

August 9, 2019

North Carolina Division of Health Services Regulation  
Healthcare Planning and Certificate of Need Section  
2704 Mail Services 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 Rutherford County. We believe this petition is unfounded and based on assumptions that have no merit.

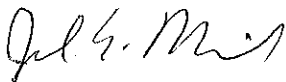
It is our firm belief that senior populations have sufficient access to an array of home health providers in this county. Multiple, existing home health agencies, such as Advanced Home Care, are working with an array of medical providers, hospitals, social service agencies, and other community organizations to provide quality, safe, and comprehensive services to the medically underserved in Rutherford County. Existing home health agencies in this county provide high quality care evidenced by superior star ratings, with readmission rates below the state and national average, invalidating the claim in this petition that quality care is not available. 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 and appreciate 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,



Joel C. Mills  
CEO