



GRANVILLE COUNTY BOARD OF COMMISSIONERS

141 Williamsboro Street • Post Office Box 906 • Oxford, North Carolina 27565-0906
Phone: 919-693-4761 • Fax: 919-690-1766

September 30, 2020

Ms. Martha Frisone, Chief
Healthcare Planning and Certificate of Need Section
Division of Health Service Regulation
2704 Mail Service Center
Raleigh, NC 27699-2704

Re: Comments and Public Hearing Request Regarding Four County Endoscopy Center, LLC's CON Application to Develop an Ambulatory Surgical Facility in Oxford, Granville County, North Carolina; Project ID #K-11941-20

Dear Ms. Frisone:

As Chair of the Board of Commissioners for Granville County, I am writing this letter to express our strong opposition to the project referenced above. While we certainly support the development of needed health services in our county, we believe this project is not needed or in the best interest of residents of our county, and that it will ultimately be detrimental to the county-owned Granville Health System (GHS) for the following reasons:

- The application contains no evidence that the physicians involved in the project will be integrated with the local healthcare system. To the contrary, rather than proposing to establish a medical clinic in Oxford with locally-based physicians to serve outpatients as well as inpatients and emergency patients, the project proposes to perform endoscopies in the facility with no support of the local hospital or ongoing care for patients needing outpatient clinic visits or for emergency patients presenting at the hospital. There is no indication that the physicians would be integrated into local medical community. Rather, the project would likely deteriorate continuum of patient care, increase the utilization of medical care, and increase the total cost of care as patients could be re-directed to additional unnecessary medical providers beyond their local medical care home. Since this service would not be provided in coordination with the existing health system in Granville County, it would be suboptimal for our residents and would likely increase the total cost of medical care for commercial and government payors.
- The data in the application does not account for the volume growth driven by the most recent gastroenterologist recruited by GHS to provide comprehensive care to local residents including inpatients, outpatients and emergency patients. The successful addition

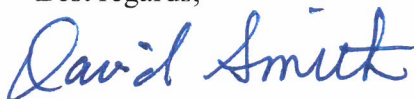
of Dr. Abraham to the GHS medical staff has already improved access to GI services for our residents, including GI endoscopy procedures, and has increased the number of procedures being performed in the county. If successful, the proposed project would directly and significantly harm Dr. Abraham's ability to grow his practice and GHS's ability to maintain full-time gastroenterology service, including emergency department call coverage, for this rural community. The project does not require the same federally mandated twenty-four hours, seven days a week emergency department call for the community as is required of the rural community hospital. If approved, this project would harm GHS and may even prevent the health system from continuing to provide access to gastroenterology emergency care. GHS expended scarce resources to recruit Dr. Abraham to increase access to gastroenterology services for our residents, so approval of this facility would be detrimental to an important investment of Granville County.

- The development of this facility will have a negative financial impact on GHS. As stated in the previous point, GHS has invested considerable resources recruiting a new gastroenterologist to the community, and he has increased the number of endoscopy procedures performed in the county. We believe the addition of another facility will limit the ability of GHS to continue to increase the number of endoscopies being performed there and may even decrease the overall number of endoscopies performed there. As a County organization, I am concerned that any financial loss at GHS resulting from the development of this facility could lead to closure or require subsidization from the County, neither of which would be beneficial to our residents.

Finally, we would like to formally request a public hearing being conducted on this matter. While I understand that we are living in times in which such a request is difficult to grant, we are open to any process that would ensure public safety, including a live hearing conducted virtually, one conducted asynchronously through the submission of written statements, or any other process that would meet the statutory and regulatory requirements. We do not wish to overburden DHSR with this request, but we believe it is necessary to preserve our rights under North Carolina statutes.

Thank you very much for these concerns expressed on behalf of the Granville County Board of Commissioners. If I can provide any additional information for you regarding this matter, please do not hesitate to contact me via the information provided below.

Best regards,



David Smith
Chairman
Granville County Board of Commissioners

CONTACT INFORMATION

PHONE: (919) 693-5240

EMAIL: david.smith@granvillecounty.org