



August 8, 2023

DHSR SMFP.Petitions-Comments@dhhs.nc.gov
North Carolina Division of Health Service Regulation
Health Planning
2704 Mail Service Center
Raleigh, NC 27699-2704

Dear Madams and Sirs:

With approximately forty years of service to our communities across central North Carolina, AuthoraCare Collective is a not-for-profit hospice, palliative care, and advanced illness organization committed to empowering our patients and families to be active participants in their care journeys and enabling them to live on their own terms through personalized support for mind, body, and spirit. With close to five hundred team members and over one hundred volunteers, we are committed to helping our patients and families author more moments that matter, regardless of the stage of their illness or condition.

AuthoraCare Collective is a strong supporter of the SMFP process and North Carolina's Certificate of Need regulations. We firmly believe that the state's Certificate of Need regulations provide vital safeguards and parameters to ensure access to quality care for all populations while preventing unnecessary and costly duplication of services. We recognize the important work of the state's planning staff in developing the annual SMFP across various health care sectors.

AuthoraCare understands that there has been a special needs hospice petition filed by Heart and Soul for Mecklenburg County. Upon reviewing hospice access and services in this county, we noted that this county is currently serviced by at least 24 licensed hospice home care agencies, all of which serve African Americans and many with specific initiatives to increase access or promote health equity. We believe the standard need methodology ensures a sufficient number of hospices in Mecklenburg County and all 100 North Carolina counties and ensures these hospices provide quality, cost-effective care.

Our state association, the Association of Home and Hospice Care of North Carolina, actively supports continued efforts to improve health equity for all North Carolinians, including hospice patients. As a hospice organization in the state, we are engaged in initiatives to increase hospice utilization among historically underserved populations, including African Americans. This is an important part of our mission. We are aware of many other hospices who are also working on these complex issues and needs.

The petition by Heart and Soul requests an additional need determination in Mecklenburg County without demonstrating that the methodology is flawed or fails to provide sufficient access to



authoracare.org  800.588.8879

Burlington | 336.532.0100 | 914 Chapel Hill Rd, Burlington, NC 27215

Greensboro | 336.621.2500 | 2500 Summit Ave, Greensboro, NC 27405

Formerly Hospice & Palliative Care Center of Alamance-Caswell & Hospice and Palliative Care of Greensboro

hospice. The petition is premised on the notion that a hospice owned and operated by a sub-population could better serve that sub-population. However, the petition fails to provide any support for this premise. Additionally, the petitioner's limited experience in other states does not provide such evidence. If the petition were approved, it would provide no assurance that the petitioner would receive the Certificate of Need.

Authoracare respectfully requests that this petition be denied in the same way that a similar petition was denied in 2017.

Thank you for the opportunity to provide these comments and for the important work of the SHCC and DHSR's leadership and staff with the development and oversight of the SMFP's process.

Sincerely,

A handwritten signature in black ink that reads "Kristen Yntema". The signature is written in a cursive, flowing style.

Kristen Yntema
President/CEO
AuthoraCare Collective