

**From:** [Mary McCaffrey-Murphy](#)  
**To:** [DHSR.SMFP.Petitions-Comments](#)  
**Subject:** [External] petition to change policy to Exempt CCRCs from need determination to establish Medicare Certified Home Health Agency  
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**Attachments:** [image001.png](#)

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I am in support of a proposed change in policy which would include an exemption to the State Medical Facilities Plan Need Projection for Home Health Agencies (Chapter 12), for CCRCs that wish to license and implement a Medicare Certified Home Health Agency, and to service exclusively the individuals with whom the CCRC has a continuing care contract and not the general population. This petition asks for the addition of language specific to qualified CCRCs that would allow them from the outset of a new community, or the addition to an existing community, to add a licensed Medicare Certified Home Health Agency, without regard to the need determination shown in Chapter 12. To qualify for the proposed exemption, applications for certificates of need shall show that the proposed Medicare Certified Home Health Agency will only be licensed for the following levels of care: independent living, licensed adult care home beds, and licensed nursing care beds. In addition, the proposed language in the petition indicates that licensed CCRCs could provide services to meet the needs of people only with whom the facility has continuing care contracts.

I am a nurse practitioner that is employed by Croasdaile Village, a CCRC in Durham North Carolina. We have independent living, assisted living, and skilled nursing levels of service all on one campus. Croasdaile Village is committed to providing a seamless continuity of care for the age-related health services of its life-care resident population. With the increased popularity of home and community based care, Croasdaile Village, and the broader CCRC community, continue to see the need for the provision of Medicare Certified Home Health within the post-acute care environment. Currently, our residents have to secure needed services from third-party providers. This petition would provide a path for Croasdaile Village to establish a Medicare Certified Home Health Agency which will allow us to better provide for our residents with home health needs. Resident choice will always be highly important for the provision of health services. This exception would allow Croasdaile Village to offer an additional option for care, from which the resident may choose. I believe home health care can be a significant savings to Medicare, when compared to skilled nursing facility care.

I am fully supportive of this petition for a change in policy relative to Home Health Agencies for CCRCs for the 2019 State Medical Facilities Plan.

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