



“Access to Quality Health Care for All of South Carolina”

To: Member of the House Ways and Means CON Ad Hoc Committee
From: SC Primary Health Care Association
Date: April 15, 2022
Re: Repeal of CON

Mr. Chairman and Members of the Committee:

I write today on behalf of the SC Primary Health Care Association, our Community Health Center (or Federally Qualified Health Center) membership, and the more than 400,000 South Carolinians they serve each year to ask that you exempt our Federally Qualified Health Centers from the state’s current Certification of Need law as part of your discussions and consideration of CON reform/repeal.

We do not feel it is appropriate for us to advocate for or against changes in existing law beyond those impacting our centers. Therefore, rather than take a position on overall CON repeal or reform, we are instead focusing only on that piece of the process that impacts the services provided by the health centers. As such, we are simply requesting that, as you consider S.290, you include in any final legislation a repeal of the CON process for the state’s Federally Qualified Health Centers moving forward.

If, however, a simple exclusion for FQHCs is not possible, then we would advocate for reform that deletes the monetary threshold for equipment purchases, thereby exempting equipment from the requirement of obtaining a certificate of need.

If a complete exclusion of equipment is not possible, we would then ask for either:

- a substantial increase of the threshold on equipment amounts; or
- a change in the formula to include only the cost of the equipment when applying the threshold, not the cost of renovations or construction required as part of the purchase.

It is our belief that allowing our centers to obtain necessary equipment more readily will directly and immediately benefit the South Carolinians we serve and provide a better, more thorough level of care for a sometimes-underserved population that experiences an array of health care needs.

Thank you for your time and consideration of this request. We deeply appreciate your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Vicki M. Young".

Vicki M. Young
Chief Operating Officer