



August 10, 2022

DHSR SMFP.Petitions-Comments@dhhs.nc.gov
North Carolina Division of Health Service Regulation
Health Planning
2704 Mail Service Center
Raleigh, NC 27699-2704

To Whom it May Concern:

AuthoraCare Collective is a not-for-profit hospice, palliative care, and advanced illness organization. We were formerly Hospice of Alamance-Caswell & Hospice of Greensboro, and with approximately 40 years of service to our communities across central North Carolina we are committed to empowering patients and families to be active participants in their care journeys, enabling them to live on their own terms through personalized support for mind, body, and spirit. With nearly 500 team members and more than 100 volunteers, we are committed to helping our patients and families author more moments that matter, regardless of the stage of their illness or condition.

AuthoraCare has been and remains a strong supporter of the SMFP process and North Carolina's Certificate of Need regulations. We firmly believe that the state's Certificate of Need regulations provide vital safeguards and parameters to ensure access to quality care while preventing unnecessary and costly duplication of services. We appreciate the important work of the state's planning staff in developing the annual SMFP across various health care sectors.

Upon reviewing the 2023 SMFP, AuthoraCare noted there are 12 home health Certificates of Need proposed in *this year alone*. Upon further examination, we noted that there were only 12 home health agencies proposed *over the last 15 years*. We also noted that over the last 15 years, the most home health agencies proposed at one time were three and that this has only happened once during this time-period.

Based on the 2023 SMFP's extraordinary and unprecedented proposal of need determinations for 12 home health agencies, AuthoraCare believes it is time to modernize the methodology used to determine need to ensure that it produces consistent results and guidance from year to year. We believe this request is consistent with the basic principles and tenets of the SMFP process. **We respectfully request consideration for the removal of the 12 need determinations in chapter 12 of the proposed SMFP for home health agencies and to establish a workgroup to study and revise the methodology for determining home health needs in North Carolina.**

AuthoraCare supports the recent public hearing comments by the Association of Home and Hospice Care of North Carolina expressing concerns about the current home health methodology and recommending the formation of a workgroup that will modernize the methodology. **We believe that**



authoracare.org  800.588.8879

Burlington | 336.532.0100 | 914 Chapel Hill Rd, Burlington, NC 27215

Greensboro | 336.621.2500 | 2500 Summit Ave, Greensboro, NC 27405

Formerly Hospice & Palliative Care Center of Alamance-Caswell & Hospice and Palliative Care of Greensboro

approving the 2023 home health agency need determinations would have a serious, pervasive, and lasting negative impact on North Carolina's home health provider community during a period of unprecedented change and challenge. With such an anomaly of a year, we believe it is the right time to modernize the methodology for home health need determinations.

We appreciate your full consideration of AuthoraCare's comments and our strong request and support for the SHCC to establish a work group chaired by Tim Rogers and Cooper Linton to carefully examine and intentionally modernize the methodology used in determining home health needs.

Thank you for the opportunity to provide these comments and for the important work of the SHCC and DHSR's leadership and staff with the development and oversight of the SMFP's process.

Sincerely,



Kristen Yntema
President/CEO
AuthoraCare Collective