

March 17, 2020

Christopher G. Ullrich, MD, Committee Chair
State Health Coordinating Committee

Martha Frisone, Chief
Amy Craddock, PhD, Assistant Chief
Healthcare Planning and Certificate of Need Section
Division of Health Service Regulation
2714 Mail Service Center
Raleigh, NC 27699-2714

RE: Support of Valleygate Dental Surgery Holdings, LLC's petition to include other medical surgeons in procedures at Dental Single Specialty Ambulatory Surgery Center Demonstration projects.

Dear Dr. Ullrich, Ms. Frisone, and Dr. Craddock,

I am writing to express support for Valleygate Dental Surgery Holdings, LLC's (Valleygate Holdings) petition to permit medical surgeons to participate in dental surgery at Dental Single Specialty Ambulatory Surgery Center Demonstration Projects ("Dental ASC"). I am a practicing pediatric dentist in Fayetteville, North Carolina. I serve patients from infancy through early adolescents as well as those with special needs through adulthood.

My patients receive routine evaluation of extraoral and intraoral structures to include the development of the face and jaws; hard and soft tissues; development of teeth as well as their relationship to each other within an arch as well as their relationship between both maxillary and mandibular arches; transition from primary to permanent dentitions; as well as evaluation of hard and soft tissue pathology to include dental caries. Of significant importance is the evaluation of the oropharyngeal complex.

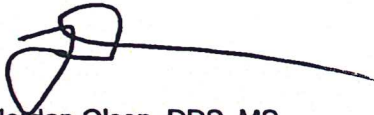
Often the presence of enlarged tonsils and adenoids as well as the symptoms of restless sleep and snoring are noted among our patients. Referral to primary care providers ("PCP") and/or ear nose and throat ("ENT") specialists are advised for airway evaluation under these circumstances. There are many times when dental treatment for an extremely anxious and fearful child is impossible with moderate conscious sedation because of prominent obstruction of tonsils and adenoids making treatment unsafe. For these children treatment must either be delayed until tonsils and adenoids can be removed, potentially leading to pain or progression of dental infection, or treatment must be completed under general anesthesia. Unfortunately for these children the underlying issues created by their airway obstruction of sleep apnea, labored breathing, poor oxygenation, and restless sleep still remain even after their dental treatment is completed under general anesthesia.

By utilizing a team approach of pediatric dentists, oral surgeons, and ENT specialists within the confines of a general anesthesia setting, significant dental disease is able to be remedied at the same time that obstructive soft tissues are able to be surgically addressed. This will not be possible for all children, not all children will suffer both of these conditions simultaneously. For those who do experience both conditions it is beneficial for all involved to address at the same time; patients, caregivers, surgical team, and the healthcare delivery system. Costs will be significantly lower, total care time will be minimized, and far fewer resources will be expended. With a team approach clinicians can discuss and make the best decisions for successful clinical outcomes for these patients. While their caution following the letter of rules is laudable, I urge the State Health Coordinating Council to interpret the rules so that, where team care is clinically indicated, appropriate specialists can join the dentists and oral surgeons to complete patient care in a single visit to the surgery center.

Every patient is unique, and not every case will qualify, but for those who do, the interpretation would represent substantial value.

I encourage the State Health Coordinating Council to approve this petition.

Thank you,

A handwritten signature in black ink, appearing to read 'Jordan Olsen', with a long horizontal line extending to the right.

Jordan Olsen, DDS, MS
Pediatric Dentist
Village Family Dental

March 17, 2020

Christopher G. Ullrich, MD, Committee Chair
State Health Coordinating Committee

Martha Frisone, Chief
Amy Craddock, PhD, Assistant Chief
Healthcare Planning and Certificate of Need Section
Division of Health Service Regulation
2714 Mail Service Center
Raleigh, NC 27699-2714

RE: Support for Valleygate Dental Surgery Holdings, LLC's Petition to include other medical surgeons in procedures at Dental Single Specialty Ambulatory Surgery Center Demonstration Projects

Dear Dr. Ullrich, Ms. Frisone, and Dr. Craddock,

I am writing to express support for Valleygate Dental Surgery Holdings, LLC's ("Valleygate Holdings") petition to permit medical surgeons to participate in dental surgery cases at Dental Single Specialty Ambulatory Surgery Center Demonstration Projects ("Dental ASC"). I am a practicing pediatric dentist in Fayetteville, North Carolina. My patients are children up to 13 years old.

Dental infections commonly involve bacteria that invade the pulp and spread to bone, neck, and other nearby soft tissue. These infections are potentially life threatening as they could result in fatal airway constriction. Similarly, enlarged tonsils also create significant airway obstruction leading to a myriad of symptoms that threaten a child's quality of life at a very early age. Some children may develop obstructive sleep apnea, snoring, labored breathing, mouth breathing, all of which are compromising their ability to be adequately oxygenated. Inadequate oxygenation then results in a child who has not had a good night's rest, is unable to pay attention in school and struggles to make good grades.

In many such cases, we can identify the problem and eliminate its source in a single surgical case, by engaging a team of specialists. When this is possible, everyone benefits – patients, caregivers, surgical team, and the health care delivery system. Costs are lower, total care time is less, and we use far fewer resources. In real time, clinicians working as a team can discuss options and make decisions that optimize patient care. The Valleygate Centers provide a unique setting that is organized around dental disease. While their caution following the letter of rules is laudable, I urge the State Health Coordinating Council to interpret the rules so that, where team care is clinically indicated, appropriate specialists can join the dentists and oral surgeons to complete patient care in a single visit to the surgery center.

Every patient is unique, and not every case will qualify, but for those who do, the interpretation would represent substantial value.

I encourage the State Health Coordinating Council to approve this petition.

Thank you,



Faith McGibbon, DDS
Pediatric Dentist
Village Family Dental



March 17, 2020

Christopher G. Ullrich, MD, Committee Chair
State Health Coordinating Committee

Martha Frisone, Chief
Amy Craddock, PhD, Assistant Chief
Healthcare Planning and Certificate of Need Section
Division of Health Service Regulation
2714 Mail Service Center
Raleigh, NC 27699-2714

RE: Support for Valleygate Dental Surgery Holdings, LLC's Petition to include other medical surgeons in procedures at Dental Single Specialty Ambulatory Surgery Center Demonstration Projects

Dear Dr. Ullrich, Ms. Frisone, and Dr. Craddock,

I am writing to express support for Valleygate Dental Surgery Holdings, LLC's ("Valleygate Holdings") petition to permit medical surgeons to participate in dental surgery cases at Dental Single Specialty Ambulatory Surgery Center Demonstration Projects ("Dental ASC"). I am a practicing pediatric dentist in Charlotte, North Carolina, and owner of Charlotte Pediatric Dentistry and Harrisburg Pediatric Dentistry, and collectively have 6 locations in Mecklenburg, Cabarrus, Gaston and Iredell Counties. My patients live in these counties and beyond to Lincoln, Cleveland, Stanley and Union Counties.

While I see many patients in the Valleygate Dental Surgery Center who require complex restorative dental treatment, another focus in my practice in dealing with the growth and development of children, which is profoundly affected by the child's ability to maintain a patent airway. Airway obstruction alters facial muscular tone and, therefore, the maxillary form and direction of mandibular growth. If there is no early intervention to correct, these facial defects will require significant surgical correction when the child reaches adulthood. With that said, I have had the great privilege to work in tandem with excellent surgeons who specialize in creating a proper oropharyngeal passage to allow normal facial growth, and we have found that a great time to treat these children is while they are undergoing dental surgery with general anesthesia. Both procedures can be completed with one sedation to the child.

When this is possible, everyone benefits – patients, caregivers, surgical team, and the health care delivery system. Costs are lower, total care time is less, and we use far fewer resources. In real time, clinicians working as a team can discuss options and make decisions that optimize patient care. The Valleygate Centers provide a unique setting that is organized around dental disease. While their caution following the letter of rules is laudable, I urge the State Health Coordinating Council to interpret the rules so that, where team care is clinically indicated, appropriate specialists can join the dentists and oral surgeons to complete patient care in a single visit to the surgery center.



Every patient is unique, and not every case will qualify, but for those who do, the interpretation would represent substantial value.

I encourage the State Health Coordinating Council to approve this petition.

Thank you for your time and consideration,

A handwritten signature in black ink, appearing to read 'D. H. Moore', with a long horizontal flourish extending to the right.

Dr. David H. Moore
Pediatric Dentist
Charlotte Pediatric Dentistry
david.moore009@gmail.com
704-604-4897



Date: 3/16/20

Christopher G. Ullrich, MD, Committee Chair
State Health Coordinating Committee

Martha Frisone, Chief
Amy Craddock, PhD, Assistant Chief
Healthcare Planning and Certificate of Need Section
Division of Health Service Regulation
2714 Mail Service Center
Raleigh, NC 27699-2714

RE: Support for Valleygate Dental Surgery Holdings, LLC's Petition to include other medical surgeons in procedures at Dental Single Specialty Ambulatory Surgery Center Demonstration Projects

Dear Dr. Ullrich, Ms. Frisone, and Dr. Craddock,

I am writing to express support for Valleygate Dental Surgery Holdings, LLC's ("Valleygate Holdings") petition to permit medical surgeons to participate in dental surgery cases at Dental Single Specialty Ambulatory Surgery Center Demonstration Projects ("Dental ASC"). I am a practicing Anesthesiologist in Fayetteville, North Carolina. My patients include Pediatrics + Developmental Delayed Pts

The types of procedures that could be performed, and the advantages of completing the physician case with the dental case include:

Allows patients to have 1 ^{General} anesthetic exposure for the combined procedures.

In many such cases, we can repair the damage in a single surgical case, by engaging a team of specialists. When this is possible, everyone benefits – patients, caregivers, surgical team, and the health care delivery system. Costs are lower, total care time is less, and we use far fewer resources. In real time, clinicians working as a team can discuss options and make decisions that optimize patient care. The Valleygate Centers provide a unique setting that is organized around dental disease. While their caution following the letter of rules is laudable, I urge the State Health Coordinating Council to interpret the rules so that, where team care is clinically indicated, appropriate specialists can join the dentists and oral surgeons to complete patient care in a single visit to the surgery center.

Every patient is unique, and not every case will qualify, but for those who do, the interpretation would represent substantial value.

I encourage the State Health Coordinating Council to approve this petition.

Thank you Bryan Apple (Physician Name) Bryan Apple MD
2038 Lytho Place, Fayetteville (Address and Contact Info)
NC 28304

Date: 3/16/2020

Christopher G. Ullrich, MD, Committee Chair
State Health Coordinating Committee

Martha Frisone, Chief
Amy Craddock, PhD, Assistant Chief
Healthcare Planning and Certificate of Need Section
Division of Health Service Regulation
2714 Mail Service Center
Raleigh, NC 27699-2714

RE: Support for Valleygate Dental Surgery Holdings, LLC's Petition to include other medical surgeons in procedures at Dental Single Specialty Ambulatory Surgery Center Demonstration Projects

Dear Dr. Ullrich, Ms. Frisone, and Dr. Craddock,

I am writing to express support for Valleygate Dental Surgery Holdings, LLC's ("Valleygate Holdings") petition to permit medical surgeons to participate in dental surgery cases at Dental Single Specialty Ambulatory Surgery Center Demonstration Projects ("Dental ASC"). I am a practicing Anesthesiologist in Fayetteville, North Carolina. My patients include pediatrics

The types of procedures that could be performed, and the advantages of completing the physician case with the dental case include: ENT cases. Based on recent research, general anesthesia in younger pediatric populations may be less than ideal long term. Therefore to minimize risks, I support the notion of maximizing opportunities for multiple procedures while the patient is anesthetized.

In many such cases, we can repair the damage in a single surgical case, by engaging a team of specialists. When this is possible, everyone benefits – patients, caregivers, surgical team, and the health care delivery system. Costs are lower, total care time is less, and we use far fewer resources. In real time, clinicians working as a team can discuss options and make decisions that optimize patient care. The Valleygate Centers provide a unique setting that is organized around dental disease. While their caution following the letter of rules is laudable, I urge the State Health Coordinating Council to interpret the rules so that, where team care is clinically indicated, appropriate specialists can join the dentists and oral surgeons to complete patient care in a single visit to the surgery center.

Every patient is unique, and not every case will qualify, but for those who do, the interpretation would represent substantial value.

I encourage the State Health Coordinating Council to approve this petition.

Thank you,

Bryant S. Edwards (Physician Name)
1846 Bryn MAWR Dr. Fayetteville, NC (Address and Contact Info)
910-987-5300

Date: 3.16.20

Christopher G. Ullrich, MD, Committee Chair
State Health Coordinating Committee

Martha Frisone, Chief
Amy Craddock, PhD, Assistant Chief
Healthcare Planning and Certificate of Need Section
Division of Health Service Regulation
2714 Mail Service Center
Raleigh, NC 27699-2714

RE: Support for Valleygate Dental Surgery Holdings, LLC's Petition to include other medical surgeons in procedures at Dental Single Specialty Ambulatory Surgery Center Demonstration Projects

Dear Dr. Ullrich, Ms. Frisone, and Dr. Craddock,

I am writing to express support for Valleygate Dental Surgery Holdings, LLC's ("Valleygate Holdings") petition to permit medical surgeons to participate in dental surgery cases at Dental Single Specialty Ambulatory Surgery Center Demonstration Projects ("Dental ASC"). I am a practicing Anesthesiologist in Fayetteville, North Carolina. My patients include Pediatric patients & Adult patients

The types of procedures that could be performed, and the advantages of completing the physician case with the dental case include: Outpatient surgical procedures, in particular ENT cases; Two anesthetics ~~are~~ will be twice the risk or side effects as one anesthetic. I have worked over 30 years as an anesthesiologist, and we always tried to combine procedures when possible to make it safer & easier for the child.

In many such cases, we can repair the damage in a single surgical case, by engaging a team of specialists. When this is possible, everyone benefits – patients, caregivers, surgical team, and the health care delivery system. Costs are lower, total care time is less, and we use far fewer resources. In real time, clinicians working as a team can discuss options and make decisions that optimize patient care. The Valleygate Centers provide a unique setting that is organized around dental disease. While their caution following the letter of rules is laudable, I urge the State Health Coordinating Council to interpret the rules so that, where team care is clinically indicated, appropriate specialists can join the dentists and oral surgeons to complete patient care in a single visit to the surgery center.

Every patient is unique, and not every case will qualify, but for those who do, the interpretation would represent substantial value.

I encourage the State Health Coordinating Council to approve this petition.

Thank you,
Rolf B. WALLIN, MD (Physician Name)
2716 Elmhurst Drive (Address and Contact Info)
Fayetteville, NC 28304 910-574-6668

Date: 3/17/2020

Christopher G. Ullrich, MD, Committee Chair
State Health Coordinating Committee

Martha Frisone, Chief
Amy Craddock, PhD, Assistant Chief
Healthcare Planning and Certificate of Need Section
Division of Health Service Regulation
2714 Mail Service Center
Raleigh, NC 27699-2714

RE: Support for Valleygate Dental Surgery Holdings, LLC's Petition to include other medical surgeons in procedures at Dental Single Specialty Ambulatory Surgery Center Demonstration Projects

Dear Dr. Ullrich, Ms. Frisone, and Dr. Craddock,

I am writing to express support for Valleygate Dental Surgery Holdings, LLC's ("Valleygate Holdings") petition to permit medical surgeons to participate in dental surgery cases at Dental Single Specialty Ambulatory Surgery Center Demonstration Projects ("Dental ASC"). I am a practicing

Oral maxillofacial surgery in Fayetteville, North Carolina. My patients include pediatric & adults

The types of procedures that could be performed, and the advantages of completing the physician case with the dental case include: case of use.

In many such cases, we can repair the damage in a single surgical case, by engaging a team of specialists. When this is possible, everyone benefits – patients, caregivers, surgical team, and the health care delivery system. Costs are lower, total care time is less, and we use far fewer resources. In real time, clinicians working as a team can discuss options and make decisions that optimize patient care. The Valleygate Centers provide a unique setting that is organized around dental disease. While their caution following the letter of rules is laudable, I urge the State Health Coordinating Council to interpret the rules so that, where team care is clinically indicated, appropriate specialists can join the dentists and oral surgeons to complete patient care in a single visit to the surgery center.

Every patient is unique, and not every case will qualify, but for those who do, the interpretation would represent substantial value.

I encourage the State Health Coordinating Council to approve this petition.

Thank you,
Eric Mansfield (Physician Name)
2053 Valleygate St 107 (Address and Contact Info)