

North Carolina State Health Coordinating Council
c/o Certificate of Need and Health Planning Section
Division of Health Service Regulation

**RE: Novant Health/HealthSouth Inpatient Rehabilitation Petition – Adjusted Need
Determination for HSA III in the Proposed 2018 SMFP**

Public Hearing Comments

Good afternoon. I am Laurie McWilliams. I am a board-certified Neuro-intensivist at Novant Health Presbyterian Medical Center. In my position, I work with the patients and physicians associated with our newly certified Joint Commission Advanced Comprehensive Stroke Center. Our hospital is the only hospital in HSA III with this designation. In the last two and a half years, less than 40% of our stroke patients have been admitted to an inpatient rehabilitation hospital. One reason for this low admission percentage is the high utilization at the existing inpatient rehabilitation hospitals in Mecklenburg and surrounding counties. When we are successful in getting them admitted, we often experience delays in admitting them. Clearing the process to admit a patient to the existing inpatient rehabilitation hospitals involves considerable time, completing an admission process that should be seamless, but is not. As a neurointensivist, I have experienced long delays in the admission of my patients to the existing inpatient rehabilitation center in Mecklenburg County. Delaying admission to inpatient rehabilitation will deter post stroke rehabilitation with longer hospital stays, which in turn increases a patient's susceptibility to hospital-acquired infections; and results in disgruntled family members. One reason for the delay, in addition to high occupancy at the existing inpatient rehabilitation hospitals is their refusal to accept patients from our hospitals over the weekend. In addition, after the weekend a PT/OT evaluation in the past 24 hours so our staff re-evaluates the patient.

When the patient is re-evaluated by PT/OT on Monday, a patient could now meet criteria for discharge home when they should have been placed in an inpatient rehabilitation setting three days earlier. As a result, many of my patients are not receiving needed inpatient rehabilitation services. They are discharged home with home health or outpatient rehabilitation but this is not the same level of care. The patient does not receive the aggressive inpatient rehabilitation needed for their optimal post stroke recovery. Lastly, some of the patients don't have the resources or family support to go home, therefore they might end up in a skilled nursing facility, again, lacking the resources for their full recovery.

As Novant Health has expanded the neuroscience service line over the past year, our inpatient utilization for January to June of this year is 20% greater than the same timeframe in 2016. With our new designation as a comprehensive stroke center as of June 2017, our expected growth over the next year is budgeted to be an additional 10% in inpatient utilization of the neurosciences service line. With the increase in growth of patients, new expertise bringing in more resources to improve our patient's outcomes, more patients will be discharged from Novant Health Presbyterian Medical Center requiring acute inpatient rehabilitation services.

Lastly, once our patients are accepted into the Carolinas inpatient rehabilitation services, they are lost to follow up. The physicians don't receive reports or updates leading to a lack of continuity of care for the neurospecialists and the patient's primary care doctor, and lost patients. The lack of choice and competition in the market has impacted continuity of care for Novant Health patients in Mecklenburg and surrounding counties. We find it extremely difficult

to provide continuing care for patients in the Novant Health system when they are transferred to another system's inpatient rehabilitation unit for two to three weeks, or longer.

We have included letters of support from many of the physicians associated with the stroke program in our petition. We all support the development of a new inpatient rehabilitation hospital that will support and accept more patients from Novant Health hospitals. Thank you very much for allowing us to present this information about our Petition today.