Received 8-16-13

August 16, 2013

Ms. Nadine Pfeiffer, Branch Manager North Carolina Division of Health Service Regulation Medical Facilities Planning Branch 2714 Mail Service Center Raleigh, North Carolina 27699-2714

Re: Comment re: Blue Ridge Bone & Joint Clinic

Dear Ms. Pfeiffer:

NCHA wishes to comment on a petition submitted by Blue Ridge Bone & Joint Clinic for a demonstration project for a single specialty ambulatory surgery center in Buncombe, Madison and Yancey Counties. NCHA does not believe the petition should be approved.

The Blue Ridge Bone & Joint Clinic petition is similar to several others that have been filed previously, all requesting to be added to the Single Specialty Ambulatory Surgery Facility Demonstration Project that was established in the 2010 SMFP. The 2010 SMFP determined that there was no need for additional operating rooms at that time and SHCC has consistently maintained that it will not expand the demonstration project until it has reviewed the performance of the three approved ambulatory surgery centers.

The SHCC should not expand the demonstration project before conducting its review on the success of the first three surgery centers of two operating rooms each. Additional surgery centers or procedure rooms were not recommended by the State Health Coordinating Council and should not be prematurely added to the Ambulatory Surgery Facility Demonstration Project.

Thank you for the opportunity to comment. Please feel free to contact me at 919.677.4233 if you have questions.

Sincerely,

Mike Vicario Vice-President of Regulatory Affairs