



- CarolinaEast Medical Center
- CarolinaEast Diagnostic Center
- CarolinaEast Surgery Center
- CarolinaEast Rehabilitation Hospital
- CarolinaEast Heart Center
- CarolinaEast Urology Center
- CarolinaEast Internal Medicine
- CarolinaEast Pediatrics
- CarolinaEast Gastroenterology
- CarolinaEast Cardiac, Thoracic & Vascular Surgery
- CarolinaEast Ear, Nose & Throat
- CarolinaEast Radiation Oncology
- CarolinaEast Physical Medicine & Rehabilitation
- CarolinaEast Home Care
- CarolinaEast Foundation
- CarolinaEast Wound Healing & Hyperbaric Services
- Crossroads Mental Health

Christopher Ullrich, M.D., SHCC Chair
 Sandra Green, DPH, Acute Care Service Committee Chair
 North Carolina State Health Coordinating Council
 c/o Medical Facilities Planning Section
 Division of Health Services Regulation
 2714 Mail Service Center
 Raleigh, NC 27699-2714

August 10, 2017

Re: Comments Regarding Wilmington Health, PLLC Petition for Requested Need Adjustment for 2 Additional Operating Rooms in Onslow County

Dear Dr. Ullrich and Dr. Green,

I am writing regarding the petition to add two additional operating rooms in Onslow County in the 2018 State Medical Facilities Plan. We are opposed to this request on several levels.

The Draft 2018 State Medical Facilities Plan has determined that there is a surplus of operating rooms in Onslow County. In fact, based on the current methodology there is a surplus of 3.30 operating rooms projected in 2020 in Onslow County. Based on everything that is believed to be true about why Certificate of Need exists, approving this petition would be a duplication of services.

In addition, the approval of the additional two operating rooms would certainly take business away from Onslow Memorial Hospital. In their petition, the Petitioner states, "Wilmington Health recognizes the need for Onslow Memorial Hospital to maintain its inventory of hospital-based operating rooms; the revenue from the surgical cases performed in those rooms helps to sustain the hospital, which is a safety net provider to the community. Onslow Memorial Hospital, like many others, faces ongoing challenges as healthcare evolves, including a phase-out of special payments for Tricare patients, which comprise a significant percentage of the hospital's patients. Wilmington Health recognizes that numerous factors contribute to the hospital's thin operating margins and has no desire to contribute to an additional erosion of revenue." The addition of two operating rooms in Onslow County would certainly decrease revenues for Onslow Memorial Hospital. Onslow Memorial is a sole community hospital and anything that could potentially jeopardize them should be avoided.

It is the opinion of CarolinaEast Health System that this petition should be denied.

Thank you for your time and attention to this matter.

Respectfully,

G. Raymond Leggett, III
President/CEO

Sent via email: DHSR.SMFP.Petitions-Comments@dhhs.nc.gov