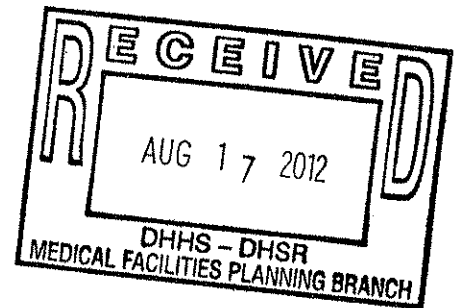


August 17, 2012



Sandra Greene, DrPH  
Chair, Acute Care Services Committee  
North Carolina State Health Coordinating Council  
c/o Medical Facilities Planning Section  
North Carolina Department of Health and Human Services  
Division of Health Service Regulation  
809 Ruggles Drive  
Raleigh, North Carolina 27603

Re: Proposed Need Determination in the Draft 2013 SMFP for 119 Acute Care Beds in the Cumberland/Hoke Service Area

Dear Dr. Greene:

I am the Chairman of the Hoke County Board of Commissioners. I understand that the State Health Coordinating Council has included in the draft 2013 SMFP a need determination for 119 new acute care beds for the Cumberland/Hoke Service Area. I would like to thank the SHCC and the staff of the Medical Facilities Planning Section for their hard work in helping to bring additional health care services to the citizens of North Carolina. As I explain below, the needs are especially great in my county and in the surrounding area.

I understand that Cape Fear Valley Health System has filed a petition with the SHCC seeking to delete the need determination from the 2013 SMFP. I and Vice Chair Tony Hunt are writing to express our strong opposition to Cape Fear Valley's petition. While Cape Fear Valley may be most interested in Cumberland County, the needs of the entire service area, which includes Hoke County, must also be considered.

As you may know, Hoke County is a predominantly rural county. Hoke County currently has no hospital or emergency room within its borders. A large percentage of our population is African American or Native American. Many of our residents live below the poverty level and have tremendous difficulties (both financial and geographic) obtaining access to health care. The health status of many of our residents is poor, and many of them suffer from chronic conditions like heart disease, diabetes and pulmonary disease. While I am hopeful that the opening of two new hospitals in Hoke County in the coming years will help improve access for our residents and therefore improve their health status, it would be naive to think that all of Hoke County's health care problems will be solved once these two hospitals

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open. The problems are deep-rooted and it will take many years and hard work by our health care providers, our citizens and our elected officials to address these issues.

In the meantime, our population is continuing to grow and age. In fact, the North Carolina Office of State Budget and Management projects that between 2010 and 2020, our county population will grow from 47,606 to 60,596, an increase of 27.3%. In the 65+ age range, the population is expected to grow from 3,557 to 6,049, an increase of 70.1%. In the 45-64 age range, the population is expected to grow from 10,297 to 13,056, an increase of 26.8%. The growth in these age groups will increase the demand for hospital services, including inpatient services.

It is my understanding that as soon as one of the two new hospitals in Hoke County opens, Hoke County will become its own service area for SMFP purposes. Therefore, utilization of hospital beds in Cumberland County will no longer be counted for Hoke County. I am very concerned that if this need determination is deleted from the 2013 SMFP, it will be many years before either hospital in Hoke County would be able to add beds.

As you may be aware, Cape Fear Valley first applied for the 41 beds that are going to Hoke County back in 2004. It was only in 2009 that Cape Fear Valley informed the State that it wanted to locate those beds in Hoke County. The 65 beds in last year's Cumberland/Hoke review were awarded to Cape Fear Valley to be installed in a new hospital in northern Cumberland County. It is my understanding that Cape Fear's petition predicts that it will win this year's 28-bed review for Hoke/Cumberland. Cape Fear intends to install those beds in Fayetteville. If Cape Fear's prediction about the 28-bed review proves correct, and if Cape Fear's petition to delete the 119 bed need determination succeeds, then there will be no more beds for Cumberland or Hoke County for some time. This seems very unfair to me. It should not be up to CFVHS or Cumberland County to decide the future bed needs of this region.

It also seems very short-sighted to delete a need determination when the statistics show continued growth in the region as well as significant barriers to access in health care. Like Hoke County, Cumberland County's population is projected to continue to grow. Like Hoke County, Cumberland County has a significant minority population. Like Hoke County, many residents live below the poverty level and many residents suffer from chronic health conditions.

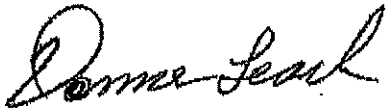
Even with the two hospitals in Hoke County, some of the more serious health care problems facing our residents will have to be addressed at the larger hospitals like Cape Fear Valley and Moore Regional. According to Cape Fear Valley's 28-bed application, by 2018, Cape Fear Valley Medical Center will need 42 more beds. In addition, Cape Fear Valley North is projected to need 5 more beds and Hoke Community Medical Center is projected to need 6 more beds, for a total need of 53 beds. That is based on a very conservative approach; if the growth is closer to what it has actually been, the need for beds is going to be much greater.

Having robust health care services is also vital in keeping and attracting businesses to the region. Health care is one of the first things prospective new businesses ask about when they are looking at our region. I believe it would send a very negative, anti-business message to both existing businesses and businesses that are considering our region that the State of North Carolina has said "no" to more hospital beds in this region.

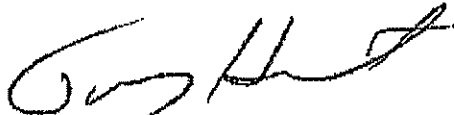
Taking all of these things into account, I find it disturbing that Cape Fear Valley would say "no" to more beds in the 2013 SMFP when it has to be ready to deal with these challenges in the future. I, and fellow Commissioner Hunt, believe the best course is for the State to follow its need methodology, and include a need determination in the 2013 SMFP for 119 more beds for the Cumberland/Hoke Service Area.

Thank you for taking time to consider these comments. If you have any questions, please feel free to contact me.

Sincerely,



James Leech  
Chair  
Hoke County Board of Commissioners



Tony Hunt  
Vice Chair  
Hoke County Board of Commissioners