

Nash Health Care Systems

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Comment on Petition from Affordable Health Care Facilities

Submitted to

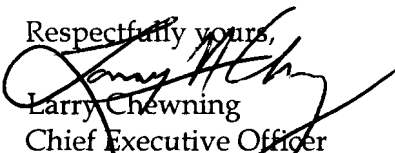
Dr. Sandra B. Greene., Chair
Acute Care Services Committee
c/o Medical Facilities Planning Section
Division of Health Service Regulation
2714 Mail Service Center
Raleigh, NC 27699-2714

Submitted by

Larry Chewning
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Nash Health Care (NHC) submits the following comments on the petition filed by Affordable Health Care Facilities (AHCF) to revise the Single Specialty Ambulatory Surgery Demonstration Project. NHC believes that the AHCF petition contains many of the recommendations already considered fully by the workgroup, which did not end up in the proposed Demonstration Project. In addition, AHCF includes language that expresses its distaste for the NC health planning process, the SHCC, and the NC CON law. Clearly AHCF is not satisfied with the scope of the Demonstration Project, but would like to expand it to include many other counties across the state. The petition includes no statistical evidence that these counties need Single Specialty ASC's, nor that existing providers will not be harmed by the expansion of the Demonstration Project. Rather, AHCF states that it has an interest in developing multiple ASC's across the state, which is clearly in its own self-interest. Expanding the counties for the Demonstration Project outside of the large metropolitan areas can endanger existing providers, such as NHC. According to the *Proposed 2010 SMFP*, Nash County shows a surplus of nearly three operating rooms. Allowing the development of additional operating rooms in Nash County at this time could have a potentially negative impact on the existing operating rooms. While this underutilization can be more easily absorbed in larger counties, such as those included in the proposed Demonstration Project, it can be devastating to providers in smaller counties, like Nash. We sincerely hope that the Acute Care Services Committee and SHCC will maintain the scope of the Demonstration Project, and we believe that the AHCF petition should be denied.

Respectfully yours,


Larry Chewning
Chief Executive Officer

