

PETITION

Hospice & Palliative CareCenter dba Trellis Supportive Care Petition for Adjustment to the Proposed 2020 SMFP Rowan County Hospice Home Care Office Need Determination

Petitioner:

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Statement of Requested Adjustment

Hospice & Palliative CareCenter dba Trellis Supportive Care (Trellis) requests that the 2020 State Medical Facilities Plan (SMFP) identify a need determination for zero (0) additional hospice home care offices in Rowan County, as reflected in Table 13B.

Background

Table 13B in the Draft 2020 State Medical Facilities Plan identifies a need determination for one hospice home care office in Rowan County. This need determination is based on projected 2021 county deaths and projected 2021 hospice deaths served, using utilization data from the Hospice Annual Data Supplement to the License Renewal Application. The supplement data used in the 2020 SMFP reflects hospice activity through the period ended September 30, 2018.

Trellis has operated a licensed hospice home care office in Rowan County since 2004. Beginning in 2010, hospice services under this license were provided through Rowan Hospice & Palliative Care LLC (RHPC), which was a joint venture with Novant Health. Effective August 1, 2018 Novant Health withdrew from the joint venture and began serving Rowan County residents as an independent hospice, while Trellis continued operating RHPC as a subsidiary, but under a new name.

Reason for the Proposed Adjustment

Trellis Supportive Care believes that it is unnecessary to maintain a need determination for an additional hospice home care office in Rowan County for 2021 in order for county residents to have sufficient access to care. As shown in the State Medical Facilities Plan, residents have been able to choose from among 18 to 20 hospice licensed operations every year for the last four years, with 15 individual provider entities reporting activity in the draft 2020 SMFP. In addition the separation of Novant Health from RHPC and the change of RHPC's name to Trellis Supportive Care - Rowan in 2018 resulted in the introduction of two hospice provider identities to the local market shortly before the closure of the 2018 License Renewal Application data reporting period. Recognizing that volume projections for new

providers typically include a ramp-up period to stable volume levels, the data for the 2018 period would not have captured full operations for these re-established providers in that market. Additionally, with the high number of providers caring for Rowan County patients, there does not appear to be a lack of access to care, or a shortage of providers willing to serve that market. We have also noted that no providers have submitted petitions for additional licenses over the last five years based on data shared on the NC Division of Health Service Regulation Healthcare Planning and Certificate of Need Section website.

Adverse effect on providers and consumers without adjustment

Trellis believes that the addition of a licensed home care office in Rowan County will have an adverse effect on both consumers and providers if not adjusted. Over the course of the last four years, as documented in the SMFP for each year, from 18 to 20 licensed hospices have provided care to residents of Rowan County. The 2018 change created additional choices for consumers and referral sources, and the addition of another new hospice home care provider in the local market could create additional confusion which could create delays in accessing services helpful to both patients and families at a difficult time.

Alternatives considered

The alternative to considering this proposed adjustment would be to not submit a request for an adjusted need determination. However due to the potential adverse effect noted above a decision was made to request the adjustment.

Evidence that the proposed adjustment would not result in unnecessary duplication of health services in the area:

Removing the need determination for one additional hospice home care office in Rowan County will not contribute to unnecessary duplication of health services.

Evidence that the requested adjustment is consistent with the three Basic Principles governing the development of the North Carolina State Medical Facilities Plan: Safety and Quality, Access and Value:

The proposed adjustment is consistent with these basic principles in that safety and quality, access and value, all of which are associated with the existing provision of hospice home care services in Rowan County, will not be impacted. Hospice home care services in North Carolina are provided wherever the patient resides and are not limited by county lines. Based on the data presented in the Draft 2020 SMFP there are numerous hospice providers serving residents of Rowan County; several of these providers serve from licensed hospice home care offices located in surrounding counties but accessible to Rowan County. Consumers accessing information on the Medicare Hospice Compare website will find data reported on fifteen (15) providers for Salisbury, NC (in Rowan County) with high quality care already available among existing providers. The proposed adjustment will not reduce the ability of these providers to continue to provide services to Rowan County residents.