

Burgos, Alexander N

Subject: FW: Technical changes - Temporary rules - 10A NCAC 14C

From: Pfeiffer, Nadine <nadine.pfeiffer@dhhs.nc.gov>

Sent: Tuesday, January 17, 2023 11:39 AM

To: Ascher, Seth M <seth.ascher@oah.nc.gov>

Cc: Burgos, Alexander N <alexander.burgos@oah.nc.gov>; Mitchell, Micheala L <Micheala.Mitchell@dhhs.nc.gov>; Burgon, Bethany A <bburgon@ncdoj.gov>; Premakumar, Rajeev K <raj.premakumar@dhhs.nc.gov>; Hunter, Derek L <dhunter@ncdoj.gov>; Cronin, Julie <Julie.Cronin@dhhs.nc.gov>; Payne, Mark <mark.payne@dhhs.nc.gov>; Milliken, Emery <emery.milliken@dhhs.nc.gov>

Subject: RE: Technical changes - Temporary rules - 10A NCAC 14C

Thank you. We will follow up with you on who may be speaking at the meeting on the agency's behalf.

Nadine Pfeiffer

Rules Review Manager

Division of Health Service Regulation

[NC Department of Health and Human Services](#)

Office: 919-855-3811

Fax: 919-733-2757

nadine.pfeiffer@dhhs.nc.gov

809 Ruggles Drive, Edgerton Building

2701 Mail Service Center

Raleigh, NC 27699-2701

Burgos, Alexander N

From: Ascher, Seth M
Sent: Tuesday, January 17, 2023 10:52 AM
To: Pfeiffer, Nadine
Cc: Burgos, Alexander N; Mitchell, Micheala L; Burgon, Bethany A; Premakumar, Rajeev K; Hunter, Derek L; Cronin, Julie; Payne, Mark; Milliken, Emery
Subject: RE: Technical changes - Temporary rules - 10A NCAC 14C
Attachments: Staff Opinion Temp Rules 10A NCAC 14C-January 2023.pdf; GS_150B-21.1.pdf; GS_143B-10.pdf; GS_131E-177.pdf; GS_131E-183.pdf; Directive II-24 11-08.pdf

Nadine,

Attached is my staff opinion on these rules and the relevant attachments.

Please let me know the names of anyone the agency intends to have speak at the meeting, so the chair knows who to call on.

Sincerely,

Seth Ascher

Counsel to the North Carolina Rules Review Commission
Office of Administrative Hearings
(984) 236-1934

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From: Pfeiffer, Nadine <nadine.pfeiffer@dhhs.nc.gov>
Sent: Friday, January 13, 2023 4:47 PM
To: Ascher, Seth M <seth.ascher@oah.nc.gov>
Cc: Burgos, Alexander N <alexander.burgos@oah.nc.gov>; Mitchell, Micheala L <Micheala.Mitchell@dhhs.nc.gov>; Burgon, Bethany A <bburgon@ncdoj.gov>; Premakumar, Rajeev K <raj.premakumar@dhhs.nc.gov>; Hunter, Derek L <dhunter@ncdoj.gov>; Cronin, Julie <Julie.Cronin@dhhs.nc.gov>; Payne, Mark <mark.payne@dhhs.nc.gov>; Milliken, Emery <emery.milliken@dhhs.nc.gov>
Subject: RE: Technical changes - Temporary rules - 10A NCAC 14C

Thank you.

Nadine Pfeiffer

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Division of Health Service Regulation
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From: Ascher, Seth M <seth.ascher@oah.nc.gov>
Sent: Friday, January 13, 2023 4:44 PM
To: Pfeiffer, Nadine <nadine.pfeiffer@dhhs.nc.gov>
Cc: Burgos, Alexander N <alexander.burgos@oah.nc.gov>; Mitchell, Micheala L <Micheala.Mitchell@dhhs.nc.gov>;
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<dhunter@ncdoj.gov>; Cronin, Julie <Julie.Cronin@dhhs.nc.gov>; Payne, Mark <mark.payne@dhhs.nc.gov>; Milliken,
Emery <emery.milliken@dhhs.nc.gov>
Subject: RE: Technical changes - Temporary rules - 10A NCAC 14C

Thank you for your timely action, Nadine.

As discussed in previous emails, I will be writing a staff opinion on the signature issue. It does not appear that there are any other issues that will need to be addressed, and I will forward the revised rule for filing.

Have a nice weekend,

Seth Ascher

Counsel to the North Carolina Rules Review Commission
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(984) 236-1934

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Emery <emery.milliken@dhhs.nc.gov>
Subject: Technical changes - Temporary rules - 10A NCAC 14C

Good Afternoon Seth,

We were notified of the technical changes on January 10, 2023 pursuant to G.S. 150B-21.10 for the following rules: 10A NCAC 14C .1403 and .2703. In preparation for the January 19, 2023 RRC meeting, attached to this email you will find the amended text for Rule 10A NCAC 14C .1403 as well as the Agency's responses to the concerns raised in the "Request for Changes" document as seen in bold black font on the document.

Should you have any questions regarding the attachment, or should you have any follow up questions or concerns, please feel free to contact me.

Thank you,

Nadine Pfeiffer

Rules Review Manager

Division of Health Service Regulation

[NC Department of Health and Human Services](#)

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Seth Ascher

Counsel to the North Carolina Rules Review Commission
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Should you have any questions regarding the attachment, or should you have any follow up questions or concerns, please feel free to contact me.

Thank you,

Nadine Pfeiffer

Rules Review Manager

Division of Health Service Regulation

[NC Department of Health and Human Services](#)

Office: 919-855-3811

Fax: 919-733-2757

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Burgos, Alexander N

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Sent: Friday, January 13, 2023 3:54 PM
To: Ascher, Seth M
Cc: Burgos, Alexander N; Mitchell, Micheala L; Burgon, Bethany A; Premakumar, Rajeev K; Hunter, Derek L; Cronin, Julie; Payne, Mark; Milliken, Emery
Subject: Technical changes - Temporary rules - 10A NCAC 14C
Attachments: 10A NCAC 14C .1403.docx; RRC Tech chg requests 14C temp responses.docx

Good Afternoon Seth,

We were notified of the technical changes on January 10, 2023 pursuant to G.S. 150B-21.10 for the following rules: 10A NCAC 14C .1403 and .2703. In preparation for the January 19, 2023 RRC meeting, attached to this email you will find the amended text for Rule 10A NCAC 14C .1403 as well as the Agency's responses to the concerns raised in the "Request for Changes" document as seen in bold black font on the document.

Should you have any questions regarding the attachment, or should you have any follow up questions or concerns, please feel free to contact me.

Thank you,

Nadine Pfeiffer
Rules Review Manager
Division of Health Service Regulation
[NC Department of Health and Human Services](#)

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Fax: 919-733-2757
nadine.pfeiffer@dhhs.nc.gov

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1 10A NCAC 14C .1403 is amended under temporary procedures with changes as follows:

2
3 **10A NCAC 14C .1403 PERFORMANCE STANDARDS**

4 (a) ~~An~~ If an applicant is proposing a project that increases the total number of neonatal beds in a facility, the applicant
5 shall demonstrate that the proposed project is capable of meeting the following standards:

- 6 (1) ~~if an applicant is proposing to increase the total number of neonatal beds (i.e., the sum of Level II,~~
7 ~~Level III [III,] and Level IV beds),~~ the overall average annual occupancy of the combined number
8 of existing Level II, Level ~~III~~ III, and Level IV beds in the facility is at least 75 percent, over the 12
9 months immediately preceding the submittal of the proposal;
- 10 (2) ~~if an applicant is proposing to increase the total number of neonatal beds (i.e., the sum of Level II,~~
11 ~~Level III [III,] and Level IV beds),~~ the projected overall average annual occupancy of the combined
12 number of Level II, Level ~~III~~ III, and Level IV beds proposed to be operated during the third year
13 of operation of the proposed project shall be at least 75 percent; and
- 14 (3) ~~The~~ the applicant shall document the assumptions and provide data supporting the methodology
15 used for each projection in this ~~rule.~~ Rule.

16 (b) If an applicant proposes to develop a new Level III or Level IV service, the applicant shall document that an unmet
17 need exists in the applicant's defined neonatal service ~~area, unless the State Medical Facilities Plan includes a need~~
18 ~~determination for neonatal beds in the service area.~~ area. The need for Level III and Level IV beds shall be computed
19 for the applicant's neonatal service area by:

- 20 (1) identifying the ~~annual~~ number of live births occurring annually at all hospitals within the proposed
21 neonatal service area, using the latest available data compiled by the State Center for Health
22 Statistics;
- 23 (2) identifying the low birth weight rate (percent of live births below 2,500 grams) for the births
24 identified in Subparagraph (1) of this Paragraph, using the latest available data compiled by the State
25 Center for Health Statistics;
- 26 (3) dividing the low birth weight rate identified in Subparagraph (2) of this Paragraph by .08 and
27 subsequently multiplying the resulting quotient by four; and
- 28 (4) determining the need for Level III and Level IV beds in the proposed neonatal service area as the
29 product of:
- 30 (A) the product derived in Subparagraph (3) of this Paragraph, and
- 31 (B) the quotient resulting from the division of the number of live births in the initial year of the
32 determination identified in Subparagraph (1) of this Paragraph by the number 1000.

33
34 *History Note:* *Authority G.S. 131E-177(1); 131E-183(b);*
35 *Temporary Adoption Eff. September 1, 1993 for a period of 180 days or until the permanent rule*
36 *becomes effective, whichever is sooner;*
37 *Eff. January 4, 1994;*

1 *Temporary Amendment Eff. March 15, 2002;*
2 *Amended Eff. April 1, 2003;*
3 *Temporary Amendment Eff. February 1, 2009;*
4 *Amended Eff. November 1, 2009;*
5 *Temporary Amendment Eff. February 1, 2010;*
6 *Amended Eff. November 1, ~~2010~~ 2010;*
7 *Temporary Amendment Eff. January 27, 2023.*

Burgos, Alexander N

Subject: FW: Health and Human Services Temporary Rules Request for Changes

From: Pfeiffer, Nadine <nadine.pfeiffer@dhhs.nc.gov>

Sent: Wednesday, January 11, 2023 8:58 AM

To: Ascher, Seth M <seth.ascher@oah.nc.gov>

Cc: Mitchell, Micheala L <Micheala.Mitchell@dhhs.nc.gov>; Payne, Mark <mark.payne@dhhs.nc.gov>; Burgos, Alexander N <alexander.burgos@oah.nc.gov>

Subject: RE: Health and Human Services Temporary Rules Request for Changes

Thank you for your quick response on clarifying this.

Nadine Pfeiffer

Rules Review Manager

Division of Health Service Regulation

[NC Department of Health and Human Services](#)

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Fax: 919-733-2757

nadine.pfeiffer@dhhs.nc.gov

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Burgos, Alexander N

Subject: FW: Health and Human Services Temporary Rules Request for Changes

From: Ascher, Seth M <seth.ascher@oah.nc.gov>

Sent: Tuesday, January 10, 2023 5:34 PM

To: Pfeiffer, Nadine <nadine.pfeiffer@dhhs.nc.gov>

Cc: Mitchell, Micheala L <Micheala.Mitchell@dhhs.nc.gov>; Payne, Mark <mark.payne@dhhs.nc.gov>; Burgos, Alexander N <alexander.burgos@oah.nc.gov>

Subject: RE: Health and Human Services Temporary Rules Request for Changes

Nadine,

After consulting with my colleagues, I stand by the interpretation raised in my initial RFC. That is, because G.S. 150B-21.1(a4) specifically requires that “[t]he statement [of need] must be signed by the head of the agency adopting the temporary rule,” the general provisions in G.S. 143B-10 do not allow for the delegation of signing the statement of need. Here, if the statement of need is not signed by the “head of the agency adopting the temporary rule,” I will have to issue a staff opinion identifying this issue for the Commission.

I recognize that the language in box 10 of the “Temporary Rule-Making Findings of Need” form could be misleading. Regardless of what happens with these particular rules, I will discuss clarifying the form with the Commission Chair and updating guidance to rule-making coordinators.

Separately, if you want to stand by the delegation, I will also need to advise the Commission that the delegation form is unsigned. I am happy to give the Commission the additional context that this is a directive that is posted on the NCDHHS website, but that does not eliminate the need for a signature.

Both of these issues would be cured by having the “head of the agency” sign the statement of need. If the agency does not choose to correct the signature before the Commission meeting, and assuming any other issues are resolved, I could recommend approval conditional upon correcting the signature. I cannot speak to whether that is the action the Commission would decide to take.

Sincerely,

Seth Ascher

Counsel to the North Carolina Rules Review Commission
Office of Administrative Hearings
(984) 236-1934

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Burgos, Alexander N

From: Pfeiffer, Nadine
Sent: Tuesday, January 10, 2023 12:31 PM
To: Ascher, Seth M
Cc: Burgos, Alexander N; Mitchell, Micheala L; Payne, Mark
Subject: Directive II-24

Hi Seth,

Here is the Directive II-24 on the DHHS website for delegating authority to the DHSR Director. As you will see, this copy is the same copy that was submitted with the temporary rules, and it is not signed.

<https://policies.ncdhhs.gov/departmental/secretarial-directives/delegations/ii-24-delegation-of-authority-to-director-division-of-health-service-regulation>

I have not been successful at getting a signed copy from the Department as of this time. I do not recall what files have been sent to archives, but if I still have the older files in my office, I will look through tomorrow to see if I have a signed copy from 2008.

Nadine Pfeiffer

Rules Review Manager

Division of Health Service Regulation

[NC Department of Health and Human Services](#)

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Burgos, Alexander N

Subject: FW: Health and Human Services Temporary Rules Request for Changes
Attachments: RFC HHS Performance Standards Temp Rules.docx

From: Ascher, Seth M
Sent: Tuesday, January 10, 2023 10:56 AM
To: Pfeiffer, Nadine <nadine.pfeiffer@dhhs.nc.gov>
Cc: Mitchell, Micheala L <Micheala.Mitchell@dhhs.nc.gov>; Payne, Mark <mark.payne@dhhs.nc.gov>
Subject: Health and Human Services Temporary Rules Request for Changes

Good morning,

I'm the attorney who reviewed the Temporary Rules submitted by the North Carolina Department of Health and Human Services for the January 2023 RRC meeting. The RRC will formally review these Rules at its meeting on Thursday, January 19, 2023, at 9:00 a.m. The meeting will be a hybrid of in-person and WebEx attendance, and an invite should be sent to you as we get close to the meeting. If there are any other representatives from your agency who want to attend virtually, let me know prior to the meeting, and we will get invites out to them as well.

Attached are Requests for Changes Pursuant to G.S. 150B-21.10. Please submit the revised Rules and forms to me via email, no later than 5 p.m. on January 13, 2023.

In the meantime, please let me know if you have any questions or concerns.

Seth Ascher
Counsel to the North Carolina Rules Review Commission
Office of Administrative Hearings
(984) 236-1934

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Burgos, Alexander N

Subject: FW: Health and Human Services Temporary Rules Request for Changes

From: Pfeiffer, Nadine <nadine.pfeiffer@dhhs.nc.gov>

Sent: Tuesday, January 10, 2023 12:46 PM

To: Ascher, Seth M <seth.ascher@oah.nc.gov>

Cc: Mitchell, Micheala L <Micheala.Mitchell@dhhs.nc.gov>; Payne, Mark <mark.payne@dhhs.nc.gov>; Burgos, Alexander N <alexander.burgos@oah.nc.gov>

Subject: RE: Health and Human Services Temporary Rules Request for Changes

Hi Seth,

Also, what I recall is that you agreed that I could send you a link to the DHHS website that housed the Directive II-24 because you said if it was public information, it would be the most up to date information out here. I just emailed you the web link to that document.

Also something to share with your coworkers is that the 0500 form makes note of the function of the delegation of authority for the rulemaking authority signature under G.S.143B-10(a) that states "(a) Assignment of Functions. - Except as otherwise provided by this Chapter, the head of each principal State department may assign or reassign any function vested in him or in his department to any subordinate officer or employee of his department." For our future rulemaking purposes, if the RRC will not honor this statement for delegation on the form any longer, it will be important to know so we can do the right thing and obtain the correct signature.

Thank you for taking the time to speak to me today on this.

Nadine Pfeiffer

Rules Review Manager

Division of Health Service Regulation

[NC Department of Health and Human Services](#)

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From: Ascher, Seth M <seth.ascher@oah.nc.gov>

Sent: Tuesday, January 10, 2023 12:30 PM

To: Pfeiffer, Nadine <nadine.pfeiffer@dhhs.nc.gov>

Cc: Mitchell, Micheala L <Micheala.Mitchell@dhhs.nc.gov>; Payne, Mark <mark.payne@dhhs.nc.gov>; Burgos, Alexander N <alexander.burgos@oah.nc.gov>

Subject: RE: Health and Human Services Temporary Rules Request for Changes

Nadine,

Thanks for your call earlier related to this request for changes. To summarize what we discussed:

1. I am going to discuss with my colleagues at RRC the issue related to the delegation of signature authority for the finding of need under G.S. 150B-21.1(a4). I'll follow up with a more detailed answer afterwards.
2. You are going to work on getting me a signed copy of the existing DHHS Directive Number II-24.

Sincerely,

Seth Ascher

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Thank you!

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