

COMMENTS REGARDING WAKEMED PETITION
FOR ADJUSTED NEED DETERMINATION
FOR OPERATING ROOMS IN WAKE COUNTY

Duke University Health System, Inc. hereby submits these comments regarding the petition filed by WakeMed to adjust the need determination for a dedicated operating room in Wake County. This adjustment is not warranted at this time.

Specifically, Duke offers the following points for consideration:

- WakeMed seeks a need for a dedicated operating room that would be specific to a “Level III Trauma Center.” The petition makes clear that WakeMed Cary is the only such Level III Trauma Center in the county. Therefore, WakeMed seeks an adjustment for which it would be the only eligible applicant. Providing a need determination that applies to a single provider is generally inconsistent with the state planning process. To the extent that WakeMed contends that all Level III Trauma Centers should be able to develop a dedicated trauma operating room, that would be the subject for a spring petition for a change in statewide policies and methodologies, not a local adjustment.
- WakeMed Cary currently shows a surplus of more than three operating rooms in the draft 2022 plan, just as it did in the 2021 plan (when reported volumes would not be affected by COVID factors). If it wants to dedicate an OR for trauma needs, it would appear to have sufficient existing capacity to do so within its existing complement of rooms.
- Rex Hospital has also filed a petition for dedicated hospital operating rooms in the 2022 SMFP. WakeMed’s petition would appear to duplicate the adjustment requested in that petition, which would provide WakeMed the opportunity to apply to meet any identified need for hospital OR capacity. There is no need for WakeMed’s proposed adjustment also.

For all the foregoing reasons, WakeMed’s petition should be denied.