

VIA EMAIL



March 15, 2022

Sandra B. Greene, DrPH, Chairperson
North Carolina State Health Coordinating Council (SHCC) &
Acute Care Services Committee
c/o Healthcare Planning Section
NC Division of Health Service Regulation
2704 Mail Service Center
Raleigh, North Carolina 27699-2704

2085 Frontis Plaza Boulevard
Winston-Salem, NC 27103

RE: Novant Health Comments Regarding Petitions by Blue Ridge Health System and Duke University Health System

Dear Dr. Greene:

Novant Health appreciates the opportunity to comment on the recent petitions filed in the development of the 2023 State Medical Facilities Plan ("SMFP"). There are two petitions submitted that fall under the Acute Care Services Committee's purview:

- Blue Ridge Health System: Proposes to eliminate Policy AC-5; and
- Duke University Health System: Proposes to remove NICU beds from the acute care bed need methodology

Novant Health respectfully requests more study and analysis of both these proposals before a committee or SHCC decision is made. It is unclear what unintended consequences, if any, may result from the acceptance of these petitions in the 2023 SMFP and beyond.

Thank you for the opportunity to respond to these petitions.

Sincerely,

DocuSigned by:
Andrea Gymer
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Andrea Gymer
Vice President, Strategic & Business Planning