

Comment on Petition from Affordable Health Care Facilities

Submitted to

Dr. Sandra B. Greene., Chair
Acute Care Services Committee
c/o Medical Facilities Planning Section
Division of Health Service Regulation
2714 Mail Service Center
Raleigh, NC 27699-2714

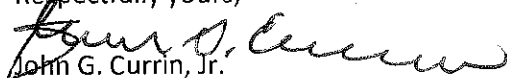
Submitted by

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Alamance Regional Medical Center (ARMC) is filing these comments in response to a petition filed by Affordable Health Care Facilities (AHCF), which proposes to expand the Single Specialty Demonstration Project to include numerous other counties, including Alamance County. ARMC notes that the petition is similar to other petitions filed by AHCF, whose recommendations have been examined by the workgroup as well as the Acute Care Services Committee. Many of these suggestions have been incorporated into the Demonstration Project that is currently in the *Proposed 2010 SMFP*. ARMC believes that the rejected portions of AHCF's petitions were carefully considered and correctly left out of the Demonstration Project.

If approved, the petition would open Alamance County for the development of an ASC, without any consideration for the need of the patient population, or lack thereof. ARMC, in joint venture with some of its physicians, developed a freestanding Ambulatory Surgery Center in the county, which is still within its first three project years. Expanding the Demonstration Project as proposed could endanger the success of this ASC by unnecessarily duplicating existing health services, again without any consideration for the true need of the patient population. In addition, a new single-specialty ASC for gastrointestinal endoscopy was recently developed in Alamance County, which represents a freestanding, non-hospital provider. Thus, the need for additional single specialty ASC's in Alamance County is not demonstrated in this petition. ARMC believes that a limited Demonstration Project, such as that shown in the *Proposed 2010 SMFP*, is the best approach to determining the long-term need for similar Single Specialty ASC's, compared to the approach favored by AHCF, and hopes that the SHCC will deny the petition.

Respectfully yours,


John G. Currin, Jr.

President