



North Carolina Department of Health and Human Services  
Division of Health Service Regulation

Pat McCrory  
Governor

Aldona Z. Wos, M.D.  
Ambassador (Ret.)  
Secretary DHHS

Drexdal Pratt  
Division Director

May 20, 2015

Robert A. Leandro  
301 Fayetteville Street Suite 1400  
Raleigh, NC 27601

**Exempt from Review – Acquisition of Facility**

Facility: Open Arms Retirement Center  
Type of Facility: Adult Care Home  
Acquisition by: Integrity-Raeford, LLC  
County: Robeson  
FID #: 010099

Dear Mr. Leandro:

The Healthcare Planning and Certificate of Need Section, Division of Health Service Regulation (Agency) determined that based on your letter of May 6, 2015, the above referenced proposal is exempt from certificate of need review in accordance with G.S 131E-184(a)(8). Therefore, Integrity-Raeford, LLC may proceed to acquire the above referenced health service facility without first obtaining a certificate of need. However, you need to contact the Agency's Adult Care Licensure Section to obtain instructions for changing ownership of the existing facility. Note that pursuant to G.S. 131E-181(b): "*A recipient of a certificate of need, or any person who may subsequently acquire, in any manner whatsoever permitted by law, the service for which that certificate of need was issued, is required to materially comply with the representations made in its application for that certificate of need.*"

It should be noted that this Agency's position is based solely on the facts represented by you and that any change in facts as represented would require further consideration by this Agency and a separate determination. If you have any questions concerning this matter, please feel free to contact this office.

Sincerely,

Tanya S. Rupp  
Project Analyst

Martha J. Frisone,  
Assistant Chief, Certificate of Need

cc: Adult Care Licensure Section, DHSR  
Assistant Chief, Healthcare Planning



**Healthcare Planning and Certificate of Need Section**

www.ncdhhs.gov

Telephone: 919-855-3873 • Fax: 919-733-8139

Location: Edgerton Building • 809 Ruggles Drive • Raleigh, NC 27603

Mailing Address: 2704 Mail Service Center • Raleigh, NC 27699-2704

An Equal Opportunity/ Affirmative Action Employer





**Robert A. Leandro**  
**Partner**  
Telephone: 919.835.4636  
Direct Fax: 919.835.4614  
robbleandro@parkerpoe.com

Charleston, SC  
Charlotte, NC  
Columbia, SC  
Raleigh, NC  
Spartanburg, SC



May 6, 2015

**VIA U.S. AND ELECTRONIC MAIL**

Martha Frisone  
Assistant Chief  
Healthcare Planning and Certificate of Need Section  
North Carolina Department of Health and Human Services  
2704 Mail Service Center  
Raleigh, NC 27699-2704  
Martha.Frisone@dhhs.nc.gov

FID 010099

Re: Request for No Review Determination

Dear Ms. Frisone:

This letter is intended to provide notice to the Certificate of Need Section ("CON") that Integrity-Raeford, LLC is planning to acquire the adult care home licensed as Open Arms Retirement Center (HAL-047-009) which is located at 612 Health Drive, Raeford, NC 28376.

Integrity-Raeford, LLC intends to acquire this facility through an asset contribution and expects that this transaction will close no earlier than May 29, 2015. Integrity-Raeford, LLC requests that the CON Section confirm that this application is not subject to CON review under N.C. Gen. Stat. § 131E-1848A and issue a written determination so that the change of ownership may proceed without review.

I greatly appreciate your attention to this matter. Please call me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rw Leandro'.

Robert A. Leandro

PPAB 2795248v1