



November 12, 2008

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WV HEALTH CARE
AUTHORITY

Dayle D. Stepp, Director
Certificate of Need
West Virginia Health Care Authority
100 Dee Drive, Suite 201
Charleston, WV 25311

Re: Lithotripsy Standards

Dear Mr. Stepp:

On behalf of Raleigh General Hospital, this letter provides comments on certificate of need review for lithotripsy services. These comments relate to the meetings held by the Health Care Authority on September 18, 2008 and October 15, 2008 to discuss whether lithotripsy services should continue to be subject to certificate of need ("CON") review. Raleigh General Hospital supports the continuation of CON review for lithotripsy services.

The market in West Virginia is saturated. With the possible exception of limited additional sites for shared mobile lithotripsy services, there is no need for additional lithotripsy services. This saturation can be seen in the relatively flat utilization over the past several years in the information distributed by the Health Care Authority. Similar to other providers, lithotripsy services at Raleigh General Hospital have remained relatively unchanged over the past several years.

Removing CON to foster competition is not applicable for lithotripsy services. A certain volume is required for viable lithotripsy services. The total number of urologists, who perform these procedures, is low in West Virginia. Removal of CON could to allow additional sites without taking unmet need and existing services into account would affect the viability of existing services. Ultimately, there would be no improvement in access.

I would be happy to respond to any questions. Thank you for the opportunity to comment on this important matter.

Sincerely,

A handwritten signature in blue ink that reads 'Karen Bowling'. The signature is fluid and cursive, with a long, sweeping tail that extends to the right.

Karen Bowling, President/CEO
Raleigh General Hospital