



To: [DHSR.SMFP.Petitions-Comments@dhhs.nc.gov](mailto:DHSR.SMFP.Petitions-Comments@dhhs.nc.gov)

From: Nicholas Dean Lee CEO & President on behalf of  
3HC Home Health and Hospice Care, Inc.  
2402 Wayne Memorial Drive  
Goldsboro, NC 27534  
Phone: 919-735-1387

Date: August 9, 2022

Subject: **Letter of Support of *Petition for Adjustment and Further Study of the Data and Methodology of 2023 SMFP Home Health Agency Need***

3HC Home Health and Hospice Care respectfully submits this letter in support of *Petition for Adjustment and Further Study of the Data and Methodology of 2023 SMFP Home Health Agency Need*.

As a rural provider 3HC provides homecare services to twenty-three counties in eastern North Carolina with an average daily census of twelve hundred patients. 3HC operates nine clinical offices and employs an average of five hundred employees. With forty-one years of operating experience, we have never before experienced the unprecedented operational hardships, staffing shortages, and increasing costs of labor as we have in the last two years.

We agree that the addition of twelve additional CONs without supporting data which also analyzes the impact of such a steep increase will further strain agency's ability to recruit needed staffing for growth and to support current community demands for homecare with a significant statewide nursing shortage.

We further support Wellcare Health's position statement with the following clarifications:

1. We support changing the status of the 12 CONs from active to TBD pending further data analysis by the CON methodology group.
2. We recommend consideration be given to the data collection periods in light of the COVID 19 Public Health Emergency and all Homecare agencies operating under a Contingency Plan or Emergency Action Plan during that time period. The COVID 19 Public Health Emergency has had significant impacts upon recruitment of nurses and obtaining needed medical supplies to provide quality patient care statewide.

Thank you for allowing this public comment period and we appreciate your consideration of our request.

Sincerely,

Nicholas Dean Lee

President & CEO

**Home Health and Hospice Care, Inc.**

2402 Wayne Memorial Drive, Goldsboro, NC 27534

(800) 260-4442 • (919) 735-1387 • Fax (919) 735-8460 • Referrals: (800) 692-4442 • [www.3hc.org](http://www.3hc.org) • [info@3hc.org](mailto:info@3hc.org)

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