



UNC Health Pardee

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Date: July 23, 2025

To: Andrea Emanuel, PhD
Assistant Chief, Healthcare Planning
North Carolina Department of Health and Human Services
Division of Health Service Regulation
Andrea.Emanuel@dhhs.nc.gov

From: UNC Health Pardee

Re: Comment on Proposed 2026 State Medical Facilities Plan - Henderson County Bed Need Data Verification Request

Dear Dr. Emanuel:

We respectfully submit this comment regarding the acute care bed need determination for Henderson County in the *Proposed 2026 State Medical Facilities Plan (SMFP)*.

The *Proposed SMFP* indicates a need for 19 additional acute care beds in Henderson County, generated by AdventHealth Hendersonville's projected need of 81 total beds less their current inventory of 62 beds. This determination is based on 15,559 patient days reported for FFY 2024.

We note that the Proposed SMFP includes a footnote indicating a discrepancy of greater than 5% between the data AdventHealth Hendersonville reported in their Hospital License Renewal Application versus the data contained in the Hospital Inpatient Discharge Information database, with the HIDI data being used for the bed methodology calculations.

Given the significance of this acute care bed need determination and the data discrepancy already identified in the *Proposed SMFP*, we respectfully request that the Agency verify the accuracy of the patient days data for AdventHealth Hendersonville before finalizing the 2026 SMFP. We believe it is important to ensure that any acute care bed need determination is based on the most accurate data available.

We appreciate your consideration of this request and your continued efforts to maintain the integrity of the State Medical Facilities Plan process.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James M. Kirby, II".

James M. Kirby, II
President and Chief Executive Officer
UNC Health Pardee