



August 6, 2024

Delivered Via Email

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State Health Coordinating Council
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RE: Comment on Petition for Adjusted Need Determination to create an adjusted need determination for licensed home health agency in Iredell and/or Alexander County in Proposed 2025 State Medical Facilities Plan

Dear Council Members and Staff,

Iredell Health respectfully requests that you Deny the above referenced petition from Gibson Care Corporation. We understand that they would like to expand the scope of their services to include Medicare payment. However, a need for additional home health agencies for Iredell and / or Alexander Counties in the 2025 State Medical Facilities Plan will not assure this petitioner of Medicare Certification. As you know, need for additional home health agencies in the SMFP welcomes any party to apply and compete for Certificate of Need Applications. Any party could apply for the need; and history suggests that many would.

The standard Home Health Agency Need methodology looks at historical use and growth patterns of agencies that currently serve the two counties. Table 12D shows that existing agencies will serve more patients from these two counties than the methodology forecasts residents will need. Use rates in the two counties are at or higher than the state average in all age groups. Data reflects our experience, as well. The petition mentions only Medicare and elderly patients. The methodology is based on service to all age groups.

Iredell Home Health is a non-profit that serves at the pleasure of Iredell County residents. Iredell Health absorbed the former county home health agency about 30 years ago. Our home health agency cares for about 1500+ patients a year; it is Medicare and Medicaid Certified and has CMS Deemed Status with ACHC. Most of our patients live in Iredell and Alexander counties. Iredell Health has no waiting lists; we take any patients of any age, including medically complex and charity patients. A nurse and an administrator are on call 24/7 every day. We accept all payor sources. Our home health agency partners with and shares documentation with the Iredell Health Wound Center; when patients have complex wounds or fragile tissues, we connect them with physicians in the Wound Center who, in turn, help guide these patients during the home health agency care episode and afterwards. Medication management is a routine element of Iredell Home Health care protocols. We offer CMS certified home health agency services, skilled nursing, physical, speech and occupational therapy and social work. Our home health agency's outcomes tell the story; patients meet their rehabilitation goals, and our readmission rates are below state and national averages.

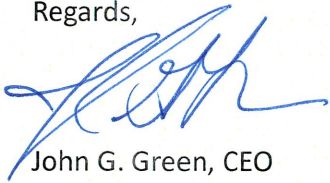
Iredell Home Health is also a leader in community admissions; 28 percent of our patients are referred direct from physician offices, skilled nursing, and assisted living facilities.

We are always willing to expand our horizons and our vision. To that end, we reached out to Gibson Care Corporation/ Home Instead and have agreed to look for ways that Iredell Home Health can partner with them, share services, and better serve residents of Iredell and Alexander Counties. Home Instead is a good company that provides important home care services. We are committed to using our mutual resources to make home care services in the two counties even better.

However, we do ask that you deny the petition because there is no need. Another home health agency need in Alexander or Iredell County in the 2025 SMFP would invite companies other than Home Instead to compete for limited staff resources and make it difficult for both of us to sustain the high-quality services that our communities depend on.

Thank you for your kind consideration. I am happy to answer any questions that you or other SHCC members may have.

Regards,



John G. Green, CEO
Iredell Health System