

Department of Radiation Oncology

CLINICAL FACULTY

Edward G. Shaw, M.D.

Chair

(336) 713-6506

A. William Blackstock Jr., M.D.

(336) 713-6560

Daniel B. Fried, M.D., Ph.D.

(336) 713-6560

Kathryn M. Greven, M.D.

(336) 713-6560

Janet K. Horton, M.D.

(336) 713-6560

M. Ann McCarty, M.S., P.A.-C.

(336) 713-6560

Kevin P. McMullen, M.D.

(336) 713-6505

Volker W. Stieber, M.D.

(336) 713-6505

SECTION OF CLINICAL RADIATION PHYSICS

(336) 713-6508

Allan F. deGuzman, Ph.D.

Section Head, Clinical Physics

Alan H. Baydush, Ph.D.

Kenneth E. Ekstrand, Ph.D.

Carnel J. Hampton, Ph.D.

William H. Hinson, Ph.D.

William T. Kearns, M.S.

Mahta Mirzaei-McKee, M.S.

Michael T. Munley, Ph.D.

SECTION OF RADIATION PHYSICS RESEARCH AND EDUCATION

(336) 713-6508

J. Daniel Bourland, Ph.D.

Section Head, Physics Research

Jian-Ming Zhu, Ph.D.

SECTION OF RADIATION BIOLOGY

(336) 713-7638

Michael E. C. Robbins, Ph.D.

Section Head

Linda J. Metheny-Barlow, Ph.D.

Weiling Zhao, Ph.D.

ADMINISTRATIVE FACULTY

(336) 713-6526

R. Scott Krewson, CPA, MBA

Business Administrator

AFFILIATED PRACTICES

High Point Regional Hospital

(336) 878-6036 • Fax: (336) 878-6704

Bart A. Frizzell, M.D.

Medical Director

James A. Palermo, M.D.

Charles M. Able, M.S.

Megan M. Bright, M.S.

Hugh Chatham Memorial Hospital

(336) 527-7577 • Fax: (336) 527-7442

Gregory L. Fiets, M.D.

Medical Director

Caldwell Memorial Hospital

(828) 759-4960 • Fax: (828) 759-4961

Theodore E. Yaeger, M.D.

Medical Director

Michael D. Thomas, M.S.

July 30, 2008

Ms. Carol G. Potter
NC Division of Health Service Regulation
Medical Facilities Planning Section
701 Barbour Drive
Raleigh, NC 27603

Dear Ms. Potter:

I am writing to express my deep concern regarding a proposal for a linear accelerator to be installed in a urology outpatient facility in Wake County. Currently, radiation treatments are delivered as part of the multidisciplinary care of cancer patients by radiation oncologists. The proposed linac facility is within 2 miles of a current facility that is already providing care. In addition, Wake county is already well-served by 4 linac centers capable of IMRT/IGRT therapy for prostate cancer, which bracket the proposed center at Cary Urology. In addition, there are 2 academic centers of excellence (UNC and Duke) which are located nearby in the Research Triangle area. All of these facilities accept indigent patients.

Adding an extra linear accelerator in a Service Area where the present State formula documents that no need exists will sap patients and resources from existing linear accelerator facilities. Organ-specific linear accelerator centers do not provide better outcomes than comprehensive community or academic centers and could lead to a statewide proliferation of linear accelerators (undermining the existing allocation formula for linac CON's in North Carolina). In addition, linac facilities owned by referring physicians create a lucrative opportunity for self-referral. Medicare is currently reviewing whether the current "ancillary service" exemption enjoyed by such facilities should be eliminated.

Cancer care of patients needs to remain in the care of physicians who are able to manage all sites of disease in a comprehensive fashion. I believe it is a dangerous precedent to allow a facility that will only be caring for urologic cancer.

Sincerely,



Kathryn Greven, M.D.
Professor
Department of Radiation Oncology

Wake Forest University Health Sciences

Medical Center Boulevard • Winston-Salem, North Carolina 27157-1030
Clinic (336) 713-3600 • Fax (336) 713-6622 • Chairman's Office (336) 713-6506 • Univ. (336) 713-6510

WAKE FOREST

SCHOOL of MEDICINE
THE BOWMAN GRAY CAMPUS