

**Long-Term and Behavioral Health Committee
Agency Report
Adjusted Need Petition for
Hospice Home Care Office in Mecklenburg County
2024 State Medical Facilities Plan**

Petitioner:

Heart and Soul Hospice of the Carolinas, LLC
10106 Saffir Court
Mint Hill, North Carolina 28227

Contact:

Kevin Allison,
Chief Operating Officer
704-777-1407
kallison@heartnsoulhospice.com

Request:

Heart and Soul Hospice of the Carolinas (“Heart and Soul”) requests an adjusted need determination in the *North Carolina 2024 State Medical Facilities Plan (SMFP or “Plan”)* for one hospice home care office in Mecklenburg County, “focused on serving historically underserved racial and ethnic minority populations.”

Background Information:

Chapter Two of the *SMFP* notes that during the summer, the Agency accepts petitions that “involve requests for adjustments to need determinations in the *Proposed SMFP*. Petitioners may 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.” It should be noted that any person may submit a certificate of need (CON) application for a need determination in the *Plan*. The CON review could be competitive and there is no guarantee that the Petitioner would be the approved applicant.

As stated in Chapter 12 of the *SMFP*, “the hospice home care office methodology projects need three years beyond the current reporting year.” The projection year is 2025 for population and deaths and deaths served in the *Proposed 2024 SMFP*. No need determinations are considered for counties with three or more hospice home care offices per 100,000 population. The threshold for a need determination is a deficit of 90 or greater deaths. The placeholder for new hospice offices is the same as the current threshold of 90 deaths.

Heart and Soul operates two hospice home care agencies – one in Tennessee and one in Washington – to provide culturally appropriate hospice care for the historically underserved racial and ethnic minority populations. The Petitioner “believes that the county [Mecklenburg] is in need

of, and would benefit from, the same culturally competent type of care they are delivering elsewhere.”

In the *Proposed 2024 SMFP*, “Table 13A, Inventory of Licensed Hospice Agencies” shows there are nine licensed hospice agencies in Mecklenburg County. The “Chapter 13: Hospice Data by County of Patient Origin – 2022 Data” report indicates a total of 28 facilities consisting of 26 licensed hospice agencies and 2 hospitals provided hospice services to the residents of the county. Six of the facilities are in the county. All facilities (i.e., hospice home care offices, inpatient facilities, and hospitals) that are licensed to provide hospice services are eligible to provide hospice home care services.

Analysis/Implications:

The Petitioner believes the *SMFP*’s hospice home care methodology does not account for the unique circumstances in the service area, particularly population growth and aging in Mecklenburg County’s racially and ethnically diverse population.

The Agency thoroughly reviewed both the county and State population demographics. Table 1 shows demographics by racial group using 2025 population estimates as outlined in Step 2 of the hospice home care methodology (*Proposed 2024 SMFP*, p. 261). The proportion of Mecklenburg’s population that identifies as Black is 9% greater than the proportion of North Carolina’s population that identifies as Black. Also, together, other minority populations represent a greater share of the total population in Mecklenburg as compared to the analogous groups for the State overall.

Table 1: NC and Mecklenburg County, Population and Percentages by Race, 2025 Estimates

	American Indian / Alaska Native	Asian & Pacific Islander	Other	Black	White	Total All Races	American Indian / Alaska Native	Asian & Pacific Islander	Other	Black	White
Mecklenburg	14,834	94,180	48,173	362,831	686,740	1,206,758	1%	8%	4%	30%	57%
North Carolina	187,639	446,242	491,036	2,283,821	7,624,235	11,032,973	2%	4%	4%	21%	69%

Source: NC Office of State Budget and Management

Agency staff also reviewed the age breakdowns by race for Mecklenburg County and the State. Data reported on the License Renewal Applications (LRAs) indicate hospice services are accessed more frequently by the 65 and older population than any other age group. Table 2 provides a review of the population and percentages of each age group by race over the age 65. Unlike the general population, this age group has a representation of minority populations in Mecklenburg that is more than four percentage points lower than what occurs in the State overall. Additionally, Mecklenburg County’s population is younger than the State’s overall, with a median age of 38.1 years and 42.6 years, respectively.

Table 2: NC and Mecklenburg County, Population Over 65 Years of Age and Percentages by Race, 2025 Estimates

	American Indian / Alaska Native	Asian & Pacific Islander	Other	Black	White	Total All Races	American Indian / Alaska Native	Asian & Pacific Islander	Other	Black	White
Mecklenburg	1,118	8,249	1,184	43,165	122,246	175,962	0.6%	4.7%	0.7%	24.5%	69.5%
North Carolina	25,475	446,424	39,486	341,066	1,590,593	2,443,044	1.0%	18.3%	1.6%	14.0%	65.1%

Source: NC Office of State Budget and Management

Agency staff also examined hospice admissions during the 2022 data reporting year as submitted on the 2023 Hospice LRAs. Table 3 details admissions delineated by racial groups as reported by hospice providers. The percentage of all minorities admitted to hospice care in Mecklenburg County was slightly higher than admissions of minorities in the State overall (63.93% vs. 62.6%, respectively).

Table 3: NC and Mecklenburg Hospice Admissions and Percentages by Race, Data Year 2022

	Hispanic	Non-Hispanic	American Indian or Alaskan Native	Asian	Hawaian or Other Pacific Islander	Other	Black or African American	White	Total All Races	All Minorities	White
Mecklenburg	142	4,419	17	69	2	155	1,028	3,290	9,122	63.9%	36.1%
North Carolina	932	54,032	520	409	730	3,700	8,490	41,115	109,928	62.6%	37.4%

Source: 2023 License Renewal Applications (LRA)

The Petitioner requests an additional hospice home care office in Mecklenburg County that will provide culturally competent services to minority populations. The Agency’s analysis demonstrates that the age group that most frequently accesses hospice services is projected to be less dominant in the Mecklenburg service area at the time point that need for additional services is being projected by the need determination methodology. Further, hospice facility data show that existing hospice facilities in Mecklenburg County serve a greater percentage of minority individuals than the percentage served statewide. Additionally, a hospice provider’s license does not specify or limit the demographics served.

Agency Recommendation:

The Agency supports the standard methodology for hospice home care as presented in the *North Carolina Proposed 2024 SMFP*. Given available information and comments submitted by the August 9, 2023 deadline, and in consideration of factors discussed above, the Agency recommends denial of this Petition.