

**Comments Supporting the Need Determination for
46 Acute Care Beds in Alamance County
In the 2025 State Medical Facilities Plan**

Commenter

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Statement of Support

Cone Health supports the State Health Coordinating Council (SHCC)'s 46 acute care bed need determination in Alamance County in the *Draft 2025 State Medical Facilities Plan (SMFP)*.

Background

Cone Health acknowledges the challenges the Covid-19 pandemic posed to the Agency and the SHCC in ensuring that planning methodologies accounted for the impact of a growing and aging population. Cone Health aligned with the decision to use an adjusted methodology for determining acute care bed need in the 2021-2024 SMFPs and supports the decision to return now to the standard methodology used prior to the Covid-19 pandemic. Cone Health acknowledges that final need determinations are subject to data updates and adjustments but does not anticipate any data updates.

Reason for the Comments

Alamance County has long been considered a suburb of both the Triad and the Triangle. In fact, the economic growth of the Triad and Triangle are drivers of population growth in Alamance County. Population growth in Alamance County is not being driven by a natural rate of increase from the base population, but rather is due to net migration of individuals and families moving into the area. Net migration has been a key population driver in many areas of North Carolina that have experienced acute care bed need determinations since 2020.

Table 1: Alamance County Population Growth, Historical and Projected

2010 Estimate	2020 Estimate	Percent Change	10 Yr. CAGR	Births	Deaths	Natural Increase	Net Migration
151,160	172,329	14.0%	1.3%	18,668	16,796	1,892	19,277
2020 Estimate	2030 Projection	Percent Change	Proj. 10 Yr. CAGR	Proj. Births	Proj. Deaths	Natural Increase	Proj. Net Migration
172,329	197,216	14.4%	1.4%	21,100	21,576	-476	25,363

Source: NC Office of State Budget and Management; Population Growth 2010-2020; Population Growth 2020-2030

As stated in Table 1, the population is not projected to grow through natural increase, but instead through net migration, indicating a population shift across all age groups that will need additional health care resources. In fact, Table 2 below illustrates the rapid increase in acute care days of care in Alamance County from FY 2018 to FY 2023. The rapid increase in need for general acute care days is also underreported, as NICU days of care were included in the methodology until the 2024 SMFP, shown in the FY 2022 DOC, in the table below.

Table 2: Acute Care Bed Days of Care (DOC) by Fiscal Year

FY 2018 DOC	FY 2019 DOC	FY 2020 DOC	FY 2021 DOC	FY 2022 DOC	FY 2023 DOC	5 Yr. CAGR
36,076	38,418	39,866	42,330	45,443	44,873	4.5%

Source: 2020-2024/5 SMFP

Despite efforts by Cone Health and many health systems to reduce length of stay, the number of days of care (DOC) has increased significantly higher than population on a compound annual growth rate. For these reasons, Cone Health supports the Agency and the SHCC in the need for 46 acute care beds in Alamance County.

Unnecessary Duplication

Cone Health does not believe that retaining the need determination will result in an unnecessary duplication of existing facilities and services. The projected population increase and the demonstrated increase in days of care indicate that additional acute care beds will not result in unneeded capacity.

Basic Principles

Safety and Quality

Cone Health believes that if the needs of the service area are not met, patient safety and quality could be compromised. The impact to patients could be compounded until the need is met.

Comments: Alamance County Acute Care Beds
Cone Health

Access

Cone Health believes that, whenever possible, patients should receive care in their home county. If the need determination is not retained, patients may be forced to seek care outside their home county potentially reducing access to care due to transportation barriers.

Value

Cone Health believes that the proposed 46 acute care bed need in the proposed *2025 SMFP* will provide value to the patients of the service area. The need for acute care beds in Alamance County is increasing and if this need continues to go unmet existing resources become constrained and patients' choice becomes limited.

Conclusion

Cone Health supports the 46 acute care beds in the proposed *2025 SMFP* as the need is clearly demonstrated due to population growth and the increase in inpatient days of care. While Cone Health does not anticipate any data updates or other changes to the identified need prior to adoption of the Draft 2025 SMFP, Cone Health urges the SHCC to deny any petitions that are filed to reduce or eliminate the current need determination of 46 beds in the Alamance County acute care bed service area.