

**Harnett Health**

From the Office of the President and CEO

TO: North Carolina State Health Coordination Council
FROM: Ken Bryan, President and CEO, Harnett Health System
RE: Comments on Proposed 2014 State Medical Facilities Plan
Date: July 31, 2013

While many comments and petitions submitted regarding Proposed State Medical Facility Plans point to problems with methodology and seek adjustments to need determinations, our comments are just the opposite. We wish to acknowledge the innovative and flexible methodology that governs the allocation of linear accelerators.

The criteria used in the methodology incorporate efficiency, existing utilization patterns, and geographic accessibility factors in a way that effectively addresses need in differing types of service areas. Recognizing that some areas would never receive an allocation if only utilization measures were applied, it allows a new service area to be established when a population threshold is reached.

Harnett County has reached the 120,000 threshold and becomes new Service Area 21 in the Proposed 2014 SMFP. This is good news as an important medical service will be available to Harnett County residents, some who may be critically ill, closer to where they live. Because this is primarily an outpatient service that requires multiple visits over a period of time, having it in reasonable travel distance is important.

Preliminary market data analysis indicates anticipated volumes sufficient to meet established thresholds.

Harnett Health strongly supports the current linear accelerator methodology and this need allocation for 2014.