

Via E-Mail – DHSR.SMFP.Petitions-Comments@dhhs.nc.gov
North Carolina Division of Health Service Regulation
Medical Facilities Planning Section
Council Building
701 Barbour Drive
Raleigh, NC 27603

Re: Opposition to Novant Health, Inc.'s Petition Concerning SMFP Policy AC-3

Dear Sir or Madam,

On behalf of Nash Health Care System, I am writing to relay our opposition to the Petition filed on March 2, 2011, by Novant Health, Inc., which effectively seeks to repeal or render useless Policy AC-3 in the 2012 State Medical Facilities Plan (“SMFP”). I believe their petition to serve only to improve their competitive market position and ignores the best interests of patients served at Academic Medical Centers.

The Academic Medical Center Teaching Hospitals (“AMCs”) play a unique and important role in North Carolina’s health system. We regularly refer patients to Pitt County Memorial Hospital. We rely upon all the AMCs to educate and teach health care professionals that provide services in our facility. The AMCs provide a valuable service to the State of North Carolina in their teaching role, a referral base and as a safety net for community hospitals in the state. Further, the AMCs perform valuable research activities that lead to new technologies and treatment methods which are sometimes implemented down the road in non-AMC facilities. All of this has improved patient care. Two examples of this at the Nash Health Care System include our (1) expanded invasive cardiology program made possible through a partnership with Pitt County Hospital and (2) offering clinical trial protocols locally to oncology patients through a UNC Hospital relationship.

In our view, it would be detrimental to health services in North Carolina for Policy AC-3 to be repealed or rendered ineffective as sought by Novant. Policy AC-3 works to provide the AMCs with an avenue to expand their facilities for teaching or research purposes. Therefore, we strongly recommend that Novant’s Petition be denied.

Sincerely,

Larry H. Chewing

President and Chief Executive Officer