



WAKE
OMS

WAKE ORAL AND MAXILLOFACIAL SURGERY

Dental Implants • Reconstructive Surgery • Wisdom Teeth

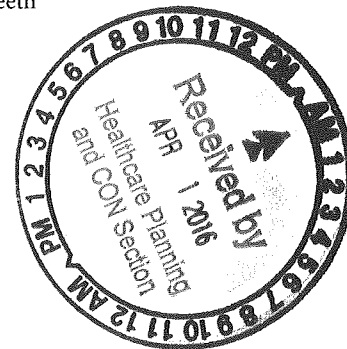
may

March 30, 2016

Scott A. Hum, DMD, PA

Diplomate American Board
of Oral & Maxillofacial
Surgery

Martha Frisone, Assistant Chief, Certificate of Need
Healthcare Planning and Certificate of Need Section
Division of Health Service Regulation
2704 Mail Service Center
Raleigh, North Carolina 27699-2704



Re: "Surgical Center for Dental Professionals of Raleigh"

I recently received a bulk email asking me to write to your office, to support the above center's request for a certificate of need. On the contrary, I am writing to express my objection to and reservations for the proposed 'surgical center'. I have previously written to your office to voice my objections and they are still valid:

1. **Redundancy.** There are at a minimum, eighteen Oral & Maxillofacial Surgeons in Wake County who hold Anesthesia permits from the North Carolina Board of Dental Examiners. Each one of these Oral & Maxillofacial Surgeons already provides these proposed services in their outpatient office settings.
2. **Patient Care/ Selection.** Who will be responsible to assess the medical status and health of the proposed center's patients? Who will decide if the patient is healthy enough to undergo the proposed surgery/anesthesia? The average Dentist is not trained to make these decisions.
3. **Post -Operative Care.** Who will provide appropriate post operative care both in the immediate post surgical time frame as well as when complications arise in the early post operative time period? Again, general Dentists are not adequately trained to manage post-surgical complications. The center's proposed MD Anesthesiologists are not primarily located in Wake County and are trained to manage immediate anesthetic concerns and not responsible for overall patient management.
4. **Post-Operative complications.** The Dentists who most likely will utilize this center do not hold medical staff appointments at our area hospitals. Who will be responsible if a patient requires post-operative hospital admission or even just Emergency Department evaluation? Will the other Dentists covering call for those Dentists who utilize the center have the ability to address post-operative concerns and are they reliably available?

Unfortunately, these are just a few of the concerns when a facility such as the proposed center, provides access to inadequately trained health care providers and allows them to attempt lengthy and complex surgical procedures while their patient is under anesthesia. No area hospital would grant privileges to do the same. I would urge that your division not grant the proposed CON.

Sincerely,

Scott A. Hum, DMD

2500 Blue Ridge Rd., Suite 201 • Raleigh, North Carolina 27607
tel (919) 783-9920 • fax (919) 783-7026 • www.wakeoms.com