

Public Hearing Presentation
Petition for an Adjusted Need Determination for One Medicare-Certified
Home Health Office in Buncombe County

Good afternoon. My name is Lena Trejbal and I am a Division Director with BAYADA Home Health Inc. Ladies and Gentlemen of the State Health Coordinating Council, thank you for your service and for being in attendance at this public hearing today.

BAYADA Home Health will be submitting a petition for an adjusted need determination for one Medicare-certified home health office in Buncombe County. The factors that support this request include the effects of the COVID-19 pandemic combined with unique characteristics of this service area.

BAYADA currently has nine Medicare-certified home health offices, 32 home care offices and one hospice home care agency in North Carolina. In 2019, BAYADA transitioned to become a nonprofit company, protecting the organization from sale and providing security for employees and clients alike. BAYADA's status as a nonprofit company provides stability and enables the company to have greater resources for recruiting and maintaining excellent staff as compared to most other home health providers. The BAYADA home care office in Asheville routinely receives two to three calls per week with requests for skilled home health services that would require a Medicare-certified home health office.

BAYADA supports the standard home health need methodology and the overall Certificate of Need and Healthcare Planning process. Consistent with the planning process of the State Medical Facilities Plan, we have this opportunity to submit a petition for an adjusted need determination due to the special attributes of the Buncombe County service area that differ from those provided by the standard methodologies and policies.

The methodology functions well throughout the other service areas across the state that don't have the unique factors that are present in Buncombe County.

Justification for the requested adjusted need determination is outlined as follows:

- The standard need methodology for home health offices in the 2022 SMFP calculates a projected deficit of 125.42 patients that is likely understated due to the impact of COVID-19 and the exceptional characteristics of Buncombe County.
- Buncombe County is dissimilar to the other counties in the region in terms of a much greater population, larger geographic area and higher average annual rates of change in home health use rates per 1000 patients.
- BAYADA's methodology and assumptions demonstrate a projected deficit of 488 patients based on the home health annual change in use rates per 1000 population specific for Buncombe County. These rates are significantly higher for Buncombe County as compared to the much less populous counties in its assigned region.
- The US Census Bureau reports that 20.5 percent of the population in Buncombe County is over the age of 65, which is the highest percentage of any of the largest counties in our state.
- With the seventh largest population in the state, Buncombe County is vulnerable to access barriers because it has only two existing home health offices within the county; it also has the fewest home health offices per 100,000 residents of any county of comparable size in the state.
- Western North Carolina has mountainous geography and greater potential for inclement weather than most areas of the state; this coupled with the COVID-19 pandemic create barriers to access for patients.
- Natural disasters, pandemics and the cyberattacks are genuine threats to any healthcare provider's capability to deliver services.

- The two existing home health offices located within Buncombe County serve extraordinarily high numbers of patients. However, only one of these home health offices demonstrated increased utilization last year to accommodate higher demand.
- Having more than two home health provider options in such a large and high population county provides an opportunity to expand access and improve emergency preparedness to respond to the heightened risk of disasters.
- It is unlikely that home health providers from outside of Buncombe can improve access in Buncombe County because home health deficits are projected in the Proposed 2022 Plan for Henderson, Madison and Yancey Counties. In addition, the mountainous terrain and inclement weather can cause travel delays for staff from the other smaller and more distant home health offices.
- There have been no need determinations for additional home health offices in Buncombe County for at least the past 15 years.

Existing home health agencies cannot guarantee that they can continually add staff and expand services to keep pace with demand because COVID-19 exposures require staff to be quarantined.

This request for an adjusted need determination for one Medicare-certified home health office in Buncombe County would not cause unnecessary duplication of services because this service area has the fewest home health offices of any North Carolina county of similar size.

The BAYADA petition will address the adverse effects if the request is not granted. Also, our petition will explain the alternatives considered and how the requested change is consistent with the Basic Principles.

In closing, I want to reiterate that BAYADA supports the standard methodology for home health as well as the overall Certificate of Need and Healthcare Planning process. Thank you for the opportunity to present this petition that is based on the unique circumstances of the Buncombe County service area.

I will be glad to answer questions.