



August 16, 2013

The State Health Coordinating Council, and
Medical Facilities Planning Branch
DHSR, DHHS
2714 Mail Service Center
Raleigh, NC 27699-2714

RE: Comments Regarding Veritas Collaborative Petition

State Health Coordinating Council and Medical Facilities Planning Staff,

The enclosed comments are submitted on behalf of UNC Hospitals and the UNC Center of Excellence for Eating Disorders.

If you have any questions, please contact me at 919-966-1129.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Dee Jay Zerman".

Dee Jay Zerman
Director of Regulatory Planning
UNC HCS
Hedrick Building
211 Friday Center Drive
Chapel Hill, NC 27517

Comments on Veritas Collaborative Petition for an Adjusted Need Determination for 24 Adult Inpatient Psychiatric Beds for Eating Disorders in Durham County

Commenter

University of North Carolina Hospitals at Chapel Hill
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Contact

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UNC Hospitals provides a comprehensive array of health care services including inpatient psychiatric beds for both youth and adults with eating disorders. UNC Hospitals and the UNC Center of Excellence for Eating Disorders program appreciate the opportunity to submit comments regarding the petition submitted by Veritas Collaborative.

The UNC Center of Excellence for Eating Disorders (“UNC-CEED”) serves citizens from throughout North Carolina. Since 2003, the UNC program has developed into a model evidence-informed, comprehensive, university-based program providing the highest standard of care for individuals with eating disorders and their families. In 2012, the program received the designation of Center of Excellence within the Department of Psychiatry at the University of North Carolina at Chapel Hill. The 10-bed inpatient program is part of a continuum of services that also includes partial hospitalization and outpatient treatment programs (offering individual, group, family treatment and nutrition services). Admissions to the 10-bed unit are not dependent upon patient age; all of the beds can be used to serve either pediatric or adult patients. No patients have been denied access to the UNC-CEED unit due to the unavailability of beds.

The UNC faculty and staff work to understand the unique needs of each patient and family and to create a developmentally appropriate treatment plan. The UNC treatment program is further enriched by being on the leading edge of both clinical and basic research. From bench to bedside, basic researchers associated with the program are working to understand the causes of eating disorders and clinical researchers are developing novel methods to enhance and tailor treatment. The full continuum of care and the dedication to evidence-informed treatments renders UNC-CEED a unique resource for the citizens of North Carolina.

UNC Hospitals supports the standard methodology for evaluating the need for inpatient psychiatric beds that is included in the Proposed 2014 State Medical Facilities Plan; the Plan shows no need for additional adult psychiatric beds in Durham County. The Veritas Collaborative petition for an adjusted need determination of 24 inpatient beds for eating disorders lacks critical information and fails to demonstrate that the request is based on the needs of the adult population of the Durham County service area.

The Veritas Collaborative petition should not be approved because critical information is omitted, including essential items listed in the instructions for writing petitions described in the 2013 State Medical Facilities Plan (“SMFP”). The petition addresses none of the following information requests that are quoted from the SMFP:

Statement of the adverse effects on the population of the affected area that are likely to ensue if the adjustment is not made, and;

A statement of the alternatives to the proposed adjustment that were considered and found not feasible.

Evidence that the health service development permitted by the proposed adjustment would not result in unnecessary duplication of health resources in the area.

Evidence that the requested adjustment is consistent with the three Basic Principles governing the development of the North Carolina State Medical Facilities Plan: Safety and Quality, Access and Value.

No need methodology or assumptions are provided by the petitioner to demonstrate that the adult population of Durham County has sufficient demand to support the request for 24 specialty beds. As seen in Table 15B of the Proposed 2014 State Medical Facilities Plan, the Durham County service area, with a projected population of 237,424 adults, has a surplus of 16 general adult inpatient psychiatric beds. This surplus is the largest of all of the service areas with total projected adult populations of less than 250,000. If the 24 specialty beds were added to the present inventory, the projected surplus would jump to 40 beds. Consequently, the approval of the petitioner’s request would add excess capacity and result in a geographical maldistribution of health service resources.

UNC Hospitals has additional concerns regarding this petition that relate to patient access, duplication of existing services, adequacy of medical care, and coordination with the existing healthcare systems.

- The petition fails to discuss how the project will enhance access by the medically underserved patient population. The petition includes no statement regarding access for Medicaid, Medicare, and other medically underserved patients. Veritas Collaborative currently provides no psychiatric services to Medicaid and Medicare patients. In contrast, other providers, including UNC-CEED, provide access to inpatient psychiatric services for all categories of patients who have urgent need for treatment, including eating disorders.
- UNC Hospitals is convinced that the petition request is duplicative of the existing ten inpatient beds of UNC-CEED. Approval of the petition would result in an unnecessary facility that would divert insured and self-pay patients from existing hospital-based facilities.
- Medical and psychiatric morbidity and comorbidity in adults with eating disorders are high. As such, services for adults with eating disorders should include ready access to a

number of consultants not available in a free-standing inpatient facility. For example, UNC-CEED patients are frequently referred to cardiology, GI, infectious disease, nephrology, interventional radiology, physical therapy, OB/GYN, endocrinology, general internal medicine, neurology, dermatology, dentistry, and other services available on site at UNC Hospitals. However, the Veritas petition includes inadequate documentation from physician specialists, acute care hospitals, and emergency department physicians, to demonstrate proper coordination of services for patients.

For the reasons discussed above, UNC Hospitals requests that the State Health Coordinating Council deny the Veritas Collaborative petition and rely upon the standard methodology that forecasts no need determinations for additional inpatient adult psychiatric beds for Durham County.