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Submitted electronically
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Martha.Frisone@dhhs.nc.gov

North Carolina Division of Health Service Regulation
Healthcare Planning and Certificate of Need Section
2704 Mail Service Center
Raleigh, NC 27699-2704

RE: Formal Comments – Special Certificate of Need (CON) determination for Wake County

Dear Ms. Martha Frisone,

Thank you for the opportunity to submit formal comments on the special CON determination for Wake County. BAYADA opposes the approval of the special CON determination for Wake County.

BAYADA is celebrating its 41st year and has a 27-year history of providing quality in-home services across North Carolina. In 2015 with 53 offices, employing more 8,277 staff -including registered nurses, licensed practical nurses, certified nursing assistants, nurse aides, habilitation technicians, social workers, therapists, and office personnel, and caring for 16,441 acute and long-term care seniors, disabled adults, and medically fragile children across North Carolina - we have a track record of providing quality home health care services to help inform these comments.

- **Sufficient access to care exists.** There are sufficient agencies in Wake County who specialize in pediatric services. As one of the largest providers in NC, we serve the needs of infants and children in Wake County and across the state. There are no waiting lists or delays in care delivery for children who require nursing services at home under Medicaid Private Duty Nursing or the Community Alternatives Program for Children (CAP-C). Further, the Medicaid Home Health benefit is very limited making it very difficult for the services outlined in the petition to be coverable. Home health is generally short-term acute services (typically 1-3 therapy visits), which would make it very difficult for the petitioner to meet the child's health care needs. Those children are generally enrolled into a case managed waiver programs, which falls outside the CON.
- **Services may be duplicative.** Many of the educational and supportive mother/child services that are mention in the petition are currently offered for free by the Nurse-Family Partnership Program. <http://www.wakegov.com/humanservices/family/maternal/nurse/pages/default.aspx>



- **Expansion may dilute the existing nursing pool.** Adding another provider to the roster may dilute the nursing pool of qualified pediatric nurses. This dilution of staffing may make it more difficult for families to get the care they need at home.

Health care services delivered in the home are cost effective and patient-preferred. While coping with serious illness, disability, or chronic disease, helping people have a safe home life with comfort, independence, and dignity is part of *The BAYADA Way, our company philosophy and mission.*

We appreciate the opportunity to comment on this CON determination. Should you have any questions my direct line is 919-523-2992.

Sincerely,

A handwritten signature in black ink, appearing to read "Lee Dobson".

Lee Dobson, M.PA, CPHQ
Area Director, Government Affairs