

**DukeMedicine**

Duke University Health System

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Chief Planning Officer

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Ms. Carol Potter
Ms. Victoria McClanahan
Medical Facilities Planning Section
Division of Health Service Regulation
2714 Mail Service Center
Raleigh, NC 27699-2714DFS Health PLANNING
RECEIVED

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Medical Facilities
PLANNING SECTIONRe: Proposed 2010 State Medical Facilities Plan

Dear Ms. McClanahan and Ms. Carol Potter:

This letter forwards the comments of Duke University Health System on the Proposed 2010 State Medical Facilities Plan.

On the Acute Care Bed Need Methodology:

We support the finding of the Acute Care Services Committee and the State Health Coordinating Council that the Acute Care Bed Need Methodology Work Group should be reconvened in the fall "to review additional [and refreshed] data and to consider changing the Acute Care Bed Need Methodology in the spring of 2010."

On the demonstration sites testing the costs and benefits of Single Specialty Ambulatory Surgery Centers:

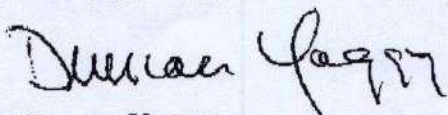
We believe that the demonstration sites should be required to report each year: the names of the physicians providing procedures at the site during the preceding year; the distribution of those procedures by payer; and the names of the hospitals where those physicians have admitting privileges. The hospitals where they have privileges should be asked to report, for each of those same physicians, the distribution of their procedures by payer and the changes from the prior year. Finally, we also recommend that the sites clearly distinguish between the indigent uninsured patients and the self-pay patients served each year.

On the finding of no need for additional mobile MRI scanners anywhere in the state:

We support the finding. Since the volume of procedures is going down, especially in rural areas, and many fixed MRIs in rural hospitals are underutilized, it is difficult to imagine a justification for additional mobiles.

Thank you for your consideration of these comments.

Sincerely,



Duncan Yaggy
Chief Planning Officer
Duke University Health System