

March 18, 2020

Sandra Greene, PhD, Committee Chair
State Health Coordinating Committee

Martha Frisone, Chief
Amy Craddock, PhD, Assistant Chief
Healthcare Planning and Certificate of Need Section
Division of Health Service Regulation
2714 Mail Service Center
Raleigh, NC 27699-2714

RE: Comments on Valleygate Dental Surgery Holdings, LLC's Petition to include other medical surgeons in procedures at Dental Single Specialty Ambulatory Surgery Center Demonstration Projects

Dear Dr. Greene, Ms. Frisone, and Dr. Craddock,

On behalf of Valleygate Dental Surgery Holdings LLC, thank you for the opportunity to comment on the above referenced petition. During your review of the petition, I trust that you will consider these comments thoughtfully.

During our presentation at the State Health Coordinating Council ("SHCC") public hearing on March 4, 2020, several topics of discussion arose regarding portions of our proposed petition. We would like to offer clarification here.

1. We have given some additional thought to the language within the petition, and we would like to limit our request to ENTs only. This is the only specialty that we have encountered to date that could collaborate in a manner that is consistent with the dental operational techniques and time requirements.
2. We would offer that the ENT physicians be given limited or temporary privileges only. They would not receive "block time." Admittance would be part of an existing dental case only.
3. The origination source of referrals involving ENTs would be the dental or oral surgery practice. The ENT would not send a referral directly to the ASC.

All patients affected are children. Because the referrals originate from dental practices, our ASCs have patient navigators assigned to every patient. Patient navigators arrange for a pediatrician or general physician to perform a History and Physical ("H&P") to determine the patient's readiness for surgery under anesthesia. Sometimes, the pediatrician or general physician will

diagnose a condition, for example tonsils, that would require ENT surgery. Typically, the pediatrician or general physician would notify us and make the referral to ENT. The navigator then helps the parent/patient set up and attends the ENT appointment. The navigator receives information on any necessary ENT treatment that is required.

Periodically, when reviewing the dental case for surgery, the anesthesiologist will indicate that an ENT referral is necessary prior to procedure. The same rules apply. The navigator then arranges the ENT appointment prior to surgery. This system allows for a more streamlined coordination of care from physicians and specialists in the best interest of the patient. Today, only the dental repair is scheduled at the dental surgery center. All ENT repair is completed in other locations.

We propose that the team – dentist / oral surgeon, ENT, and anesthesiologist – assess the case and determine if the patient condition is appropriate to manage as a single case. If appropriate, the patient would be scheduled in the associated dentist's operating room schedule block at the dental surgery center as a single dental case.

4. On the matter of authority, we have considered that the Agency may find it more practical to make a Declaratory Ruling that the proposed arrangement is in material compliance with the intent of Criterion 3 of Table 6D in the 2016 State Medical Facilities Plan. That criterion reads:

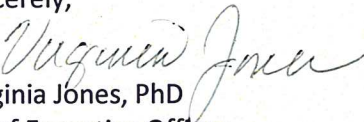
The facility shall provide only dental and oral surgical procedures requiring sedation.

If the Committee agrees, the Committee could make such a recommendation to the Agency and there would be no need to amend the State Medical Facilities Plan. The Agency could determine the Declaratory Ruling on a case-by-case basis for each approved demonstration facility.

Regardless, we do not see any reason to require a new CON application to permit the dental demonstration ambulatory surgical facilities to offer this service.

Thank you for your time and consideration.

Sincerely,


Virginia Jones, PhD
Chief Executive Officer