



Catharine W. Cummer
Regulatory Counsel, Strategic Planning

August 14, 2014

Via Email

Nadine Pfeiffer
North Carolina Division of Health Service Regulation
Medical Facilities Planning Branch
2714 Mail Service Center
Raleigh, NC 27699-2714

Re: Duke University Health System Comments Regarding Home Health Agency
Petitions

Dear Ms. Pfeiffer:

Duke University Health System, Inc. d/b/a Duke Home Health submits these comments in response to two petitions for adjusted need determinations regarding the provision of home health services in Wake, Durham, and Orange Counties.

Triangle Orthopaedic Associates, PA has filed a petition for an adjusted need determination need for a Medicare-certified home health agency “committed to coordinating post-acute care with an orthopaedic surgery program.” Duke recognizes and supports the value of coordinating acute and post-acute care for surgical and other complex patients, both to improve patient outcomes and to reduce overall healthcare costs and variations, including the provision of bundled payment services. To this end, Duke operates a home health agency serving patients across several counties, including Wake, Orange, and Durham Counties, which has developed expertise in the post-surgical care of orthopaedic patients. This specialized home-based care is also coordinated with the other care patients may require for their co-morbidities. There are 20 home health agencies based in Durham, Orange, and Wake County (and others with patients in those counties); many of these may also have developed this kind of specialized care to reduce complications and readmissions.

Duke welcomes the opportunity to collaborate with Triangle Orthopaedic Associates or any other practice to provide coordinated care for bundled services and more broadly to enhance the continuity of care for post-surgical patients through its existing home health agency. Coordination with an existing home health agency with the necessary expertise could allow Triangle Orthopaedic Associates or other surgical practices to achieve their goals without duplicating existing services.

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Separately, Myriad Homecare Agency has petitioned for an adjusted need determination for an additional home health agency in Wake County to address the needs of the Hispanic-Latino population. Duke, WakeMed, and Rex all operate home health services in Wake County coordinated with their hospitals, among a total of 28 Medicare-certified agencies currently treating patients in Wake County. Many, if not all, of these agencies including Duke have significant experience in working with Spanish-speaking and other underserved patients. An additional need determination for this purpose would duplicate existing services.

Please let me know if you have any questions. Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink that reads "Catharine W. Cummer". The signature is written in a cursive, flowing style.

Catharine W. Cummer