  
**UNIVERSITY HEALTH SYSTEMS**  
*of Eastern Carolina*

OFFICE OF PLANNING

August 26, 2009

Ms. Victoria McClanahan, Planner  
Ms. Carol Potter, Planner  
Medical Facilities Planning Section  
North Carolina Division of Health Service Regulation  
2714 Mail Service Center  
Raleigh, North Carolina 27699-2714

DFS Health Planning  
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Medical Facilities  
PLANNING SECTION

**Re: Proposed 2010 SMFP - Acute Care Services Petitions and Comments**

Dear Ms. McClanahan and Ms. Potter:

Thank you for the opportunity to submit written comments on the petitions and comments regarding the Acute Care services in the proposed 2010 SMFP. The comments provided below are on behalf of University Health Systems of Eastern Carolina (UHS).

*Acute Care Bed Need Methodology*

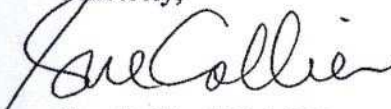
UHS agrees with the petitions and comments demonstrating the need to revisit the use of a statewide growth rate in the acute care bed need methodology. We strongly support reconvening a Bed Need Task Force early in fall 2009 to re-evaluate the bed need methodology and to consider changes as early as spring 2010.

*Single Specialty Ambulatory Surgery Center Demonstration Project*

UHS supports combining HSAs to create three separate service areas for the entire state. We believe any applicant that can demonstrate cost reduction, quality improvement, and the ability to meet the needs of the medically underserved should be considered equally in the CON review. Additionally, we believe any proposal for a separately licensed, single specialty ambulatory surgery center should be eligible for participation in the demonstration project, regardless of percent physician ownership. UHS supports separate percentage requirements for Medicaid and self-pay patients and the requirement that physicians involved in the demonstration project establish or maintain privileges at an area hospital and begin or continue to meet ED coverage responsibilities. These expectations must be met in order to assure integration of the patients' healthcare needs across the entire care continuum.

Thank you for considering these comments and feel free to contact me at 252-847-2222 if you have any questions or need additional information.

Sincerely,



Sue Collier, RN, MSN  
Vice President, Planning & Strategic Development  
University Health Systems of Eastern Carolina