

December 4, 2019

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BY EMAIL TRANSMISSION

The Honorable Lisa Piercey, MD, MBA, FAAP
Commissioner
Tennessee Department of Health
710 James Robertson Parkway
Nashville, TN 37243

Re: Request for Physician Waiver (Pulmonologist)

Dear Commissioner Piercey,

Ballad Health ("Ballad") has identified an immediate need for one pulmonologist at Bristol Regional Medical Center ("BRMC") and two pulmonologists at Johnston Memorial Hospital ("JMH") and is requesting a waiver under Section 5.05(e) of the Terms of Certification. In Ballad's Northeast market, there is currently a severe deficit of pulmonologists for initial patient evaluations and follow-up services for pulmonary disease in outpatient clinic settings. Both BRMC and JMH have robust inpatient pulmonary service lines, but clinic follow-ups are often delayed due to lack of access to outpatient pulmonology clinics.

BRMC has been recognized as having an exceptional pulmonary service line. However, the outpatient pulmonary clinics at BRMC are at capacity, and new outpatient visits must be scheduled out several months. This delay in time-to-first appointment results in patients establishing with another pulmonologist outside of their area due to necessity. If BRMC were able to recruit an additional pulmonologist, it would increase accessibility to outpatient care in its primary service area by decreasing wait times for appointments.

JMH currently has two employed critical care pulmonologists that provide intensivist coverage for the ICU at JMH. Those physicians only provide very limited outpatient clinic (one day per week) for patients diagnosed with lung nodules. The only outpatient pulmonary clinic in Abingdon, Virginia is offered by Dr. Emory Robinette, who is retiring in the summer of 2020. Upon his retirement, outpatient pulmonary care will no longer be available in Abingdon. The pulmonary patients in Abingdon will likely have to travel out of the market to receive pulmonology services due to the limited provider availability in the Northeast market. With the recruitment of two additional pulmonologists, JMH will be able to maintain Dr. Robinette's current patient load and create additional outpatient pulmonary clinic slots.

Although the most recent Provider Needs Assessment for the Northeast Stark Region PYA Report identified a surplus of 0.7 FTE surplus of pulmonologists in 2018, such assessment does not

adequately analyze sub-specialties. Once sub-specialties are appropriately analyzed, there is a deficit of outpatient care pulmonologists in the market. Based on the latest strategic data, there is a current shortage of 1.0 FTE pulmonary physicians in the JMH market (which is projected to increase to a shortage of 2.0 FTE upon Dr. Robinette's retirement) and a shortage of 1.65 pulmonary physicians in the BRMC market (which will increase to 2.25 FTE by 2020).

The 2016 Rural Health Report identified Washington County, Virginia as one of the counties with the highest risk for persistent recruiting challenges according to the 2016 Virginia Needs Assessment. This assessment also identified the catchment areas of Russell, Buchanan and Tazewell for Bristol Regional Medical Center and Johnston Memorial Hospital as a high priority target area for pulmonary disease. In order to recruit physicians in this highly specialized field, an employment model will be necessary to attract potential candidates. The only alternative to the employment model would be to hire a locums firm in order to provide pulmonary coverage which would be extremely expensive at an estimated cost of \$3800/day just for routine outpatient coverage.

Due to these factors, Ballard is respectfully requesting a waiver under Section 5.05(e) of the Terms of Certification that would allow BRMC to recruit one pulmonologist and JMH to recruit two pulmonologists. We appreciate your consideration of this request. Please let us know if you need any additional information.

Sincerely,



Alan Levine

cc: Herbert H. Slatery III
Tennessee Attorney General

Janet M. Kleinfelter
Deputy Attorney General

Jeff Ockerman, Director, Division of Health Planning
Tennessee Department of Health

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Tennessee COPA Monitor

M. Norman Oliver, MD, MA, Commissioner
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Virginia Department of Health