

Emailed comments from Dr. Dana Copeland

I have two thoughts for consideration. First, while it's difficult to know what the current congress and administration will do regard to healthcare, I think it extremely likely that the result will not be a net decrease in services available to the poor and uninsured. Growth of some elective surgical procedures could well be reduced or even negative over the next few years. Uncertainty and expectation of reduced coverage would warrant caution in selecting too large a total number for statewide new need. Moreover the new methodology will be easier to tweak and fine tune in the future should demand be greater than expected.

I've also given some thought to the likelihood that the total number of need determinations for new ORs state wide will be greater than staff can reasonably handle in one year. Should that be the case the suggestion already made to stage the roll out over several years has considerable merit. How to stage is important and could have significant consequences. Service areas with new need greater than a single OR could have new need rolled out over a two or three year period. I fear such an approach could increase friction and distrust between competing providers and lead to extensive appeal and delaying actions. It would also make it more difficult for new providers to enter a market. To minimize the contentiousness of the roll out, I would suggest the committee and staff consider the following process.

Once total need is determined rank service areas by ratio of new need to existing inventory. Depending on the total number divide the roll out into either a two or three year process. Those service with the highest discrepancy between need and current inventory would have all new need rolled out in the first year. This would encourage more collaboration and compromise between existing providers and make it possible in some service areas for new providers to submit viable proposals. Providers in service areas to have new ORs rolled out in the second and third years would have time to plan and negotiate, hopefully reaching some measure of compromise before submitting applications.