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IMPACT

March 22, 2018

Christopher G. Ullrich, M.D., Chairman, State Health Coordinating Council  
North Carolina Division of Health Service Regulation  
Healthcare Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, NC 27699-2704

Dear Dr. Ullrich and Members of the Council:

The Carolinas Center for Hospice & End of Life Care (TCC) appreciates the opportunity to provide comments related to the LeadingAge NC Petition for Change in the North Carolina State Medical Facilities Plan – Policies Applicable to Home Health Services (HH) dated March 2018. While we appreciate LeadingAge’s desire to provide additional services to the continuing care retirement communities (CCRC) residents, TCC is strongly **opposed** to its petition for a statewide adjusted needs determination for all continuing care retirement communities. **If this petition is granted, we feel it will undermine the CON process, limit patient choice, exclude non-residents, grant special benefits to all CCRCs, and create a dangerous precedent.**

We believe CON regulations provide an intentional and planned approach to ensure services are available where they are **needed** in all areas of the state. North Carolina’s regulations allow for new entrants to the market by allowing petitions for ‘**adjusted need determinations**’ to the State Health Coordinating Council. This petition seeks a complete exemption statewide and not for any particular geographic area. Unlike other geographic-based petitions for adjusted need determinations, this petition fails to show any justification for any adjusted needs determination. In addition, CCRCs have tried unsuccessfully in recent years to circumvent the CON process by seeking an exemption from CON review for CCRCs (see HB 900, 2013 Session). TCC also **opposed** those bills when they were introduced in the legislature. TCC requests that the SCHCC **deny** this petition.

We are available to answer any questions you might have about our comments.

Once again, I would like to thank you for the opportunity to share our concerns.

Sincerely,

*Marisette Hasan*

Marisette Hasan, BSN, RN  
President/CEO



**The Carolinas Center**  
Innovation and Excellence in Advanced Illness at End of Life