



NC DEPARTMENT OF  
**HEALTH AND  
HUMAN SERVICES**

ROY COOPER • Governor

KODY H. KINSLEY • Secretary

MARK PAYNE • Director, Division of Health Service Regulation

VIA EMAIL ONLY

April 25, 2022

Denise M. Gunter

[Denise.gunter@nelsonmullins.com](mailto:Denise.gunter@nelsonmullins.com)

**Exempt from Review**

**Record #:** 3883  
**Date of Request:** April 19, 2022  
**Facility Name:** FirstHealth Moore Regional Hospital  
**FID #:** 943358  
**Business Name:** FirstHealth of the Carolinas, Inc.  
**Business #:** 737  
**Project Description:** Renovate and upgrade OR 17 and OR 18 in the Reid Heart Center  
**County:** Moore

Dear Ms. Gunter:

The Healthcare Planning and Certificate of Need Section, Division of Health Service Regulation (Agency), determined that the above referenced proposal is exempt from certificate of need review in accordance with G.S. 131E-184(g). Therefore, you may proceed to offer, develop or establish the above referenced project without a certificate of need.

It should be noted that this determination is binding only for the facts represented by you. Consequently, if changes are made in the project or in the facts provided in your correspondence referenced above, a new determination as to whether a certificate of need is required would need to be made by the Agency. Changes in a project include but are not limited to: (1) increases in the capital cost; (2) acquisition of medical equipment not included in the original cost estimate; (3) modifications in the design of the project; (4) change in location; and (5) any increase in the number of square feet to be constructed.

If you have any questions concerning this matter, please feel free to contact this office.

Sincerely,

Tanya M. Saporito  
Project Analyst

Micheala Mitchell  
Chief

cc: Construction Section, DHSR  
Acute and Home Care Licensure and Certification Section, DHSR

**NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • DIVISION OF HEALTH SERVICE REGULATION**  
**HEALTHCARE PLANNING AND CERTIFICATE OF NEED SECTION**

LOCATION: 809 Ruggles Drive, Edgerton Building, Raleigh, NC 27603  
MAILING ADDRESS: 809 Ruggles Drive, 2704 Mail Service Center, Raleigh, NC 27699-2704  
<https://info.ncdhhs.gov/dhsr/> • TEL: 919-855-3873

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

Denise M. Gunter  
T: 336.774.3322 F: 336.774.3372  
denise.gunter@nelsonmullins.com

The Knollwood, 380 Knollwood Street Suite 530  
Winston-Salem, North Carolina 27103  
T: 336.774.3300 F: 336.774.3299  
nelsonmullins.com

April 19, 2022

**VIA EMAIL ONLY**

Micheala Mitchell, Chief  
North Carolina Department of Human Services  
Division of Health Service Regulation  
Healthcare Planning and Certificate of Need  
809 Ruggles Drive  
Raleigh, North Carolina 27603

Re: FirstHealth of the Carolinas d/b/a FirstHealth Moore Regional Hospital  
FID# 943358  
License # H0100  
Moore County  
Health Service Area V

Dear Ms. Mitchell:

On behalf of FirstHealth of the Carolinas d/b/a FirstHealth Moore Regional Hospital (“FirstHealth Moore”) in Pinehurst, North Carolina, I am writing to request a certificate of need exemption pursuant to N.C. Gen. Stat. § 131E-184(g), the Main Campus Exemption. Specifically, FirstHealth Moore proposes to renovate two of its hybrid ORs (ORs 17 and 18) in the Reid Heart Center at a capital expenditure greater than \$2 million (the “Project”). The Reid Heart Center is a five-story building on the main campus of FirstHealth Moore, and it is contiguous to the main hospital. Attached as **Exhibit A** is a campus map showing the Reid Heart Center’s proximity to the hospital.

A hybrid OR is an advanced procedural space that combines a traditional operating room with an image guided interventional suite. This combination allows for highly complex, advanced surgical procedures such as transcatheter aortic valve replacement (TAVR) procedures. Hybrid ORs allow cardiologists and heart surgeons to work together at the same time.

The Project entails the following:

Ms. Mitchell  
April 19, 2022  
Page 2

**OR 17:** remove existing equipment, upgrade general finishes of the room to include new electrical, flooring, rail adjustments, painting, HVAC, and lights. A new Philips Azurion 7 C20 Catalyst (C-arm) that is ceiling hung will also be installed. This equipment costs less than \$2 million, and therefore does not meet the definition of major medical equipment under the CON Law. N.C. Gen. Stat. § 131E-176(14o).

**OR 18:** remove existing equipment, upgrade general finishes of the room to include electrical, flooring, rail adjustments, ceiling removal, additional Unistrut, reconfiguring laminar flow panels, painting, HVAC, and lights. New equipment will also be installed. The equipment consists of the following:

- Philips Azurion 7 C20 Flexarm (image guided therapy system)
- Stryker Light booms (2)
- Stryker shield boom
- Stryker monitor boom

No single item of equipment or system of components exceeds \$2 million. Therefore, the project does not involve major medical equipment pursuant to N.C. Gen. Stat. § 131E-176(14o).

This letter demonstrates that the Project qualifies for the Main Campus Exemption because:

- (1) The sole purpose of the capital expenditure is to renovate, replace on the same site, or expand the entirety or a portion of an existing health service facility that is located on the main campus; and
- (2) The capital expenditure does not result in (i) a change in bed capacity as defined in G.S. 131E-176(5) or (ii) the addition of a health service facility or any other new institutional health service other than that allowed by G.S. 131E-176(16)(b).

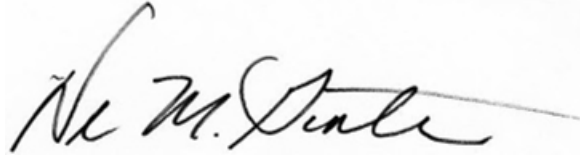
As shown in **Exhibit A**, the Reid Heart Center is located on the main campus of FirstHealth Moore. It is contiguous to the main building from which FirstHealth provides clinical patient services and exercises administrative and financial control over the entire facility. See N.C. Gen. Stat. § 131E1-96(14n). There will be no increase in bed capacity as defined in G.S. § 131E-176(5) or the addition of a health service facility or any other new institutional health service other than that allowed by G.S. § 131E-176(16)(b).

Accordingly, FirstHealth Moore respectfully requests that the Agency issue its written determination that the Project described in this letter is exempt from CON review.

Please let me know if you have any questions or need further information. We appreciate the Agency's time and prompt consideration of this request.

Ms. Mitchell  
April 19, 2022  
Page 3

Sincerely,

A handwritten signature in black ink, appearing to read "Denise M. Gunter", written over a light gray rectangular background.

Denise M. Gunter

Enclosures

# FirstHealth Moore Regional Hospital Area Map

**FirstHealth**  
Pinehurst, N.C.  
[www.firsthealth.org](http://www.firsthealth.org)



<b>1</b>	Reid Heart Center - Chest Center of the Carolinas - FirstHealth Cardiology - FirstHealth Valve Clinic - FirstHealth Cardiovascular & Thoracic
<b>2</b>	FirstHealth Outpatient/Patient Registration - Employee/Occupational Health
<b>3</b>	Pinehurst Neurology
<b>4</b>	Pinehurst Oral Surgery
<b>5</b>	Mid-South Orthopaedics
<b>6</b>	Pinehurst Dermatology
<b>7</b>	Pinehurst Medical Clinic
<b>8</b>	FirstHealth Rehabilitation-Aviemore

<b>9</b>	FirstHealth Community Health Services - Diabetes & Nutrition Education Center
<b>10</b>	FirstHealth Neurosurgery
<b>11</b>	Pinehurst Plastic Surgery Specialists
<b>12</b>	Pinehurst Hip & Knee Center
<b>13</b>	Pinehurst Family Care Center
<b>14</b>	FirstHealth Cardiology
<b>15</b>	FirstHealth Outpatient Imaging
<b>16</b>	Pinehurst Radiology Associates
<b>17</b>	FirstCarolinaCare Insurance Company

<b>18</b>	FirstHealth Speciality Centers Building 18 - Infectious Diseases 18 - Transition Care Clinic 19 - Back & Neck Pain 19 - FirstHealth Patient Accounts 20 - Behavioral Services Clinic 21 - Wound Care & Hyperbarics
-----------	--

<b>22</b>	FirstHealth Outpatient Cancer Center
<b>23</b>	Clara McLean House
<b>24</b>	Surgery Center of Pinehurst
<b>25</b>	Pinehurst Surgical
<b>26</b>	FirstHealth Fitness
<b>27</b>	FirstHealth Rehabilitation-Moore Rehab

# Directions to FirstHealth Moore Regional Hospital

## Traveling south from US 1 /US 15-501

- Take US 1 South/US 15-501 South to Highway 2.
- Take Highway 2 to traffic circle.
- Take the second exit off the traffic circle onto NC 211 West to Moore Regional Hospital.
- At the second stoplight, take a right onto Memorial Drive. (Follow signs for Visitor Entrance.)
- The Visitor Entrance is the second right.
- Parking is available in the Green parking lot.

## Traveling north from US 15-501:

- Take US 15-501 to traffic circle.
- Take the third exit off the traffic circle to NC 211 West to Moore Regional Hospital.
- At the second stoplight, take a right onto Memorial Drive. (Follow signs for Visitor Entrance.)
- The Visitor Entrance is the second right.
- Parking is available in the Green parking lot.

## Traveling south from US 1:

- Take U.S. 1 South to Highway 2 West.
- Take Highway 2 West (Midland Road) to traffic circle (roundabout).
- Take NC 211 West toward FirstHealth Moore Regional Hospital.
- Take fourth right onto Memorial Drive. (Follow signs for Visitor Entrance.)
- The Visitor Entrance is the second right.
- Parking is available in the Green parking lot.

## Traveling north from US 1:

- Take US 1 North to US 15-501 North.
- Take US 15/501 North to traffic circle.
- Take the third exit off the traffic circle to NC 211 West to Moore Regional Hospital.
- At the second stoplight, take a right onto Memorial Drive. (Follow signs for Visitor Entrance.)
- The Visitor Entrance is the second right.
- Parking is available in the Green parking lot.

## Traveling north from NC 177:

- Take NC 177 North to US 1 North.
- Take US 1 North to US 15-501 North.
- Take US 15/501 North to traffic circle.
- Take the third exit off the traffic circle to NC 211 West to Moore Regional Hospital.
- At the second stoplight, take a right onto Memorial Drive. (Follow signs for Visitor Entrance.)
- The Visitor Entrance is the second right.
- Parking is available in the Green parking lot.

## Traveling west from NC 211:

- Take NC 211 West to Moore Regional Hospital.
- At the second stoplight, take a right onto Memorial Drive. (Follow signs for Visitor Entrance.)
- The Visitor Entrance is the second right.
- Parking is available in the Green parking lot.

## Traveling south from NC 24-27:

- Take NC 24-27 to US 220 South.
- Take US 220 South to NC 211 East.
- Take NC 211 East to Moore Regional Hospital.
- Take left at stoplight onto Memorial Drive in Pinehurst. (Follow signs for Visitor Entrance.)
- The Visitor Entrance is the second right.
- Parking is available in the Green parking lot.

## From Old US 421 S:

- Take Old US 421 S to NC 902.
- Take left onto Siler City Glendon Road. (Siler City Glendon Rd. becomes Glendon-Carthage Rd.)
- Take slight right onto US 15 501 Hwy/US 15 S/US 501 S. Continue to follow US 15 S/US 501 S.
- Enter traffic circle (roundabout) and take the first exit onto NC 211 West.
- Take NC 211 West toward FirstHealth Moore Regional Hospital.
- Take fourth right onto Memorial Drive. (Follow signs for Visitor Entrance.)
- The Visitor Entrance is the second right.
- Parking is available in the Green parking lot.