

From: [Hogan, Rich](#)
To: [DHSR.SMFP.Petitions-Comments](#)
Subject: [External] Leading Age Petition
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To whom it may concern:

Please accept for consideration my concerns in opposition to the Leading Age petition to change the current policy for Certificate of Need application and determination. The Leading Age petition ("The Petition") fails to demonstrate lack of access to care, quality care or provider choice. Evidence to support need is anecdotal and fails to demonstrate that the patients under review cannot access care from existing Medicare-certified home health agencies with current valid Certificates of Need.

The Petition fails to support evidence that Leading Age is somehow restricted in its ability to compete for new Certificates of Need in a manner consistent with current policy. Leading Age can compete or acquire Certificates of Needs as can any other provider.

The existing Certificate of Need methodology has provided for a sufficient number of providers to satisfy the needs of North Carolinians while avoiding the excesses witnessed in states like Florida and Texas where exemptions have been permitted.

Furthermore, The Petition raises a serious provider choice issue in that Leading Age admits its intention to limit competition and patient choice.

I respectfully urge the rejection of the Leading Age petition in the interests of home health patients and the State of North Carolina.

Sincerely,

Richard D. Hogan

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