

March 22, 2011

E-Mail Delivery To: DHSR.SMFP.Petitions-Comments@dhhs.nc.gov

North Carolina Division of Health Service Regulation

Medical Facilities Planning Section

Council Building

701 Barbour Drive

Raleigh, NC 27603

Re: Opposition to Novant Health, Inc.'s Petition Concerning SMFP Policy AC-3

Dear Sir or Madam,

On behalf of Heritage Hospital, I am writing to relay our opposition to the Petition filed on March 2, 2011, by Novant Health, Inc., which effectively seeks to repeal or render useless Policy AC-3 in the 2012 State Medical Facilities Plan ("SMFP").

The Academic Medical Center Teaching Hospitals ("AMCs") play a unique and important role in North Carolina's health system. We regularly refer patients to Pitt County Memorial Hospital, and rely upon all the AMCs to educate and teach health care professionals that provide services in our facility. The AMCs provide a valuable service to the State of North Carolina in their teaching role and as a referral base. Further, the AMCs perform valuable research activities that, in turn, lead to new technologies and treatment methods which are sometimes implemented down the road in non-AMC facilities. All of this has improved patient care.

In our view, it would be detrimental to health service in North Carolina for Policy AC-3 to be repealed or rendered ineffective as sought by Novant. Policy AC-3 works to provide the AMCs with an avenue to expand their facilities for teaching or research purposes. Therefore, we ask that Novant's Petition be denied.

Sincerely,

Wick Baker
President