



NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**

JOSH STEIN • Governor

DEVPUTTA SANGVAI • Secretary

MARK PAYNE • Director, Division of Health Service Regulation

VIA EMAIL ONLY

July 23, 2025

Emily Cromer
emily.cromer@unchealth.unc.edu

Exempt from Review

Record #: 4815
Date of Request: June 20, 2025
Facility Name: University of North Carolina Medical Center
FID #: 923517
Business Name: University of North Carolina Hospitals at Chapel Hill
Business #: 1900
Project Description: Reconfigure and consolidate hospital-based clinics within the Ambulatory Care Center (ACC) on the main campus
County: Orange

Dear Ms. Cromer:

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(g). 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,

For Cynthia Bradford
Project Analyst

Micheala Mitchell
Chief

cc: Acute and Home Care Licensure and Certification Section, DHSR
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

& (POC)

& (Date)

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June 20, 2025

VIA ELECTRONIC MAIL

Micheala Mitchell, Chief
Cynthia Bradford, Analyst
Healthcare Planning and Certificate of Need Section
Division of Health Service Regulation
2704 Mail Services Center
Raleigh, NC 27699-2704

Re: UNC Hospitals Exemption Notice Regarding Hospital-Based Clinic Reconfiguration in ACC

Dear Ms. Mitchell and Ms. Bradford:

Pursuant to N.C. Gen. Stat. § 131E-184(g), UNC Hospitals ("UNCH") gives this prior written notice of a proposed exempt project. UNCH is planning to reconfigure and consolidate various hospital-based clinics and services within its ambulatory care center ("ACC") on the UNCH main campus in Chapel Hill. The reconfiguration and consolidation will allow UNCH to better regionalize patient populations, enabling smoother patient transitions for patients and their care teams and ultimately improving overall operational efficiency.

Exemption Provisions

This renovation project falls within the "Main Campus Exemption Provisions" in N.C. Gen. Stat. § 131E-184(g)(1)-(3). Main Campus Exemption Provisions provide as follows:

- "(g) The Department shall exempt from certificate of need review any capital expenditure that exceeds the four million dollar (\$4,000,000) threshold set forth in G.S. 131E-176(16)b. if all of the following conditions are met:
- (1) The sole purpose of the capital expenditure is to renovate, replace on the same site, or expand the entirety or a portion of an existing health service facility that is located on the main campus.
 - (2) The capital expenditure does not result in (i) a change in bed capacity as defined in G.S. 131E-176(5) or (ii) the addition of a health service facility or any other new institutional health service other than that allowed in G.S. 131E-176(16)b.
 - (3) The licensed health service facility proposing to incur the capital expenditure shall provide prior written notice to the Department, along with supporting documentation to demonstrate that it meets the exemption criteria of this subsection."

For the purposes of the foregoing Main Campus Provisions in Section 131E-184(g), the term "main campus" is defined in N.C. Gen. Stat. § 131E-176(14n) as follows:

"(14n) "Main campus" means all of the following for the purpose of G.S. 131E-184(f) and (g) only:

- a. The site of the main building from which a licensed health service facility provides clinical patient services and exercises financial and administrative control over the entire facility, including the buildings and grounds adjacent to that main building.
- b. Other areas and structures that are not strictly contiguous to the main building but are located within 250 yards of the main building.”

UNCH is a licensed hospital and is thus an existing licensed “health service facility” under the CON Law. See N.C. Gen Stat. § 131E-176(9). The proposed project will occur within the UNCH main campus hospital building.

In accordance with Section 131E-184(g)(1), the sole purpose of the project is to renovate, replace, or expand a portion of the existing UNCH hospital facility on the main campus. **Only existing health services currently offered at UNCH will be provided as a result of this Exempt Project.**

In accordance with Section 131E-184(g)(2), the Exempt Project will “not result in (i) a change in bed capacity as defined in G.S. 131E-176(5) or (ii) the addition of a health service facility or other new institutional health service facility other than that allowed in G.S. 131E-176(16)b.” No new operating rooms will be developed and no major medical equipment will be acquired as a result of this Exempt Project. The capital cost for the project will exceed \$4 million.

Finally, in accordance with Section 131E-184(g)(3), this correspondence serves as prior written notice to the Agency of UNCH’s planned Exempt Project.

Conclusion

It is our understanding and belief that all aspects of this project on UNCH’s main campus are exempt from CON review pursuant to N.C. Gen. Stat. § 131E-184(g), and UNCH requests written confirmation of such understanding. Please do not hesitate to contact me at emily.cromer@unchealth.unc.edu if you have any questions, and thank you in advance for your attention to this matter.

Sincerely,



Emily Cromer
Director of Regulatory Affairs & Facility Strategy
UNC Health

From: [Mitchell, Micheala L](#)
To: [Stancil, Tiffany C](#)
Cc: [Bradford, Cynthia L](#)
Subject: FW: [External] UNC Hospitals Main Campus Exemption
Date: Tuesday, June 24, 2025 11:31:09 AM
Attachments: [image001.png](#)
[2025.06 ACC Clinic Reconfiguration Main Campus Exemption.pdf](#)

Gmorning!

I hope you are well.

Would you mind logging this and assigning it to Cindy?

Thanks,

Micheala

Micheala Mitchell, JD
[NC Department of Health and Human Services](#)
[Division of Health Service Regulation](#)
Section Chief, Healthcare Planning and CON Section
809 Ruggles Drive, Edgerton Building
2704 Mail Service Center
Raleigh, NC 27699-2704
Office: 919 855 3879
Micheala.Mitchell@dhhs.nc.gov

From: Cromer, Emily <Emily.Cromer@unchealth.unc.edu>
Sent: Friday, June 20, 2025 6:41 PM
To: Bradford, Cynthia L <cynthia.bradford@dhhs.nc.gov>; Mitchell, Micheala L <Micheala.Mitchell@dhhs.nc.gov>
Subject: [External] UNC Hospitals Main Campus Exemption

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

Hi Cindy and Micheala,

Please find attached a main campus exemption notice for the reconfiguration of hospital-based clinics on the UNC Hospitals main campus in Chapel Hill.

Thank you,
Emily

Emily Cromer | Director of Regulatory Affairs & Facility Strategy

UNC Health
p (984) 215-6213 | m (919) 884-6213
emily.cromer@unchealth.unc.edu



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