



NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**

JOSH STEIN • Governor

DEV DUTTA SANGVAI • Secretary

MARK PAYNE • Director, Division of Health Service Regulation

VIA EMAIL ONLY

August 26, 2025

Ms. Denise M. Gunter

Denise.gunter@nelsonmullins.com

Exempt from Review

Record #: 4887
Date of Request: August 7, 2025
Facility Name: FirstHealth Moore Regional Hospital
FID #: 943358
Business Name: FirstHealth of the Carolinas, Inc.
Business #: 7337
Project Description: Repave parking lot on hospital campus
County: Moore

Dear Ms. Gunter:

The Healthcare Planning and Certificate of Need Section, Division of Health Service Regulation (Agency), determined that the above referenced proposal is exempt from certificate of need review in accordance with G.S. 131E-184(a)(4). Therefore, you may proceed to offer, develop or establish the above referenced project without a certificate of need.

It should be noted that this determination is binding only for the facts represented by you. Consequently, if changes are made in the project or in the facts provided in your correspondence referenced above, a new determination as to whether a certificate of need is required would need to be made by the Agency. Changes in a project include but are not limited to: (1) increases in the capital cost; (2) acquisition of medical equipment not included in the original cost estimate; (3) modifications in the design of the project; (4) change in location; and (5) any increase in the number of square feet to be constructed.

If you have any questions concerning this matter, please feel free to contact this office.

Sincerely,

Tanya M. Saporito
Project Analyst

Micheala Mitchell
Chief

cc: Construction Section, DHSR

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • DIVISION OF HEALTH SERVICE REGULATION
HEALTHCARE PLANNING AND CERTIFICATE OF NEED SECTION

LOCATION: 809 Ruggles Drive, Edgerton Building, Raleigh, NC 27603
MAILING ADDRESS: 809 Ruggles Drive, 2704 Mail Service Center, Raleigh, NC 27699-2704
<https://info.ncdhhs.gov/dhsr/> • TEL: 919-855-3873

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

August 7, 2025

Via E-mail

Micheala Mitchell, Chief
Healthcare Planning and Certificate of Need Section
North Carolina Department of Health and Human Services
Division of Health Service Regulation
809 Ruggles Drive
Raleigh, North Carolina 27603

RE: FirstHealth Moore Regional Hospital, Pinehurst, NC (Health Service Area V)
FID #943358
License # H0100
No Review and Notice of Exemption

Dear Ms. Mitchell:

On behalf of FirstHealth of the Carolinas, Inc. and FirstHealth Moore Regional Hospital (collectively, “FirstHealth”), I am providing the Agency with prior written notice of two projects proposed to take place on the FirstHealth Moore Regional campus: the demolition of a building known as the Specialty Building and the repaving of a parking lot adjacent to the Specialty Building. The total estimated capital cost for both projects is \$5,312,489. Both projects are expected to be completed by February 2026.

The CON law regulates the offering or developing new institutional health services. N.C. Gen. Stat. § 131E-178(a). Nothing in the CON Law regulates the demolition of a building. *See* N.C. Gen. Stat. § 131E-176(16)a.-v. (definition of “new institutional health service”). Parking is specifically exempted from the CON statute pursuant to N.C. Gen. Stat. § 131E-184(a)(4). The Specialty Building was built several decades ago and is no longer being used. The parking lot needs to be repaved in order to provide additional parking for employees.

Accordingly, we respectfully request the Agency’s written confirmation that: 1) the demolition of the Specialty Building does not require a CON; and 2) the repaving of the parking lot is exempt from CON.

Micheala Mitchell
August 7, 2025
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Please let me know if you have any questions or need additional information.

Thank you for your time and consideration.

With best personal regards.

Sincerely,

A handwritten signature in black ink, appearing to read "Denise M. Gunter", written in a cursive style.

Denise M. Gunter

From: [Waller, Martha K](#)
To: [Stancil, Tiffany C](#)
Subject: FW: [External] No Review and Exemption Letter for FirstHealth of the Carolinas
Date: Thursday, August 7, 2025 10:28:02 AM
Attachments: [Ltr to Micheala Mitchell re Specialty Building and Parking Lot.pdf](#)
[image001.png](#)

Directions after years, don't count!!

Martha Waller

Administrative Specialist 1

Division of Health Service Regulation, Certificate of Need Section North Carolina Department
of Health and Human Services

Main: 919-855-3873

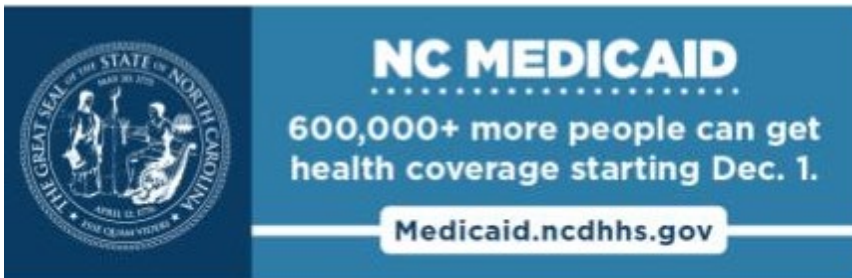
Office: 919-855-3885

martha.waller@dhhs.nc.gov

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From: Denise Gunter <denise.gunter@nelsonmullins.com>

Sent: Thursday, August 7, 2025 10:26 AM

To: Tanya, Saporito <tanya.saporito@dhhs.nc.gov>; Waller, Martha K <martha.waller@dhhs.nc.gov>; Mckillip, Mike <mike.mckillip@dhhs.nc.gov>

Subject: [External] No Review and Exemption Letter for FirstHealth of the Carolinas

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Good morning,

I hope everyone is doing well.

Attached is a no review and exemption letter for FirstHealth. Could you please let me know that you have received this?

Thanks.

DENISE M. GUNTER **PARTNER**
denise.gunter@nelsonmullins.com

She/Her/Hers

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