



August 10, 2017

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

Attn: NC State Health Coordinating Council

Dear Dr. Ullrich and Members of the Council:

Thank you for the opportunity to provide comments on petitions and comments submitted to the State Health Coordinating Council. NCHA provides the following comments pertaining to the Technology and Equipment petitions to the Proposed 2018 State Medical Facilities Plan.

Caldwell Memorial Hospital requests an adjusted need determination for one unit of fixed Cardiac Catheterization equipment to serve Caldwell County.

Caldwell Memorial Hospital has been providing cardiac catheterization services since 1990, but does not currently own cardiac catheterization equipment. In order for Caldwell Memorial to obtain its own equipment, it is seeking an adjusted need determination, which, if approvals are granted, will enable it to purchase one fixed cardiac catheterization lab. Caldwell Memorial reports that ownership would enable it to upgrade to equipment with lower radiation dosage and higher accuracy, while increasing efficiencies through staffing flexibilities. Caldwell Memorial projects annual savings through ownership of \$500,000. Its petition notes that cardiologists at the hospital would also prefer the consistency available in having a (non-rotating) team assigned to the cath lab.

Caldwell Memorial's cardiac catheterization service provides both diagnostic and interventional (Percutaneous Coronary Intervention) procedures, and has shown significant growth from 2015 to 2016. The PCI procedure volume at Caldwell Memorial is compatible with guidelines issued by the *American College of Cardiology Foundation/American Heart Association/ Society for Cardiovascular Angiography and Interventions* as published in the "ACCF/AHA/SCAI 2013 Update of the Clinical Competence Statement on Coronary Artery Interventional Procedures." NCHA supports the Caldwell Memorial Hospital petition.

Thank you for the opportunity to comment on these petitions. Please feel free to contact me at 919.677.4233 if you have questions.

Sincerely,

Mike Vicario
Vice-President of Regulatory Affairs