



March 21, 2014

To: State Health Coordinating Council (SHCC) and Long Term Behavioral Health Committee (LTBHC) Members

The Carolinas Center for Hospice and End of Life Care appreciates the opportunity to submit comments on the petition filed by Heath Law Firm in regard to the hospice inpatient bed need methodology. Heath Law Firm requested that the methodology be changed to use the county average length of stay for projecting days of care. While this aspect of the inpatient methodology may warrant modifications, we do not support this petition at this time.

In response to past petitions, the SHCC addressed the need for a workgroup to review the current methodology and determine what changes might be appropriate. Thus as requested, The Carolinas Center for Hospice and End of Life Care (TCC) and Association for Home and Hospice Care of North Carolina (AHHC) are forming an Inpatient Need Methodology workgroup comprised of interested hospice providers and stakeholders. This group will review all aspects of the current inpatient bed need methodology and assess the impact that changes to any component of the calculations may have on need determinations across the state.

We request that the Heath Law Firm petition be denied until such time as the workgroup can conduct a thorough review. I look forward to working with the members of the SHCC and the LTBHC to address this important aspect of the medical facilities planning process. Please contact me if I can be of any assistance.

Sincerely,

Annette Kiser, MSN, RN, NE-BC  
Interim Executive Director  
Director of Quality & Compliance  
[akiser@cchospice.org](mailto:akiser@cchospice.org)  
704-508-1507

NORTH CAROLINA  
1230 SE Maynard Rd  
Suite 203  
Cary, NC 27511

PHONE  
919 459-5380

FAX  
919 459-5390

TOLL FREE  
800 662 8859

SOUTH CAROLINA  
1350 Browning Rd  
Columbia, SC 29210

PHONE  
803 791 4220

FAX  
803 791 5664