



August 6, 2025

State Health Coordinating Council
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RE: Public Comment Opposing Petition to Remove Hospice Home Care Office Need Determination Haywood County (Proposed 2026 SMFP)

PruittHealth respectfully urges the SHCC to deny the petition submitted by Four Seasons requesting the removal of the need determination for a hospice home care office in Haywood County from the Proposed 2026 SMFP. The petition's central premise, that the current methodology overstates need due to short-term statistical distortions from the COVID-19 pandemic, undermines the intent and function of the standardized methodology, which was designed precisely to accommodate fluctuations while ensuring fairness, transparency, and long-range planning. Selectively modifying the outcome of an objective formula based on retrospective interpretation would erode public confidence in the SMFP and set a precedent for bypassing data-driven projections whenever existing providers are uncomfortable with competitive expansion.

The SMFP's hospice methodology was collaboratively developed, consistently applied, and proven resilient across shifting demographic, epidemiologic, and utilization patterns, including the pandemic. Four Seasons' argument that "pull-forward" mortality has inflated the statewide median percent of deaths served by hospice ignores that the pandemic's impact was universal, not isolated to Haywood County. The 6.7% growth rate in the Proposed 2026 SMFP reflects a return toward pre-pandemic hospice penetration, not a statistical anomaly. Moreover, even if that rate is higher than the long-term median, the methodology's role is not to retroactively smooth every outlier, it is to provide a standardized, statewide framework that balances multi-year trends and identifies where projected service needs may arise.

Four Seasons' additional argument, that local utilization has "recovered" and therefore no unmet need exists, mischaracterizes the SMFP's intent. The plan does not solely measure present-day saturation but anticipates future demand based on objective indicators, including projected population, mortality trends, and hospice service utilization. The methodology identifies counties like Haywood, where current performance may mask latent access barriers, competitive constraints, or demographic shifts. Maintaining the need determination encourages responsiveness to evolving needs and promotes patient choice, particularly in rural regions where options may remain limited and market dominance can impede innovation or access.

Finally, while Four Seasons is clearly a high-quality provider with commendable performance metrics, regulatory policy must not be shaped to protect incumbents. Preserving the need determination supports the SMFP's fundamental goals: ensuring access, promoting quality through responsible competition, and using data, not narrative, to drive planning. We respectfully recommend the Council reject this petition and allow the 2026 SMFP methodology to function as intended for Haywood County and across North Carolina.

Sincerely,

Connor Seim
Director of Planning and Development
PruittHealth