



**CAPE FEAR VALLEY HEALTH**

August 12, 2015

BEHAVIORAL HEALTH CARE  
BLADEN COUNTY HOSPITAL  
CAPE FEAR VALLEY MEDICAL CENTER  
CAPE FEAR VALLEY REHABILITATION CENTER  
HEALTH PAVILION HOKE  
HEALTH PAVILION NORTH  
HIGHSMITH-RAINEY SPECIALTY HOSPITAL

Sandra Greene, Ph.D., Chairman  
North Carolina State Health Coordinating Council Acute Care Sub-Committee  
c/o Medical Facilities Planning Section  
Division of Health Service Regulation  
2714 Mail Service Center  
Raleigh, NC 27699-2714

**Re: Cape Fear Valley Health System Comments Regarding the Knowles, Smith and Associates, LLP (d/b/a Village Family Dental)**

Dear Dr. Greene:

BLOOD DONOR CENTER  
CANCER CENTER  
CARELINK  
CAPE FEAR VALLEY HOMECARE & HOSPICE, LLC  
CUMBERLAND COUNTY EMS  
FAMILY BIRTH CENTER  
HEART & VASCULAR CENTER  
HEALTHPLEX  
LIFELINK  
CRITICAL CARE TRANSPORT  
PRIMARY CARE PRACTICES  
SLEEP CENTER

Cape Fear Valley Health System (CFVHS) appreciates the opportunity to comment on the Petition submitted by Knowles, Smith and Associates (d/b/a Village Family Dental) for an adjusted need determination in the 2016 SMFP for a specialty pediatric dental ambulatory surgical center in Cumberland County. While CFVHS understands the difficulties expressed by the Petitioners, CFVHS respectfully does not believe adding additional operating rooms in Cumberland County is the most effective health planning solution and does not support the changes requested by Village Family Dental for the following reasons.

1. A similar Petition was submitted in the Spring to add a new policy to allow the development of a specialty pediatric dental ambulatory surgical center in southeastern North Carolina. Comments submitted by CFVHS regarding that Petition remain relevant and are submitted here as Attachment 1. CFVHS has repeatedly offered available operating rooms to Village Family Dental. Village Family Dental has expanded care at one location only. Additional available operating room space is available.
2. During the Public Hearing process representatives of Village Family Dental stated that procedures currently done in the dental office will be done in the procedure rooms in the facility once developed. The fact that these procedures will now be eligible for an additional facility fee, increasing the cost of care for all those patients now treated in an ambulatory surgical facility instead of a dental office, needs to be part of the conversation regarding this Petition.

Thank you for the opportunity to comment.

Sincerely,

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CAPE FEAR VALLEY®  
TRANSFORMING HEALTHCARE™

March 20, 2015

Sandra Greene, Ph.D., Chairman  
North Carolina State Health Coordinating Council Acute Care Sub-Committee  
c/o Medical Facilities Planning Section  
Division of Health Service Regulation  
2714 Mail Service Center  
Raleigh, NC 27699-2714

**Re: Cape Fear Valley Health System Comments Regarding the Knowles, Smith and Associates, LLP (d/b/a Village Family Dental)**

Dear Dr. Greene:

Cape Fear Valley Health System (CFVHS) appreciates the opportunity to comment on the Petition submitted by Knowles, Smith and Associates (d/b/a Village Family Dental) to add a new policy to allow the development of a specialty pediatric dental ambulatory surgical center in southeastern North Carolina. CFVHS does not support the changes requested by Village Family Dental for the following reasons.

**1. Misrepresentation of Available Capacity at Cape Fear Valley Health System Surgical Facilities**

On page 5 of its Petition, Village Family Dental states that dental operation room block time at Highsmith Rainey (HRSH) for pediatric dentists is limited to one block a week. This is incorrect. Village Family Dental currently has block time every day in one of the three operating rooms at HRSH Monday through Friday with the exception of two Mondays a month. Surgical time has not decreased; in fact, available surgical time for Village Family Dental within the CFVHS recently has been increased.

In FFY 2014, 2,094 surgical cases were performed at HRSH, of these 1,075 were oral surgery. Of these 706 were pediatric dental cases performed by Village Family Dental providers. This is far more than one day block time per week. In fact, utilizing a case time of 2.5 hours per case and 90% utilization of available Village Family Dental block time, as suggested in the Village Family Dental Petition, this case volume equates to one operating room annually operating at a rate exceeding 80% of capacity.

**Village Family Dental Available Capacity at HRSH in FFY 2014**

706 Cases x 2.5 Hrs per Case = 1,765 Hrs @ 90% (VFD target utilization) = 1.765/.9 = 1,961 Hrs  
1,961 Surgical Hrs / 2,340 Hrs (SMFP OR Capacity) = 1 Operating Rooms at 83.8% of Capacity

Village Family Dental's statement on page 5 that dental surgery is restricted to the "older" operating rooms at HRSH implies that the facility is sub-standard and does not meet their surgical needs. In fact, the operating rooms at HRSH are accredited by The Joint Commission and have the same capabilities of all other shared operating rooms within the Cape Fear Valley Health System.

CFVHS considers Village Family Dental an important member of the Medical Staff and has worked with them to meet their surgical needs. In addition to providing expanded surgical hours, CFVHS has acquired specialty x-ray equipment for the pediatric dentists in the last several years.

## **2. Cape Fear Valley Health System Increased Surgical Capacity**

On March 9, 2015, Cape Fear Valley Health System opened CFV Hoke Hospital in Raeford, North Carolina. The new hospital has two operating rooms, one of which was relocated from HRSH and one of which is new to the total CFVHS surgical inventory in Cumberland and Hoke Counties. In addition to their block times at HRSH, Village Dental currently has one day a week in one of the two operating rooms at CFV Hoke. CFV Hoke was developed to shift primary care, including appropriate surgical care, for residents of Hoke County out of CFVMC in Fayetteville to the community hospital setting. As Village Family Dental's utilization at CFV Hoke warrants, additional blocks can be arranged for them. Further, as surgical volumes shift from Fayetteville operating rooms to CFV Hoke, additional time also may be available at HRSH and potentially CFVMC.

In addition, CFVHS has available surgical capacity at both Harnett Health in Harnett County and CFV Bladen County Hospital in Bladen County. Harnett Health has seven operating rooms between Central Harnett Hospital in Lillington and Betsy Johnson Hospital in Dunn. CFV Bladen has two operating rooms in Elizabethtown. Both of these facilities are very accessible to residents of Cumberland, Robeson, Harnett, Hoke and Bladen Counties. Additional block time is available at these hospitals. At a minimum 40 hours of block time could be made available at either of these underutilized surgical facilities.

## **3. Unnecessary Duplication Increasing the Operating Room Surplus in Southeastern North Carolina.**

In the 2015 SMFP, the three county area of Cumberland, Robeson and Hoke Counties had an operating room surplus of nearly 10 operating rooms. Both CFVHS and Southeastern Regional Medical Center are Medicaid Safety Net Providers. Both counties have significant Medicaid and uninsured populations and both providers meet the needs of all the population.

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Cape Fear Valley Medical Center has long been recognized as the safety net provider for patients regardless of income or insurance in south central North Carolina. As the tertiary provider for south central North Carolina, Cape Fear Valley Medical Center has no barriers to care for the uninsured and the underinsured. The development of a freestanding pediatric dental ambulatory surgery facility would negatively impact the efficient operation of the surgical unit at HRSH and would negatively impact financial viability of CFVHS.

**4. Village Family Dental and Anesthesiologist**

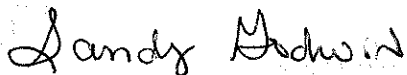
Several times throughout the Petition, Village Family Dental references difficulties with anesthesiology providers. The SMFP is not the vehicle to address difficulties between the dentists and anesthesiologists. The SMFP addresses capacity issues with operating rooms. As discussed above CFVHS has worked with the dentists at Village Family Dental and believes that sufficient operating room capacity exists.

**5. CFVHS Recommendation**

There is sufficient operating room capacity in Cumberland, Robeson, Harnett, Hoke and Bladen Counties to meet the surgical needs of Village Family Dental. Therefore, there is no need for the proposed Policy.

Again, thank you for the opportunity to submit our concerns regarding the Knowles, Smith and Associates (d/b/a Village Family Dental) Petition.

Sincerely,



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