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HEALTH PAVILION NORTH
HIGHSMITH-RAINEY
SPECIALTY HOSPITAL
HOKE HOSPITAL

March 18, 2020

Christopher G. Ullrich, M.D.
Chairman, North Carolina State Health Coordinating Council
c/o Health Planning and Certificate of Need Section
Division of Health Service Regulation
2714 Mail Service Center
Raleigh, NC 27699-2714

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Subject: Petition response regarding Vallegate Dental Surgery Center

Dear Dr. Ullrich:

Cape Fear Valley Health System (CFVHS) has several questions regarding the Petition submitted by Vallegate Dental Surgery Center to expand services to include ENT procedures.

First: Safety

1. Who provides anesthesia at Vallegate? If CRNAs, who is supervising the CRNAs? A Board-Certified Anesthesiologists? Is there a CRNA present throughout the entire case when a child is anesthetized?

Second: Facility Construction Standards

2. Were the dental demonstration ASCs built to conform to the exact same standards as a multi-specialty ASC, or were they built more to the standards for GI ASC facilities, which do not have the same sterile requirements, etc. Construction of facility to ASC standards or more like GI ASC standards? DHSR Construction could answer this question.

Third: Physician Support

3. The Petition did not include any letters of support from area ENTs

Fourth: Position of North Carolina Healthcare Association (NCHA) and other facilities

4. What is the position of the NCHA and other existing multispecialty ambulatory surgery centers? There are three Vallegate locations. What do facilities in Charlotte and Winston Salem think about this?

Fifth: Duplication of Services in the Market

5. Fayetteville Ambulatory Surgical Center, the existing freestanding ASC in Fayetteville, has 11 operating rooms. The 2020 ASC LRA shows a surplus of 6 ORs at his facility.
 - i. Total cases – 8,435 surgical procedures
 - ii. Otolaryngology – 1,274 surgical procedures
 - iii. No dental procedures

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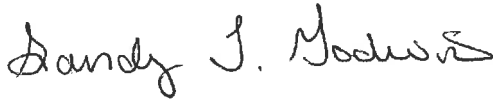
Christopher G. Ullrich, MD
March 18, 2020, Page Two

Sixth: Transfer agreement

6. To the best of our knowledge, Valleygate Dental Surgery Center does not have a transfer agreement. Is this a requirement?

CFVHS believes the Acute Care Committee and the SHCC should consider all issues prior to making any adjustments or changes to the dental demonstration project.

Sincerely,



Sandy T. Godwin
Corporate Director of Financial, Strategic Planning & Analytics
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