



January 27, 2021

Presbyterian Medical Center

200 Hawthorne Lane  
Charlotte, NC 28204

Dear Sirs,

Novant Health supports the proposed rule changes noted in the “Emergency Medical Services and Trauma Rules” section 10ANCAC13P .0904 “Initial Designation Process”, and supports removing the 1200 admission requirements for hospitals seeking Level II state designation for the following reasons:

- Current requirement of 1200 admissions for Level II Designation is preventing hospitals from seeking Level II Trauma Designation, and impeding their ability to serve their community and population growth.
- Would align the North Carolina state trauma designation requirements with the evidence-based American College of Surgeons (ACS) trauma verification requirements.
- Supports our North Carolina statewide Trauma System development.
- Supports the Right person, Right place Right time philosophy (*ACS 2014 Resources for Optimal Care of the Injured Patient. Pg 24*)
- There is no evidence-based research indicating that imposing a 1200 admission requirement for Level II Trauma Centers assists with determining the number of trauma centers that should be available in a given area or state.
- Level II Trauma Center Criteria is clearly stated in the ACS “Resources for the Optimal Care of the Injured Patient” alleviating any concerns about what the requirements are for becoming a Level II Trauma Center (See *ACS 2014 Resources for Optimal Care of the Injured Patient. Chp 23*)

Recommendations:

- *Remove the 1200 admission requirement for Level II Trauma Center state designation.*

*There may be recommendations to await the release of the new Resources for the Optimal Care of the Injured Patient, however, the ACS has already confirmed that there are no anticipated changes in regards to volume requirements for Level II Trauma Centers.*

Novant Health’s goal is to have the ability to provide care options that are consistent across the state of North Carolina for the populations we serve. Sincerely,

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Dee LaDuke, RN BSN

Novant Health Presbyterian Medical Center

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Resources:

Winchell, R., Stewart, R., Price, M. *Committee on Trauma Introduces Needs Assessment Tool Aimed at Resolving Trauma Center Debate*. 2016.

<https://bulletin.facs.org/2016/09/committee-trauma-introduces-needs-assessment-tool-aimed-resolving-trauma-center-debate/> <https://lern.la.gov/wp-content/uploads/Appendix-I-acs-nbats-tool.pdf>

*Resources for optimal care of the injured patient*. (2014). Chicago, IL: American College of Surgeons, Committee on Trauma.