

Founded as Hospice of Wake County • 1979

Public Hearing Comments Wake County Hospice Inpatient Bed Adjusted Need Petition

Good afternoon. My name is Cooper Linton, and I am the Vice President of Marketing and Business Development at Transitions LifeCare, and I am here today to speak on behalf of our petition to eliminate the need determination for additional hospice inpatient beds in Wake County in the 2017 State Medical Facilities Plan.

Transitions LifeCare is the largest and most experienced, non-profit hospice provider in this region. Founded in 1979 as Hospice of Wake County, our mission is to care for individuals and families with compassion, support, and expertise as they navigate the end of life or life-changing illness. In Cary we currently operate a 20-bed hospice home, which includes 14 hospice inpatient beds.

The Proposed 2017 SMFP includes a need determination for seven additional hospice inpatient beds in Wake County. However, we believe that specific circumstances exist in Wake County which substantiate eliminating the need for any additional hospice inpatient beds within the service area at this time. This afternoon we will submit our petition to the SHCC, so I'd like to briefly highlight the rationale for our petition.

The 14 hospice inpatient beds in our facility have been well utilized since opening in 2010. We previously received CON approval to add 10 beds to the facility, and are currently in the process of gaining the local regulatory approvals necessary to begin construction of the facility addition. We anticipate construction will begin this fall and that the project will be complete in 2017. This expansion will increase our GIP capacity by 71%, and the resulting 24 inpatient beds will make our facility one of the largest in North Carolina.

Hospice inpatient facilities are expensive to construct and to operate. Therefore, it is essential to demonstrate that all hospice inpatient beds approved for development are fully utilized before additional beds are determined to be needed by the standard methodology. Additional time is needed to digest the soon-to-be-operational beds and to observe their utilization level. Therefore, the need determination for 7 additional hospice inpatient beds is premature, and it is most reasonable to remove the need determination, because it will have no negative impact on access to hospice inpatient services for Wake County residents, which are being expanded right now anyway.

Our petition will also describe the disparity between the statewide inpatient utilization rate and the Wake County inpatient utilization rate. Historically, the Wake County inpatient utilization rate has been lower compared to statewide utilization. We have observed this is largely due to local access to high acuity acute care hospitals. Many times, patients at Wake County hospitals are too fragile to be transferred from local hospitals to our inpatient facility. It is unlikely that hospice inpatient utilization patterns and levels will change substantially in the near term. Therefore, it is unrealistic to assume statewide hospice inpatient utilization rates in Wake County.

We believe that our petition is consistent with the three basic principles of quality, access, and value identified in the State Medical Facilities Plan. Elimination of the need determination will not reduce access to hospice inpatient services in Wake County, which as I've stated are actually in the process of being significantly expanded. Rather, addition of the seven beds, beyond the 14 existing and 10 previously approved and developing beds, would result in underutilization of all the beds, and thus health care value would not be maximized. Also, approval of our petition would promote safety and quality because it will enable Transitions LifeCare's existing and approved hospice inpatient resources to be fully developed and utilized before additional hospice inpatient beds are developed.

In closing, we support the SHCC and the State's health planning objectives, but we believe there is currently no need for any additional hospice inpatient beds in Wake County, beyond the 10 additional beds that we are currently developing. We hope you will support us in this effort by approving our petition for an adjusted need determination. Thank you for providing us with the opportunity to discuss this important community issue.