Petition to Adjust the Certificate of Need Determination Proposed Plan 2024

## Petitioner:

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## 2. A statement of the requested adjustment, citing the provision or need determination in the proposed state Medical Facilities Plan:

Coastal Billing and Home Care Services (CBHC) would like to petition for a redetermination for CON in Columbus County. CBHC has been operating as a Nonmedical Home Care Agencies since 2019 at which time was convenient as a new company. CBHC has since grown and wishes to become a medical operating agency. CBHC have found that the county of interest (Columbus) only has two Home Health Agencies that are actively seeing clients as a Medicare Certified Home Health Services and 9 other facilities serving clients outside of the county. We have many clients coming to us about medical services because the other agency seems to far for them to get acquainted with.

Since 2019 we have provided nonmedical care and went over and beyond to see that our clients were satisfied with the services and established a trusted name in Home Care Services in the community which includes: ADL care and IADL care giving us a five-star rating. Unfortunately, not being able to provide the medical aspect of our healthcare field has been disappointing to them, having to share their home with multiple providers learning each provider rules just to keep the Aide We provide has been a challenge for the families and clients.

We serve the population from ages 0-100+, and care is different for them all. The population at greatest risk are our disabled and extensive care clients that must resort to facility care or none, when we have qualified staff from RNs to CNA's that can take care of them at home which is most likely their preference. Out of the 11 Agencies that serve the said county none of which service the age group 0-17 which is a growing population of need in our area and surrounding area which the rural areas are tremendously affected. We get several referrals for this age group from payor sources like Medicaid and Manage Care Medicaid, but we must turn them down because we are not able to provide medical care to their young, loved ones. We are assured to provide Person Centered care for all our clients.

We have received many referrals that comes from various insurance agencies such as: Hospital Care Managers; VA, Medicaid CAP, Medicaid PCS, Manage Care, and even some Private Duty that request Nursing Care, but we had to turn them down, due to the fact we were not able to

provide the care they needed. Therefore, that made them unable to choose the facility of choice, so they MUST remain at current provider which is not their choice. We are already Medicaid approved to service these clients and the ones not able to get the resources to reach for help in the community or benefits through private insurance are the ones that are not being served.

Our census since 2021 has been over 100 clients and now, we are maintaining 40 all of which left for several reasons and some being services we could not provide. Our population of referrals has been declining because of the medical need we cannot supply to our clients; they are requiring more help in their homes then we can provide leaving families and facilities to make choices to discharge and resort back to providers they are not happy with.

In our effort to make this happen, CBHC plans to meet the need of these clients by reaching back out to all the vendors, Persons who has reached out to us with referrals and letting them know that we have received our CON and are now able to serve their clients and assure the quality of care and safety they deserve at their request and hire more suitable staffing to service all the areas of need.

## 3. Reason for the adjustments; statement of the adverse effects on the population of the affected area that are likely to ensue if the adjustment is not made:

If we are not able to get this request approved, it will be dissatisfied and a great disappointment to CBHC and to clients that are at risk of discharge because of their decline in health and we will no longer able to provide care for them at the capacity they need. This will also have an impact on the facilities' growth as an agency as the economy is desperately changing and there is a greater need to help clients at home at which time, since COVID everyone is choosing that option. County residents will continue to receive the current services in which they receive and those not being service will still be unserved. As stated earlier the age group not being served is 0-17 and those that are being served are limited to the providers they can choose from. It seems logical to seek local ownership and involvement of a company with close ties and relationship to the county. With the rise of the need for help many families reach for support and trust in local businesses, strangers coming into homes are not always a valued choice but with someone they heard about in the community from others may just ease the burden and fear of the unknown person. We offer the interest and commitment to provide the best care for the community and population.

## b. statement of alternative to the proposed adjustment that were considered and found not feasible.

CBHC have not found any other adjustments listed or stated for alternatives to be considered other than continuing care as ordered, which is not beneficial for those clients that are not being served.

4. Evidence that health service development permitted by the proposed adjustment would not result in unnecessary duplication of health resources in the area.

As mentioned previously, none of the counties that serve all age groups that are eligible for services, we will be opening our services to the others that are left behind with no service. All 11 counties services a majority group of 18-100+ leaving the growing population of ages 0-17 unattended. Therefore, no other agency is providing in the said County to its potential causing no duplication of services.

5. Evidence that the requested adjustment is consistent with the three Basic Principles governing the development of the North Carolina State Medical Facilities Plan: Safety and Quality, Access and Value.

**Safety and Quality**. CBHC has set standards in place to service our clients in the most respected and way. CBHC is locally owned and invested in the community, issues of safety and quality are quickly addressed, and staff are trained annually to ensure such things.

**Access.** Columbus county is a very rural area. CBHC clients have some kind of financial assistance. There is no discrimination against anyone due to race, finances, or disabilities for criteria for receiving services. The Home Health Care sector would be no different, as all clients will have access to CBHC services.

**Value.** By being located in the middle of several counties, CBHC is able to serve the county effectively and get staff that will not have to drive so far away to get to their jobs, which will help us ensure services are rendered and less call outs.

Thank you for your time and we hope that you will strongly consider giving Coastal Billing and Home Care Services the opportunity to bring quality care and efficient home health care to the citizens of Columbus County and surrounding areas as we have been doing as a nonmedical facility.