

**[SUBMITTED ELECTRONICALLY \(DHSR.SMFP.Petitions-Comments@dhhs.nc.gov\)](mailto:DHSR.SMFP.Petitions-Comments@dhhs.nc.gov)**



August 9, 2023

State Health Coordinating Council  
2704 Mail Service Center  
Raleigh, North Carolina. 27699-2704

**Re: Petition to Adjust the Certificate of Need Determination Proposed Plan 2024  
by Coastal Billing and Home Care Services, LLC**

Dear State Health Coordinating Council Members and State Health Planning Staff:

Thank you for the opportunity to comment in response to the petition to adjust the certificate of need determination in the 2024 proposed plan, submitted by Coastal Billing and Home Care Services, LLC (“CBHC”). The Association for Home & Hospice Care of North Carolina (“AHHC”) opposes this petition and has concluded that the existing methodology and the several existing home health agencies in Columbus County are adequately serving the entire community.

As an initial matter, the petition does not meet the requirements of the 2023 State Medical Facilities Plan (“SMFP”), which permit petitioners to “submit a written petition requesting an adjustment to the need determination in the Proposed SMFP if they believe that special attributes of a service area or institution give rise to resource requirements that differ from those provided by the standard methodologies and policies.” 2023 SMFP, at 8. The CBHC Petition acknowledges that Columbus County (the service area that it is seeking to use to deviate from the standard methodologies) currently has two home health agencies located within the county and nine other facilities serving clients from outside of the county.

Further, the CBHC Petition alleges they have been told “the other agency seems too[sic] far for them to get acquainted” and “out of the eleven agencies that serve [Columbus County] none of which service the age group 0-17” as reasons for the adjustment but does not provide any data to demonstrate actual barriers to residents receiving home health services within Columbus County.

The standard need methodology ensures a sufficient number of home health agencies in Columbus County and all 100 North Carolina counties and supports home health agencies providing quality, cost-effective care. Columbus County is currently serviced by at least 11 licensed home health agencies. The CBHC Petition requests an additional need determination in Columbus County without demonstrating that the methodology is flawed or that the existing methodology fails to provide sufficient access to home health. Therefore, AHHC respectfully requests that CBHC’s Petition be denied.

\* \* \*

On behalf of its members and the patients and communities they serve, AHHC respectfully requests that this petition be denied. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Jillian Totman". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Jillian Totman  
Vice President of Government Relations & Public Policy  
The Association for Home & Hospice Care of North Carolina