



March 21, 2018

North Carolina Division of Health Service Regulation
North Carolina State Health Coordinating Council
2704 Mail Service Center
Raleigh, NC 27699-2704

RE: Petition for Change in Policy to Exempt CCRCs from Need Determination to Establish a Medicare Certified Home Health Agency

Dear Members of the Health Coordinating Council:

I am writing in support of the petition filed by LeadingAge North Carolina to exempt CCRCs from the Need Determination in establishing a Medicare Certified Home Health Agency - as defined in Chapter 12 of the NC State Medical Facilities Plan.

As a licensed CCRC, Givens Estates is committed to providing a seamless continuum of care which includes a full range of health services to our residents. With the increased demand for home and community based care, Givens Estates (as well as the broader CCRC industry) continues to see the need for the provision of Medicare certified home health within the post-acute care environment. Under the current model, our residents are tasked with securing these services from third-party providers. This petition will provide a path for Givens Estates to establish a Medicare certified home health agency which will allow us to serve as another alternative provider for our residents with home health needs.

We understand that this exception will allow our community to service only those residents with a Givens Estates continuing care contract. We also understand that resident choice is always paramount for the provision of health services and this exception would allow Givens Estates to potentially be another home health provider option for the resident to choose from.

Our campus currently operates 70 licensed Medicare-certified skilled nursing facility beds, as well as 70 licensed adult care beds. Similar exemptions exist for these care-related services within the State Medical Facilities Plan, both of which we operate successfully and with high quality of care.

Additionally, as a current SNF Medicare provider, we are well-versed with the Medicare Requirements of Participation and the state and federal regulatory requirements mandated on Medicare service providers. And although our SNF patient volumes may be low, compared to a typical SNF, we operate with the advantage of our CCRC model

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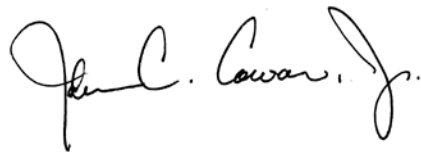
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givensestates.org

and under the financial requirements regulated by the NC Department of Insurance; all while delivering exceptional patient care.

We also believe that home health care can be a significant savings to Medicare, when compared to SNF care. The future of health care will depend on providing care to patients in the most appropriate setting of care, without sacrificing quality. As an industry, we must find the most cost-effective models to care for our aging population. This petition allows Givens Estates and other CCRCs to add an additional layer of care, which, at a minimum, will allow for an increased continuity of post-acute care for residents. It also adds an opportunity for Givens Estates to think more progressively with regards to the provision of health care, which will be essential in today's health care landscape. As such, we are fully supportive of this petition for a change in policy relative to home health agencies for CCRCs for the 2019 State Medical Facilities Plan.

Sincerely,

A handwritten signature in black ink that reads "John C. Cowan, Jr." The signature is written in a cursive style with a large initial "J" and a prominent "C".

John C. Cowan,
Executive Director