July 26, 2017

Christopher Ullrich, M.D.
Chairman
North Carolina State Health Coordinating Council
Health Planning and Certificate of Need Section
North Carolina Division of Facilities Services
809 Ruggles Drive
Raleigh, NC 27603

Re: Adjusted Need Petition for Additional Rehabilitation Beds in HSA III

Dear Dr. Ullrich:

I am an active member of the Medical Staff at Novant Health Presbyterian Medical Center, board-certified Neurology and Vascular Neurology. As you may be aware, in Mecklenburg County there is only one provider of inpatient rehabilitation services. In addition, in the eight counties of HSA III, one provider controls 95% of existing rehabilitation beds.

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As a neurohospitalist and stroke medical director in the NHPMC Advanced Stroke Center, I have often experienced long delays in the admission of my patients to the existing inpatient rehabilitation center as a result of their high utilization. Further, it is not unusual for my patients that meet rehabilitation admission criteria, to be denied admission to the existing provider due to the facilities inability to meet the needs of my patient. As a result, many of my patients are not receiving needed inpatient rehabilitation services.

As you know, early intensive rehabilitation for patients with neurologic disorders, especially stroke, is vital for recovery of function and reduces disability. We live in the "stroke belt", which consists of 11 states of the highest rates of stroke in the country. Some patients, many young, who are able to get expedited rehabilitation services are more likely to return to their baseline functioning, in hopes of being more active in their personal and professional lives. It is a disservice to the patient when we cannot provide this important care.

It is absolutely heartbreaking to look a stroke patient and their family members in the eye and tell them "there's nothing I can do", when they have had a prolonged hospital stay and are eagerly awaiting their "acceptance" at the current provider for acute inpatient rehabilitation. I am often faced with this difficult situation when I know that my patients have no real choice in where they seek acute inpatient rehabilitation services in the area.

This is a devastating time for a patient and their families and their ability to recover begins in the days to months after a hospitalization. Our ultimate goal is to always allow our patients to have access to the best and timely care possible. This becomes impossible when they are underfunded or functionally "too good" for the unknown requirements to the "only" acute inpatient rehabilitation services in the area. We should be able to provide better for our patients. They need us to advocate for them! They deserve a choice.

Novant Health, in partnership with HealthSouth is submitting an adjusted need determination for new rehabilitation beds in HSA III. I, and my colleagues, support the expansion of rehabilitation services in the Greater Charlotte Market. If approved, the Petition will increase access for patients currently denied timely care. This project will promote cost-effective approaches, expand access to health care services and encourage quality health care services by providing more efficient health care services to the residents of Mecklenburg County and surrounding counties.

Please convey to the SHCC my enthusiastic support and that of my colleagues for the approval and this project.

Sincerely,

Carlene W, Kingston, MD

Stroke Medical Director of the Greater Charlotte Market

Novant Health Neurology Specialists