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COMMENT: Opposition to the Proposed Policy TE-4

DATE: July 14, 2020

Good Afternoon. I intend to be brief with my comments today as you have heard from several speakers regarding Proposed Policy TE-4. I am Tina Hinshaw, a native North Carolinian whose family's state residency dates back well into the 1800s. I've had the opportunity to live and work in various states in our country and I always return home. I currently reside in Elon, North Carolina. I care deeply about the citizens of North Carolina as well as the following of our state governmental procedures. These procedures were devised for a reason and, while they do need to be updated, refreshed, and revised as our world evolves, there is a formal process that these procedures should go through to be amended. My respect and passion for our state government and procedural matters did NOT start with the introduction of Proposed Policy TE-4. It goes back well into my youth when I had the opportunity to be a Governor's Page in the early 1980s. In addition to my earlier comments about my North Carolina lineage, unfortunately, I am also a healthcare consumer in the midst of becoming a cancer survivor. I have had the opportunity to receive services from a number of the facilities for which members of the SHCC are affiliated, Charlotte Radiology, Greensboro Imaging, and UNC to name a few. I do thank you for the excellent care your organizations provide our citizens. And I am come before you today as a 30+ year healthcare professional who also has the privilege of leading the operations team for Alliance Radiology's Southeast Region.

I open with this to say that I wish to speak today about my concern regarding Proposed Policy TE-4. What I find most troubling about Proposed Policy TE-4 is that the public was not aware that the Agency was creating the Proposed Policy and thus had no opportunity to engage. With the Proposed Policy being revealed on the website well after the comment period closed, the public lost the opportunity to have its concerns heard, questions addressed, or suggestions considered. As other speakers have described in some detail, Proposed Policy TE-4 is ill-conceived and not necessary.

I am concerned for the SHCC as the Technology and Equipment Committee has not conducted sufficient analysis of Proposed Policy TE-4 or explored the potential unintended consequences if it is adopted. Over the years, Alliance has shown our willingness to participate in working sessions, roundtables, and the like to use the health planning process to improve the delivery of healthcare within our State. Proposed Policy TE-4 represents an end run around our State's health planning process. On June 10, the SHCC voted to adopt the Technology and Equipment Committee's recommendation without any industry comment or deliberation and now here we are with a range of valid concerns over the terms and implications of a Proposed Policy which was not fully vetted.

At this point, I encourage you to vote to exclude Policy TE-4 from the 2021 State Medical Facilities Plan. I also invite the SHCC, the Technology and Equipment Committee, and the Agency to engage with Alliance and with me specifically to discuss the future of healthcare in our State and how we may work collaboratively and appropriately in the future to define policies that benefit our citizens.