

From: [Tina Glenn](#)
To: [DHSR.SMFP.Petitions-Comments](#)
Cc: [Contact: Roget DePercin Berendes](#)
Subject: [External] No encrypt. Strongly opposed to the Leading Age CCRC Petition
Date: Sunday, March 18, 2018 8:46:25 PM

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We are strongly opposed to the petition put forth by Leading Age, proposing that CCRCs be exempt from needing a CON to provide Home Health services to the residents of the 69 CCRC campuses in North Carolina.

This spits in the face of logic and reasoning and opens the door for other damning actions against the CON process - such as, if this is allowed, then what is to prevent, but rather to encourage CCRCs, to build hospitals, outpatient surgery centers, and hospice operations on their campuses, all outside of the CON process?

The CON process is largely about ensuring good access and quality of care, with the SHCC being one of the good stewards of sound, public health policy. Further, if a Home Health exemption is granted, it's not just about only serving CCRC residents; given the thresholds required for home health; these campuses will quickly see that the home health operation can not rely only upon those residents!

CCRCs are able to compete for new CONs or acquire CONs just like any other provider can. So why don't they then?

There are no access or quality of care problems on the CCRC campuses. Residents of these campuses already receive home health care services from numerous home health care providers, and there are no access problems.

This petition to the SHCC is all about greed. They want to limit competition on their campuses and reduce the number of providers on their campuses, thereby restricting choice!

A while back, we saw one CCRC in the state acquire a new home care license to serve private duty home care services. The area the campus is situated in was already glutted with private duty home care providers, already capably providing private duty services to the campus's residents.

Please deny the petitioner's request.

Respectfully submitted,

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