

Comments Regarding Duke Health System Petition to Increase Acute Care Bed Need Determination for Wake County in the 2022 State Medical Facilities Plan

Commenter

WakeMed
3000 New Bern Avenue
Raleigh, NC 27610

Thomas Gough
Executive Vice President & Chief Operating Officer
919-350-1960
tgough@wakemed.org

Introduction

WakeMed opposes the portion of the petition filed by Duke University Health System that proposes to increase the need determination for Acute Care beds in the Wake County Service Area from 43 to 89 beds in the 2022 State Medical Facilities Plan (SMFP).

WakeMed offers no opinion regarding Duke's proposal, contained in the same petition, to remove the need determination for 67 acute care beds in the Durham/Caswell Service Area.

Consideration of Acute Care Bed Need During 2021

Acute Care bed need has been a prominent topic in meetings of the Acute Care Services Committee during 2021. Initial application of the standard bed need methodology generated bed need in only two service areas: Durham/Caswell (7 beds) and Scotland (34 beds). Wake County had no bed need. Prior to the first State Health Coordinating Council (SHCC) meeting of 2021, interested parties had the opportunity to comment on potential adjustments to need determination methodologies and calculations. Regarding Acute Care beds, the general consensus of comments received was that the COVID-19 pandemic curbed non-COVID-19 related acute care utilization during 2020, particularly during the first half of the year, which in turn suppressed bed need.

To address the pandemic's impact on acute care bed utilization during 2020, the Healthcare Planning and Certificate of Need Section staff applied five creative alternative scenarios to adjust Acute Care Bed Need Methodology calculations to mitigate the impact of COVID. The alternative test model calculations generated bed needs statewide ranging from 314 to 1,108 beds. There was acknowledgement that any adjustments would affect need determination calculations for the next four years. Based on considerable discussion and feedback regarding the models, staff recommended adoption of Test 4, which generated need for 314 beds statewide, including 43 beds for the Wake County Service Area. The Acute Care Services Committee approved the staff recommendation, which was also approved by the full SHCC for inclusion in the Proposed 2022 SMFP.

Given the amount of time and effort during the 2021 Planning Year devoted to consideration of Acute Care bed need, WakeMed supports the staff recommendations adopted in the Proposed 2022 SMFP. WakeMed believes the proposed need determination of 43 acute care beds for Wake County is sufficient during this time of uncertainty, when alternative methods of inpatient care, namely Hospital

At Home programs, have been developed and approved for reimbursement. It is also judicious that the staff and committee carefully considered the potential impact on the next 4 years, while still addressing potential demand which was obscured by the COVID-19 pandemic. It is still unknown whether the many nuanced fluctuations in demand will continue after the pandemic. Therefore, the expertise and consideration used to determine the proposed need of 43 acute care beds for Wake County is conservative, thoughtful, and supported by WakeMed.

Acute Care Beds Under Development in Wake County

WakeMed understands that Wake County's population is growing rapidly. However, during Calendar Year 2021, a total of 80 new licensed acute care beds will become operational. In April 2021, 30 new beds opened at WakeMed Cary Hospital, bringing its complement to 208 beds. Later in 2021, UNC REX Holly Springs Hospital will open with 50 new beds. These two facilities will add 29,200 available patient days to Wake County's facilities. It makes little sense to add beds to inventory, beyond the 43 beds included in the Proposed 2022 SMFP, until the effects of this new capacity can be fully evaluated.

Summary

WakeMed supports the Standard Need Methodology for acute care beds, but also believes staff recommendations regarding acute care bed need determination for Wake County are prudent given the circumstances of the past year. Further, WakeMed believes that Acute Care Bed Need should be evaluated again in 2022 during development of the 2023 SMFP.

For the reasons stated above, WakeMed respectfully requests that the SHCC deny the portion of Duke's petition regarding increasing the Acute Care bed determination in Wake County from 43 to 89 beds.