

Certificate of Need Ad Hoc Committee
October 21, 2014
SC Home Care & Hospice Association Comments

Johnny Belissary, Board of Directors' Member will be speaking on behalf of Ellen Bolch, Board Chair

The South Carolina Home Care & Hospice Association supports the continuation of a CON requirement for Home Health Services and commits to working with this committee to make the requirement less burdensome.

A CON for Home Health is a good thing:

- Helps assure high clinical standards and operational integrity;
- Reduces overgrowth of agencies; and
- Reduces fraud and abuse

Our current overly restrictive regulation is a bad thing:

- Limits the approval of new agencies to no more than a few every two years;
- The current State Health Plan shows a need for only one agency in one county;
- Pent-up demand produces a stampede of providers competing for single CONs;
- Process does not effectively distinguish between competing applications;
- Agencies are not allowed to follow patients in neighboring county unless they hold a CON;
- Process allows same agency to hold more than one CON in a county;
- Appeals process results in years of delay and hundreds of thousands of dollars in fees before services can be delivered.

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SC Home Care & Hospice Association Comments, Continued

We recommend:

- Expediting the CON process through DHEC's review, the appeal and litigation process and the court's decision making;
- Removing the arbitrary limits on the number of agencies that can be approved by limiting the restrictions on the number of home health providers created through the need methodology in the State Health Plan;
- Evaluating the need for additional home health services on a case-by-case basis applying the project review criteria: Acceptability, Distribution (Accessibility), Medically Underserved Groups, Records of the Applicant, and Financial Feasibility;
- Adapting the process for technological advances that allow agencies to remotely monitor patients through use of hospital-grade telemonitors and videomonitors;
- That Home Health be included in the CON Reform Legislation and that the legislation state that the State Health Planning Committee must have standards for each section that CON currently applies to.

Thank you for the opportunity to submit comments and we look forward to working with you to make the CON process better.

SC Home Care & Hospice Association Board Chair
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