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AUG 01 2011

Medical Facilities
Planning Section

Hospice of Rockingham County

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**Public Comment to the North Carolina State Health Coordinating Council
Regarding the 2012 State Medical Facilities Plan**

**August 1, 2011
Room 104 Brown Building
Dorthea Dix Campus
Raleigh, NC**

Good afternoon members of the State Health Coordinating Council and members of the public. My name is Lynn Flanagan and I am the Interim Executive Director of Hospice of Rockingham County. I am here today to make a public comment in support of an adjusted need determination for three inpatient hospice beds in Rockingham County.

Hospice of Rockingham County provides a full complement of both Medicare-certified hospice home care and inpatient hospice services. Our hospice serves the majority of hospice-eligible patients in Rockingham County. In 2007, Hospice of Rockingham County opened a licensed hospice facility with three inpatient beds and five residential beds. The three inpatient beds have been operating at full capacity for over two years and the facility often has a waiting list for admission. The occupancy of our residential beds has been consistently low and we seldom have more than two patients. With such high utilization of the inpatient beds we recognize the need to convert some of the residential beds into inpatient beds.

Multiple factors support our request for the adjusted need determination.

First of all, the demand for inpatient hospice beds in Rockingham County far exceeds the current three bed capacity. During the past two years, the annual occupancy of the three inpatient beds has exceeded 100 percent. The high occupancy, combined with the waiting list data, justifies the request for three additional inpatient hospice beds.

Secondly, Hospice of Rockingham County is the sole inpatient hospice facility provider in the county and is geographically distant from other licensed inpatient hospice facilities in Guilford, Forsyth and Alamance Counties. No hospice facilities are present in the adjoining counties to the east, west and north.

Third, the population of Rockingham County has a higher average age and higher mortality rate as compared to statewide averages.

And fourth, the proposed expansion of the inpatient hospice beds in Rockingham County has extensive support from physicians, hospitals and County officials.

We have reviewed the draft 2012 State Medical Facilities Plan that correctly shows that for the period ending September 30, 2010 the three inpatient beds at Hospice of Rockingham County achieved 119 percent occupancy. This extremely high occupancy occurs because we often have a waiting list for inpatient admission and new patients are often admitted to the facility within hours of a bed becoming available. Also, some patients initially admitted to an inpatient hospice bed are reassessed in a few days and are appropriately transitioned to a residential hospice bed. Based on these factors, the turnover time for the three inpatient hospice beds is very compressed.

The lack of available inpatient beds is clearly the limiting factor that restricts patient access. Admissions to the inpatient hospice beds are often delayed by several days due to the lack of an available bed. During the eight month period between October 2010 and April 2011, a total of 16 patients died in the hospital or at another facility while waiting admission to an inpatient hospice bed.

Hospice of Rockingham County predicts that without the proposed adjustment, the following adverse effects will occur:

- Patients and families will lack adequate and timely access to specialized inpatient hospice services.
- Acute care lengths of stay at local hospitals will be extended, causing unnecessary expenditures to the healthcare system.
- Occupancy of the three existing inpatient beds will continue to be at or above 100 percent.
- Hospice of Rockingham County will continue to operate the inpatient hospice beds at peak utilization but will be unable to keep pace with the needs of the growing patient waiting list.

We have discussed several options and are convinced that maintaining the status quo is an alternative that fails to respond to the lack of adequate capacity in Rockingham County. Patients, families, physicians and hospital providers strongly advocate that the current inventory of three inpatient hospice beds must be increased. The current situation limits access and creates hardship, which are inconsistent with the goals of hospice. Another option would be to request an adjusted need determination for four or more additional inpatient hospice beds. However we believe that this alternative would be overreaching and too costly to achieve.

Petitioning for an adjusted need determination for three inpatient hospice beds is the ideal alternative because the requested capacity is sufficient to eliminate the waiting list and allow for future growth. Also, Hospice of Rockingham County can pursue this alternative with minimal cost and an expedited schedule.

Our request for an adjustment of three inpatient hospice beds would not cause unnecessary duplication of services based on the high utilization of the current inpatient beds. No other hospice providers serve a significant number of inpatient hospice patients from Rockingham County.

Our hope is that with the approval of this petition, we will have the opportunity to submit a CON application in early 2012 and quickly increase inpatient hospice capacity to better serve our patients and families. Thank you for your consideration of our request.