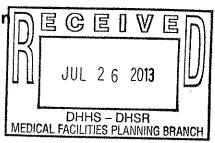
# Presentation of Special Needs Petition to Remove Home Health Agency Granville County,

Proposed 2014 State Medical Facilities Plan

Charlotte, July 26, 2013



### Introduction

Thank you. Good afternoon, my name is Lisa Harrison I am Health Director for the Granville-Vance District Health Department. I am also Director of the Granville-Vance Home Health Agency. One county, Vance has just over 45,600 people. Granville has 56,800. The two-county District has one home health agency office, which is located in Vance County.

## Request

I am here to ask members of the State Health Coordinating Council to modify the Proposed 2014 State Medical Facilities Plan (2014 SMFP) to include a special need to remove need for a new Medicare Certified Home Health Agency/Office in Granville County. This would be a modification to Chapter 12 of the SMFP, specifically addressing the Granville County service area.

#### Reasons

Until 2009, the office was located in Granville County. We moved 15 miles to take advantage of a good office lease, not realizing the planning consequences.

Granville is well served with home health agency services. In fact, Table 12C of the Proposed 2014 State Medical Facilities Plan shows that the 17 agencies that currently serve the county will have excess capacity in 2015. It shows they will serve an excess of 50 county residents.

The need in Proposed Plan Table 12D is generated, not by need, but by a technicality in Policy HH-3, that automatically inserts need for a new home health agency/office in a county that has more than 20,000 residents and no home health agency office. When the policy was written, our office was in Granville County. In 2009, when we moved the office 15 miles away, neither we nor the DHSR Planning staff realized that Policy HH-3 would trigger a need for another home health agency. It was not until 2013, when in a systematic check, Planning Section staff followed the Policy that a need appeared in the Proposed Plan.

Granville is a rural county. The largest town, Oxford, has 8,500 people. It consists of farmland, lakes and small towns. Drive I-85 North and you will see. The health department has offices in both Oxford and in Henderson (Vance County). Population of Henderson is not much bigger than Oxford; it is 15,300. Our Henderson office is only four miles from the Granville County line. In our case, clearly, office location does not affect patient access. Seventeen agencies serve Granville County, but Granville-Vance Home Health Agency serves the most Granville County patients. We serve twice as many people as our next nearest competitor, Duke. We serve more patients from Granville than from Vance County. According to the Proposed 2014 Plan, Granville County home health use rates are close to the state average.

Our home health agency staff members live in both counties. They are assigned geographically, so that they can provide continuity of care between home health and other community support services.

Our office has historically moved back and forth between the two counties.

#### **Alternatives**

If you leave the need in the Plan, you will add unnecessary competition to a rural Safety Net Provider. As it is, we have more than a fair share of uncompensated and Medicaid patients; last year almost 20 percent of our patients were Medicaid beneficiaries. I have just taken over as Health Director and we are investing substantial energy and resources in strengthening the agency. I expect you will see even better service next year.

It would be unfortunate to add capacity that is not needed It would compromise our ability to serve underserved groups, while adding little value to the community. A new agency would only shift service around.

A better alternative is to accept our special need petition and show no need for a new home health agency office in Granville County in the 2014 State Medical Facilities Plan.

This will solve the immediate problem. In next year's planning cycle, for the 2015 Plan, the SHCC may want to revisit the Policy. As written, HH-3 would automatically insert a need for a new home health agency office every year. For the 2015 Plan, you may want to consider how the policy affects the Granville-Vance District and add wording to

recognize Granville - Vance Home Health Agency as a single home health district provider that functions in two counties whose centers are only 15 miles apart.

## **Evidence of Non-Duplication**

As noted, Granville County is so well served that the Plan shows a surplus of home health agency service in 2015.

## **Benefit and Quality**

Removing the need will give us time to strengthen the agency and free resources that we will otherwise have to invest in proposing another office for the district. A consolidated office is more efficient to operate.

I ask that you help us and approve this request. I will be submitting a formal petition in the required format later this month. Meanwhile, I will be happy to respond to any of your questions today.