

August 9, 2018

North Carolina Division of Health Services Regulation
Healthcare Planning and Certificate of Need Section
2704 Mail Service Center
Raleigh, NC 27699-2704



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

Thank you for the opportunity to comment to the State Health Coordinating Council in reference to the petition for one Medicare Certified Home Health Agency in Randolph County submitted by Touched by Caring Hands of North Carolina, LLC. The Association for Home & Hospice Care of NC (AHHC) **opposes** this petition for the reasons below:

- 1) There are already multiple home health agencies servicing this county. Randolph County is served by Home Health Services of Randolph Hospital, Advanced Home Care, WellCare Home Health and Kindred in addition to other agencies that are in the service area. The first agency mentioned is the hospital's home health agency that has the highest market share. The medical facilities state plan reflects this.
- 2) Language barriers in regards to the Hispanic/Latino population specifically have no access issues to home health services in Randolph County. The medical community, long term care facilities, assisted living centers and patients in Randolph County would validate this. Diversity of age groups being serviced by home health providers in this county also supports this statement. All Home Health agencies use translator services when deemed necessary.
- 3) Discharge planners at Randolph Hospital are able to transition patients effectively to home health care in the region as well as discharge planners from Cone Health and other tertiary care centers for patients who live in Randolph County regardless of any language barriers that might be present.
- 4) Current quality of care is strong as reflected by the star ratings of Home Health of Randolph Hospital, Advanced Home Care and other agencies servicing the zip codes in Randolph County.

In summary, AHHC believes this petition is unnecessary. We do hope to meet the petitioners in the near future to talk about their petition and what we can do to understand their position going forward. We encourage Touched by Caring Hands of North Carolina to apply for a Home Health agency whenever the methodology shows a need in their area/NC.

Thank you for your consideration.

Cordially,

A handwritten signature in black ink that reads "Tracy Colvard".

Tracy Colvard, VP of Government Relations and Public Policy
Association for Home & Hospice Care of North Carolina

Association for Home & Hospice Care of North Carolina

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