



Uniting hospitals, health systems and
care providers for healthier communities

February 14, 2020

Ms. Nadine Pfeiffer
DHSR Rules Coordinator
809 Ruggles Drive
2701 Mail Service Center
Raleigh, NC 27699-2701

DHSR.RulesCoordinator@dhhs.nc.gov

Re: 10A NCAC 13B Licensing of Hospitals – Governance and Management (Section .3500) and
Medical Staff (Section .3700)

Dear Ms. Pfeiffer:

NCHA represents 130 hospitals and health systems in North Carolina and we thank you for the opportunity to comment on the Proposed Rule changes to Chapter 13B, Licensing of Hospitals, as found in the December 16, 2019 issue of the North Carolina Register.

As you know the December 16, 2019 published rule changes result from a rule review process that was initiated in 2016 and that, in some cases represented the first proposed change to the rules in decades. Those proposals resulted in discussions and negotiations over more than two years with the North Carolina Medical Society and a Medical Care Commission Subcommittee.

The December 16, 2019 published version of these rules are consistent with the Medicare/Medicaid Conditions of Participation for Hospitals, as well as with Joint Commission and other accrediting body requirements. The rules also recognize the roles of the hospital governing board and its medical staff in working together to provide quality healthcare in the community. For this reason, NCHA is supportive of these proposed rules and invites their adoption as permanent rules.

Thank you for your consideration of our comments. Please contact Mike Vicario (mvicario@ncha.org) or me if you have questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen J. Lawler", written over a light blue horizontal line.

Stephen J. Lawler
President
North Carolina Healthcare Association

