



SURGICAL CENTER
FOR DENTAL PROFESSIONALS

October 30, 2020

Ms. Martha Frisone, Chief
Healthcare Planning and Certificate of Need Section
Division of Health Service Regulation
2704 Mail Service Center
Raleigh, NC 27699-2704

Re: Comments on Valleygate Surgery Center's CON Application for an Ambulatory Surgical Facility in Wake County (Project ID #J-11961-20)

Dear Ms. Frisone:

As the medical director of the Surgical Center for Dental Professionals (SCDP), I find the allegations in the proposal submitted by Valleygate disingenuous, deceitful, offensive, inappropriate and unnecessary. The SCDP is the chosen demonstration project for the region (Region I: Health Service Area IV) and should be given the opportunity to serve the community as intended for the full duration of the demonstration period prior to considering another facility focused on dental surgery in the same region. As you are aware, the 2016 State Medical Facilities Plan indicated that the demonstration project would be evaluated after the facility had been in operation for three full federal fiscal years. The development of Valleygate in Garner would harm SCDP's ability to serve as the demonstration project for the State Health Coordinating Council (SHCC) as intended. SCDP currently is still in its ramp up phase of operations and with plenty of room for growth at the SCDP; as such, there is no need for another facility at this time.

I believe you should be aware and consider in your review that of the practices that are allegedly showing support for Valleygate, 11 of the 22 practitioners currently have credentials at SCDP and many currently have dedicated weekly block time. Of the ones that do not have weekly block time currently, they have been offered it and simply haven't been able to consistently utilize enough time to warrant a dedicated block. Despite this, they have adequate time for their current case loads and will be able to acquire block time as their needs grow. The remaining providers have yet to apply or inquire about credentials at SCDP. The SCDP has all seven rooms (two ORs and five procedure rooms) outfitted to OR standards and the entire facility is Joint Commission Certified. (We combined two of the original rooms to make a large teaching suite where we train dentists who have little or no operating room experience. This is part of their orientation and unique to our facility. This extra step is simply one of the many ways that we go above and beyond to ensure a safe environment.) Currently, the SCDP is utilizing two rooms and we are planning to open two more by the end of the first quarter of 2021. Our third room should be fully occupied by the end of 2020 with the fourth occupied by mid-2021. This will prompt the openings of the remaining rooms. This ramp up strategy has been our plan from the outset and has been slightly

delayed by events outside of our control (Construction delays and the COVID-19 pandemic). Despite Valleygate's statements to the contrary, **the SCDP has completed every single case it has ever completed in its walls with anesthesiologist coverage.** We have never once, not a single time, allowed the dentist to supervise the anesthesia process or assume that responsibility. We are a medical facility that is staffed with anesthesiologists for the anesthesia coverage. To say otherwise is simply untruthful. The SCDP opened its doors on 10/5/2018. To date we have completed 1,598 cases, 1,076 of which were completed prior to the end of 2019. To suggest that we have only ever completed 277 cases again is simply dishonest and based on outdated data. The SCDP has fulfilled its goal of making affordable care available to all. Out of our total of 1,598 cases, 1,159, or 73 percent, were Medicaid insured. This significantly exceeds the minimum Medicaid requirements of the demonstration project as well as Valleygate's Triad facility.

Finally, our growth has admittedly been slower than we have hoped. Part of this, as previously discussed, has been due to a late start from construction delays as well as the effect of the COVID-19 virus. In addition, reimbursement from Medicaid has been a fraction of what we anticipated based on our discussions with the Division of Medical Assistance, which negatively impacted our initial financial performance. Despite this fact, we have been committed to our mission of providing care for those who need it. We have worked diligently find alternative funding sources to allow our continued growth as well as to better manage our overhead and streamline our processes. This can be difficult in a start up scenario before a business reaches maturity, but we are confident that we have created a great long term outlook. The SCDP's CON is dental specific; however, our facility is uniquely capable of serving a medical population as well, within CON and SMFP guidelines. As a Joint Commission certified facility our infrastructure is hospital quality and uniquely poised to serve ENT very easily, and other specialties if permitted in future SMFPs. Our pre op screening and post op recovery nurses are top quality and come from hospital backgrounds. In conclusion, the SCDP was given a challenge to show its value over a specified period of time. The allegations and concerns voiced by Valleygate are false and misleading, the stated need does not exist and any competing facility in our region would simply lessen the chances of the demonstration project being successful. We wish you the best in making these difficult decisions. If there are other facts or figures that you would like to see, we would be obliged to help in any way that we can.

Dave

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