



August 14, 2015

North Carolina Division of Health Service Regulation
Healthcare Planning
2704 Mail Service Center
Raleigh, North Carolina 27699-2714

Attn: NC State Health Coordinating Council

Dear Dr. Ullrich and Members of the Council:

NCHA provides the following comments on petitions submitted for need adjustments to the Proposed 2016 State Medical Facilities Plan.

Acute Care Services Committee:

The Blue Ridge Bone & Joint Clinic petitions to be added to the Single Specialty Ambulatory Surgery Facility Demonstration Project. NCHA opposes the petition.

The Demonstration Project, established in the 2010 SMFP, was a decision to locate three single specialty ambulatory surgery centers in the three largest urban areas of the state. As part of the project, the SHCC established definitive measures to meet the three Basic Principles of Safety/Quality, Access and Value, as described in the North Carolina 2010 State Medical Facilities Plan. The success of the centers would be based on criteria established in Table 6D of that SMFP. While the demonstration projects are now in operation, final evaluation of the projects has not yet occurred. NCHA does not support expansion of the Single Specialty Ambulatory Surgery Facility Demonstration Project before the SHCC has had the opportunity to evaluate the success of the current facilities in the Project.

Technology and Equipment Committee:

Alliance Healthcare Services has petitioned for an adjusted need determination to establish that no additional fixed PET scanners can be converted to mobile PET in the context of the 2016 State Medical Facilities Plan. NCHA supported the establishment of Policy TE-1, which was first included in the 2015 SMFP, and NCHA sees no reason to suspend the Policy at this time. Further, NCHA believes that *Alliance* should not be seeking this change through a petition filed in the cycle for *Adjustments to Need Determinations* but instead through the *Changes in Basic Policies and Methodologies* process as described in Chapter Two of the State Medical Facilities Plan. NCHA opposes this petition.



Long Term and Behavioral Health Committee

LifeCare Hospitals of North Carolina has petitioned for 40 additional nursing care beds in Nash County to establish beds that would be available to patients in all of the following categories of conditions/needs: ventilator-dependency; tracheostomies; tracheostomies with bi-level positive airway pressure; bariatric status with tracheostomies; bariatric status over 300 pounds; IV antibiotics administered more than once daily; total parenteral nutrition; complex wounds; dialysis; ventilator dependency and/or tracheostomies combined with dialysis. Further, applicants shall not be required to demonstrate that the patient populations they propose to serve in these beds live within any particular distance of the facility.

Most North Carolina hospitals have, at one time or another, voiced a need for more nursing care beds to serve specialized conditions as described in the LifeCare Hospitals of North Carolina petition. Many of these patients have extended hospital stays while arrangements for nursing facilities are sought, and ultimately a North Carolina based nursing facility may not be found. This concern has also been discussed in meetings of the North Carolina Chapter of the American Case Management Association, and the need for additional beds to serve this population is evident. The beds proposed in the LifeCare petition may enable more patients to be served in a facility closer to their North Carolina home.

NCHA also believes that with its experience in providing therapies and serving the respiratory care needs of long term acute care patients, LifeCare Hospitals could be a successful applicant, should a need determination be established. NCHA supports this petition.

Please let me know if you have any questions, and thank you for your consideration.

Sincerely,

Mike Vicario,
NCHA Vice President of Regulatory Affairs