

August 7, 2019

Lyndon Jordan, III, MD (Chair), Technology and Equipment Committee
North Carolina State Health Coordinating Council
c/o NC Division of Health Service Regulation
Healthcare Planning and Certificate of Need Section
2704 Mail Service Center
Raleigh, NC 27699-2704
DHSR.SMFP.Petitions-Comments@dhhs.nc.gov

Re: Support for Petition for Adjusted Need Determination for Fixed Cardiac Catheterization
Equipment in Henderson County

Dear Dr. Jordan and members of the Committee:

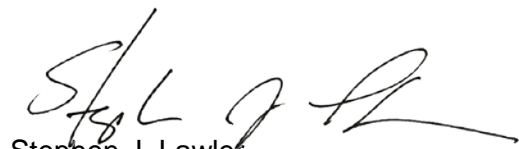
NCHA represents 130 hospitals and health systems in North Carolina, and we thank you for the opportunity to comment on the Petition received by the State Health Coordinating Council from Margaret R. Pardee Memorial Hospital (Pardee UNC Health Care). Pardee UNC has submitted a written petition for a unit of fixed cardiac catheterization equipment in Henderson County, requesting an adjustment to the need determination in the North Carolina Proposed State Medical Facilities Plan.

Pardee UNC notes in its petition that it has been providing cardiac catheterization services since 2002 in a leased and CON "grandfathered" unit that was previously mobile. However, for various reasons, including plans to expand its ST-Elevation Myocardial Infarction (STEMI) program to full time basis, they are seeking the opportunity for ownership of their program's equipment.

Pardee UNC serves a growing and aging population in Henderson County, which will have greater need for STEMI services, and is anticipating access concerns related to planned and potentially lengthy road construction projects that include Interstate 26. The increased cost efficiencies and lowered risk to the program when equipment is owned provides further rationale for approving their petition, and NCHA supports Pardee UNC's request for an adjustment to the need determination.

We thank you for your consideration of our comments and ask that you please contact Mike Vicario (mvicario@ncha.org) or me if you have questions or concerns.

Sincerely,



Stephen J. Lawler
President
North Carolina Healthcare Association

Cc: Christopher Ullrich M.D., SHCC Chair

