From:	Bryan, Angela
To:	DHSR.SMFP.Petitions-Comments
Subject:	[External] OPPOSITION TO PETITION
Date:	Thursday, March 22, 2018 4:04:41 PM
Attachments:	DRAFT AHHC Comments in Opposition to CCRC Petition.pdf

I oppose this petition. The Petition does not meet the basic requirements for a petition seeking a policy change, as set forth in the 2018 State Medical Facilities Plan ("SMFP"). LeadingAge has provided no data showing the need for this policy change. Simply put, the proposed policy is a solution in search of a problem.

The Petition raises a host of patient care and regulatory compliance problems and is inconsistent with the Basic Principles. The Petition states that it intends to limit competition. The Petition does not adequately address the serious concerns with providing home health services and meeting the Medicare Conditions of Participation with such a small census of potential patients. In fact, LeadingAge cannot even provide an estimate on how many patients that CCRCs would project to serve if they were granted this exemption.

Sincerely,

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