



CaroMont Health
Trauma Services

August 4, 2016

Ms. Nadine Pfeiffer
Division of Health Service Regulation
2701 Mail Service Center
Raleigh, NC 27699-2701

Dear Ms. Pfeiffer:

In consideration of the decision to proceed with changes in the North Carolina rules governing state designation of trauma centers, I have a specific concern. As the Trauma Medical Director of a current level III state designated trauma center, the decision to adopt the American College of Surgeons rules for verification of trauma centers as outlined in the manual "Resources for Optimal Care of the Injured Patient", hereby known as 'The Orange Book', creates significant potential hardship for the continued compliance of maintenance of designation. I believe it is imperative that the North Carolina Committee on Trauma Medical Directors provide leadership, consent and advice for the continued designation of Level III trauma centers.

During the designation process, medical directors should have appropriate discretion to interpret the intent of the rules, if not the exact letter of the rule. This is the best way for the identified experts within our state to continue to allocate the resources necessary to provide sufficient care to all of the residents and visitors of North Carolina. This discretionary function will remain part of the designation process. Proper recommendations will be made to the site based upon this interpretation. The Committee on Trauma Medical Directors will then make appropriate recommendations for designation to the state. This function of the Medical Directors of the North Carolina Committee on Trauma has always been taken very seriously. We should not cede it. I believe this is the best way to maintain the highest standards and exceptional care offered through the coordinated North Carolina Trauma System. Thank you for considering these concerns.

Respectfully submitted,

Anthony Raspanti M.D., FACS
Trauma Medical Director
Caromont Regional Medical Center