From: <u>Laura Rackley</u>

To: <u>DHSR.SMFP.Petitions-Comments</u>
Cc: <u>Kristy Hubard; Scott Whisnant</u>

Subject: NHRMC Operating Room Methodology Workgroup comments

Date: Tuesday, November 01, 2016 4:34:21 PM

Drs. Ullrich and Greene,

Please see below comments from New Hanover Regional Medical Center regarding the questions posed at the opening meeting on October 11 of the Operating Room Methodology workgroup:

- How should procedure rooms and procedures performed in them be treated?
 Licensure Application guidelines are not clear on this issue. NHRMC reports
 procedure room volumes as part of our surgery volumes but given the unclear
 guidelines expect that not all entities report the same. We fully support the
 generation of licensure guidelines to allow for data consistency among all
 reporting entities.
- How are decisions made regarding the use of an operating room or a procedure room? Our organization fully supports the development of guidelines within the licensure application to allow for consistent reporting as this continues to be an ongoing issue.
- Should the methodology's 3/1.5 hour per inpatient/outpatient surgery procedure time or other methodology assumptions be re-considered? With the ever growing shift from Inpatient to Outpatient for more complex cases, we feel this assumption should be reconsidered.
- Interventional radiology procedures are not included in the methodology. Are they
 in the Truven database? NHRMC reports these procedure on Licensure Renewal
 Application under section 10d. Other Imaging Equipment Special Procedures.
- Should the methodology use a tiered system based on the number of ORs or some other factor? What are the case time differences between urban and rural hospitals? In the current licensure application, surgical cases are currently broken down by "Surgical Specialty Area", Inpatient and Outpatient average procedure time by specialty area may be a viable option. We would not suggest utilizing actual OR times for submission as this may result in penalizing facilities that have been successful with OR efficiency (LEAN) efforts.

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