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North Carolina Hospital Association

February 24, 2011

MEMORANDUM

TO: Hon. William Wainwright, SHCC Chairman
Ms. Elizabeth K. Brown, Section Chief, Budget and Planning

FROM: Mike Vicario, NCHA Vice-President of Regulatory Affairs

SUBJECT: Posting of Need Determination Tables

DFS Health Planning
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MAR 02 2011
Medical Facilities
PLANNING SECTION

The North Carolina Hospital Association requests that the State Health Coordinating Council provide notice of CON application due dates three months prior to the first "Certificate of Need Application Due Date" scheduled in the State Medical Facilities Plan.

As you know the 2011 State Medical Facilities Plan includes need determinations for numerous types of facilities, equipment and services. Table 3A in the Proposed State Medical Facilities Plan includes a general review schedule, but does not contain the specific Certificate of Need review dates for individual service areas. Those dates, along with the quantity of new services needed and the CON application due dates; can be found only in the table at the end of each chapter (*See Table 5B, Tables 6C and 6D, Table 8B, Table 9H etc.*) in the *final* State Medical Facilities Plan. Therefore the specific review dates for many of the beds, equipment and services do not become public information until the SMFP is endorsed and published, normally at the end of December. CON applications are often due in mid February, which leaves only a few weeks to complete and submit an application. As the preparation of a CON application is a complex and time-consuming process, The North Carolina Hospital Association requests that the SHCC provide notice of individual CON application due dates prior to the Governor's final endorsement of the State Medical Facilities Plan. We recommend that all of these tables be posted on the Division's public website, along with any needed disclaimers regarding their finality, at least three months prior to the first "Certificate of Need Application Due Date" as scheduled in the State Medical Facilities Plan.

We believe incorporating this practice will enable hospitals and other CON preparers to budget their time and resources in order to prepare and submit an approvable Certificate of Need Application.

Thank you for your consideration and please feel free to contact me if you have any questions.

c: Craig R. Smith, Chief, Certificate of Need Section