

July 21, 2022

North Carolina Division of Health Service Regulation  
Healthcare Planning  
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[DHSR.SMFP.PETITIONS-COMMENTS@DHHS.NC.GOV](mailto:DHSR.SMFP.PETITIONS-COMMENTS@DHHS.NC.GOV)

**RE: 2023 SMFP: Summer Petitions: Home Health Methodology (Brunswick, Granville, New Hanover, Onslow, and Robeson)**

To whom it may concern,

The purpose of this petition is to provide public comment regarding the methodology for determining home health needs for the 2023 SMFP draft plan.

Having provided over 30 years of private duty services to the residents of Brunswick, Granville, New Hanover, Onslow, and Robeson, I submit to you that the methodology used in the plan is adequate. I am providing personal witness as a provider of home private-duty services that the residents of these counties need more home health agencies.

In providing private duty services, we frequently experience our clients needing skilled nursing services, and often we bear the responsibility of communicating with the adult children when we encounter a decline in their parent's active skills. Therefore, our experience is that the skilled home health need is rising as many of the clients are anxious about being exposed to COVID and prefer the safety of their homes.

In that regard, I would like to reiterate that I agree with the current methodology for determining the need for 2023 SMFP, but I would also encourage your staff to develop new assumptions for home health needs as we find a drive in the healthcare industry for medical services being provided at home (i.e., telemedicine, home in-patient beds, home infusion services, home medical devices, and physician house calls, to name a few) – all of which will drive home health and hospice needs in the industry.

Sincerely yours,

*Lou Byrd*

Lou Byrd  
President

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