



Wake Forest University Baptist

Michael L. Freeman
Vice President
Strategic Planning

Telephone: (336) 716-5097
Fax: (336) 716-2879
freeman@wfubmc.edu

DFS Health Planning
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Medical Facilities
PLANNING SECTION

August 28, 2008

Dr. Dan A. Myers, Chairman
State Health Coordinating Council
Division of Health Service Regulation
2714 Mail Service Center
Raleigh, NC 27699-214

RE: Comments Regarding Table Novant Health's 2009 Proposed State Medical Hospital Plan Petition for Adjusted Bed Need in two counties- Forsyth and Mecklenburg Counties.

Dear Dr. Myers,

I would like to take this opportunity on behalf of Wake Forest University Baptist Medical Center to continue to thank the SHCC and State Medical Facilities Planners for all their time and effort in continuing to advance the State Medical Facilities Plan in order to promote access, quality and cost efficient healthcare services for all North Carolinians. It is important for hospitals, physicians and other providers to work with the State to provide the most accurate and credible data in all areas to ensure that appropriate planning takes place and that the healthcare needs of the citizens of North Carolina are met. I am respectfully submitting comments on the petition filed by Novant Health on August 1 for an adjusted bed need in Forsyth and Mecklenburg counties. My concerns are outlined in the following comments:

Wake Forest University Baptist Medical Center (WFUBMC) agrees that the State Acute Care Need Methodology needs to be revised to reflect a statewide growth factor that is in line with actual population and inpatient utilization trends. The current applied statewide growth factor has consistently declined over the last three years and WFUBMC agrees that the larger urban counties have been lagging behind the actual market demand for new beds.

However, WFUBMC is not in favor of the Novant's petition at this time because the methodology proposed has not been vetted through the North Carolina Hospital Association or the State Medical Facilities Planning section. WFUBMC would like to recommend the SHCC appoint an acute care workgroup to review the bed need methodology that includes a broad cross section of both providers and regulators.

In conclusion, WFUBMC welcomes the prospect of revising the acute care need methodology, but is concerned with the integrity of the alternate methodology proposed by Novant. We want a revised methodology to accurately reflect true utilization and resources for all North Carolina hospitals. Thank you for the opportunity to voice my concerns through these comments.

Sincerely,

Michael L. Freeman
Vice President, Strategic Planning
North Carolina Baptist Hospital

Wake Forest University Health Sciences
North Carolina Baptist Hospital

Medical Center Boulevard • Winston-Salem, North Carolina 27157