

**PruittHealth Hospice – Salisbury
F-11952-20**

**Rowan County Hospice Home Care Office
Public Comments**

Pursuant to G.S. 131E-183(a)(1) and the 2020 SMFP, no more than one new hospice home care agency may be approved for Rowan County in this review. Because each application proposes to develop a new hospice home care office in Rowan County, all eight applications cannot be approved. Based on the following comparative analysis, the application submitted by PruittHealth Hospice - Salisbury should be approved and all other applications should be denied.

It should be noted that in the case of an appeal of the Decision of the Agency regarding the hospice home care office in Rowan County, PruittHealth Hospice – Salisbury reserves the right to provide additional comments against any of the seven applications even if the comments are not provided to the Agency during the public comment period.

COMPARATIVE ANALYSIS

1. Prior Experience Providing Hospice Home Care Services

For each applicant in this review, the following table compares the number of North Carolina Hospice Home Care Agencies owned or operated by the applicant and identified in the response to Section A 9.(a).

| Rank | Applicant | North Carolina Hospice Home Care Agencies |
|-------------|--------------------------------------|--|
| 1 | PruittHealth Hospice - Salisbury | 5 |
| 2 | Hospice of Iredell County | 3 |
| 3 | Amedisys Hospice | 1 |
| 3 | BAYADA Home Health Care | 1 |
| 3 | Carolina Caring | 1 |
| 4 | Adoration Home Health & Hospice | 0 |
| 4 | Continuum Care of North Carolina | 0 |
| 4 | Personal Home Care of North Carolina | 0 |

As shown in the table, three applicants do not currently provide hospice home care services in North Carolina, three applicants operate one hospice home care agency, and one applicant operates three hospice home care agencies in North Carolina; however, all three agencies are located in the same county. Only PruittHealth operates five hospice home care agencies in North Carolina and provides hospice home care services in over 70 counties in North Carolina.

2. Projected Access by Medicare Recipients

For each application in this review, the following table compares: a) the total number of days of care in Project Year 3; and b) the percentage of Medicare patient days of care in Project Year 3. Generally, the application projecting the highest number or percentage is the most effective alternative with regard to this comparative factor. The applications are listed in the table below in decreasing order of effectiveness.

| Rank | Applicant | Project Year 3 | | |
|------|--------------------------------------|--------------------|-------------------------------|---------------------------------|
| | | Total Days of Care | Medicare Patient Days of Care | % Medicare Patient Days of Care |
| 1 | PruittHealth Hospice - Salisbury | 23,100 | 22,267 | 96.4% |
| 2 | Hospice of Iredell County | 18,564 | 17,451 | 94.0% |
| 3 | Adoration Home Health & Hospice | 16,473 | 15,336 | 93.1% |
| 4 | Amedisys Hospice | 20,342 | 18,568 | 91.3% |
| 5 | BAYADA Home Health Care | 18,830 | 16,947 | 90.0% |
| 6 | Carolina Caring | 16,092 | 14,451 | 89.8% |
| 7 | Personal Home Care of North Carolina | 18,464 | 16,504 | 89.4% |
| 8 | Continuum Care of North Carolina | 15,074 | 13,265 | 88.0% |

3. Projected Access by Medicaid Recipients

For each application in this review, the following table compares: a) the total number of days of care in Project Year 3; and b) the percentage of Medicare patient days of care in Project Year 3 from data included in the table responding to Section L.4. Generally, the application projecting the highest number or percentage is the most effective alternative regarding this comparative factor. The applications are listed in the table below in decreasing order of effectiveness.

| Rank | Applicant | Project Year 3 | | |
|------|--------------------------------------|--------------------|-------------------------------|---------------------------------|
| | | Total Days of Care | Medicaid Patient Days of Care | % Medicaid Patient Days of Care |
| 1 | Continuum Care of North Carolina | 15,074 | 1,055 | 7.0% |
| 2 | BAYADA Home Health Care | 18,830 | 1,158 | 6.1% |
| 3 | Amedisys Hospice | 20,342 | 1,017 | 5.0% |
| 4 | Personal Home Care of North Carolina | 18,464 | 911 | 4.9% |
| 5 | Carolina Caring | 16,092 | 762 | 4.7% |
| 6 | Adoration Home Health & Hospice | 16,473 | 329 | 2.0% |
| 7 | PruittHealth Hospice - Salisbury | 23,100 | 231 | 1.0% |
| 7 | Hospice of Iredell County | 18,564 | 185 | 1.0% |

4. Projected Access by Charity Care Patients

For each application in this review, the following table compares charity care as a percentage of gross revenue projected by the applicants in Project Year 3 from charity care and gross revenues identified in Form F.4 Revenues. Generally, the application projecting the highest percentage of charity care is the most effective alternative regarding this comparative factor. The applications are listed in the table below in decreasing order of effectiveness.

| Rank | Applicant | Project Year 3 | | |
|------|--------------------------------------|----------------|---------------|--------------------------------------|
| | | Charity Care | Gross Revenue | Charity Care as a % Gross Revenue |
| 1 | Continuum Care of North Carolina | \$91,575 | \$3,430,637 | 2.7% |
| 1 | Adoration Home Health & Hospice | \$89,772 | \$3,297,918 | 2.7% |
| 3 | Hospice of Iredell County | \$69,791 | \$3,768,435 | 1.9% |
| 4 | Carolina Caring | \$58,539 | \$3,562,109 | 1.6% |
| 5 | PruittHealth Hospice - Salisbury | \$68,871 | \$4,558,273 | 1.5% |
| 6 | BAYADA Home Health Care | \$45,699 | \$4,157,844 | 1.1% |
| 7 | Personal Home Care of North Carolina | \$43,060 | \$4,377,033 | 1.0% |
| 8 | Amedisys Hospice | \$0 | \$3,372,808 | 0.0% |

5. Number of Patients Projected to be Served

The following table presents the number of patients each applicant projects to serve in Project Year 3, as stated in Section Q, Form C Utilization. Generally, the application projecting the highest number of patients to be served is the most effective alternative regarding this comparative factor. The applications are listed in the table below in decreasing order of effectiveness.

| Rank | Applicant | Project Year 3 |
|------|--------------------------------------|----------------|
| | | Patients |
| 1 | PruittHealth Hospice - Salisbury | 366 |
| 2 | Amedisys Hospice | 312 |
| 3 | Adoration Home Health & Hospice | 311 |
| 4 | Personal Home Care of North Carolina | 271 |
| 5 | Hospice of Iredell County | 269 |
| 6 | BAYADA Home Health Care | 266 |
| 7 | Carolina Caring | 247 |
| 8 | Continuum Care of North Carolina | 244 |

6. Number of Patients Projected to be Served

The following table presents the number of patients each applicant projects to serve and the total days of care to be provided in Project Year 3, as stated in Section Q, Form C Utilization. Generally, the application projecting the highest number of patients to be served and days of care is the most effective alternative regarding this comparative factor. The applications are listed in the table below in decreasing order of effectiveness.

| Rank | Applicant | Project Year 3 |
|------|--------------------------------------|----------------|
| | | Days of Care |
| 1 | PruittHealth Hospice - Salisbury | 23,100 |
| 2 | Amedisys Hospice | 20,342 |
| 3 | BAYADA Home Health Care | 18,830 |
| 4 | Hospice of Iredell County | 18,564 |
| 5 | Personal Home Care of North Carolina | 18,464 |
| 6 | Adoration Home Health & Hospice | 16,473 |
| 7 | Carolina Caring | 16,092 |
| 8 | Continuum Care of North Carolina | 15,074 |

7. Net Revenue per Day of Care

Net revenue per patient day is calculated by dividing the Project Year 3 net revenue by Project Year 3 total patient days of care. Generally, the application proposing the lowest net revenue per visit is the more effective alternative regarding this comparative factor. The applications are listed in the table below in decreasing order of effectiveness.

| Rank | Applicant | Project Year 3 | | |
|------|--------------------------------------|-------------------|---------------------|-------------------------------------|
| | | # of Patient Days | Net Patient Revenue | Net Patient Revenue per Patient Day |
| 1 | Amedisys Hospice | 20,342 | \$3,290,787 | \$161.77 |
| 2 | Adoration Home Health & Hospice | 16,473 | \$2,877,865 | \$174.70 |
| 3 | BAYADA Home Health Care | 18,830 | \$3,467,750 | \$184.16 |
| 4 | PruittHealth Hospice - Salisbury | 23,100 | \$4,416,470 | \$191.19 |
| 5 | Hospice of Iredell County | 18,564 | \$3,550,360 | \$191.25 |
| 6 | Continuum Care of North Carolina | 15,074 | \$2,894,193 | \$192.00 |
| 7 | Carolina Caring | 16,092 | \$3,408,166 | \$211.79 |
| 8 | Personal Home Care of North Carolina | 18,464 | \$4,021,394 | \$217.80 |

8. Cost per Day of Care

Cost per patient day is calculated by dividing the Project Year 3 projected total costs by Project Year 3 total patient days of care. Generally, the application proposing the lowest cost per patient day is the more effective alternative regarding this comparative factor. The applications are listed in the table below in decreasing order of effectiveness.

| Rank | Applicant | Project Year 3 | | |
|------|--------------------------------------|-------------------|-------------|----------------------|
| | | # of Patient Days | Total Costs | Cost per Patient Day |
| 1 | Adoration Home Health & Hospice | 16,473 | \$2,116,099 | \$128.46 |
| 2 | Amedisys Hospice | 20,342 | \$2,891,962 | \$142.17 |
| 3 | BAYADA Home Health Care | 18,830 | \$2,809,406 | \$149.20 |
| 4 | PruittHealth Hospice - Salisbury | 23,100 | \$3,464,548 | \$149.98 |
| 5 | Carolina Caring | 16,092 | \$2,526,015 | \$156.97 |
| 6 | Hospice of Iredell County | 18,564 | \$3,242,435 | \$174.66 |
| 7 | Continuum Care of North Carolina | 15,074 | \$2,645,094 | \$175.47 |
| 8 | Personal Home Care of North Carolina | 18,464 | \$3,705,979 | \$200.71 |

9. Net Revenue per Admission

Net revenue per admission is calculated by dividing the Project Year 3 projected net revenue by projected number of Project Year 3 unduplicated admissions provided in Section Q, Form C Utilization. Generally, the application proposing the lowest net revenue per admission is the more effective alternative regarding this comparative factor. The applications are listed in the table below in decreasing order of effectiveness.

| Rank | Applicant | Project Year 3 | | |
|------|--------------------------------------|----------------|-------------|---------------------------|
| | | Admissions | Net Revenue | Net Revenue per Admission |
| 1 | Adoration Home Health & Hospice | 263 | \$2,877,865 | \$10,942 |
| 2 | Amedisys Hospice | 273 | \$3,290,787 | \$12,054 |
| 3 | PruittHealth Hospice - Salisbury | 308 | \$4,416,470 | \$14,339 |
| 4 | BAYADA Home Health Care | 241 | \$3,467,750 | \$14,389 |
| 5 | Hospice of Iredell County | 238 | \$3,550,360 | \$14,917 |
| 6 | Continuum Care of North Carolina | 194 | \$2,894,193 | \$14,919 |
| 7 | Carolina Caring | 224 | \$3,408,166 | \$15,215 |
| 8 | Personal Home Care of North Carolina | 227 | \$4,021,394 | \$17,715 |

10. Benefits and Taxes

In recruitment and retention of personnel, taxes and benefits, as identified in Section Q, Form H Staffing, are a significant factor in addition to salaries. Generally, the applicant proposing higher taxes and benefits for salaries is the more effective alternative regarding this comparative factor.

| Rank | Applicant | Project Year 3 |
|------|--------------------------------------|----------------------|
| | | % Benefits and Taxes |
| 1 | Carolina Caring | 27.95% |
| 2 | Hospice of Iredell County | 27.0% |
| 3 | BAYADA Home Health Care | 25.0% |
| 4 | PruittHealth Hospice - Salisbury | 24.3% |
| 5 | Continuum Care of North Carolina | 22.0% |
| 6 | Personal Home Care of North Carolina | 21.0% |
| 7 | Adoration Home Health & Hospice | 20.0% |
| 8 | Amedisys Hospice | 18.0% |

11. Salaries for Key Direct Care Staff: RN, CNA / Aide, Social Worker

In recruitment and retention of personnel, salaries are a significant factor. The applicants provide the following information in Section Q, Form H Staffing. Generally, the application proposing the highest annual salary is the more effective alternative regarding this comparative factor. The applications are listed in the table below in decreasing order of effectiveness.

11a. Registered Nurse

| Rank | Applicant | Registered Nurse |
|------|--------------------------------------|------------------|
| 1 | BAYADA Home Health Care | \$84,272 |
| 2 | Personal Home Care of North Carolina | \$82,774 |
| 3 | PruittHealth Hospice - Salisbury | \$81,481 |
| 4 | Continuum Care of North Carolina | \$79,070 |
| 5 | Carolina Caring | \$78,797 |
| 6 | Amedisys Hospice | \$77,690 |
| 7 | Hospice of Iredell County | \$69,201 |
| 8 | Adoration Home Health & Hospice | \$67,626 |

11b. CNA / Aide

| Rank | Applicant | CNA / Aide |
|-------------|--------------------------------------|-------------------|
| 1 | Continuum Care of North Carolina | \$36,414 |
| 1 | BAYADA Home Health Care | \$36,414 |
| 2 | PruittHealth Hospice - Salisbury | \$34,503 |
| 3 | Hospice of Iredell County | \$32,470 |
| 4 | Adoration Home Health & Hospice | \$32,460 |
| 5 | Personal Home Care of North Carolina | \$31,836 |
| 6 | Carolina Caring | \$31,818 |
| 7 | Amedisys Hospice | \$29,311 |

11c. Social Worker

| Rank | Applicant | Social Worker |
|-------------|--------------------------------------|----------------------|
| 1 | BAYADA Home Health Care | \$67,626 |
| 2 | PruittHealth Hospice - Salisbury | \$64,437 |
| 3 | Continuum Care of North Carolina | \$62,757 |
| 4 | Amedisys Hospice | \$62,249 |
| 5 | Adoration Home Health & Hospice | \$60,593 |
| 6 | Personal Home Care of North Carolina | \$60,489 |
| 7 | Hospice of Iredell County | \$57,682 |
| 8 | Carolina Caring | \$56,531 |

13. Average Caseload: RN, Social Worker, Hospice Aide, Chaplain, Volunteer

In recruitment and retention of personnel, salaries are a significant factor. The applicants provide the following information in Section Q, Form H Staffing. Generally, the application proposing the highest annual salary is the more effective alternative regarding this comparative factor. The applications are listed in the table below in decreasing order of effectiveness.

12a. Registered Nurse

| Rank | Applicant | Registered Nurse |
|------|--------------------------------------|------------------|
| 1 | Personal Home Care of North Carolina | 9 |
| 2 | BAYADA Home Health Care | 10 |
| 2 | Continuum Care of North Carolina | 10 |
| 3 | Adoration Home Health & Hospice | 12 |
| 3 | Carolina Caring | 12 |
| 3 | PruittHealth Hospice - Salisbury | 12 |
| 4 | Hospice of Iredell County | 12.5 |
| 5 | Amedisys Hospice | 13 |

12b. Social Worker

| Rank | Applicant | Social Worker |
|------|--------------------------------------|---------------|
| 1 | Personal Home Care of North Carolina | 24 |
| 2 | BAYADA Home Health Care | 25 |
| 2 | Continuum Care of North Carolina | 25 |
| 3 | Hospice of Iredell County | 28.9 |
| 4 | PruittHealth Hospice - Salisbury | 30 |
| 5 | Adoration Home Health & Hospice | 31 |
| 6 | Carolina Caring | 35 |
| 7 | Amedisys Hospice | 45 |

12c. CNA / Aide

| Rank | Applicant | CNA / Aide |
|------|--------------------------------------|------------|
| 1 | BAYADA Home Health Care | 8 |
| 1 | Continuum Care of North Carolina | 8 |
| 2 | Hospice of Iredell County | 9.5 |
| 3 | Carolina Caring | 10 |
| 3 | Personal Home Care of North Carolina | 10 |
| 3 | PruittHealth Hospice - Salisbury | 10 |
| 4 | Amedisys Hospice | 11 |
| 5 | Adoration Home Health & Hospice | 13 |

12d. Chaplain

| Rank | Applicant | Chaplain |
|-------------|--------------------------------------|-----------------|
| 1 | Continuum Care of North Carolina | 25 |
| 2 | BAYADA Home Health Care | 35 |
| 2 | Personal Home Care of North Carolina | 35 |
| 3 | PruittHealth Hospice - Salisbury | 40 |
| 4 | Carolina Caring | 50 |
| 5 | Adoration Home Health & Hospice | 51 |
| 6 | Amedisys Hospice | 55 |
| 7 | Hospice of Iredell County | 57.5 |

12e. Volunteer

| Rank | Applicant | Volunteer |
|-------------|--------------------------------------|------------------|
| 1 | Personal Home Care of North Carolina | 1 |
| 2 | Carolina Caring | 2 |
| 2 | PruittHealth Hospice - Salisbury | 2 |
| 3 | BAYADA Home Health Care | 4 |
| 4 | Adoration Home Health & Hospice | 18 |
| 5 | Amedisys Hospice | 45 |
| 6 | Hospice of Iredell County | 49 |
| 7 | Continuum Care of North Carolina | 50 |

SUMMARY

The following table:

- 1) Presents the comparative analysis rankings for each of the eight applicants for the 12 identified factors,
- 2) Averages the rankings for the 12 factors, and
- 3) Ranks the eight applicants in decreasing order of effectiveness.

| Applicant | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11a | 11b | 11c | 11* | 12a | 12b | 12c | 12d | 12e | 12** | Total*** | Avg**** |
|--------------------------------------|---|---|---|---|---|---|---|---|---|----|-----|-----|-----|-----|-----|-----|-----|-----|-----|------|----------|---------|
| PruittHealth Hospice - Salisbury | 1 | 1 | 7 | 5 | 1 | 1 | 4 | 4 | 3 | 4 | 3 | 2 | 2 | 2.3 | 3 | 4 | 3 | 3 | 2 | 3.0 | 36.3 | 3.0 |
| BAYADA Home Health Care | 3 | 5 | 2 | 6 | 6 | 3 | 3 | 3 | 4 | 3 | 1 | 1 | 1 | 1.0 | 2 | 2 | 1 | 2 | 3 | 2.0 | 41.0 | 3.4 |
| Adoration Home Health & Hospice | 4 | 3 | 6 | 1 | 3 | 6 | 2 | 1 | 1 | 7 | 8 | 4 | 5 | 5.7 | 3 | 5 | 5 | 5 | 4 | 4.4 | 44.1 | 3.7 |
| Amedisys Hospice | 3 | 4 | 3 | 8 | 2 | 2 | 1 | 2 | 2 | 8 | 6 | 7 | 4 | 5.7 | 5 | 7 | 4 | 6 | 5 | 5.4 | 46.1 | 3.8 |
| Hospice of Iredell County | 2 | 2 | 7 | 3 | 5 | 4 | 5 | 6 | 5 | 2 | 7 | 3 | 7 | 5.7 | 4 | 3 | 2 | 7 | 6 | 4.4 | 51.1 | 4.3 |
| Continuum Care of North Carolina | 4 | 8 | 1 | 1 | 8 | 8 | 6 | 7 | 6 | 5 | 4 | 1 | 3 | 2.7 | 2 | 2 | 1 | 1 | 7 | 2.6 | 59.3 | 4.9 |
| Carolina Caring | 3 | 6 | 5 | 4 | 7 | 7 | 7 | 5 | 7 | 1 | 5 | 6 | 8 | 6.3 | 3 | 6 | 3 | 4 | 2 | 3.6 | 61.9 | 5.2 |
| Personal Home Care of North Carolina | 4 | 7 | 4 | 7 | 4 | 5 | 8 | 8 | 8 | 6 | 2 | 5 | 6 | 4.3 | 1 | 1 | 3 | 2 | 1 | 1.6 | 66.9 | 5.6 |

* 11 is the average ranking of 11a, 11b, and 11c.

** 12 is the average ranking of 12a, 12b, 12c, 12d, and 12e.

*** Total is the sum of 1+2+3+4+5+6+7+8+9+10+11*+12**.

**** Avg is the average ranking over the 12 comparative factors.