

October 4, 2023

Llogan R. Walters
Assistant Attorney General
North Carolina Department of Justice
P.O. Box 629
Raleigh, NC 27602-0629

Dear Assistant Attorney General Walters:

I write in further response to your June 20, 2023 letter regarding oncology services at the Mission Health Cancer Center (“Cancer Center”). Mission Health System (“Mission”) remains deeply committed to providing quality oncology services to cancer patients in Western North Carolina, and there are no plans to reduce such services at the Cancer Center nor to close the Mission Medical Oncology practice. Rather than restate my prior responses, my July 19, 2023 and August 21, 2023 responses to your June 20, 2023 letter are incorporated herein by reference.

As stated in my July 19, 2023 response, much of the data you requested in your June 20, 2023 letter is not information that Mission keeps in the ordinary course of its business. Nonetheless and in an effort to provide your office with as much information as possible, Mission personnel have worked diligently to compile responsive data and certain of that data is provided below.

In your June 20, 2023 letter, you requested data showing “The number of referrals Mission made to non-Mission oncology practices for each month since February 2019.” Because Mission does not maintain this kind of information, Mission had to work with relevant experts to develop a data query to provide its response using the best information available at the time of this response.

To develop the responsive data set out below, Mission took the following steps:

1. Mission has a Cerner Electronic Medical Record system (“Cerner system”) that is available to all credentialed providers.
2. Within the Cerner system, Mission searched for all referral data entries tagged with any referral type that included the word “oncology” in the name (such as, “surgical oncology, radiation oncology, and medical oncology”) and was made between January 1, 2019 and June 30, 2023.
3. Next, Mission filtered out internal referrals by narrowing the data to referrals sent to clinics that are external to the Mission Health System where Mission could not easily verify that clinic physicians are members of the Mission Medical Staff.¹ Indeed, it is likely that the data below **includes** referrals to some Mission-credentialed providers who practice at clinics that are external to the Mission Health System (*i.e.*, the summary of external referrals is overinclusive and likely includes some referrals to members of the Mission medical staff working at facilities that are not affiliated with Mission).
4. Last, Mission accounted, as best as possible, for any clinic that changed from being internal to the Mission Health System to external to the Mission Health System, or vice versa, during the relevant period where Mission could not easily verify that clinic physicians are members of the Mission Medical Staff. For example, if a referral receiving facility was internal to the Mission Health System from January 2019 through December 2021, only “oncology” referrals to that facility after

¹ Note that, because referrals are sent to a receiving clinic, rather than a receiving provider, Mission was not always able to narrow the data based on whether the receiving provider was or was not credentialed at Mission.

December 2021 are reflected in the data above. However, to remain conservative in preparing the data, if any receiving facility changed status from internal to external or vice versa multiple times during the period (e.g., switched from external, to internal, and back to external), it was considered external for the entire period.

- Please note that it is not mandatory for a credentialed provider to enter a referral in the Cerner system. Thus, the data below may not include all responsive referrals.

Below please find the results of that query based on the best available information at the time of this response:

Number of Referrals Mission Made to Non-Mission Oncology Practices, 2019-June 2023					
Month	2019	2020	2021	2022	2023
January	152	68	35	27	26
February	111	54	44	26	40
March	108	53	46	17	28
April	136	55	30	24	30
May	128	40	38	40	44
June	121	46	13	30	64
July	157	51	22	22	
August	152	39	21	35	
September	125	37	16	38	
October	128	44	23	40	
November	81	37	29	34	
December	78	47	20	34	

Your June 19, 2023 letter also requested “[t]he number of appointments with the Mission Medical Oncology practice cancelled by Mission (as opposed to the patient) for each month[] since February 2019.” Again, because Mission does not maintain this kind of information, Mission had to work with relevant experts to develop a data query to provide its response using the best information available.

To develop the responsive data set out below, Mission took the following steps:

- Mission has a Cerner Electronic Medical Record system (“Cerner system”) that is available to all credentialed providers. The Cerner system records appointment cancellation data when a cancelled appointment is changed or rescheduled in that system.

2. Mission queried the Cerner system for appointment data for the Mission Medical Oncology practice. Because that practice did not exist in 2019, the appointment data queried ran from 2020 and June 2023.
3. Within that data set, Mission queried appointments marked as “Cancellations.”
4. To determine if the cancellation was made by the practice rather than the patient, Mission analyzed the “Cancel_Rescheduled_Reason” data field and counted any entry in which that field reflected that the practice cancelled the appointment.
 - a. Note, that the “Cancel_Rescheduled_Reason” data field is not a mandatory field. As such the data below may not reflect all appointments cancelled by the practice. Further, because the “Cancel_Rescheduled_Reason” field utilizes “free text,” this analysis required Mission to make assumptions when the “reason” for the cancellation was not readily apparent from the data. Thus, the data below may include appointment cancellations that were not, in fact, cancelled by the practice or omit cancellations that were, in fact, made by the practice.

Below please find the results of that query:

Number of Mission Cancellations 2020-June 2023				
Month	2020	2021	2022	2023
January	0	10	6	5
February	0	5	0	6
March	0	2	9	9
April	0	2	3	14
May	0	2	4	8
June	0	4	10	3
July	0	3	5	
August	5	3	5	
September	9	5	6	
October	18	3	5	
November	6	5	2	
December	7	7	5	

Finally, in response to your remaining queries, there were no leaves or vacations for months when Mission employed three or fewer oncologists (May 2023 to present). Below please find the dates of employment of the full-time oncologists² Mission has employed with the Mission Medical Oncology practice:

Provider	Dates of Employment
Dr. Albert Quiery	March 16, 2020-April 21, 2023
Dr. Kerri McGovern	July 20, 2020-August 18, 2023
Dr. Jonming Li	April 12, 2021-November 17, 2021
Dr. Chelsea Osterman	July 6, 2021-September 30, 2022
Dr. Michael Burke	July 6, 2021-November 26, 2023

We believe this submission completes Mission's response to your June 19, 2023 letter. My offer for a meeting with you to discuss any ongoing concerns remains open. We look forward to working with you and your office in the future.

Sincerely yours,



Greg Lowe
President, North Carolina Division

² My May 22, 2023 letter to you stated that Mission Medical Oncology hired six full-time oncology physicians since 2020. In fact, the practice hired five such physicians in that time.