



August 6, 2025

State Health Coordinating Council  
2704 Mail Service Center  
Raleigh, North Carolina 27699-2704  
**DHSR.SMFP.Petitions-Comments@dhhs.nc.gov**

**RE: Public Comment Opposing Petition to Remove Hospice Home Care Office Need Determination  
Rockingham County (Proposed 2026 SMFP)**

PruittHealth respectfully urges the SHCC to reject the petition submitted by ANCORA Compassionate Care requesting removal of the hospice home care office need determination for Rockingham County in the Proposed 2026 SMFP. The foundation of North Carolina's healthcare planning process is the consistent application of its data-driven methodology, and the standard hospice methodology, refined through public and stakeholder engagement, offers a fair, predictable, and equitable way to allocate resources. Selectively adjusting the results of the standard methodology in response to short-term or localized interpretations of utilization trends introduces subjectivity into what is designed to be a neutral, policy-based framework for long-range healthcare planning.

ANCORA's petition argues that the two-year trailing growth rate used to calculate the projected median percent of deaths served by hospice is anomalously high due to the COVID-19 pandemic's mortality displacement effect. While the pandemic did temporarily alter mortality trends, these impacts were not unique to Rockingham County and were felt throughout the state. Importantly, the SMFP methodology is designed to account for such fluctuations by relying on multi-year data, consistent assumptions, and standardized calculations. The current methodology ensures uniform treatment across counties and avoids the risks of individualized exceptions based on post hoc analyses of specific data periods.

Moreover, the SMFP is a forward-looking planning document that projects need based not only on current utilization but also on expected population growth, aging demographics, and access challenges. Rockingham County's recent hospice penetration increase, rising to 44.2% in 2024, is a sign of ongoing demand, not saturation. The identification of need for an additional hospice home care office supports the core goals of access and value, by fostering patient choice, reducing travel burdens in rural areas, and enabling new providers to offer innovative care models. The SMFP methodology appropriately identifies where additional capacity may promote service delivery enhancements and system resiliency.

Finally, while ANCORA is undoubtedly a reputable and compassionate provider, preserving the SMFP's integrity must take precedence over protecting incumbent market share. The role of the SHCC is to uphold a planning process that benefits patients first. Upholding Rockingham County's need determination affirms the principle that objective, data-based policy, not local petitioning, should guide healthcare resource allocation. For these reasons, we respectfully request that the Council deny the petition and allow the 2026 SMFP to proceed as proposed.

Sincerely,

Connor Seim  
Director of Planning and Development  
PruittHealth