



DUKE UNIVERSITY HOSPITAL
DUKE UNIVERSITY HEALTH SYSTEM

August 11, 2015

Dr. Christopher Ullrich, Chair, SHCC
North Carolina Division of Health Service Regulation
Healthcare Planning and Certificate of Need Section
2714 Mail Service Center
Raleigh, North Carolina 27699-2714

Dear Dr. Ullrich:

I am writing in support of the petition filed by LifeCare Hospitals of North Carolina, which would allocate additional skilled nursing beds in Nash County to care for patients with many conditions that are not typically accepted by most SNFs in the state. As a Health System with three acute care hospitals, Duke regularly discharges patients to LifeCare when they are in need of long term care that is most appropriately provided in an LTCH setting. Through the excellent care provided at LifeCare, the acute phase of their illness subsides for many of these patients, yet many still need care in a skilled nursing setting for many weeks or months. Most skilled nursing facilities simply do not accept patients with challenging conditions such as long term ventilator dependency, those needing dialysis, bariatric patients, patients with tracheostomies, with complex wounds or those receiving TPN. The few facilities that accept particularly challenging patients are usually full and the patients must continue to be cared for in an acute setting. This prevents patients from receiving care in the most appropriate setting and adds unnecessary costs to the healthcare system.

It is important to understand that skilled nursing facilities play an important role in the patient care continuum; however, it is understandable that most simply cannot care for patients with such particular needs. For that reason I support the LifeCare petition and hope that they are able to obtain a CON for this service. While I recognize that the approval of their petition will not guarantee them a CON, LifeCare already has the expertise to care for these types of patients in its LTCH and this experience and the services already available on its campus will enable it to provide effective skilled nursing care to these patients.

We believe that LifeCare's petition demonstrates a substantial special need for the allocation of these beds in Nash County, and we fully support the approval of its petition.

Very truly yours,

A handwritten signature in cursive script that reads "Pat Kramer".

Pat Kramer, Ed.S., ACC, CCM, CSW
Duke University Health System
Director of Case Management