

## Wake Forest Baptist Health OR Methodology Workgroup Comments

1. Wake Forest Baptist Health (WFBH) is not in favor of utilizing Truven data for operating room need determination. The Truven data designates surgical cases by UB92 revenue codes 0360 – 0369. This methodology presents at least two major issues for identifying licensed OR surgical cases:
  - In addition to cases that occur within a licensed OR, this methodology also includes cases that occur outside of a licensed OR (such as minor procedure rooms, endoscopy suites, etc.). This results in an inaccurate count of licensed OR surgical cases.
  - ASCs have not consistently reported UB92 revenue codes 0360 – 0369, which again, contributes to an inaccurate count of licensed OR surgical cases

WFBH agrees that Truven could be an ideal data source for the OR need determination if these issues were resolved. However, WFBH is not in favor of using Truven data for this purpose until the surgical case definition can appropriately identify all cases performed in a licensed OR. WFBH recommends that: 1) effort be put into aligning Truven's definition with cases that occur in a licensed OR, and 2) until such time as the Truven definition is amended to reflect true OR activity, the current use of licensure data be used to inform OR need determination.

2. The standard case length methodology of 1.5 hours per inpatient case and 3.0 hours per outpatient case does not accurately reflect the length of cases performed at Academic Medical Centers. Academic Medical Centers in North Carolina consistently report average case lengths well beyond these thresholds in the annual license renewal applications. Furthermore, outpatient cases performed at Academic Medical Centers in North Carolina have steadily risen in average case length over the past three years.

At North Carolina Baptist Hospital (NCBH), the average inpatient case length reported in the 2016 hospital license renewal application was 242.2 minutes and the average outpatient case length was 134.7 minutes. These lengths are 62.2 minutes and 44.7 minutes over the CON methodology thresholds. Other hospitals<sup>1</sup> in NCBH's service area averaged 139 minutes for inpatient cases and 84 minutes for outpatient cases. These lengths are 41 minutes and 6 minutes under the CON methodology thresholds. (See attached charts, which are based on 2016 Hospital License Renewal Application data)

WFBH suggests either actual minutes or a tiered methodology be utilized in the OR need determination methodology.

3. The OR need determination methodology should account for limitations posed by specialty operating rooms – such as rooms that house robots and specialized imaging equipment. The special needs of the cases requiring this equipment makes it possible to only perform the cases in these designated spaces. The existence of this equipment makes it difficult to use these rooms for other purposes.

WFBH suggests including a break-out of number of specialty operating rooms and the number of cases performed in these operating rooms in future LRAs. This will provide baseline data to assess the impact and provide a potential pathway for developing a separate need determination in the future.

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<sup>1</sup> Includes Forsyth Medical Center (all ORs on the license), Medical Park Hospital, Davie Medical Center, Hugh Chatham, Northern of Surry County, Thomasville Medical Center, Lexington Medical Center, Cone Health (all), High Point Regional, Iredell Memorial Hospital, Catawba Valley Medical Center, and Wilkes Regional Medical Center

Chart 1: Inpatient Average Case Lengths, Select Hospitals in NCBH Service Area  
 Data Source: 2016 Hospital License Renewal Applications

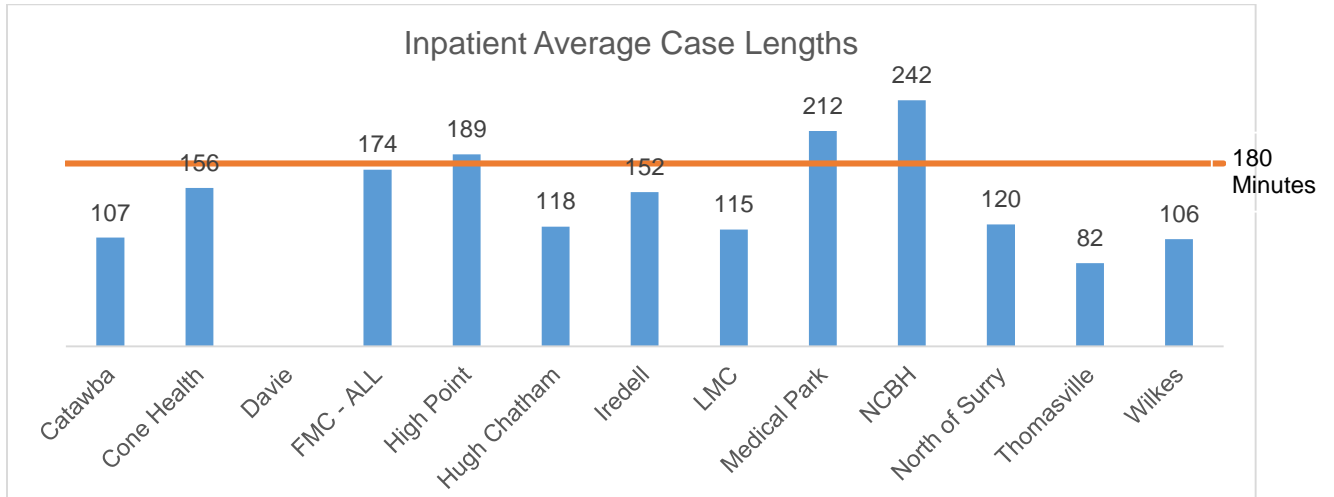


Chart 2: Outpatient Average Case Lengths, Select Hospitals in NCBH Service Area  
 Data Source: 2016 Hospital License Renewal Applications

