

**From:** [Ted Goins](#)  
**To:** [DHSR.SMFP.Petitions-Comments](#)  
**Subject:** [External] Petition for Change in Policy to Exempt CCRCs from Need Determination to Establish Medicare Certified Home Health Agency  
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Dear Members of the Council:

I am writing in support of the petition to exempt CCRCs from the Need Determination in establishing a Medicare Certified Home Health Agency – as defined in Chapter 12 of the NC State Medical Facilities Plan.

Lutheran Services Carolinas operates Trinity Oaks, a licensed CCRC, and is developing another CCRC in Wilmington. We are committed to providing seamless continuity of care for the age-related health services of our residents. With the increased popularity of home and community based care, LSC continues to see the need for the provision of Medicare Certified Home Health within the post-acute care environment. Under the current model, life-care residents are tasked with securing these services from third-party providers. This petition will provide a path for Trinity Oaks and other CCRCs to establish a Medicare Certified Home Health Agency which will allow us to provide another alternative provider for our life-care residents with Home Health needs.

We understand that this exception will allow our community to service only those residents. We also understand that patient choice is always paramount for the provision of health services. And while this exception would allow us to potentially offer an alternative, the patient has the ultimate right to choose his or her health care provider.

Our campus currently operates 115 Licensed Medicare-Certified Skilled Nursing Facility Beds, as well as 45 Licensed Adult Care Home Beds. Similar exemptions exist for these care-related services within the State Medical Facilities Plan, both of which we operate successfully and with high quality of care.

Additionally, as a current SNF Medicare provider, we are well-versed with the Medicare Requirements of Participation and the state and federal regulatory requirements mandated on Medicare service providers. And although our SNF patient volumes may be low, compared to a typical SNF, we operate with the advantage of our CCRC model and under the financial requirements regulated by the NC Department of Insurance; all while delivering exceptional patient care.

We also believe that Home Health Care can be a significant savings to Medicare, when compared to SNF care. The future of Health Care will depend on providing care to patients in the most appropriate setting of care, without sacrificing Quality. As an industry, we must find the most cost-effective models to care for our aging population. This Petition allows Trinity Oaks and other CCRCs to add an additional layer of care, which, at a minimum, will allow for an increased continuity of post-acute care for life-care residents. It also adds an opportunity for Lutheran Services to think more progressively with regards to the provision of health care, which will be essential in today's

health care landscape. As such, we are fully supportive of this Petition for a change in policy relative to Home Health Agencies for CCRCs for the 2019 State Medical Facilities Plan.

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