Frequently Asked Questions – MRI and PET

1. **I do not have a MRI/PET but want to initiate the service after December 1, 2025, do I need to obtain a license prior to seeing patients?**

   You cannot see patients until you have submitted an application for that service and a provisional license has been issued. Please note, this does not apply to existing MRI/PET services.

2. **I already have a Certificate of Need to have a MRI/PET service, why do I need to get a license?**

   You do need to obtain a license even if you have a Certificate of Need.
   Per TCA 68-11-1204, every MRI/PET will need to be licensed since a Certificate of Need is no longer required.

3. **I'm already licensed as a hospital, does the MRI/PET units need to be licensed also?**

   Yes. (See above)

4. **I'm already licensed as an Outpatient Diagnostic Center, does the MRI/PET units need to be licensed also?**

   Yes. (See above)

5. **Will there be a licensing fee for the MRI/PET?**

   Yes. The licensing fee will be for each licensed unit with the exception of licensed Outpatient Diagnostic Centers. Those units are included with their standard licensing fee.

6. **We have a PET/CT unit, does the CT portion of the combination need to be licensed?**

   No. CT scanners, even with a PET scanner, are not required to be licensed since they were not part of a Certificate of Need required service.

7. **Since the MRI/PET is licensed, does the unit still need to be registered with the Health Facilities Commission as part of the medical equipment registry?**

   Yes. Per TCA 68-11-1607, medical equipment is still required to be registered with the Health Facilities Commission. That process is not changing.

8. **We are planning to replace our MRI/PET unit, does the new unit need to be licensed?**

   Yes. Whenever a MRI/PET is replaced, that unit will need to be licensed.

9. **We understand the MRI/PET units need to be accredited, which organizations will be recognized?**

   MRI/PET units will need to be accredited by a CMS approved organization.

10. **We are a physician's office with a MRI/PET, does the office need to be licensed?**

    The office is not licensed. Only the MRI/PET units are required to be licensed.

11. **Does the MRI/PET license require a survey or site visit?**

    Beyond a normal survey/site visit that is conducted with a hospital or an ODC, no. The MRI/PET license will only involve a desk review of the required elements.

12. **We utilize a mobile service for our MRI/PET, does the service need to be licensed or do we get the license?**

    The "service" unit will need to be licensed. The service vendor will not be licensed.

13. **We share a MRI with another providers, who should obtain the license for the unit?**

    Each provider using the unit will need to obtain a license. The license is for the service.

14. What is the process of obtaining a MRI/PET license?

An application will need to be completed and emailed at hfc.service@tn.gov after December 1, 2025. Once the application is received and processed, an invoice will be mailed to the provided billing address. The invoice will have a due date included for payment to be made by. A wall certificate will be created and mailed to the CEO/Administrator listed on the application.

15. Who should sign the application?

Other than the CEO or Administrator of the facility/organization, anyone who has the authority to sign for the facility/organization.

16. If the license does not require a site review or survey, what is the license requirement?

The main requirement will be that the MRI/PET unit(s) will need to be accredited by a CMS approved accreditation organization that accredits imaging services.

17. We are accredited by an organization that certifies all services within the licensed entity, does each MRI/PET still need to be accredited?

If you are accredited by The Joint Commission or DNV, those accreditations cover all services within the licensed entity. Thus, MRI/PET units are accredited through those organizations. However, if you pursue additional accreditation, those are accepted.

18. We currently are not accredited, what is the time period to become accredited.

You have two years to become accredited from the time you acquire the unit or from December 1, 2025, whichever is the most recent.

19. We have a Certificate of Need with limitations (i.e. adult only, patients of practice only, etc.), are these limitations still in place?

After December 1, 2025, any limitations listed on a Certificate of Need for the MRI/PET service will no longer exist. For example: If you were limited to adult patients only, you will be able to see any age of patient. However, in regards to a MRI, procedures performed will only be within the allowable capabilities of the unit.

20. We have satellite campuses, are the satellites to submit an application separately from the host?

Each satellite campus must submit a separate application for their services located on the satellite's campus. The host location will submit their application separate from the satellites.