

August 10, 2015

Dr. Christopher Ullrich, Chair, SHCC
c/o North Carolina Division of Health Service Regulation
Healthcare Planning and Certificate of Need Section
2714 Mail Service Center
Raleigh, North Carolina 27699-2714

RE: Petition for Special Need Adjustment for Nursing Care Beds in Nash County

Dear Dr. Ullrich:

WakeMed supports the petition filed by LifeCare Hospitals of North Carolina to allocate additional skilled nursing beds to care for patients with complex conditions not typically accepted by most SNFs in the state.

Patients with particular conditions are not accepted at most skilled nursing facilities, and those that do accept them are usually full. This includes bariatric patients, patients who cannot be weaned from ventilators, those needing dialysis, patients with tracheostomies, complex wounds, for those that receive Total Parenteral Nutrition, or combinations of such conditions. When attempting to discharge patients who have one or more of these conditions from our hospitals directly to a skilled nursing facility, we are often unable to find placement, and the patients must stay in an acute setting. This delays fragile patients from receiving care in the most appropriate clinical setting, is upsetting for their families and adds unnecessary costs to the healthcare system.

As a tertiary acute care hospital, we often discharge patients to LifeCare when they are in need of long term care that is most appropriately provided in an LTCH setting. Through care provided at LifeCare, the acute phase of their illness subsides for many of these patients, yet many need post-LTCH-care in a skilled nursing setting.

Skilled nursing facilities play an important role in the patient care continuum; however, it is understandable that most simply cannot care for patients with high acuity. For that reason we support the LifeCare petition and hope that they are eventually able to obtain a CON for this service. While we recognize that the approval of their petition will not guarantee them a CON, we hope the SHCC will recognize that as an existing LTCH provider, their ability to develop a SNF on their campus to provide care to these patients with special needs would be a tremendous benefit to patients. LifeCare already has the expertise to care for these types of patients in its LTCH; this experience and the services already available on its campus will enable it to provide effective skilled nursing care as well.

We believe that LifeCare's petition demonstrates a special need for the allocation of these beds in Nash County, and we fully support the approval of its petition.

Please let me know if I can be of further assistance in your efforts.

Sincerely,



W. Stan Taylor
Vice President Corporate Planning