

From: Catherine Blankenship <Catherine.Blankenship@nhrmc.org>
Sent: Monday, July 29, 2019 11:22 AM
To: DHSR.SMFP.Petitions-Comments
Subject: [External] Rutherford County Fair Haven Nursing Home request for Home Health Agency

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To Whom It May Concern,

As the current Director of NHRMC Home Care with experience in several other Home Health Agencies in North Carolina, Massachusetts, and Georgia, I would like to provide my opinion on the request Fair Haven Nursing Home's petition for an additional Home Health Agency in Rutherford County.

Although the Nursing Home has described their strengths, including better rehospitalization rates than the Home Health Agencies and their status as a community based business, I would dispute their need to open their own home health agency for the following reasons:

- 1) Primarily, the addition of their own home health agency is not a guarantee that their hospitalization rates will improve. They need to look at their post acute transition practices to assure the safety and understanding of patients leaving their facility prior to concluding that adding their own agency would resolve any problems. Unfortunately, a "personal relationship" and the use of an "app" is not a guarantee of success in a patient's home if the transition plan is inadequate.
- 2) The level of care provided in a nursing home is different from the care required in a home setting. The petition implies that this is a relatively simple difference but in reality the expertise required to do this enhances not only outcomes but patient safety.
- 3) Question if the annual number of discharges to the community with home health (130) truly justify the need for another agency
- 4) While admirable, a 5 Star Nursing Facility rating and current readmission rate is no guarantee of the quality of care that would be provided by a facility fun home health agency
- 5) Transportation issues are real and all of us in the state are experiencing the impact of this and other social determinants of health that impact how we provide care
- 6) Their safety and quality plan to see patients in their home on the day of discharge is not a substitute for planning prior to the patient leaving the facility.
- 7) The data provided needs to be expanded upon to justify their request:
 - a. the quoted home health 30 day hospital readmission ranges – is this ALL readmissions or only those from their nursing home
 - b. what other factors impact the readmission rate – length of nursing home stay for example
 - c. what are the readmission rates in their independent and assisted living facility
- 8) Finally, our challenge in health care is to identify how to provide quality care in our communities and how do we continually adapt to assure that happens. This cannot be done in a silo. Although their petition states "They (CMS) are also implementing a new standard of Person Centered Care. The only way to truly address this responsibility is by directly influencing the continuum of care". Adding another agency rather than identify how to strengthen the relationships and expectations of health care partners in the community is not the answer – it only serves to silo care even further.

I would respectfully request that you deny this request.

Thank you

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