TOPCATS Division 2321 West Morehead Street Charlotte, NC 28208 (P) 704/335-0151 Ext. 255 (F) 866-480-7831

$DaVita \ \ \text{``he/she that gives life''}$

William L. Hyland Director of Healthcare Planning

October 29, 2010

Mr. Craig Smith, Chief Certificate of Need Section Division of Health Service Regulation North Carolina Department of Health and Human Services 2704 Mail Service Center Raleigh, NC 27699-2704

RE: Project #F-8590-10/Renal Advantage Incorporated Care Centers of North Carolina II, LLC d/b/a RAI Care Centers - Concord FID #100967

Dear Mr. Smith:

The following are written public comments about the project referenced above:

The applicant presents a Certificate of Need application that cannot be approved due to the failure to comply with several of the review criteria and rules.

In Section I.13(b). on page 13 of RAI-Concord application, the following statement is made, "Because RAI has been successful in operating its ESRD facilities in North Carolina, RAI has had the privilege of expanding the number of dialysis stations at three of the four of its North Carolina facilities. In the case of one of its North Carolina ESRD facilities, RAI has expanded the facility by nearly 50% to meet growing demand for its services." That statement only tells part of the story about the development of the RAI programs in North Carolina since they acquired the four facilities at the end of 2005.

Below is a chart that outlines the station and patient growth from January 1, 2006 to December 31, 2009, the four year period based on information contained in the July 2006 Semiannual Dialysis Report and the July 2010 Semiannual Dialysis Report.

12.31.2005	Warsaw	Latrobe	University	Goldsboro	Totals
In-Center Census	50	58	77	25	210

# of Stations	14	24	24	11	73
Utilization Rate	89%	60%	80%	57%	72%

12.31.2009	Warsaw	Latrobe	University	Goldsboro	Totals
In-Center Census	34	58	118	28	238
# of Stations	16	24	34	16	90
Utilization Rate	53%	60%	87%	44%	66%

2005-2009	Warsaw	Latrobe	University	Goldsboro	Totals
Station Increase #	2	0	10	5	17
Station Increase %	14%	0%	42%	45%	23%
In-Center Census Increase	-16	0	41	3	28
In-Center Census % Increase	-32%	0%	53%	12%	13%

This data indicates that RAI has grown their station census by 17 stations and has had an in-center patient census growth of only 27 patients during the four-year period or 13%. I would not rate as successful the performance of three of the four facilities RAI operates in North Carolina. The Warsaw, Latrobe and Goldsboro facilities have had a net loss of 13 in-center patients, but have added seven stations in those three facilities.

Section II of the application requires the applicant to provide information concerning the criteria and standards. One of the areas identified is identified in the chart on page 15 under II.1.(b)(6) Projected patient origin with assumptions. Providing a methodology on how you will secure your patient base is the most important aspect of a dialysis application. The applicant states in response to this request, "See Section III.7 on page 41.

In Section III.7 on page 41 the applicant offers this information on patient origin with assumptions:

- The applicant provides a chart identified as "Cabarrus County Total Dialysis Patients Historical and Projected"
- The applicant provides a second chart identified as "Cabarrus County Total Dialysis Patients Dialysized (spelling) in Cabarrus County Historical and Projected" (note: the information in this chart is incorrect)
- The applicant makes the false statement, "As the previous tables illustrated, nearly 50% of Cabarrus County dialysis patients receive in-center dialysis treatments outside of Cabarrus County"
- The applicant provides a third chart identified as, "RAI-Concord In-Center Dialysis Patients Projected"
- The applicant projects a population 65+ in year 1-2011 of 20,752 and in year 2-2012 of 21,608
- The applicant projects a Home Dialysis Patients of 7 in Year 1-2011 and 7 in year 2-2012
- The applicant projects In-Center Dialysis Patients of 75 in Year 1-2011 and 78 in Year 2-2012.

• An additional chart indicates what county the patients will come form with the percentage of patients from each county

Based on the information provided in III.7 one could deduct that operating year 1 is 2011 and operating year 2 is 2012. That means the applicant plans to provide services prior to the decision on their application and prior to a site being purchased and developed.

The applicant provides no assumptions as required in the Certificate of Need Statute. Therefore the whole CON application to develop a new, 23-station in-center dialysis facility to be known as RAI-Concord is fatally flawed and cannot be approved. We have been instructed by the former CON Section Chief and current Section Chief for over eleven years that need cannot be conditioned. You either provide reasonable assumptions and methodology or the CON application will be denied.

In Section II.10. on page 18 of RAI-Concord application, the following statement is made, "RAI-Concord will primarily treat patients from within its service area, Cabarrus County, but will not refuse in-center dialysis services based on a patient's home address, whether or not their home address is 30 miles or more from RAI-Concord. RAI is aware of a number of ESRD patients who reside in Cabarrus County who travel outside the county for their dialysis services. Included in this application are letters of support from seven patients from north Mecklenburg County and Cabarrus County who would benefit from a RAI dialysis center in Concord.

Please refer to Exhibit 5 for these patient letters."

Seven form letters signed by patients are located in Exhibit 5 of the application. All seven of the letters state the following, "If I require dialysis services to treat my kidney disease, I will want to use this dialysis center so that I would not have to travel for dialysis care." All seven of the letters contain the address and zip code of the patient. Three of the patients live in Huntersville in Mecklenburg County, one patient lives in Charlotte in Mecklenburg County, one patient lives in Concord in Cabarrus County and two patients live in Harrisburg in Cabarrus County. None of the patients live in the zip code of the proposed facility.

I have determined the distance from the homes of the identified patients to the proposed RAI-Concord facility and the RAI-University facility. In the cases of the patients living in Cabarrus County I have also determined the distance between the home address and/or the Total Renal Care of North Carolina Harrisburg and Copperfield facilities. See the chart below for the distances:

	Mileage	Mileage	Mileage	Mileage
Patient Name and				
Address	RAI-Concord	RAI-Glenwater	TRC-Harrisburg	TRC-Copperfield

Mildred L. Brown	14.1	11	N/A	N/A
407 Gibson Park				
Drive.				
Huntersville, NC 28078				
20076				
Alberto Centurion	14.3	17	11	10.5
1031 Braxton Drive				
Concord, NC 28025				
Donald Devine	18.5	15.9	N/A	N/A
14836 Dunbeth Drive				
Huntersville, NC				
28078				
		T		
Stephen Dolniak	17.7	11.2	N/A	N/A
Cimmaron Road				
(McCoy Rd.) Huntersville, NC				
Huntersville, NC				
Betty Fletcher	16.9	6.3	N/A	N/A
5418 Twin Lane		·		
Charlotte, NC 28269				
Danny Richie	11.4	8	4.4	N/A
3986 Carl Parmer				
Drive				
Harrisburg, NC				
28075				
Betty Robbins	11.4	7.3	4.7	N/A
221 Autumn Lane	11.4	1.0 .	T.1	TW/A
Harrisburg, NC				
28075				

Six of the seven patients who submitted letters of support live closer to the RAI-Glenwater (University) in Mecklenburg facility than to the proposed RAI-Concord location. The other patient lives closer to the both the TRC Harrisburg and TRC Copperfield facilities than to the proposed RAI-Concord location. See **Exhibit 1** for copies of the Bing Maps.

None of the seven letters indicates that the patient would transfer from the location where they are currently receiving their dialysis treatments. None of the letters indicate that the location of the proposed RAI-Concord facility is closer to their homes or more convenient than the facility where they are currently receiving their dialysis treatments. Therefore, none of these patients can realistically used in any methodology that includes their transfer from their current facility to the proposed RAI-Concord facility.

In Section II.12.b. on page 19 of RAI-Concord application, the following statement is made, "RAI-Concord will operate twelve (12) shifts per week offering at least two shifts on Monday, Wednesday, and Friday, and one shift on Tuesday, Thursday, and Saturday." In this statement RAI-Concord will be offering only three (3) shifts a week, not twelve (12) shifts a week.

In Section III.1. on page 30 of RAI-Concord application, the applicant presents a chart with the heading

"Cabarrus County

Total Dialysis Patients Dialysized (spelling error) in Cabarrus County Historical and Projected"

	Historical*				
	12/2005	12/2006	12/2007	12/2008	12/2009
Dialysis	45	47	53	55	109
% Change		-4.4%	+12.8%	-3.8%	+98.2%

Source: *Southeastern Kidney Council

The data in the chart above in incorrect. The data in the chart below is correct. The overall growth rate of the in-center patient population in the Cabarrus County facilities from December 2005 through December 2009 was 13.5%, not the 142% presented by the applicant.

	Historical*					
	12/2005	12/2006	12/2007	12/2008	12/2009	
Dialysis	96	91	104	105	109	
% Change		-5.2%	+14.3%	-1.0%	+3.8%	

Source: *Southeastern Kidney Council

This chart only includes the in-center hemodialysis patient census. The chart located on page 30 with the heading

"Cabarrus County

Total Dialysis Patients

Historical and Projected".

includes all patients. That data can be found in the July 2010 Semiannual Dialysis Report in Table B under Cabarrus County.

In Section III.1. on page 31 of RAI-Concord application, the following statement is made, "As the previous tables illustrated, nearly 50% of Cabarrus County dialysis patients receive in-center dialysis treatments outside of Cabarrus County". That information is incorrect since one of the tables on page 30 cites in-center patient census and the other table cites total dialysis population in the county. The applicant did not deduct the 30.4 home-trained patients before calculating their percentage.

In Section III.7. on page 41 of RAI-Concord application, the applicant presents the same documentation as cited on pages 30-31 above.

As cited in **Section III.7. on page 41**, the applicant is required to provide assumptions for projecting the number of patients in the second operating year. On **page 42** the applicant provides the number of 7 Home Dialysis Patients and 78 In-Center Dialysis Patients. They also indicate the number of Mecklenburg County and Cabarrus County patients they project dialyzing in the second operating year. However, the applicant fails to provide any assumptions for projecting the number of patients in the second operating year as required.

In Section V.1. on page 46 of RAI-Concord application, the applicant provides documentation in their Exhibit 9 that supports the information contained on page 46. However, the letter from Carolinas Medical Center NorthEast cites a "Hospital Services Affiliation Agreement – CON Application for Dialysis Stations, Renal Advantage/Cabarrus County" which is not the name of the proposed RAI facility. The body of the letter states, "Specifically, Carolinas Medical Center-NorthEast can provide the following services to Renal Advantage patients, which are also available to all service area residents:...". There is not documentation in the letter or any other document signed by an official of Carolinas Medical Center-NorthEast that indicates that they will enter into a Patient Transfer Agreement with the applicant.

The letters from Carolinas Medical Center-University, Carolinas Medical Center and Presbyterian Healthcare contain the same language as the letter from Carolinas Medical Center-NorthEast with no indication that these facilities will enter into a Patient Transfer Agreement with the applicant.

The Laboratory Services Agreement cites that the proposal is entered into "...by and between RenalLab Inc., wholly owned subsidiary of Renal Advantage, Inc. and a Delaware corporation ("RenalLab") and RAI Care Centers of North Carolina II, LLC dba RAI-Trinity Church-Concord (the "Facility"). The name of the facility as cited by the applicant on page 2 of the application in Section I.6. Proposed/Existing Name of the Facility: RAI Care Centers — Concord. The applicant fails to provide a Laboratory Services Agreement between the lab and the proposed facility.

In Section V.4(a) on page 49 of RAI-Concord application, the following statement is made, "Please refer to Exhibit 12 for the physician letters of support... The applicant offers 18 physician letters of support from physicians who practice in Mecklenburg County. None of the physicians are Nephrologists. One of the physicians indicates that her office is located in Concord. However, the web page for University Medical Associates indicates the physician is located in Huntersville in Mecklenburg County. See Exhibit 2 for a copy of the web page.

In Section V.5(a) on page 50 of RAI-Concord application, the following statement is made, RAI-NC has sent correspondence to develop cooperative working relationships with other local healthcare and social service providers, including long-term care facilities, the local health department, and the Cabarrus County Department of Social Services." The applicant includes 12 letters written by Eric Enderle, Vice President of Development in Brentwood, Tennessee, informing agencies that they are "proposing to

develop a renal dialysis facility in Cabarrus County". These letters were all written on September 10, 2010. There is no evidence that the applicant made an attempt to set up meetings with these agencies to discuss the project or even to call them and ask for support.

In Section V.5(b) on page 50 of RAI-Concord application, the following is required, "Provide any documented evidence of specific support for your proposal from other groups/individuals who could affect the project's success, i.e., healthcare providers, health-related agencies, and social service providers. Note, letters should reflect the extent to which the organization/person is familiar with the components of the project."

The applicant states, "Please refer to Exhibits 12 and 14 for letters of support." The letters in Exhibit 12 are letters of support from physicians in Mecklenburg County. None of the physicians is identified as a Nephrologist. The physician letters are a support for Dr. Doman and do not contain any information that the physicians indicate that the are familiar with the components of the project. The letters are all the same. This suggests a form letter written by the applicant.

The letters in Exhibit 14 are the letters written to healthcare providers by the RAI Vice President of Development. There is no evidence that any of these healthcare providers have been contacted. Therefore, they cannot be familiar with the components of the project.

In Section V.6(a) on page 50 of RAI-Concord application, the following is required, "Describe the efforts made by the applicant to involve the community in the planning and development of the facility's services." The applicant responds, "RAI-NC has involved patients in this proposed project through the cooperation of local nephrologists, since they are the individuals who will most be affected by the development of RAI-Concord. Several of these patients have signed letters of intent to consider moving to the RAI-Concord facility when it becomes operational. Please refer to Exhibit 5 for these patient letters."

There is no evidence in the application that any local nephrologists have played any role in involving patients in the development of the project proposal. The patient letters referred to in Exhibit 5 are form letters signed by seven patients. Six of those patients live closer to the RAI-Glenwater (University) facility located in Mecklenburg County than to the proposed RAI-Concord facility. Four of the seven patients live in Mecklenburg County. The signed patient letters state, "I will want to use this dialysis center so that I would not have to travel for dialysis care." The statement makes no sense. All patients travel somewhere for dialysis unless they are in a home-trained program.

In Section VI.1(c) on page 50 of RAI-Concord application, the applicant must "indicate the type of patient payment that will be received for the proposed service". The applicant indicates that almost 20% of the patients will have commercial insurance or be self pay. The applicant has overstated the percentage of patients that fall into these categories.

In Section VI.1(e) on page 53 of RAI-Concord application, the applicant must define "medically indigent". RAI states, "RAI provide \$24.3 in charity care/write-offs". The statement makes no sense. The applicant indicates in the chart in VI.1(c) that they will not provide any services to indigent patients.

In Section VI.5(b) on page 54 of RAI-Concord application, the applicant must "Identify the specific facilities or agencies from whom you expect to receive referrals and/or transfers (e.g., hospitals, home health agencies, dialysis facilities, etc.)". The applicant responds, "The services at RAI-Concord will be accessed through physician referral; however RAI-Concord will also accept patients referred by nursing facilities and/or self-referring patients with the approval of the Medical Director". The applicant does not provide the information requested.

In Section VII.6. on page 58 of the RAI-Concord application, the applicant is asked to "Describe the back-up arrangements for each nephrologist to be affiliated with the proposed facility". The applicant states in response, "In the absence of Dr. Kathleen A. Doman, the RAI-Concord Medical Director and facility nephrologist, local nephrologists will be contracted with to provide back-up medical coverage to RAI-Concord patients". There is no documentation indicating that local Nephrologists have been contacted by RAI-Concord to provide these services.

In Section VII.6. on page 58 of the RAI-Concord application, the applicant is asked to "provide the number of direct care staff for each shift offered in the facility. (Explain any anticipated changes to the shift schedule)". The applicant states in response, "RAI-Concord will operate twelve (12) shifts per week offering at least two shifts on Monday, Wednesday, and Friday and one shift on Tuesday, Thursday, and Saturday. The following staffing pattern shows twelve shifts; three shifts on Monday, Wednesday, and Friday; and one shift on Tuesday, Thursday, and Saturday. The shift pattern may change due to patient preference; however, RAI-Concord will always offer 12 weekly shifts."

The applicant contradicts itself by stating that it will provide 12 shifts a week, but will offer at least two shifts on MWF and one shift on TTS. By their count, this is only 9 shifts. The applicant indicates that they will have only one RN on duty on the floor while 23 dialysis stations are operational. They also indicate that the RN will be a direct care staff. The Licensure and Certification Section will not certify the facility with that type of staffing. The applicant proposes to cut corners on staffing.

The applicant presents a staffing pattern of patient care technicians that can only treat a maximum of 20 patients on the 1st shift on MWF, 2nd shift MWF, 1st shift TTS and only 8 patients on 3rd shift on MWF. This totals 68 in-center patients or a utilization rate of 74% or 3.0 patients per station.

In Section IX.1(c). on page 65 of the RAI-Concord application, the applicant is asked to "Identify the projected employment date of all staff that will be responsible for and/or will participate in start-up facility". The applicant states, "Facility staff will be hired two

weeks before the initiation of services at RAI-Concord". The Licensure and Certification Section will not certify a facility that operates with employees who have been hired for only two weeks. It takes about three months of training for a staff member to have any competency level.

In Section I.10.(a) on page 4 of the RAI-Concord application, the applicant is required to "Identify the owner of the building in which the proposed dialysis stations will be located". The applicant states, "The owner of the building will be Oman-Gibson Associates". Oman-Gibson Associates is a developer of healthcare facilities. The firm is located in Nashville, TN. The applicant states who the owner "will" be. This means that the Oman-Gibson does not presently own the property. The applicant also states that, "Oman-Gibson Associates has no role in the development of the 23 dialysis stations or in the operation of RAI-Concord." This statement indicates that no entity of RAI owns the proposed site at 1937 Trinity Church Road in Concord.

In Section XI.2.(i) on page 79 of the RAI-Concord application states, "If the site has not been purchased or optioned, provide a letter from the realtor or owner of the site that documents that the site is available for acquisition. The applicant responds, "Not applicable. RAI-Concord will lease the building." There is no documentation in the application that indicates that the site at 1937 Trinity Church Road is available for purchase or has been optioned. There is a letter in Exhibit 21 indicating that Oman-Gibson Associates intends to lease out the site. However, there is no documentation that the site is currently owned by Oman-Gibson or under option by Oman-Gibson. Even if they did own the property or have it under option, the fact that Oman-Gibson has no ownership relationship with any RAI entity still requires RAI-Concord to have documentation from the owner of the property or a real estate firm that the property is available for purchase. That documentation does not exist in this application.

In Section XI.2.(j) on page 79 of the RAI-Concord application states, "If the site has not been purchased, is the applicant willing to diligently pursue acquisition of the site if approval is granted for the certificate of need?" The applicant responds by checking the "No" box and states, "RAI-Concord will lease the building and will not pursue the acquisition of the site". The applicant failed to indicate that the developer will diligently pursue the acquisition of the site.

In Section XI.3. on page 80 of the RAI-Concord application states, "Secondary Site: If the primary site has not been purchased or optioned, please identify a secondary site, as well". The applicant responds, "Not applicable. RAI and RAI-NC do not propose a secondary site". The applicant is required to identify a second site of the applicant does not own or have under option the primary site.

The Bio-Medical Applications of North Carolina, Inc. d/b/a FMC Dialysis Services of McDowell County d/b/a Fresenius Medical Care of McDowell County CON application to develop a new nine-station facility in Marion in McDowell County (Project I.D. #C-6994-04) was found to be nonconforming to 10A NCAC 14C.2202 Information Required of Applicant (b)(5) which states, "The location of the site on which the services are to be

operated. If such site is neither owned by nor under option to the applicant, the applicant must provide a written commitment to diligently pursue acquiring the site if and when the approval is granted, must specify a secondary site on which the services could be operated should acquisition efforts relative to the primary site ultimately fail, and must demonstrate that the primary and secondary sites are available for acquisition."

BMA McDowell was found nonconforming with this rule as stated in the Required State Agency Findings, "BMA McDowell proposed to locate the facility at a site at 100 Spaulding Road in Marion and provides information in Section XI of the application about the proposed site. In Exhibit 12, the applicant provides a copy of a resolution from the McDowell County Board of Commissioners regarding the intent of McDowell County to lease this space at \$4 per square foot to the dialysis provider who obtains a certificate of need for the dialysis facility. The applicant provides a sample lease agreement in Exhibit 23. However, the applicant failed to identify a secondary site and the primary site is neither owned or under option to the applicant. Therefore, the applicant does not conform with this criterion."

Therefore, the RAI-Concord application does conform to this criterion.

In Section XI.6.(a) on page 82 of the RAI-Concord application states that the applicant "Provide a line drawing of the floor plan of the total facility following the completing of the project to include the location of the dialysis stations and the square footage of each station". The applicant responds, "Square footage calculation: (145.6 square feet)/23 stations = 3.371 square feet per dialysis station."

In Section XII. on page 89 of the RAI-Concord application the applicant indicates that the completion of preliminary drawings will be completed one day after the receipt of the CON. They also state that the contract will be awarded 75 days later with construction being completed 150 days later. However, the applicant failed to take into consideration the time it will take the identified developer/lessor to purchase the property and negotiate a lease with RAI-Concord. They also failed to take into consideration the amount of time needed to work with the City of Concord in securing the necessary building permits. There is not way that land can be purchased, a lease negotiated and signed, permits secured, construction of the shell completed, the upfit of the facility, the pre certification audit and the life safety audit and certification survey to be completed in 9 months. The earliest this facility could be completed and certified would be July 1, 2012.

It will be apparent to the project analyst assigned to review this application that it is filled with inconsistencies and failures to adequately address many of the Certificate of Need Statute Criterion and Rules. Therefore, this Certificate of Need application is fatally flawed and should be denied.

Sincerely,

William L. Hyland Director of Healthcare Planning

Attachments

Bing	Maps



407 Gibson Park Dr, Huntersville, NC 28078-4222

(Directions to approximate location.)



9030 Glenwater Dr, Charlotte, NC 28262-8563

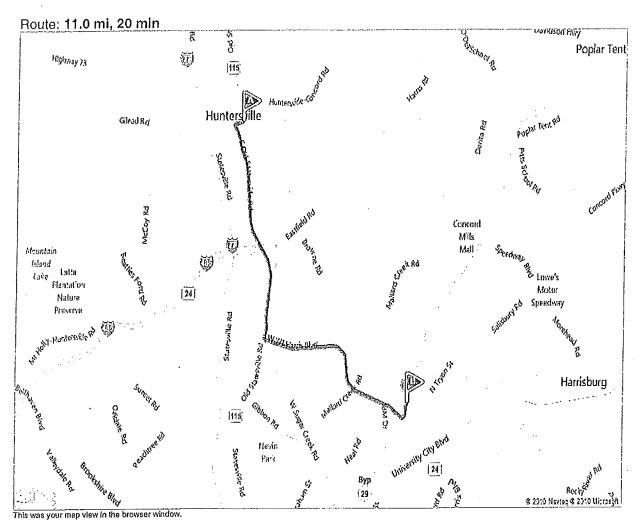
Houte: 11.0 mi, 20 min

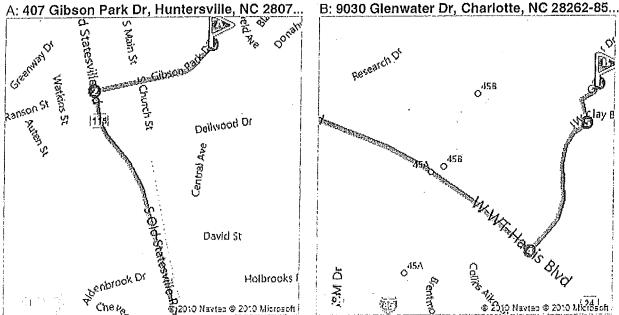
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407 Gibson Park Dr, Huntersville, NC 28078-4222	A–B: 11.0 mi 20 min
Depart Gibson Park Dr toward Garden District Row	0.3 mi
2. Turn left onto SR-115 / S Old Statesville Rd	5.2 mi
3. Turn left onto SR-24 East / W WT Harris Blvd Pass JACK IN THE BOX on the left in 1.8 ml	4.9 ml
4. Turn left onto JW Clay Blvd TACO BELL on the corner	0.4 mi
5. Turn left onto Doug Mayes PI, and then immediately turn right onto Glenwater Dr	0.1 mi
6. Arrive at 9030 Glenwater Dr, Charlotte, NC 28262-8563 on the right The last intersection is Doug Mayes Pl If you reach Emerald Cove Rd, you've gone too far	0.0 mi

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407 Gibson Park Dr, Huntersville, NC 28078-



1937 Trinity Church Rd, Concord, NC 28027-

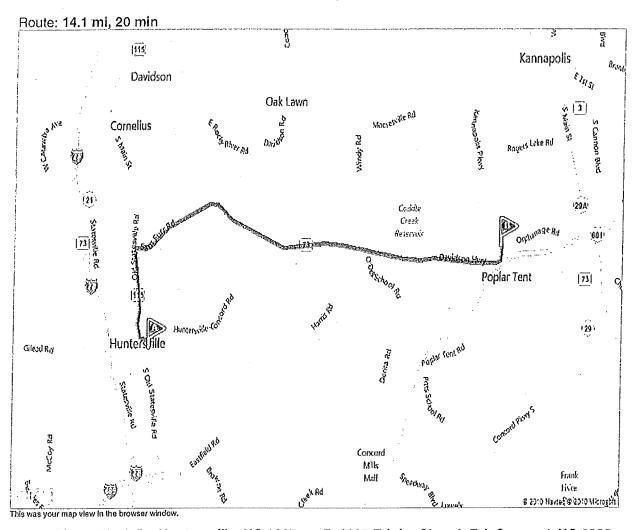
Route: 14.1 mi, 20 min

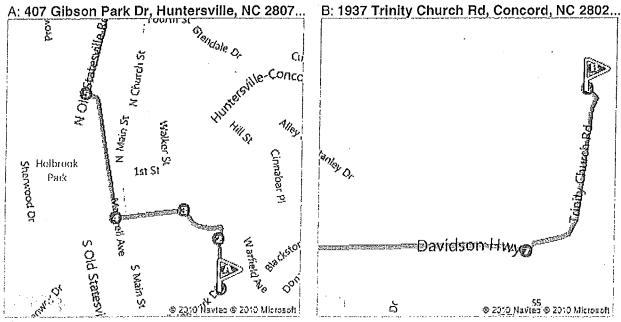
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	407 Gibson Park Dr, Huntersville, NC 28078-4222	A-B: 14.1 mi 20 min
	Depart Gibson Dr toward Mallory Baches Ln	0.1 mi
Q	2. Bear right and then turn left onto Warfield Ave	0.2 mi
4	3. Turn left onto Huntersville-Concord Rd	0.2 mi
	4. Turn right onto Maxwell Ave	0.3 mi
⇔	5. Turn right onto SR-115 / N Old Statesville Rd	1.8 mi
➾	6. Turn right onto SR-73 / Sam Furr Rd	11.0 mi 13 min
图	7. Bear left onto Trinity Church Rd 76/CIRCLE K on the corner	0.5 mi
	8. Arrive at 1937 Trinity Church Rd, Concord, NC 28027-8418 on the left The last intersection is Orphanage Rd If you reach NW Cabarrus Dr, you've gone too far	0.0 ml

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1031 Braxton Dr, Concord, NC 28025-6833 1937 Trinity Church Rd, Concord, NC 28027-8418

(Directions to approximate location.)

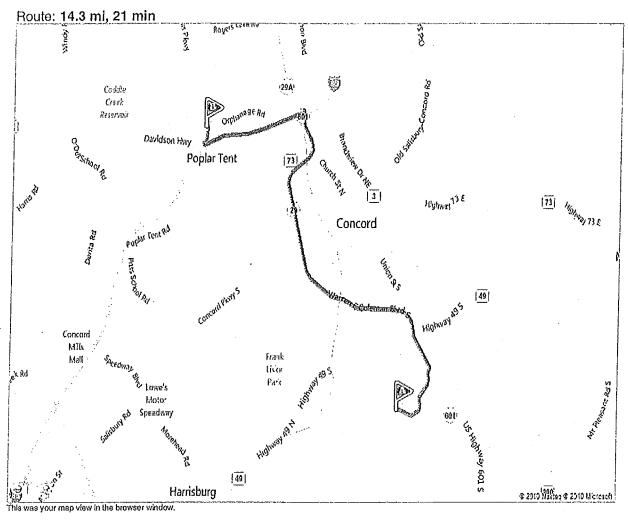
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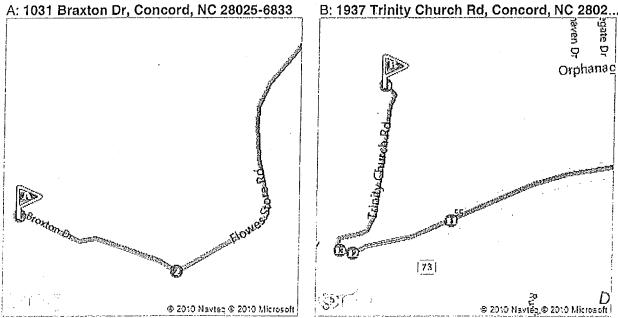


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	E 71	031 Braxton Dr, Concord, NC 28025-6833	A-B: 14.3 mi 21 min
	1.	Depart Broxton Dr toward Daffodil Ln	0.4 mi
4	2,	Turn left onto Flowes Store Rd	1.4 mi
4	3.	Turn left onto US-601 / US Highway 601 S	0.9 mi
601	4.	Road name changes to US-601 / US-601 Byp / Highway 601 Byp S / US-601 S / US-601-Byp S	0,2 mi
Î	5.	Keep straight onto US-601 Byp / Warren C Coleman Blvd S	4.0 mi
7	6.	Keep right toward US-29 North / US-601 Byp North / Warren C Coleman Blvd N	0.1 ml
7	7.	Bear right onto US-29 North / US-601 Byp North / Warren C Coleman Blvd N	2.8 mi
Ŋ	8.	Bear left onto US-29 North / US-601 North / Concord Pkwy N	0.6 mi
Î	9.	Keep straight onto US-29 North / Concord Pkwy N	0.2 mi
(1)	10.	Take ramp right for I-85 South toward Charlotte	2.9 mi
	11.	At exit 55, take ramp right for SR-73 toward Huntersville	0.3 mi
Ą	12.	Bear right onto SR-73 / Davidson Hwy	0.0 mi
Q	13.	Turn back on Trinity Church Rd	0.5 mi
	T	rrive at 1937 Trinity Church Rd, Concord, NC 28027-8418 on the left the last intersection is Orphanage Rd	
	1f	you reach NW Cabarrus Dr, you've gone too far	0.0 mi

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Bing	Maj	SC



1031 Braxton Dr, Concord, NC 28025-6833 (Directions to approximate location.)



9030 Glenwater Dr, Charlotte, NC 28262-8563 (Directions to approximate location.)

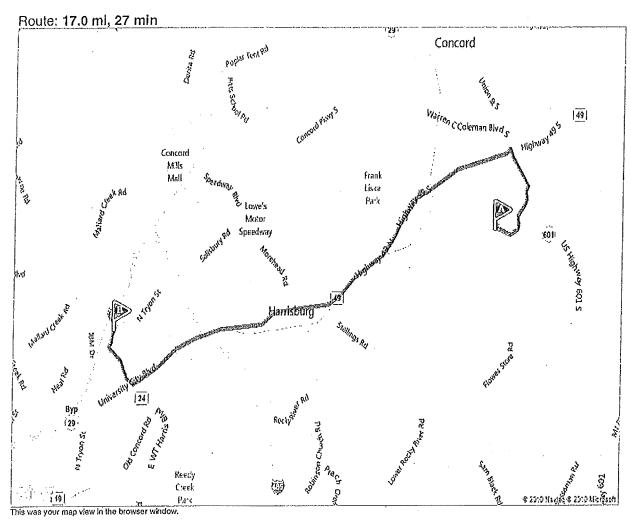
Route: 17.0 mi, 27 min

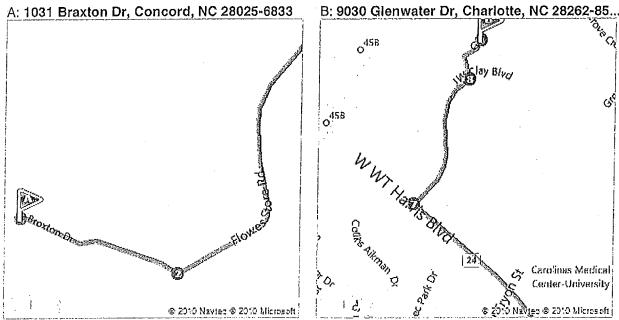
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	<u> </u>	1031 Braxton Dr, Concord, NC 28025-6833	A-B: 17.0 mi 27 min
	1.	Depart Broxton Dr toward Daffodil Ln	0.4 mi
(=)	2.	Turn left onto Flowes Store Rd	1,4 mi
4	3.	Turn left onto US-601 / US Highway 601 S	0.9 ml
601	4.	Road name changes to US-601 / US-601 Byp / Highway 601 Byp S / US-601 S / US-601-Byp S	0.2 mi
49	5.	Take ramp left and follow signs for SR-49 South / Highway 49 S Pass CITGO in 6.6 mi	12.5 mi 18 min
24	6.	Take ramp right and follow signs for SR-24 West / E WT Harris Blvd	1.2 mi
\Rightarrow	7.	Turn right onto JW Clay Blvd TACO BELL on the corner	0.4 mi
E ₃	8.	Turn left onto Doug Mayes PI, and then immediately turn right onto Glenwater Dr	0.1 mi
	T	rrive at 9030 Glenwater Dr, Charlotte, NC 28262-8563 on the right he last intersection is Doug Mayes Pl	
	IT	you reach Emerald Cove Rd, you've gone too far	0.0 mi

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Bing	Maps
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1031 Braxton Dr, Concord, NC 28025-6833 (Directions to approximate location.)



3310 Perry St, Concord, NC 28027-3901

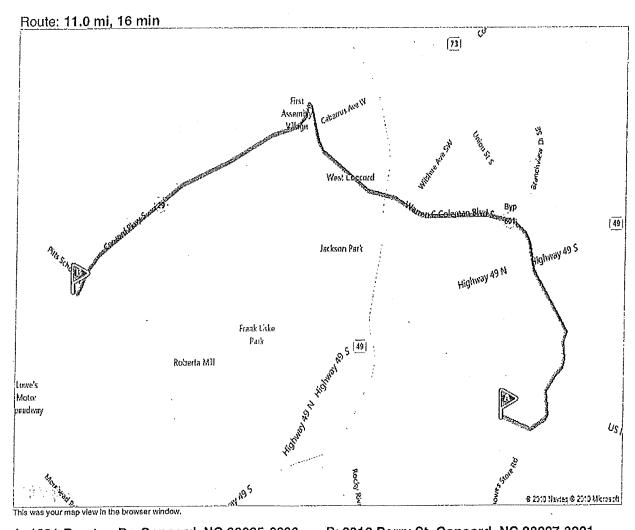
Houte: 11.0 ml, 16 min

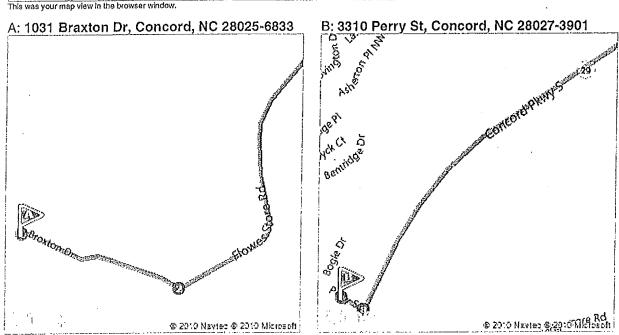
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FREE! Use Bing 411 to find movies, businesses & more: 800-BING-411

	e)	1031 Braxton Dr, Concord, NC 28025-6833	A-B; 11.0 mi 16 min
	1.	Depart Broxton Dr toward Daffodil Ln	0.4 mi
4	2.	Turn left onto Flowes Store Rd	1.4 mi
4	3.	Turn left onto US-601 / US Highway 601 S	0.9 ml
(601)	4.	Road name changes to US-601 / US-601 Byp / Highway 601 Byp S / US-601 S / US-601-Byp S	0,2 mi
介	5.	Keep straight onto US-601 Byp / Warren C Coleman Blvd S	4.0 mi
图	6.	Keep left to stay on US-601 Byp North / Warren C Coleman Blvd N	0.0 mi
(7.	Turn left onto US-29 South / Concord Pkwy S Pass JACK IN THE BOX on the left in 0.9 mi	4.1 mi
\Rightarrow	8.	Turn right onto Perry St	0.1 mi
	7	o. Arrive at 3310 Perry St, Concord, NC 28027-3901 on the left The last intersection is US-29 South / Concord Pkwy S If you reach Bogle Dr, you've gone too far	0.0 mi

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Bing Maps



1031 Braxton Dr, Concord, NC 28025-6833 (Directions to approximate location.)



1030 Vinehaven Dr NE, Concord, NC 28025-2438

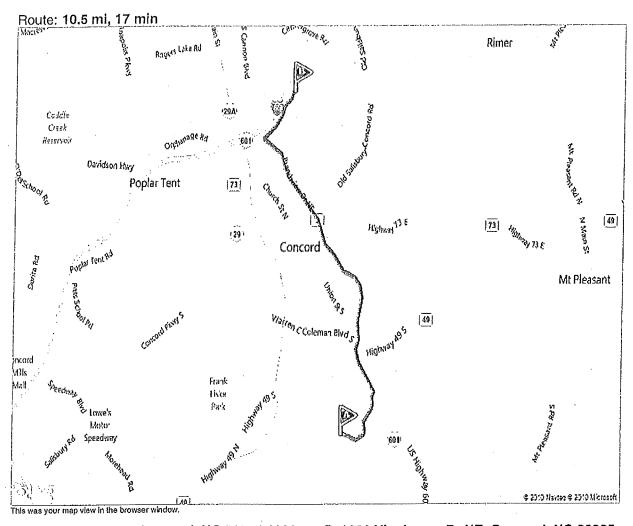
Route: 10.5 mi, 17 min

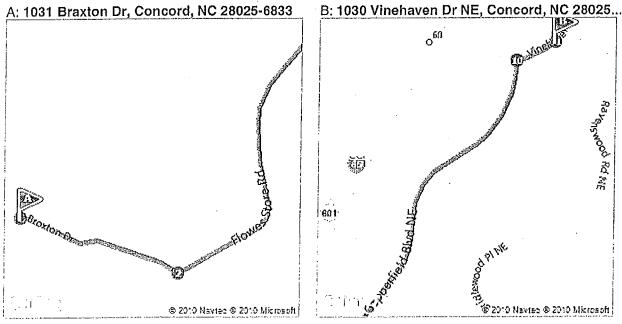
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H FREE! Use Bing 411 to find movies, 🖤 businesses & more: 800-BING-411

No.	₃ 1031 Braxton Dr, Concord, NC 28025-6833	A–B: 10.5 mi 17 min
	Depart Broxton Dr toward Daffodil Ln	0.4 mi
4	2. Turn left onto Flowes Store Rd	1.4 mi
4	3. Turn left onto US-601 / US Highway 601 S	0.9 mi
(601)	 Road name changes to US-601 / US-601 Byp / Highway 601 Byp S / US-601 S / US-601-Byp S 	0.2 mi
Î	5. Keep straight onto US-601 Byp / Warren C Coleman Blvd S	0.1 mi
	6. Turn right onto US-601 Bus / Union St S	0.6 mi
7	7. Bear right onto Branchview Dr SE	2.3 mi
介	8. Keep straight onto SR-3 / Branchview Dr SE	3,1 mi
=>	9. Turn right onto Copperfield Blvd NE	1,4 mi
➡>	10. Turn right onto Vinehaven Dr NE EXXON on the corner	0.1 mi
	11. Arrive at 1030 Vinehaven Dr NE, Concord, NC 28025-2438 on the right The last intersection is Sycamore Ridge Rd NE If you reach Dickens Rd NE, you've gone too far	0.0 mi

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1031 Braxton Dr, Concord, NC 28025-6833 (Directions to approximate location.)



Highway 601 Byp S & Highway 49 S, Concord, NC 28025

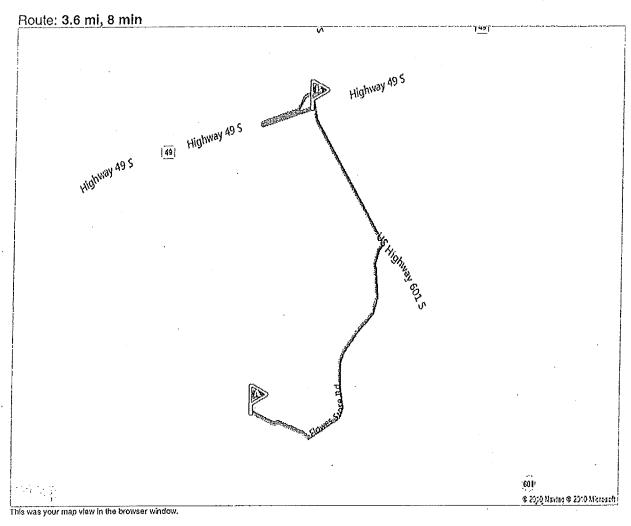
Route: 3.6 mi, 8 min

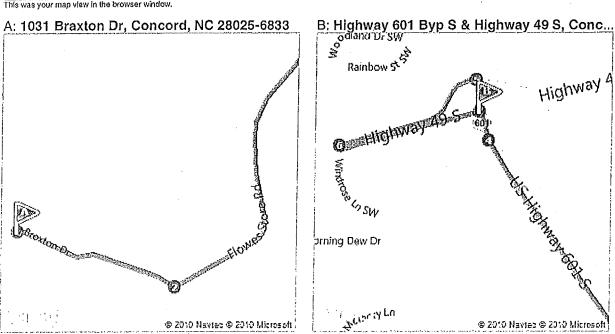


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1031 Braxton Dr, Concord, NC 28025-6833	A-B: 3.6 mi 8 min
Depart Broxton Dr toward Daffodil Ln	0.4 mi
2. Turn left onto Flowes Store Rd	1.4 mi
3. Turn left onto US-601 / US Highway 601 S	0.9 mi
4. Road name changes to US-601 / US-601 Byp / Highway 601 Byp S US-601 S / US-601-Byp S	/ 0.2 mi
5. Take ramp left and follow signs for SR-49 South / Highway 49 S	0.4 mi
6. Make a U-turn at Windrose Ln SW	0.4 mi
7. Arrive at Highway 601 Byp S & Highway 49 S, Concord, NC 28025 If you reach Atando Rd, you've gone too far	
n you rought, harries that you to got to to.	0.0 mi

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14836 Dunbeth Dr, Huntersville, NC 28078-3308

(Directions to approximate location.)



9030 Glenwater Dr, Charlotte, NC 28262-8563 (Directions to approximate location.)

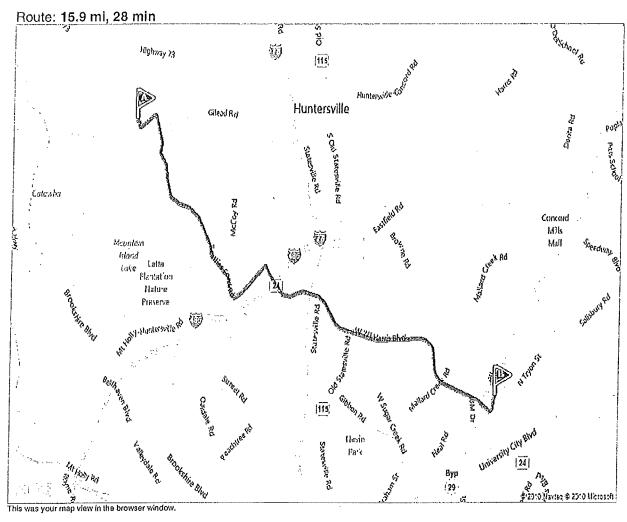
Route: 15.9 mi, 28 min

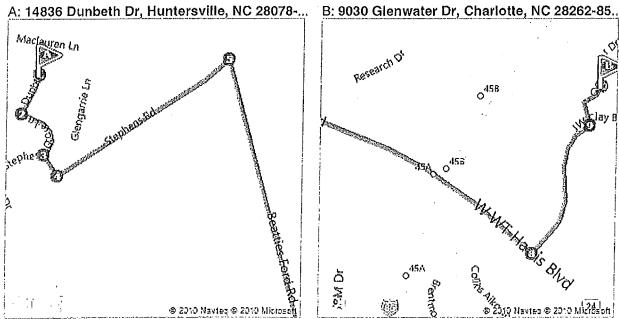
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	, 14836 Dunbeth Dr, Huntersville,	NC 28078-3308	A-B: 15.9 mi 28 min
	Depart Dunbeth Dr toward Step	hens Grove Ln	0.1 mi
4	2. Turn left onto Stephens Grove	Ln	0.2 mi
(=	3. Turn left onto Cathness Ave		0.1 mi
4	4. Turn left onto Stephens Rd		0.5 mi
	5. Turn right onto Beatties Ford R	d	5.2 mi
图	6. Bear left onto Mt Holly-Hunters	ville Rd	1.2 mi
➾ `	7. Turn right onto SR-24 / Vance R Pass JACK IN THE BOX on the left		8,2 mi
(=)	8. Turn left onto JW Clay Blvd TACO BELL on the corner		0.4 mi
(<u>E</u>)	9. Turn left onto Doug Mayes PI, as Glenwater Dr	nd then immediately turn right onto	0.1 mi
	10. Arrive at 9030 Glenwater Dr, Char The last Intersection is Doug Mayes Pl If you reach Emerald Cove Rd, you've		
			0.0 mi

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Bing Maps



14836 Dunbeth Dr, Huntersville, NC 28078-3308



1937 Trinity Church Rd, Concord, NC 28027-

(Directions to approximate location.)

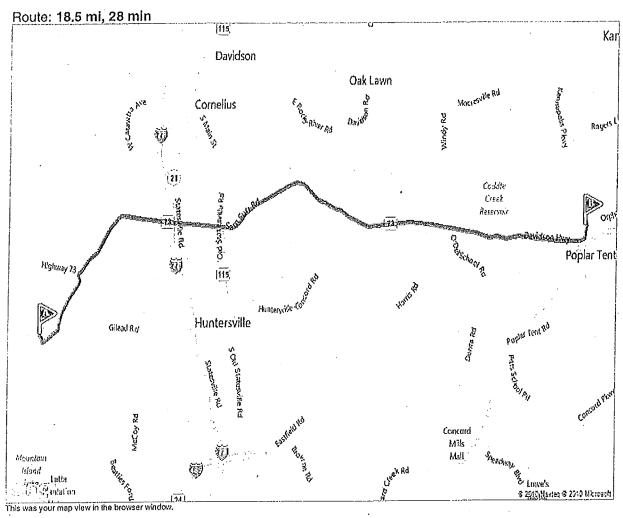
Route: 18.5 mi, 28 min

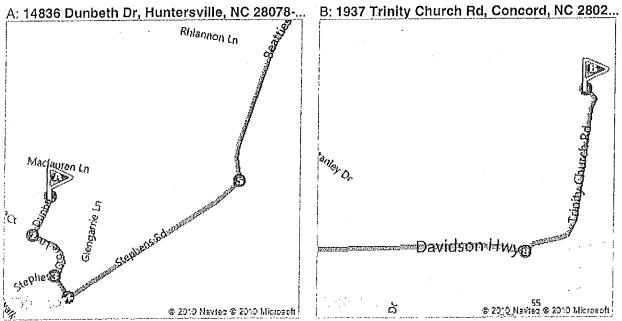
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R FREE! Use Bing 411 to find movies, Businesses & more: 800-BING-411

14836 Dunbeth Dr, Huntersville, NC 28078-3308	A–B: 18.5 mi 28 min
Depart Dunbeth Dr toward Stephens Grove Ln	0.1 mi
2. Turn left onto Stephens Grove Ln	0.2 mi
3. Turn left onto Cathness Ave	0.1 mi
4. Turn left onto Stephens Rd	0.5 mi
5. Turn left onto Beatties Ford Rd	1.4 mi
6. Turn right onto Brown Mill Rd	0.2 ml
7. Turn right onto SR-73 / Highway 73 Pass SHELL in 3.4 mi	15.5 mi 20 min
8. Bear left onto Trinity Church Rd 76/CIRCLE K on the corner	0.5 mi
9. Arrive at 1937 Trinity Church Rd, Concord, NC 28027-8418 on the left The last intersection is Orphanage Rd If you reach NW Cabarrus Dr, you've gone too far	0.0 mi

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McCoy Rd

1937 Trinity Church Rd, Concord, NC 28027-

(Directions to approximate location.)

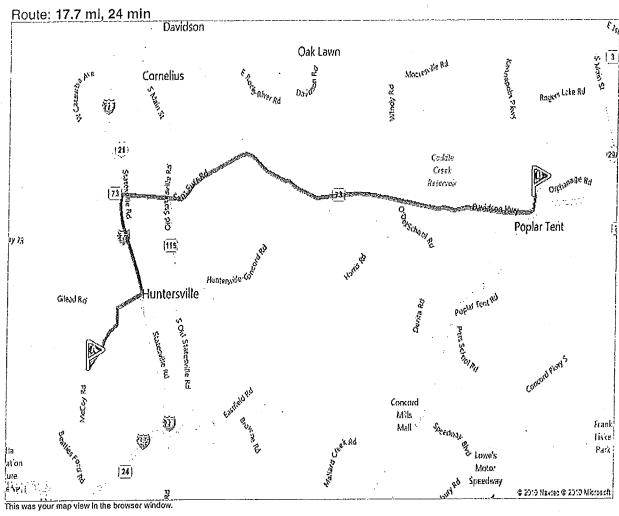
Route: 17.7 mi, 24 min

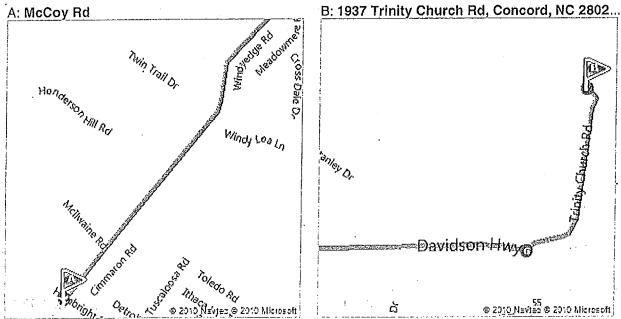
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McCoy Rd	A–B: 17.7 ml 24 min
Depart McCoy Rd toward McIlwaine Rd	1.7 mi
2. Turn right onto Gilead Rd	0.8 mi
3. Take ramp left for I-77 North	2.1 mi
4. At exit 25, take ramp right for SR-73 East toward Concord	0.3 mi
5. Turn right onto SR-73 East / Sam Furr Rd Pass SHELL in 0.2 mi	12.3 mi 15 min
6. Bear left onto Trinity Church Rd 76/CIRCLE K on the corner	0.5 mi
7. Arrive at 1937 Trinity Church Rd, Concord, NC 28027-8418 on the left The last intersection is Orphanage Rd If you reach NW Cabarrus Dr, you've gone too far	0.0 mi

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McCoy Rd

9030 Glenwater Dr, Charlotte, NC 28262-8563 (Directions to approximate location.)

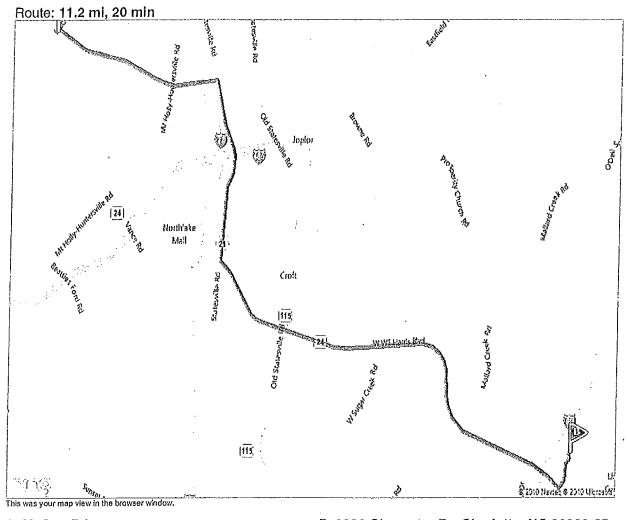
Route: 11.2 mi, 20 min

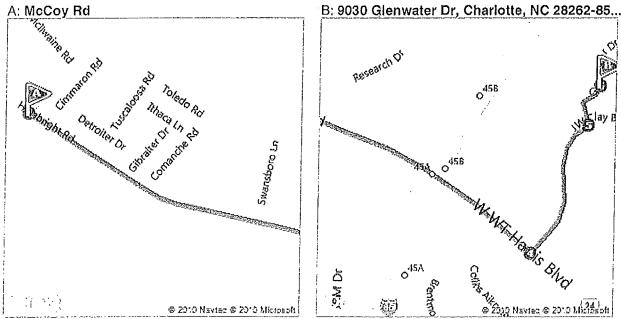
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a FREELUse Bing 411 to find movies, ⊎ businesses & more: 800-BING-411

	⊙ McCoy Rd	A–B: 11.2 mi 20 min
	Depart Hambright Rd toward Frontier Pl	2.4 mi
\Rightarrow	2. Turn right onto US-21 / Statesville Rd	2.2 mi
(=)	3. Turn left onto SR-24 East / W WT Harris Blvd Pass PIZZA HUT on the left in 3.0 mi	6.2 mi
(=	4. Turn left onto JW Clay Blvd TACO BELL on the corner	0.4 mi
<u> (</u> 2)	5. Turn left onto Doug Mayes PI, and then immediately turn right Glenwater Dr	onto 0.1 mi
	6. Arrive at 9030 Glenwater Dr, Charlotte, NC 28262-8563 on the ri The last intersection is Doug Mayes Pl If you reach Emerald Cove Rd, you've gone too far	
		0.0 mi

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5418 Twin Ln, Charlotte, NC 28269-4636 1937 Trinity Church Rd, Concord, NC 28027-8418

(Directions to approximate location.)

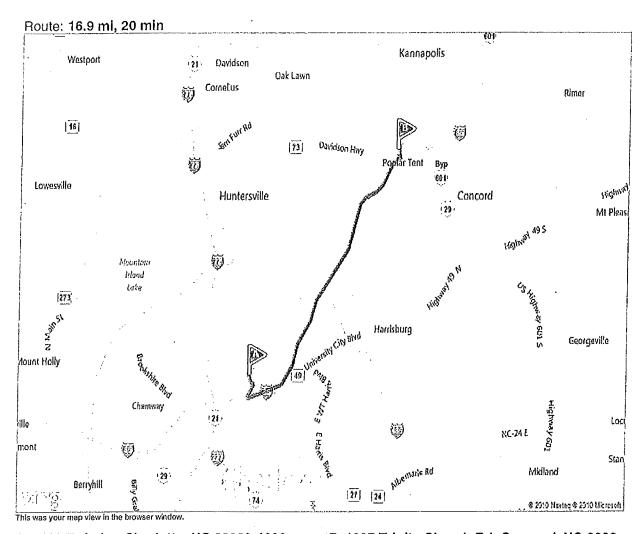
Route: 16.9 mi, 20 min

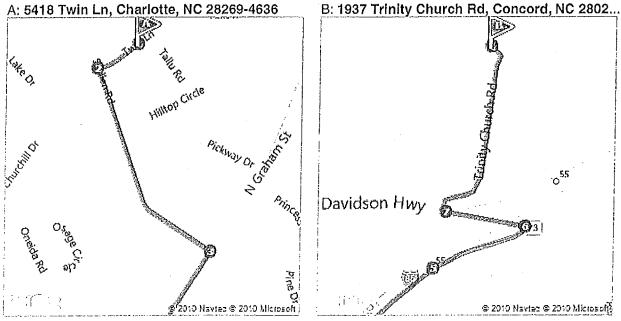
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5418 Twin Ln, Charlotte, NC 28269-4636	A-B: 16.9 mi 20 min
1. Depart Twin Ln toward S Allen Rd	0.1 mi
2. Turn left onto S Allen Rd	0.6 ml
3. Turn right onto N Graham St	0.7 mi
4. Take ramp left for I-85 North toward Concord	14.5 mi 13 min
5. At exit 55, take ramp right for SR-73 toward Concord / Huntersville	0.3 mi
6. Turn left onto SR-73 / Davidson Hwy	0.2 mi
7. Turn back on Trinity Church Rd	0.5 mi
8. Arrive at 1937 Trinity Church Rd, Concord, NC 28027-8418 on the left The last intersection is Orphanage Rd If you reach NW Cabarrus Dr, you've gone too far	0.0 mi

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Bing Maps



5418 Twin Ln, Charlotte, NC 28269-4636 (Directions to approximate location.)



9030 Glenwater Dr, Charlotte, NC 28262-8563 (Directions to approximate location.)

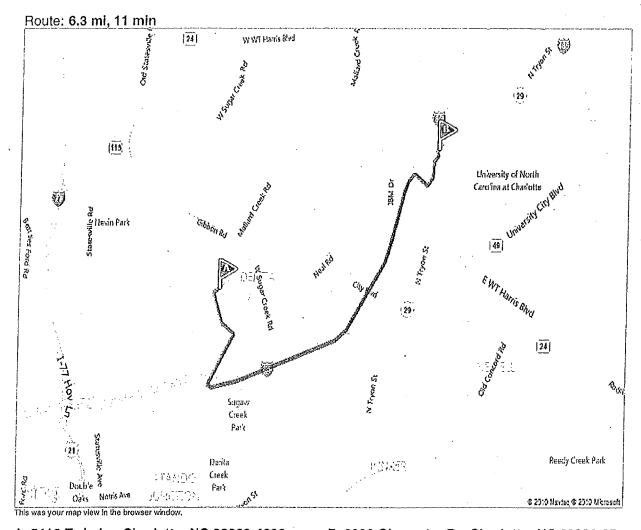
Route: 6.3 mi, 11 min

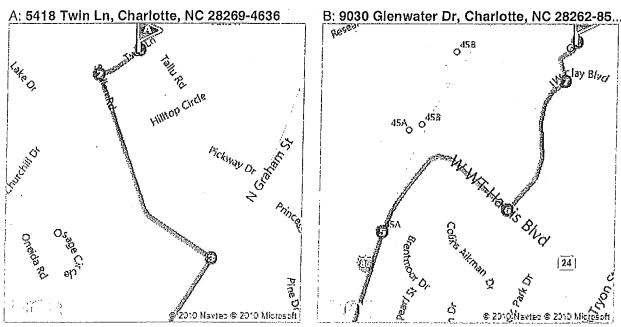


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5418 Twin Ln, Charlotte, NC 28269-4636	A–B: 6.3 mi 11 min
Depart Twin Ln toward S Allen Rd	0.1 mi
2. Turn left onto S Allen Rd	0.6 mi
3. Turn right onto N Graham St	0.7 mi
4. Take ramp left for I-85 North toward Concord	3.9 mi
5. At exit 45A, take ramp right and follow signs for SR-24 East Harris Blvd	st / W WT 0.5 mi
6. Turn left onto JW Clay Blvd TACO BELL on the corner	0.4 mi
7. Turn left onto Doug Mayes PI, and then immediately turn r Glenwater Dr	right onto 0.1 mi
8. Arrive at 9030 Glenwater Dr, Charlotte, NC 28262-8563 on The last intersection is Doug Mayes Pl If you reach Emerald Cove Rd, you've gone too far	the right
,	0.0 ml

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Bing	Maps
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3986 Carl Parmer Dr, Harrisburg, NC 28075-7449



1937 Trinity Church Rd, Concord, NC 28027-8418

(Directions to approximate location.)

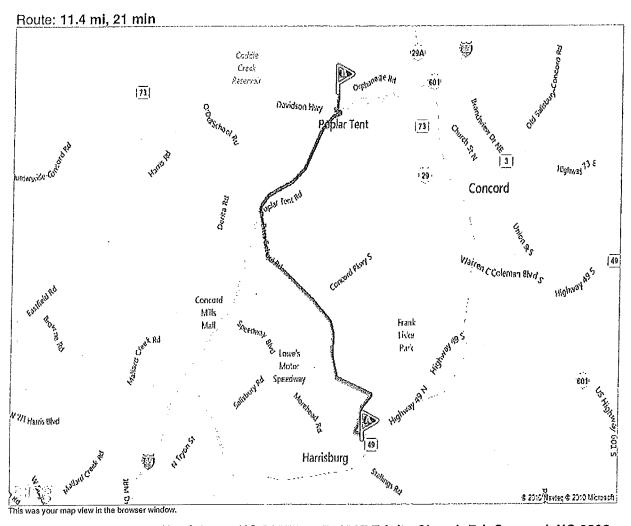
Route: 11.4 mi, 21 min

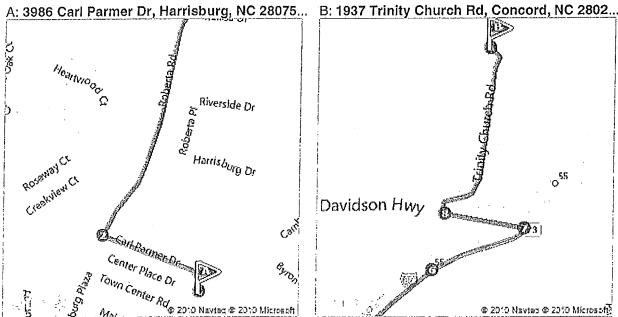
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	∂ (3986 Carl Parmer Dr, Harrisburg, NC 28075-7449	A–B: 11.4 mi 21 min
	1.	Depart Carl Parmer Dr toward Center Place Dr	0.3 mi
	2.	Turn right onto Roberta Rd	1.0 mi
4	3.	Turn left onto Pitts School Rd Pass EXXON in 2.8 mi	5.9 mi
(=	4.	Turn left onto Poplar Tent Rd	0.1 mi
闡	5.	Take ramp right for I-85 North	3.2 mi
B	6.	At exit 55, take ramp right for SR-73 toward Concord / Huntersville	0.3 mi
(7.	Turn left onto SR-73 / Davidson Hwy	0.2 mi
Ø	8,	Turn back on Trinity Church Rd	0.5 mi
	T	rrive at 1937 Trinity Church Rd, Concord, NC 28027-8418 on the left the last intersection is Orphanage Rd you reach NW Cabarrus Dr, you've gone too far	
		you readil 1999 Cabarrao Di, you vo gono too lar	0.0 mi

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3986 Carl Parmer Dr, Harrisburg, NC 28075-7449

(Directions to approximate location.)



9030 Glenwater Dr, Charlotte, NC 28262-8563 (Directions to approximate location.)

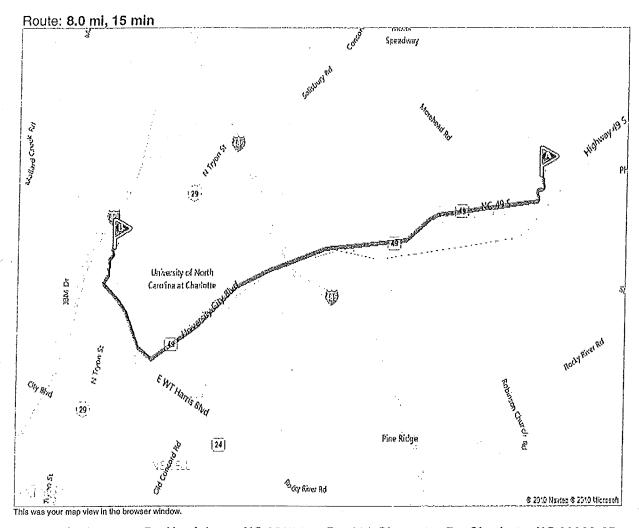
Route: 8.0 mi, 15 min

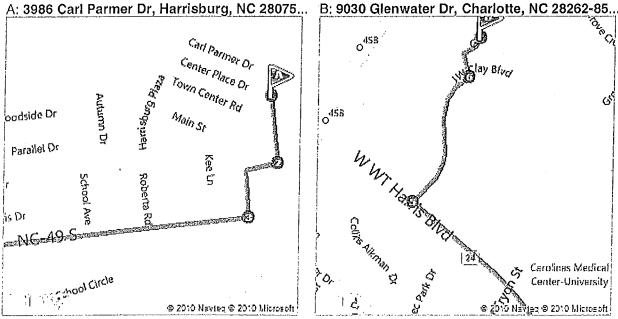
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	₍₂₎	986 Carl Parmer Dr, Harrisburg, NC 28075-7449	A-B: 8.0 mi 15 min
	1.	Depart Carl Parmer Dr toward Town Center Rd	0.2 mi
Þ	2.	Turn right, and then immediately turn left onto Main St	0.2 mi
\Rightarrow	3.	Turn right onto SR-49 / Highway 49 S CITGO on the corner	6.0 mi
24	4,	Take ramp right and follow signs for SR-24 West / E WT Harris Blvd	1.2 mi
	5.	Turn right onto JW Clay Blvd TACO BELL on the corner	0.4 mi
仓	6.	Turn left onto Doug Mayes PI, and then immediately turn right onto Glenwater Dr	0.1 mi
	7	rrive at 9030 Glenwater Dr, Charlotte, NC 28262-8563 on the right the last intersection is Doug Mayes Pl	
	If	you reach Emerald Cove Rd, you've gone too far	0.0 mi

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3986 Carl Parmer Dr, Harrisburg, NC 28075-7449



(Directions to approximate location.)
3310 Perry St, Concord, NC 28027-3901
(Directions to approximate location.)

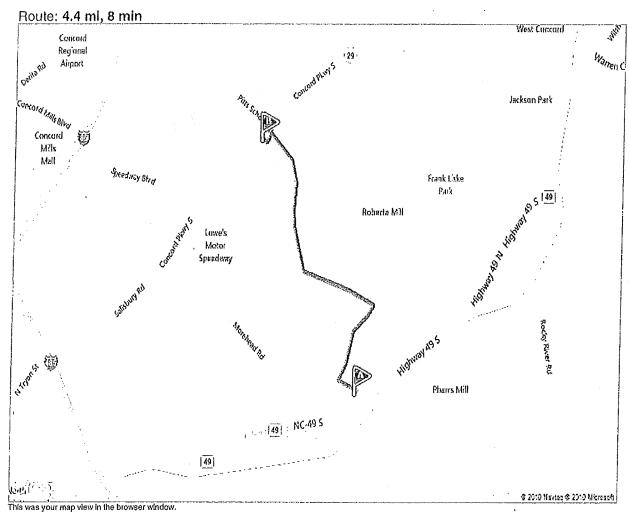
Route: 4.4 mi, 8 min

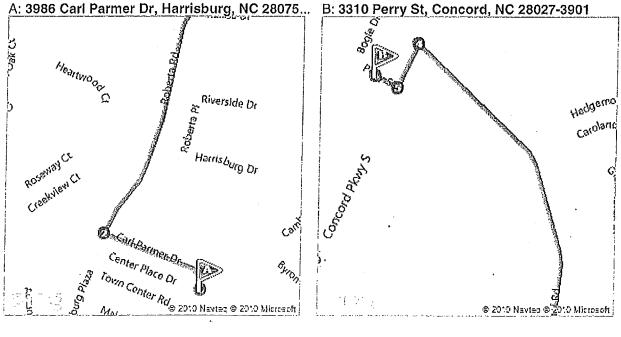
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3986 Carl Parmer Dr, Harrisburg, NC 28075-7449	A-B: 4.4 mi 8 min
Depart Carl Parmer Dr toward Center Place Dr	0.3 mi
2. Turn right onto Roberta Rd	1.0 mi
(= 3. Turn left onto Pitts School Rd	2.8 mi
4. Turn left onto US-29 South / Concord Pkwy S EXXON on the corner	0.1 mi
5. Turn right onto Perry St	0.1 ml
6. Arrive at 3310 Perry St, Concord, NC 28027-3901 on the left The last intersection is US-29 South / Concord Pkwy S If you reach Bogle Dr, you've gone too far	0.0 mi

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Bing Maps



221 Autumn Ln, Harrisburg, NC 28075-8408 1937 Trinity Church Rd, Concord, NC 28027-8418

(Directions to approximate location.)

Route: 11.4 mi, 16 min

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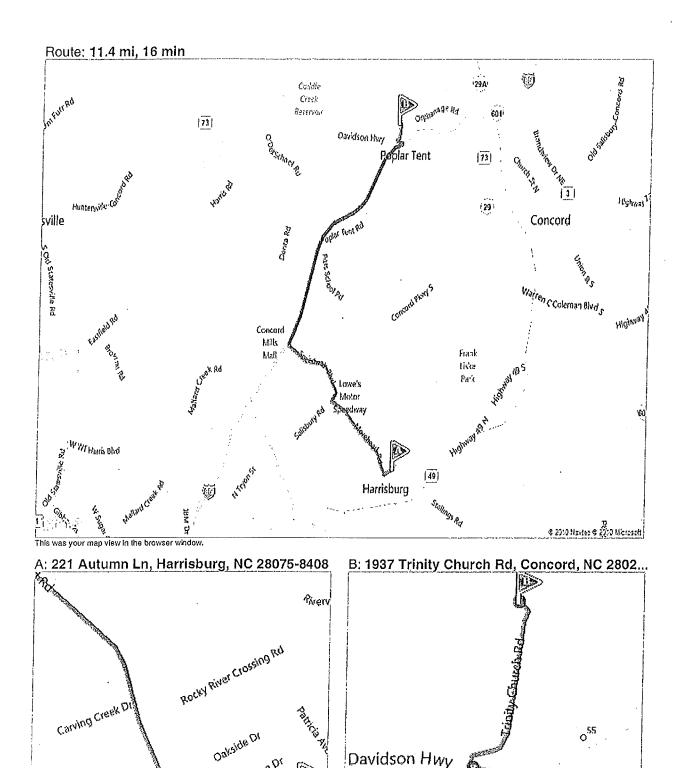
¥ FREE! Use Bing 411 to find movies, ○ businesses & more: 800-BING-411

221 Autumn Ln, Harrisburg, NC 28075-8408	A-B: 11.4 mi 16 min
1. Depart Autumn Ln toward Woodside Dr	0.3 mi
2. Turn right onto Morehead Rd	2.4 mi
3. Turn right onto US-29 North / Concord Pkwy S	0.2 mi
4. Turn left onto Speedway Blvd	1.9 mi
5. Take ramp right for I-85 North toward Concord	5,6 mi
6. At exit 55, take ramp right for SR-73 toward Concord / Huntersville	0.3 mi
7. Turn left onto SR-73 / Davidson Hwy	0.2 mi
8. Turn back on Trinity Church Rd	0.5 mi
9. Arrive at 1937 Trinity Church Rd, Concord, NC 28027-8418 on the left The last intersection is Orphanage Rd If you reach NW Cabarrus Dr, you've gone too far	
II you loudi 1444 Odbai lab bi, you to gollo too lar	0.0 mi

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Bing Maps



221 Autumn Ln, Harrisburg, NC 28075-8408 (Directions to approximate location.)



9030 Glenwater Dr, Charlotte, NC 28262-8563 (Directions to approximate location.)

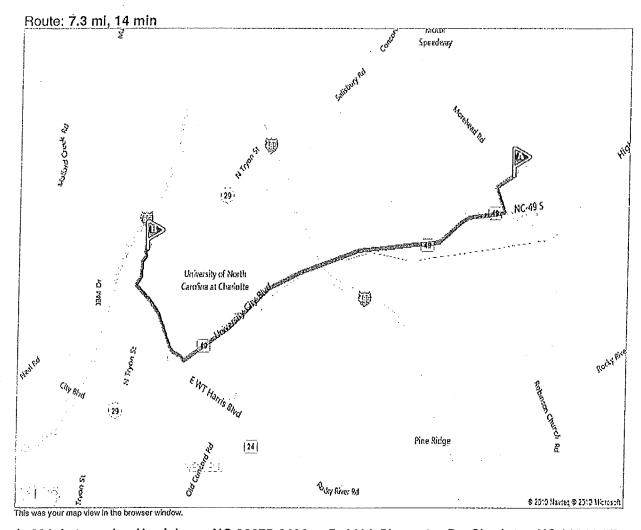
Route: 7.3 mi, 14 min

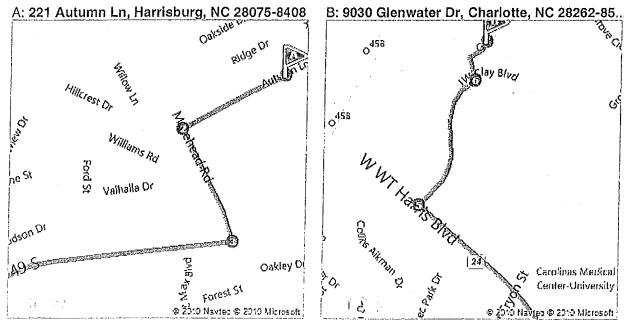
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FREE! Use Bing 411 to find movies, businesses & more: 800-BING-411

221 Autumn Ln, Harrisburg, NC 28075-8408	A–B: 7.3 mi 14 min
Depart Autumn Ln toward Woodside Dr	0.3 mi
2. Turn left onto Morehead Rd	0.3 mi
3. Turn right onto SR-49 / NC-49 S Pass HESS in 2.4 mi	5.0 mi
4. Take ramp right and follow signs for SR-24 West / E WT Harris	Blvd 1.2 mi
5. Turn right onto JW Clay Blvd TACO BELL on the corner	0.4 mi
仓。 Turn left onto Doug Mayes PI, and then immediately turn right Glenwater Dr	onto 0.1 mi
7. Arrive at 9030 Glenwater Dr, Charlotte, NC 28262-8563 on the right The last intersection is Doug Mayes Pl If you reach Emerald Cove Rd, you've gone too far	ght
	0.0 ml

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Bing Maps



221 Autumn Ln, Harrisburg, NC 28075-8408 (Directions to approximate location.)



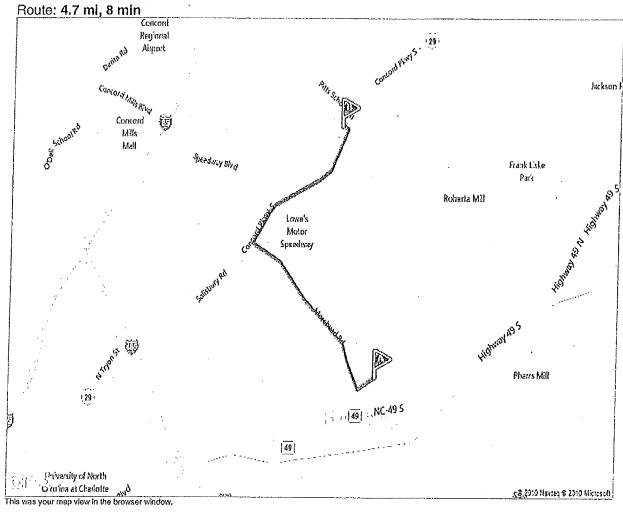
3310 Perry St, Concord, NC 28027-3901 (Directions to approximate location.)

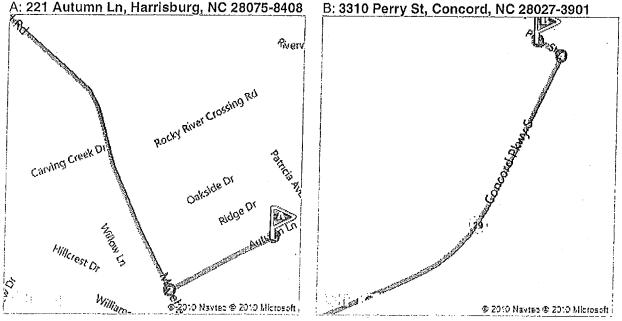
Route: 4.7 mi, 8 min

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221 Autumn Ln, Harrisburg, NC 28075-8408	A-B: 4.7 ml 8 min
Depart Autumn Ln toward Woodside Dr	0.3 mi
2. Turn right onto Morehead Rd	2.4 mi
3. Turn right onto US-29 North / Concord Pkwy S	2.0 mi
4. Turn left onto Perry St	0.1 mi
5. Arrive at 3310 Perry St, Concord, NC 28027-3901 on the left The last intersection is US-29 South / Concord Pkwy S If you reach Bogle Dr, you've gone too far	
	0.0 mi

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Education/Training Undergraduate School; Davidson College Medical School: UNC Chapel Hill Residency: UNC Hospitals, Chapel Hill Internship: UNC Hospitals, Chapel Hill

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