



August 7, 2018

Ms. Valerie Jarvis, Chair, Long-Term and Behavioral Health Committee
Dr. Christopher Ullrich, Chairman
North Carolina State Health Coordinating Council
809 Ruggles Drive
Raleigh, NC 27603

Re: Wake Forest Baptist Health (WFBH) Petition for Adjusted Need Determination for 15 Nursing Facility Beds in Davidson County

Dear Ms. Jarvis and Dr. Ullrich,

I am writing to express my support for the petition filed by WFBH for an adjusted need determination for 15 nursing facility beds in Davidson County. If approved, these additional beds will ensure that patients have access to high-quality post-acute services close to home.

As the CHESS ACO¹ Chief Medical Operations Officer, I can attest to the current and projected needs our patients have for post-acute care services. CHESS is committed to the bipartisan goal of transitioning our healthcare system from Fee-for-Service to Value-based care. Our mission is to create a healthcare experience consistent with the Triple Aim, one patient at a time. Concerning post-acute care, I support the growth of high-quality nursing facility beds in Davidson County. Patients deserve high-quality care delivered close to home, outside of the hospital. This initiative will promote healthier outcomes for patients and their families.

As demonstrated in its petition, WFBH believes that 15 additional nursing facility beds will support the needs of its "difficult to place" patients that remain in acute care beds as a result of their medical complexity and/or their insurance status, although they meet the CMS clinical eligibility requirements for a skilled nursing facility ("SNF"). In addition, WFBH believes these additional nursing facility beds will provide necessary incremental access to meet the needs of its population health and CHESS ACO patients, which require facilities to have a three-star or greater rating to comply with the SNF three-day rule waiver.

I encourage the State Health Coordinating Council to approve this petition for 15 nursing facility beds in Davidson County. Approval of this petition will enhance access by creating capacity for "difficult to place," underserved patients within the WFBH population health/CHESS ACO. Approval will lead to improved quality by providing optimal care in a facility that focuses on improving the patients' functional capacity. This facility will also enhance healthcare value as SNF care is a fraction of the cost of the same care in a hospital.

Thank you for your thoughtful consideration.

Respectfully,

Karen S. Cannon, MD, CPE
Chief Medical Operations Officer

¹ CHESS = Cornerstone Health Enablement Strategic Solutions; ACO = Accountable Care Organization



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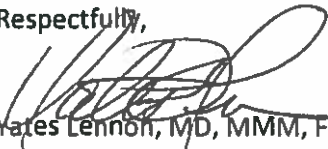
As the CHESS ACO Chief Transformation Officer, I can attest to the current and projected needs our patients have for post-acute care services. Adequate access to high quality post-acute care facilities is critical to the success of the ACO in its efforts to provide the right care to the right patient in the right setting. The ACO also works closely with CMMI in its multiple innovation projects and in these initiatives access to high quality post-acute care is written into the regulations.

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Thank you for your thoughtful consideration.

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Yates Lennon, MD, MMM, FACOG
Chief Transformation Officer