

Competitive Review Written Comments

Project ID#: F-11948-20

FID#: 200733

Submitted by Hospice of Iredell County (DBA: Hospice & Palliative Care of Rowan County)

1) Cost

Criterion (4) – G.S. 131E-183(a)(4)

“Where alternative methods of meeting the needs for the proposed project exist, the applicant shall demonstrate that the least costly or most effective alternative has been proposed.”

Criterion (5) – G.S. 131E-183(a)(5)

“Financial and operational projections for the project shall demonstrate the availability of funds for capital and operating needs as well as the immediate and long-term financial feasibility of the proposal, based upon reasonable projections of the costs and charges for providing health services by the person proposing the services.”

Criterion (7) – G.S. 131E-183(a)(7)

“The applicant shall show evidence of the availability of resources, including health manpower and management personnel, for the provision of the services proposed to be provided”

Hospice & Palliative Care of Rowan County (a dba of Hospice of Iredell County) has shown the lowest costs out of all applicants to begin operation for the new Hospice license for Rowan County (illustrated below, 1.1). This is because the only startup cost that HPCRC is anticipating is training for additional newly hired employees to work in the Rowan County area. This cost was calculated to be \$25,496, which is shown below. As stated in our application, our organization has already renovated and opened an office in Salisbury for Palliative Care operations. This office is readily available to transition to also operate Homecare Hospice upon receiving the Hospice license. Hospice of Iredell County currently has several nurses, an on-call nurse, and a nurse practitioner with an established caseload in Rowan County. These individuals have already completed their orientation and are seeing patients. The board of directors has also approved the anticipated loss of \$195,824.96, our calculated total working capital.

1.1 : Rowan County CON Project Costs

Applicant Name	Project Cost
Hospice & Palliative Care of Rowan County	\$25,496
Adoration Home Health & Hospice	\$31,790
BAYADA Home Health Care Inc.	\$100,000
PruittHealth Hospice-Salisbury	\$100,000
Carolina Caring	\$100,000
Continuum Care of North Carolina	\$115,500
Amedisys Hospice Care	\$129,246
PHC Hospice	\$511,879

2) License and Location

Criterion (6) – G.S. 131E-183(a)(6)

“The applicant shall demonstrate that the proposed project will not result in unnecessary duplication of existing or approved health service capabilities or facilities.”

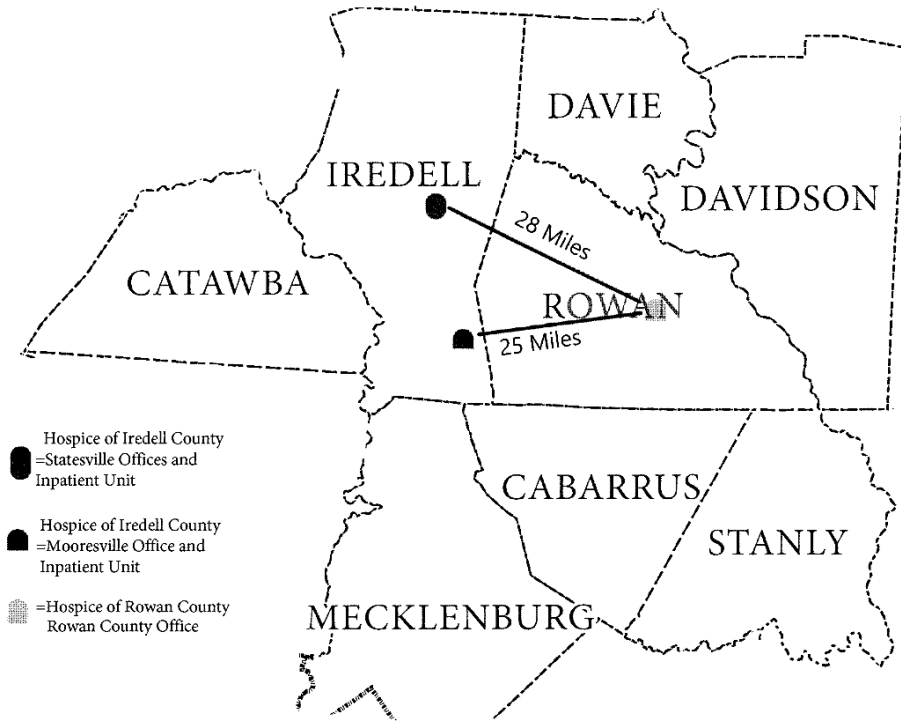
Criterion (12) – G.S. 131E-183(a)(12)

“Applications involving construction shall demonstrate that the cost, design, and means of construction proposed represent the most reasonable alternative, and that the construction project will not unduly increase the costs of providing health services by the person proposing the construction project or the costs and charges to the public of providing health services by other persons, and that applicable energy saving features have been incorporated into the construction plans.”

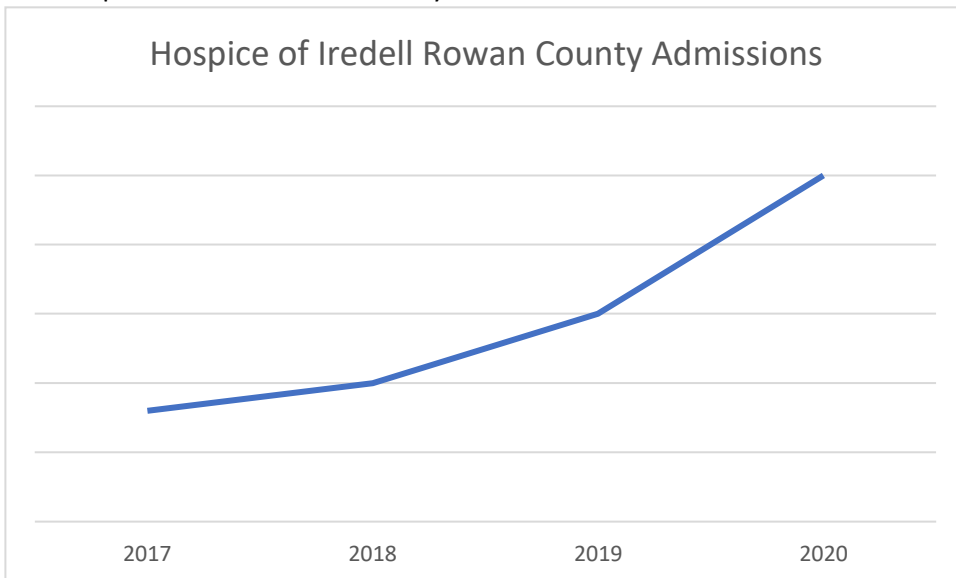
The parent organization of Hospice & Palliative Care of Rowan County, Hospice of Iredell County, has a license for Hospice operations in North Carolina. Only three other applicants of the 8 for the Rowan County license have a Hospice license for North Carolina. Out of the 8 applicants for the Rowan County Hospice license, only two applicants currently have licensed Hospice offices in counties contiguous to Rowan: Hospice of Iredell County and Continuum Care. Of those two applicants only Continuum Care has a Hospice license for Rowan County, but it had a total of zero admissions in 2019.

Hospice of Iredell currently has two licensed Inpatient Hospice units in Mooresville and Statesville. Granting the CON to Hospice & Palliative Care of Rowan County will promote utilization of our existing inpatient facilities because of their convenient location relative to Rowan County. Our Rowan County Palliative Care office (which would be converted to Hospice & Palliative Care of Rowan County after issuance of the license) is less than 30 miles from our two inpatient units in Mooresville (25 miles away) and Statesville (28 miles away)(illustrated below, 2.1). With locations this close to Rowan County, Hospice of Iredell already employs residents of Rowan County and plans to hire more from the area for Hospice operations. We are also already serving patients from Rowan County out of our Iredell County offices. HPCRC’s office in Salisbury has already allowed us a faster response time to patients receiving Palliative Care services, and the same faster response time would be provided to Hospice patients, should we be allowed to operate Hospice services out of Rowan County. Over the past four years, the number of Hospice and Palliative Care patients Hospice of Iredell has admitted from Rowan County has increased by 68% (illustrated below, 2.2). Our Palliative Care services are the leading referral source for Hospice admissions, representing 40% of Hospice admissions in fiscal year 2020. As our application reflects, we anticipate this number to increase greatly with recipience of the Hospice license. Hospice & Palliative Care of Rowan County is focused on needed growth in our community, which is why we want to expand to the contiguous county of Rowan. We choose to expand and open new offices where there is a need for services; we do not expand solely for the sake of growth.

2.1 : HPCRC Offices Map



2.2 : Hospice of Iredell Rowan County Admissions



3) Quality

Criterion (3a) – G.S. 131E-183(a)(3a)

“In the case of a reduction or elimination of a service, including the relocation of a facility or a service, the applicant shall demonstrate that the needs of the population presently served will be met adequately by the proposed relocation or by alternative arrangements, and the effect of the reduction, elimination relocation of the service on the ability of low income persons, racial and ethnic minorities, women, handicapped persons, and other underserved groups and the elderly to obtain needed health care.”

Of the four Hospice licensed programs applying for the CON, please refer to the medicare.gov Hospice Compare report provided below. Only four of the eight applicants are licensed in North Carolina and included in the Hospice Compare report. On each of the 10 indicators on this report Hospice of Iredell County **scored higher** than the three other applicants and well above the national average. Also reference the Hospice CAHPS Quality Measures provided by CMS below. Hospice of Iredell County also scored well above the national averages for all eight indicators. Our organization has received the Hospice Honors award for the past seven years, and for the five of those seven years we have received the highest level of award, Hospice Honors Elite. This is an achievement that no other applicant can match.

www.medicare.gov/hospiceCompare

Data collected between 10/01/2017 and 09/30/2019

Family Experience of Care

*11- Results aren't available for this reporting period

Measure Categories	<u>HOSPICE OF IREDELL COUNTY</u>	<u>CAROLINA CARING INC</u>	<u>CONTINUUM HOME CARE & HOSPICE OF LENIOR COUNTY</u>	<u>PRUITTHEALTH HOSPICE - ROCKY MOUNT</u>	National ave
Communication with family	86%	83%	Not Available ¹¹	80%	81%
Getting timely help	88%	84%	Not Available ¹¹	79%	78%
Treating patient with respect	94%	93%	Not Available ¹¹	90%	91%
Emotional and spiritual support	95%	90%	Not Available ¹¹	90%	90%
Help for pain and symptoms	81%	78%	Not Available ¹¹	74%	75%
Training family to care for patient	79%	77%	Not Available ¹¹	78%	76%
Rating of this hospice	90%	85%	Not Available ¹¹	81%	81%
Willing to recommend this hospice	95%	90%	Not Available ¹¹	82%	84%

Quality of Patient Care

	<u>HOSPICE OF IREDELL COUNTY</u>	<u>CAROLINA CARING INC</u>	<u>CONTINUUM HOME CARE & HOSPICE OF LENIOR COUNTY</u>	<u>PRUITTHEALTH HOSPICE - ROCKY MOUNT</u>	National average
<u>Percentage of patients getting at least one visit from a registered nurse, a physician, a nurse practitioner, or a physician assistant in the last 3 days of life</u>	98.5%	85.4%	96.6%	90.0%	82.4%
<u>Patients who got an assessment of all 7 HIS quality measures at the beginning of hospice care to meet the HIS Comprehensive Assessment Measure requirements</u>	99.2%	98.0%	91.7%	88.3%	88.4%

Hospice Compare Dashboard Hospice of Iredell County

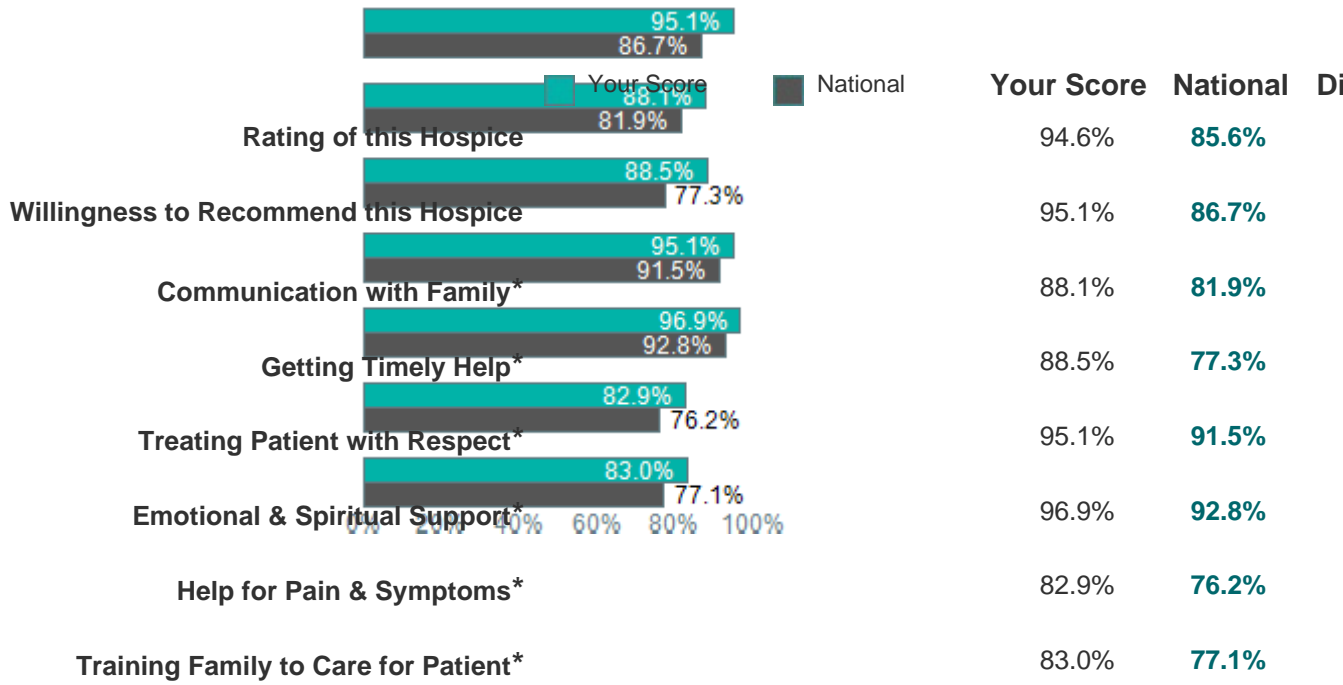
Timeframe: Ending Q1 2020
CMS Complete Surveys: 541

Report Level: Your Hospice
HIS (Type 1 Stay) Discharge Records: n/a

HOSPICE CAHPS QUALITY MEASURES

Report by: Sample Month (8 Quarter Timeframe)

This report has been produced by HEALTHCAREfirst. It does not represent official CAHPS Hospice Survey data.



*Composite Measure

HOSPICE ITEM SET QUALITY MEASURES

HIS data is available for hospices participating with Quality Actionboards.

Your Score is: ↑ Higher than National ● Same as National ↓ Lower than

National

4) Palliative Care

Criterion (4) – G.S. 131E-183(a)(4)

“Where alternative methods of meeting the needs for the proposed project exist, the applicant shall demonstrate that the least costly or most effective alternative has been proposed.”

Criterion (18a) – G.S. 131E-183(a)(18a)

“The applicant shall demonstrate the expected effects of the proposed services on competition in the proposed service area, including how any enhanced competition will have a positive impact upon the cost effectiveness, quality, and access to the services proposed; and in the case of applications for services where competition between providers will not have a favorable impact on cost-effectiveness, quality, and access to the services proposed, the applicant shall demonstrate that its application is for a service on which competition will not have a favorable impact.”

Of the eight applicants, four have Palliative Care programs. Hospice of Iredell’s Pathways Palliative Care Program provides home-based Palliative Care services as well as providing care in four outpatient clinics in Mooresville, Statesville, Taylorsville and Salisbury communities..

In 2019 our efforts to serve Palliative Care patients with chronic illnesses showed decreased hospital encounters by 52%. Our Palliative Care program also accounts for 40% of our organization’s hospice admissions. This attests to the fact that we are striving to serve chronically ill patients before they are Hospice eligible as these patients need services and support while continuing to seek aggressive treatments.

Our Palliative Care patients are surveyed to ensure we meet their needs, and we make changes in our services to meet those needs. Currently the first three quarters of 2019 patient and family surveys reflect a 95.4% satisfaction score for Palliative Care services provided. Our current Palliative Care census is 410 patients.

5) Mission of HPCRC

Criterion (3) – G.S. 131E-183(a)(3) and G.S. 131E-183(b)

“The applicant shall identify the population to be served by the proposed project, and shall demonstrate the need that this population has for the services proposed, and the extent to which all residents of the area, and, in particular, low income persons, racial and ethnic minorities, women, handicapped persons, the elderly, and other underserved groups are likely to have access to the services proposed.”

Hospice & Palliative Care of Rowan County will serve all residents in Rowan County who need hospice and palliative services. This care will be provided regardless of ability to pay and without discrimination, which will increase access to care for low income persons, racial and ethnic minorities, women, handicapped persons, the elderly and other underserved groups. As a nonprofit, Hospice of Iredell has a long history of providing services for our community, regardless of a person’s ability to pay or other barriers. Last year, our organization contributed

\$1.6 million to cover uncompensated patient care costs and bereavement services thanks to generous fundraising efforts. Over the past five years, we have reinvested

nearly \$5 million in uncompensated patient care and community programs to ensure access to quality care for all who need it. This care includes our Rainbow Kidz Pediatric Grief Counseling program, which provides free in-school grief counseling for children across our county. We are dedicated to providing the same level of fundraising and community support in Rowan County. We consider giving back to be a cornerstone of our mission to provide extraordinary care to our patients, families and community.

In these written comments we covered five major strengths as to why Hospice & Palliative Care of Rowan County is most suited to receive the CON license: cost, license and location, quality, Palliative Care, and our mission. Our Board of Directors and leadership team at Hospice of Iredell County are prepared to move forward if granted the license to make a positive difference in the lives of residents in Rowan County facing a life-limiting illness.