



WAKE
OMS

WAKE ORAL AND MAXILLOFACIAL SURGERY

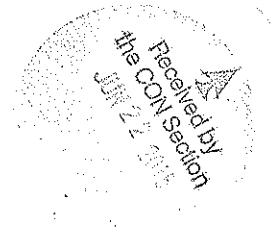
Dental Implants • Reconstructive Surgery • Wisdom Teeth

June 19, 2015

Scott A. Hum, DMD, PA

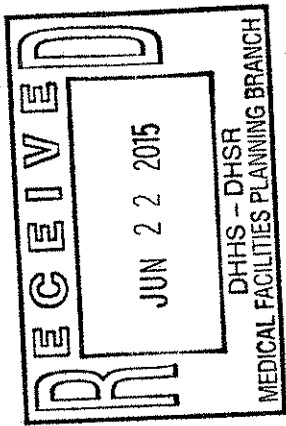
*Diplomate, American Board
of Oral and Maxillofacial
Surgery*

Health Care Planning and Certificate of Need Section
Division of Health Service Regulation
NC State Health Coordinating Council
2704 Mail Service Center
Raleigh, North Carolina 27699-2704



Re: Certificate of Need for "Solferino North"

I am writing to express my opposition to the issuance of a Certificate of Need to the proposed ambulatory surgery center, Solferino North to be located in Raleigh, North Carolina. The supposed driving force behind this dental ambulatory surgery center as published in the Solferino North literature is to provide access to dental care for children and to serve as a solution to the access to dental care problem in North Carolina. I would offer the following concerns to the proposed CON:



1. If Solferino North seeks to address the access to dental care problem in North Carolina, why would they locate their surgery center in one of the wealthiest counties in North Carolina? Why not Edgecombe, Franklin or Nash county that all have a significant lack of access to dental care?
2. What "need" is Solferino North addressing by having 3D cone beam computed tomography and the most up to date dental implant systems at their proposed surgery center? Children with lack of access to dental care in North Carolina don't need 3D cone beam radiography and expensive dental implant surgery. Additionally, there are multiple general dental and dental specialty offices in Raleigh that already own and operate 3D CBCT machines.
3. How will a facility staffed by non-Wake County resident anesthesia and surgery personnel provide after hours and emergency care to patients receiving care at Solferino North in Raleigh?
4. How much "need" is there for outpatient dental anesthesia and sedation when there are already a dozen or more Board certified Oral and Maxillofacial Surgeons and another dozen Periodontists in Wake County that already provide outpatient anesthesia and sedation services to patients seeking dental surgery and implant placement under anesthesia?

In summary, I do not see a need for an outpatient dental surgery center in Raleigh, North Carolina and am opposed to the issuance of a Certificate of Need to Solferino North. Thank you for your time in listening to my concerns.

Sincerely,

Scott A. Hum, DMD, MS

2500 Blue Ridge Rd. Suite 201 • Raleigh, North Carolina 27607
tel (919) 783-9920 • fax (919) 783-7026 • www.wakeoms.com