

## Blue Ridge

August 9, 2018

delivered via email

Valarie Jarvis  
Chair, Long Term Care and Behavioral Health Committee  
State Health Coordinating Council

Amy Craddock, PhD  
Assistant Chief, Healthcare Planning  
Healthcare Planning and Certificate of Need Section  
NC Division of Health Service Regulation  
2704 Mail Service Center  
Raleigh, NC 27699

**RE: Comments on Petition filed by Liberty Commons Nursing and Rehab Center of Hyde County, LLC for Adjusted Need Determination of 23 Adult Care Home Beds in Hyde County**

Dear Ms. Jarvis and Dr. Craddock,

Thank you for the opportunity to submit comments in response to the petition from by Liberty Commons Nursing and Rehab Center of Hyde County, LLC for and Adjusted Need Determination of 23 Adult Care Home Beds in Hyde County in the *2019 State Medical Facilities Plan* ("SMFP"). We appreciate the time and effort invested by members of staff, the State Health Coordinating Council, and volunteers.

### Overview

Liberty Commons makes an important point. The standard adult care home methodology uses occupancy of existing facilities to determine need for beds. A county with no facilities will never show a need. This is clearly unfair to residents of Hyde County.

The comment illustrates another shortcoming in the methodology. Counties with growing populations in which the adult care beds are at actual or virtual capacity will show declining use rates and generate declining need calculations. The numerator will stay fixed and the denominator (population) will go up every year.

### Response

Liberty's petition is reasonable and we encourage the Agency to approve it. We also believe that the Agency should investigate the impact of the methodology on places where population is growing and use rate is static.

Thank you for taking time to consider this important issue.

Regards,



D. Gray Angell  
Member / Manager  
Batangas Consulting, LLC