



NC DEPARTMENT OF  
**HEALTH AND  
HUMAN SERVICES**

ROY COOPER • Governor

KODY H. KINSLEY • Secretary

MARK PAYNE • Director, Division of Health Service Regulation

VIA EMAIL ONLY

June 22, 2022

Gary S. Qualls  
Gary.qualls@klgates.com

**No Review**

**Record #:** 3931  
**Date of Request:** June 17, 2022  
**Facility Name:** UNC Hospice, Chapel Hill  
**FID #:** 060018  
**Business Name:** University of North Carolina Hospitals at Chapel Hill  
**Business #:** 1900  
**Project Description:** Relocate existing hospice agency  
**County:** Orange

Dear Mr. Qualls:

The Healthcare Planning and Certificate of Need Section, Division of Health Service Regulation (Agency) received your correspondence regarding the project described above. Based on the CON law **in effect on the date of this response to your request**, the project as described is not governed by, and therefore, does not currently require a certificate of need. If the CON law is subsequently amended such that the above referenced proposal would require a certificate of need, this determination does not authorize you to proceed to develop the above referenced proposal when the new law becomes effective.

This determination is binding only for the facts represented in your correspondence. If changes are made in the project or in the facts provided in the correspondence referenced above, a new determination as to whether a certificate of need is required would need to be made by this office.

Please do not hesitate to contact this office if you have any questions.

Sincerely,

Kim Meymandi  
Project Analyst

Micheala Mitchell  
Chief

cc: Acute and Home Care Licensure and Certification Section, DHSR

**NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • DIVISION OF HEALTH SERVICE REGULATION**

**HEALTHCARE PLANNING AND CERTIFICATE OF NEED SECTION**

LOCATION: 809 Ruggles Drive, Edgerton Building, Raleigh, NC 27603  
MAILING ADDRESS: 809 Ruggles Drive, 2704 Mail Service Center, Raleigh, NC 27699-2704  
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AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

June 17, 2022

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**Via E-Mail**

Micheala Mitchell, Chief  
Kim Meymandi, Project Analyst  
Healthcare Planning and Certificate of Need Section  
Division of Health Service Regulation  
N.C. Department of Health and Human Services  
809 Ruggles Drive  
Raleigh, NC 27603

Re: No Review Request Regarding UNC Hospice, Chapel Hill's Relocation of its Hospice Home Office Within Service Area

Dear Ms. Mitchell and Ms. Meymandi:

We represent University of North Carolina Hospitals at Chapel Hill ("UNCH"), which owns and operates a Medicare-certified hospice office known as UNC Hospice, Chapel Hill, currently located at 1101 Weaver Dairy Road, Suite 200, Chapel Hill, NC, 27514. That UNC Hospice, Chapel Hill Office is licensed as HOS3293. See also Exhibit 1 for SHCC Home County Patient Origin Data for UNC Hospice, Chapel Hill (Orange County Hospice Office).<sup>1</sup>

The purpose of this letter is to inform the North Carolina Department of Health and Human Services, Division of Health Service Regulation, Healthcare Planning and Certificate of Need Section (the "Agency") that, in the fall of this year, UNCH plans to relocate the UNC Hospice, Chapel Hill Office to Suite 2041 in the Hedrick Building on UNCH's campus, located at 211 Friday Center Dr., Chapel Hill, NC 27517, a short distance away in the same town and county.

We ask that the Agency confirm that this relocation is non-reviewable because it does not constitute a new institutional health service. Under North Carolina law, a CON is required only prior to offering or developing a "new institutional health service." New institutional health services include a variety of services and activities, including constructing, developing, or

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<sup>1</sup> This data is also found at <https://info.ncdhhs.gov/dhsr/mfp/pdf/2022/committeemeet.html#ltbh>.

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establishing a new “hospice office” under N.C. Gen. Stat. §§ 131E-176(9b) and 131E-176(16)(a). However, relocating an existing hospice office is reviewable only if either: (1) the cost to relocate the office exceeds \$4 Million;<sup>2</sup> or (2) the office is relocated outside of the hospice agency’s existing service area.<sup>3</sup>

Here, UNC Hospice Chapel Hill’s office relocation implicates neither CON trigger because the costs to relocate are projected to be less than \$50,000 (for minor renovations and cosmetic changes) and the new office will be in the same service area as the existing office. Therefore, please confirm that this proposed hospice office relocation is not CON reviewable because it does not constitute a new institutional health service.

As we will outline in separate correspondence to the Division’s Licensure and Certification Section, UNCH’s Chatham County Hospice Office (HOS0370) will eventually be closing and shifting its patients to the UNC Hospice, Chapel Hill Office at some point after the foregoing Orange County relocation occurs. See also Exhibit 2 for SHCC Home County Patient Origin Data for UNCH’s Chatham County Hospice Office.<sup>4</sup> We are not currently relinquishing the CON rights to UNCH’s Chatham County Hospice Office. That will come later, and we will notify you by separate correspondence when we want that relinquishment to occur.

If you require additional information, please do not hesitate to contact me at the above number. Thank you in advance for your review of this request.

Sincerely,

  
Gary S. Qualls

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<sup>2</sup> N.C. Gen. Stat. § 131E-176(16)(b).

<sup>3</sup> N.C. Gen. Stat. § 131E-176(16)(q).

<sup>4</sup> This data is also found at <https://info.ncdhhs.gov/dhsr/mfp/pdf/2022/committeemeet.html#1tbt>.

**Exhibits**

1. Excerpts from Chapter 13: Hospice Data by County of Patient Origin – 2021 Data Prepared for 2022 SHCC Meetings to Develop 2023 SMFP, Reflecting Data for UNCH’s Orange County hospice office
2. Excerpts from Chapter 13: Hospice Data by County of Patient Origin – 2021 Data Prepared for 2022 SHCC Meetings to Develop 2023 SMFP, Reflecting Data for UNCH’s Chatham County hospice office

## Chapter 13: Hospice Data by County of Patient Origin - 2021 Data

Lic. #	Facility County	Facility Name	Admissions	Days of Care	Deaths
HOS2008	New Hanover	Liberty Home Care and Hospice	1	37	1
HOS1445	Mecklenburg	Novant Health Hospice	1	34	1
HOS0613	Carteret	Carteret Health Care Home Health & Hospice	1	31	0
HC0228	Wayne	3HC	1	16	2
HOS3010	Brunswick	Community Home Care and Hospice	1	13	1
HOS1581	Guilford	Hospice of the Piedmont, Inc.	1	2	1
<b>Onslow Totals</b>			<b>605</b>	<b>42,181</b>	<b>547</b>

## Agencies or Offices serving residents of Orange

HOS3293	Orange	UNC Hospice, Chapel Hill	186	12,184	160
HOS0021	Durham	Duke Hospice	72	6,215	69
HOS3147	Wake	Amedisys Hospice	33	5,685	15
HOS2281	Wake	Promedica Hospice - Raleigh	24	5,431	28
HC0361	Alamance	Hospice and Palliative Care Center of Alamance Caswell	44	3,943	47
HOS3823	Alamance	Amedisys Hospice	53	3,752	28
HOS3135	Chatham	Transitions LifeCare	53	3,543	50
HOS3304	Durham	Liberty Home Care and Hospice	19	1,777	14
HOS3063	Alamance	Community Home Care and Hospice	14	1,041	8
HOS4907	Chatham	SECU Jim & Betsy Bryan Hospice Home of UNC Health Car	81	755	72
HC0393	Nash	Hospice and Palliative Care of Nash General Hospital	1	238	0
HOS2034	Lee	Community Home Care and Hospice	2	201	0
HOS3793	Durham	Duke Hospice	14	87	16
HOS3049	Alamance	Liberty Home Care and Hospice	1	81	0
HOS5439	Person	Medi Home Health & Hospice	2	69	0
HOS2223	Wake	Community Home Care & Hospice	1	56	0
HOS3149	Chatham	Liberty Home Care and Hospice	1	14	1
<b>Orange Totals</b>			<b>601</b>	<b>45,072</b>	<b>508</b>

## Agencies or Offices serving residents of Pamlico

HOS2302	Craven	Community Hospice, LLC	21	2,543	13
HOS0394	Pamlico	Hospice of Pamlico County, Inc.	48	2,052	40
HOS3347	Craven	PruittHealth Hospice - New Bern	4	441	4
HOS4623	Carteret	SECU Crystal Coast Hospice House	0	133	0
HOS4682	Craven	Craven County Hospice	0	13	1
<b>Pamlico Totals</b>			<b>73</b>	<b>5,182</b>	<b>58</b>

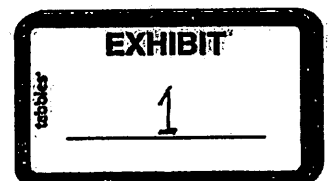
## Agencies or Offices serving residents of Pasquotank

HOS1677	Pasquotank	Albemarle Home Care and Hospice	111	8,701	112
HOS3301	Pasquotank	Community Home Care and Hospice	102	7,662	107
HOS4596	Washington	Amedisys Hospice Care	22	1,540	12
<b>Pasquotank Totals</b>			<b>235</b>	<b>17,903</b>	<b>231</b>

## Agencies or Offices serving residents of Pender

HOS3052	Pender	Lower Cape Fear and LifeCare	294	12,545	271
HOS4018	Brunswick	Amedisys Hospice Care	36	3,857	19

Figures were taken from the 2021 Hospice License Renewal Applications.



## Chapter 13: Hospice Data by County of Patient Origin - 2021 Data

Lic. #	Facility County	Facility Name	Admissions	Days of Care	Deaths
<b>Agencies or Offices serving residents of Caswell</b>					
HC0361	Alamance	Hospice and Palliative Care Center of Alamance Caswell	46	3,586	48
HOS3823	Alamance	Amedisys Hospice	50	3,546	42
HOS3063	Alamance	Community Home Care and Hospice	2	593	2
HOS0398	Rockingham	Hospice of Rockingham County	9	488	8
HOS5439	Person	Medi Home Health & Hospice	5	271	3
HOS1303	Surry	Mountain Valley Hospice and Palliative Care	1	6	1
<b>Caswell Totals</b>			<b>113</b>	<b>8,490</b>	<b>104</b>
<b>Agencies or Offices serving residents of Catawba</b>					
HOS0367	Catawba	Carolina Caring, Inc.	1,049	96,505	938
HOS0389	Lincoln	Hospice & Palliative Care Lincoln County	74	8,196	64
HOS1122	Watauga	Medi Home Health and Hospice	11	2,117	9
HOS0185	Caldwell	Amorem	37	1,798	35
HOS3273	Iredell	Community Home Care and Hospice	12	804	9
HOS0364	Burke	Amorem	9	606	7
HOS0363	Avery	Medi Home Hospice	3	403	2
HOS0387	Iredell	Hospice of Iredell County, Inc.	6	317	5
HOS1338	Iredell	Hospice of Iredell County, Inc.	5	289	2
HOS3181	Iredell	Gordon Hospice House	9	76	10
HOS1702	Mecklenburg	Hospice & Palliative Care Lake Norman	2	37	2
HOS1445	Mecklenburg	Novant Health Hospice	11	28	11
HOS039	Alexander	Alexander Hospice	1	6	1
HOS4599	Rowan	Novant Health Hospice	2	6	2
H0010	Mecklenburg	Novant Health Presbyterian Medical Center	2	4	2
HC1498	Yadkin	Mountain Valley Hospice and Palliative Care	1	3	1
HOS3084	Davie	Trellis Supportive Care	2	2	2
HOS1303	Surry	Mountain Valley Hospice and Palliative Care	1	2	1
HOS0372	Davidson	Hospice of Davidson County, Inc.	1	1	1
<b>Catawba Totals</b>			<b>1,238</b>	<b>111,200</b>	<b>1,104</b>
<b>Agencies or Offices serving residents of Chatham</b>					
HOS2034	Lee	Community Home Care and Hospice	61	13,465	52
HOS0370	Chatham	UNC Hospice	152	8,945	123
HOS3149	Chatham	Liberty Home Care and Hospice	50	4,366	40
HOS2281	Wake	Promedica Hospice - Raleigh	7	2,915	9
HOS3135	Chatham	Transitions LifeCare	23	1,932	19
HOS3147	Wake	Amedisys Hospice	18	1,174	12
HOS4907	Chatham	SECU Jim & Betsy Bryan Hospice Home of UNC Health Car	75	526	67
HOS0021	Durham	Duke Hospice	7	423	7
HOS4736	Randolph	Hospice of Randolph County	11	296	13
HOS3086	Lee	Liberty Home Care and Hospice	1	194	1
HOS3823	Alamance	Amedisys Hospice	10	183	9

Figures were taken from the 2021 Hospice License Renewal Applications.

**EXHIBIT**

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