

**ATRIUM HEALTH COMMENTS ON PROPOSED POLICY GEN-5
ACCESS TO CULTURALLY COMPETENT HEALTHCARE
IN THE 2025 STATE MEDICAL FACILITIES PLAN**

COMMENTER

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Atrium Health (Atrium) appreciates the opportunity to comment on the proposed policy GEN-5 to assess culturally competent healthcare of CON applications in the 2025 State Medical Facilities Plan (SMFP). Based on its detailed review of the proposed policy, Atrium requests the State Health Coordinating Council (SHCC) allow additional opportunities for consideration and review by provider community and other interested parties beyond this initial two-week comment period. There are potential unintended consequences of the proposed policy that could result in an inadequate review of CON applications.

As the Agency pointed out in the discussion section of the document, there is an inconsistency in the data submitted by providers of different services and equipment that could be helpful in evaluating an applicant's ability to provide culturally competent services.

The HIDI data reported by hospitals and ASCs do include some fields that may be useful for this effort:

- Patient Age (in years)
- Patient sex
- Patient Race
- Patient Ethnicity
- Patient billing zip code (5 digit)
- Patient payor (high level info only, but self-pay and Medicaid can both be parsed out)

While these items are fairly reliable from most of the reporting facilities, there are definitely some instances where these fields are not fully reported (generally, those tend to be race and ethnicity data). With some enhanced collection efforts, the data could become better in the future.

For other data reporting mechanisms like the License Renewal Applications and Equipment Registration and Inventory forms, new data fields could be added that would provide more information to assess delivery of culturally competent care. The selection of new data fields and assessing the potential burden in gathering and reporting the data will require further discussion between DHSR and the provider community.

In summary, Atrium agrees with the intent of the proposed policy. Atrium would like to recommend the SHCC not take immediate action on the petition to allow for additional discussion and feedback from the provider community to reduce the likelihood of potential negative unintended consequences of the petition. Atrium appreciates the opportunity to provide these comments.