

**RECEIVED**

By K Fisk at 2:47 pm, Aug 16, 2012



WakeMed Health & Hospitals

3000 New Bern Avenue  
Raleigh, North Carolina 27610  
919-350-8112

William K. Atkinson, PhD, MPH  
President & CEO

August 15, 2012

Thomas J. Pulliam, M.D., Vice Chairman  
North Carolina State Health Coordinating Council  
c/o Medical Facilities Planning Section  
Division of Health Service Regulation  
2714 Mail Service Center  
Raleigh, NC 27699-2714

**Re: Support for Johnston Health Petition: Change in the Certificate of Need rules that would allow for the provision of interventional cardiac catheterization services in North Carolina**

Dear Dr. Pulliam:

On behalf of WakeMed Health & Hospitals, I am writing in support of Johnston Health's petition to change language in the *2013 State Medical Facilities Plan* (SMFP) to allow hospitals in North Carolina to provide interventional cardiac catheterization procedures without open heart backup. Johnston Health submitted their petition on August 1, 2012. Ruth Marler and Dr. Matthew Hook spoke for Johnston Health.

WakeMed agrees that the current language promotes inequity across the state and is based purely on when a facility purchased its equipment. As Johnston Health noted in its petition, recent research indicates that with proper safety protocols and patient selection guidelines in place, interventional cardiac catheterization procedures can be safely performed without open heart backup. Indeed, WakeMed is currently working with multiple hospitals to develop cardiac catheterization programs that provide interventional procedures without open heart backup.

It should be noted that in clarification of Johnston Health's list of hospitals that currently provide interventional procedures without open heart backup, WakeMed Cary Hospital does not (and may not under guidelines currently in place) perform interventional catheterization procedures. Although the *Proposed 2013 SMFP* indicates that WakeMed Cary Hospital performed interventional catheterization

procedures in FY 2011, this is based on the classification of procedure codes reported on the Hospital License Renewal Application.

In summary, WakeMed encourages the State Health Coordinating Council to change the *2013 SMFP* to allow hospitals to provide interventional cardiac catheterization procedures without open heart backup. Please note that our clinical staff and physicians would be happy to collaborate with the State to develop quality and safety guidelines in support of this process. If you have any questions, do not hesitate to contact me at (919)-350-8108 if you have any questions.

Respectfully,

A handwritten signature in black ink, appearing to read 'W.K.A.', followed by a long, horizontal, slightly wavy line that extends to the right.

William K. Atkinson, Ph.D.  
President & CEO