

NORTH CAROLINA STATE HEALTH COORDINATING COUNCIL

**PETITION FOR ADJUSTED NEED DETERMINATION IN BRUNSWICK COUNTY  
FOR OPERATING ROOMS**

Petitioner Brunswick Community Hospital, LLC dba Novant Health Brunswick Medical Center (“NHBMC”) hereby submits this petition for modification to the need determination for two (2) operating rooms in Brunswick County within the *2020 State Medical Facilities Plan*.

**Petitioner:**

Brunswick Community Hospital, LLC dba Novant Health Brunswick Medical Center  
240 Hospital Drive  
Bolivia, NC 28422

Contact: Andrea Gymer  
Vice President, Operational Planning and Innovation  
(336) 277-1523  
agymer@novanthealth.org

**Statement of the Requested Adjustment:**

NHBMC requests that the *2020 State Medical Facilities Plan* identify a need determination for two (2) operating rooms in Brunswick County (as reflected in Table 6C).

**Background:**

- **State Medical Facilities Plan**

Table 6B in the *Proposed 2020 State Medical Facilities Plan* identifies a need determination for zero (0) operating rooms in Brunswick County. This need determination is based on the standard methodology in Chapter 6. However, the standard methodology for Brunswick County contains a calculation error and the “Adjusted Case Time” has suppressed the operating room need in Brunswick County for three consecutive *State Medical Facilities Plans*.

The *2018 State Medical Facilities Plan* established a new standard methodology for determining operating room need. This standard need methodology takes into consideration the inpatient case time and ambulatory case time, which had been reported by hospitals for over a decade but never considered in the standard methodology. Step 3 – Determine Each Facility’s Adjusted Case Times was included to reduce dramatic increases and decreases in a facility’s case time. In the *2018 State Medical Facilities Plan*, Step 3 stated:

- a. For each facility, compare the “Average ‘Case Time’ in Minutes” for inpatient and ambulatory cases on the annual License Renewal Application to its average case time used in the methodology in the previous year’s State Medical Facilities Plan. (Note: For the 2018 State Medical Facilities Plan only, compare the case time reported on the 2017 License Renewal Application to the case time reported on the 2016 License Renewal Application.)
  - (1) If either the inpatient or ambulatory case time is more than 10% longer than the previous year’s case time, then the “Adjusted Case Time” is the previous year’s reported case time plus 10%.
  - (2) If either the inpatient or ambulatory case time is more than 20% shorter than the previous year’s case time, then the “Adjusted Case Time” is the previous year’s reported case time minus 20%.
  - (3) If neither of the above situations occurs, then the “Adjusted Case Time” is the average case time(s) reported on the License Renewal Application.

The following table shows the inpatient and ambulatory case times in minutes reported by NHBMC in its 2016 and 2017 License Renewal Applications:

<b>Case Time</b>	<b>2016 LRA</b>	<b>2017 LRA</b>	<b>Change</b>
Inpatient	123	144	17.1%
Ambulatory	67	96	43.3%

As a result of both case times being more than 10% longer than the previous year's case time, an "Adjusted Case Time" was calculated, as shown in the following table:

Case Time	2016 LRA	+ 10%	2018 SMFP Case Time
Inpatient	123	12.3	135.3
Ambulatory	67	6.7	73.7

The "Adjusted Case Time" resulted in no need determination for operating rooms in Brunswick County in the 2018 State Medical Facilities Plan as the following Table 6B shows:

A	B	C	D	E	F	G	H	I	J	K	L	M	N
Service Area	License	Facility	Inpatient Cases	Final Inpatient Case Time	Ambulatory Cases	Final Ambulatory Case Time	Total Adjusted Estimated Surgical Hours	Growth Factor	Projected Surgical Hours for 2022	Projected Surgical ORs Required in 2022	Adjusted Planning Inventory	Project OR Deficit/Surplus (Surplus shows as a "-")	Service Area Need
Brunswick	H0250	Novant Health Brunswick Medical Center~↑↑↑	1,052	135.3	3,326	73.7	6,458	10.12	7,111	4.74	4	0.74	0

However, if actual case times were utilized, then a need determination of two (2) operating rooms in Brunswick County would have been generated as the following Table 6B shows:

A	B	C	D	E	F	G	H	I	J	K	L	M	N
Service Area	License	Facility	Inpatient Cases	Final Inpatient Case Time	Ambulatory Cases	Final Ambulatory Case Time	Total Adjusted Estimated Surgical Hours	Growth Factor	Projected Surgical Hours for 2022	Projected Surgical ORs Required in 2022	Adjusted Planning Inventory	Project OR Deficit/Surplus (Surplus shows as a "-")	Service Area Need
Brunswick	H0250	Novant Health Brunswick Medical Center~↑↑↑	1,052	144	3,326	96	7,846	10.12	8,640	5.76	4	1.76	2

The *2019 State Medical Facilities Plan* Step 3 – Determine Each Facility’s Adjusted Case Times changed slightly in that it would not compare current case time reported in the License Renewal Application to the previous year’s reported License Renewal Application case times.

In the *2019 State Medical Facilities Plan*, Step 3 states:

- a. For each facility, compare the “Average ‘Case Time’ in Minutes” for inpatient and ambulatory cases on the annual License Renewal Application to its average case time used in the methodology in the previous year’s State Medical Facilities Plan.
  - (1) If either the inpatient or ambulatory case time is more than 10% longer than the previous year’s case time, then the “Adjusted Case Time” is the previous year’s reported case time plus 10%.
  - (2) If either the inpatient or ambulatory case time is more than 20% shorter than the previous year’s case time, then the “Adjusted Case Time” is the previous year’s reported case time minus 20%.
  - (3) If neither of the above situations occurs, then the “Adjusted Case Time” is the average case time(s) reported on the License Renewal Application.

The following table shows the inpatient and ambulatory case times in minutes comparison performed by the Agency:

Case Time	2018 SMFP	2018 LRA	Change
Inpatient	135.3	146	7.9%
Ambulatory	73.7	92	24.8%

As a result of ambulatory case times being more than 10% longer than the previous year’s case time, an “Adjusted Case Time” was calculated. However, as shown in the prior table, the Agency also adjusted the inpatient case time even though it was less than 10% higher than its average case time used in the methodology in the previous year’s State Medical Facilities Plan. The *2019 State Medical Facilities Plan* should have used the following case times:

Case Time	2018 SMFP	+ 10%	2018 LRA	2019 SMFP Case Time
Inpatient	135.3		146	146
Ambulatory	73.7	7.37		81.1

NHBMC is unable to duplicate the calculation for the inpatient “Adjusted Case Time” of 139.9 minutes used by the Agency in Table 6B of the *2019 State Medical Facilities Plan*, with the data available. The increase from 135.3 minutes in the *2018 State Medical Facilities Plan* to the 139.9 minutes in the *2019 State Medical Facilities Plan* is 4.6 minutes, which is 3.4% greater than the “average case time used in the methodology in the previous year’s State Medical Facilities Plan”.

The “Adjusted Case Time” resulted in no need determination for operating rooms in Brunswick County in the 2019 *State Medical*

*Facilities Plan* as the following Table 6B shows:

A	B	C	D	E	F	G	H	I	J	K	L	M	N
Service Area	License	Facility	Inpatient Cases	Final Inpatient Case Time	Ambulatory Cases	Final Ambulatory Case Time	Total Adjusted Estimated Surgical Hours	Growth Factor	Projected Surgical Hours for 2022	Projected Surgical ORs Required in 2022	Adjusted Planning Inventory	Project OR Deficit/Surplus (Surplus shows as a “-“)	Service Area Need
Brunswick	H0250	Novant Health Brunswick Medical Center <sup>^</sup> ↑↑↑	1,002	139.9	3,453	81.1	7,003	9.73	7,684	5.12	4	1.12	0

However, if actual case times were utilized, then a need determination of two (2) operating rooms in Brunswick County would have been

generated as the following Table 6B shows:

A	B	C	D	E	F	G	H	I	J	K	L	M	N
Service Area	License	Facility	Inpatient Cases	Final Inpatient Case Time	Ambulatory Cases	Final Ambulatory Case Time	Total Adjusted Estimated Surgical Hours	Growth Factor	Projected Surgical Hours for 2022	Projected Surgical ORs Required in 2022	Adjusted Planning Inventory	Project OR Deficit/Surplus (Surplus shows as a “-“)	Service Area Need
Brunswick	H0250	Novant Health Brunswick Medical Center <sup>^</sup> ↑↑↑	1,002	146	3,453	92	7,733	9.73	8,485	5.66	4	1.66	2

Nonetheless, even if the correct inpatient case time was utilized, then a need determination of two (2) operating rooms in Brunswick

County would have been generated as the following Table 6B shows:

A	B	C	D	E	F	G	H	I	J	K	L	M	N
Service Area	License	Facility	Inpatient Cases	Final Inpatient Case Time	Ambulatory Cases	Final Ambulatory Case Time	Total Adjusted Estimated Surgical Hours	Growth Factor	Projected Surgical Hours for 2022	Projected Surgical ORs Required in 2022	Adjusted Planning Inventory	Project OR Deficit/Surplus (Surplus shows as a "-")	Service Area Need
Brunswick	H0250	Novant Health Brunswick Medical Center <sup>~</sup> ↑↑↑	1,002	146	3,453	81.1	7,106	9.73	7,797	5.20	4	1.20	2

The *Proposed 2020 State Medical Facilities Plan* Step 3 – Determine Each Facility’s Adjusted Case Times is identical to the *2019 State Medical Facilities Plan* except it is referred to as Step 2 of the standard methodology.

In the *2020 State Medical Facilities Plan*, Step 2 states:

- a. For each facility, compare the “Average ‘Case Time’ in Minutes” for inpatient and ambulatory cases on the annual License Renewal Application to its average case time used in the methodology in the previous year’s State Medical Facilities Plan.
  - (1) If either the inpatient or ambulatory case time is more than 10% longer than the previous year’s case time, then the “Adjusted Case Time” is the previous year’s reported case time plus 10%.
  - (2) If either the inpatient or ambulatory case time is more than 20% shorter than the previous year’s case time, then the “Adjusted Case Time” is the previous year’s reported case time minus 20%.
  - (3) If neither of the above situations occurs, then the “Adjusted Case Time” is the average case time(s) reported on the License Renewal Application.

The following table shows the inpatient and ambulatory case times in minutes comparison that should have been performed by the Agency, using the erroneous inpatient “adjusted case time” from the *2019 State Medical Facilities Plan*:

<b>Case Time</b>	<b>2019 SMFP</b>	<b>2019 LRA</b>	<b>Change</b>
Inpatient	139.9	142	1.5%
Ambulatory	81.1	94	15.9%

As a result of the ambulatory case time being more than 10% longer than the previous year’s case time, an “Adjusted Case Time” needs to be calculated. Once again, as shown in the previous table, the Agency also adjusted the inpatient case time even though it was less than 10% higher than “the average case time used in the methodology in the previous year’s State Medical Facilities Plan.” In fact, the Agency decreased the inpatient case time from 139.9 minutes in the *2019 State Medical Facilities Plan* to 137.7 minutes for the *Proposed 2020 State Medical Facilities Plan*.

The *Proposed 2020 State Medical Facilities Plan* should use the following case times:

<b>Case Time</b>	<b>2019 SMFP</b>	<b>+ 10%</b>	<b>2019 LRA</b>	<b>2020 SMFP Case Time</b>
Inpatient	139.9		142	142
Ambulatory	81.1	8.11		89.2

But instead, the *Proposed 2020 State Medical Facilities Plan* uses the following case times:

<b>Case Time</b>	<b>2019 SMFP</b>	<b>+ 10%</b>	<b>2019 LRA</b>	<b>2020 SMFP Case Time</b>
Inpatient	139.9	???	142	137.7
Ambulatory	81.1	8.11		89.2

NHBMC is unable to duplicate the calculation for the inpatient “Adjusted Case Time” of 137.7 minutes used by the Agency in Table 6B of the *Proposed 2020 State Medical Facilities Plan*, with the data available. This represents a 1.6% decrease from the *2019 State Medical Facilities Plan* inpatient case time of 139.9 minutes.



The “Adjusted Case Time” results in no need determination for operating rooms in Brunswick County in the *Proposed 2020 State Medical*

*Facilities Plan* as the following Table 6B shows:

A	B	C	D	E	F	G	H	I	J	K	L	M	N
Service Area	License	Facility	Inpatient Cases	Final Inpatient Case Time	Ambulatory Cases	Final Ambulatory Case Time	Total Adjusted Estimated Surgical Hours	Growth Factor	Projected Surgical Hours for 2022	Projected Surgical ORs Required in 2022	Adjusted Planning Inventory	Project OR Deficit/Surplus (Surplus shows as a “-“)	Service Area Need
Brunswick	H0250	Novant Health Brunswick Medical Center <sup>^</sup> ↑↑↑	902	137.7	3,287	89.2	6,956	10.05	7,655	5.10	4	1.10	0

However, for the third year in a row, if actual case times were utilized, then a need determination of two (2) operating rooms in Brunswick

County is generated as the following Table 6B shows:

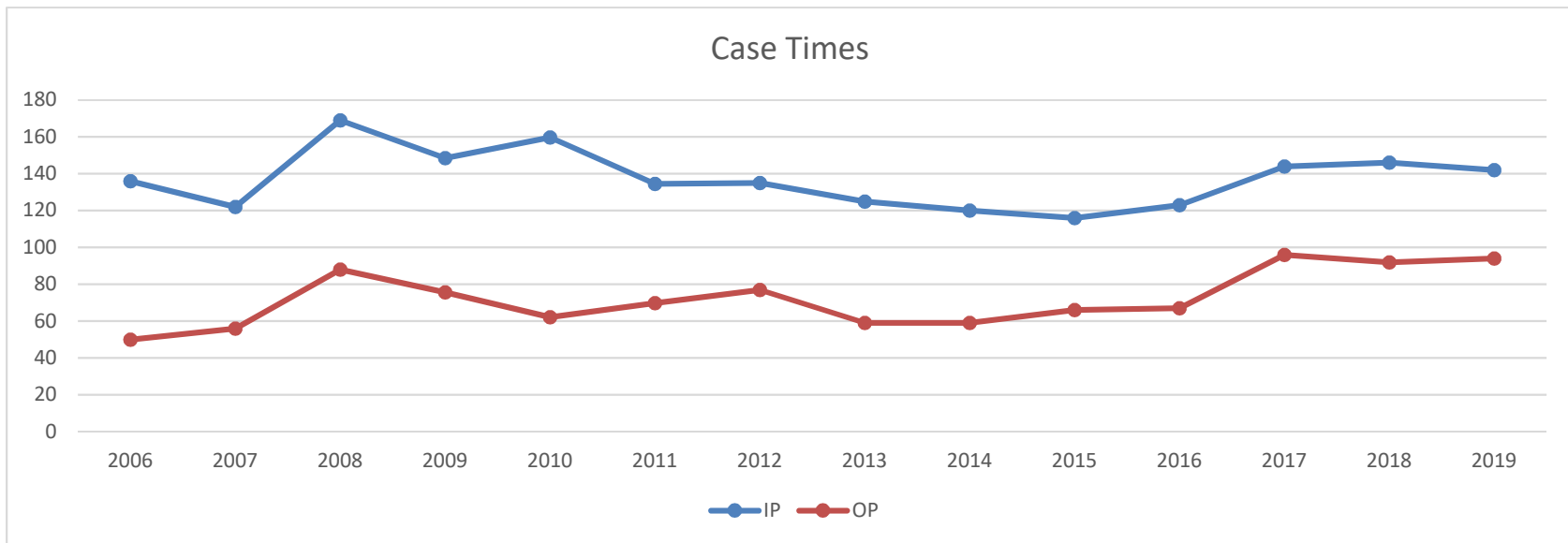
A	B	C	D	E	F	G	H	I	J	K	L	M	N
Service Area	License	Facility	Inpatient Cases	Final Inpatient Case Time	Ambulatory Cases	Final Ambulatory Case Time	Total Adjusted Estimated Surgical Hours	Growth Factor	Projected Surgical Hours for 2022	Projected Surgical ORs Required in 2022	Adjusted Planning Inventory	Project OR Deficit/Surplus (Surplus shows as a “-“)	Service Area Need
Brunswick	H0250	Novant Health Brunswick Medical Center <sup>^</sup> ↑↑↑	902	142	3,287	94	7,284	10.05	8,016	5.34	4	1.34	2

Unfortunately, even if the correct inpatient case time of 142 minutes is utilized, then NHBMC is for the third year negatively impacted by the “Adjusted Case Time” for ambulatory cases as the following Table 6B shows:

A	B	C	D	E	F	G	H	I	J	K	L	M	N
Service Area	License	Facility	Inpatient Cases	Final Inpatient Case Time	Ambulatory Cases	Final Ambulatory Case Time	Total Adjusted Estimated Surgical Hours	Growth Factor	Projected Surgical Hours for 2022	Projected Surgical ORs Required in 2022	Adjusted Planning Inventory	Project OR Deficit/Surplus (Surplus shows as a “-“)	Service Area Need
Brunswick	H0250	Novant Health Brunswick Medical Center <sup>~</sup> ↑↑↑	902	142	3,287	89.2	7,021	10.05	7,727	5.15	4	1.15	0

An analysis of the inpatient and ambulatory case times, beginning in 2006 or five years before the operation of the new medical center in Bolivia, indicates that the most recent three-year period (2017-2019) has been the most consistent in inpatient and ambulatory case times as the following table and graph indicate:

Case Times	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
<b>Inpatient</b>	136	122	169	148.5	159.8	134.6	135	125	120	116	123	144	146	142
<b>Ambulatory</b>	50	56	88	75.6	62.1	69.8	77	59	59	66	67	96	92	94
<b>Inpatient % Change</b>			24.3%	21.7%	-5.4%	-9.4%	-15.5%	-7.1%	-11.1%	-7.2%	2.5%	24.1%	18.7%	-1.4%
<b>Ambulatory % Change</b>			76.0%	35.0%	-29.4%	-7.7%	24.0%	-15.5%	-23.4%	11.9%	13.6%	45.5%	37.3%	-2.1%



- **Brunswick County Population Growth**

From 2014 to 2019, the population of Brunswick County grew by 17.3 percent. Based on NCOSBM projections, Brunswick County’s population is projected to increase by 11.9 percent from 2019 to 2024. In particular:

- The 45-64 population grew by 11.0 percent from 2014 to 2019, representing 26.8 percent of Brunswick County’s population. NCOSBM projects that the 45-64 population will increase by 8.1 percent from 2019 to 2024.
- The elderly population (65+ years old) grew by 34.3 percent from 2014 to 2019, to represent 30.4 percent of Brunswick County’s total population. NCOSBM projects that the elderly population will be the fastest growing population, increasing by 20.5 percent from 2019 to 2024, to become 32.7 percent of Brunswick County’s total population.

**Population Growth  
Brunswick County**

	2014	2019	2024 (Projected)	2014 - 2019	2019 - 2024
				Percent Growth	Percent Growth
<18 Population	21,182	22,710	23,531	7.2%	3.6%
18-44 Population	32,678	37,247	41,316	14.0%	10.9%
45-64 Population	33,696	37,408	40,456	11.0%	8.1%
65+ Population	31,609	42,464	51,163	34.3%	20.5%
<b>Total Population</b>	<b>119,165</b>	<b>139,829</b>	<b>156,466</b>	<b>17.3%</b>	<b>11.9%</b>
Percent <18	17.8%	16.2%	15.0%		
Percent 18-44	27.4%	26.6%	26.4%		
Percent 45-64	28.3%	26.8%	25.9%		
Percent 65+	26.5%	30.4%	32.7%		

Source: NC Office of State Budget and Management, December 3, 2018.

It should be noted that although the 65+ age group currently accounts for only 30.4 percent of the Brunswick County’s population in 2019, the 65+ age group currently accounts for 53.9 percent of surgery cases performed at NHBMC. The 65+ population is also projected to experience the largest growth. This high demand for surgical services is due to increased surgical services that this age group requires.

- **Physician Recruitment**

From July 2014 to the present, NHBMC has added 12 new surgeons, not including Gastroenterologists, to the medical staff. The surgeons are in the following specialties; ENT, General Surgery (2), OB/GYN (2), Oral & Maxillofacial, Orthopaedic, Orthopaedic Spine/Neuro, Pediatric Dentistry (2), Plastic, and Urology.

NHBMC is the only facility in North Carolina that shows a deficit of operating rooms. If both its current inpatient and ambulatory case times were utilized, the standard methodology would generate a need for operating rooms in the *Proposed 2020 State Medical Facilities Plan*. As a result of the *Proposed 2020 State Medical Facilities Plan* utilizing 89.2 minutes per ambulatory case, whereas NHBMC is actually at 94 minutes per ambulatory case, no operating room need determination is identified. 91.4 minutes per ambulatory case is the point at which an operating room need determination would be generated. NHBMC is 2.2 minutes per ambulatory case short (89.2 minutes versus 91.4 minutes) of generating a need determination for two (2) operating rooms in the *Proposed 2020 State Medical Facilities Plan*. This 2.2 minute “gap” is quite small and will be easily closed as cases become longer and more complex.

**Adverse effect on providers and consumers without adjustment:**

The lack of an operating room need determination in Brunswick County for another year will continue to have an adverse effect on both providers and consumers if it is not adjusted. Attached to this petition are letters from surgeons who perform cases at NHBMC; the President of NHBMC, Shelbourn Stevens; and Cynthia Parrott, RN, BSN, the OR Manager at NHBMC. These letters document the real and immediate need for more OR capacity at NHBMC. As the letters from Mr. Stevens and the OR Manager describe, NHBMC has done everything physically and operationally possible to accommodate the increase in surgical cases and case times at the medical center without adding additional operating rooms. NHBMC has successfully grown its medical staff and added more surgeons. More surgical cases are being performed on an outpatient basis and the inpatient cases at NHBMC are becoming longer

and more complex. Each of these factors combines to create a need for operating rooms now to meet the needs of Brunswick County residents so that they do not have to leave Brunswick County for their care. The surgeon letters describe wait times and delays that have a real impact on patients' lives. Second, the lack of making additional operating rooms available in Brunswick County may impact the out-of-pocket costs associated with providing surgical services on a delayed basis or by requiring patients to travel out of county for surgical services. In this regard, it is important to consider financial access to surgical services. Novant Health has one of the most generous financial assistance policies in North Carolina. A copy of the current policy is attached to this petition. Last year, NHBMC provided nearly \$35.0 million in financial assistance, including free and reduced cost care. An uninsured patient with annual family income equal to or less than 300% of the current Federal Poverty Guidelines and no substantial liquid assets is eligible to have the entire bill written off. Approximately 14.1% percent of Brunswick County residents live below the poverty line. Creating more access for these residents is vitally important in promoting the goal of equitable access to care for all.

**Alternatives considered:**

Because of NHBMC's historical patient data and case times and NHBMC's current capacity, the only logical alternative is to allow for an adjusted need determination for two (2) operating rooms in Brunswick County in the *2020 State Medical Facilities Plan*. This alternative resulted in the submission of this petition for an adjusted need determination in Brunswick County.

**Evidence that the proposed adjustment would not result in unnecessary duplication of health services in the area:**

Adjusting the need determination for two (2) operating rooms in Brunswick County will not result in duplication of health services in the area, but rather would allow NHBMC the opportunity to submit a CON application to expand its already stretched surgical services. As discussed in Mr. Stevens' letter, NHBMC is aware that an outpatient surgery center, with one OR dedicated to orthopaedic surgery, will open in Brunswick County sometime in 2020. NHBMC does not believe this

new facility will materially impact NHBMC's surgical volumes because NHBMC has recruited additional surgeons, including orthopaedic surgeons, who generate more than enough volume to keep the ORs at NHBMC fully utilized.

**Evidence that the requested adjustment is consistent with the Basic Principles of Safety and Quality, Access and Value:**

The proposed adjustment is consistent with the basic principles of safety and quality, access and value. If the adjusted need determination is approved, then NHBMC has the opportunity to submit a CON application to develop the two operating rooms. This would allow NHBMC to expand its surgical services and permit NHBMC to continue offering its surgical services based on the Basic Principles of Safety and Quality, Access and Value, as presented in the following discussion:

**Promoting Quality and Safety**

The proposed adjustment promotes safety and quality. NHBMC earned top marks in spring 2019 Hospital Safety Score report" from The Leapfrog Group, an independent nonprofit organization that advocates for quality, safety and transparency in the U.S. health system. NHBMC earned an A. Hospitals were rated on five criteria:

- the use of procedures to prevent errors in treatment and follow-up,
- the frequency of patients contracting certain infections during their stays,
- the frequency of surgery-related problems,
- frequency of patient safety incidents and measures in place to minimize them, and
- the training of medical staff to maximize safety.

Since 2009 Novant Health has succeeded in a system wide quality program called "First Do No Harm: Leadership Methods in a Safe Culture" that improves patient safety using proven management techniques. The program educates leaders on basic human performance factors and relates how they affect patient safety. The program also provides leadership strategies which encouraged employees to identify, question and correct behaviors to improve patient care. NHBMC's surgical services are fully

integrated into the culture of quality and safety at NHBMC. If NHBMC were successful in the CON process for two additional operating rooms, the new operating rooms would also part of the culture of quality and safety at NHBMC.

Lack of OR capacity has the potential to negatively impact safety and quality. Hospitals must be available to serve their patients 24 x 7 x 365, regardless of the weather. Emergent cases take priority over non-emergent cases, which often causes non-emergent cases to be delayed. This creates anxiety for non-emergent patients, who are usually fasting for some time before their surgery. Staff may need to work longer hours if cases are “bumped” or delayed due to lack of available operating rooms. This not only increases costs but leads to staff burnout. Surgeons become dissatisfied when they cannot perform their cases in a timeframe that fits their schedules. All of these things combine to have a potential negative impact on safety and quality. Ensuring that all patients have timely access to surgical services is integral to promoting safety and quality. Having a sufficient number of ORs available for both emergent and non-emergent surgical cases, including scheduled outpatient cases, is central to delivering safe, high-quality care in Brunswick County.

### **Equitable Access**

The proposed adjustment promotes equitable access. NHBMC and Novant Health's eligibility criteria for charity care allows patients with annual household incomes up to 300% of the Federal Poverty Level, which is \$77,250 for a family of four in 2019, to seek Charity Care coverage from Novant Health. For example, based on the government's 2019 FPLs, a qualified family of four with annual income of \$77,250 is eligible for a full Charity Care write-off of all charges incurred at NHBMC. Additional operating rooms in Brunswick County would increase access to surgical services for medically underserved populations and would also make it less likely that Brunswick County residents would need to leave Brunswick County for surgical services.



## **Maximize Healthcare Value**

The proposed adjustment maximizes healthcare value. Presently, NHBMC could not propose to relocate two operating rooms to a non-hospital based ASF (which would mean lower prices for patients) because it simply cannot afford to lose two operating rooms at the hospital. But the addition of operating room capacity in the SMFP creates a potential opportunity that does not exist right now. As stated above, NHBMC is aware that a single specialty ASF will open in Brunswick County sometime in 2020. This new facility is a welcome addition, but it will not be able to address outpatient surgical needs in Brunswick County in a comprehensive fashion. In addition to creating the potential for a lower-cost option for patients, Novant Health maximizes healthcare value in outcomes through its Population Health Management programs. This approach encourages wellness and preventive care and managed existing conditions to slow or reverse the progression of disease, all while lowering the overall cost of care. The key to the Population Health Management approach is coordinated care, with physicians, nurses, pharmacists, dieticians, social workers referral coordinators, and others working together to give patients the customized care they want and need. Ultimately this type of care provides value-safe, more affordable care with better outcomes-and is centered on our patients' unique needs.

Novant Health has also formed a value-based strategy team launched to accelerate strategies for assuming risk and shifting further towards value-based case and payment models to demonstrate greater value for the patients we serve. The organizational aim is to generate growth and assume greater accountability for outcomes (and associated financial risk) for the patients we serve.

### **Requested Adjustment:**

Novant Health requests that the *2020 State Medical Facilities Plan* indicate a need determination for two (2) operating rooms in Brunswick County (as to be reflected in Table 6C).



Brunswick Medical Center

240 Hospital Drive NE  
Bolivia, NC 28422

July 10, 2019

Ms. Martha Frisone, Section Chief  
NC DHHS, DHSR, Healthcare Planning and Certificate of Need  
Section  
2704 Mail Service Center  
Raleigh, North Carolina 27699-2704

RE: Adjusted Need Determination for Two (2) Operating Rooms / Brunswick County

Dear Ms. Frisone,

This letter expresses my support for the petition submitted by Brunswick Community Hospital, LLC, dba Novant Health Brunswick Medical Center (“NHBMC”) to adjust the need for operating rooms in Brunswick County in the *2020 State Medical Facilities Plan* from zero (0) operating rooms to two (2) operating rooms.

I am the President of NHBMC and have worked in Brunswick County for the last 13 years. In just the last five years, NHBMC has added 12 surgeons to its medical staff in a variety of specialties including general surgery, ENT, GYN, orthopedics, etc. In addition, we have added two new specialties – spine and dental surgery. I am familiar with the operating room issues that we have been experiencing and would like to share with you how we have been accommodating our surgeons and patients. To alleviate capacity constraints in our ORs, we have implemented a number of measures since then, including:

1. Extending OR hours to 7 p.m. to accommodate additional scheduled surgeries each day,
2. Adding operating room nurses and staff in order to support these extended hours,
3. Scheduling appropriate, less complex cases to the procedure room so that more cases could be accommodated in the ORs

I am aware of the specialty ASF that will become operational in Brunswick County in 2020, but with the increase in surgeons, ambulatory surgical cases, county population growth and aging, I do not believe that its operation will impact NHBMC.

I respectfully ask that the State Health Coordinating Council consider this and publish a need determination for two (2) operating rooms in Brunswick County in the 2020 State Medical Facilities Plan.

Sincerely,

A handwritten signature in cursive script that reads 'Shelbourn Stevens'.

Shelbourn Stevens  
President



Brunswick Medical Center

240 Hospital Drive NE  
Bolivia, NC 28422

July 17, 2019

Ms. Martha Frisone, Section Chief

NC DHHS, DHSR, Healthcare Planning and Certificate of Need Section

2704 Mail Service Center

Raleigh, North Carolina 27699-2704

RE: Adjusted Need Determination for Two (2) Operating Rooms / Brunswick County

Dear Ms. Frisone,

This letter expresses my support for the petition submitted by Brunswick Community Hospital, LLC dba Novant Health Brunswick Medical Center ("NHBMC") to adjust the need for operating rooms in Brunswick County in the *2020 State Medical Facilities Plan* from zero (0) operating rooms to two (2) operating rooms.

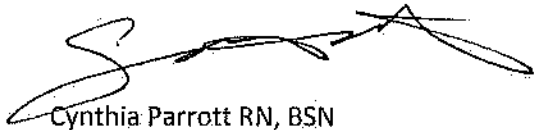
I am the OR Manager at NHBMC and have worked in Brunswick County for the last three years. NHBMC has seen its surgical cases increase in complexity through the number of ambulatory surgical cases that were previously only performed on an inpatient basis and, as such, the inpatient and ambulatory case time has remained consistent since 2016 at approximately 94 minutes per ambulatory case and 144 minutes per inpatient case. I am very familiar with the operating room issues that we have been experiencing and would like to share with you what we have been doing to accommodate our surgeons and patients. Since 2016, NHBMC has actively addressed the need for additional operating room capacity by making the following changes:

1. Operating Room utilization is continuously monitored and block changes have been made as necessary to ensure our operating rooms are utilized to capacity. These changes have limited our ability to have open block time to accommodate for emergent/urgent cases or add-on cases.
2. Additional staff positions have been added to extend the hours of operation to facilitate the needs of our patients.
3. Increased utilization of the procedure room to allow additional access to the operating room.
4. Collaboration with office administration to adjust clinic schedules and operating room block time to ensure utilization and improve access to robotic block time. However, the need for robotic block time has increased with the addition of surgeons trained in Robotic Surgery in Brunswick County.

These changes have allowed NHBMC to safely perform the current volume of surgical cases but does not address the continued need for additional operating rooms at NHBMC.

I respectfully ask that the State Health Coordinating Council consider this and publish a need determination for two (2) operating rooms in Brunswick County in the 2020 State Medical Facilities Plan.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cynthia Parrott', with a large, stylized flourish at the end.

Cynthia Parrott RN, BSN

OR Manager



Orthopedics & Spine  
6 Doctors Circle, Ste 5  
Supply, NC 28462

July 10, 2019

Ms. Martha Frisone, Section Chief  
NC DHHS, DHR, Healthcare Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, North Carolina 27699-2704

RE: Adjusted Need Determination for Two (2) Operating Rooms / Brunswick County

Dear Ms. Frisone,

This letter expresses my support for the petition submitted by Brunswick Community Hospital, LLC dba Novant Health Brunswick Medical Center (“NHBMC”) to adjust the need for operating rooms in Brunswick County in the *2020 State Medical Facilities Plan* from zero (0) operating rooms to two (2) operating rooms.

I am joining as a practicing surgeon who will regularly use the ORs at NHBMC. NHBMC has been in need for additional operating rooms for several years and only because of the use of “adjusted” case times in the standard methodology has a need determination for additional operating rooms in Brunswick County been suppressed.

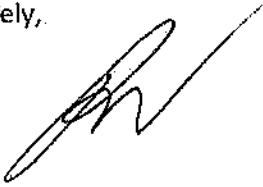
NHBMC and Brunswick County need these additional operating rooms to be available in the *2020 State Medical Facilities Plan* because of the following reasons that I and my patients have personally experienced:

1. As a new physician at Brunswick Medical Center I am already seeing the need for additional OR availability. I plan to grow my new practice and see a glaring bottle neck effect due to limited block time availability. My expectations are to have 2 OR full day block time and add 6-12 cases a week but at current availability I do not see this potential without adding new operating rooms.

2. Part of my expectations of increasing my surgical volume and practice is by using an extra OR to flip rooms so I can serve more patients efficiently and decrease wait time on future patient cases. The ability to increase workload and efficiency with flipping rooms is well documented.

I respectfully ask that the State Health Coordinating Council consider this and publish a need determination for 2 ORs in Brunswick County in the 2020 State Medical Facilities Plan.

Sincerely,

A handwritten signature in black ink, appearing to read 'RV', written in a cursive style.

Ricardo Valle, MD





Orthopedics & Spine  
6 Doctors Circle, Ste 5  
Supply, NC 28462

July 11, 2019

Ms. Martha Frisone, Section Chief  
NC DHHS, DHR, Healthcare Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, North Carolina 27699-2704

RE: Adjusted Need Determination for Two (2) Operating Rooms / Brunswick County

Dear Ms. Frisone,

This letter expresses my support for the petition submitted by Brunswick Community Hospital, LLC dba Novant Health Brunswick Medical Center (“NHBMC”) to adjust the need for operating rooms in Brunswick County in the *2020 State Medical Facilities Plan* from zero (0) operating rooms to two (2) operating rooms.

I am a practicing surgeon who regularly uses the ORs at NHBMC. NHBMC has been in need of additional operating rooms for several years and only because of the use of “adjusted” case times in the standard methodology has a need determination for additional operating rooms in Brunswick County been suppressed.

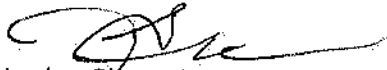
NHBMC and Brunswick County need these additional operating rooms to be available in the *2020 State Medical Facilities Plan* because of the following reasons that I and my patients have personally experienced:

As a new physician at Novant Health Brunswick Medical Center, I am already seeing the need for additional OR availability. I plan to grow my new practice and see a glaring bottle neck effect due to limited block time availability. My expectations are to have 2 OR full day blocks and add 4-8 cases per week. At current availability, I do not see this

potential without adding new operating rooms. This will cause delays which will adversely affect patient care and hamper our ability to offer timely services to our community.

I respectfully ask that the State Health Coordinating Council consider this and publish a need determination for 2 ORs in Brunswick County in the 2020 State Medical Facilities Plan.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jordan Glaser', with a long horizontal flourish extending to the right.

Jordan Glaser, MD



July 17, 2019

Ms. Martha Frisone, Section Chief  
NC DHHS, DHSR, Healthcare Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, North Carolina 27699-2704

RE: Adjusted Need Determination for Two (2) Operating Rooms / Brunswick County

Dear Ms. Frisone,

This letter expresses my support for the petition submitted by Brunswick Community Hospital, LLC dba Novant Health Brunswick Medical Center ("NHBMC") to adjust the need for operating rooms in Brunswick County in the *2020 State Medical Facilities Plan* from zero (0) operating rooms to two (2) operating rooms.

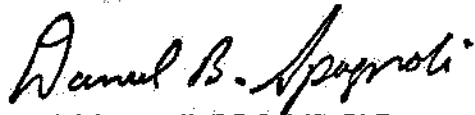
I am a practicing surgeon who regularly uses the ORs at NHBMC. In 2018, I performed 3 cases in the ORs at NHBMC, and expect to perform a similar number of cases in the ORs at NHBMC in 2019. NHBMC has been in need for additional operating rooms for several years and only because of the use of "adjusted" case times in the standard methodology has a need determination for additional operating rooms in Brunswick County been suppressed.

NHBMC and Brunswick County need these additional operating rooms to be available in the *2020 State Medical Facilities Plan* because of the following reasons that I and my patients have personally experienced:

1. Oral & Maxillofacial Surgery services are growing in this area as our practice grows as well.
2. We have had difficult time finding available time at the hospital due to limited OR time.

I respectfully ask that the State Health Coordinating Council consider this and publish a need determination for 2 ORs in Brunswick County in the *2020 State Medical Facilities Plan*.

Sincerely,



Daniel Spagnoli, DDS, MS, PhD

July 12, 2019

Ms. Martha Frisone, Section Chief  
NC DHHS, DHSR, Healthcare Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, North Carolina 27699-2704

RE: Adjusted Need Determination for Two (2) Operating Rooms / Brunswick County

Dear Ms. Frisone,

This letter expresses my support for the petition submitted by Brunswick Community Hospital, LLC dba Novant Health Brunswick Medical Center ("NHBMC") to adjust the need for operating rooms in Brunswick County in the *2020 State Medical Facilities Plan* from zero (0) operating rooms to two (2) operating rooms.

I am a practicing surgeon who regularly uses the ORs at NHBMC. In 2018, I performed 124 cases in the ORs at NHBMC, and expect to perform a similar number of cases in the ORs at NHBMC in 2019. NHBMC has been in need for additional operating rooms for several years and only because of the use of "adjusted" case times in the standard methodology has a need determination for additional operating rooms in Brunswick County been suppressed.

NHBMC and Brunswick County need these additional operating rooms to be available in the *2020 State Medical Facilities Plan* because of the following reasons that I and my patients have personally experienced:

1. There is a concerning delay in scheduling urgent cases due to lack of block time and operating rooms available.
2. Due to the delay, I have taken my patients to another facility out of state to South Carolina. This forces patients to inconveniently drive nearly 1 1/2 hours away. This certainly removes revenue from the county, state and hospital.
3. My block time is diminished since my partner who has moved closer to the hospital now uses my time to perform surgeries. This delays my patient's care due to the lack of Operating Time/Space.
4. We are actively recruiting another Otolaryngologist due to the growth in our practice and population growth in Brunswick County. We are at a disadvantage since there is no block time to offer this new candidate despite the massive growth in Brunswick County.

I respectfully ask that the State Health Coordinating Council consider this and publish a need determination for 2 ORs in Brunswick County in the *2020 State Medical Facilities Plan*.

Sincerely,



Jeffrey Coury, DO

July 12, 2019

Ms. Martha Frisone, Section Chief  
NC DHHS, DHR, Healthcare Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, North Carolina 27699-2704

RE: Adjusted Need Determination for Two (2) Operating Rooms / Brunswick County

Dear Ms. Frisone,

This letter expresses my support for the petition submitted by Brunswick Community Hospital, LLC dba Novant Health Brunswick Medical Center ("NHBMC") to adjust the need for operating rooms in Brunswick County in the *2020 State Medical Facilities Plan* from zero (0) operating rooms to two (2) operating rooms.

I am a practicing surgeon who regularly uses the ORs at NHBMC. In 2018, I performed 55 cases in the ORs at NHBMC, and expect to perform a similar number of cases in the ORs at NHBMC in 2019. NHBMC has been in need for additional operating rooms for several years and only because of the use of "adjusted" case times in the standard methodology has a need determination for additional operating rooms in Brunswick County been suppressed.

NHBMC and Brunswick County need these additional operating rooms to be available in the *2020 State Medical Facilities Plan* because of the following reasons that I and my patients have personally experienced:

1. My request for block time in 2018 was denied as the operating room utilization exceeded target.
2. Scheduling cases at NHBMC is challenging related to the full schedule and relying solely on open block time.
3. My case volume will be difficult to maintain with additional surgeons joining Novant Health as a direct result of insufficient operating room availability.

I respectfully ask that the State Health Coordinating Council consider this and publish a need determination for 2 ORs in Brunswick County in the *2020 State Medical Facilities Plan*.

Sincerely,



Edward Ricciardelli, MD

July 10, 2019

Ms. Martha Frisone, Section Chief  
NC DHHS, DHSR, Healthcare Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, North Carolina 27699-2704

RE: Adjusted Need Determination for Two (2) Operating Rooms / Brunswick County

Dear Ms. Frisone,

This letter expresses my support for the petition submitted by Brunswick Community Hospital, LLC dba Novant Health Brunswick Medical Center ("NHBMC") to adjust the need for operating rooms in Brunswick County in the *2020 State Medical Facilities Plan* from zero (0) operating rooms to two (2) operating rooms.

I am a practicing surgeon who has recently relocated my neurosurgical practice from Charlotte to Brunswick County. I have been attempting to regularly use the ORs at NHBMC. Due to a shortage of available OR time, I have been unable to obtain dedicated surgical time. It is my understanding that NHBMC has been in need for additional operating rooms for several years and only because of the use of "adjusted" case times in the standard methodology has a need determination for additional operating rooms in Brunswick County been suppressed.

NHBMC and Brunswick County need these additional operating rooms to be available in the *2020 State Medical Facilities Plan* because of the following reasons that I and my patients have personally experienced:

1. I am consistently unable to obtain OR time for my surgical cases
2. I have not been able to obtain a dedicated, recurring OR time slot for my surgical cases

I respectfully ask that the State Health Coordinating Council consider this and publish a need determination for 2 ORs in Brunswick County in the *2020 State Medical Facilities Plan*.

Sincerely,



Kevin S. Cahill MD, PhD, MPH



July 12, 2019

Ms. Martha Frisone, Section Chief  
NC DHHS, DHSR, Healthcare Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, North Carolina 27699-2704

**Surgical Associates**

584 Hospital Drive, Suite A  
Bolivia, NC 28422  
75 Emerson Bay Rd. SW, Suite 102  
Calabash, NC 28467  
NovantHealth.org

RE: Adjusted Need Determination for Two (2) Operating Rooms /  
Brunswick County

Dear Ms. Frisone,

This letter expresses my support for the petition submitted by Brunswick Community Hospital, LLC dba Novant Health Brunswick Medical Center ("NHBMC") to adjust the need for operating rooms in Brunswick County in the *2020 State Medical Facilities Plan* from zero (0) operating rooms to two (2) operating rooms.

I am a practicing surgeon who regularly uses the ORs at NHBMC. In 2018, I performed 355 cases in the ORs at NHBMC, and expect to perform a similar number of cases in the ORs at NHBMC in 2019. NHBMC has been in need for additional operating rooms for several years and only because of the use of "adjusted" case times in the standard methodology has a need determination for additional operating rooms in Brunswick County been suppressed.

NHBMC and Brunswick County need these additional operating rooms to be available in the *2020 State Medical Facilities Plan* because of the following reasons that I and my patients have personally experienced:

1. Due to limited OR availability my patients have had care delayed. On several occasions it has been necessary to travel outside of the county for care to be provided sooner than could be arranged at our facility.
2. We have limited availability for robotic surgery due to inadequate room availability. This ultimately limits our ability to offer patients a less invasive approach for certain procedures.
3. As the level of acuity increases with regard to the patients we care for in our region, it is difficult to continue the elective volume we provide while at the same time making sure we have OR availability for emergency cases.

I respectfully ask that the State Health Coordinating Council consider this and publish a need determination for 2 ORs in Brunswick County in the *2020 State Medical Facilities Plan*.

Sincerely,



J. Andrew Smith, MD

Max Benenati, DO  
A. Richard Desandre, MD  
Richard R. Scallion, MD  
Mark Tillotson, MD



**Surgical Associates**

584 Hospital Drive, Suite A  
Bolivia, NC 28422

75 Emerson Bay Rd. SW, Suite 102  
Cajabash, NC 28467

NovantHealth.org

July 12, 2019

Ms. Martha Frisone, Section Chief  
NC DHHS, DHSR, Healthcare Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, North Carolina 27699-2704

RE: Adjusted Need Determination for Two (2) Operating Rooms /  
Brunswick County

Dear Ms. Frisone,

This letter expresses my support for the petition submitted by Brunswick Community Hospital, LLC dba Novant Health Brunswick Medical Center ("NHBMC") to adjust the need for operating rooms in Brunswick County in the *2020 State Medical Facilities Plan* from zero (0) operating rooms to two (2) operating rooms.

I am a practicing surgeon who regularly uses the ORs at NHBMC. In 2018, I performed 437 cases in the ORs at NHBMC, and expect to perform a similar number of cases in the ORs at NHBMC in 2019. NHBMC has been in need for additional operating rooms for several years and only because of the use of "adjusted" case times in the standard methodology has a need determination for additional operating rooms in Brunswick County been suppressed.

NHBMC and Brunswick County need these additional operating rooms to be available in the *2020 State Medical Facilities Plan* because of the following reasons that I and my patients have personally experienced:

1. The current ORs in the county are booked almost every day with elective cases. This creates a problem when adding on urgent cases. Patients with needs, including cholecystitis and appendicitis, have to bump the already scheduled patients or wait till the end of the day, to the detriment of the patient.
2. We are trying to grow and expand surgical services in the county so patients do not have to drive long distances for specialty services. Limited OR space prevents us from doing so, requiring patients to seek care elsewhere.

I respectfully ask that the State Health Coordinating Council consider this and publish a need determination for 2 ORs in Brunswick County in the *2020 State Medical Facilities Plan*.

Sincerely,

Richard Scallion, MD

Max Benenati, DO  
A. Richard Desandre, MD  
Richard R. Scallion, MD  
Mark Tillotson, MD



July 12, 2019

Ms. Martha Frisone, Section Chief  
NC DHHS, DHSR, Healthcare Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, North Carolina 27699-2704

**Surgical Associates**

584 Hospital Drive, Suite A  
Bolivia, NC 28422  
75 Emerson Bay Rd. SW, Suite 102  
Calabash, NC 28467  
NovantHealth.org

RE: Adjusted Need Determination for Two (2) Operating Rooms /  
Brunswick County

Dear Ms. Frisone,

This letter expresses my support for the petition submitted by Brunswick Community Hospital, LLC dba Novant Health Brunswick Medical Center ("NHBMC") to adjust the need for operating rooms in Brunswick County in the *2020 State Medical Facilities Plan* from zero (0) operating rooms to two (2) operating rooms.

I am a practicing surgeon who regularly uses the ORs at NHBMC. In 2018, I performed 211 cases in the ORs at NHBMC, and expect to perform a similar number of cases in the ORs at NHBMC in 2019. NHBMC has been in need for additional operating rooms for several years and only because of the use of "adjusted" case times in the standard methodology has a need determination for additional operating rooms in Brunswick County been suppressed.

NHBMC and Brunswick County need these additional operating rooms to be available in the *2020 State Medical Facilities Plan* because of the following reasons that I and my patients have personally experienced:

1. Due to limited OR availability my patients have had care delayed several months. Patients have chosen to seek care outside of the county where they can be scheduled in the OR faster than we are capable of doing.
2. As the level of acuity increases with regard to the patients we care for in our region, it is difficult to continue the elective volume we provide while at the same time making sure we have OR availability for emergency cases.
3. Elective cases are frequently being rescheduled to accommodate more urgent needs, requiring OR time, decreasing patient satisfaction. This would be resolved with additional OR space.

I respectfully ask that the State Health Coordinating Council consider this and publish a need determination for 2 ORs in Brunswick County in the *2020 State Medical Facilities Plan*.

Sincerely,

  
Adolfo R. DeSandre, MD

Max Benenati, DO  
A. Richard Desandre, MD  
Richard R. Scallion, MD  
Mark Tillotson, MD



**Surgical Associates**

584 Hospital Drive, Suite A  
Bolivia, NC 28422

75 Emerson Bay Rd. SW, Suite 102  
Calabash, NC 28467

NovantHealth.org

July 12, 2019

Ms. Martha Frisone, Section Chief  
NC DHHS, DHSR, Healthcare Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, North Carolina 27699-2704

RE: Adjusted Need Determination for Two (2) Operating Rooms /  
Brunswick County

Dear Ms. Frisone,

This letter expresses my support for the petition submitted by Brunswick Community Hospital, LLC dba Novant Health Brunswick Medical Center ("NHBMC") to adjust the need for operating rooms in Brunswick County in the *2020 State Medical Facilities Plan* from zero (0) operating rooms to two (2) operating rooms.

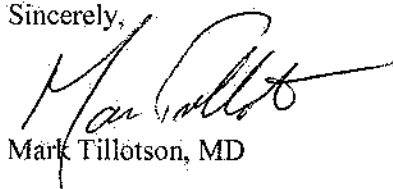
I am a practicing surgeon who regularly uses the ORs at NHBMC. In 2018, I performed 324 cases in the ORs at NHBMC, and expect to perform a similar number of cases in the ORs at NHBMC in 2019. NHBMC has been in need for additional operating rooms for several years and only because of the use of "adjusted" case times in the standard methodology has a need determination for additional operating rooms in Brunswick County been suppressed.

NHBMC and Brunswick County need these additional operating rooms to be available in the *2020 State Medical Facilities Plan* because of the following reasons that I and my patients have personally experienced:

1. Unable to schedule emergency cases in a timely fashion; jeopardizing recovery. Delays can also lead to the need for more complicated procedures.
2. Unable to expand surgical services for Brunswick County. For example, advanced vascular and robotic cases that require additional time to perform cannot be addressed because of the limited operative time.
3. Most important, we are not allowing the residents of Brunswick County to have timely access for elective cases. For example, nearly 50% of gall bladder surgery and 40% of hernia surgery, all scheduled electively is done out of the county. It is a hardship for families and patients and an unnecessary burden for facilities outside the county with their limited resources.

I respectfully ask that the State Health Coordinating Council consider this and publish a need determination for 2 ORs in Brunswick County in the *2020 State Medical Facilities Plan*.

Sincerely,



Mark Tillotson, MD

Max Benenati, DO  
A. Richard Desandre, MD  
Richard R. Scallion, MD  
Mark Tillotson, MD





July 12, 2019

Urology Partners

Ms. Martha Frisone, Section Chief  
NC DHHS, DHSR, Healthcare Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, North Carolina 27699-2704

584 Hospital Drive, Suite D  
Bolivia, NC 28422

[nhurologypartners.org](http://nhurologypartners.org)

RE: Adjusted Need Determination for Two (2) Operating Rooms /  
Brunswick County

Dear Ms. Frisone,

This letter expresses my support for the petition submitted by Brunswick Community Hospital, LLC dba Novant Health Brunswick Medical Center ("NHBMC") to adjust the need for operating rooms in Brunswick County in the *2020 State Medical Facilities Plan* from zero (0) operating rooms to two (2) operating rooms.

I am a practicing surgeon who regularly uses the ORs at NHBMC. In 2018, I performed 254 cases in the ORs at NHBMC, and expect to perform a similar number of cases in the ORs at NHBMC in 2019. NHBMC has been in need for additional operating rooms for several years and only because of the use of "adjusted" case times in the standard methodology has a need determination for additional operating rooms in Brunswick County been suppressed.

NHBMC and Brunswick County need these additional operating rooms to be available in the *2020 State Medical Facilities Plan* because of the following reasons that I and my patients have personally experienced:

1. Due to limited OR availability my patients have had care delayed several months. Patients have chosen to seek care outside of the county where they can be scheduled in the OR faster than we are capable of doing.
2. Elective cases are increasingly pushed farther out to accommodate more urgent needs, requiring OR time. Patients, unsatisfied with the increasing delays, look outside of the county for more readily available ORs.
3. Add on cases are pushed into evening/night time hours because there are no ORs available during regular business hours. Resources are stretched as OR schedules extend into off hours; completely preventable with the addition of ORs.

I respectfully ask that the State Health Coordinating Council consider this and publish a need determination for 2 ORs in Brunswick County in the *2020 State Medical Facilities Plan*.

Sincerely,

A handwritten signature in black ink, appearing to read 'Steven Robbins'.

Steven Robbins, MD

July 11, 2019



Ms. Martha Frisone, Section Chief  
NC DHHS, DHSR, Healthcare Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, North Carolina 27699-2704

OB/GYN

584 Hospital Drive, Suite B  
Bolivia, NC 28422

[novanthealthobgyn.org](http://novanthealthobgyn.org)

RE: Adjusted Need Determination for Two (2) Operating Rooms / Brunswick County

Dear Ms. Frisone,

This letter expresses my support for the petition submitted by Brunswick Community Hospital, LLC dba Novant Health Brunswick Medical Center ("NHBMC") to adjust the need for operating rooms in Brunswick County in the *2020 State Medical Facilities Plan* from zero (0) operating rooms to two (2) operating rooms.

I am a practicing surgeon who regularly uses the ORs at NHBMC. In 2018, I performed 161 cases in the ORs at NHBMC, and expect to perform a similar number of cases in the ORs at NHBMC in 2019. NHBMC has been in need for additional operating rooms for several years and only because of the use of "adjusted" case times in the standard methodology has a need determination for additional operating rooms in Brunswick County been suppressed.

NHBMC and Brunswick County need these additional operating rooms to be available in the *2020 State Medical Facilities Plan* because of the following reasons that I and my patients have personally experienced:

1. Improved ability to schedule patients in a timely manner, which also aligns with the needs of the patient and their schedules.
2. Improved ability to get short term/add-on OR cases scheduled. This can create great stress trying to get patients cared for in a timely manner.
3. With community growth, we would like to be able to ensure that patients have the needed resources available throughout the community in which they reside. It is important to offer the patients the ability to get the needed care close to home.

I respectfully ask that the State Health Coordinating Council consider this and publish a need determination for 2 ORs in Brunswick County in the *2020 State Medical Facilities Plan*.

Sincerely,

A handwritten signature in cursive script that reads "Richard Lee Toler, DO".

Richard Lee Toler, DO

July 9, 2019



Ms. Martha Frisone, Section Chief  
NC DHHS, DHSR, Healthcare Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, North Carolina 27699-2704

OB/GYN

584 Hospital Drive, Suite 8  
Bolivia, NC 28422

[novanthealthobgyn.org](http://novanthealthobgyn.org)

RE: Adjusted Need Determination for Two (2) Operating Rooms / Brunswick County

Dear Ms. Frisone,

This letter expresses my support for the petition submitted by Brunswick Community Hospital, LLC dba Novant Health Brunswick Medical Center ("NHBMC") to adjust the need for operating rooms in Brunswick County in the *2020 State Medical Facilities Plan* from zero (0) operating rooms to two (2) operating rooms.

I am a practicing surgeon who regularly uses the ORs at NHBMC. In 2018, I performed 113 cases in the ORs at NHBMC, and expect to perform a similar number of cases in the ORs at NHBMC in 2019. NHBMC has been in need for additional operating rooms for several years and only because of the use of "adjusted" case times in the standard methodology has a need determination for additional operating rooms in Brunswick County been suppressed.

NHBMC and Brunswick County need these additional operating rooms to be available in the *2020 State Medical Facilities Plan* because of the following reasons that I and my patients have personally experienced:

1. Due to robotic case volume need and the limited ability to schedule the cases, I experience delays in getting this type of patient care completed.
2. OR block utilization is high resulting in delays in scheduling routine surgeries in a timely manner. I am currently booking patients into October to be scheduled to receive their surgical needs.
3. Emergent situations are unpredictable and the resources of having additional ORs could assist in the ability to provide this high quality and essential care to our patient population.

I respectfully ask that the State Health Coordinating Council consider this and publish a need determination for 2 ORs in Brunswick County in the *2020 State Medical Facilities Plan*.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nicholas Bodenheimer'.

Nicholas Bodenheimer, DO

July 10, 2019



Ms. Martha Frisone, Section Chief  
NC DHHS, DHSR, Healthcare Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, North Carolina 27699-2704

OB/GYN

584 Hospital Drive, Suite B  
Bolivia, NC 28422

[novanthealthobgyn.org](http://novanthealthobgyn.org)

RE: Adjusted Need Determination for Two (2) Operating Rooms / Brunswick County

Dear Ms. Frisone,

This letter expresses my support for the petition submitted by Brunswick Community Hospital, LLC dba Novant Health Brunswick Medical Center ("NHBMC") to adjust the need for operating rooms in Brunswick County in the *2020 State Medical Facilities Plan* from zero (0) operating rooms to two (2) operating rooms.

I am a practicing surgeon who regularly uses the ORs at NHBMC. In 2018, I performed 115 cases in the ORs at NHBMC, and expect to perform a similar number of cases in the ORs at NHBMC in 2019. NHBMC has been in need for additional operating rooms for several years and only because of the use of "adjusted" case times in the standard methodology has a need determination for additional operating rooms in Brunswick County been suppressed.

NHBMC and Brunswick County need these additional operating rooms to be available in the *2020 State Medical Facilities Plan* because of the following reasons that I and my patients have personally experienced:

1. Currently I have a delay with scheduling new surgical cases. I am currently booking cases to be done 3 months from now due to need for additional block time.
2. I have experienced difficulty scheduling Robotic cases due to the limited availability. I can only perform cases utilizing the daVinci robot twice per month.
3. In emergency situations, the ability to add a case on is often delayed by hours with the current OR volumes and block utilization.

I respectfully ask that the State Health Coordinating Council consider this and publish a need determination for 2 ORs in Brunswick County in the *2020 State Medical Facilities Plan*.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Thompson'.

Richard Thompson, DO

T 910-721-4050  
F 910-721-4051



**Urology Partners**

584 Hospital Drive, Suite D  
Bolivia, NC 28422

[nhurologypartners.org](http://nhurologypartners.org)

July 12, 2019

Ms. Martha Frisone, Section Chief  
NC DHHS, DHSR, Healthcare Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, North Carolina 27699-2704

RE: Adjusted Need Determination for Two (2) Operating Rooms /  
Brunswick County

Dear Ms. Frisone,

This letter expresses my support for the petition submitted by Brunswick Community Hospital, LLC dba Novant Health Brunswick Medical Center ("NHBMC") to adjust the need for operating rooms in Brunswick County in the *2020 State Medical Facilities Plan* from zero (0) operating rooms to two (2) operating rooms.

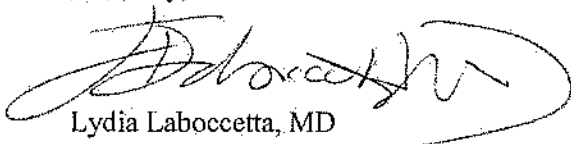
I am a practicing surgeon who regularly uses the ORs at NHBMC. In 2018, I performed 295 cases in the ORs at NHBMC, and expect to perform a similar number of cases in the ORs at NHBMC in 2019. NHBMC has been in need of additional operating rooms for several years and only because of the use of "adjusted" case times in the standard methodology has a need determination for additional operating rooms in Brunswick County been suppressed.

NHBMC and Brunswick County need these additional operating rooms to be available in the *2020 State Medical Facilities Plan* because of the following reasons that I and my patients have personally experienced:

1. Delayed treatment for painful and obstructing kidney stones by days, even weeks limiting patients' ability to work in our community while they wait for care.
2. Delayed treatment of kidney and prostate cancers due to limitations of scheduling availability.
3. Excessively long surgery days in order to accommodate urgent and emergent cases which could have been managed earlier in the day if there was more room availability.

I respectfully ask that the State Health Coordinating Council consider this and publish a need determination for 2 ORs in Brunswick County in the *2020 State Medical Facilities Plan*.

Sincerely,



Lydia Labocetta, MD