

Written Comments Filed by Wake Forest University Baptist Medical Center
Concerning Digestive Health Specialists Application, Davie County

31 AUG 2010 3:43

Jane Rhoe-Jones, Project Analyst
N.C. Department of Health and Human Services
Division of Facility Services
Certificate of Need Section
701 Barbour Drive - Council Building
Raleigh, NC 27602-0629

August 28, 2010

RE: Written Comments regarding Digestive Health Specialists, Renovate space and develop an ambulatory surgical facility with one GI endoscopy room, HSA II, Project I.D. #G-8544-10

Dear Ms. Rhoe-Jones:

I am writing to provide comments from Wake Forest University Baptist Medical Center (WFUBMC) in response to the CON application filed by Digestive Health Specialists in Davie County. These comments are filed in accordance with NCGS 131E-185(a1)(1). After a review of the Digestive Health application, WFUBMC is concerned that their application does not take into account the approved CON for the Davie Hospital Replacement- Project ID- G- 8087-08. Our comments are outlined as follows:

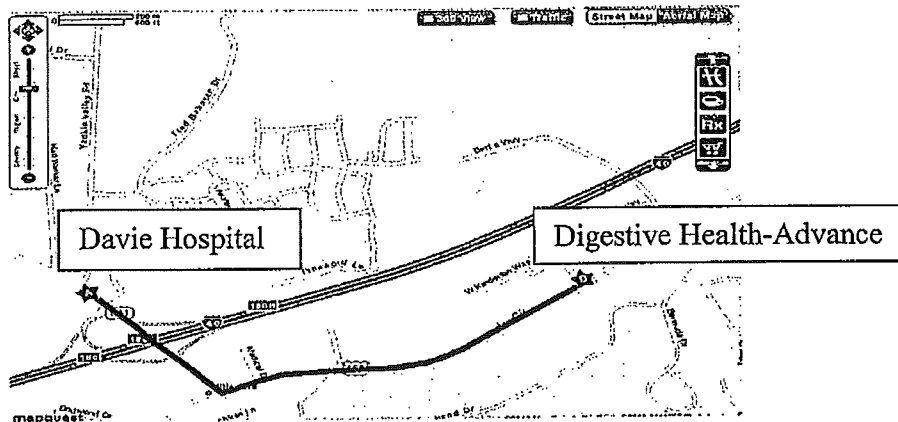
- 1) Digestive Health proposes to serve the same service area as defined in the approved Davie Hospital replacement application. Per the terms of the Certificate of Need application the outpatient portion of the Davie project will include one Endoscopy Room. This room will serve ambulatory patients only until approximately 2017 when inpatient beds will be permitted to become operational.

The proposed service area for the Davie project includes the following zip codes: 27006, 27028, 27012, 27023, and 27055 which are located in Davie, Forsyth and Yadkin counties. The Davie service area is the very same service area as outlined on page 43 of the Digestive Health application.

<i>Service Area Comparison</i>	
Davie CON Application Service Area	Digestive Health Application
27006- Bermuda Run/Davie County	Davie County
27028- Mocksville/Davie County	
27012-Clemmons/Forsyth County	Forsyth County
27023-Lewisville/Forsyth County	
27055-Yadkinville/Yadkin County	Yadkin County

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As you can see from the map below, this clinic is located on the backside of Kinderton Business Park, which is located on Highway 158 about halfway between exits 180 (our exit) and exit 182 (the Tanglewood exit). According to MapQuest, the planned Davie facility is 1.25 miles (using the Lowes Foods across the street from our site as a starting point) from the proposed Digestive Health site.



- 2) Digestive Health failed to account for the Davie Hospital Replacement endoscopy volumes and instead on page 48 of its application projected that they would continue to provide 200 procedures per year at the Davie Hospital facility. However, there is no basis for these procedure counts. Digestive Health Specialists informed Davie Hospital leadership that they would discontinue practicing at Davie County Hospital in August 2009 (Lynn Doss, Davie County Hospital Administrator- personal communication Aug 30, 2010). Therefore, Digestive Health's application is misrepresenting what they would project to provide at Davie County Hospital. Please see the table below which outlines the approved GI endoscopy volumes in CON Project ID#- G-8078-08.

Procedure	PY1 DCEHC- DCH Procedures	PY2 DCEHC- DCH Procedures	PY3 DCEHC- DCH Procedures
	(CY 2012)	(CY 2013)	(CY 2014)
Outpatient Endoscopy Procedures	1,221	1,281	1,342
TOTAL	1,456	1,526	1,598

- 3) Digestive Health failed to appropriately answer the CON application question in Section III (8) (d) that requests the applicant to describe how the proposed project

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will result in the reduction of procedures currently performed in the existing facilities. Please refer to the table above for the Davie County Hospital volumes as outlined in the approved CON Project ID G-8078-08.

- 4) WFUBMC believes the Davie, Forsyth and Yadkin markets are well served with licensed ambulatory surgery center GI endoscopy rooms. Using the 2006 National Survey of Ambulatory Surgery ambulatory use rate for ambulatory digestive system procedures of 266.4 per 10,000 population (cited on page 31 of the Digestive Health Application) there is a clear over supply of licensed ambulatory GI endoscopy rooms to support the population in Forsyth, Davie, and Yadkin counties. The alternate analysis below would suggest there are already enough rooms to serve this patient population:

Step 1)	Determine Total Service Area Population	
	County	2009 Population
	Davie	41,760
	Forsyth	355,640
	Yadkin	38001
	Total Population	435,401

Step 2)	Determine Number of Ambulatory Endoscopy Rooms Currently in the Market	
	Draft 2010 State Medical Facilities Plan- Licensed Endoscopy Rooms- Forsyth, Davie, and Yadkin Counties.	
	Hospital	# of Licensed Endoscopy Rooms
	Davie County Hospital	1
	NCBH Outpatient Endoscopy	2
	Digestive Health Specialists	4
	Salem Gastroenterology	4
	TOTAL	11
	<i>*FMC and NCBH licensed outpatient endoscopy rooms have been removed from the inventory above as they primarily serve inpatient cases- although they both serve ambulatory cases as well. NCBH</i>	

Step 3)	Determine Total Estimated GI Cases &
	44

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Total Population (435,401)/10,000= Population per 10,000 (44) x Use Rate (266.4)	11722
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Step 4) Determine Total # of Rooms to support GI Ambulatory Population	
11722 estimated GI Ambulatory cases / SMFP Capacity Standard for licensed GI Endoscopy Rooms (1,500)=	8

Step 5) Determine GI Endoscopy Room Need/ Surplus	
# GI rooms needed (8)- Existing Inventory of licensed GI ambulatory rooms (11) = # ambulatory GI rooms needed	(3)

- 5) The applicant described in its application that it intends to maintain privileges at all the hospitals they currently serve including Forsyth Medical Center, yet the applicant does not provide a response to how the Advance volumes will be impacted by the proposed GI Endoscopy room proposed for FMC-Clemmons. Although FMC Clemmons will be an inpatient facility, the approved CON FMC Clemmons application projects it will serve 2,000 GI endoscopy cases, a portion of which will be ambulatory. Therefore it is questionable as to whether Advance and western Forsyth truly need another licensed ambulatory GI endoscopy room.

Thank you for the opportunity to provide these comments and your careful consideration of these important issues. Please do not hesitate to contact me at (336) 716-51046.

Respectfully Submitted,



Lynn S. Pitman
Associate Vice President, Wake Forest University Baptist Medical Center