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March 21, 2014

Elizabeth K. Brown
Planner, Medical Facilities Planning Branch
Division of Health Service Regulation
NC Department of Health and Human Services
809 Ruggles Drive
Raleigh, NC 27603

Via electronic mail to: Elizabeth.brown@dhhs.nc.gov

Dear Ms. Brown:

Please accept this letter as comments from the Association for Home & Hospice Care of North Carolina regarding the Petition for Change in Methodology regarding Hospice Inpatient Beds submitted by Heath Law Firm (HLF), PLLC on January 31, 2014 as drafted by Joy Heath and Ruth Levy. For purposes of simplicity, I will refer to this petition as the HLF Petition.

As I spoke to you at the recent SHCC public hearing, we were reminded that the State Health Coordinating Council (SHCC) has asked the two state associations representing North Carolina hospice care providers, the Association for Home & Hospice Care of North Carolina (AHHC) and the Carolinas Center for Hospice and End of Life Care (TCC), to work collaboratively in 2014 to form an internal hospice workgroup to review the current hospice inpatient methodology, review recent hospice petitions and comments, and determine the direction and approach regarding how to potentially adjust the methodology.

I have been a leader in two previous hospice inpatient methodology workgroups and am co-spearheading our new workgroup. This workgroup will consist of hospices and will seek participation and input from John Thoma, CEO of Hospice of Wake County (petitioner in 2013) and the current petitioner, Attorney Joy Heath.

In summary, because there is an existing workgroup recommended by the SHCC and both hospice associations, I hereby recommend that the petition be denied. We look forward to convening this hospice workgroup and bringing a more thorough work product in 2014.

Cordially,

Tim Rogers
President & CEO