

January 9, 2017

Drs. Ullrich and Greene:

Thank you for the opportunity to submit comments to the Operating Room Methodology Workgroup. Attached please find comments on the methodologies and proposed models from Wake Forest Baptist Health (WFBH). In addition, WFBH offers an additional model for consideration by the workgroup.

Thank you,

Lynn Pitman
Associate Vice President
Strategic Planning

Additional Methodology Suggestion

Academic Medical Centers provide unique services to patients across the state in order to meet the specific needs of patients that cannot be met by general acute care hospitals and other surgical providers. The patients served at Academic Medical Centers are often complex, complicated, and require specialized procedures and surgeons. At North Carolina Baptist Hospital, 52.4% of cases are ASA physical status 3 or greater with the average ASA physical status across all cases being 3.63. Conversely, the average ASA physical status at ASCs is 2 and at tertiary operating suites in general is 2¹.

The unique capabilities and needs of AMCs and the patients they serve should be taken into consideration in the development of proposed need methodologies. While it is true that AMCs do perform low acuity outpatient surgical cases, these cases do not compose the majority of the surgical volume. Outpatient cases performed at AMCs tend to be more complex than those performed at ambulatory surgery centers (ASCs) and general acute care hospitals, requiring more time in surgery and recovery. This is exhibited in the average case lengths as reported in the License Renewal Applications. Of the existing Tier 1 facilities, the AMCs (with the exception of Carolinas Healthcare) have the longest average outpatient case lengths with an average length of 139 minutes compared to an average of 104.5 minutes of the other Tier 1 facilities. Furthermore, the average outpatient case length at ASCs is equal to only 55.4 minutes (Attachment A). This distinction is important in acknowledging the difference in the type of case and patient that is served at an AMC as compared to a general acute care hospital or an ASC.

For this reason, WFBH proposes a need determination methodology in which a fifth tier is added for facilities with greater than 80,000 surgical hours. The current Tier 1 facilities range in surgical hours from a minimum of 43,744 to a maximum of 127,921. That results in a range of 84,147 hours within the tier. By contrast, the Tier 2 range is 10,048 hours and the Tier 3 range is 14,300 hours. (see Attachment B).

Facilities in the new Tier 1 (80,000+ surgical hours, Attachment C) would utilize a Facility-Based Need Determination with a utilization threshold of 80%, 10 hours per day and 260 days per year. AC-3 rooms would be counted in the inventory and the procedures performed in them would be reported in this model. Rounding would occur at fractional values of 0.50 and greater. An example of the need calculation applied to the new Tier 1 facilities (80,000+ surgical hours) is provided in Attachment C.

WFBH further proposes that for this new Tier 1, only the facility generating the need for operating rooms would be able to apply for the rooms. In this instance, it is the highly-acute, complex, and complicated cases that create longer case lengths and the need for additional ORs. If the SMFP need determination makes these ORs available for any facility, including a proposed ASC, the needs of the patients of the service area would not be served, as these providers would not be able to deliver care to the complex and complicated patients that created the need generation.

¹ Dexter et al., AANA J. 2001 Apr;69(2):120-3.

Comments on Proposed Models

Of Models 1-5 proposed, WFBH believes Model 2, which utilizes tiered case times and an 80% utilization threshold, is the best option. The 80% threshold coupled with 10 hour days and 260 days per year creates a fair target of 2,080 hours per room while still allowing facilities capacity to grow in the interim years between need determination and project implementation. Based on the 2016 LRA reported lengths, all of the newly proposed Tier 1 Facilities exceeded 2,080 hours per room during FFY 2015 (Attachment D).

WFBH is in support of including AC-3 ORs and their utilization in the need determination calculations.

Attachment A
Average Outpatient Case Lengths

Tier 1 Facilities Average Case Length

Facility	Average Outpatient Case Length	
Carolinas Medical Center	149	Average = 139 Minutes
Duke University Hospital	140	
University of North Carolina	137	
North Carolina Baptist Hospital	135	
Vidant Medical Center	134	
WakeMed	124	Average = 104.5 Minutes
Cone Health	114	
Rex Hospital	103	
Novant Health Presbyterian Medical Center	101	
New Hanover Regional	99	
Mission Hospital	97	
Novant Health Forsyth Medical	93	

ASC Average Case Lengths

Facility	Average Outpatient Case Length
Asheville Eye Surgery Center	110
Blue Ridge Surgery Center	105
Capital City Surgery Center	90
Carolina Center for Specialty	85
CaroMont Specialty Surgery	82
Charlotte Surgery Center	79
Eastern Regional Surgical	74
Eye Surgery Center and Laser	71
Eye Surgery Center of Shelby	68
Fayetteville Ambulatory	64
Gateway Surgery Center	64
Graystone Eye Surgery Center	61
Greensboro Specialty Surgical	60
High Point Surgery Center	60
Iredell Head Neck and Ear	60
James E. Davis Ambulatory	60
Matthews Surgery Center	59
Novant Health Ballantyne	58
Novant Health Huntersville	57
Orthopaedic Surgery Center of	57
Raleigh Orthopaedic Surgery	51
Rex Surgery Center of Cary	48
SouthPark Surgery Center	45

Attachment A
Average Outpatient Case Lengths

Facility	Average Outpatient Case Length
Surgery Center of Morganton	45
Surgery Center of Pinehurst	40
Surgical Center of Greensboro	35
Surgical Eye Center	34
The Eye Surgery Center of the	32
Southeastern Health Park	30
Morehead City	30
Union West Surgery Center	30
Vidant SurgiCenter	30
Viewmont Surgery Center	26
Wilmington SurgCare	20
Wilson OB-GYN	20
Average	55.4

Attachment B

Total Case Hours by Facility and Tier with Minimum, Maximum, and Range (as Proposed by OR Methodology Workgroup)

Location	Facility Name	Tier	Total Hours	
Mecklenburg	Carolinas Medical Center	1	127,262	
Guilford	Cone Health	1	64,672	
Durham	Duke University Hospital	1	127,921	
Buncombe	Mission Hospital	1	69,999	
New Hanover	New Hanover Regional Medical Center	1	66,344	Minimum = 43,774
Forsyth	North Carolina Baptist Hospital	1	101,315	Maximum = 127,921
Forsyth	Novant Health Forsyth Medical Center	1	54,645	Range = 84,147
Mecklenburg	Novant Health Presbyterian Medical Center	1	56,709	
Wake	Rex Hospital	1	45,841	
Orange	University of North Carolina Hospitals	1	88,821	
Pitt	Vidant Medical Center	1	57,286	
Wake	WakeMed	1	43,774	
Number of Facilities in Tier		12		
Cumberland	Cape Fear Valley Medical Center	2	25,673	Minimum = 18,673
Cabarrus	Carolinas HealthCare System NorthEast	2	20,608	Maximum = 28,720
Gaston	CaroMont Regional Medical Center	2	18,699	Range = 10,048
Wake	Duke Raleigh Hospital	2	28,720	
Durham	Duke Regional Hospital	2	21,079	
Moore	FirstHealth Moore Regional Hospital	2	20,956	
Forsyth	Novant Health Medical Park Hospital	2	18,673	
Number of Facilities in Tier		7		
Alamance	Alamance Regional Medical Center	3	14,341	Minimum = 41
Alleghany	Alleghany Memorial Hospital	3	379	Maximum = 14,341
Macon	Angel Medical Center	3	3,694	Range = 14,300
Rockingham	Annie Penn Hospital	3	3,389	
Ashe	Ashe Memorial Hospital	3	1,640	
Harnett	Betsy Johnson Hospital	3	4,694	
Mitchell	Blue Ridge Regional Hospital	3	1,317	
Caldwell	Caldwell Memorial Hospital	3	6,209	
Hoke	Cape Fear Valley Hoke Hospital	3	222	
Bladen	Cape Fear Valley-Bladen County Hospital	3	1,032	
Craven	CarolinaEast Medical Center	3	12,537	
Stanly	Carolinas HealthCare System - Stanly	3	2,141	
Anson	Carolinas HealthCare System Anson	3	41	
	Carolinas HealthCare System			

Attachment B

Total Case Hours by Facility and Tier with Minimum, Maximum, and Range (as Proposed by OR Methodology Workgroup)

Location	Facility Name	Tier	Total Hours
Burke	Blue Ridge	3	9,260
Cleveland	Carolinas HealthCare System Cleveland	3	10,072
Cleveland	Carolinas HealthCare System Kings Mountain	3	959
Lincoln	Carolinas HealthCare System Lincoln	3	3,523
Mecklenburg	Carolinas Healthcare System Pineville	3	13,517
Union	Carolinas HealthCare System Union	3	7,653
Mecklenburg	Carolinas HealthCare System University	3	14,242
Carteret	Carteret General Hospital	3	5,454
Catawba	Catawba Valley Medical Center	3	9,738
Lee	Central Carolina Hospital	3	7,585
Avery	Charles A. Cannon, Jr. Memorial Hospital	3	328
Chatham	Chatham Hospital	3	898
Columbus	Columbus Regional Healthcare System	3	3,560
Davie	Davie Medical Center	3	2,386
Montgomery	FirstHealth Montgomery Memorial Hospital	3	235
Hoke	FirstHealth Moore Regional Hospital - Hoke Campus	3	170
Richmond	FirstHealth Richmond Memorial Hospital	3	1,580
Granville	Granville Health System	3	2,788
Halifax	Halifax Regional Medical Center	3	4,157
Jackson	Harris Regional Hospital	3	5,787
Haywood	Haywood Regional Medical Center	3	5,861
Guilford	High Point Regional Health	3	13,688
Cumberland	Highsmith-Rainey Specialty Hospital	3	4,753
Surry	Hugh Chatham Memorial Hospital	3	5,892
Iredell	Iredell Memorial Hospital	3	11,012
Brunswick	J. Arthur Doshier Memorial Hospital	3	1,741
Johnston	Johnston Health	3	7,897
Guilford	Kindred Hospital - Greensboro	3	230
Iredell	Lake Norman Regional Medical Center	3	10,655
Lenoir	Lenoir Memorial Hospital	3	5,013
Davidson	Lexington Medical Center	3	3,710
Henderson	Margaret R. Pardee Memorial Hospital	3	11,731
Vance	Maria Parham Medical Center	3	4,217
Martin	Martin General Hospital	3	1,099

Attachment B

Total Case Hours by Facility and Tier with Minimum, Maximum, and Range (as Proposed by OR Methodology Workgroup)

Location	Facility Name	Tier	Total Hours
Rockingham	Morehead Memorial Hospital	3	4,524
Cherokee	Murphy Medical Center	3	5,478
Nash	Nash General Hospital	3	10,823
Durham	North Carolina Specialty Hospital	3	9,997
Surry	Northern Hospital of Surry County	3	5,174
Brunswick	Novant Health Brunswick Medical Center	3	5,828
Franklin	Novant Health Franklin Medical Center (closed)	3	1,031
Mecklenburg	Novant Health Huntersville Medical Center	3	8,907
Mecklenburg	Novant Health Matthews Medical Center	3	7,536
Rowan	Novant Health Rowan Medical Center	3	12,810
Davidson	Novant Health Thomasville Medical Center	3	3,626
Onslow	Onslow Memorial Hospital	3	7,644
Henderson	Park Ridge Health	3	7,603
Pender	Pender Memorial Hospital	3	144
Person	Person Memorial Hospital	3	1,779
Stokes	Pioneer Community Hospital of Stokes	3	504
Randolph	Randolph Hospital	3	6,513
Rutherford	Rutherford Regional Medical Center	3	3,244
Sampson	Sampson Regional Medical Center	3	2,101
Scotland	Scotland Memorial Hospital	3	6,466
Pasquotank	Sentara Albemarle Medical Center	3	4,523
Robeson	Southeastern Regional Medical Center	3	10,125
Polk	St. Luke's Hospital	3	1,398
McDowell	The McDowell Hospital	3	1,805
Dare	The Outer Banks Hospital	3	2,047
Transylvania	Transylvania Regional Hospital	3	2,402
Beaufort	Vidant Beaufort Hospital	3	4,524
Bertie	Vidant Bertie Hospital	3	650
Chowan	Vidant Chowan Hospital	3	841
Duplin	Vidant Duplin Hospital	3	2,211
Edgecombe	Vidant Edgecombe Hospital	3	2,259
Hertford	Vidant Roanoke-Chowan Hospital	3	2,338
Wake	WakeMed Cary Hospital	3	5,963
Watauga	Watauga Medical Center	3	10,233
Wayne	Wayne Memorial Hospital	3	10,457
Wilkes	Wilkes Regional Medical Center	3	4,849
Wilson	Wilson Medical Center	3	3,737
Number of Facilities in Tier		84	

Attachment C
Proposed New Tier 1 and Tier 2 Assignments

Location	Facility Name	Tier	Total Hours
Durham	Duke University Hospital	1	127,921
Mecklenburg	Carolinas Medical Center	1	127,262
Forsyth	North Carolina Baptist Hospital	1	101,315
Orange	University of North Carolina Hospitals	1	88,821
Buncombe	Mission Hospital	2	69,999
New Hanover	New Hanover Regional Medical Center	2	66,344
Guilford	Cone Health	2	64,672
Pitt	Vidant Medical Center	2	57,286
Mecklenburg	Novant Health Presbyterian Medical Center	2	56,709
Forsyth	Novant Health Forsyth Medical Center	2	54,645
Wake	Rex Hospital	2	45,841
Wake	WakeMed	2	43,774

Attachment D
 Facility Based Methodology Example

Facility	Total Surgical Hours	Population Growth Rate	Projected Surgical Hours	Projected ORs Needed	Planning Inventory	AC-3 Rooms	Deficit / Surplus	Facility Need
Carolinas Medical Center	127,262	8.5%	138,079	66.4	55	-	11.4	11
Duke University Hospital	127,921	7.52%	137,541	66.1	48	16	2.1	2
North Carolina Baptist Hospital	101,315	4.28%	105,651	50.8	38	7	5.8	6
University of North Carolina Hospitals	88,821	4.7%	92,995	44.7	41	-	3.7	4

Attachment E
Hours per Room

Facility	Total Surgical Hours	Planning Inventory	Hours per Room
Carolinas Medical Center	127,262	55	2,314
Duke University Hospital	127,921	48	2,665
North Carolina Baptist Hospital	101,315	38	2,666
University of North Carolina Hospitals	88,821	41	2,166