

December 14, 2015



Nadine Pfeiffer, Rule Review Manger  
NC Division of Health Service Regulation  
Office of the Director  
809 Ruggles Dr.  
Raleigh, NC 27603

2085 Frontis Plaza Boulevard  
Winston-Salem, NC 27103

RE: Novant Health, Inc. Comment in Support of the Repeal of CON Rules Provisions  
(Subchapter 10A NCAC 14C)

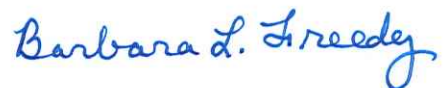
Dear Ms. Pfeiffer:

Novant Health supports the changes proposed to the CON Rules in your Memo dated September 30, 2015, including the Department's intent to proceed with the repeal of 86 Certificate of Need rules. As an organization that files many CON Applications annually, we welcome these proposed changes. It appears that the CON rule provisions to be repealed will reduce the remaining provisions of the CON rules to their essence, Definitions and the Performance Standards. This approach will greatly simplify the CON Application preparation process for providers and will make the state's CON Application review process more streamlined and efficient for all who are involved in it. Many of the CON rule provisions proposed for repeal are obsolete and out of synch with current technology for certain regulated assets, redundant, (i.e., duplicative of CON Application Questions and SMFP Polies), and do not add value to the CON review and decision-making process. Repeal of these CON rule provisions may also serve to make CON litigation less frequent or when it occurs, less complex, costly, and protracted.

The CON rules to be repealed touch on a wide array of assets regulated by Certificate of Need including ICU Beds, Adult Care Home Beds, Pediatric ICU Beds, Neonatal ICU Beds, Hospice Services, Cardiac Catheterization Units, Heart-Lung Bypass Units, Diagnostic Centers, Radiation Therapy Equipment, Home Health Agency Offices, Operating Rooms, Dialysis Stations, CT Scanners, ICF/MR Beds, Psychiatric Beds, MRI Scanners, Rehabilitation Facilities, Bone Marrow Transplants, Solid Organ Transplants, Major Medical Equipment, Lithotripter Equipment, Burn ICU Beds, Gamma Knives, PET Scanners, Acute Care Beds, GI Endoscopy Rooms, and Hospice Inpatient & Residential Beds. The proposed CON rules repeal is a large and overdue undertaking and will likely have a beneficial impact on how hospitals, other outpatient facilities, and mobile providers are able to grow and embrace the latest technologies and techniques in healthcare delivery for North Carolina citizens.

If you have any questions about Novant Health's support for these changes, please do not hesitate to contact me

Sincerely,



Barbara L. Freedy, Director  
Certificate of Need  
Novant Health, Inc.

*File: CONRulesRepealNCSupportLetterNovantHealth.12.14.2015.docx*