

Note that some letters are
not paginated



July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Presbyterian Medical Center

200 Hawthorne Lane, 8th Floor
Charlotte, NC 28204

NovantHealth.org

Re: Adjusted Need Petition for Additional Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

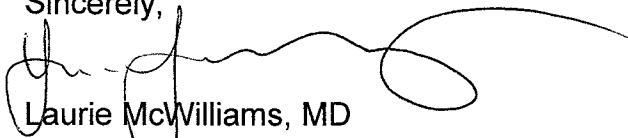
I am an active member of the Medical Staff at Novant Health Presbyterian Medical Center, board-certified in Neurocritical Care. As you may be aware, in Mecklenburg County there is only one provider of inpatient rehabilitation services. In addition, in the eight counties of HSA III, one provider controls 95% of existing rehabilitation beds.

As a neurointensivist, I have often experienced long delays in the admission of my patients to the existing inpatient rehabilitation center as a result of their high utilization. This delay further deters post stroke rehabilitation with longer hospital stays, susceptible to hospital-acquired infections, and disgruntled family members. As a result, many of my patients are not receiving needed inpatient rehabilitation services. In addition, the neurocritical care field has become more aggressive with mobility in the ICU. Research studies have shown ICU mobility programs improve patients' recovery, increasing the number of patients who initially were dispositioned to SNF and LTACHs, now dispositioned to acute and subacute rehabilitation centers. Our neurocritical care team is advancing our mobility in the ICU, yielding more patients requiring inpatient rehabilitation centers. This will require more availability in the inpatient rehabilitation center as we further progress our acute stroke management. Further, it is not unusual for my patients, which meet rehabilitation admission criteria, to be denied admission to the existing provider due to the facilities inability to meet the needs of my patient. As a result, many of my patients are not receiving needed inpatient rehabilitation services.

Novant Health, in partnership with HealthSouth is submitting an adjusted need determination for new rehabilitation beds in HSA III. I, and my colleagues, support the expansion of rehabilitation services in the Greater Charlotte Market. If approved, the Petition will increase access for patients currently denied timely care. This project will promote cost-effective approaches, expand access to health care services and encourage quality health care services by providing more efficient health care services to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval and this project.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laurie McWilliams', with a long, sweeping horizontal flourish extending to the right.

Laurie McWilliams, MD
Novant Health, Neurology Specialists
Neurocritical Care



Total Spine Specialists
2801 Randolph Road, Suite 100
Charlotte, NC 28211

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am a board certified physiatrist and serve as the Medical Director of psychiatry for the Novant Health Presbyterian Medical Center Joint Commission certified Advanced Comprehensive Stroke Center. We have been preparing for this certification for the last couple of years and were very excited to receive recognition of our efforts this past June. I am writing to support the Petition being submitted by Novant Health and HealthSouth for additional inpatient rehabilitation beds in HAS III. As you may be aware, in Mecklenburg County there is only one provider of inpatient rehabilitation services. In addition, in the eight counties of HSA III, one provider controls 95% of existing rehabilitation beds.

As a medical provider working with the NHPMC Advanced Comprehensive Stroke Center, I am aware of acute inpatient rehabilitation admission delays experienced by NHPMC patients as a result of the high utilization of those facilities. Further, it is my understanding that NHPMC patients, who meet rehabilitation admission criteria, may be admitted to a lower level of rehabilitation care (skilled nursing vs inpatient rehabilitation) due to the outside facilities' inability to meet the needs of Novant patients. As a result, many NHPMC patients are not receiving needed inpatient rehabilitation services.

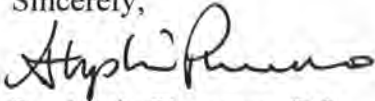
In addition, the lack of choice and competition in the market impacts continuity of care for Novant Health patients in Mecklenburg and surrounding counties. When NHPMC patients are admitted to one of the existing Carolinas Health System rehabilitation beds, our patients experience a break in continuity of care. Once admitted, even though Novant Health physicians and staff are given assurances otherwise, medical records and patient information are often not readily available for Novant Health staff once a patient is discharged. This makes it difficult for Novant Health physicians, nurse navigators, and rehabilitation professionals to provide continuing post-acute care for their patients. This severely impacts the continuity of care for Novant Health patients.

7/26/2017

Novant Health, in partnership with HealthSouth is submitting an adjusted need determination for new rehabilitation beds in HSA III. I, and my colleagues, support the expansion of rehabilitation services in the Greater Charlotte Market. If approved, the Petition will increase access for patients currently denied timely care. This project will promote cost-effective approaches, expand access to health care services and encourage quality health care services by providing more efficient health care services to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval and this project.

Sincerely,



Stephanie Plummer, DO

Novant Health Total Spine Specialists

Medical Director of Physiatry for the Novant Health Advanced Comprehensive Stroke Center

Board Certified American Academy of Physical Medicine and Rehabilitation



Presbyterian Medical Center

200 Hawthorne Lane
Charlotte, NC 28204

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am an active member of the Medical Staff at Novant Health Presbyterian Medical Center, board-certified in Neurocritical Care. As you may be aware, in Mecklenburg County there is only one provider of inpatient rehabilitation services. In addition, in the eight counties of HSA III, one provider controls 95% of existing rehabilitation beds.

As a neurointensivist, I have experienced long delays in the admission of my patients to the existing inpatient rehabilitation center in Mecklenburg County as a result of their high utilization. Delaying admission to inpatient rehabilitation will deter post stroke rehabilitation with longer hospital stays, which in turn increases a patient's susceptibility to hospital-acquired infections; and results in disgruntled family members. One reason for the delay, in addition to high occupancy at the existing inpatient rehabilitation hospitals is their refusal to accept patients from our hospitals over the weekend. In addition, after the weekend a repeat PT/OT evaluation is required 24 hours for re-evaluation, so our staff has to re-evaluate the patient, which can further delay the process after the weekend. When the patient is re-evaluated by PT/OT on Monday, a patient could now meet criteria for discharge home when they should have been placed in an inpatient rehabilitation setting three days earlier. As a result, many of my patients are not receiving needed inpatient rehabilitation services. They are discharged home with home health or outpatient rehabilitation but this is not the same level of care. The patient does not receive the aggressive inpatient rehabilitation needed for their optimal post stroke recovery. Lastly, some of the patients don't have the resources or family support to go home, therefore they might end up in a skilled nursing facility, again, lacking the resources for their full recovery.

As Novant Health has expanded the neuroscience service line over the past year, we have shown an increase in patients by 20%. With our new designation as a comprehensive stroke center as of June 2017, our expected growth over the next year is budgeted to be 10%. With the increase in growth of patients, new expertise bringing in more resources to improve our

patient's outcomes, more patients will be discharged from Novant Health Presbyterian Medical Center requiring acute inpatient rehabilitation services.

Lastly, once our patients are accepted into the Carolinas inpatient rehabilitation services, they are lost to follow up. The physicians don't receive reports or updates leading to a lack of continuity of care for the neurospecialists and the patient's primary care doctor, and lost patients.

Novant Health, in partnership with HealthSouth is submitting an adjusted need determination for new rehabilitation beds in HSA III. I, and my colleagues, support the expansion of rehabilitation services in the Greater Charlotte Market. If approved, the Petition will increase access for patients currently denied timely care. This project will promote cost-effective approaches, expand access to health care services and encourage quality health care services by providing more efficient health care services to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval and this project.

Sincerely,



Laurie McWilliams, MD
Novant Health, Neurology Specialists
Neurocritical Care



Matthews Medical Center

1500 Matthews Township Parkway
Matthews, NC 28078

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Inpatient Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am physician liaison, South Market Community Medicine, Novant Health Matthews Medical Center (NHMMC). In my role, I am writing to express my support and the support of my colleagues at NHMMC for the Petition being filed by Novant Health and HealthSouth for an Adjusted Need Determination for additional inpatient rehabilitation beds in HSA III. If approved, the Petition would allow for the development of a new inpatient rehabilitation facility and provider in the Greater Charlotte Market which will increase access for patients at NHMMC currently denied timely care.

The Petition being submitted for additional inpatient rehabilitation beds will allow an opportunity for a Novant Health and HealthSouth joint venture company to apply for a Certificate of Need in HSA III. As healthcare services move into the future concentrating on population health, leadership at Novant Health and HealthSouth have determined that partnering HealthSouth's inpatient rehabilitation expertise with Novant Health's integrated system of physician practices, hospitals and outpatient centers would create a dynamic partnership to promote enhanced access, quality and safety for the patients we serve.

Currently, patients in the Novant Health system have difficulty gaining admission to the current inpatient rehabilitation provider in Mecklenburg, Gaston and Cabarrus counties in HSA III. Patient admissions are often delayed, or denied, and many patients end up receiving care in other settings which do not provide the same level of intensive rehabilitation with an experienced rehabilitation team. This petition, if approved, will help to alleviate issues concerning access and ensure that patients receive the appropriate level of post-acute care in a timely manner. In addition, this project will promote cost-effective approaches and enhance the overall quality of healthcare services offered to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval of this Petition.

Sincerely,

A handwritten signature in blue ink that reads 'J. Mark Collins, MD'.

J. Mark Collins, MD
Physician Liaison, South Market Community Medicine
Novant Health Matthews Medical Center



Matthews Medical Center

1500 Matthews Township Parkway
Matthews, NC 28078

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Inpatient Rehabilitation Beds in HSA III

Dear Dr. Ullrich:


I am with the Novant Health Matthews Inpatient Physician Specialists, Novant Health Matthews Medical Center (NHMMC). In my role, I am writing to express my support and the support of my colleagues at NHMMC for the Petition being filed by Novant Health and HealthSouth for an Adjusted Need Determination for additional inpatient rehabilitation beds in HSA III. If approved, the Petition would allow for the development of a new inpatient rehabilitation facility and provider in the Greater Charlotte Market which will increase access for patients at NHMMC currently denied timely care.

The Petition being submitted for additional inpatient rehabilitation beds will allow an opportunity for a Novant Health and HealthSouth joint venture company to apply for a Certificate of Need in HSA III. As healthcare services move into the future concentrating on population health, leadership at Novant Health and HealthSouth have determined that partnering HealthSouth's inpatient rehabilitation expertise with Novant Health's integrated system of physician practices, hospitals and outpatient centers would create a dynamic partnership to promote enhanced access, quality and safety for the patients we serve.

Currently, patients in the Novant Health system have difficulty gaining admission to the current inpatient rehabilitation provider in Mecklenburg, Gaston and Cabarrus counties in HSA III. Patient admissions are often delayed, or denied, and many patients end up receiving care in other settings which do not provide the same level of intensive rehabilitation with an experienced rehabilitation team. This petition, if approved, will help to alleviate issues concerning access and ensure that patients receive the appropriate level of post-acute care in a timely manner. In addition, this project will promote cost-effective approaches and enhance the overall quality of healthcare services offered to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval of this Petition.

Sincerely,


Naveen Bandrupalli, MD
Novant Health Inpatient Physician Specialists
Novant Health Matthews Medical Center

July 26, 2017



Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Lakeside Family Physicians

19485 Old Jetton Road, Suite 100
Cornelius, NC 28031

nhlakesidefamilyphysicians.org

Re: Adjusted Need Petition for Additional Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am an active member of the Medical Staff at Novant Health Huntersville Medical Center, board-certified in Family Medicine. As you may be aware, in Mecklenburg County there is only one provider of inpatient rehabilitation services. In addition, in the eight counties of HSA III, one provider controls 95% of existing rehabilitation beds.

As a Family Physician, My partners and I have often experienced long delays in the admission of our patients to the existing inpatient rehabilitation center as a result of their high utilization. Further, it is not unusual for my patients that meet rehabilitation admission criteria to be denied admission to the existing provider due to the facilities inability to meet the needs of my patient. As a result, many of my patients are not receiving needed inpatient rehabilitation services.

Novant Health, in partnership with HealthSouth is submitting an adjusted need determination for additional inpatient rehabilitation beds in HSA III. I, and my colleagues, support the expansion of inpatient rehabilitation services in the Greater Charlotte Market. If approved, the Petition will increase access for patients currently denied timely care. This project will promote cost-effective approaches, expand access to health care services and encourage quality health care services by providing more efficient health care services to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval and this project.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. J. Atkinson'.

C. J. Atkinson, MD, FAAFP
Novant Health Lakeside Family Physicians
Novant Health North Charlotte Physician Lead
Novant Health Family Medicine Residency
Family Medicine – Teaching Faculty

T 704-384-1775
F 704-384-1776

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am an active member of the Medical Staff at Novant Health Presbyterian Medical Center, board-certified in Emergency Medicine. As you may be aware, in Mecklenburg County there is only one provider of inpatient rehabilitation services. In addition, in the eight counties of HSA III, one provider controls 95% of existing rehabilitation beds.

Even as an Emergency Medicine physician, I have often experienced the effect that long delays in the admission of patients to the existing inpatient rehabilitation center creates as a result of high utilization. Further, it is not unusual for my patients, that meet rehabilitation admission criteria, to be denied admission to the existing provider due to the facilities inability to meet the needs of my patient. As a result, many of my patients are not receiving needed inpatient rehabilitation services.

Novant Health, in partnership with HealthSouth is submitting an adjusted need determination for new rehabilitation beds in HSA III. I, and my colleagues, support the expansion of rehabilitation services in the Greater Charlotte Market. If approved, the Petition will increase access for patients currently denied timely care. This project will promote cost-effective approaches, expand access to health care services and encourage quality health care services by providing more efficient health care services to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval and this project.

Sincerely,



David E Rentz, MD, MPH
Medical Director, Emergency Services
Chair, Department of Emergency Medicine
Novant Health Presbyterian Medical Center
200 Hawthorne Lane, Charlotte, NC 28204



Matthews Medical Center
1500 Matthews Township Parkway
Matthews, NC 28078

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Inpatient Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am with the Novant Health Matthews Inpatient Physician Specialists, Novant Health Matthews Medical Center (NHMMC). In my role, I am writing to express my support and the support of my colleagues at NHMMC for the Petition being filed by Novant Health and HealthSouth for an Adjusted Need Determination for additional inpatient rehabilitation beds in HSA III. If approved, the Petition would allow for the development of a new inpatient rehabilitation facility and provider in the Greater Charlotte Market which will increase access for patients at NHMMC currently denied timely care.

The Petition being submitted for additional inpatient rehabilitation beds will allow an opportunity for a Novant Health and HealthSouth joint venture company to apply for a Certificate of Need in HSA III. As healthcare services move into the future concentrating on population health, leadership at Novant Health and HealthSouth have determined that partnering HealthSouth's inpatient rehabilitation expertise with Novant Health's integrated system of physician practices, hospitals and outpatient centers would create a dynamic partnership to promote enhanced access, quality and safety for the patients we serve.

Currently, patients in the Novant Health system have difficulty gaining admission to the current inpatient rehabilitation provider in Mecklenburg, Gaston and Cabarrus counties in HSA III. Patient admissions are often delayed, or denied, and many patients end up receiving care in other settings which do not provide the same level of intensive rehabilitation with an experienced rehabilitation team. This petition, if approved, will help to alleviate issues concerning access and ensure that patients receive the appropriate level of post-acute care in a timely manner. In addition, this project will promote cost-effective approaches and enhance the overall quality of healthcare services offered to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval of this Petition.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul Ledford'.

Paul Ledford, MD
Novant Health Inpatient Physician Specialists
Novant Health Matthews Medical Center



Matthews Medical Center
1500 Matthews Township Parkway
Matthews, NC 28078

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Inpatient Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am medical director for the Novant Health Matthews Inpatient Physician Specialists, Novant Health Matthews Medical Center (NHMMC). In my role, I am writing to express my support and the support of my colleagues at NHMMC for the Petition being filed by Novant Health and HealthSouth for an Adjusted Need Determination for additional inpatient rehabilitation beds in HSA III. If approved, the Petition would allow for the development of a new inpatient rehabilitation facility and provider in the Greater Charlotte Market which will increase access for patients at NHMMC currently denied timely care.

The Petition being submitted for additional inpatient rehabilitation beds will allow an opportunity for a Novant Health and HealthSouth joint venture company to apply for a Certificate of Need in HSA III. As healthcare services move into the future concentrating on population health, leadership at Novant Health and HealthSouth have determined that partnering HealthSouth's inpatient rehabilitation expertise with Novant Health's integrated system of physician practices, hospitals and outpatient centers would create a dynamic partnership to promote enhanced access, quality and safety for the patients we serve.

Currently, patients in the Novant Health system have difficulty gaining admission to the current inpatient rehabilitation provider in Mecklenburg, Gaston and Cabarrus counties in HSA III. Patient admissions are often delayed, or denied, and many patients end up receiving care in other settings which do not provide the same level of intensive rehabilitation with an experienced rehabilitation team. This petition, if approved, will help to alleviate issues concerning access and ensure that patients receive the appropriate level of post-acute care in a timely manner. In addition, this project will promote cost-effective approaches and enhance the overall quality of healthcare services offered to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval of this Petition.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Santosh Gopali', written over a horizontal line.

Santosh Gopali, MD
Medical Director, Novant Health Inpatient Physician Specialists
Novant Health Matthews Medical Center

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am an active member of the Medical Staff at Novant Health Presbyterian Medical Center, board-certified in Family Medicine. As you may be aware, in Mecklenburg County there is only one provider of inpatient rehabilitation services. In addition, in the eight counties of HSA III, one provider controls 95% of existing rehabilitation beds.

I have experienced delays in the admission of my patients to the existing inpatient rehabilitation center as a result of their high utilization. Also, some of my patients which meet rehabilitation admission criteria have been denied admission to the existing provider due to the facilities inability to meet the needs of my patient. As a result, some of my patients are not receiving needed inpatient rehabilitation services.

Novant Health, in partnership with HealthSouth is submitting an adjusted need determination for new rehabilitation beds in HSA III. I, and my colleagues, support the expansion of rehabilitation services in the Greater Charlotte Market. If approved, the Petition will increase access for patients currently denied timely care. This project will promote cost-effective approaches, expand access to health care services and encourage quality health care services by providing more efficient health care services to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval and this project.

Sincerely,



James W. Schaffer, M.D.
South Park Family Physicians
Novant Health, Inc.



Presbyterian Medical Center

200 Hawthorne Lane
Charlotte, NC 28204

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am the Stroke Program Coordinator at Novant Health Presbyterian Medical Center. As you may be aware, in Mecklenburg County there is only one provider of inpatient rehabilitation services. In addition, in the eight counties of HSA III, one provider controls 95% of existing rehabilitation beds.

As a Stroke Coordinator, I have often witnessed extended delays in the admission of NHPMC patients to the existing inpatient rehabilitation center as a result of their high utilization, admission criteria or pending payor source. In many cases, these patients have prolonged inpatient stays at higher cost and with less potential to achieve their optimal recovery. As a result, they are at increased risk for readmission and increased, lifelong disability.

Novant Health, in partnership with HealthSouth is submitting an adjusted need determination for new rehabilitation beds in HSA III. I, and my colleagues, support the expansion of rehabilitation services in the Greater Charlotte Market. If approved, the Petition will increase access for patients currently denied timely care. This project will promote cost-effective approaches, expand access to health care services and encourage quality health care services by providing more efficient health care services to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval and this project.

Sincerely,

Denise Sorenson, BSN
Regional Stroke Coordinator
Novant Health Greater Charlotte Market



Presbyterian Medical Center
200 Hawthorne Lane
Charlotte, NC 28204

July 25, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am a case management leader at Novant Health Presbyterian Medical Center. As you may be aware, in Mecklenburg County there is only one provider of inpatient rehabilitation services. In addition, in the eight counties of HSA III, one provider controls 95% of existing rehabilitation beds.

As a case management leader, I have often experienced long delays in the admission of my patients to the existing inpatient rehabilitation center as a result of their high utilization. Further, it is not unusual for my patients, that meet rehabilitation admission criteria, to be denied admission to the existing provider due to the facilities inability to meet the needs of my patient. As a result, many of my patients are not receiving needed inpatient rehabilitation services.

Novant Health, in partnership with HealthSouth is submitting an adjusted need determination for new rehabilitation beds in HSA III. I, and my colleagues, support the expansion of rehabilitation services in the Greater Charlotte Market. If approved, the Petition will increase access for patients currently denied timely care. This project will promote cost-effective approaches, expand access to health care services and encourage quality health care services by providing more efficient health care services to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval and this project.

Sincerely,

Stacy Wright, LCSW, ACM, MBA

Stacy Wright
Novant Health Case Management



Matthews Medical Center
1500 Matthews Township Parkway
Matthews, NC 28078

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Inpatient Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am a case manager at Novant Health Presbyterian Medical Center. As you may be aware, in Mecklenburg County there is only one provider of inpatient rehabilitation services. In addition, in the eight counties of HSA III, one provider controls 95% of existing rehabilitation beds.

As a case manager, I have often experienced long delays in the admission of my patients to the existing inpatient rehabilitation center as a result of their high utilization. Further, it is not unusual for my patients, that meet rehabilitation admission criteria, to be denied admission to the existing provider due to the facilities inability to meet the needs of my patient. As a result, many of my patients are not receiving needed inpatient rehabilitation services.

Novant Health, in partnership with HealthSouth is submitting an adjusted need determination for new rehabilitation beds in HSA III. I, and my colleagues, support the expansion of rehabilitation services in the Greater Charlotte Market. If approved, the Petition will increase access for patients currently denied timely care. This project will promote cost-effective approaches, expand access to health care services and encourage quality health care services by providing more efficient health care services to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval and this project.

Sincerely,

A handwritten signature in black ink that reads 'Shanthi Iyer'.

Shanthi Iyer, MSW, ACSW
Supervisor, Case Management
Novant Health Matthews Medical Center



July 26, 2017

Presbyterian Medical Center

200 Hawthorne Lane
Charlotte, NC 28204

NovantHealth.org

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am the current Chief Nursing Officer at Novant Health Presbyterian Medical Center. As you may be aware, in Mecklenburg County there is only one provider of inpatient rehabilitation services. In addition, in the eight counties of HSA III, one provider controls 95% of existing rehabilitation beds.

As the nursing representative for our facility, it is my responsibility to ensure that our patients have access to the appropriate level of care as they navigate their complex and often times difficult journey to recovery. We are proud to be established as the only Comprehensive Stroke Center in HSA III and see the lack of rehabilitation beds within our facility as a gap in the aforementioned journey for our patients. Often times, it is difficult for our nursing team to communicate the importance of rehabilitation given that we don't have the services to introduce to them at the bedside. As a result, many of our patients do not prioritize rehabilitation and are often lost in the referral process to non-Novant Health facilities.

Novant Health, in partnership with HealthSouth is submitting an adjusted need determination for new rehabilitation beds in HSA III. I, and my colleagues, support the expansion of rehabilitation services in the Greater Charlotte Market. If approved, the Petition will increase access for patients currently denied timely care. This project will promote cost-effective approaches, expand access to health care services and encourage quality health care services by providing more efficient health care services to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval and this project.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kelli Sadler'.

Kelli Sadler, MHA, BSN, RN
VP- Chief Nursing Officer
Novant Health Presbyterian Medical Center
Novant Health Charlotte Orthopedic Hospital



Matthews Medical Center
1500 Matthews Township Parkway
Matthews, NC 28078

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Inpatient Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am Chief Nursing Officer, Novant Health Matthews Medical Center (NHMMC). In my role as NHMMC CNO, I am writing to express my support and the support of my colleagues at NHMMC for the Petition being filed by Novant Health and HealthSouth for an Adjusted Need Determination for additional inpatient rehabilitation beds in HSA III. If approved, the Petition would allow for the development of a new inpatient rehabilitation facility and provider in the Greater Charlotte Market which will increase access for patients at NHMMC currently denied timely care.

The Petition being submitted for additional inpatient rehabilitation beds will allow an opportunity for a Novant Health and HealthSouth joint venture company to apply for a Certificate of Need in HSA III. As healthcare services move into the future concentrating on population health, leadership at Novant Health and HealthSouth have determined that partnering HealthSouth's inpatient rehabilitation expertise with Novant Health's integrated system of physician practices, hospitals and outpatient centers would create a dynamic partnership to promote enhanced access, quality and safety for the patients we serve.

Currently, patients in the Novant Health system have difficulty gaining admission to the current inpatient rehabilitation provider in Mecklenburg, Gaston and Cabarrus counties in HSA III. Patient admissions are often delayed, or denied, and many patients end up receiving care in other settings which do not provide the same level of intensive rehabilitation with an experienced rehabilitation team. This petition, if approved, will help to alleviate issues concerning access and ensure that patients receive the appropriate level of post-acute care in a timely manner. In addition, this project will promote cost-effective approaches and enhance the overall quality of healthcare services offered to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval of this Petition.

Sincerely,

A handwritten signature in blue ink that reads "Tracy B. Forster".

Tracy B. Forster, RNH, BSN, MHA
Chief Nursing Officer
Novant Health Matthews Medical Center



Rehabilitation Center
3333 Silas Creek Parkway
Winston-Salem, NC 27103

novanthealth.org

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Inpatient Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am the Senior Director of Rehabilitation at Novant Health Forsyth Medical Center. In my role as Senior Director of Rehabilitation for Novant Health, I am writing to express my support and the support of my colleagues in Rehabilitation Services at Novant Health facilities for the Petition being filed by Novant Health and Health South for an Adjusted Need Determination for additional inpatient rehabilitation beds in HSA III. If approved, the Petition would allow for the development of a new inpatient rehabilitation facility and provider in the Great Charlotte Market which will increase access for Novant Health patients currently denied timely care.

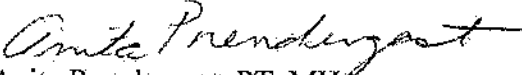
The Petition being submitted by Novant Health and HealthSouth for additional inpatient rehabilitation beds in HSA III will allow an opportunity for a Novant Health, Inc. and HealthSouth, Inc. joint venture company to apply for a Certificate of Need in HSA III. As healthcare services move into the future concentrating on population health, leadership at Novant Health and HealthSouth determined that partnering our inpatient rehabilitation expertise with Novant Health's integrated system of physician practices, hospitals, outpatient centers, and more - each element committed to delivering a remarkable healthcare experience for patients - was a good match for the future of inpatient rehabilitation services for Novant Health. Currently, patients in the Novant Health system have difficulty gaining admission to the current inpatient rehabilitation provider in Mecklenburg, Gaston and Cabarrus counties in HSA III. Patient admissions are often delayed, or denied, and many patients end up receiving care in other settings which do not provide the same level of intensive rehabilitation with an experienced rehabilitation team.

Novant Health, in partnership with HealthSouth is submitting a Petition for an adjusted need determination for additional rehabilitation beds in HSA III. I, and my colleagues, support the expansion of rehabilitation services in the Greater Charlotte Market. If approved, the Petition

would allow for the development of a new inpatient rehabilitation facility and provider in the Great Charlotte Market which will increase access for patients currently denied timely care. This project will promote cost-effective approaches, expand access to health care services and encourage quality health care services by providing more efficient health care services to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval and this Petition.

Sincerely,


Anita Prendergast, PT, MHA
Senior Director
Novant Health Rehabilitation



July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Inpatient Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am the Area CEO for North Carolina and South Carolina HealthSouth inpatient rehabilitation facilities. I am based at HealthSouth Rehabilitation Hospital of Rock Hill in Rock Hill, SC. This facility has 50 inpatient rehabilitation beds.

In my role as Area CEO, I am writing to express my support and the support of my colleagues for the Petition being filed by Novant Health and Health South for an Adjusted Need Determination for additional inpatient rehabilitation beds in HSA III. If approved, the Petition would allow for the development of a new inpatient rehabilitation hospital and provider in the Greater Charlotte Market which will increase access for Novant Health patients currently denied timely care. Rock Hill, SC is considered part of the Greater Charlotte Metropolitan Area.

As an inpatient rehabilitation provider in the market we strongly support the development of additional providers in HSA III. Current inpatient rehabilitation facilities in Mecklenburg County are very highly utilized and providers are having difficulty finding an inpatient rehabilitation bed close to home for their patients in a timely manner.

The Petition being submitted by Novant Health and HealthSouth for additional inpatient rehabilitation beds in HSA III will allow an opportunity for a Novant Health and HealthSouth joint venture company to apply for a Certificate of Need in HSA III. As healthcare services move into the future concentrating on population health, leadership at Novant Health and HealthSouth determined that partnering our inpatient rehabilitation expertise with Novant Health 's integrated system of physician practices, hospitals, outpatient centers, and more - each element committed to delivering a remarkable healthcare experience for patients - was a good match for the future of inpatient rehabilitation services for Novant Health. Currently, patients in the Novant Health system have difficulty gaining admission to the current inpatient rehabilitation provider in



Mecklenburg, Gaston and Cabarrus counties in HSA III. Patient admissions are often delayed, or denied, and many patients end up receiving care in other settings which do not provide the same level of intensive rehabilitation with an experienced rehabilitation team.

Novant Health, in partnership with HealthSouth is submitting a Petition for an adjusted need determination for additional rehabilitation beds in HSA III. I, and my colleagues, support the expansion of rehabilitation services in the Greater Charlotte Market. If approved, the Petition would allow for the development of a new inpatient rehabilitation hospital and provider in the Greater Charlotte Market which will increase access for patients currently denied timely care. This project will promote cost-effective approaches, expand access to health care services and encourage quality health care services by providing more efficient health care services to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval and this Petition.

Sincerely,

A handwritten signature in blue ink that reads "Deanna Martin".

Deanna Martin, RN, MSN, MBA
Area CEO
HealthSouth



Elissa Charbonneau, DO, MS
Chief Medical Officer

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Inpatient Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am the Chief Medical Officer for HealthSouth Corporation. I am writing to express my support and the support of my colleagues at HealthSouth for the Petition for an Adjusted Need Determination for additional inpatient rehabilitation beds in HSA III being submitted by Novant Health and HealthSouth.

In my role as Chief Medical Officer for HealthSouth, I oversee the medical services, quality initiatives and patient satisfaction for all of HealthSouth's inpatient rehabilitation hospitals located in 30 states and Puerto Rico. I currently am working with the clinical team at Novant Health Rehabilitation Hospital of Winston-Salem as they develop their replacement inpatient rehabilitation hospital which received CON approval last year.

HealthSouth offers a wide range of specialized clinical programs and services. Intensive rehabilitation can speed recovery. HealthSouth therapy is significantly more intensive than the average therapy program offered by skilled nursing facilities in that patients at HealthSouth hospitals receive therapy a minimum of three hours a day, five days a week. Our hospitals also routinely provide care for patients with higher acuity than other inpatient rehabilitation facilities. HealthSouth inpatient rehabilitation hospitals offer state-of-the-art technology and equipment to promote patient recovery. Examples include *VitalStim*, which targets swallow function via electrical stimulation. Used with traditional dysphagia therapy, it provides Functional Electric Stimulation. The *Bioness* is used to help patients regain lost mobility for upper and lower extremities.

Quality initiatives at HealthSouth assure above average patient outcomes, with higher Functional Independence Measurement (FIM) scores at discharge and lower lengths of stay. Compared to skilled nursing facilities, HealthSouth patients have lower readmission rates to acute hospitals after discharge

3660 Grandview Parkway, Suite 200 • Birmingham, AL 35243
207 662-8228 • Fax 205 262-3775
lisa.charbonneau@healthsouth.com
healthsouth.com



in the 90 days post-discharge period. HealthSouth uses Press Ganey, one of the nation's leading healthcare research firms, to continually measure our patients' perception of their experience at our hospitals. With Press Ganey patient surveys, as well as other collected data, we are better able to evaluate our patient experience and help patients reach their goals for maximum independence.

Our priority is to deliver high quality patient care and our team of experts has extensive experience in today's most advanced therapeutic methods and technologies. To accomplish this, HealthSouth clinicians have specialized advanced training in rehabilitation in order to provide the best care to patients with catastrophic injuries and illnesses, such as spinal cord injury, stroke and brain injury. All of our patients are seen by physicians with training and experience in rehabilitation almost daily.

The Petition being submitted by Novant Health and HealthSouth for additional inpatient rehabilitation beds in HSA III will allow an opportunity for a Novant Health and HealthSouth joint venture company to apply for a Certificate of Need in HSA III. As healthcare services move into the future concentrating on population health, leadership at Novant Health and HealthSouth determined that partnering our inpatient rehabilitation expertise with Novant Health's integrated system of physician practices, hospitals, outpatient centers, and more - each element committed to delivering a remarkable healthcare experience for patients - was a good match for the future of inpatient rehabilitation services for Novant Health. Currently, patients in the Novant Health system have difficulty gaining admission to the current inpatient rehabilitation provider in Mecklenburg, Gaston and Cabarrus counties in HSA III. Patient admissions are often delayed, or denied, and many patients end up receiving care in other settings which do not provide the same level of intensive rehabilitation with an experienced rehabilitation team.

Because of the intensive nature of the inpatient rehabilitation services they provide, inpatient rehabilitation hospitals have the power to transform lives. Due to the high utilization of the existing inpatient rehabilitation services in HSA III, there are undoubtedly many patients in the service area who could benefit from inpatient rehabilitation care in a hospital setting who are not receiving it because there is not enough room. With the addition of a new modern facility, hopefully developed by a Novant Health/HealthSouth joint venture and managed by HealthSouth, many more patients will be able to return to productive lives. This Petition will also allow the development of a new hospital which will promote cost-effective approaches, expand health care services to the medically underserved, and encourage quality health care services by providing more efficient health care services to the patient population served by Novant Health.

Speaking from personal experience, I know firsthand how beneficial HealthSouth's joint venture hospitals are to the patients and communities they serve. From 2001 to early 2015, I served as medical director at New England Rehabilitation Hospital of Portland, Maine, a joint venture of Maine Medical Center and HealthSouth. During that time, a few notable achievements included the following:

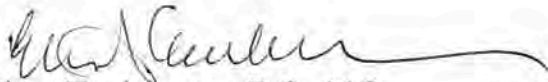
- Obtaining Disease Specific Certification from The Joint Commission in Stroke, Brain Injury, Hip fracture and Amputee rehabilitation;
- Establishing a comprehensive stroke rehabilitation pathway with our neurologist colleagues, which is now regarded as the best in the State of Maine;

- Coordinating a pre and post-operative pathway for amputee patients which resulted in our becoming the preferred provider for vascular and orthopaedic surgeons for rehabilitation for these patients;
- Consistently achieving the highest quartile ranking in patient satisfaction with their physicians;
- Partnering with our joint venture colleague to create a yearly multidisciplinary stroke conference, attended by clinicians from all over the state; and
- Establishing teaching opportunities by joining the faculty of the geriatric fellowship program that was started at Maine Medical Center, and supervising the fellows for their three-month rehabilitation rotation, as well as establishing elective rotations for medical students and residents in rehabilitation medicine.

Novant Health, in partnership with HealthSouth is submitting an adjusted need determination for additional rehabilitation beds in HSA III. I, and my colleagues, support the expansion of rehabilitation services in the Greater Charlotte Market. If approved, the Petition would allow for the development of a new inpatient rehabilitation hospital and provider in the Great Charlotte Market which will increase access for patients currently denied timely care. This project will promote cost-effective approaches, expand access to health care services and encourage quality health care services by providing more efficient health care services to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval of this Petition.

Sincerely,



Elissa Charbonneau, D.O., M.S
Diplomate, American Board of Physical Medicine and Rehabilitation
Associate Professor, Tufts Medical School, Department of Physical Medicine and Rehabilitation
Chief Medical Officer, HealthSouth Corporation



Rowan Medical Center
612 Mocksville Avenue
Salisbury, NC 28144

NovantHealth.org

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Inpatient Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am an active member of the Medical Staff at Novant Health Rowan Medical Center, board-certified in Physical Medicine and Rehabilitation. Physical Medicine and Rehabilitation. As you may be aware, in Mecklenburg County there is only one provider of inpatient rehabilitation services. In addition, in the eight counties of HSA III, the same provider controls 95% of existing rehabilitation beds. NHRMC operates the remaining 5% of inpatient rehabilitation beds in The Stanback Rehabilitation Center, a 10-bed inpatient rehabilitation unit.

I am writing to express my support and the support of my colleagues at NHRMC for the Petition being filed by Novant Health and Health South for an Adjusted Need Determination for additional inpatient rehabilitation beds in HSA III. If approved, the Petition would allow for the development of a new inpatient rehabilitation facility and provider in the Great Charlotte Market which will increase access for patients in Mecklenburg County currently denied timely care.

While some of our patients come from Mecklenburg County, we have found that providing inpatient rehabilitation services to patients close to home and family is more beneficial for patients. We believe that having additional inpatient rehabilitation beds in HSA III will strengthen all existing providers and will be beneficial to those in our communities.

The Petition being submitted for additional inpatient rehabilitation beds will allow an opportunity for a Novant Health and HealthSouth joint venture company to apply for a Certificate of Need in HSA III. As healthcare services move into the future concentrating on population health, leadership at Novant Health and HealthSouth have determined that partnering HealthSouth's inpatient rehabilitation expertise with Novant Health's integrated system of physician practices, hospitals, and outpatient centers would create a dynamic partnership to promote enhanced access, quality and safety for the patients we serve.

Currently, patients in the Novant Health system have difficulty gaining admission to the current inpatient rehabilitation provider in Mecklenburg, Gaston and Cabarrus counties in HSA III. Patient admissions are often delayed, or denied, and many patients end up receiving care in other settings which do not provide the same level of intensive rehabilitation with an experienced rehabilitation team. This petition, if approved, will help to alleviate issues concerning access and ensure that patients receive the appropriate level of post-acute care in a timely manner. In addition, this project will promote cost-effective approaches and enhance the overall quality of healthcare services offered to the residents of Mecklenburg County and surrounding areas.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval of this Petition.

Sincerely,



Jedediah D Robinson, MD
Novant Health and Sports Medicine – Salisbury
Physical Medicine and Rehabilitation



Rowan Medical Center

612 Mocksville Avenue
Salisbury, NC 28144

NovantHealth.org

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Inpatient Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am President and Chief Operating Officer, Novant Health Rowan Medical Center (NHRMC). In my role as NHRMC President, I am writing to express my support and the support of my colleagues at NHRMC for the Petition being filed by Novant Health and HealthSouth for an Adjusted Need Determination for additional inpatient rehabilitation beds in HSA III. If approved, the Petition would allow for the development of a new inpatient rehabilitation facility and provider in the Greater Charlotte Market which will increase access for patients in Mecklenburg County currently denied timely care.

While some of our patients come from Mecklenburg County, we have found that providing inpatient rehabilitation services to patients close to home and family is more beneficial for patients. We believe that having additional inpatient rehabilitation beds in HSA III will strengthen all existing providers and will be beneficial to those in our communities.

The Stanback Rehabilitation Center at Novant Health Rowan Medical Center (Stanback Center) is Novant Health's only inpatient rehabilitation unit in HSA III. The Stanback Center is a small unit with only 10 beds. We provide high quality services to our patients, over 80% of whom are from Rowan County. In the last year, utilization in our ten beds has increased 9%. Outcome data and functional independence measure (FIM) scores are above average for patients treated at the Stanback Center. However, the Stanback Center does not have all the resources and tools available in a 50-bed inpatient rehabilitation hospital to meet the needs of all types of rehabilitation patients. The Stanback Center is over an hour away, in good traffic, for most residents of HSA III in Mecklenburg, Cabarrus, Union, Gaston and Iredell Counties; therefore, it is not the most effective alternative to meeting the needs of HSA III residents identified in this Petition.

The Petition being submitted for additional inpatient rehabilitation beds will allow an opportunity for a Novant Health and HealthSouth joint venture company to apply for a Certificate of Need in HSA III. As healthcare services move into the future concentrating on population health, leadership at Novant Health and HealthSouth have determined that partnering HealthSouth's inpatient rehabilitation expertise with Novant Health's integrated system of physician practices, hospitals and outpatient centers would create a dynamic partnership to promote enhanced access, quality and safety for the patients we serve.

Currently, patients in the Novant Health system have difficulty gaining admission to the current inpatient rehabilitation provider in Mecklenburg, Gaston and Cabarrus counties in HSA III. Patient admissions for our colleagues in Mecklenburg County are often delayed, or denied, and many patients end up receiving care in other settings which do not provide the same level of intensive rehabilitation with an experienced rehabilitation team. This petition, if approved, will help to alleviate issues concerning access and ensure that patients receive the appropriate level of post-acute care in a timely manner. In addition, this project will promote cost-effective approaches and enhance the overall quality of healthcare services offered to the residents of HSA III.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval of this Petition.

Sincerely,



Darise Caldwell
President and Chief Operating Officer
Novant Health Rowan Medical Center



Novant Medical Group
108 Providence Road, Suite 3
Charlotte, NC 28207

T 704-384-9113
novanthealth.org

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Inpatient Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am Senior Vice President of Novant Health and President of the Novant Health Greater Charlotte Market. In my role as President of the Greater Charlotte Market, I am writing to express my support and the support of my colleagues at Novant Health for the Petition being filed by Novant Health and HealthSouth for an Adjusted Need Determination for additional inpatient rehabilitation beds in HSA III. If approved, the Petition would allow for the development of a new inpatient rehabilitation facility and provider in the Greater Charlotte Market which will increase access for Novant Health patients currently denied timely care.

The Petition being submitted for additional inpatient rehabilitation beds will allow an opportunity for a Novant Health and HealthSouth joint venture company to apply for a Certificate of Need in HSA III. As healthcare services move into the future concentrating on population health, leadership at Novant Health and HealthSouth have determined that partnering HealthSouth's inpatient rehabilitation expertise with Novant Health's integrated system of physician practices, hospitals, and outpatient centers would create a dynamic partnership to promote enhanced access, quality and safety for the patients we serve.

Currently, patients in the Novant Health system have difficulty gaining admission to the current inpatient rehabilitation provider in Mecklenburg, Gaston and Cabarrus counties in HSA III. Patient admissions are often delayed, or denied, and many patients end up receiving care in other settings which do not provide the same level of intensive rehabilitation with an experienced rehabilitation team. This petition, if approved, will help to alleviate issues concerning access and ensure that patients receive the appropriate level of post-acute care in a timely manner. In

addition, this project will promote cost-effective approaches and enhance the overall quality of healthcare services offered to the residents of Mecklenburg County and surrounding areas.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval of this Petition.

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Mueller". The signature is fluid and cursive, with a large initial "A" and "M".

Andy Mueller, MD

Senior Vice President Novant Health

President of the Novant Health Greater Charlotte Market



108 Providence Road
Charlotte, NC 28207

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Inpatient Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am Senior Vice President of Acute Care Services for Novant Health. In my role, I oversee rehabilitation services across Novant Health with the system-wide director of rehabilitation services reporting to me. I am writing to express my support and the support of my colleagues at Novant Health for the Petition being filed by Novant Health and HealthSouth for an Adjusted Need Determination for additional inpatient rehabilitation beds in HSA III. If approved, the Petition would allow for the development of a new inpatient rehabilitation facility and provider in the Greater Charlotte Market which will increase access for Novant Health patients currently denied timely care.

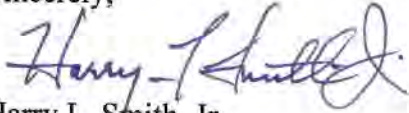
The Petition being submitted for additional inpatient rehabilitation beds will allow an opportunity for a Novant Health and HealthSouth joint venture company to apply for a Certificate of Need in HSA III. As healthcare services move into the future concentrating on population health, leadership at Novant Health and HealthSouth have determined that partnering HealthSouth's inpatient rehabilitation expertise with Novant Health's integrated system of physician practices, hospitals, and outpatient centers would create a dynamic partnership to promote enhanced access, quality and safety for the patients we serve.

Currently, patients in the Novant Health system have difficulty gaining admission to the current inpatient rehabilitation provider in Mecklenburg, Gaston and Cabarrus counties in HSA III. Patient admissions are often delayed, or denied, and many patients end up receiving care in other settings which do not provide the same level of intensive rehabilitation with an experienced rehabilitation team. This petition, if approved, will help to alleviate issues concerning access and ensure that patients receive the appropriate

approaches and enhance the overall quality of healthcare services offered to the residents of Mecklenburg County and surrounding areas.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval of this Petition.

Sincerely,

A handwritten signature in blue ink that reads "Harry L. Smith, Jr." with a stylized flourish at the end.

Harry L. Smith, Jr.
Senior Vice President of Acute Care Services
Novant Health



Presbyterian Medical Center

200 Hawthorne Lane
Charlotte, NC 28204

novanthealth.org

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Inpatient Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am President and Chief Operating Officer, Novant Health Presbyterian Medical Center (NHPMC). In my role as NHPMC President, I am writing to express my support, and the support of my colleagues at NHPMC, for the Petition being filed by Novant Health and HealthSouth for an Adjusted Need Determination for additional inpatient rehabilitation beds in HSA III. If approved, the Petition would allow for the development of a new inpatient rehabilitation facility and provider in the Greater Charlotte Market, which will increase access for patients at NHPMC currently denied timely care.

The Petition being submitted for additional inpatient rehabilitation beds will allow an opportunity for a Novant Health and HealthSouth joint venture company to apply for a Certificate of Need in HSA III. As healthcare services move into the future concentrating on population health, leadership at Novant Health and HealthSouth have determined that partnering HealthSouth's inpatient rehabilitation expertise with Novant Health's integrated system of physician practices, hospitals, and outpatient centers would create a dynamic partnership to promote enhanced access, quality and safety for the patients we serve.

Currently, patients in the Novant Health system have difficulty gaining admission to the current inpatient rehabilitation provider in Mecklenburg, Gaston and Cabarrus counties in HSA III. Patient admissions are often delayed, or denied, and many patients end up receiving care in other settings which do not provide the same level of intensive rehabilitation with an experienced rehabilitation team. This petition, if approved, will help to alleviate issues concerning access and ensure that patients receive the appropriate level of post-acute care in a timely manner. In

addition, this project will promote cost-effective approaches and enhance the overall quality of healthcare services offered to the residents of Mecklenburg County and surrounding areas.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval of this Petition.

Sincerely,



Paula Vincent, RN
President and Chief Operating Officer
Novant Health Presbyterian Medical Center

7/26/2017

HEALTHSOUTH

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Inpatient Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am President of the MidAtlantic Region of HealthSouth Corporation. I am writing to express my support and the support of my team in the MidAtlantic Region at HealthSouth for the Petition being filed by Novant Health and HealthSouth for an Adjusted Need Determination for additional inpatient rehabilitation beds in HSA III. If approved, the Petition would allow for the development of a new inpatient rehabilitation hospital and provider in the Greater Charlotte Market which will increase access for patients currently denied timely care.

HealthSouth is one of the nation's largest providers of post-acute healthcare services. The MidAtlantic Region currently includes nineteen HealthSouth inpatient rehabilitation facilities in East Tennessee, Maryland, South Carolina, Virginia and West Virginia. Some of these are joint venture hospitals with not-for-profit partners. The Novant Health Rehabilitation Hospital of Winston-Salem, LLC, which received CON approval last year, is now under construction. This will be HealthSouth's first joint venture in North Carolina and will be part of the MidAtlantic Region. In addition to its ownership, HealthSouth will provide management services to Novant Health Rehabilitation Hospital of Winston-Salem.

HealthSouth's priority is to deliver high quality patient care and our team of experts has extensive experience in today's most advanced therapeutic methods and technologies. HealthSouth leads the way, consistently outperforming peers with a unique, intensive approach to rehabilitation, returning patients to full strength in less than average time. At HealthSouth, we continually strive for excellence in all that we do, partnering with every patient to find a treatment plan that works for them and partnering with acute care providers to provide the highest quality care available for rehabilitation services. As healthcare services move into the future concentrating on population health, leadership at Novant Health and HealthSouth determined that partnering our inpatient rehabilitation expertise with Novant Health's integrated system of physician practices, hospitals, outpatient centers, and more - each element committed

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205 967-7116 • Fax 205 262-8708

www.healthsouth.com

HLS
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NYSE

to delivering a remarkable healthcare experience for patients - was a good match for the future of inpatient rehabilitation services for Novant Health.

Novant Health, in partnership with HealthSouth is submitting an adjusted need determination for new rehabilitation beds in HSA III. My colleagues and I support the expansion of rehabilitation services in the Greater Charlotte Market. If approved, the Petition would allow for the development of a new inpatient rehabilitation hospital and provider in the Greater Charlotte Market which will increase access for patients currently denied timely care. This project will promote cost-effective approaches, expand access to health care services and encourage a higher quality of healthcare to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval of this Petition.

Sincerely,



Ed Mowen
President, MidAtlantic Region
HealthSouth Corporation



July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Inpatient Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am Chief Strategy and Development Officer of HealthSouth Corporation. In my role as Chief Strategy and Development Officer, I am writing to express my support and the support of my colleagues at HealthSouth for the Petition being filed by Novant Health and HealthSouth for an Adjusted Need Determination for additional inpatient rehabilitation beds in HSA III. If approved, the Petition would allow for the development of a new inpatient rehabilitation hospital and provider in the Greater Charlotte Market which will increase access for patients currently denied timely care.

HealthSouth is one of the nation's largest providers of post-acute healthcare services. Our priority is to deliver high quality patient care and our team of experts have extensive experience in today's most advanced therapeutic methods and technologies. HealthSouth leads the way, consistently outperforming peers with a unique, intensive approach to rehabilitation, returning patients to full strength in less than average time. At HealthSouth, we continually strive for excellence in all that we do, partnering with every patient to find a treatment plan that works for them and partnering with acute care providers to provide the highest quality care available for rehabilitation services.

The Petition being submitted by Novant Health and HealthSouth for additional inpatient rehabilitation beds in HSA III will allow an opportunity for a Novant Health and HealthSouth joint venture company to apply for a Certificate of Need in HSA III. As healthcare services move into the future concentrating on population health, leadership at Novant Health and HealthSouth determined that partnering our inpatient rehabilitation expertise with Novant Health's integrated system of physician practices, hospitals, outpatient centers, and more - each element committed to delivering a remarkable healthcare experience for patients - was a good match for the future of inpatient rehabilitation services for Novant Health. Currently, patients in the Novant Health system have difficulty gaining admission to the current inpatient rehabilitation provider in

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205 967-7116 • Fax 205 262-8708
www.healthsouth.com



Mecklenburg, Gaston and Cabarrus counties in HSA III. Patient admissions are often delayed, or denied, and many patients end up receiving care in other settings which do not provide the same level of intensive rehabilitation with an experienced rehabilitation team.

Novant Health, in partnership with HealthSouth is submitting a Petition for an adjusted need determination for additional rehabilitation beds in HSA III. I, and my colleagues, support the expansion of rehabilitation services in the Greater Charlotte Market. If approved, the Petition would allow for the development of a new inpatient rehabilitation hospital and provider in the Greater Charlotte Market which will increase access for patients currently denied timely care. This project will promote cost-effective approaches, expand access to health care services and encourage a higher quality of health care for the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval of this Petition.

Sincerely,

A handwritten signature in blue ink that reads "David Klementz". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

David Klementz
Chief Strategy and Development Officer
HealthSouth Corporation



Mathews Medical Center
1500 Mathews Township Parkway
Mathews, NC 28078

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Inpatient Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am President and Chief Operating Officer, Novant Health Mathews Medical Center (NHMMC). In my role as NHMMC President, I am writing to express my support and the support of my colleagues at NHMMC for the Petition being filed by Novant Health and HealthSouth for an Adjusted Need Determination for additional inpatient rehabilitation beds in HSA III. If approved, the Petition would allow for the development of a new inpatient rehabilitation facility and provider in the Greater Charlotte Market which will increase access for patients at NHMMC currently denied timely care.

The Petition being submitted for additional inpatient rehabilitation beds will allow an opportunity for a Novant Health and HealthSouth joint venture company to apply for a Certificate of Need in HSA III. As healthcare services move into the future concentrating on population health, leadership at Novant Health and HealthSouth have determined that partnering HealthSouth's inpatient rehabilitation expertise with Novant Health's integrated system of physician practices, hospitals and outpatient centers would create a dynamic partnership to promote enhanced access, quality and safety for the patients we serve.

Currently, patients in the Novant Health system have difficulty gaining admission to the current inpatient rehabilitation provider in Mecklenburg, Gaston and Cabarrus counties in HSA III. Patient admissions are often delayed, or denied, and many patients end up receiving care in other settings which do not provide the same level of intensive rehabilitation with an experienced rehabilitation team. This petition, if approved, will help to alleviate issues concerning access and ensure that patients receive the appropriate level of post-acute care in a timely manner. In addition, this project will promote cost-effective approaches and enhance the overall quality of healthcare services offered to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval of this Petition.

Sincerely,

A handwritten signature in blue ink that reads "Roland Bibeau".

Roland Bibeau
President and Chief Operating Officer
Novant Health Mathews Medical Center



Huntersville Medical Center
10030 Gilead Road
Huntersville, NC 28078

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Inpatient Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am President and Chief Operating Officer, Novant Health Huntersville Medical Center (NHHMC). In my role as NHHMC President, I am writing to express my support and the support of my colleagues at NHHMC for the Petition being filed by Novant Health and HealthSouth for an Adjusted Need Determination for additional inpatient rehabilitation beds in HSA III. If approved, the Petition would allow for the development of a new inpatient rehabilitation facility and provider in the Greater Charlotte Market which will increase access for patients at NHHMC currently denied timely care.

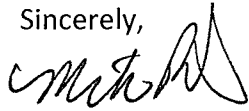
The Petition being submitted for additional inpatient rehabilitation beds will allow an opportunity for a Novant Health and HealthSouth joint venture company to apply for a Certificate of Need in HSA III. As healthcare services move into the future concentrating on population health, leadership at Novant Health and HealthSouth have determined that partnering HealthSouth's inpatient rehabilitation expertise with Novant Health's integrated system of physician practices, hospitals and outpatient centers would create a dynamic partnership to promote enhanced access, quality and safety for the patients we serve.

Currently, patients in the Novant Health system have difficulty gaining admission to the current inpatient rehabilitation provider in Mecklenburg, Gaston and Cabarrus counties in HSA III. Patient admissions are often delayed, or denied, and many patients end up receiving care in other settings which do not provide the same level of intensive rehabilitation with an experienced rehabilitation team. This petition, if approved, will help to alleviate issues concerning access and ensure that patients receive the appropriate level of post-acute care in a timely manner. In addition, this project will promote cost-effective approaches and enhance

the overall quality of healthcare services offered to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval of this Petition.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mike Riley', written in a cursive style.

Mike Riley
President and Chief Operating Officer
Novant Health Huntersville Medical Center



Charlotte Orthopedic Hospital

1901 Randolph Road
Charlotte, NC 28207

July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Inpatient Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am Vice President, Novant Health Charlotte Orthopedic Hospital (NHCOH). In this role, I am writing to express my support and the support of my colleagues at NHCOH for the Petition being filed by Novant Health and Health South for an Adjusted Need Determination for additional inpatient rehabilitation beds in HSA III. If approved, the Petition would allow for the development of a new inpatient rehabilitation facility and provider in the Great Charlotte Market which will increase access for patients at Novant Health facilities currently denied timely care.

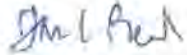
The Petition being submitted by Novant Health and HealthSouth for additional inpatient rehabilitation beds in HSA III will allow an opportunity for a Novant Health, Inc. and HealthSouth, Inc. joint venture company to apply for a Certificate of Need in HSA III. As healthcare services move into the future concentrating on population health, leadership at Novant Health and HealthSouth determined that partnering our inpatient rehabilitation expertise with Novant Health's integrated system of physician practices, hospitals, outpatient centers, and more - each element committed to delivering a remarkable healthcare experience for patients - was a good match for the future of inpatient rehabilitation services for Novant Health. Currently, patients in the Novant Health system have difficulty gaining admission to the current inpatient rehabilitation provider in Mecklenburg, Gaston and Cabarrus counties in HSA III. Patient admissions are often delayed, or denied, and many patients end up receiving care in other settings which do not provide the same level of intensive rehabilitation with an experienced rehabilitation team.

Novant Health, in partnership with HealthSouth is submitting a Petition for an adjusted need determination for additional rehabilitation beds in HSA III. I, and my colleagues, support the expansion of rehabilitation services in the Greater Charlotte Market. If approved, the Petition would allow for the development of a new inpatient rehabilitation facility and provider in the

Great Charlotte Market which will increase access for patients currently denied timely care. This project will promote cost-effective approaches, expand access to health care services and encourage quality health care services by providing more efficient health care services to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval and this Petition.

Sincerely,



Jason L. Bernd,
Vice President
Novant Health Charlotte Orthopedic Hospital