

Long-Term & Behavioral Health Committee
Agency Report for Petition Regarding
W & B Health Care, Inc.–Adult Substance Abuse (Chemical Dependency) Beds
Proposed 2012 State Medical Facilities Plan

Petitioner:

W & B Health Care, Inc.
130 South Main Street
Red Springs, NC 28377

Request:

As stated by the petitioner: “W & B Health Care, Inc is writing this letter to petition an adjustment to the need determination for a Substance Abuse Residential/Rehabilitation Treatment Facility in the Southeastern Regional area. Recently, W & B Health Care, Inc submitted a Letter of Intent to the Certificate of Need Division, in request to provide Substance Abuse Residential/Rehabilitation Treatment services in the Robeson County area.”

The petition is for Adult beds only.

Background Information:

Chapter 2 of the Plan allows petitioners each calendar year to request adjustments to need determinations as shown in the Proposed Plan. Approving the additional beds requested for the Southeastern Regional LME/Robeson County area would constitute an adjusted need determination due to unique or special attributes of this particular geographic area.

Substance Abuse Services are categorized as Child/Adolescent (0-17 years) or Adult (18+ years). This level of Substance Abuse (chemical dependency) residential and inpatient hospitalization service is per North Carolina Administrative Code; 10A NCAC 27G, Sections .3400 and .6000 which provide 24-hour active treatment and a structured living environment for individuals in a group setting. Patients must be detoxified before entering for treatment. Both state facilities and independent providers offer this level of service, currently providing a total of 890 beds statewide. Most of the available beds provide the Adult level of service.

In the State Medical Facilities Plan (SMFP), initial need determinations for Substance Abuse Services are residential. If need determinations are reallocated, they can then be residential or inpatient hospitalization. Need is determined by Mental Health Planning Region. Each of the 4 Mental Health Planning Regions is comprised of 5 to 7 Local Management Entities (LME). Each LME is responsible for managing Mental Health Services to counties assigned to its authority/catchment area. Each LME may be comprised of one county or of multiple counties.

The Southeastern Regional LME includes the counties of Bladen, Columbus, Robeson, and Scotland. It is part of the South Central Region. The South Central Region encompasses five LMEs: Cumberland, Johnston, Sandhills, Southeastern Regional and Wake.

In the standard methodology, estimated Days of Care for all Age Groups by LME are provided for the most recent year available, and then projected two years forward. An occupancy level goal of 85 percent is established by utilizing the projected Days of Care, population estimates and Planning Inventory to determine unmet total need for all Age Groups. Nine percent of the total projected need is then established as need for Child/Adolescent services, with the remaining 91 percent of the projected need established for Adult services.

Analysis/Implications:

The petitioner states: “This request was in order for our agency to provide a continuum of care to our Substance Abuse Comprehensive Outpatient Treatment (SACOT) consumers in need of a more intense substance abuse recovery program, as well as offer these services to individuals that are court-ordered to cooperate with inpatient Substance Abuse treatment, but lack the desire to be placed in a facility outside of the catchment area.”

Petitioner then states: “it has been our experience that individuals in this area that are court ordered for substance abuse inpatient services are frequently placed on a waiting list due to no immediate, available placements. As a result, the individuals often lose interest in treatment and do not fully execute the court order, resulting in jail time or involuntary commitments into psychiatric units,” and “When the individuals return to their communities without appropriate treatments, the chances of continued drug use and crime rates increase resulting in the over loading of our court system, over-crowding of our jails and psychiatric units and the increased risk of the families that suffer due to substance abuse.”

The Agency has been unable to ascertain from the petition how the above statements are quantified by the petitioner and measurable for evaluation of necessity in support of the adjusted need request. Additionally, the petitioner does not identify how many Adult Substance Abuse beds are being requested.

The Agency has asked the petitioner to specify the number of Adult Substance Abuse beds being sought and to provide supportive data in order for staff to evaluate the necessity of the proposed services. To date, the petitioner has not provided this information.

The table which follows displays the Southeastern Regional LME’s Adult Substance Abuse services need projections from the 2008 to the 2012 Proposed Plan by plan year. The South Central Region, which is comprised of Southeastern Regional LME and the aforementioned 4 other LMEs, per the Methodology, is the official Service Area for need in the Plan:

SMFP (Plan) Year	Southeastern Regional LME Adult Bed Deficit	South Central Region Adult Need	SMFP South Central Region Adult Need Applied For (Yes/No)
2008	8	6	No
2009	11	9	No
2010	9	3	No
2011	9	0	N/A
Proposed 2012	7	0	N/A

The table above shows that the Southeastern Regional LME, which includes Robeson County, continues to have bed deficits for Adult Substance Abuse services, whereas the South Central Region from 2008 to 2010 had need for Adult services, but no applications were received. In the 2011 Plan and the Proposed 2012 Plan, no need was shown for the South Central Region.

The table below displays Southeastern Regional LME’s total Days of Care by Plan year and Robeson County’s Adult Substance Abuse services Days of Care as a percent of the total Southeastern Regional LME’s Days of Care. Days of Care are based on patient origin of residents (*i.e.*, where residents are from), not the location of services performed:

SMFP (Plan) Year	Southeastern Regional LME Days of Care	Robeson County Adult Days of Care and % of Total LME Days of Care
2010	2,962	1,889 / 64%
2011	3,163	1,653 / 52%
Proposed 2012	2,310	1,563 / 68%

The preceding table displays a reduction in the total Days of Care for Southeastern Regional LME for both Adult and Child services, whereas patient origin of residents from Robeson County obtaining Adult services has ranged from 52 percent to present draft number of 68 percent of all Substance Abuse services performed for the entire Southeastern Regional LME.

For the South Central Region, the current Proposed 2012 Plan numbers (projected to 2014) indicate an anticipated surplus of 25 Adult Substance Abuse services beds for this Region. This projected surplus is due to the Wake County LME having a draft surplus of 34 Adult services beds. These beds are not readily accessible to residents of the Southeastern Regional LME.

The next table displays the projected Bed Deficit/Surplus and the projected Planning Region Adult Services need for 2014 for LMEs contiguous to the Southeastern Regional LME (*as shown in the Proposed 2012 SMFP*):

LME	Proposed 2012 Adult Services Bed Deficit/Surplus (-) means Deficit	Proposed 2012 Adult Services Region Need
Cumberland	0	0
Eastpointe*	-3	0
Sandhills	-2	0
Southeastern Center*	38	0

** indicates LME’s that are not part of the South Central Region, but contiguous in location to the Southeastern Regional LME.*

The Inventory for this Chapter of the Plan shows that the Southeastern Regional LME, as well as six other LMEs throughout North Carolina, lacks any Adult and Child/Adolescent Substance Abuse (Chemical Dependency) beds for this level of service.

It should also be noted that there are a number of Substance Abuse Programs which are not covered under Certificate Need Law, and therefore, not part of the Plan. Examples include but are not limited to: Outpatient (Intensive and Comprehensive), Detoxification, DUI/DWI, methadone maintenance & detoxification, buprenorphine services, partial hospitalization/Day Treatment, halfway-house, short term and long term residential and dual diagnosis (MI & Substance Abuse) combined treatment programs.

For example, using Lumberton (the county seat of Robeson County) as the focal point, the Substance Abuse & Mental Health Services Administration of the U.S. Department of Health and Human Services has identified approximately 158 facilities within a 100 mile radius, 35 facilities within a 50 mile radius, and 6 facilities within a 20 miles radius, which provide different types and levels of Substance Abuse treatment services.

Agency Recommendation:

The petitioner requests an adjusted need determination due to unique or special attributes of this particular geographic area. However, the petition is incomplete as the petitioner has not quantified how many Adult Substance Abuse beds they are seeking, nor has the petitioner, at the request of the Agency, provided supporting information to document the necessity of the requested adjusted need determination.

Since the petition is incomplete and there is a pattern of declining Adult Substance Abuse services bed need for the Southeastern Regional LME, coupled with evidence of a variety of types of Substance Abuse Services available within the region of North Carolina where Robeson County is located, the Agency recommends that the Petition be denied.