



January 3, 2011

Mr. Craig R. Smith, Chief  
Certificate of Need Section  
2704 Mail Service Center  
Raleigh, NC 27699-2704

RE: Comments Regarding Halifax Gastroenterology Certificate of Need Application  
CON Project ID # L-8614-10

Dear Mr. Smith,

The purpose of this letter is to provide comments regarding the Certificate of Need application by Halifax Gastroenterology for the proposed licensed ambulatory surgical facility with two endoscopy procedure rooms. The North Carolina Medical Society strongly supports the approval of this project because the application is consistent with the intent of the CON law, which provides that "physicians providing gastrointestinal endoscopy services in unlicensed settings should be given an opportunity to obtain a license to provide those services to ensure the safety of patients and the provision of quality care." See N.C. Gen Stat. § 131E-175 Findings of fact.

Halifax and Northampton Counties are medically underserved in terms of the number of physicians per capita and the number of gastroenterologists per capita. As a result, thousands of patients have traveled to more distant counties to obtain endoscopy procedures. The circumstances in Halifax and Northampton Counties are unique in that Dr. Yerra is the sole board-certified gastroenterologist serving a two county service area with a combined population of 75,000. Dr. Yerra has an existing medical office with an accredited office-based endoscopy suite that was constructed to meet the licensure standards. North Carolina counties of similar size to Halifax have one or more licensed ambulatory surgical facilities with endoscopy procedure rooms. Access to GI screening procedures at a reasonable cost is critical to prevention and early detection of colorectal disease. Obtaining a licensed ambulatory surgery facility with two endoscopy rooms will enable Dr. Yerra to recruit and retain a second gastroenterologist.

Approval of the Halifax Gastroenterology application is consistent with the renewed emphasis of the State Health Coordinating Council on quality, access and value. Further, the Halifax Gastroenterology application is consistent with the needs of the community and will improve access to care and patient safety in a licensed facility.

Sincerely,

Stephen W. Keene  
General Counsel