



Atrium Health

Comments on Novant Health Mint Hill Medical Center Petition to add Patient Days to Table 5A in the 2022 State Medical Facilities Plan

COMMENTER:

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The Charlotte-Mecklenburg Hospital Authority d/b/a Atrium Health (Atrium) opposes the petition filed by Novant Health Mint Hill Medical Center (Mint Hill) for an adjustment to the need determination for acute care beds in Mecklenburg County in the 2022 State Medical Facilities Plan (SMFP). The petition includes incomplete analysis and lacks a projection demonstrating the impact of the requested change on the acute care bed need for Mecklenburg County. The petitioner also ignores the potential for duplication of patient days by treating Mint Hill differently than other facilities in the adjusted methodology.

The State Health Coordinating Council (SHCC) reviewed options to adjust the acute care methodology to account for the impact of the COVID-19 pandemic on acute care bed utilization. The standard methodology using FFY 2020 days resulted in no acute care bed need anywhere in the state. The SHCC decided to use a three-year average of patient days for each facility in place of actual FFY 2020 days which resulted in acute care bed need determinations in six counties and a statewide total of 314 beds. In Mecklenburg County the need was for 67 beds.

The petitioner did not include any information in the petition regarding the impact their request will have on the acute care bed need in Mecklenburg County. Mint Hill proposed to use the acute care days reported on the annual license renewal application to recalculate the bed need. However, the methodology uses data reported to Hospital Industry Data Institute (HIDI).

Atrium developed a duplicate Table 5A from the Proposed 2022 SMFP to determine the impact of the requested change using the 7,973 acute care patient days Mint Hill reported to HIDI. The table below shows the significant impact of adding the Mint Hill days into the current bed need calculation. The 7,973 days amount to a 1.2 percent increase in patient

days but result in a bed need increase of 56.7 percent. The projected bed need for Mecklenburg County increases to 105 beds. However, the petition did not address the county-wide growth rate used in the methodology. If the additional days are also used to recalculate the growth rate the projected bed need increases to 142 beds or a 111.9 percent increase.

Scenario	Mecklenburg County Acute Care Bed Need
FFY 2020 HIDI	0
3-year Average COVID Adjustment	67
3-year Average + Mint Hill (same growth rate)	105
3-year Average + Mint Hill (recalculated growth rate)	142

The petition also ignores the potential for double counting of patients that were served at Mint Hill that would have been treated at Novant facilities or other facilities in the past. The three-year average patient day calculation likely includes patients who historically have sought care at other facilities in the county but in FFY 2020 chose to receive their care at Mint Hill. It is not possible to determine the number of patient days this issue could involve but treating Mint Hill differently than other facilities creates the possibility of duplication resulting in an overestimate of bed need.

In conclusion, Atrium supports the robust health planning process in North Carolina under the supervision of the SHCC and the Division of Health Service Regulation (DHSR) Healthcare Planning and Certificate of Need Section staff. Atrium supports the SHCC's proposed adjustments to the acute care bed need methodology to account for the COVID-19 pandemic impact on acute care utilization. Atrium appreciates the opportunity to provide these comments and reiterates its request that this petition be denied.