

Written Comments
Of Well Care Health, LLC
on the Petition of BAYADA Home Health Care, Inc.
For an Adjusted Need Determination
For One Medicare-Certified Home Health Office in Buncombe County, NC

TO: DHSR.SMFP.Petitions-Comments@dhhs.nc.gov

DATE: August 11, 2021

The following Written Comments are submitted on behalf of Well Care Health, LLC (“Well Care”) to support the identification of a need for a new home health agency to serve Buncombe County, North Carolina. The unique attributes of Buncombe County strongly support an adjustment to the need determination in the Proposed SMFP. Buncombe County has a significant and growing year-round and seasonal population yet, unlike many Counties in our State, Buncombe County is home to only two existing home health agencies. Buncombe County’s location in the mountains of Western North Carolina creates special travel concerns for home health staff, particularly during winter months. The addition of a new agency in Buncombe County would allow for greater patient access and choice. While Well Care supports the standard methodology, Well Care would urge an examination of the impacts of COVID-19 in this year’s planning process. As explained in more detail below, the special attributes of Buncombe County and the unique dynamics arising from the pandemic support an adjusted need determination to allow Buncombe County to offer its residents access to a third home health agency.

Well Care Health

For more than 33 years, Well Care has built its reputation across North Carolina as being one of the state’s most trusted providers of highly specialized, quality home health care. Well Care’s home health services guide patients through their recoveries in the comfort of their own homes, and Well Care’s top priority is always to place the needs of its patients and their families first.

Well Care’s mission is to provide quality home care to those in need of home health services. Well Care’s interdisciplinary team is committed to delivering skilled, professional home health services to individuals and their families. The goal is to empower clients to achieve desired health outcomes and gain functional independence. Well Care values strong, mutually beneficial relationships with referral sources, clients and their families, and the community at large. Well Care has repeatedly been recognized by the Centers of Medicare and Medicaid Services as a “5-star” market-leader in quality of care.

In large part due to its mission-commitment and focus on care quality, Well Care has experienced substantial growth in recent years, and now cares for more than 3,600 patients on its home health patient census. Well Care serves patients in more than 40 counties in North Carolina.

Well Care currently operates home health agencies based in the following counties:

County	Name of Facility
Mecklenburg	Well Care Home Health of the Piedmont, Inc.
New Hanover	Well Care Home Health, Inc.
Davie	Well Care Home Health of the Triad, Inc.
Wake	Well Care Home Health of the Triangle, Inc.
Wake	Well Care Home Health of the Southern Triangle, Inc.

If approved, Well Care is well-positioned to expand to provide services through an agency based in Buncombe County. Well Care is interested in and capable of bringing quality home health agency services to Buncombe County and offering patients and families increased access to high quality home health care services.

The Standard Methodology & Adjusted Need

Well Care supports the state’s standard need determination methodology. Well Care has not previously opted to petition the State to identify an adjusted need determination in any County. In fact, in prior years, Well Care has submitted Comments supporting the standard methodology and urging the State to reject petitions for adjusted need determinations for home health agency offices in Brunswick and Randolph Counties.

Notwithstanding the above, Well Care recognizes that the health planning process, by design, allows for the identification of an adjusted need when unique circumstances exist. To have only two home health agencies in Buncombe County is exceptional considering Buncombe County’s size and location. Based on the special attributes of Buncombe County and the resource needs in this geographic area, Well Care believes an adjusted need determination for one Medicare-certified home health agency is appropriate.

Special Attributes of Buncombe County

Well Care’s support for an adjusted need determination for Buncombe County is based on Well Care’s experience operating home health agencies across various North Carolina branch locations. Buncombe County has a population of over 265,000 residents but is home to only two home health agency offices. As a result, Buncombe County has a lower ratio of home health agency offices to population than other areas of our State. Well Care operates from agencies based in Mecklenburg, Wake, New Hanover, and Davie Counties, where the agency-to-population ratios are largely materially higher than Buncombe County. Likewise, the Statewide agency-to-population ratio well exceeds that for Buncombe County.

	2021 Population	#Medicare-Certified HHAs	#HHA per 100,000
Davie	44,160	1	2.26
North Carolina	10,658,717	216	2.03
Wake	1,117,556	15	1.34
Mecklenburg	1,138,128	14	1.23
New Hanover	237,448	2	0.84
Buncombe	265,351	2	0.75

Source:

https://files.nc.gov/ncosbm/demog/countytotals_2020_2029.html

Based on Well Care's experience serving other areas of North Carolina, Well Care finds it surprising that a County such as Buncombe County has only two existing home health agencies. Buncombe County is the 7th largest county by population in North Carolina, has a significant number of residents aged 65 years and older, and has experienced double-digit percentage growth in population in recent years. Buncombe County's year-round population taken together with a significant influx of seasonal residents suggests Buncombe County would be well served by additional home health agency services.

Buncombe County has special attributes based on its location in Western North Carolina. The terrain in the area increases travel constraints for staff who are called upon to visit patients within their homes. The climate of Buncombe County differs from other areas of our State and creates concerns during winter months. An adjusted need determination would create an opportunity for a third agency to add greater access and a new provider option for residents of Buncombe County.

Buncombe County's existing home health agencies are high-volume agencies as compared to many of the agencies serving North Carolina Counties. Moreover, the Counties surrounding Buncombe County are likewise home to relatively few home health agencies. Notwithstanding the standard methodology's determination of no-need in Buncombe County, an adjusted need for a new agency in Buncombe County is appropriate considering Buncombe County's population, the special attributes of the area, and the limited number of existing agencies serving community residents.

COVID-19 Impact

Due to the impact of the COVID-19 pandemic, this year's health planning process appropriately evaluates the extent to which utilization data used in the standard methodology may be understated. Apart from the unique attributes of Buncombe County and its limited number of existing agencies, Well Care supports consideration of the COVID-19 effects on the utilization of home health agency services.

On March 10, 2020, Governor Roy Cooper issued a State of Emergency to coordinate the State's response and protective actions to address the COVID-19 public health emergency and to provide for the health, safety, and welfare of residents and visitors located in North Carolina. On March 27, 2020, Governor Roy Cooper ordered people in the state of North Carolina to stay at home. The Stay-at-Home Order was intended to mitigate the community spread of COVID-19 and to reduce the burden on the state's health care providers and facilities. The Order directed people to stay at home except to visit essential businesses, to exercise outdoors, or to help a family member. The Stay-at-Home Order remained in place until May 22, 2020 when "Phase 2" was authorized by the Governor. Under Executive Order 141, North Carolina entered Safer at Home "Phase 2", which eased certain COVID-19 restrictions to help revive the economy while protecting public health. However, even during Phase 2, most healthcare providers declined face-to-face interactions with members of the public (non-patients).

As COVID-19 continues to upend health care delivery, the preference for home-based care options will continue growing, with consumer sentiment and preferences continuing to shift towards greater acceptance. According to a recent Kaufman Hall survey, 54% of consumers cited fear of contracting COVID-19 as a primary reason to delay care, with 43% citing a fear of going to the hospital as the reason.

For Medicare enrollees specifically, 35% attributed any delays in care with wanting to avoid the hospital setting altogether.¹

Given COVID-19's tragic impact on nursing homes, patients and referral sources will likely continue to avoid institutionalized care in long-term acute care and skilled nursing facilities when possible. Home healthcare is well-positioned to play an ever-larger role in post-acute care going forward. For these reasons, Well Care expects the COVID-19 pandemic will increase demand for home health services in Buncombe County.

Conclusion

Although supportive of the standard methodology, Well Care values the health planning process which allows for appropriate adjustments to the need determinations identified in each year's Proposed State Medical Facilities Plan. For the reasons summarized above, Well Care supports the identification of an adjusted need determination for one Medicare-certified home health agency for Buncombe County.

¹ Joseph, S. (2020, August 5). Forbes. Home Health Care Is A Bright Light During COVID-19 With an Even Brighter Future.