

COMMENT ON PROPOSED CHANGES TO METHODOLOGY

Comment on Proposed Changes to Methodology for Adult Care Home Beds for the *2019 State Medical Facilities Plan*

COMMENTERS

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COMMENT

As recent petitioners on the adult care home methodology¹, we would like to take this opportunity to thank the members of the SHCC, particularly the Long Term and Behavioral Health Committee and the Healthcare Planning and Certificate of Need Section staff, who recognized the need for changes to the methodology and did much work to develop recommendations for change. As you may note from our petition in 2017, several of the issues we identified have been addressed by the proposed changes. As such, we strongly support the proposed revisions.

In particular, we believe the proposed changes to the methodology will more accurately reflect conditions in each county, thereby being more responsive to the need in each county. The proposed revisions to the SMFP policies are needed to address the reality of how CCRC's function and to enable the relocation of existing beds to respond to changes in population and need over time. We also appreciate the desire to increase access to ACH beds by special assistance populations. Finally, we believe the additional data captured by the revisions to the license renewal applications will allow for more robust planning in the future.

While we support the proposed changes, we also urge the SHCC to recognize that not all issues that exist around the state can be resolved by these changes. In particular, as noted in our petition last year, though the special assistance population may be an underserved group, we believe that those in the middle-income levels, who may not qualify for special assistance but cannot afford the higher-end facilities, often lack access even when beds are available in more exclusive facilities.

In addition, since we have not yet seen the projected need resulting from these methodology changes, there may continue to be unmet needs that are not addressed by the changes. As such, we urge the SHCC to recognize that some county-specific issues may still need to be addressed through special need petitions, even with the positive changes reflected in the proposed revisions.

Thank you for the opportunity to comment on these important changes. If we can provide any additional information, please feel free to reach out to us.

¹ https://www2.ncdhhs.gov/dhsr/mfp/pets/2017/lrbh/0728_ach_orange_petition.pdf