

August 8, 2019

Ms. Valerie Jarvis, Chair Long Term and Behavioral Health Committee  
North Carolina State Health Coordinating Council  
c/o NC Division of Health Service Regulation  
Healthcare Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, NC 27699-2704  
[DHSR.SMFP.Petitions-Comments@dhhs.nc.gov](mailto:DHSR.SMFP.Petitions-Comments@dhhs.nc.gov)

Re: Support Petition for Need Determination for Substance Use Disorder Treatment Beds

Dear Ms. Jarvis and Members of the Committee:

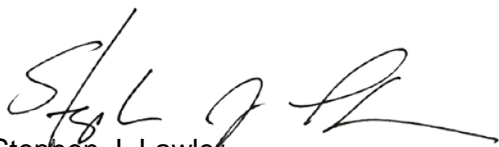
NCHA represents 130 hospitals and health systems in North Carolina, and we thank you for the opportunity to comment on the Petition received by the State Health Coordinating Council from Addiction Recovery Care Association, Inc. ("ARCA"). ARCA has submitted a written petition requesting an adjustment to the need determination given in the North Carolina Proposed State Medical Facilities Plan.

ARCA represents an existing CARF-Accredited residential treatment facility in Forsyth County. The petition describes escalating death rates from overdose, as well as high occupancy and deferral rates in its existing residential treatment facility, as support for the establishment of a need determination for an additional 32 beds in the 2020 State Medical Facilities Plan.

ARCA states that it serves all patients regardless of their ability to pay, including many patients that are uninsured. NCHA believes that access to substance abuse services for medically underserved patients is critically important, as is ARCA's commitment to programs such as Medication Assisted Treatment for Opioid Addiction, the District Attorney's Treatment Alternatives (DATA) Jail Diversion Pilot Program and Emergency Department Pilot Diversion. ARCA's dedication to other follow-up services including outpatient care, family therapy, and education also represent important components to meeting the needs of patients and the community as a whole, and NCHA supports the ARCA petition.

Thank you for your consideration of our comments. Please contact Mike Vicario ([mvicario@ncha.org](mailto:mvicario@ncha.org)) or me if you have questions or concerns.

Sincerely,



Stephen J. Lawler  
President  
North Carolina Healthcare Association

Cc: Christopher Ullrich M.D., SHCC Chair

