

July 27, 2018

North Carolina Division of Health Services Regulation  
Healthcare Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, NC 27699-2704

Dear Committee Members:

We are writing in opposition to the pending petition to the State Health Coordinating Council to adjust the need for determination for a home health agency of office in Randolph County. We believe this petition is unfounded and based on assumptions that have no merit.

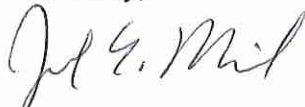
It is our firm belief that critical disabled and senior populations, regardless of literacy level or primary language, have sufficient access to an array of home health providers in this county. Multiple, existing home health agencies, such as Advanced Home Care, are working with an array of medical providers, hospitals, social service agencies, and other community organizations to provide quality, safe, and comprehensive services to the medically underserved in Randolph County. Advanced Home Care and other home health agencies are actively servicing Latino/Hispanic patients today and use translator services to deliver culturally competent and effective care. This petition asserts an assumption that patients are not being served yet provides no data or quantitative justification to support this claim.

As a large home health organization providing services from many branches and regions, we understand that a certain level of scale and size is needed given the complexity of home health operations. We also feel that the unnecessary proliferation of home health agencies results in increased health care costs and taxpayer bills without any improvement to quality, access or value. We recognize the importance of the Certificate of Need process for home health in ensuring that each county has a sufficient number of providers and does this in a methodical, fiscally sound manner.

We urge the committee to not approve this petition.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Joel C. Mills". The signature is written in a cursive style.

Joel C. Mills  
CEO