

Christopher Ullrich, M.D., Chairman
North Carolina State Health Coordinating Council and Technology and Equipment Sub-Committee
c/o Healthcare Planning Section
Division of Health Service Regulation
2714 Mail Service Center
Raleigh, NC 27699-2714

Re: Novant Health Comments Regarding the OrthoCarolina Petition to Adjust the Charity Care Calculation for North Carolina ASC Demonstration Project

Dear Dr. Ullrich:

Novant Health appreciates the opportunity to comment on the Petition submitted by OrthoCarolina (OC) to adjust the charity care calculation for North Carolina ASC Demonstration Project in the 2018 State Medical Facilities Plan. OC proposes to decrease the “community benefit care” required target to 5% AND to exclude revenue from procedures that do not yet have a Medicare allowable amount or are not currently ASC approved by Medicare from the denominator in calculating the “community benefit care”.

Novant Health believes the ASC Demonstration Project should continue as originally proposed and be reviewed at the end of the five-year timeframe, as originally intended. OC’s argument is that it is challenging to work with indigent patients. However, nowhere does OC indicate that there is a lack of such patients.

OC states that “When the 7% Community Benefit Care was proposed in late 2008, early 2009, many of the cases that are now capable of being done in an ASC were not even contemplated. The formula was fair and reasonable at that time, as most ASC cases had Medicare allowable rates. That is not so any longer, as many of the cases Mallard Creek performs are absent the Medicare allowable.”

Simply said, OC wants to remove patients from the denominator that receive more complex surgical care for which there is no allowable Medicare rate. This typically implies that these cases are healthy, commercially insured patients though OC does not provide any detail regarding the type of patients for whom they are providing “more complex surgical care”. If they are healthy commercially insured patients, removing them from the denominator simply makes it easier for OC to “hit the 7% target.” How many of these patients are indigent? Do any of these patients have other health complications? How many are Medicaid? What type of after care is needed, and would an indigent or Medicaid patient even have this support at home? How many are Medicare? How much longer do these cases take? Are they taking up time that simpler cases for indigent patients could have utilized?

Without further detail regarding the type of patients currently receiving “more complex surgical care” at Mallard Creek, it is not reasonable to remove them from the denominator of the

equation. If all of these patients are insured patients, removing them from the denominator is contrary to the intent of the original demonstration project, which was to increase quality & safety, value, and access for ALL patients, not just those who can already seek care at an ASC. Therefore, the SHCC should deny this proposed change in the ASC Demonstration Project.

OC also requests that the "Community Benefit Care" percentage be decreased to 5%. However, OrthoCarolina has shown limited evidence of their efforts to serve this community. OC does not mention working with hospitals and emergency departments – areas where many individuals with Medicaid or self-pay continue to seek care. As a provider located in OC's primary service area, Novant Health can confirm that they have not partnered with Novant Health hospitals such as COH and PMC to identify these patient needs, despite our routine recurring meetings between our management teams and requests for OC to continue to serve our indigent populations in Novant Health's emergency departments.

OC provides one short paragraph in their Petition regarding difficulties they have providing access for the underserved. This hardly seems like a reason to lower the standard to which their Demonstration Project is held. Furthermore, no petitions to amend the 7% factor were filed by the other two single specialty demonstration project ASCs in Forsyth and Wake Counties with concerns about the 7% factor. Several questions should be addressed before considering amending the Demonstration Project. Are they working with the Federally Qualified Health Centers? Have they reached out to the hospitals to identify charity care patients in need of orthopedic care? Do they reach out to the hospitals on a routine basis to identify charity care patients appropriate for care in an ASC? Have they reached out to CCNC, the health department, social services? OC provides little detail regarding their efforts to date to achieve the 7% target.

The 7% Community Benefit Care was intended by the state to be a proxy for a certain level of charity/indigent care that was to be provided by a demonstration project single specialty ASC on an annual basis. This ensures that valuable community resources like operating rooms are used to serve the entire community, including those who have difficulty accessing healthcare services. We respectfully request you deny the proposed Petition to preserve the integrity of intent of the Demonstration Project. Thank you for the opportunity to submit our concerns regarding this Petition.

Sincerely,



Leslie Barrett
Novant Health, Inc.
Vice President Surgical Services

CC: Barbara L. Freedy, Director CON, Novant Health
blfreedy@novanthealth.org

File: NH Comments Against OC OR Demo PetitionV2.08.10.2017.docx

Attachment A

The following three spreadsheets compare the payor mix included in the 2017 LRA for each of the three Single Specialty Demonstration ASC Facilities to the payor mix for all other ASCs reported on their 2017 LRAs.

The attached data is provided to illustrate that overall the existing multispecialty surgical facilities did a better job providing ambulatory surgical care to the combined Medicaid self-pay population than the specialty ASCs did in 2017. This is only one point of comparison but is provided to suggest that additional analysis is needed before any changes are made to the demonstration projects targets.

Sort By SelfPay + Medicaid

	Self Pay/ Indigent/ Charity	Medicare & Managed Care	Medicaid	Commercial Insurance	Managed Care	Other	Total	Self Pay/ Indigent/ Charity	Medicare & Managed Care	Medicaid	Commercial Insurance	Managed Care	Other	Total	Self Pay + Medicaid
Plastic Surgery Center of North Carolina	169	0	0	0	0	0	169	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%	100.0%
Wilson OBGYN	5	38	1	45	10	8	93	0.0%	0.0%	40.9%	48.4%	0.0%	6.3%	100.0%	40.9%
Premier Surgery Center	40	254	948	1370	2	2514	1.6%	10.1%	33.7%	54.6%	0.0%	0.0%	0.1%	100.0%	35.3%
Blount Ophthalmic Surgery Center	22	1346	1281	1801	216	4647	0.5%	29.0%	27.1%	38.6%	0.0%	0.0%	4.6%	100.0%	27.6%
Fredell Head Neck and Ear Ambulatory Eye Surgery and Laser Clinic	8	384	306	435	148	1281	0.6%	30.0%	23.9%	34.0%	0.0%	0.0%	11.6%	100.0%	24.5%
The Surgery Center at Southeastern Health Park	34	1612	739	800	167	3354	1.0%	48.1%	22.0%	23.9%	5.0%	0.1%	10.0%	100.0%	23.0%
Carolina Specialty Surgery	19	2158	632	21	941	97	3865	0.5%	55.8%	16.3%	2.5%	24.3%	2.5%	100.0%	16.8%
Surgicenter of Eastern Carolina	142	4108	1835	30	5204	475	11754	1.2%	34.8%	15.6%	0.3%	44.1%	4.0%	100.0%	16.8%
Novant Health Ellingham Outpatient Surgery	293	757	87	12	1219	42	2415	12.1%	31.3%	3.6%	0.7%	50.5%	1.7%	100.0%	15.7%
Blue Ridge Surgery Center	96	2158	1294	12	5122	284	8998	1.1%	24.1%	14.4%	0.1%	57.1%	3.2%	100.0%	15.5%
High Point Surgery Center	31	1500	615	19	1929	117	4211	0.7%	33.6%	14.6%	0.3%	45.8%	2.8%	100.0%	15.3%
Myland Green Surgery Center	174	216	179	197	1238	249	2313	7.5%	11.9%	8.5%	8.5%	53.5%	10.8%	100.0%	15.3%
Spencerville Anusurg Center	68	4824	1845	9	6713	393	12952	0.5%	38.0%	14.2%	0.1%	44.1%	3.0%	100.0%	14.8%
Surgery Center of Pinebluff	48	2924	1008	601	2648	7297	13.6%	41.0%	8.2%	36.3%	0.0%	0.7%	100.0%	14.5%	
Union West Surgery Center	26	1148	359	47	1146	18	2744	0.9%	41.8%	13.1%	1.7%	41.8%	0.7%	100.0%	14.0%
Gateway Surgery Center	78	3200	1405	5545	683	90	11002	0.7%	29.1%	12.8%	50.4%	6.2%	0.8%	100.0%	13.5%
Piedmont Surgery Center	31	111	47	395	0	0	584	5.3%	19.0%	8.0%	67.8%	0.0%	0.0%	100.0%	13.4%
Cleveland Ambulatory Services	10	1398	452	1838	0	10	3746	0.3%	37.6%	12.2%	46.5%	0.2%	0.3%	100.0%	12.4%
Eastern Regional Surgical Center	20	1275	248	805	80	53	2481	0.8%	51.4%	10.0%	32.4%	3.2%	2.1%	100.0%	10.8%
South Park Surgery Center	29	4956	1018	16	6103	840	14881	1.8%	42.8%	8.6%	0.1%	41.0%	5.6%	100.0%	10.4%
Abbeville Eye Surgery/Sight Center	408	3864	118	135	978	6	5500	7.4%	70.3%	2.1%	2.3%	17.8%	0.1%	100.0%	9.6%
Winnington Surge	95	4079	751	88	2825	622	9041	1.1%	51.8%	8.3%	0.2%	31.2%	6.9%	100.0%	9.4%
Raleigh Plastic Surgery Center, Inc.	39	88	1	375	0	0	501	7.8%	17.2%	0.2%	74.9%	0.0%	0.0%	100.0%	8.0%
Rea Surgery Center	95	745	236	3818	0	0	4894	1.9%	15.2%	4.8%	78.0%	0.0%	0.0%	100.0%	6.8%
Triangle Orthopaedic Surgery Center	55	293	96	1481	15	331	2281	2.4%	12.5%	4.2%	65.5%	0.7%	14.6%	100.0%	6.7%
Novant Health Huntersville Outpatient Surgery	19	1075	111	10	998	47	2261	0.8%	47.6%	4.9%	0.4%	44.1%	2.1%	100.0%	5.7%
Charlotte Surgery Center	89	2957	444	38	5078	746	8510	1.0%	31.6%	4.7%	54.3%	8.0%	100.0%	5.7%	
Capital City Surgery Center	57	2419	427	5275	332	332	8510	0.7%	28.4%	5.0%	62.0%	0.0%	3.9%	100.0%	5.7%
Orthopaedic Surgery Center of Asheville	5	1120	157	58	381	1371	3092	0.2%	36.2%	5.1%	1.9%	12.3%	44.3%	100.0%	5.2%
Iredell Surgical Center	2	806	50	130	199	199	1187	0.2%	67.9%	4.2%	11.0%	0.0%	16.8%	100.0%	4.4%
James E. Davis Ambulatory Surgical	59	2957	211	55	3168	129	6579	0.9%	44.9%	3.2%	0.8%	48.2%	2.0%	100.0%	4.1%
Surgical Eye Center	46	1273	28	522	29	1898	1898	2.4%	67.1%	1.5%	27.5%	0.0%	1.5%	100.0%	3.9%
Greenboro Specialty Surgical Center	32	2824	172	1454	1090	92	5664	0.6%	49.9%	3.0%	25.7%	19.2%	1.6%	100.0%	3.6%
The Surgical Center of Morehead City	40	2136	110	1530	519	4335	4335	0.9%	49.3%	2.5%	35.3%	0.0%	12.0%	100.0%	3.5%
Surgery Center of Morganton Eye Physicians	41	2397	54	402	2884	0	2884	1.4%	82.8%	1.9%	13.9%	0.0%	0.0%	100.0%	3.3%
Seneca Kirby Hawk Ambulatory Surgery Center	16	680	22	485	17	1220	1220	1.3%	55.7%	1.8%	39.8%	0.0%	1.4%	100.0%	3.1%
The Eye Surgery Center of the Carolinas	51	6701	225	9	1777	101	8884	0.6%	75.6%	2.5%	0.1%	20.0%	1.1%	100.0%	3.1%
Eye Surgery Center of Shelby	20	1069	83	11	1844	662	1784	0.0%	59.9%	3.0%	0.0%	0.0%	37.1%	100.0%	3.0%
Mathews Surgery Center	57	4628	97	1246	180	6208	7454	0.9%	74.5%	1.6%	20.1%	0.0%	2.9%	100.0%	2.8%
Graystone Eye Surgery Center	3	64	4	395	13	5	484	0.6%	13.2%	0.8%	81.6%	2.7%	1.0%	100.0%	2.5%
Pioneer Ambulatory Surgery Center	5	332	7	1388	9	70	1811	0.3%	18.3%	0.4%	76.6%	0.5%	3.9%	100.0%	0.7%
Carolina Surgery Specialty Center	22	795	2895	469	4181	0.5%	19.0%	0.0%	69.2%	0.0%	11.2%	0.0%	0.3%	100.0%	0.5%
Raleigh Orthopaedic Surgery Center	24	8644	5	6971	30	9374	0.3%	28.2%	0.1%	71.2%	0.0%	0.0%	0.3%	100.0%	0.3%
Raleigh Endoscopy Center	3235	89351	19391	42580	55775	10144	220776	1.5%	49.4%	8.9%	19.3%	25.3%	4.6%	100.0%	10.3%

Sort By Medicaid

	Self Pay/ Indigent/ Charity	Medicare & Medicaid Managed Care	Medicaid	Commercial Insurance	Managed Care	Other	Total	Self Pay/ Indigent/ Charity	Medicare & Medicaid Managed Care	Medicaid	Commercial Insurance	Managed Care	Other	Total	Self Pay + Medicaid
Wilson OIV/GVN			38	45	10		93	0.0%	0.0%	40.9%	48.4%	10.8%	0.0%	100.0%	40.9%
Piedmont Outpatient Surgery Center	40	254	848	1370		2	2514	1.6%	10.1%	33.7%	54.5%	0.0%	0.1%	100.0%	35.3%
Vivianwood Outpatient Surgery Center	22	1346	1251	1801		215	4667	0.5%	29.0%	27.1%	38.8%	0.0%	4.6%	100.0%	27.6%
Iredell Head Neck and Ear Ambulatory	8	384	305	435		148	1281	0.6%	30.0%	23.9%	34.0%	0.0%	11.6%	100.0%	24.5%
The Surgery Center at Southeastern Health Park	34	1812	739	800	187	2	3354	1.0%	48.1%	22.0%	23.9%	5.0%	0.1%	100.0%	23.0%
Carolina Specialty Surgery	19	2155	632	21	941	97	3866	0.5%	55.9%	16.3%	0.5%	24.3%	2.5%	100.0%	16.8%
SurgCenter of Eastern Carolina	142	4708	1835	30	5204	475	11794	1.2%	34.6%	15.6%	0.3%	44.1%	4.0%	100.0%	18.8%
High Point Surgery Center	31	1500	615	19	1929	117	4211	0.7%	35.6%	14.6%	0.5%	45.8%	2.8%	100.0%	15.3%
Blue Ridge Surgery Center	96	2158	1284	12	5122	284	8966	1.1%	24.1%	14.4%	0.1%	57.1%	3.2%	100.0%	15.9%
Fayetteville Amburg Center	68	4924	1845	9	5713	393	12952	0.5%	38.0%	14.2%	0.1%	44.1%	3.0%	100.0%	14.8%
Eye Surgery and Laser Clinic	343	1238	457	52	552	654	3304	10.4%	37.4%	13.8%	1.6%	16.7%	20.1%	100.0%	24.2%
Surgery Center of Pinehurst	48	2992	1008	601	2648	7297	11002	0.7%	41.0%	13.8%	8.2%	36.3%	0.0%	100.0%	14.5%
Union West Surgery Center	26	1148	359	47	1146	18	2244	0.9%	41.8%	13.1%	1.7%	41.8%	0.7%	100.0%	14.0%
Gateway Surgery Center	78	3200	1405	5545	882	80	11002	0.7%	29.1%	12.8%	50.4%	8.2%	0.8%	100.0%	13.5%
Clarendon Ambulatory Services	10	1398	432	1838	8	10	3716	0.3%	37.0%	12.2%	49.5%	0.2%	0.3%	100.0%	12.4%
Eastern Regional Surgical Center	20	1279	208	805	80	53	2481	0.8%	51.4%	10.0%	32.4%	3.2%	2.1%	100.0%	10.8%
South Park Surgery Center	29	4695	1018	83	4828	263	10917	0.3%	43.0%	9.3%	0.8%	44.2%	2.4%	100.0%	9.6%
Surgical Center of Greensboro	287	6378	1279	16	6103	840	14881	1.8%	42.8%	8.6%	0.1%	41.0%	6.6%	100.0%	10.4%
Wilmington SurgCare	96	4679	751	68	2825	622	9041	1.1%	51.8%	8.3%	0.8%	31.2%	6.9%	100.0%	9.4%
Piedmont Surgical Center	31	111	47	395	0	0	584	5.3%	19.0%	8.0%	67.6%	0.0%	0.0%	100.0%	6.7%
Malheur Creek Surgery Center	174	275	179	197	1238	249	2313	7.5%	11.9%	7.7%	8.5%	53.5%	10.8%	100.0%	15.3%
Premier Surgery Center of Orthopaedic Surgery Center of Asheville	5	1120	157	58	381	1	3092	3.1%	0.0%	6.3%	6.3%	50.0%	6.3%	100.0%	37.5%
Capital City Surgery Center	5	2419	427	5275		332	8510	0.2%	36.2%	5.1%	1.9%	12.3%	44.3%	100.0%	5.7%
Novant Health Huntersville Outpatient Surgery	10	1076	111	10	898	47	2261	0.8%	47.6%	4.9%	0.4%	44.1%	2.1%	100.0%	5.7%
Rea Surgery Center	95	245	235	3818		746	4684	1.9%	15.2%	4.8%	78.0%	0.0%	0.0%	100.0%	6.8%
Charlotte Surgery Center	89	2357	444	38	8078		9332	1.0%	31.9%	4.7%	0.4%	54.3%	8.0%	100.0%	5.7%
Triangle Orthopaedics Surgery Center	55	263	95	1481	15	331	2281	2.4%	12.5%	4.2%	65.5%	0.7%	14.6%	100.0%	6.7%
Iredell Surgical Center	2	805	50	130		199	1187	0.2%	67.9%	4.2%	11.0%	0.0%	16.8%	100.0%	4.4%
Novant Health Ballantyne Outpatient Surgery	293	757	87	17	1219	42	2415	12.1%	3.1%	3.6%	0.7%	50.5%	1.7%	100.0%	15.7%
James E. Davis Ambulatory Surgical	59	2957	211	55	3168	129	6579	0.9%	44.9%	3.2%	0.8%	48.2%	2.0%	100.0%	4.1%
Greensboro Specialty Surgical Center	32	2824	172	1454	1090	92	5664	0.6%	40.9%	3.0%	25.7%	19.2%	1.6%	100.0%	3.6%
Eye Surgery Center of Shelby		1069	53			662	1784	0.0%	59.5%	3.0%	0.0%	0.0%	37.1%	100.0%	3.0%
The Eye Surgery Center of the Carolinas	51	6701	225	9	1777	101	8864	0.6%	75.6%	2.5%	0.1%	20.0%	1.1%	100.0%	3.1%
The Surgical Center of Morehead City	40	2138	110	1530		519	4335	0.9%	49.3%	2.5%	35.3%	0.0%	12.0%	100.0%	3.5%
Ashville Eye Surgery2397y Center	409	3864	118	125	978	6	5500	7.4%	70.3%	2.1%	2.3%	17.8%	0.1%	100.0%	9.6%
Mathews Surgery Center	20	607	58	11	1844	224	2764	0.7%	22.0%	2.1%	0.4%	66.7%	8.1%	100.0%	2.8%
Surgery Center of Morganton Eye Physicians	41	2397	54	402		2884		1.4%	82.8%	1.9%	13.9%	0.0%	0.0%	100.0%	3.3%
Seneca Kiny Hawk Ambulatory Surgery Center	16	680	22	485	17	1220	2220	1.3%	55.7%	1.6%	39.8%	0.0%	1.4%	100.0%	3.1%
Greystone Eye Surgery Center	57	4628	97	1246	160	6208		0.9%	74.5%	1.6%	20.1%	0.0%	2.8%	100.0%	2.5%
Surgical Eye Center	46	1273	28	522		29	1898	2.4%	67.1%	1.5%	27.5%	0.0%	1.5%	100.0%	3.9%
Pioneer Ambulatory Surgery Center	3	64	4	395	13	5	484	0.6%	13.2%	0.6%	81.6%	2.7%	1.0%	100.0%	1.4%
Carolus Surgery Specialty Center	5	332	7	1388	9	70	1811	0.3%	18.3%	0.4%	76.6%	0.5%	3.9%	100.0%	0.7%
Raleigh Plastic Surgery Center, Inc.	39	88	1	375		501		7.8%	17.2%	0.2%	74.9%	0.0%	0.0%	100.0%	8.0%
Raleigh Endoscopy Center	24	2844	5	6971		30	9374	0.3%	28.2%	0.1%	71.2%	0.0%	0.3%	100.0%	0.3%
Plastic Surgery Center of North Carolina	169	0	0	0	0	0	169	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%	100.0%
Raleigh Orthopaedic Surgery Center	22	795	1931	2895	55775	469	4181	0.5%	19.0%	0.0%	69.2%	0.0%	11.2%	100.0%	0.5%
Total	3235	89051	19391	42580	55775	10144	220176	1.5%	40.4%	8.8%	19.3%	25.3%	4.6%	100.0%	10.3%

Sort By Self Pay

Facility Name	Self Pay/ Indigent/ Charity	Medicare & Managed Care	Medicaid	Commercial Insurance	Managed Care	Other	Total	Self Pay/ Indigent/ Charity	Medicare & Managed Care	Medicaid	Commercial Insurance	Managed Care	Other	Total	Self Pay + Medicaid
Plastic Surgery Center of North Carolina	169	0	0	0	0	0	169	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%	100.0%
Prentiss Surgery Center	5	1	1	1	8	1	16	31.3%	0.0%	6.3%	6.3%	50.0%	6.3%	100.0%	37.5%
Recent Health Balance Outpatient Surgery	293	757	87	17	1219	42	2415	12.1%	31.3%	3.6%	0.7%	50.5%	1.7%	100.0%	15.7%
Eye Surgery and Laser Clinic	343	1235	457	52	552	654	3304	10.4%	37.4%	13.8%	1.6%	16.7%	20.1%	100.0%	24.2%
Raleigh Plastic Surgery Center, Inc.	39	86	1	375			501	7.6%	17.2%	0.2%	74.9%	0.0%	0.0%	100.0%	8.0%
Midland Creek Surgery Center	174	276	179	197	1238	249	2313	7.5%	11.9%	7.7%	8.5%	53.5%	10.8%	100.0%	15.3%
Asheville Eye Surgery Center	409	3884	118	125	978	6	5500	7.4%	70.3%	2.1%	2.3%	17.8%	0.1%	100.0%	9.6%
Piedmont Surgical Center	31	111	47	395	0	0	584	5.3%	19.0%	8.0%	67.6%	0.0%	0.0%	100.0%	6.7%
Triangle Orthopaedic Surgery Center	55	283	96	1481	15	331	2281	2.4%	12.5%	4.2%	65.5%	0.7%	14.5%	100.0%	6.7%
Surgical Eye Center	46	1213	28	522		29	1698	2.4%	67.7%	1.5%	27.5%	0.0%	1.5%	100.0%	3.9%
Red Surgery Center	95	745	236	3819			4894	1.9%	15.2%	4.8%	78.0%	0.0%	0.0%	100.0%	6.8%
Surgical Center of Greensboro	257	6376	1279	16	6103	840	14891	1.8%	42.8%	8.6%	0.1%	41.0%	5.6%	100.0%	10.4%
Piedmont Outpatient Surgery Center	40	254	848	1370		2	2514	1.6%	10.1%	33.7%	54.5%	0.0%	0.1%	100.0%	35.3%
Surgery Center of Morganton Eye Physicians	41	2397	54	402			2894	1.4%	82.8%	1.9%	13.9%	0.0%	0.0%	100.0%	3.3%
Serrano Eye Hawk Ambulatory Surgery Center	16	680	22	485		17	1220	1.3%	55.7%	1.8%	39.8%	0.0%	1.4%	100.0%	3.1%
SurgCenter of Eastern Carolina	142	4108	1835	30	5304	475	11794	1.2%	34.9%	15.6%	0.3%	44.1%	4.0%	100.0%	18.8%
Blue Ridge Surgery Center	96	2158	1294	12	5122	284	8866	1.1%	24.1%	14.4%	0.1%	57.1%	3.2%	100.0%	15.5%
Wilmington Surgicare	95	4679	751	68	2825	622	9041	1.1%	51.8%	8.3%	0.8%	31.2%	6.9%	100.0%	9.4%
The Surgery Center at Southeastern Health Park	34	1612	739	800	167	2	3354	1.0%	48.1%	22.0%	23.9%	5.0%	0.1%	100.0%	23.0%
Charlotte Surgery Center	89	2957	444	38	5078	746	9352	1.0%	31.6%	4.7%	0.4%	54.3%	8.0%	100.0%	5.7%
Union West Surgery Center	26	1148	359	47	1146	18	2744	0.9%	41.8%	13.1%	1.7%	41.8%	0.7%	100.0%	14.0%
The Surgical Center of Monhead City	40	2136	110	1530		519	4335	0.9%	48.3%	2.5%	35.3%	0.0%	12.0%	100.0%	3.5%
Graysons Eye Surgery Center	57	4628	97	1246		180	6208	0.9%	74.5%	1.6%	20.1%	0.0%	2.5%	100.0%	2.5%
James E. Davis Ambulatory Surgical Outpatient Surgery	59	2957	211	55	3168	129	6579	0.9%	44.9%	3.2%	0.8%	48.2%	2.0%	100.0%	4.1%
Novent Health Hendersonville	19	1075	111	10	998	47	2261	0.8%	47.6%	4.9%	0.4%	44.1%	2.1%	100.0%	5.7%
Eastern Regional Surgical Center	20	1275	248	805	80	53	2481	0.8%	51.4%	10.0%	3.2%	3.2%	2.1%	100.0%	10.8%
High Point Surgery Center	31	1500	615	19	1829	117	4211	0.7%	35.6%	14.6%	0.5%	45.8%	2.5%	100.0%	15.3%
Matthews Surgery Center	78	607	58	11	1844	224	2764	0.7%	22.0%	2.1%	0.4%	66.7%	8.1%	100.0%	2.8%
Gateway Surgery Center	20	3200	1406	5545	683	90	11002	0.7%	29.1%	12.8%	50.4%	6.2%	0.8%	100.0%	13.5%
Capital City Surgery Center	57	2419	427	5275		332	8510	0.7%	28.4%	5.0%	62.0%	0.0%	3.9%	100.0%	5.7%
Surgery Center of Pinhurst	48	2992	1098	601	2848		7297	0.7%	41.0%	13.8%	8.2%	36.3%	0.0%	100.0%	14.5%
Jredell Head Neck and Ear Ambulatory	8	384	306	435		148	1281	0.6%	30.0%	23.9%	34.0%	0.0%	11.6%	100.0%	24.5%
Pleasant Ambulatory Surgery Center The Eye Surgery Center of the Carolinas	3	64	4	395	13	5	484	0.6%	13.2%	0.9%	81.6%	2.7%	1.0%	100.0%	1.4%
Carollinas	51	6701	225	9	1777	101	8864	0.6%	75.6%	2.5%	0.1%	20.0%	1.1%	100.0%	3.1%
Greensboro Specialty Surgical Center	32	2824	172	1454	1090	92	5664	0.6%	49.9%	3.0%	25.7%	19.2%	1.6%	100.0%	3.6%
Raleigh Orthopaedic Surgery Center	22	795	1845	2895		469	4181	0.5%	19.0%	0.0%	69.2%	0.0%	11.2%	100.0%	0.5%
Fayetteville Ambulatory Surgery Center	68	4924	1845	9	5713	393	12952	0.5%	38.0%	14.2%	0.1%	44.1%	3.6%	100.0%	14.9%
Carrollton Specialty Surgery	19	2158	632	21	941	97	3665	0.5%	55.8%	16.3%	0.5%	24.3%	2.5%	100.0%	16.8%
Vernmont Surgery Center	22	1348	1261	1801		215	4817	0.5%	29.0%	27.1%	38.9%	0.0%	4.6%	100.0%	27.5%
Carolinas Surgery Specialty Center	5	332	7	1388	9	70	1811	0.3%	18.3%	0.4%	76.6%	0.5%	3.9%	100.0%	0.7%
Cleveland Ambulatory Services	10	1398	452	1838	8	10	3716	0.3%	37.6%	12.2%	48.5%	0.2%	0.3%	100.0%	12.4%
South Park Surgery Center	29	4896	1018	83	4828	263	10917	0.3%	43.0%	9.3%	44.2%	2.4%	100.0%	9.6%	
Raleigh Endoscopy Center	24	2644	24	6671	30	30	9374	0.3%	28.2%	0.1%	71.2%	0.0%	0.3%	100.0%	0.3%
Jredell Surgical Center	2	806	50	130		199	1187	0.2%	67.9%	4.2%	11.0%	0.0%	16.8%	100.0%	4.4%
Orthopaedic Surgery Center of Asheville	5	1120	157	58	381	1371	3092	0.2%	36.2%	5.1%	1.9%	12.3%	44.3%	100.0%	40.9%
Willson OBGYN		1093	38	45	10		93	0.2%	0.0%	40.9%	48.4%	10.8%	0.0%	100.0%	40.9%
Eye Surgery Center of Shelby		24604	53	6592		692	1724	0.0%	59.9%	3.0%	0.0%	0.0%	37.1%	100.0%	3.0%
Total	2261	24604	6592	9298	20439	2940	66124	3.4%	37.2%	10.0%	14.1%	30.9%	4.4%	100.0%	13.4%