



March 22, 2011

By 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: Comments in Support of Petition for Change in Policy AC-3 Filed by Duke, Baptist, Pitt and UNC; and Opposition to Petition regarding Policy AC-3 Filed by Novant Health, Inc.

Dear Sir or Madam:

Johnston Health supports the Petition filed by Duke University Health System d/b/a Duke University Hospital ("Duke"), North Carolina Baptist Hospital ("Baptist"), Pitt County Memorial Hospital ("Pitt"), and UNC Hospitals at Chapel Hill ("UNC"), to change Policy AC-3 in the State Medical Facilities Plan ("SMFP"). We also oppose the separate Petition filed by Novant Health, Inc. ("Novant") that seeks to invalidate or render effectively useless Policy AC-3 in the SMFP.

Policy AC-3 serves an important purpose as it enables Academic Medical Center Teaching Hospitals ("AMCs") to meet their teaching and research functions. We often refer patients to the AMCs and rely upon them to produce medical staff capable of treating patients at our facility.

The proposed revisions to Policy AC-3 set forth in the Petition of Duke, Baptist, Pitt and UNC enhances the existing Policy AC-3, and should be approved. In contrast, Novant's Petition to dismantle Policy AC-3 should be rejected. Novant's Petition would extinguish the Policy AC-3 option afforded to AMCs, and curtail their ability to maintain adequate teaching and research functions that serve as a benefit to the citizens of North Carolina and the community hospitals that exist within North Carolina.

Thank you for your consideration of these comments.

Sincerely,

Ralph L. Stewart, Jr.
Chair, Board of Commissioners