

August 5, 2015

Dr. Christopher Ullrich, Chair, SHCC
c/o 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 in support of the petition filed by LifeCare Hospitals of North Carolina, which would allocate additional nursing care beds to care for patients with many conditions that are not typically accepted by most SNFs in the state. As an acute care hospital located in Rocky Mount, we regularly discharge 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. For patients with particular conditions, such as those that cannot be weaned from ventilators, those needing dialysis, bariatric patients, patients with tracheostomies, complex wounds or for those that receive TPN, most skilled nursing facilities simply do not accept these patients, and those that do are usually full. For patients that can be discharged from our hospital directly to a SNF, if they have one or more of these conditions, we are often unable to find a SNF able to care for them, 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, and we have many excellent SNFs in Nash County; 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 eventually able to obtain a CON for this service. While I recognize that the approval of their petition will not guarantee them a CON, I hope the SHCC will recognize that as an existing LTCH provider, their ability to develop a SNF on their campus to provide care to these patients with special needs would be a tremendous benefit to our patients. LifeCare already has the expertise to care for these types of patients in its LTCH; this experience and the services already available on its campus will enable it to provide effective nursing care to these patients.

Based on our estimates, we would anticipate referring as many as 700 patients per year that need the type of special skilled nursing care described in LifeCare's petition, which results in a need for approximately 49 nursing care beds for our patients alone. 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.

Please let me know if I can be of further assistance in your efforts.

Sincerely,



UNC Nash HealthCare