

From: [Hayes, Maria](#)
To: [DHSR.SMFP.Petitions-Comments](#)
Subject: [External] URGENT SHCC Home Health Update- LeadingAge Petition Exempting CCRCs from HH Need Determination for CON
Date: Thursday, March 22, 2018 4:49:51 PM

CAUTION: External email. Do not click links or open attachments unless verified. Send all suspicious email as an attachment to Report Spam.<<mailto:report.spam@nc.gov>>

Please oppose this petition as it creates a biased playing field and limits competition.

The Petition does not meet the basic requirements for a petition seeking a policy change, as set forth in the 2018 State Medical Facilities Plan ("SMFP"). Where is the data showing the need for this change?

The Petition raises a host of patient care and regulatory compliance problems and is inconsistent with the Basic Principles. The Petition states that it intends to limit competition. The Petition does not adequately address the serious concerns with providing home health services and meeting the Medicare Conditions of Participation with such a small census of potential patients. In fact, LeadingAge cannot even provide an estimate on how many patients that CCRCs would project to serve if they were granted this exemption.

LeadingAge makes several misleading statements that its Petition and therefore I highly recommend you oppose their petition.

Thank you,
Maria

Sent from my iPhone

The information contained in this E-mail transmission is intended only for the use of the individual or entity to whom it is addressed. It may contain privileged, confidential, and protected health information. If you received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then please delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. To do so could violate state and Federal privacy laws. Thank you for your cooperation. Please contact the sender if you need assistance. Dedicated to Hope, Healing and Recovery.