



March 22, 2018

North Carolina Division of Health Service Regulation
North Carolina State Health Coordinating Council
2704 Mail Service Center
Raleigh, North Carolina 27699-2704

Ladies and Gentlemen of the Council:

My name is Anne Moffat and I am the President and CEO of Sharon Towers, a standalone CCRC in Charlotte, NC. I am writing in support of the petition filed by LeadingAge NC to exempt CCRCs from the Need Determination in establishing a Medicare Certified Home Health Agency.

Our commitment to our residents is to provide a continuum of care that address their health related needs as they age. Years ago, when CCRCs first became popular, the continuum included assisted living and/or skilled nursing care, both of which have similar exemptions to what is being proposed for Home Health.

One of the wonderful benefits of living in a CCRC is the close relationships formed between the residents and staff. We get to know our residents under a number of circumstances, including when their health needs change. Our residents expect and appreciate that we are there to assist them whenever circumstances dictate.

Health Care is changing rapidly and the post-acute care continuum, which used to be limited to assisted living and skilled nursing care, now includes home health services. We would very much like to be able to live up to our promise of being able to provide the appropriate care to our residents as their health needs change even if that care includes home health.

It is my understanding that the proposed petition for change would not limit our residents from being able to choose the home health agency they would like to work with nor does the request expand beyond the residents with whom we have a contract. What it will do is allow our residents within our community who are in need of Medicare certified home health the ability to choose between other home health providers and Sharon Towers' home health – a choice they would greatly appreciate.

We are supportive of the Petition for a change in policy relative to Home Health Agencies for CCRCs for the 2019 State Medical Facilities Plan.

Sincerely,

Anne O. Moffat
President and CEO, Sharon Towers