

**From:** [Pat Sprigg](#)  
**To:** [DHSR.SMFP.Petitions-Comments](#)  
**Subject:** [External] Public Comment for Petition Health Service Regulation  
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To the State Health Coordinating Council:

I am writing on behalf of Carol Woods Retirement Community 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). Carol Woods is a continuing care retirement community (CCRC) committed to providing seamless continuity of care for the residents of our community in Chapel Hill, North Carolina. Since opening in 1979, we have a demonstrated track record of providing consistent, high quality health care to our residents. The hallmark of our community are the long-term relationships we've created with our residents, who count on us to provide personalized care and support during their times of need. We do this through our on-site health clinic, assisted living, Medicare-certified skilled nursing facility and licensed home care services.

We are increasingly experiencing the need and interest from residents for the provision of Medicare Certified Home Health care following a hospitalization or skilled nursing stay. We want to ensure our residents are able to remain in their own homes and receive quality care from the people they trust and know. Currently, our residents must bring in these services from external agencies. This petition will open up the option for Carol Woods to establish our own Medicare Certified Home Health Agency, to be offered only to our own residents – those older adults with contractual relationship – to give them the choice of providers for their home health needs. Choice is critical.

Carol Woods currently operates 30 Licensed Nursing home beds certified for Medicare and 89 Licensed Adult Care Home 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. As a current skilled nursing Medicare provider, we understand the Medicare Requirements of Participation, as well as the state and federal regulatory requirements mandated on Medicare service providers. We operate with the advantage of our CCRC model and under the financial requirements regulated by the NC Department of Insurance; all while delivering exceptional health care to our residents care. We also believe that home health care can be a significant savings to Medicare, when compared to skilled nursing care. As an industry, we must find the most cost-effective models to care for our aging population. This petition allows Carol Woods and other CCRCs the ability to increase the continuity of care for our residents. As a continuing care community, this is what we strive to achieve. We are fully supportive of this Petition.

I would welcome the opportunity to discuss this issue in further depth. Please feel free to call me: (919) 918-3284 or email: [psprigg@carolwoods.org](mailto:psprigg@carolwoods.org).

Sincerely,  
Patricia E. Sprigg

*Patricia E. Sprigg*

*President and CEO  
Carol Woods Retirement Community*

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