



August 11, 2015

Dr. Christopher Ullrich, Chair, SHCC
c/o North Carolina Division of Health Service Regulation
Healthcare Planning and Certificate of Need Section
2714 Mail Service Center
Raleigh, North Carolina 27699-2714

Dear Dr. Ullrich:

I am writing to express my support for a petition filed by LifeCare Hospitals of North Carolina requesting the allocation of additional skilled nursing beds in Nash County for the treatment of patients needing specialized care. As described in LifeCare's petition, patients with many different types of conditions are not being accepted by most skilled nursing facilities, even though they are no longer in need of an acute level of care. As a result, patients in need of sub-acute care must stay in short- and long-term acute care hospitals, preventing patients from receiving care in the most appropriate setting and adding unnecessary costs to the healthcare system.

As you are aware, UNC Hospitals recognized this issue and petitioned last year for a new policy to expand access to ventilator beds in skilled nursing facilities. In the Agency report on our petition, the Agency agreed that additional ventilator beds are needed, and urged providers to petition for a special need determination for these beds, similar to what LifeCare has done through its petition. While LifeCare proposes that the additional beds be available for ventilator patients, the LifeCare petition would also provide much-needed access to skilled nursing beds for patients with other types of special needs, such as those needing dialysis, patients with tracheostomies, bariatric patients, those with complex wounds and in need of TPN. As noted in our petition filed last year, UNC Hospitals estimates that based solely on its ventilator patients, as many as 55 SNF beds could be filled with its patients, and considering patients with the additional needs described in LifeCare's petition, even more are needed.

UNC Hospitals and many of its affiliated hospitals refer patients to LifeCare regularly for LTCH care. While the approval of this petition would not guarantee that LifeCare would ultimately receive a CON for these beds, we believe that LifeCare's petition presents a compelling case for a special need for the allocation of these beds, and we fully support the approval of its petition.

Please let me know if I can be of further assistance in your efforts.

Sincerely,

A handwritten signature in black ink that reads "Gary L. Park".

Gary L. Park
President, UNC Hospitals