

Mugust 28, 2008

Ms. Victoria McClanahan, Planner Medical Facilities Planning Section Division of Health Services Regulation 2714 Mail Center Raleigh, North Carolina 27699

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Medical Facilities Planning Section

RE: Randolph Hospital and Randolph County Surgeons Petition for a three operating room need determination in the 2009 State Medical Facilities Plan (SMFP) /HSA II/Randolph County

Dear Ms. McClanahan,

Attached you will find several letters of support from members of the Randolph County Medical Community. Some of our co-petitioners have written letters of support that more specifically describe what this special need determination would mean to their specialty. As you prepare the agency decision, I wanted to draw your attention to these letters and several points of interest about the Randolph Hospital, et.al. petition.

Last year, we asked for one room in a conservative effort to gain OR access and we relied heavily on the assumptions set forth in the OR methodology. That is not the intended purpose of a special need petition. We come to you this year to address our need in terms of what is required to meet the basic principles of the State Medical Facilities Plan of Cost, Quality and Access to Care. The citizens of Randolph County deserve the same access that is afforded to other counties. They deserve the cost savings, efficiencies, and flexibilities that an Ambulatory Surgery Model provides without compromising their access to inpatient surgical care. Our physicians want to be able to meet the needs of their customers and provide them with options in when they receive their care. In fact, last year we had 10 co-petitioning physicians because many didn't believe that one additional OR would address the problem. We now have 22 copetitioners because they believe that 3 ORs can address the access issues and aid in recruiting additional surgeons.

This petition represents a collaborative team of surgeons and a hospital seeking a special need determination to improve access for our citizens. My co-petitioners include the following:

- 3 Urologists
- 1 ENT
- 1 Podiatrist
- 3 Anesthesiologists
- 4 General surgeons
- 3 Orthopedic surgeons
- 5 Ob-Gyns
- 1 Ophthalmologist
- 1 Oral Surgeon

Every surgical specialty present in Randolph County is represented and the vast majority of practices are represented for a total of 22 physicians and the hospital. This unique collaboration is the result of the universal realization in our community that operating room access needs to improve. Once the need determination is in the SMFP, we all plan to work together to complete a CON application that results in a collaborative ambulatory surgery center model.

Also, I would like to call your attention to the discussions that occurred at the public hearing held in Greensboro on July 18<sup>th</sup>. The SHCC members present urged us to petition for the number of Operating Rooms needed to correct the current outmigration problem, to allow for appropriate economies of scale for a multispecialty surgery center, and to strive to do this in a cost effective manor without negatively impacting inpatient surgical care in Randolph County. We are aware that the Agency or the SHCC may adjust the requested allocation in a special need petition during the process of the petition review and approval.

In closing, please do not hesitate to contact me or our Planning Director, Kelly Butler, if you require additional information relating to this petition. In fact, our co-petitioners and I would be happy to discuss any element of this petition with you and DHSR staff at your convenience. Please contact Kelly Butler at (336) 328-3543 to schedule a conference call or meeting to discuss the petition.

Sincerely,

Robert E. Morfison

President



August 6, 2008

To Members of the State Health Coordinating Council

Anesthesia of Randolph County has been the exclusive anesthesia provider for Randolph Hospital since January of 2001. This is by far the longest tenure of any anesthesia group in the recent history of the hospital. The hospital has had significant difficulty recruiting both Anesthesiologists and CRNAs to practice here in Asheboro. We initially began the practice with only two doctors and it took us over two years to recruit a third doctor. We have finally fully staffed all of our CRNA positions after years of short staffing and extensive use of *Locum Tenens* providers. The group enthusiastically supports the petition before the State Health Coordinating Council for an additional three rooms for Randolph County.

The current situation of five operating rooms requires that our group, practicing in a care team mode, has to practice in a very inefficient and non-cost effective manner. With CMS conditions of participation limiting anesthesiologist medical direction of CRNAs to a 1:4 ratio, either one operating room must be staffed solely by an anesthesiologist or we must use a total of seven anesthesia providers to cover these rooms, rendering a very wasteful use of scarce and expensive anesthesia providers. The additional rooms would allow expansion of service and would result in more favorable medical direction ratios even if sites were remote.

The current number of rooms and absence of a dedicated outpatient facility has significant detrimental effects for our patients, especially those at the extremes of age. Limited block space and frequent disruption of the elective schedule by inpatient emergencies and an expanding obstetric burden pushes many outpatient procedure to start much later in the day than is considered optimal. Long wait periods and prolonged fasting contribute to anxiety, volume depletion, and poor blood sugar control in diabetics. Many of our outpatients have procedures concluding in the late afternoon or early evening requiring a rather hurried recovery or unanticipated overnight admission. In addition, long surgery schedules take there toll on physicians and nurses. We have an aging anesthesia and surgical staff here at Randolph Hospital, so long work days can lead to fatigue, stress, higher error rates, and an overall decreased quality of care. The residents of Randolph County deserve better.

Ambulatory anesthesia is a recognized and very popular subspecialty within the practice of anesthesia. The better work hours and diminished call responsibility seen in dedicated outpatient facilities, are often sought after attributes for many new graduates considering employment options. The absence of a dedicated outpatient facility greatly diminishes the attractiveness of an anesthesia position at Randolph hospital further hampering recruitment.

All the members of our department are now well established in Asheboro and a vital part of the community. We hear our friends and neighbors lamenting the lack of access and the total absence of a local outpatient option. As practitioners at Randolph Hospital as well as citizens of Randolph County we urge you to give this petition careful consideration and hopefully a favorable reception.

William C. Buhrman, M.D.

Peter M. Carignan, M.D.

James Walson, M.D.

237-A N. Fayetteville Street • Asheboro, North Carolina 27203• 336-626-6371 • Fax 336-629-0436

Craig S. Gaccione, M.D., FACOG Yates A. Lennon, M.D., FACOG Cris R. Richardson, M.D., FACOG Karen L. Pryce, MBA, MHA Administrator

August 26, 2008

Ms. Victoria McClanahan, Planner Medical Facilities Planning Section Division of Health Services Regulation 2714 Mail Center Raleigh, North Carolina 27699

RE: Randolph Hospital and Randolph County Surgeons Petition for a three operating room need determination in the 2009 State Medical Facilities Plan (SMFP) /HSA II/Randolph County

Dear Ms. McClanahan,

The purpose of this letter is to provide support for the Randolph Hospital and Randolph County Surgeons' petition for a three operating room need determination in the 2009 State Medical Facilities Plan.

As an Obstetrician/Gynecologist that has practiced and lived in Randolph County for 10 years, I wanted to elaborate on what the addition of OR capacity would mean to my patients and my practice. We, as a group of 4 only have two days a week in the OR. That limits us and inconveniences patients in several ways. From our Obstetrical practice standpoint it means that if we need to schedule more than two repeat c-sections in a week, one of those patients would not be the first case of the day. This is very inconvenient for the pregnant patient and also for the pediatricians who must leave their office hours to come to the hospital to attend to the infant.

An Ambulatory Surgery Center would open more start times for us to get these cases done first. Also, much of our Gynecology caseload is outpatient. What happens to our patients is that because we try to perform those outpatient cases first, many of our same day cases get delayed late into the afternoon. This creates problems for the OR in terms of call staffing, etc. Many times due to medical problems with some of our inpatient cases, the outpatient cases get delayed and then end up going home very late in the day. The OB/Gyn patient population would benefit greatly from the added rooms and the new scheduling opportunities it would provide.

I am hopeful that you will provide a positive review of the Randolph Hospital and Randolph County Surgeons' petition and grant the requested adjusted need determination in the 2009 SMFP.

Sincerely

Central Carolina Women's Center



August 22, 2008

Ms. Victoria McClanahan, Planner Medical Facilities Planning Section Division of Health Services Regulation 2714 Mail Service Center Raleigh, North Carolina 27699

RE: Randolph Hospital and Randolph County Surgeons Petition for a three operating room need determination in the 2009 State Medical Facilities Plan (SMFP) /HSA II/Randolph County

Dear Ms. McClanahan,

The purpose of this letter is to provide support for the Randolph Hospital and Randolph County Surgeons' petition for a three operating room need determination in the 2009 State Medical Facilities Plan.

As Medical Oncologists, our patients often require surgical biopsies or surgery related to the diagnosis, staging, and removal of their cancer. Our patients would greatly benefit from the improved access and continuity of care that an ambulatory surgery center would provide because it would allow this aspect of treatment to be done close to home, and quickly so that our patients can begin or continue their course of treatment at the Cancer Center. Traveling out of town for surgery and follow-up appointments can be very taxing on our patients and their families, and we support more operating rooms for the county as surgery is often times critical in the care and treatment of cancer.

We are a little more than one month away from beginning to offer Radiation Therapy at a newly constructed Cancer Center in Randolph County. The ability to apply for a CON for this service was the result of a change to the methodology that supported the need for this service to be offered locally in rural counties. Randolph County citizens also deserve the benefit of more easily accessible operating rooms just as they deserve access to Radiation Therapy, and we hope that the State Health Coordinating Council will support this special need petition.

Thank you in advance for your consideration. Please do not he sitate to contact me for further information or support of this important endeavor.

Sincerely,

Dr. Christine McCarty Medical Director

Dr. DeQuincy Lewis

Medical Oncologist

713 South Fayetteville Street, Asheboro, NC 27203 (336) 626-0063 FAX (336) 626-356



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August 26, 2008

Ms. Victoria McClanahan, Planner Medical Facilities Planning Section Division of Health Services Regulation 2714 Mail Center Raleigh, North Carolina 27699

RE: Randolph Hospital and Randolph County Surgeons Petition for a three operating room need determination in the 2009 State Medical Facilities Plan (SMFP) / HSA II/Randolph County

Dear Ms. McClanahan,

The purpose of this letter is to provide support for the Randolph Hospital and Randolph County Surgeons' petition for a three operating room need determination in the 2009 State Medical Facilities Plan.

As an Internal Medicine Physician that has practiced and lived in Randolph County for 7 years, I wanted to convey why an Ambulatory Surgery alternative is important to the referring physician community. In these tight economic times, I am seeing more and more patients whose employers offer Health Savings Account Insurance Plans. This puts patients more at risk for covering the costs of all medical care, and requires them to consider cost in addition to quality in their health care decisions.

The lack of an Ambulatory Surgery Center in Randolph County is inconvenient for patients that must travel at least 60 miles round trip for consults, pre-op appointments, surgery, and multiple follow-up appointments. This is time away from work for the patient and often times, it also involves a family member or caretaker for elderly patients or patients whose conditions require a driver. These are 'costs' that come into play for my patients as well.

I support the Randolph County Surgeons' petition and the requested adjusted need determination for the 2009 SMFP because the citizens of Randolph County deserve the cost savings and convenience of an Ambulatory Surgery Center.

Sincerely,

Caroline C. Prochnau, MD



ASHEBORO Internal Medicine

132-A WEST MILLER STREET POST OFFICE BOX 5448 ASHEBORO, NC 27204 (336) 625-3248 PHONE (336) 625-6629 FAX KEUNG W. LEE, MD, PHD CAROLINE C. PROCHNAU, MD

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RE: Randolph Hospital and Randolph County Surgeons Petition for a three operating room need determination in the 2009 State Medical Facilities Plan (SMFP) / HSA II/Randolph County

Dear Ms. McClanahan,

The purpose of this letter is to provide support for the Randolph Hospital and Randolph County Surgeons' petition for a three operating room need determination in the 2009 State Medical Facilities Plan.

As a Family Physician that has practiced and lived in Randolph County for 9 years, I wanted to convey why an Ambulatory Surgery alternative is important to the referring physician community. In these tight economic times, I am seeing more and more patients whose employers offer Health Savings Account Insurance Plans. This puts patients more at risk for covering the costs of all medical care, and requires them to consider cost in addition to quality in their health care decisions.

The lack of an Ambulatory Surgery Center in Randolph County is inconvenient for patients that must travel at least 60 miles round trip for consults, pre-op appointments, surgery, and multiple follow-up appointments. This is time away from work for the patient and often times, it also involves a family member or caretaker for elderly patients or patients whose conditions require a driver. These are 'costs' that come into play for my patients as well.

I support the Randolph County Surgeons' petition and the requested adjusted need determination for the 2009 SMFP because the citizens of Randolph County deserve the cost savings and convenience of an Ambulatory Surgery Center.

Sincerely,

Keung W. Lee, MD



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Dear Ms. McClanahan,

The purpose of this letter is to provide support for the Randolph Hospital and Randolph County Surgeons' petition for a three operating room need determination in the 2009 State Medical Facilities Plan.

As a Family Physician that has practiced and lived in Randolph County for 14 years, I wanted to convey why an Ambulatory Surgery alternative is important to the referring physician community. In these tight economic times, I am seeing more and more patients whose employers offer Health Savings Account Insurance Plans. This puts patients more at risk for covering the costs of all medical care, and requires them to consider cost in addition to quality in their health care decisions.

The lack of an Ambulatory Surgery Center in Randolph County is inconvenient for patients that must travel at least 60 miles round trip for consults, pre-op appointments, surgery, and multiple follow-up appointments. This is time away from work for the patient and often times, it also involves a family member or caretaker for elderly patients or patients whose conditions require a driver. These are 'costs' that come into play for my patients as well.

I support the Randolph County Surgeons' petition and the requested adjusted need determination for the 2009 SMFP because the citizens of Randolph County deserve the cost savings and convenience of an Ambulatory Surgery Center.

Sincerely,

Douglas E. Schultz, MD



ASHEBORO Internal Medicine

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Dear Ms. McClanahan,

The purpose of this letter is to provide support for the Randolph Hospital and Randolph County Surgeons' petition for a three operating room need determination in the 2009 State Medical Facilities Plan.

As a Pediatrician that has practiced and lived in Randolph County for 8 years, I wanted to convey why an Ambulatory Surgery alternative is important to the referring physician community. In these tight economic times, I am seeing more and more patients whose employers offer Health Savings Account Insurance Plans. This puts patients more at risk for covering the costs of all medical care, and requires them to consider cost in addition to quality in their health care decisions.

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Sincerely,

Patricia A. Vinocur, MD



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As a Pediatrician that has practiced and lived in Randolph County for 12 years, I wanted to convey why an Ambulatory Surgery alternative is important to the referring physician community. In these tight economic times, I am seeing more and more patients whose employers offer Health Savings Account Insurance Plans. This puts patients more at risk for covering the costs of all medical care, and requires them to consider cost in addition to quality in their health care decisions.

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I support the Randolph County Surgeons' petition and the requested adjusted need determination for the 2009 SMFP because the citizens of Randolph County deserve the cost savings and convenience of an Ambulatory Surgery Center.

Kathleen A. Riley, MD



August 28, 2008

Ms. Victoria McClanahan, Planner Medical Facilities Planning Section Division of Health Services Regulation 2714 Mail Center Raleigh, North Carolina 27699

RE: Randolph Hospital and Randolph County Surgeons Petition for a three operating room need determination in the 2009 State Medical Facilities Plan (SMFP) / HSA II/Randolph County

Dear Ms. McClanahan,

The purpose of this letter is to provide support for the Randolph Hospital and Randolph County Surgeons' petition for a three operating room need determination in the 2009 State Medical Facilities Plan.

As a Cardiologist that has practiced and lived in Randolph County for 12 years, I wanted to convey why an Ambulatory Surgery alternative is important to the referring physician community. My practice is a significant referral source for elective orthopedic and general abdominal surgery in our community.

The lack of an Ambulatory Surgery Center in Randolph County is inconvenient for patients that must travel at least 60 miles round trip for consults, pre-op appointments, surgery, and multiple follow-up appointments. This is time away from work for the patient and often times, it also involves a family member or caretaker for elderly patients or patients whose conditions require a driver. These are 'costs' that come into play for my patients as well.

I support the Randolph County Surgeons' petition and the requested adjusted need determination for the 2009 SMFP because the citizens of Randolph County deserve the cost savings and convenience of an Ambulatory Surgery Center.

Sincerely,

Brain J. Munley, M.D. Munley NO FACC FCCP