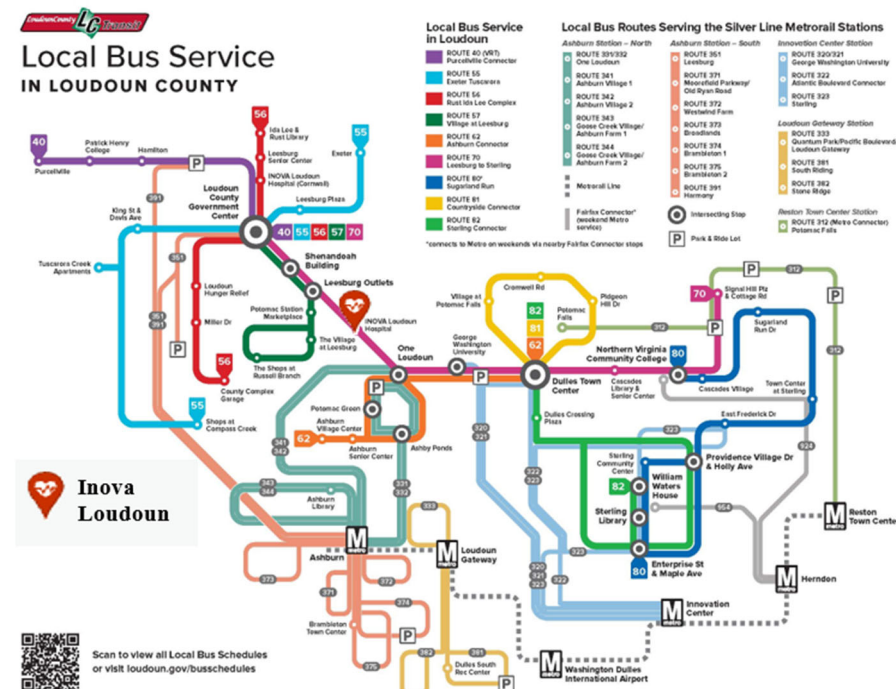
end of its useful life”. With the proposed project, the scanner will be replaced prior to being relocated to Inova Alexandria Landmark. Inova Alexandria Landmark is not currently providing services but is authorized for one scanner through relocation from Inova Alexandria once Inova Alexandria closes. The applicant states that the high volume at Inova Alexandria currently shows a need for additional MRI scanners at Inova Alexandria Landmark and the proposed project does not add to the existing PD 8 MRI inventory.

VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

Loudoun County is projected to have a population of 496,821 in 2030, an increase of 18% from the 2020 experienced population of 420,959. In 2024, the county had a 4.3% poverty rate, with approximately 19,078 people in the county living in poverty (**Table 7**). The rate is lower than that of the state (9.8%) and lower than the average poverty rate of the PD (6.2%).

Inova Loudoun is on a bus line that feeds to other lines across the county. **Map 5** shows the bus lines in the county from the transit system’s website, with a red marking from DCOPN to show where the hospital is in relation to the stops. While Inova Loudoun is only directly serviced by Route 70, shown as the violet line, there are nearby stops that connect to multiple other routes and metro stops. Local bus rides are free, while lines designated as commuter routes to other cities in PD 8 or Washington, DC, have a fee ranging from \$11 to \$12 one-way.

Map 5: Loudoun County Bus Lines

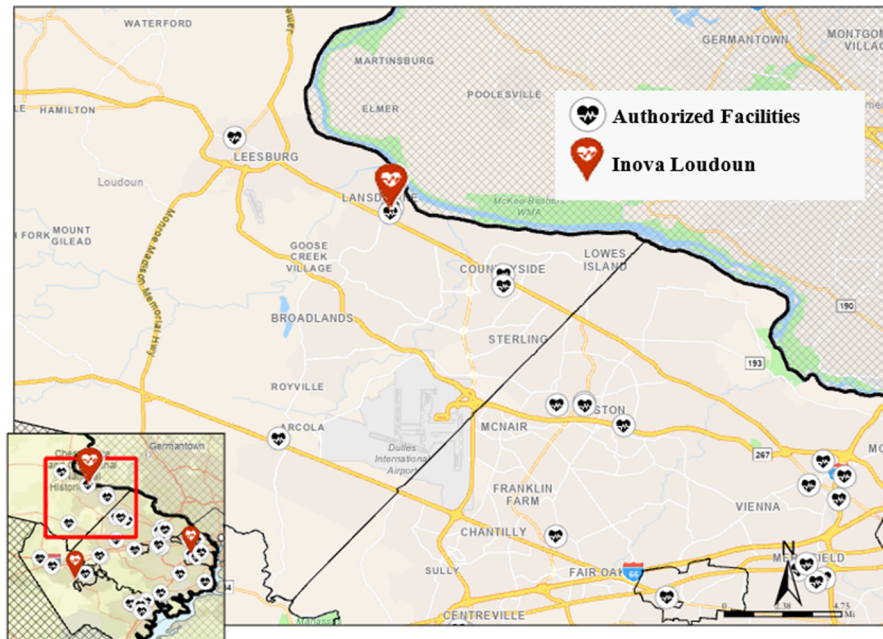


Source: Loudoun County Transit System Map

The location of the proposed project is along Interstate 7, with connections to Interstate 267 and Highway 15 approximately 5 miles to the northwest and connections to Interstate 267 and Highway

495 approximately 15 miles to the southeast. However, between the southeast connections and Inova Loudoun, there are two other facilities with MRI scanners along the same road. **Map 6** shows the relationship of Inova Loudoun and other authorized facilities with MRI scanners in the area. In the bottom right of the map there is a zoomed-out map that shows the relation of the larger area in the PD.

Map 6: Major Roadways Near Inova Loudoun



Source: ArcGIS, DCOPN Inventory, VHI Records

The applicant states that there are currently two MRI scanners that provide services to Inova patients under the license of Inova Loudoun. The first is located at the hospital and treats people receiving inpatient, outpatient, and emergency services; the second is located at the Inova Leesburg Medical Campus for outpatient cases. The Inova Leesburg Medical Campus is located approximately 7.5 miles northwest of the Inova Loudoun campus. Combined, the two MRI scanners performed 13,009 procedures in 2024, the last year for which data was available, making an average utilization per scanner of approximately 130.1% of the SMFP expansion threshold. Inova Loudoun alone had a utilization of 146.7% of the threshold. The applicant states that the volumes were higher in 2025 and approval of the proposed project will “address the high utilization... and related capacity constraints,” ensuring services are available to care for the growing population.

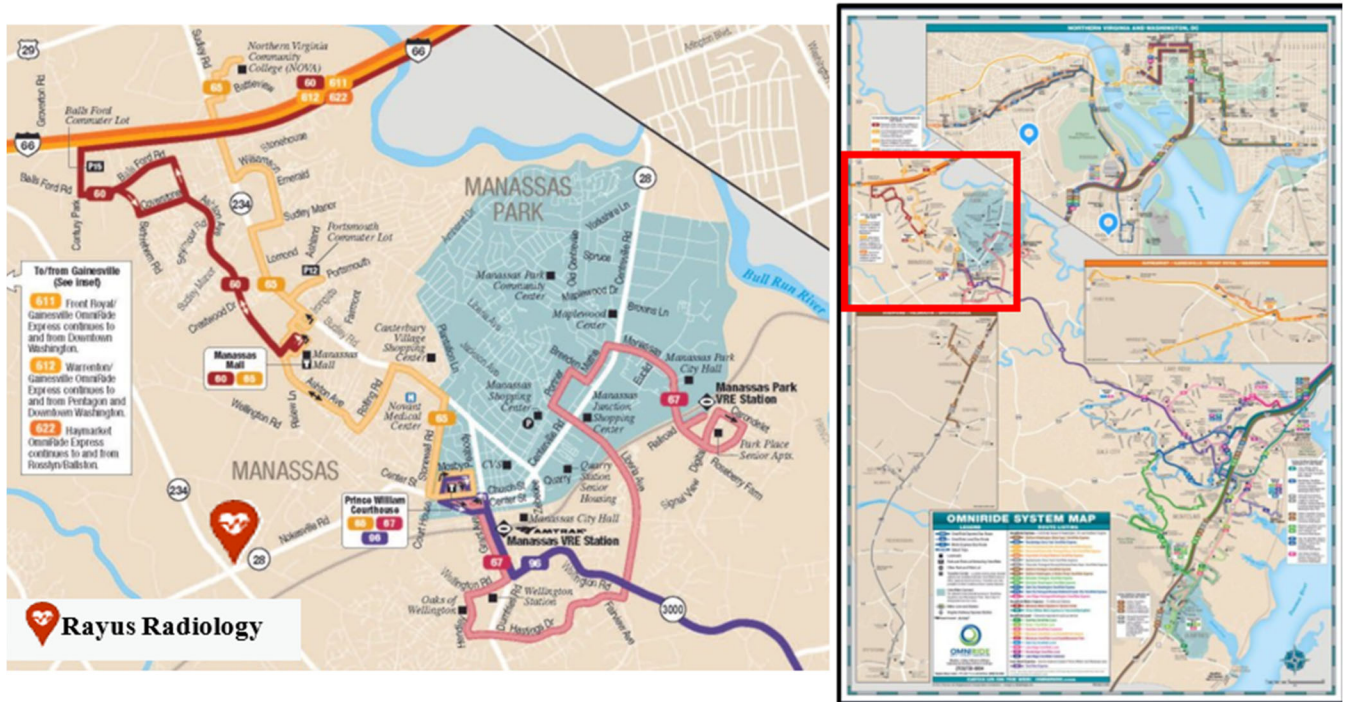
VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

The population of the City of Manassas is projected to be 33,300 in 2030, a 4.1% increase from the 2020 experienced population of 42,772. In 2024, the county had a 9.1% poverty rate, approximately 3,928 people in the city (**Table 7**). The rate is slightly lower than that of the state (9.8%), but higher than the average poverty rate of the PD (6.2%). Of the competing projects, the

City of Manassas has the highest poverty percentage; however, the city has the fourth lowest population and number of individuals in poverty.

The proposed project is located close to Prince William County, which is expected to have a population growth of 10.9% between the 2020 experienced population (482,204) and the projected 2030 population (534,983). The city also experienced a poverty rate of 6.6% in 2024 which was lower than the state's but higher than the PDs.

Map 7: OmniRide Bus Lines



Source: OmniRide Website, ArcGIS, DCOPN Inventory

The City of Manassas is serviced by the OmniRide bus system, which also connects to surrounding areas in PD 8. **Map 7** shows the system-wide map on the right with each bus route highlighted by various colors; a red box shows the portion that provides services to the city directly. This portion is expanded further with the map on the left. While the maps are from the OmniRide bus website, DCOPN has added a pin symbol showing the location of the proposed project. The proposed site of RAYUS Radiology is not directly served by any of the bus routes; however, there is a bus stop approximately 3.3 miles from the location. The site is located at the intersection of Highway 28 and Interstate 234.

The applicant states that approval of the proposed project will “promote continuity of care and benefit patients and physicians alike... [reducing] travel times and [improving] wait times.” Due to the utilization of existing Insight facilities operating above 100% of the SMFP threshold in 2024, the applicant states that a new facility will provide the same level of care to additional patients without increasing wait times. In order to continue to accommodate patient schedules, Insight facilities provide imaging services in the evenings and on weekends.

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:

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

VA-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

DCOPN received seven letters of support from Inova physicians for the project and a letter of commitment on behalf of the medical staff at the facility. The letters, in aggregate, stated the following:

- The population is growing and with it is an increase in MRI volumes. Approval of the proposed project will reduce delays and support the “growing needs of our community,”
- There is one authorized MRI scanner at the facility and there is need for an additional scanner to improve efficiency.
- Timely access to MRI services is critical for the timely treatment of various neurological and neurosurgical conditions.

Other than the letters written above, there were no other comments of support. There is no known opposition to the project.

Public Hearing

DCOPN provided notice to the public regarding this project, inviting public comments on May 8, 2026. The public comment period closed on June 24, 2026. On June 15, 2026, the Health Systems Agency of Northern Virginia (HSANV) held a public hearing for the project. Inova Alexandria Landmark’s project was presented by: Paul Dryer, Senior Director, Strategy & Planning, Inova Health System; Sean McCleary, Vice President, Inova Health System; Patrick Oliverio, MD, President, Fairfax Radiological Consultants and Inova Health System’s Division Chief for Diagnostic Radiology. The presentation and answers to staff questions, posed during the hearing, included the following:

- Inova Alexandria has high utilization and an institution-specific need for additional MRI capacity to meet current and projected demand.
- Inova Mark Center’s MRI was installed in 2011 and is near the end of its useful life.
- Relocation of the scanner is within the primary service area of the facility and is not expected to have a noticeable effect on other service providers.
- Inova Mark Center is a department of Inova Alexandria, and there will be no change in the status of services.

There was no other public comment regarding the project.

VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

DCOPN received four letters of support from Inova physicians for the project and a letter of commitment on behalf of the medical staff at the facility. The letters, in aggregate, stated the following:

- MRI volumes are increasing, which results in high utilization and capacity constraints.
- Cardiac MRI imaging allows for more accurate diagnoses and timely treatment.

Other than the letters written above, there were no other comments of support. There is no known opposition to the project.

Public Hearing

DCOPN provided notice to the public regarding this project, inviting public comments on May 8, 2026. The public comment period closed on June 24, 2026. On June 15, 2026, the Health Systems Agency of Northern Virginia (HSANV) held a public hearing for the project. Inova Loudoun's project was presented by: Jessica Parker, Senior Director, Strategy & Planning, Inova Health System; Christopher Chiantella, MD, Chief Medical Officer, Inova Loudoun Hospital; Patrick Oliverio, MC, President, Fairfax Radiological Consultants. The presentation and answers to staff questions, posed during the hearing, included the following:

- Inova Loudoun's MRI scanner²³ is heavily used.
- Approval of the proposed project will add capacity to respond to current and near-term demand and is not expected to affect the operations of nearby service providers.
- Service volumes are expected to remain above the 5,000 SMFP threshold per scanner.

There was no other public comment regarding the project.

VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

DCOPN received eight letters of support from community physicians as well as a letter of commitment on behalf of the medical staff at the facility. The letters, in aggregate, stated the following:

- Approval of the project will increase timely diagnoses and treatment as well as improve clinical outcomes.
- There are currently complications with MRI providers where MRI scanners are "overbooked or unable to accommodate certain insurance plans." When patients have to travel outside of the PD, this can cause financial and transportation burdens.

²³ The presentation and HSANV staff report stated two scanners- one at the hospital's campus and the other at the Leesburg Medical Campus. Due to the scanners being reported separately and at different campuses, DCOPN considers them as separate which is reflected in this analysis.

On June 12, 2026, the Chief Operating Officer of the University of Virginia Community Health (UVACH) and the Assistant Vice President of Operations of Prince William Medical Center wrote in opposition to the proposed project. The letter stated the following points:

- The proposed location of the project is only 3.5 miles from UVA Health Prince William, which had the second-lowest MRI utilization of hospitals in 2024. Three other UVACH facilities are also within 20 minutes of the proposed site.
- The proposed project does not qualify for institutional need as the SMFP provision does not include projects that would impact existing providers.
- The proposed project would impact UVACH, as RAYUS currently provides 2,000 scans for patients in the area, yet projects 3,701 scans in the second year.
- UVACH provides care to the community at lower cost to patients, but the approval of the proposed project may affect this as it could divert “the most profitable procedures, coupled with cherry-picking better-insured patients [which] can have a significant adverse impact on non-profit community hospitals... weakening essential community providers.”
- The proposed project does not introduce a service model that UVACH is not currently providing.

On June 22, 2026, counsel for the applicant wrote a response to the June 12th letter of opposition. The letter stated the following points:

- UVA Health Prince William has low MRI utilization due to issues with insurance reimbursement; some insurance providers “refuse to authorize outpatient MRI services at hospitals because of the high facility fees compared to freestanding imaging centers.”
- UVACH’s comments about the distance between projects are not aligned with previous projects.
- The expected population growth indicates an increase in the need for MRI services.
- RAYUS Radiology has an institutional need due to high volumes at all three existing centers²⁴, and the proposed location is within the service area.
- Approval of the proposed project will introduce institutional competition outside of UVA facilities, competing with each other²⁵. The claim of “cherry-picking” clients is unsupported and RAYUS Radiology has partnerships with clinics designed to serve people uninsured or underinsured.
- Due to the high volumes at all three RAYUS Radiology locations, and the distance between each, adding an MRI scanner at one facility will not address the need at all.

²⁴ The letter did not state which facility the institutional need was connected to.

²⁵ There are other service providers outside of UVACH such as Inova Health Care Services, Sentara, Kaiser Permanente, and Insight Imaging Woodbridge located within Prince William County. The facilities are over 10 miles away from the proposed facility.

On June 24, 2026, UVACH responded to the June 22nd letter. In this letter, it was stated that:

- The two acute UVACH hospitals close to the site of the proposed project serve as safety-net hospitals and serve patients regardless of ability to pay. Approval of the proposed project will impact the ability to provide care at the same level.
- As the proposed project “duplicates” the model of UVA Health Outpatient Imaging Gainesville, UVACH states that approval will “divert patients from that facility, will exacerbate the diversion from [UVA Prince William], and will undermine the projected utilization” of existing providers.
- While Medicare does have higher reimbursement rate for hospital-based scans, the rates are set by Medicare and there is still need for MRI scans in acute hospital environments.
- HSANV stated a concern in the June 15 Board of Directors Meeting that RAYUS Radiology’s patients would be attracted from other nearby services for the long-term sustainability of the proposed project.

On July 7, 2026, counsel for RAYUS Radiology responded to the letter. In this letter, it was stated that:

- There are space constraints at current facilities that would prevent the addition of a second MRI scanner at any of the existing locations.
- The facility is applying for institutional need via the volumes at the Woodbridge location. The high volumes were repeated in the letter along with the position that adding a scanner at one location will not address the high volumes at the other two existing Insight locations.
- The patient base difference between the UVACH acute hospital locations and the proposed project’s outpatient facility were repeated.
- The comments in UVACH’s letter about the HSANV Board Meeting’s disapproval of the project are not cohesive to the HSANV voting in approval of the proposed project.

On July 14, 2026, the Executive Director of HSANV, Dean Montgomery, wrote a letter on behalf of the agency responding to the July 7th assertions. The letter stated that:

- There was not a specific reason given by any board member for the reason of the recommendation at the meeting or in the staff report. RAYUS Radiology’s claim that it was due to institutional need is false.
- Existing Insight locations have higher than average procedure to visit ratios, with “nearly 14% higher than the regional freestanding average of 1.10 procedures per visit and more than 16 % higher than the hospital-based service regional average of 1.07 procedures per scanner.”

On July 14, 2026, UVACH responded to the July 7th letter from RAYUS Radiology as well. This letter states:

- The proposed project is premature due to the two freestanding specialized imaging centers, each with one MRI, opening since December 2025 in the PD. One opened in December 2025 and the other in May 2026.

- The proposed project will “diminish resources that support essential hospital services, including care provided to uninsured and underinsured patients.”
- The impact on the existing providers cannot be adequately estimated at the current time as there are two facilities which have been started services since December 2025.

Other than the letters written above, there were no other comments of support.

Public Hearing

DCOPN provided notice to the public regarding this project inviting public comments on May 8, 2026. The public comment period closed on June 24, 2026. On June 15, 2026, the Health Systems Agency of Northern Virginia (HSANV) held a public hearing for the project. ILH’s project was presented by Harrison Gibbs, Counsel, RAYUS Radiology. The presentation and answers to staff questions, posed during the hearing, included the following:

- There are three RAYUS Radiology facilities, with five total MRI scanners, in northern Virginia, and all have high annual service volumes.
- The facilities are currently providing MRI services to approximately 2,700 patients in Prince William County.
- Western Prince William County is primarily served by UVA Community Health; approval of the proposed project will provide increased patient choice for residents.
- RAYUS does not believe that the expansion of its Woodbridge service has affected demand at the two nearby Sentara Northern Virginia Medical Center MRI services.
- Much of the population in the projected service area for the new service resides as close or closer to the Woodbridge service than to the proposed Manassas area service.

There was no other public comment regarding the project.

(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.

The projected volumes and the impact of each proposed project are further discussed in the section on the analysis of the relationship of the proposed projects to the existing health care system. To prevent duplication of the analysis, this section identifying reasonable alternatives will reference utilizations but will not fully compare the existing utilization and efficiency of existing services. For the more in-depth analysis, please see the appropriate consideration below²⁶.

VA-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

Inova Alexandria Landmark was authorized to be created, along with Inova Franconia-Springfield, following the closure of Inova Alexandria. If the 2024 MRI procedure volume was

²⁶ Consideration Five discusses 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.

halved between the two new facilities, Inova Alexandria Landmark would have a utilization of 95.4% with one scanner. When the procedures volume from Inova Mark Center is included in as well²⁷, Inova Alexandria Landmark is projected to have a utilization of 148.2% with the one authorized scanner. While procedure volume will likely vary with the closures and creation of the new hospitals, the projection of 148.2% would indicate a need for a second scanner at the hospital.

The applicant has stated that volumes increased at the existing Inova Alexandria in 2025, meaning higher utilization at the currently open facilities, which would then transfer upon relocation and closing. Waiting to see the volumes of MRI scanners upon the closure of Inova Alexandria and the opening of the subsequent hospitals, prior to adding a second scanner, could place current patients of Inova Alexandria at risk of not having effective and efficient access to MRI scanning services. DCOPN is not aware of a reasonable alternative that would be more effective and efficient.

When Inova Alexandria Landmark was originally approved, the applicant applied for two MRI scanners at the location. At the time, the hospital's two authorized MRI scanners had a combined utilization of 70.6%. There was also a surplus of 17 MRI scanners in the PD at the time. Not only have these factors changed, but the current proposal is for an inventory-neutral relocation of an MRI scanner to the new Inova Alexandria Landmark.

VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

Inova Loudoun had a 2024 utilization rate of 146.7% of the SMFP threshold (**Table 8**). The utilization would decrease to 73.3% with the addition of another scanner, based on the 2024 volumes. PD 8 also had an average utilization of 107.1% of the SMFP standard on the 56 reporting MRI scanners in 2024, with 60 total MRI units authorized for the PD. There is also no Inova MRI scanner that could be relocated to the proposed location as the scanner with the lowest utilization in 2024 was the Inova Mark Center (66%), which is already proposed to relocate to the Inova Alexandria Landmark campus. Due to the existing volume and utilization of the MRI scanner at Inova Loudoun, DCOPN is not aware of a reasonable alternative that would be more effective and efficient.

²⁷ Not all the Inova Mark Center MRI volumes are being calculated with Inova Alexandria Landmark. The applicant states that it expects for 80% of the volume (2,638.4 scans) to be relocated to Inova Alexandria Landmark and the other 20% (659.6 scans) going to Inova Franconia-Springfield.

Table 8: Inova Loudoun Projected Utilization (2024 Volumes)

Inova Loudoun Main Campus	Facility Type	Total Fixed Units	Total MRI Procedures	Utilization
Experienced Utilization (2024)	Acute Hospital	1	7,333	146.7%
Proposed Project Utilization	Acute Hospital	2	7,333	73.3%

Source: VHI Records

VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

Insight Imaging has three existing facilities in the PD, which combined produced 29,578 procedures in 2024, the last year for which data is available. Insight Imaging Woodbridge is the closest of the existing Insight Imaging facilities to the proposed site located within the bordering county of Prince William and has a utilization of approximately 114.8% of the SMFP threshold.

There are five MRI scanners that have been authorized but are not reporting volumes to VHI. This includes one scanner less than six miles from the proposed location, UVA Health Outpatient Imaging Gainesville (approximately 6 miles away), and another scanner in the same county, Inova Health Center- Woodbridge (approximately 19 miles away). UVA Health Outpatient Imaging Gainesville has started providing services but has not completed a year of operations. A reasonable alternative to the proposed project would be to wait to see the MRI imaging service volume upon the completion of a full year of service.

However, the proposed location for the project is located on the border of the City of Manassas and Prince William County, with the physical address being in the City of Manassas. Both areas are expected to have population increases in the decade between 2020 and 2030, with the City of Manassas having an increase of 10.0% for the total population and 46.4% for the population over 65 years. Prince William County's total population is expected to have an increase of 10.9%, with the population over 65 years having an expected increase of 60.7% in the same period.

(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.

VA-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

The HSANV board of directors reviewed Inova Alexandria's proposed project on June 15, 2026. The Board voted eight in favor, and none opposed, to recommend approval of the application. The recommendation is based on review of the proposed project, the HSANV staff report, information provided at the June 15th meeting, and findings and conclusions, including:

- The proposal is an inventory-neutral, maintenance-of-effort project. It entails the replacement and relocation of Inova's Mark Center MRI service.
- Inova's Mark Center MRI scanner is fifteen years old and must be replaced.
- Relocation of the service to Inova Alexandria Hospital campus would not result in a change in status or service area.

- The project is consistent with SMFP requirements.
- The capital cost of the project is within the range commonly seen for MRI services.
- There is no indication or reason to believe the project would affect any other service negatively. There is no known opposition to the proposal.

VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

The HSANV board of directors reviewed Inova Loudoun's proposed project on June 15, 2026. The Board voted eight in favor, and none opposed, to recommend approval of the application. The recommendation is based on review of the proposed project, the HSANV staff report, information provided at the June 15th meeting, and findings and conclusions, including:

- Inova Loudoun Hospital's MRI scanners are heavily used. Service volumes are more than twice the SMFP planning standard.
- The hospital qualifies for consideration to add MRI capacity under institutional need.
- Projected capital costs are reasonable, within the range seen for similar projects locally and statewide.
- Adding capacity to respond to current and near-term demand would not affect the operations of other service providers.
- The project is consistent with the applicable provisions of the SMFP as they have been applied in similar circumstances.
- There is no known opposition to the proposal.

VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

The HSANV board of directors reviewed RAYUS Radiology's proposed project on June 15, 2026. The Board voted five in favor and two opposed, with one abstention, to recommend approval of the application. The recommendation is based on review of the proposed project, the HSANV staff report, information provided at the June 15th meeting, and findings and conclusions, including:

- RAYUS Radiology MRI services in northern Virginia have high use. Average use in 2024, the relevant reporting period, was about 95% of the service volume standard of 5,000 patient visits per scanner. RAYUS indicates that use increased in 2025.
- RAYUS serves more than 2,000 patients from the greater western Prince William County area at its Arlington, City of Fairfax, and Woodbridge services. Many prospective patients from this area are expected to use the new service if it becomes available.
- Notwithstanding the concerns of UVA Community Health and others, the likely effects of adding three new MRI services in the county in quick succession are uncertain.
- The potential merits of the project outweigh likely negative system effects.
- The capital cost of the project is within the range commonly seen for local MRI services.

(iv) Any costs and benefits of the project.

In the analysis of the proposed projects, the capital costs of similar authorized projects were compared (**Table 9**). To compare the costs and consider the variation in site acquisition and

equipment costs, the projected direct construction cost included in the application was divided by the net square footage in each project. Capital cost of similar authorized projects ranges from \$61.69 to \$603.23 per square foot.

Table 9: Comparisons with Similar Recent Projects

COPN Certificate	PD	Capital Cost	Direct Construction Cost	Net Square Feet	Cost Per Square Feet
VA-04972	20	\$ 2,415,986	\$ 935,000	1,550	\$ 603.23
VA-04969	8	\$ 3,772,642	\$ 144,720	2,346	\$ 61.69
VA-04952	20	\$ 10,106,088	\$ 2,765,000	5,000	\$ 553.00

COPN Request No.	PD	Capital Cost	Direct Construction Cost	Net Square Feet	Cost Per Square Feet
VA-8880	8	\$ 2,891,796	\$ 256,926	1,019	\$ 252.14
VA-8882	8	\$ 4,544,203	\$ 1,337,000	1,045	\$ 1,279.43
VA-8886	8	\$ 2,879,720	\$ 746,496	7,545	\$ 98.94

Source: DCOPN Records, COPN Request No. VA-8880, 8882, 8886.

VA-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

Inova Alexandria Landmark has a projected capital cost of \$2,891,796, with a direct construction cost of \$252.14 per square foot (**Table 4**). This cost is comparable to recent projects (**Table 10**). Inova Alexandria Landmark is still being built so the cost of the proposed project would be added to the current construction occurring. The largest portion of the capital cost (88.4%) is for the MRI scanner and assorted equipment not included in construction costs.

Table 4: Capital Costs *(as shown above)*

Direct Construction Cost	\$ 256,926
Equipment Not in Construction	\$ 2,555,892
Site Acquisition and Preparation	-
Architect and Engineering Fees	\$ 73,682
Other Consultant Fees	\$ 5,296
Total Capital Costs	\$ 2,891,796

Source: COPN Request No. VA-8880

All costs will be funded through accumulated reserves. The applicant states that the costs will not be financed or have an impact on the provision of care. With the expected high volume of MRI scans as the Inova Mark Center and Inova Alexandria close, approval of the proposed project at Inova Alexandria Landmark would allow the patients to be treated effectively and efficiently. The project is inventory neutral, as well, as the MRI scanner would be relocated from the Inova Mark Center.

VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

Inova Loudoun has a projected capital cost of \$4,544,203, with a direct construction cost of \$1,279.43 per square foot. This cost is double the cost of COPN VA-04972, which had the highest cost per square foot of similar, recently authorized projects (**Table 10**). Included in the cost of the proposed project are electrical rewiring, installation of safety and infection control measures, as well as the inclusion of new mechanical systems. Direct construction is approximately 29.4% of the capital cost, with equipment not included in construction costs, the largest portion at 59.9%. Equipment costs not included in the direct construction estimate include the MRI scanner, furnishings, signage, and assorted electronic data.

Table 5: Capital Costs *(as shown above)*

Direct Construction Cost	\$ 1,337,000
Equipment Not in Construction	\$ 2,722,382
Site Acquisition and Preparation	\$ 37,600
Architect and Engineering Fees	\$ 338,391
Other Consultant Fees	\$ 108,830
Total Capital Costs	\$ 4,544,203

Source: COPN Request No. VA-8882

The applicant states that approval of the proposed project would allow the hospital to meet growing population needs. It wrote:

As the home of Loudoun County’s only designated trauma center, [Inova Loudoun] must always have adequate MRI capacity available to treat its patient population. The addition of one MRI unit will address the high utilization of the existing MRI units and related capacity constraints and ensure adequate MRI services are available to care for the [Inova Loudoun] patient population as it continues to grow.

VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

RAYUS Radiology has a projected capital cost of \$2,879,720, with a direct construction cost of \$98.94 per square foot (**Table 6**). This cost is comparable to recent projects and the least expensive of the proposed projects competing in this cycle (**Table 10**). Included in the costs are the renovation of an existing building to be able to safely and effectively accommodate MRI imaging services, including the inclusion of MRI shielding and other protective measures. The applicant states that the “building also has existing unleased space, which could allow for future expansion, should that be deemed necessary.”

Table 6: Capital Costs

(as shown above)

Direct Construction Cost	\$ 746,496
Equipment Not in Construction	\$ 1,480,569
Site Acquisition and Preparation	\$ 512,331
Architect and Engineering Fees	\$ 37,324
Other Consultant Fees	\$ 103,000
Total Capital Costs	\$ 2,879,720

Source: COPN Request No. VA-8886

The applicant states that the proposed project will:

“[reduce] travel times and improve wait times at all four RAYUS Radiology facilities. As proposed, it will allow physicians to read patient scans faster, assisting with a quick and accurate understanding of the patient’s condition before deciding on the appropriate treatment plan or any additional procedures, often when time is of the essence. By releasing the pressure of excess utilization, RAYUS Radiology - Manassas offers a more streamlined process, improving the relationship between the physician, radiologist, and patient. Physicians will be able to refer patients to the nearest comprehensive, low-cost center, and patients will benefit from the option to have necessary scans performed with the same provider that they have trusted with their previous care.”

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

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. **Table 10** shows that the average charity care provided in HPR II in 2024, the last year for which data is available, was 2.3% of gross patient revenues.

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

HPR I	Gross Patient Revenues	Charity Care	% of Gross Patient Revenues
Inpatient Hospitals			
UVA Health Prince William Medical Center	\$ 716,331,491	\$ 41,008,588	5.7%
Sentara Northern Virginia Medical Center	\$ 1,113,165,093	\$ 51,702,306	4.6%
Encompass Health Rehab Hosp of Northern Virginia	\$ 48,211,597	\$ 1,826,742	3.8%
Inova Alexandria Hospital	\$ 1,694,182,731	\$ 50,440,661	3.0%
Inova Mount Vernon Hospital	\$ 890,441,286	\$ 23,371,040	2.6%
Inova Fairfax Hospital	\$ 7,540,856,971	\$ 166,576,158	2.2%
Inova Loudoun Hospital	\$ 1,677,819,433	\$ 37,476,979	2.2%
Virginia Hospital Center	\$ 1,256,027,025	\$ 27,903,630	2.2%
Inova Fair Oaks Hospital	\$ 2,408,582,527	\$ 52,039,581	2.2%
Dominion Hospital	\$ 187,238,481	\$ 3,760,816	2.0%
Reston Hospital Center	\$ 2,254,004,397	\$ 19,684,028	0.9%
StoneSprings Hospital Center	\$ 582,717,334	\$ 4,566,302	0.8%
North Spring Behavioral Healthcare	\$ 82,497,344	\$ 230,098	0.3%
UVA Health Haymarket Medical Center	\$ 386,285,597	\$ 8,866,919	2.3%
Inova Specialty Hospital	\$ 84,305,852	\$ -	0.0%
Northern Virginia Community Hospital			
Pentagon City Hospital			
HPR II Inpatient Hospital Median			2.2%
HPR II Total Inpatient \$ & Mean %	\$ 20,922,667,159	\$ 489,453,848	2.3%

HPR I	Gross Patient Revenues	Charity Care	% of Gross Patient Revenues
Outpatient Centers			
HealthQare Services ASC, LLC	\$ 13,632,136	\$ 1,310,762	9.6%
Stone Springs Ambulatory Surgery Center	\$ 76,406,627	\$ 3,149,654	4.1%
Inova Ambulatory Surgery Center at Lorton	\$ 10,368,192	\$ 108,312	1.0%
Northern Virginia Eye Surgery Center, LLC	\$ 19,079,771	\$ 31,456	0.2%
Inova Surgery Center @ Franconia-Springfield	\$ 103,157,360	\$ 71,790	0.1%
Haymarket Surgery Center	\$ 78,596,299	\$ 48,654	0.1%
Northern Virginia Surgery Center	\$ 68,941,715	\$ 33,412	0.1%
Reston Surgery Center	\$ 195,891,966	\$ 75,099	0.0%
McLean Ambulatory Surgery Center	\$ 54,482,314	\$ 24,067	0.0%
Inova Loudoun Ambulatory Surgery Center	\$ 101,605,217	\$ 18,748	0.0%
Fairfax Surgical Center	\$ 181,894,940	\$ 16,493	0.0%
Prince William Ambulatory Surgery Center	\$ 86,151,992	\$ 11,406	0.0%
Lake Ridge Ambulatory Surgical Center	\$ 14,168,726	\$ 275	0.0%
Kaiser Permanente Tysons Corner Surgery Center	\$ 51,140,777	\$ -	0.0%
Kaiser Permanente Caton Hill Ambulatory Surgery Center	\$ 23,894,258	\$ -	0.0%
Pediatric Specialists of Virginia Ambulatory Surgery Center	\$ 9,187,308	\$ -	0.0%
VHC Ambulatory Surgery Center			
HPR II Outpatient Hospital Median			0.0%
HPR II Total Outpatient Hospital \$ & Mean %	\$ 1,088,599,598	\$ 4,900,128	0.5%
HPR II Hospital Median			1.6%
HPR II Total Hospital \$ & Mean %	\$ 22,011,266,757	\$ 494,353,976	2.3%

Source: VHI Reports

VA-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

In the Pro Forma, Inova Alexandria showed a charity care rate of 4.3%. The applicant clarified in supplemental responses, however, that while the charity rate is expected to be 4.3%, the proposed project would be included in the system-wide charity care rate of Inova Health Care Services (3.9%). Should the proposed project be approved, a charity care rate of 3.9% will be included.

VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

Inova Loudoun calculated a charity care rate of 3.5% in its Pro Forma. While 3.5% is higher than the HPR average, the applicant clarified in supplemental responses that the proposed project would be included in the system-wide charity care rate of Inova Health Care Services (3.9%). Should the proposed project be approved, a charity care rate of 3.9% will be included.

VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

RAYUS Radiology proffered a charity care rate of 5.0% in the Pro Forma. Neither RAYUS Radiology nor the parent company of Insight Health Corporation reported charity care in 2024, the last year for which data is available. DCOPN does not have data showing that either facility has provided charity care in the past on existing certificates. As the proffered amount is higher than the HPR average, should the proposed project be approved, a charity care rate of 5.0% will be included.

(vi) 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 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 SMFP.

The SMFP contains criteria/standards for the establishment or expansion of MRI imaging services. They are as follows:

Part 1.

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-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

(i) Inova Alexandria, as well as the Inova system, has an overall history of completing projects within 12 months of the expected completion date and within the authorized budget. (ii) Inova Alexandria Landmark has the middle capital cost of the competing projects in this report. DCOPN is not aware of any information stating that the costs are not credible. (iii) Inova Alexandria Landmark is currently under construction and therefore not yet approved by the state hospital licensure or federal certification. Inova Alexandria does not have any state or federal complaints for imaging services as of the publishing of this report. (iv) Inova has a system-wide charity care rate of 3.9%, which DCOPN recommends be attached to the certificate should the project be approved. The applicant is expecting that the proposed project will have a charity care rate of 4.3%.

VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

(ii) Inova Loudoun, as well as the Inova system, has an overall history of completing projects within 12 months of the expected completion date and within the authorized budget. (ii) Inova Loudoun has the highest estimated capital cost of the competing projects in this report. DCOPN is not aware of any information stating that the costs are not credible. (iii) Inova Loudoun does not have any state or federal complaints for imaging services as of the publishing of this report. (iv) Inova has a system-wide charity care rate of 3.9%, which DCOPN recommends be attached to the certificate should the project be approved.

VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

(i) RAYUS Radiology does not have a consistent history of completing projects within 12 months of the expected completion time. The last three certificates awarded to the facility were COPN No. VA-04380, VA-04663, and VA-04879. COPN No. VA-04380 was expected to be completed on August 31, 2013, and was completed on March 16, 2016. COPN No. VA-04663 was expected to be completed on March 1, 2020, and was completed on May 4, 2021. COPN No. VA-04879 was expected to be completed on October 31, 2024, and was completed on February 20, 2026. (ii) RAYUS Radiology has the lowest estimated capital cost of the competing projects in this report. DCOPN is not aware of any information stating that the costs are not credible. (iii)

The proposed project is a freestanding imaging facility and therefore is not bound by hospital state licensure or federal certification regulations. (iv) The applicant is proffering a charity care condition of 5.0%. As stated before, however, neither RAYUS Radiology nor the parent company of Insight Health Corporation reported charity care in 2024, the last year for which data is available. DCOPN does not have data showing that either facility has provided charity care in the past on existing certificates.

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 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.**

12VAC5-230-160 of the SMFP states, in part, that 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”. **Figure 2** shows the utilization of MRI scanners in the two parent health systems applying for the three proposed projects.

Figure 2: Inova Health System and Insight Imaging Fixed MRI Utilization (2024)

Inova Health Systems

Facility Name	Facility Type	Total Units	Total MRI Procedures	Utilization
ED - Inova Franconia Springfield HealthPlex	Freestanding ED	1	4,494	89.9%
ED - Inova Leesburg	Freestanding ED	1	5,676	113.5%
ED - Inova Lorton HealthPlex	Freestanding ED	1	3,574	71.5%
Inova Alexandria Hospital	Acute Hospital	2	9,543	95.4%
Inova Centreville MRI Center	Freestanding	1	8,194	163.9%
Inova Fair Oaks Hospital	Acute Hospital	2	9,347	93.5%
Inova Fairfax Hospital	Acute Hospital	3	18,984	126.6%
Inova Fairfax MRI Center	Freestanding	6	37,704	125.7%
Inova Imaging Center - Mark Center	Freestanding	1	3,298	66.0%
Inova Loudoun Hospital	Acute Hospital	1	7,333	146.7%
Inova Mount Vernon Hospital	Acute Hospital	1	5,809	116.2%
Inova Reston-Herndon MRI Center	Freestanding	2	14,944	149.4%
Fairfax Radiology Center of Ballston	Freestanding	1	6,189	123.8%
Fairfax Radiology Center of Lansdowne	Freestanding	2	14,206	142.1%
Fairfax Radiology Center of Sterling	Freestanding	1	2,918	58.4%
Total Inova Facilities		26	152,213	117.1%

Insight Imaging

Facility Name	Facility Type	Total Units	Total MRI Procedures	Utilization
Insight Imaging Arlington	Freestanding	2	11,932	119.3%
Insight Imaging Fairfax	Freestanding	1	6,166	123.3%
Insight Imaging Woodbridge	Freestanding	2	11,480	114.8%
Total Insight Imaging Facilities		49	293,176	119.7%

Source: VHI Database (2024), DCOPN Inventory

VA-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

- A. Based on the 2024 utilization of the Inova Alexandria scanners, the facility does not apply for institutional need. The facility operated at 95.4% of the SMFP threshold for MRI expansion. The applicant states that the facility operated above the threshold for 2025; those numbers have not yet been published by VHI but are experienced volumes. As calculated elsewhere in this report, should the Inova Mark Center close and the volume shift to the Inova Alexandria facility in the percentage predicted (with 80% of the volume going to the new hospital), it would indicate an institutional need at that time.
- B. There are no MRI scanners at Inova facilities that are underutilized (**Figure 2**). The Fairfax Center of Sterling had the lowest utilization in 2024 (58.4%), which is the last year for which data is available; however, the center closed in April 2026 with the scanner relocated to Inova Health Center Woodbridge via COPN No. VA-04895. The facility with the second lowest utilization (66.0%) was Inova Mark Center, which is set to

close, with the scanner proposed to be replaced and relocated to Inova Alexandria Landmark.

- C. Inova Alexandria Landmark is not a nursing home facility.
- D. Pursuant to **12VAC5-230-160**, as cited above, the establishment of MRI imaging services at a location other than a facility that qualifies for institutional need is allowed. As such, the applicant is not applying for the establishment of new services, but the expansion of existing MRI imaging services at a new location.

VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

- A. Inova Loudoun operated at a utilization volume of 146.7% of the SMFP threshold in 2024. The volume qualifies the applicant for institutional need. The applicant states that due to the facility being the only designated trauma center in Loudoun County, having an MRI scanner available to diagnose and treat patients is critical for efficient and effective care. Due to the high utilization, the applicant states that a second MRI scanner at the hospital is necessary.
- B. There are no MRI scanners at Inova facilities that are underutilized available to be relocated (**Figure 2**). The Fairfax Center of Sterling had the lowest utilization in 2024 (58.4%), which is the last year for which data is available; however, the center closed in April 2026 with the scanner relocated to Inova Health Center Woodbridge via COPN No. VA-04895. The facility with the second lowest utilization (66.0%) was Inova Mark Center, which is set to close, with the scanner proposed to be replaced and relocated to Inova Alexandria Landmark.
- C. Inova Loudoun is not a nursing home facility.
- D. Inova Loudoun is not applying for new services, but for the expansion of existing services at the existing Inova Loudoun main campus.

VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

- A. RAYUS Radiology states that there is an institutional need at each of the three locations in northern Virginia and the “addition of one MRI scanner to any of the three facilities would address the institutional need at that facility, but it would not address the... [need] at all three.” The applicant asserts that for the overall need to be addressed, it would need the establishment of a separate location for the provision of MRI imaging services.
- B. There are no MRI scanners at Insight Imaging facilities in PD 8 which are operate under 100% of the SMFP threshold for expansion (**Figure 2**).
- C. RAYUS Radiology is not a nursing home facility.
- D. Pursuant to **12VAC5-230-160**, as cited above, the establishment of MRI imaging services at a location other than a facility that qualifies for institutional need is allowed. As such, the applicant is not applying for the establishment of new services, but the expansion of existing MRI imaging services at a new location.

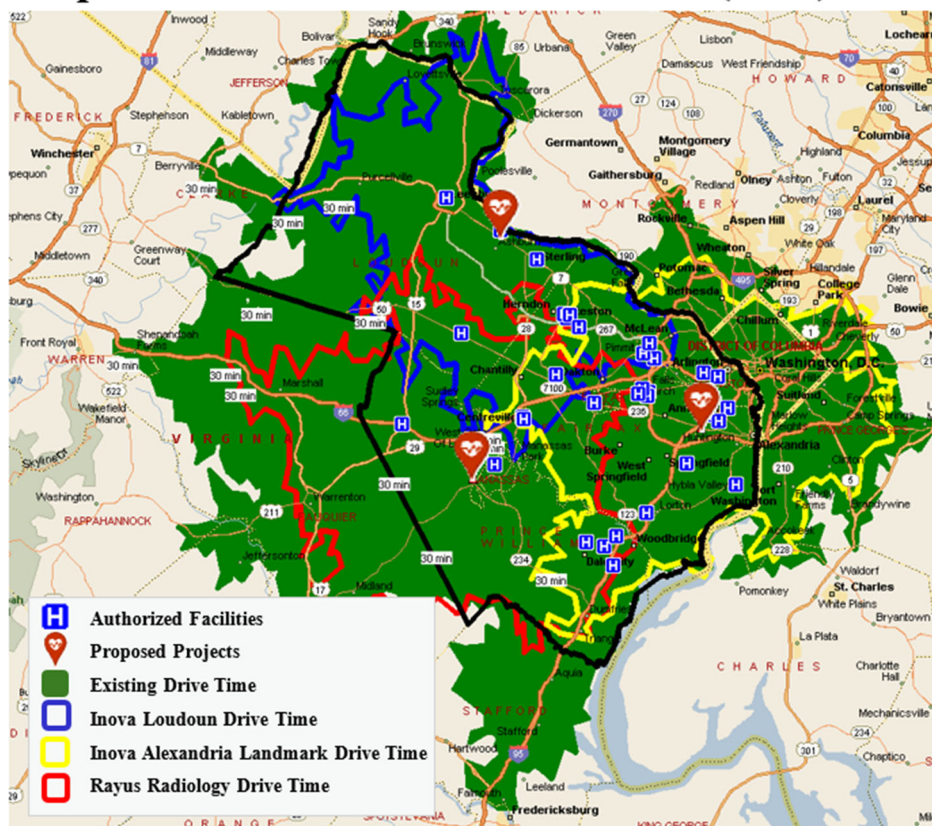
Article 2. Criteria and Standards for Magnetic Resonance Imaging

12VAC5-230-140. 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.

Map 8 shows the geographic accessibility of MRI services in PD 8 within a 30-minute driving time. The dark green shows the existing accessibility from authorized facilities, marked with blue symbols. The proposed drive time within 30 minutes of each facility is marked with a different color outline: Inova Loudoun is marked blue, Inova Alexandria Landmark is marked in yellow, and RAYUS Radiology is marked in red. The population in areas covered by the drive time equates to approximately 95% of the PD's population.

Map 8: Drive Time with MRI Services (PD 8)



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

VA-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

Inova Alexandria Landmark's proposed project 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-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

Inova Loudoun's proposed project 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 scanners, including those already authorized at the facility.

VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

RAYUS Radiology's proposed project 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.

12VAC5-230-150. 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.

VA-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital & VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

This criterion does not apply to the proposed projects. Neither of the applicants is applying for new fixed site services, but rather the expansion of existing services.

VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

PD 8 had an average of approximately 5,356 procedures per scanner in 2024; this is above the 5,000-procedure average required by the SMFP guideline. Within the existing Insight facilities, there were a total of 29,578 MRI procedures in 2024 on the then authorized 5 scanners. This equates to an average of 5,916 procedures per scanner in the year (**Table 12**).

12VAC5-230-160. 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.

299,935 MRI scans, including inpatient and outpatient procedures, occurred in 2024 on the 56 scans operating in PD 8 during that time (**Table 12**). This equates to an average of approximately 5,356 procedures per scanner in the PD.

To determine the number of MRI scanners needed in the PD, the number of scans performed in the last year available (299,935) was divided by the SMFP threshold of 5,000 procedures. This equated to a need for 60.0 scanners. As of the publishing of this report, there are exactly 60 authorized scanners in PD 8.

Table 11: Average CT Procedures Performed and Utilization in 2024 (PD 8)

Facility Name	Total Scanners	Total MRI Procedures	Average Procedures Per Scanner	Utilization
Facilities Connected to Inova Health Services				
ED - Inova Emergency Room - Franconia Springfield HealthPlex	1	4,494	4,494	89.9%
ED - Inova Emergency Room - Leesburg	1	5,676	5,676	113.5%
ED - Inova Emergency Room - Lorton HealthPlex	1	3,574	3,574	71.5%
Inova Alexandria Hospital	2	9,543	4,772	95.4%
Inova Centreville MRI Center	1	8,194	8,194	163.9%
Inova Fair Oaks Hospital	2	9,347	4,674	93.5%
Inova Fairfax Hospital	3	18,984	6,328	126.6%
Inova Fairfax MRI Center	6	37,704	6,284	125.7%
Inova Imaging Center - Mark Center	1	3,298	3,298	66.0%
Inova Loudoun Hospital	1	7,333	7,333	146.7%
Inova Mount Vernon Hospital	1	5,809	5,809	116.2%
Inova Reston-Herndon MRI Center	2	14,944	7,472	149.4%
Fairfax Radiology Center of Ballston	1	6,189	6,189	123.8%
Fairfax Radiology Center of Lansdowne	2	14,206	7,103	142.1%
Fairfax Radiology Center of Sterling	1	2,918	2,918	58.4%
<i>Subtotal</i>	26	152,213	5,854	117.1%
Facilities Connected to Insight Imaging				
Insight Imaging Arlington	2	11,932	5,966	119.3%
Insight Imaging Fairfax	1	6,166	6,166	123.3%
Insight Imaging Woodbridge	2	11,480	5,740	114.8%
<i>Subtotal</i>	5	29,578	5,916	118.3%
Other PD 8 Reporting Facilities				
Sentara Advanced Imaging Center (and ED) - Lake Ridge	1	2,010	2,010	40.2%
Kaiser Permanente - Reston Medical Center	1	3,973	3,973	79.5%
Kaiser Permanente - Tyson's Corner	2	11,148	5,574	111.5%
Kaiser Permanente - Woodbridge Imaging Center	2	10,326	5,163	103.3%
MRI of Reston	4	16,397	4,099	82.0%
Reston Hospital Center	1	4,366	4,366	87.3%
Sentara Northern Virginia Medical Center	1	4,997	4,997	99.9%
Stone Springs Hospital Center	1	1,677	1,677	33.5%
Tyson's Corner Diagnostic Imaging	2	14,165	7,083	141.7%
Tyson's MRI and Imaging Center	1	7,287	7,287	145.7%
UVA Health Haymarket Medical Center	1	4,808	4,808	96.2%
UVA Health Prince William Medical Center	2	5,559	2,780	55.6%
UVA Outpatient Imaging Centreville	1	6,914	6,914	138.3%
Virginia Hospital Center	4	21,660	5,415	108.3%
Washington Radiology Associates, PLLC	1	2,857	2,857	57.1%
<i>Subtotal</i>	25	118,144	4,726	94.5%
PD 8 Total	56	299,935	5,356	107.1%

Source: VHI Data

VA-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

As stated above, PD 8 had an average of approximately 5,356 procedures per scanner in 2024; this is above the 5,000-procedure average required by the SMFP guideline. The applicant is part

of the Inova Health Care Services system, which performed a total of 152,213 MRI procedures in 2024 on the then authorized 26 scanners. This equates to an average of 5,854 procedures per scanner in the year, approximately 117.1% of the SMFP threshold (**Table 11**).

VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

As stated above, PD 8 had an average of approximately 5,356 procedures per scanner in 2024; this is above the 5,000-procedure average required by the SMFP guideline. The applicant is part of the Inova Health Care Services system, which performed a total of 152,213 MRI procedures in 2024 on the then authorized 26 scanners. This equates to an average of 5,854 procedures per scanner in the year, approximately 117.1% of the SMFP threshold (**Table 11**).

12VAC5-230-170. 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.**

VA-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital & VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital & VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

This criterion does not apply to the proposed projects. None of the applicants is applying for mobile MRI services, but rather the expansion of fixed services.

12VAC5-230-180. Staffing.

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

VA-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

The applicant states that “Inova’s MRI services are under the direct supervision of board-certified and trained radiologists.”

VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

The applicant states that “Inova’s MRI services are under the direct supervision of board-certified and trained radiologists.”

VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

The applicant states that MRI services will be under the supervision of board-certified radiologists from the partnering service of Capital Imaging Associates²⁸.

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-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

Inova Mark Center is expected to close in 2028 due to the applicant not wanting to renew the lease. The closure of the facility has the potential to leave a gap in care provided, due to patients no longer being able to receive services at the facility, and no other facilities offering MRI services in the City of Alexandria. The applicant has stated that the proposed project is expected to provide care for approximately 80% of the patient volume currently at the Inova Mark Center.

The proposed project is not anticipated to foster institutional competition. Outside of the City of Alexandria, the majority of facilities offering MRI services nearby are owned or associated with Inova Health Care Services. The only facility in the area that is not affiliated with Inova is Insight Imaging- Arlington and is located approximately 6.2 miles from the proposed location of Inova Alexandria Landmark. DCOPN notes, however, that Inova owns 45.0% of MRI scanners in PD 8. While this is not the majority of scanners, the health system does have the most of any of other health provider in the PD. Approval of the proposed project would increase the majority hold.

VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

The proposed project is not anticipated to foster institutional competition. Inova Loudoun is one of two hospitals in Loudoun County, and, except for Washington Radiology Associates, PLLC, all facilities in the county offering MRI services are owned by or affiliated with Inova Health Care Services. As stated above, DCOPN notes that Inova owns 45.0% of MRI scanners in PD 8. While this is not the majority of scanners, the health system does have the most of any of other health provider in the PD. Approval of the proposed project would increase the majority hold.

VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

²⁸ Association of Alexandria Radiologists was originally stated to read the scans, however RAYUS Radiology’s Medical Director Mark C. Lopiano, MD, has moved to Capital Imaging Associates as confirmed in a June 18 email from the applicant’s counsel.

Of the five closest authorized facilities to the proposed location, four of them (83.3%) are owned and operated by UVA Health Services. The other facility is owned by Inova Health Care Services. Insight Imaging has another facility, Insight Imaging- Woodbridge, in the county but it is located approximately 30 minutes from the proposed location. Approval of RAYUS Radiology's proposed project would increase the options for imaging services in the area.

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.

VA-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

The Inova Alexandria Landmark facility has not been established so there is no volume at the site to compare with for the expansion of MRI imaging services. The proposed location is close to the original Inova Alexandria hospital, and a short distance from the Inova Mark Center that the applicant has stated will be closing pending the termination of the lease in 2028. **Figure 3** shows the volume of MRI imaging scans performed at the Inova Mark Center and Inova Alexandria completed in 2024, with projected future utilization should the volumes remain the same.

Figure 3: Projected Utilization Changes with 2024 Volumes
2024

2024 Facilities	Facility Type	Total Fixed Units	Total MRI Procedures	Utilization
Inova Alexandria Hospital	Acute Hospital	2	9,543	95.4%
Inova Imaging Center - Mark Center	Freestanding	1	3,298	66.0%
		3	12,841	85.6%
After Completion of COPN VA-04832				
2024 Facilities	Facility Type	Authorized Fixed Units	Total MRI Procedures	Utilization
Inova Franconia Springfield	Acute Hospital	1	5,431	108.6%
Inova Alexandria Landmark	Acute Hospital	1	7,410	148.2%
Proposed Project (Impact on)	Proposed Project	Authorized Fixed Units	Total MRI Procedures	Utilization
Inova Alexandria Landmark	Acute Hospital	2	7,410	74.1%

Source: VHI Records

In 2024, Inova Mark Center completed 3,298 procedures (66.0% of the SMFP threshold), and Inova Alexandria completed 9,543 procedures (95.4% of the SMFP threshold). Inova Alexandria has been authorized for the MRI scanners to be relocated to new hospitals, one to the new Inova Franconia-Springfield Hospital and the other to the new Inova Alexandria Landmark Hospital. If the volumes are evenly distributed between the facilities, and 80% of the Inova Mark Center procedures (2,638 procedures) transfer to Inova Alexandria Landmark (totaling 7,410 procedures), the new hospital will have a utilization of 161.4% of the SMFP threshold with the currently authorized one scanner. Should the proposed project be approved and the facility have two MRI scanners, the same volume would have a utilization of 80.7% of the SMFP threshold (**Figure 3**).

The applicant has stated that volumes increased in 2025, meaning higher utilization at the currently open facilities which would then transfer upon relocation and closing. Waiting to see the volumes of MRI scanners upon the closure of Inova Alexandria and the opening of the subsequent hospitals prior to adding a second scanner, could place current patients of Inova Alexandria at risk of not having effective and efficient access to MRI scanning services.

As stated above, many facilities near the location of Inova Alexandria Landmark are owned by or affiliated with Inova Health Care Services. The only facility in the area that is not affiliated is Insight Imaging- Arlington and is located approximately 6.2 miles from the proposed location of Inova Alexandria Landmark. Due to the high utilization of Insight Imaging- Arlington in 2024 (119.3%) while Inova Alexandria and Inova Mark Center are still operational, it is not anticipated that approval of the proposed project would negatively impact the existing provider.

VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

Table 8, copied below, shows the volume of MRI imaging scans performed at Inova Loudoun in 2024, with projected future utilization should the volumes remain the same, and the proposed project be approved. The hospital had a utilization rate of 146.7% of the SMFP threshold of expansion in said year. Should the proposed project be approved, the utilization with the same volume would be approximately 73.3%.

Table 8: Inova Loudoun Projected Utilization (2024 Volumes) *(as shown above)*

Inova Loudoun Main Campus	Facility Type	Total Fixed Units	Total MRI Procedures	Utilization
Experienced Utilization (2024)	Acute Hospital	1	7,333	146.7%
Proposed Project Utilization	Acute Hospital	2	7,333	73.3%

Source: VHI Records

Outside of the Inova Loudoun MRI services, there are two other related facilities near the proposed project. Fairfax Radiology Center of Landsdowne, which is partnered with Inova Loudoun and is across the street from the hospital's campus, had a utilization of 142.1% of the SMFP threshold in 2024. Inova Leesburg Medical Campus is approximately 5.8 miles from the hospital's campus and had a utilization of 113.5% of the SMFP threshold in 2024. Together, the utilization was 136.1% of the SMFP threshold; the utilization would decrease to 108.9% with the proposed project's addition of one MRI scanner (**Figure 4**).

Figure 4: Inova Loudoun Affiliated Locations Projected Utilization (2024 Volumes)

2024

Location	Facility Type	Authorized Fixed Units	Total MRI Procedures	Utilization
Inova Loudoun Hospital	Acute Hospital	1	7,333	146.7%
Fairfax Radiology Center of Lansdowne	Freestanding	2	14,206	142.1%
Inova Leesburg Medical Campus	Freestanding ED	1	5,676	113.5%
		4	27,215	136.1%

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Location	Facility Type	Proposed Fixed Units	Total MRI Procedures	Utilization
<i>Inova Loudoun Hospital</i>	<i>Acute Hospital</i>	2	7,333	73.3%
Fairfax Radiology Center of Lansdowne	Freestanding	2	14,206	142.1%
Inova Leesburg Medical Campus	Freestanding ED	1	5,676	113.5%
		5	27,215	108.9%

Source: VHI Records

The applicant states that the MRI imaging volumes increased in 2025, with Inova Loudoun and the Inova Leesburg Medical Campus performing a combined 14,999 MRI procedures in the year (Figure 4).

VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

Of the total MRI scanners in the PD reporting volumes in 2024, the utilization was approximately 105.8%. Insight's MRI scanners reported volumes of 29,57 procedures in the year for a utilization of 118.3% the same year.

As stated before, there are five MRI scanners that have been authorized but are not reporting volumes to VHI. This includes one scanner less than six miles from the proposed location, UVA Health Outpatient Imaging Gainesville (approximately 6 miles away), and another scanner in the same county, Inova Health Center- Woodbridge (approximately 19 miles away). UVA Health Outpatient Imaging Gainesville has started providing services but has not completed a year of operations.

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-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

The proposed project is projected to be largely staffed by employees currently working at the Inova Mark Center. 2.8 full-time equivalent (FTE) staff will move from the center to the hospital to continue providing care with the relocated MRI scanner. The applicant estimates that it will need to hire 0.2 FTE employees. The additional staff will be recruited through MRI training

programs that Inova sponsors clinical rotations for, or through other existing recruitment pathways.

The applicant estimates that with the provision of MRI services with two scanners, there will be a profit of \$2,623,000 in the first year and \$2,658,000 in the second year (**Table 12**).

Table 12: Pro Forma Projection

	Year 1	Year 2
Gross Patient Revenue	\$ 23,447,000	\$ 24,098,000
Contractual Discounts	\$ (991,000)	\$ (1,018,000)
Charity Care	\$ (15,127,000)	\$ (15,547,000)
<i>Total Deductions</i>	\$ (16,118,000)	\$ (16,565,000)
Operating Revenue	\$ 7,329,000	\$ 7,533,000
Operating Expenses	\$ (4,706,000)	\$ (4,875,000)
Net Income	\$ 2,623,000	\$ 2,658,000

Source: COPN Request No. VA-8880

Capital costs for the proposed project are estimated at \$2,891,796 (**Table 4**). The cost of the project will be funded through accumulated reserves, and, as such, there is no financing associated with the project. The applicant does not expect an impact on the cost of providing care.

VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

The proposed project will need the additional hiring of 1.5 FTEs. The additional staff is comprised of 1 MRI technologist and 0.5 clinical technician. Inova Loudoun does not currently have vacant positions of MRI staff at the main hospital, but there is a current vacancy of 1 FTE clinical technician at the MRI scanner located at the Inova Leesburg Medical Campus. The applicant states that Inova has partnerships with MRI training programs where clinical staff have training at the hospital; X-ray technicians are also cross-trained as MRI technicians through job training at the facility. Recruitment will largely come from these affiliated programs.

The applicant estimates that with the provision of MRI services with two scanners, there will be a profit of \$5,962,000 in the first year and \$6,220,000 in the second year (**Table 13**).

Table 13: Pro Forma Projection

	Year 1	Year 2
Gross Patient Revenue	\$ 40,219,000	\$ 42,013,000
Contractual Discounts	\$ (24,928,000)	\$ (26,067,000)
Charity Care	\$ (1,415,000)	\$ (1,479,000)
<i>Total Deductions</i>	\$ (26,343,000)	\$ (27,546,000)
Operating Revenue	\$ 13,876,000	\$ 14,467,000
Operating Expenses	\$ (7,914,000)	\$ (8,247,000)
Net Income	\$ 5,962,000	\$ 6,220,000

Source: COPN Request No. VA-8882

Capital costs for the proposed project are estimated at \$4,544,203 (**Table 5**). The cost of the project will be funded through accumulated reserves, and, as such, there is no financing associated with the project. The applicant does not expect an impact on the cost of providing care.

VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

RAYUS Radiology will need to hire three additional FTE for the proposed project. This will include one staff member in the administration office and two radiologic technologists. The applicant states that the additional staff will be recruited through advertisements and “other recruiting practices” with existing RAYUS Radiology staff providing services in the initial stages.

Table 14: Pro Forma Projection

	Year 1	Year 2
Gross Patient Revenue	\$ 823,981	\$ 1,387,280
Contractual Discounts	-	-
Charity Care	\$ (41,441)	\$ (69,771)
<i>Total Deductions</i>	\$ (41,441)	\$ (69,771)
Operating Revenue	\$ 782,540	\$ 1,317,509
Operating Expenses	\$ (567,404)	\$ (663,447)
<i>Revenue after Expenses</i>	\$ 215,136	\$ 654,062
Depreciation & Amortization	\$ (479,597)	\$ (479,597)
Net Income (Before Taxes)	\$ (264,461)	\$ 174,465

Source: COPN Request No. VA-8886

The applicant estimates that with the provision of MRI services with two scanners, there will be a loss of \$264,461 in the first year and a profit of \$174,465 in the second year (**Table 14**). Without the inclusion of the depreciation and amortization costs, the facility is projected to make a profit of \$215,136 in the first year and \$654,062 which the applicant states are “a closer proxy to the MRI’s cash flow and long-term sustainability.”²⁹

Capital costs for the proposed project are estimated at \$3,028,420 (**Table 6**). The cost of the project will be funded through accumulated reserves from other RAYUS Radiology locations, and, as such, there is no financing associated with the project. The applicant does not expect impact on the cost of providing care.

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.**

²⁹ Email from Gibbs, Harrison. “COPN Request No. VA-8886 Institutional Need” 18 June 2026.

VA-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

(i) The project will not be introducing new technology; however, will be relocating and replacing an existing scanner. (ii) Services will be provided in a hospital setting. (iii) The applicant did not identify cooperative efforts to meet regional health care needs. (iv) No additional factors were deemed appropriate.

VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

(i) The project will not be introducing new technology. It is proposed to expand the existing MRI imaging services being provided. (ii) Services will be provided in a hospital setting but will include the provision of services to outpatients. (iii) The applicant did not identify cooperative efforts to meet regional health care needs. (iv) No additional factors were deemed appropriate.

VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

(i) RAYUS Radiology will not be introducing new technology. The proposed project will be the addition of a new facility, but MRI services are currently provided in the PD. (ii) Services will be provided on an outpatient basis. (iii) The applicant did not identify cooperative efforts to meet regional health care needs. (iv) No additional factors were deemed appropriate.

- 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-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

This criterion is not applicable as Inova Alexandria Landmark is not a teaching hospital.

VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

This criterion is not applicable as Inova Loudoun is not a teaching hospital.

VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

This criterion is not applicable as RAYUS Radiology is not a teaching hospital. The applicant states that there are affiliation agreements with academic programs, however, and it conducts research with community companies and institutions.

DCOPN Staff Findings and Conclusions

VA-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

Inova Health Care Services d/b/a Inova Alexandria Hospital is proposing the relocation and replacement of the existing MRI scanner from Inova Alexandria's Inova Mark Center to the new Inova Alexandria Landmark location. The Inova Mark Center is expected to close once the lease expires in 2028 due to "problems with the aged facility". The cost of relocation and replacement of the scanner at the Inova Mark Center, as well as the construction of the area, is expected to cost \$2,891,796. The hospital is currently being developed, with a plan to begin services in January 2028.

Multiple bus routes serve the location of the hospital, and the site is one mile from the Van Dorn Street Metro Station. The facility is approximately 2 miles away from the Inova Mark Center and is currently authorized for one MRI scanner. DCOPN is not aware of a reasonable alternative that would be more effective and efficient in meeting the needs of residents of the community upon the closure of the existing hospital and imaging center. Inova Alexandria Landmark has a projected capital cost of \$2,891,796, with a direct construction cost of \$252.14 per square foot which is comparable to recent authorized projects. Should the proposed project be approved, a charity care rate of 3.9% will be applied, which is consistent with the applicant's system-wide charity care. The proposed project will not add to the geographic accessibility of the PD as defined through the 30-minute drive. The proposed project is not anticipated to foster institutional competition; it will instead add to the existing majority-ownership of MRI scanners that Inova Health Care Services currently has. The project appears to be feasible.

The Health Systems Agency of Northern Virginia (HSANV) met on June 15, 2026, to discuss the proposed project and hear from community members. The Board voted eight in favor, and none opposed, to recommend approval of the application.

VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

Inova Health Care Services d/b/a Inova Loudoun Hospital (Loudoun Hospital) is proposing the addition of one MRI scanner to the hospital's main campus. The scanner will be built into an existing shell space in the existing suite.

One bus route serves the location of the hospital, with stops nearby to multiple routes around the PD. DCOPN is not aware of a reasonable alternative that would be more effective and efficient. Inova Loudoun has a projected capital cost of \$4,544,203, with a direct construction cost of \$1,279.43 per square foot which is much higher than recent authorized projects. Should the proposed project be approved, a charity care rate of 3.9% will be recommended, which is consistent with the applicant's system-wide charity care. Based on the 2024 utilization of the Inova Loudoun scanners, the facility applies for institutional need as the authorized scanner had a utilization of 146.7% of the SMFP threshold. The proposed project will not add to the geographic accessibility of the PD as defined through the 30-minute drive. The proposed project is not anticipated to foster institutional competition but will add to the existing majority-

ownership of MRI scanners that Inova Health Care Services currently has. The project appears to be feasible.

The Health Systems Agency of Northern Virginia (HSANV) met on June 15, 2026, to discuss the proposed project and hear from community members. The Board voted eight in favor, and none opposed, to recommend approval of the application.

VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

Insight is proposing the establishment of a specialized imaging facility for the provision of MRI services, with one MRI scanner. The applicant states that there is an existing patient base in the area, with patients currently traveling to the other existing locations. The proposed project is located on the border of the City of Manassas and Prince William County.

The proposed site of RAYUS Radiology is not directly served by any of the bus routes; however, there is a bus stop approximately 3.3 miles from the location. DCOPN is not aware of a reasonable alternative that would be more effective and efficient. RAYUS Radiology has a projected capital cost of \$2,879,720, with a direct construction cost of \$98.94 per square foot. This cost is comparable to recent projects and the least expensive of the proposed projects competing in this cycle. Should the proposed project be approved, a charity care rate of 5.0% will be included. RAYUS Radiology's proposed project will not add to the geographic accessibility of the PD as defined through the 30-minute drive. RAYUS Radiology's proposed project would increase the options for imaging services in the area; as the majority near the proposed location are owned by UVA Health Services. UVA Community Health wrote in opposition to the proposed project. DCOPN has concerns about the project's short-term feasibility as the proposed project is expected to have a loss of \$264,461 in the first year. The applicant states, however, that the loss is estimated after depreciation, a more accurate cash flow estimate is \$215,137.

The Health Systems Agency of Northern Virginia (HSANV) met on June 15, 2026, to discuss the proposed project and hear from community members. The Board voted five in favor and two opposed, with one abstention, to recommend approval of the application.

DCOPN Staff Recommendations

VA-8880- Inova Health Care Services d/b/a Inova Alexandria Hospital

The Division of Certificate of Public Need recommends **conditional approval** of Inova Health Care Services' Certificate of Public Need Request number VA-8880 to add one MRI scanner through relocation from the Inova Mark Center to the Inova Alexandria Hospital at the Landmark campus for the following reasons:

1. The proposal to expand MRI services in an existing medical facility is generally consistent with the standards and criteria of the State Medical Facilities Plan and the 8 Required Considerations of the Code of Virginia.
2. Capital costs for the proposed project are reasonable.
3. The proposal is an inventory neutral, maintenance of effort project.
4. There is no indication or reason to believe the project would affect any other service negatively.
5. There is no reasonable alternative, and the project is more beneficial than the status quo.
6. There is no known opposition to the project.

DCOPN's recommendation is contingent upon Inova Health Care Services' agreement to the following charity conditions:

This project shall be subject to the system-wide charity care condition applicable to Inova Health Care Services d/b/a Inova Heath System pursuant to COPN No. VA-04381 (issued April 2, 2013), as amended by the State Health Commissioner by letter dated January 4, 2016 (the Inova System-Wide Condition). Pursuant to the 2016 reconsideration, the Inova System-Wide Condition reset to 3.9% as of January 1, 2022. Provided, however, that charity care provided under the Inova System-Wide condition shall be 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.

Inova Health System 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. In addition to any right to petition the Commissioner contained in the Inova System-Wide condition, to the extent Inova Health System expects its Inova System-Wide condition as 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. or any revised percentage to materially alter the value of its charity care commitment thereunder, it may petition the Commissioner for a modification to the Inova System-Wide condition to resolve the expected discrepancy.

VA-8882- Inova Health Care Services d/b/a Inova Loudoun Hospital

The Division of Certificate of Public Need recommends **conditional approval** of Inova Health Care Services' Certificate of Public Need Request number VA-8882 to add one MRI scanner to the Inova Loudoun Hospital campus for the following reasons:

1. The proposal to expand MRI services in an existing medical facility is generally consistent with the standards and criteria of the State Medical Facilities Plan and the 8 Required Considerations of the Code of Virginia.

2. Inova Loudoun Hospital's MRI scanners are heavily utilized, and the hospital qualifies for consideration to add MRI capacity under the institutional need provision of the SMFP.
3. The proposed project is unlikely to have a significant negative impact on the utilization, costs, or charges of other providers of imaging services in PD 8.
4. There is no reasonable alternative, and the project is more beneficial than the status quo.
5. There is no known opposition to the project.

DCOPN's recommendation is contingent upon Inova Health Care Services' agreement to the following charity conditions:

This project shall be subject to the system-wide charity care condition applicable to Inova Health Care Services d/b/a Inova Health System pursuant to COPN No. VA-04381 (issued April 2, 2013), as amended by the State Health Commissioner by letter dated January 4, 2016 (the Inova System-Wide Condition). Pursuant to the 2016 reconsideration, the Inova System-Wide Condition reset to 3.9% as of January 1, 2022. Provided, however, that charity care provided under the Inova System-Wide condition shall be 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.

Inova Health System 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. In addition to any right to petition the Commissioner contained in the Inova System-Wide condition, to the extent Inova Health System expects its Inova System-Wide condition as 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. or any revised percentage to materially alter the value of its charity care commitment thereunder, it may petition the Commissioner for a modification to the Inova System-Wide condition to resolve the expected discrepancy.

VA-8886- Insight Health Corp., d/b/a RAYUS Radiology

The Division of Certificate of Public Need recommends **conditional approval** of Insight Health Corporation's Certificate of Public Need Request number VA-8886 to establish a specialized imaging center for MRI services with one MRI scanner for the following reasons:

1. The proposal to establish a specialized imaging center for MRI services is generally consistent with the standards and criteria of the State Medical Facilities Plan and the 8 Required Considerations of the Code of Virginia.
2. Existing Insight facilities serve more than 2,000 patients from the greater western Prince William County area at its Arlington, City of Fairfax, and Woodbridge services. Many

prospective patients from this area are expected to use the new service if it becomes available.

3. Capital costs for the proposed project are reasonable.

DCOPN's recommendation is contingent upon Insight Health Corp.'s agreement to the following charity conditions:

Insight Health Corp. will provide MRI 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 patients free MRI imaging services or rate reductions in MRI imaging services and facilitate the development and operation of primary care services to underserved persons in an aggregate amount equal to at least 5.0% of Insight Health Corp.'s gross patient services revenue derived from MRI imaging services. Compliance with this condition will be documented to the Division of Certificate of Public Need annually by providing audited or appropriately certified financial statements documenting compliance with the preceding requirement.