

July 29, 2023

Ms. Sandra Greene, PhD, Chair
State Health Coordinating Council

Andrea Emanuel, PhD, Interim Assistant Chief
Healthcare Planning and Certificate of Need Section
Division of Health Service Regulation

DHSR.SMFP.Petitions-Comments@dhhs.nc.gov

RE: Carolina Vascular Care, PLLC Petition for Two Operating Rooms to restricted to an Ambulatory Surgery Center and restricted to vascular access procedures in HSA VI.

Dear Dr. Greene and Dr. Emanuel,

I am writing to support the petition submitted by Carolina Vascular Care, PLLC for an adjusted need determination in the *2024 State Medical Facilities Plan* for two more operating rooms located in specialty ambulatory surgical centers restricted to outpatient vascular access procedures in HSA VI. I understand that these facilities will serve end-stage renal disease patients and ensure continued vascular access care for dialysis patients in an outpatient setting.

Presently, no ambulatory surgery centers or hospitals in HSA VI offer outpatient vascular access procedures. Our dialysis patients have very limited choices, but fortunately are able to currently get good vascular access care in the office-based center (OBL) in Rocky Mount. Unfortunately, this OBL in Rocky Mount and other similar OBL's in HSA VI are at high risk of closing down due to significant Medicare reimbursement cuts, unless they can convert to ASCs. Resultantly, our dialysis patients will suffer from not getting timely vascular access care which in turn could be life threatening due to missing dialysis. As a nephrologist and member of the local healthcare team, I have knowledge of the continued increase of dialysis patients in HSA VI and their ongoing vascular access needs. There is a critical need for multiple, locally accessible outpatient vascular access surgery centers in HSA VI to provide cost-effective, convenient, and high-quality outpatient vascular access care. The proposed ASCs would benefit our ESRD patients by ensuring on-going access to vascular access care for this vulnerable population.

I strongly support the petition from Carolina Vascular Care, PLLC to include a special need for two operating rooms restricted to vascular access procedures in ambulatory surgery centers in HSA VI. These vascular access operating rooms would benefit my patients by insuring ongoing access to timely outpatient vascular access care for this vulnerable patient population. Carolina Vascular Care has my support in this important community endeavor, and I hope you will approve of the special need. I would be happy to answer any questions you may have. Thank you for your time and attention to this critical issue.

Sincerely,



Charles Jere, MD
Boice-Willis Nephrology
901 N. Winstead Avenue
Rocky Mount, NC 27804

July 28, 2023

Ms. Sandra Greene, PhD, Chair
State Health Coordinating Council

Andrea Emanuel, PhD, Interim Assistant Chief
Healthcare Planning and Certificate of Need Section
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Presently, no ambulatory surgery centers or hospitals in HSA VI offer outpatient vascular access procedures. Our dialysis patients have very limited choices, but fortunately are able to currently get good vascular access care in the office-based center (OBL) in Rocky Mount. Unfortunately, this OBL in Rocky Mount and other similar OBL's in HSA VI are at high risk of closing down due to significant Medicare reimbursement cuts, unless they can convert to ASCs. Resultantly, our dialysis patients will suffer from not getting timely vascular access care which in turn could be life threatening due to missing dialysis. As a nephrologist and member of the local healthcare team, I have knowledge of the continued increase of dialysis patients in HSA VI and their ongoing vascular access needs. There is a critical need for multiple, locally accessible outpatient vascular access surgery centers in HSA VI to provide cost-effective, convenient, and high-quality outpatient vascular access care. The proposed ASCs would benefit our ESRD patients by ensuring on-going access to vascular access care for this vulnerable population.

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Sincerely,



Danilo Bernardo, MD
Valley Hypertension Nephrology Associates, PA
973 Gregory Drive
Roanoke Rapids, NC 27870

August 2, 2023

Ms. Sandra Greene, PhD, Chair
State Health Coordinating Council

Andrea Emanuel, PhD, Interim Assistant Chief
Healthcare Planning and Certificate of Need Section
Division of Health Service Regulation

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Sincerely,



Daqing Guo, MD
Valley Hypertension Nephrology Associates, PA
973 Gregory Drive
Roanoke Rapids, NC 27870

Laura K. Altom, M.D., M.S.P.H.
Stacy K. Bennett, M.D.
Dustin M. Bermudez, M.D.
Walter W. Burns III, M.D.
Chase L. Campbell, M.D.
Woodward Cannon, M.D.
Emil J. Cekada, M.D.
Albert S. Chang, M.D.
James B. Collins, M.D.
Carolyn S. Day, M.D.
Amita Desai, M.D.
Jeri E. Dickinson, M.D.
Joel B. Dragelin, M.D.
Barbara Z. Dull, M.D.
David B. Eddleman, M.D.
Kirk B. Faust, M.D.
Vincent A. Iannace, M.D.
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Uday S. Kavde, M.D.
Edward H. Kim, M.D.
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Rodney Lutz, M.D.
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Peter C. Ng, M.D.
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William L. Rucker, M.D.
Timothy S. Sadiq, M.D.
Lindsey S. Sharp, M.D.
Jordan A. Shealy, M.D.
Mark C. Sturdivant, M.D.
Anjali R. Thawani, M.D.
Katherine M. Trahan, M.D.
Paul Trotman, M.D.
Daniel R. Vig, M.D.
Seth M. Weinreb, M.D.
David C. White, M.D.
Linda M. Youngwirth, M.D.

Associate Vice President
Marc E. Gagnon, MBA

2800 Blue Ridge Road
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Raleigh, NC 27607

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Raleigh, NC 27617

1505 SW Cary Parkway, Suite 302
Cary, NC 27511

2076 NC Highway 42W, Suite 210
Clayton, NC 27520

300 Health Park Drive, Suite 110
Garner, NC 27529

781 Avent Ferry Road, Suite 214
Holly Springs, NC 27540

6602 Knightdale Boulevard,
Suite 201
Knightdale, NC 27545

3100 Duraleigh Road, Suite 205
Raleigh, NC 27612

300 Asheville Avenue, Suite 240
Cary, NC 27518

4207 Lake Boone Trail, Suite 210
Raleigh, NC 27607

131 E Market Street
Smithfield, NC 27577

11200 Governor Manly Way,
Suite 208
Raleigh, NC 27614

130 Glendale Drive West
Wilson, NC 27893

July 31, 2023

Ms. Sandra Greene, PhD, Chair
State Health Coordinating Council

Andrea Emanuel, PhD, Interim Assistant Chief
Healthcare Planning and Certificate of Need Section
Division of Health Service Regulation

DHSR.SMFP.Petitions-Comments@dhs.nc.gov

RE: Carolina Vascular Care, PLLC Petition for Two Operating Rooms to restricted to an Ambulatory Surgery Center and restricted to vascular access procedures in HSA VI.

Dear Dr. Greene and Dr. Emanuel,

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Presently, no ambulatory surgery centers or hospitals in HSA VI offer outpatient vascular access procedures. Our dialysis patients have very limited choices, but fortunately are able to currently get good vascular access care in the office-based center (OBL) in Rocky Mount. Unfortunately, this OBL in Rocky Mount and other similar OBL's in HSA VI are at high risk of closing down due to significant Medicare reimbursement cuts, unless they cannot convert to ASCs. Resultantly, our dialysis patients will suffer from not getting timely vascular access care which in turn could be life threatening due to missing dialysis. As a vascular access surgeon and member of the local healthcare team, I have knowledge of the continued increase of dialysis patients in HSA VI and their ongoing vascular access needs. There is a critical need for multiple, locally accessible outpatient vascular access surgery centers in HSA VI to provide cost-effective, convenient, and high-quality outpatient vascular access care. The proposed ASCs would benefit our ESRD patients by ensuring on-going access to vascular access care for this vulnerable population.

I strongly support the petition from Carolina Vascular Care, PLLC to include a special need for two operating rooms restricted to vascular access procedures in ambulatory surgery centers in HSA VI. Carolina Vascular Care has my support in this important community endeavor, and I hope you will approve of the special need. I would be happy to answer any questions you may have. Thank you for your time and attention to this critical issue.

Sincerely,



George Issacs, MD, FACS
North Carolina Surgery
130 Glendale Drive West
Wilson, NC 27893

July 28, 2023

Ms. Sandra Greene, PhD, Chair
State Health Coordinating Council

Andrea Emanuel, PhD, Interim Assistant Chief
Healthcare Planning and Certificate of Need Section
Division of Health Service Regulation

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RE: Carolina Vascular Care, PLLC Petition for Two Operating Rooms to restricted to an Ambulatory Surgery Center and restricted to vascular access procedures in HSA VI.

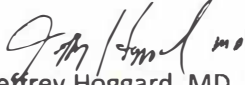
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Presently, no ambulatory surgery centers or hospitals in HSA VI offer outpatient vascular access procedures. Dialysis patients from HSA VI have very limited choices, but fortunately are able to currently get good vascular access care in the office-based centers (OBL) in Rocky Mount and Greenville. Unfortunately, these OBL's in HSA VI are at high risk of closing down due to significant Medicare reimbursement cuts, unless they can convert to ASCs. Dialysis patients will suffer from not getting timely vascular access care which in turn could be life threatening due to missing dialysis. As an interventional physician and member of the area healthcare team, I have knowledge of the continued increase of dialysis patients in HSA VI and their ongoing vascular access needs. There is a critical need for multiple, locally accessible outpatient vascular access surgery centers in HSA VI to provide cost-effective, convenient, and high-quality outpatient vascular access care. The proposed ASCs would benefit our ESRD patients by ensuring on-going access to vascular access care for this vulnerable population.

I strongly support the petition from Carolina Vascular Care, PLLC to include a special need for two operating rooms restricted to vascular access procedures in ambulatory surgery centers in HSA VI. Carolina Vascular Care has my support in this important community endeavor, and I hope you will approve of the special need. I would be happy to answer any questions you may have. Thank you for your time and attention to this critical issue.

Sincerely,


Jeffrey Hoggard, MD, FASN, FACP, FASDIN
Medical Director
Raleigh Access Center

August 2, 2023

Ms. Sandra Greene, PhD, Chair
State Health Coordinating Council

Andrea Emanuel, PhD, Interim Assistant Chief
Healthcare Planning and Certificate of Need Section
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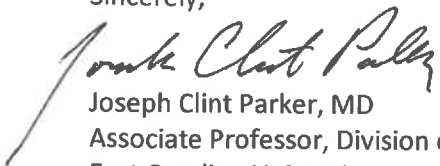
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Presently, no ambulatory surgery centers or hospitals in HSA VI offer outpatient vascular access procedures. Many dialysis patients have very limited choices, but fortunately are able to currently get good vascular access care in the office-based center (OBL) in Rocky Mount. Unfortunately, this OBL in Rocky Mount and other similar OBL's in HSA VI are at high risk of closing down due to significant Medicare reimbursement cuts, unless they can convert to ASCs. Resultantly, our dialysis patients will suffer from not getting timely vascular access care which in turn could be life threatening due to missing dialysis. As a nephrologist and member of the local healthcare team, I have knowledge of the continued increase of dialysis patients in HSA VI and their ongoing vascular access needs. There is a critical need for multiple, locally accessible outpatient vascular access surgery centers in HSA VI to provide cost-effective, convenient, and high-quality outpatient vascular access care. The proposed ASCs would benefit our ESRD patients by ensuring on-going access to vascular access care for this vulnerable population.

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Sincerely,



Joseph Clint Parker, MD
Associate Professor, Division of Nephrology
East Carolina University
Greenville, NC 27834

7/31/2023

Ms. Sandra Greene, PhD, Chair
State Health Coordinating Council

Andrea Emanuel, PhD, Interim Assistant Chief
Healthcare Planning and Certificate of Need Section
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Sincerely,



Lorenzo B. Santarina, MD
Valley Hypertension Nephrology Associates, PA
973 Gregory Drive
Roanoke Rapids, NC 27870

July 28, 2023

Ms. Sandra Greene, PhD, Chair
State Health Coordinating Council

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Sincerely,



Nakshatra Saxena, MD
Nephrologist in Rocky Mount, North Carolina

July 31, 2023

Ms. Sandra Greene, PhD, Chair
State Health Coordinating Council

Andrea Emanuel, PhD, Interim Assistant Chief
Healthcare Planning and Certificate of Need Section
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Presently, no ambulatory surgery centers or hospitals in HSA VI offer outpatient vascular access procedures. Our dialysis patients have very limited choices, but fortunately are able to currently get good vascular access care in the office-based center (OBL) in Rocky Mount. Unfortunately, this OBL in Rocky Mount and other similar OBL's in HSA VI are at high risk of closing down due to significant Medicare reimbursement cuts, unless they can convert to ASC's. Our dialysis patients will suffer from not getting timely vascular access care which in turn could be life threatening due to missing dialysis. As a nephrologist and member of the local healthcare team, I have knowledge of the continued increase of dialysis patients in HSA VI and their ongoing vascular access needs. There is a critical need for multiple, locally accessible outpatient vascular access surgery centers in HSA VI to provide cost-effective, convenient, and high-quality outpatient vascular access care. The proposed ASC's would benefit our ESRD patients by ensuring on-going access to vascular access care for this vulnerable population.

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Currently, Carolina Vascular Care is providing excellent access evaluation and care for our patients. We support their efforts to offer more dialysis access care and management.

I would be happy to answer any questions you may have. Thank you for your time and attention to this critical issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Nirav M. Jasani". The signature is written in a cursive style with a long horizontal stroke extending to the left.

Nirav M. Jasani MD
NC Kidney Care, PA
2605 Forest Hills Road, Suite A
Wilson, NC 27893

July 31, 2023

Ms. Sandra Greene, PhD, Chair
State Health Coordinating Council

Andrea Emanuel, PhD, Interim Assistant Chief
Healthcare Planning and Certificate of Need Section
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Sincerely,



Nivin Haroon, MD
Boice-Willis Nephrology
901 N. Winstead Avenue
Rocky Mount, NC 27804

July 31, 2023

Ms. Sandra Greene, PhD, Chair
State Health Coordinating Council

Andrea Emanuel, PhD, Interim Assistant Chief
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Sincerely,



Saritha Boyapati, MD
Boice-Willis Nephrology
901 N. Winstead Avenue
Rocky Mount, NC 27804



NC KIDNEY CARE, P.A.

R. William Bynum, IV, M.D.
Nirav M. Jasani, M.D.
Shiraz Sandhu, D.O.

July 31, 2023

Ms. Sandra Greene, PhD, Chair
State Health Coordinating Council

Andrea Emanuel, PhD, Interim Assistant Chief
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I would be happy to answer any questions you may have. Thank you for your time and attention to this critical issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Will Bynum, MD'. The signature is fluid and cursive, with a large initial 'W' and 'B'.

Will Bynum, MD
NC Kidney Care, PA
2605 Forest Hills Road, Suite A
Wilson, NC 27893

August 4, 2023

Ms. Sandra Greene, PhD, Chair
State Health Coordinating Council

Andrea Emanuel, PhD, Interim Assistant Chief
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Division of Health Service Regulation

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RE: Carolina Vascular Care, PLLC Petition for Two Operating Rooms to restricted to an Ambulatory Surgery Center and restricted to vascular access procedures in HSA VI.

Dear Dr. Greene and Dr. Craddock,

I am writing to support the petition submitted by Carolina Vascular Care, PLLC for an adjusted need determination in the *2024 State Medical Facilities Plan* for two more operating rooms located in specialty ambulatory surgical centers restricted to outpatient vascular access procedures in HSA VI. I understand that these facilities will serve end-stage renal disease patients and ensure continued vascular access care for dialysis patients in an outpatient setting.

I am the Davita dialysis Clinical Services Manager and cover most of Davita clinics in Eastern NC (HSA VI). Presently, no ambulatory surgery centers or hospitals in HSA VI offer outpatient vascular access procedures. Our dialysis patients have very limited choices, but fortunately are able to currently get good vascular access care in the office-based centers (OBL) in Rocky Mount or Greenville. Unfortunately, these vascular access OBL's in HSA VI are at high risk of closing down due to significant Medicare reimbursement cuts, unless they cannot convert to ASCs. Resultantly, our dialysis patients will suffer from not getting timely vascular access care which in turn could be life threatening due to missing dialysis. As a member of the local healthcare team, I have knowledge of the continued increase of dialysis patients in HSA VI and their ongoing vascular access needs. There is a critical need for multiple, locally accessible outpatient vascular access surgery centers in HSA VI to provide cost-effective, convenient, and high-quality outpatient vascular access care. The proposed vascular access ASCs would benefit our ESRD patients by ensuring on-going access to vascular access care for this vulnerable population.

I strongly support the petition from Carolina Vascular Care, PLLC to include a special need for two operating rooms restricted to vascular access procedures in ambulatory surgery centers in HSA VI. Carolina Vascular Care has my support in this important community endeavor, and I hope you will approve of the special need. I would be happy to answer any questions you may have. Thank you for your time and attention to this critical issue.

Sincerely,



Laurie Bailey RN, MSN, MBA, CNN
Manager Clinical Services
Carolina Waves Region 4

July 31, 2023

Ms. Sandra Greene, PhD, Chair
State Health Coordinating Council

Andrea Emanuel, PhD, Interim Assistant Chief
Healthcare Planning and Certificate of Need Section
Division of Health Service Regulation

DHSR.SMFP.Petitions-Comments@dhhs.nc.gov

RE: Carolina Vascular Care, PLLC Petition for Two Operating Rooms to restricted to an Ambulatory Surgery Center and restricted to vascular access procedures in HSA VI.

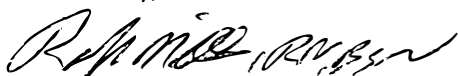
Dear Dr. Greene and Dr. Emanuel,

I am writing to support the petition submitted by Carolina Vascular Care, PLLC for an adjusted need determination in the *2024 State Medical Facilities Plan* for two more operating rooms located in specialty ambulatory surgical centers restricted to outpatient vascular access procedures in HSA VI. I understand that these facilities will serve end-stage renal disease patients and ensure continued vascular access care for dialysis patients in an outpatient setting.

Presently, no ambulatory surgery centers or hospitals in HSA VI offer outpatient vascular access procedures. Our dialysis patients have very limited choices, but fortunately are able to currently get good vascular access care in the office-based centers (OBL) in Rocky Mount or Greenville. Unfortunately, these vascular access OBL's in HSA VI are at high risk of closing down due to significant Medicare reimbursement cuts, unless they can convert to ASCs. Resultantly, our dialysis patients will suffer from not getting timely vascular access care which in turn could be life threatening due to missing dialysis. As a member of the local healthcare team, I have knowledge of the continued increase of dialysis patients in HSA VI and their ongoing vascular access needs. There is a critical need for multiple, locally accessible outpatient vascular access surgery centers in HSA VI to provide cost-effective, convenient, and high-quality outpatient vascular access care. The proposed vascular access ASCs would benefit our ESRD patients by ensuring on-going access to vascular access care for this vulnerable population.

I strongly support the petition from Carolina Vascular Care, PLLC to include a special need for two operating rooms restricted to vascular access procedures in ambulatory surgery centers in HSA VI. These vascular access operating rooms would benefit our patients by insuring ongoing access to timely outpatient vascular access care for this vulnerable patient population. Carolina Vascular Care has my support in this important community endeavor, and I hope you will approve of the special need. I would be happy to answer any questions you may have. Thank you for your time and attention to this critical issue.

Sincerely,



Ralph Mills RN, BSN
Director of Operations
Fresenius Medical Care
Eastern North Carolina Area