

July 2, 2018

Celia Inman, Project Analyst
North Carolina Department of Health and Human Services
Division of Health Service Regulation
Healthcare Planning and Certificate of Need Section
809 Ruggles Drive
Raleigh, North Carolina 27603

Re:

Comments in Opposition to CON application filed by

MC Kernersville, LLC and The Moses H. Cone Memorial Hospital

Project I.D. No. G-11516-18

Dear Ms. Inman:

I am the CEO of Digestive Health Specialists, P.A., a gastroenterology practice with locations in Winston-Salem, Kernersville, Advance, Thomasville and King. MC Kernersville, LLC and The Moses H. Cone Memorial Hospital ("Cone Health") have filed a CON application in which Cone Health proposes to add two operating rooms, one GI endoscopy room and one procedure room to a facility called Triad Surgery Center in Kernersville.

I am writing to express DHS's opposition to the GI endoscopy room proposed in the Cone Health application. DHS is an existing provider of endoscopy services in Kernersville. DHS owns 2 GI endoscopy rooms located at 280 Broad Street, Suite g in Kernersville. We have capacity to increase our cases and procedures in Kernersville. Cone Health's proposed facility is only a few minutes away from our facility. In addition to DHS, another gastroenterology practice, Gastroenterology Associates of the Piedmont, P.A., has received CON approval to relocate two of its GI endoscopy rooms from Winston-Salem to Kernersville. GAP's facility is also just a few minutes away from our facility. I understand that GAP's GI endoscopy rooms are scheduled to open in Kernersville on July 5, 2018. Thus, there will be four GI endoscopy rooms in Kernersville, which is more than enough capacity to meet the needs of residents of Kernersville and surrounding areas. Kernersville, with a population of around 25,000 people, does not need five GI endoscopy rooms. There are also seven GI endoscopy rooms located in nearby High Point and 24 GI endoscopy rooms in Winston-Salem. Greensboro has 19 GI endoscopy rooms. In short, patients in Kernersville and nearby areas have multiple options for GI endoscopy. Cone Health's proposed GI endoscopy room is not needed and unnecessarily duplicates existing and approved projects.



I urge the CON Section to disapprove Cone Health's proposal to add another GI endoscopy room in Kernersville.

Please let me know if you need further information.

Thank you for considering these comments.

Sincerely,

Jacquelyn A. Tillinger, MHA, CMPE, OHCC

Chief Executive Officer

Digestive Health Specialists, P.A.

Advance Kernersville King Thomasville Winston-Salem