

Sandra Greene, PhD  
Chair, Acute Care Services Committee  
State Health Coordinating Council

Amy Craddock, PhD  
Assistant Chief, Healthcare Planning  
Healthcare Planning and Certificate of Need Section  
NC Division of Health Service Regulation  
2704 Mail Service Center  
Raleigh, NC, 27699

**Re: Comments on Chapter 6, Operating Room Methodology for 2019 State Medical Facilities Plan**

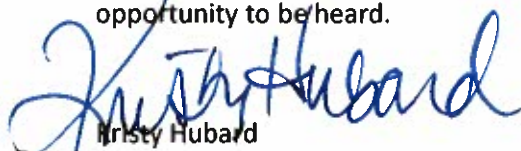
Dear Dr. Greene and Dr. Craddock,

On behalf of New Hanover Regional Medical Center, we appreciate the opportunity to respond to comments submitted by PDA, Inc. and Mission Health System, Inc. regarding the operating room methodology in Chapter 6 of the *2019 State Medical Facilities Plan*. We appreciate the diligence and work the State Health Coordinating Council members and staff put into the revised OR methodology, and the fact that this process was carefully planned, with opportunity for public comment and other feedback.

The PDA and Mission comments seek to revisit the OR methodology. The appropriate time to revisit the OR methodology is in the early months of 2019 in accordance with the petitioning deadlines set forth in the SMFP. The SHCC put in a great deal of effort to gather consensus around the revised OR methodology, and without the benefit of data, we believe that now is not the time to consider amending the revised methodology. In fact, regarding the minimum and maximum number of ORs, the 2018 SMFP states that “[t]hese changes will be evaluated *after* the first year of implementation of the new methodology.” 2018 SMFP, Chapter 6, page 55 (emphasis added). The first year of implementation of the new methodology is in process, so it is premature to make changes now.

We are open to having a discussion on the merits at the appropriate time but respectfully submit that the OR needs in the Draft 2019 SMFP should not be changed. None of the submitted comments provide any data upon which the SHCC could appropriately base a change to a brand-new methodology.

Again, we appreciate the work the SHCC membership and staff have done to attempt to ensure a fair and equitable distribution of medical resources to benefit patients in this state. Thank you for the opportunity to be heard.



Kristy Hubbard  
Vice President, Strategic Services