

Carolinas Medical Center-Union

Edwards Cancer Center

DFS HEALTH PLANNING
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Medical Facilities
Planning Section

Dear Ms. Potter,

I understand that Dr. Kevin Khoudary and the Cary Urology group have filed a petition for a CON to start a radiation oncology facility dedicated specifically to the treatment of prostate cancer in Wake County, NC. As the Medical Director of the Radiation Oncology Department at CMC-Union, in Monroe (Union County), NC, I would like to express my strong opposition to this proposal.

Prostate cancer patients in Wake County are currently well-served by four radiation treatment centers. These centers are capable of providing modern radiotherapy, using IMRT and IGRT, for prostate cancer patients. In addition, the nearby university centers of UNC and Duke University provide excellent multidisciplinary care for prostate cancers in the region.

I do not believe that it is wise for the state, or for any agency, to approve CONs for centers that are specifically dedicated to the treatment of any one type of cancer. This would open the door to other specialty groups that might propose a center for the treatment of breast cancer, or for lung cancer, or gynecologic cancer, etc. There is no reason to believe that state of the art radiation care cannot be provided by competent, well-trained radiation specialists in the centers currently in operation in the region.

Finally, and **most important**, a radiation facility owned by Urologists, and specifically dedicated to the treatment of prostate cancer, raises very serious concerns about the potential for self-referral abuse and over-utilization. These abuses are much more likely to occur when the treatment facility is owned by physicians who are making the referrals to that facility, and when the referring physicians are benefiting substantially from those referrals.



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Thank you very much for your consideration. Please feel free to contact me if you have any questions, or if I might provide any further information.

Sincerely,

Thomas G. Trautmann, M.D.

Medical Director, Radiation Oncology Department

CMC-Union Hospital

RADIOLOGY ONCOLOG