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Received by the CON Section Aug 30 2012

Via FedEx

August 30, 2012

Mr. Mike McKillip, Review Analyst
North Carolina Certificate of Need Section
809 Ruggles Drive
Raleigh, North Carolina 27603

RE: Vizion One, Inc.,, Comments on Competing Home Health CON applications, Mecklenburg County

Dear Mr.. Smith:

Enclosed please find an original and one copy of Vizion One's comments on the competing CON applications for Mecklenburg County.

Thank you for you or your attention to this matter.

Sincerely,

Newell D. Yarborough Jr.

Newell D. Yarborough, Jr.
President

c: Client

Received by the CON Section AUG 30 2012

MAXIM HEALTHCARE SERVICES*
F-10003-12

- No specific mention of experience in Medicare certified home health.
- Did not adequately address the need for each specific service described in Section II in Section III (Need/Demand).
- Year 1 patients of 426 not quantified.
- Mecklenburg County Needs Assessment not addressed.

CAROLINAS HEALTHCARE
F-10004-12

- The applicant is an existing Medicare certified home health agency serving Mecklenburg County which proposes a second office (branch) in the northern portion of the county. A new CON is not required to establish a second office within a CON approved county. Consequently, the application is not a requirement.
- The Charlotte Mecklenburg Hospital Authority is a co-applicant. It would seem that a joint venture between Carolinas Medical Center and the hospital authority might be a better alternative than filing a CON application.
- Mecklenburg County Health Needs Assessment not addressed.
- Basic principles not addressed (quality, access, value).

HEALTHKEEPERZ
F-10005-12

- The applicant is HKZ Group not Healthkeeperz (a management company). The application states that the proposed agency will be Native American-owned; however. HKZ Group is not Native American-owned, only the management company is.
- Very little information was provided on the applicant; rather, the emphasis was on the management company.
- Only basic services were proposed (no specialty programs such as Cardiac and Disease Management). While Respiratory (RT) Services was proposed, RT is not a Medicare home health reimbursable service.
- The services proposed in Section II were not justified (documented) in Section III (Need/Demand).

ASSISTED CARE
F-10006-12

- Did not justify the services proposed in Section II in Section III.

WELLCARE
F-10007-12

- No Medicare certified home health experience.
- Basis for patient projections in Year 2 (510 patients) not explained or justified.

*NOTE: Detailed comments on each application follows.

AMEDISYS
F-10008-12

- Amedisys already serves Meklenburg County through their Gaston County office (contiguous to Mecklenburg. Home health visiting staff typically serve patients from their homes. The office location is not a factor in delivering patient care. Consequently, approval of a Mecklenburg-based branch office would not seem to be the best use of resources.

- The need for each service proposed in Section II was not addressed in Section III.

- Amedisys failed to provide their historical Indigent/Charity care or amount of bad debt for their existing Gaston County office. In response to Question 11 in the Accessibility portion of the application, the table shows zero Indigent/Charity patients served.

- Amedisys did not propose serving patients within a 60 mile radius of Mecklenburg County.

CONTIUUM II
F-10010-12

- Only basic services proposed, no specialty clinical programs.

- Did not propose serving patients within a 60 mile radius of Mecklenburg County.

- Did not address the need for the services proposed in Section II in Section III.

- No Indigent/Charity patients served historically (Access, page 00062).

- Mecklenburg County Needs Assessment not addressed.

- The need assessment provided on page 00071 represents a statistically insignificant sample (only seven respondents out of hundreds of potential referral sources in Mecklenburg County.

- No indication of seeking accreditation (Section VI. Accessibility, Question 2) and documented (response to Question 1, same section) that the existing Medicare Certified home health agency owned by the applicant is not accredited (lack of quality of care).

- No response to Questions 7(a) and 7 (b) in the Accessibility section.

UNITED
F-10011-12

- United owns and operates an existing Medicare Certified home health agency in Wake County (UniHealth). This agency is not listed in the Medicare Home Health Compare database.

- The need for each service proposed in Section II not addressed in Section III.

- The Mecklenburg County Needs Assessment was not addressed.

- Failed to provide any historical Indigent/Charity care data on their existing agencies.

J&D HOME HEALTH SERVICES
F-10012-12

- Only basic clinical services proposed (no specialty programs).

- Need for each service proposed in Section II not addressed in Section III.
- Mecklenburg County Needs Assessment not addressed.
- GEN 1-3 policies not addressed.

VIZION ONE HOME HEALTH
COMPETING APPLICATION COMMENTS
MECKLENBURG COUNTY, NC CON APPLICATIONS
MAXIM HEALTHCARE SERVICES
F-10003-12

10A NCAC 14C .2003 PERFORMANCE STANDARDS

An applicant shall project, in the third year of operation, an annual unduplicated patient caseload for the county in which the facility will be located that meets or exceeds the minimum need used in the applicable State Medical Facilities Plan to justify the establishment of a new home health agency office in that county. An applicant shall not be required to meet this performance standard if the home health agency office need determination in the applicable State Medical Facilities Plan was not based on application of the standard methodology for a Medicare-certified home health agency office.

Unduplicated Patients and Growth:

Patients	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Year 1	426	2,870	282	326	378	330	74	204	50	211
Year 2	503	2,993	395	351	591	476	492	548	92	325
Year 3	516	0	416	0	821	0	0	548	0	348
Growth										
Year 2 to 2	118%	104%	140%	108%	156%	144%	665%	269%	184%	154%
Year 2 to 3	103%	Not Proj.	105%	Not Proj.	139%	Not Proj.	Not Proj.	0%	Not Proj.	107%

Source: CON Applications

Unduplicated Census found on Page 50of the Maxim Application. Unduplicated Census Appears to be reasonable and projects 3 Years.

IV. *UTILIZATION*

1. *Provide the projected number of unduplicated patients for the initial two years after completion of the proposed project. Patients should be counted only under the admitting service discipline. In Table IV.1, include only the unduplicated patients projected to be served by the proposed new home health agency office. If the applicant is proposing to develop a branch office or a subunit of an existing home health agency (i.e., the proposed office will use an existing provider number) and the applicant wishes to provide utilization data for the entire home health agency, please provide it in an appendix. The utilization data in Table IV.1 should include only the patients projected to be served by the new office*

Unduplicated Patient Distribution Projections:

Patients	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	66.67%	70.98%	65.00%	(A)	65.00%	71.21%	67.00%	89.00%	4.00%	54.14%
PT	33.33%	28.75%	35.00%	(A)	35.00%	28.24%	33.00%	11.00%	52.00%	43.34%
ST	0.00%	0.28%	0.00%	(A)	0.00%	0.31%	0.00%	0.00%	12.00%	2.52%
Total	**100.00%**	**100.01%**	**100.00%**	**(A)**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**68.00%**	**100.00%**
									(B)	
OT									32.00%	
Total	**100.00%**	**100.01%**	**100.00%**	**(A)**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**

Source Page 53, Maxim Application

(A) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix.
(B) Applicant allocated Unduplicated Patients to OT which is not an admitting discipline.

Unduplicated Census Distribution is found on Page 50 of the Maxim Application. Maxim states on Page 52 of the application that the Unduplicated Patients Projections are "based upon its corporate experience providing home health services via Medicare-certified agencies. The Distribution to admitting disciplines appears to be reasonable.

2. *Provide projected monthly utilization data, including the projected number of duplicated home health patients and visits for the initial two years after completion of the proposed project. In Table IV.2, include only the duplicated patients projected to be served by the proposed home health agency office. In Table IV.2, include only the duplicated patients projected to be served by the proposed home health agency office. If the applicant is proposing to develop a branch office or a subunit of an existing home health agency (i.e., the proposed office will use an existing provider number) and the applicant wishes to provide utilization data for the entire home health agency, please provide it in an appendix. The utilization data in Table IV.2 should include only the patients projected to be served by the proposed new office.*

VizionOne obtained the Duplicated Patients submitted by the applicants and calculated the Average visit per Discipline for each applicant. The Average Visits per Discipline were then compared to the Mecklenburg County statistics for existing agencies located in the county, agencies located outside the county and serving Mecklenburg County and then combined. The results for each year are as follows:

Duplicated Patients:

Year 1	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	522	5,660	297	(A)	287	275	79	253	2	361
PT	522	4,827	211	(A)	257	198	66	253	26	306
ST	33	282	15	(A)	23	21	3	12	6	19

OT	522	1,164	65	**(A)**	79	54	37	253	16	110
MSW	12	98	21	**(A)**	45	95	10	12	1	23
HHA	522	221	33	**(A)**	102	38	13	253	22	34
Total	**2,133**	**12,252**	**642**	**(A)**	**793**	**681**	**208**	**1,036**	**73**	**853**

Source: CON Applications

(A) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Year 1 Average Visit per Discipline:

Year 1	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	6.50	4.09	10.70	(A)	14.81	11.29	7.53	7.00	13.00	6.68
PT	5.13	3.18	9.35	(A)	7.01	15.82	7.02	4.88	13.00	6.28
ST	5.52	2.24	7.20	(A)	6.26	20.57	10.33	2.92	13.00	5.87
OT	1.19	2.63	5.98	**(A)**	5.47	3.15	2.78	1.47	13.00	4.01
MSW	3.25	7.86	1.14	**(A)**	1.60	3.49	0.70	1.25	13.00	1.48
HHA	0.86	12.87	13.45	**(A)**	4.94	10.47	5.92	1.19	13.00	10.58
Total	**22.45**	**32.87**	**47.83**	**0.00**	**40.09**	**64.80**	**34.29**	**18.71**	**78.00**	**34.90**

Source: Calculated Discipline Visits / Duplicated Patients

(A) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

NC Statistics:

	In County	Outside County	Combined In County & Outside County
SN	6.68	10.56	9.53
PT	6.28	8.31	7.56
ST	5.87	8.05	4.88
OT	4.01	5.32	7.85
MSW	1.48	2.02	1.90
HHA	10.58	12.71	12.40

Source:: NC Division of Health Services, Medical Facilities Planning Section, Home Health Database, Updated 7/26/2011, tblStaff.

Variances:

Year 1 In County	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	-0.18	-2.58	4.02	(A)	8.13	4.62	0.85	0.33	6.32	0.00
PT	-1.15	-3.11	3.07	(A)	0.72	9.53	0.73	-1.40	6.72	0.00
ST	-0.35	-3.63	1.33	(A)	0.39	14.70	4.46	-2.95	7.13	0.00
OT	-2.82	-1.38	1.98	(A)	1.46	-0.86	-1.22	-2.54	8.99	0.00
MSW	1.77	6.38	-0.34	(A)	0.12	2.01	-0.78	-0.23	11.52	0.00
HHA	-9.72	2.29	2.87	(A)	-5.64	-0.11	-4.66	-9.39	2.42	0.00
Total	**-12.46**	**-2.03**	**12.93**	**(A)**	**5.19**	**29.90**	**-0.62**	**-16.19**	**43.10**	**0.00**

Source: Calculated Average Visit per Disciplines –NC Statistics In County

(A) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Year 1 Out of County	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	-4.06	-6.47	0.14	(A)	4.25	0.73	-3.03	-3.56	2.44	-3.88
PT	-3.18	-5.13	1.04	(A)	-1.30	7.51	-1.29	-3.43	4.69	-2.03
ST	-2.53	-5.81	-0.85	(A)	-1.79	12.52	2.28	-5.13	4.95	-2.18
OT	-4.13	-2.69	0.66	(A)	0.15	-2.17	-2.54	-3.85	7.68	-1.31
MSW	1.23	5.84	-0.88	(A)	-0.42	1.47	-1.32	-0.77	10.98	-0.54
HHA	-11.85	0.16	0.74	(A)	-7.77	-2.24	-6.79	-11.52	0.29	-2.13
Total	**-24.52**	**-14.10**	**0.86**	**(A)**	**-6.88**	**17.83**	**-12.68**	**-28.26**	**31.03**	**-12.07**

Source: Calculated Average Visit per Disciplines –NC Statistics Out of County

(A) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Year 1 Combined	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	-3.03	-5.44	1.17	(A)	5.28	1.76	-2.00	-2.53	3.47	-2.85
PT	-2.43	-4.38	1.79	(A)	-0.55	8.26	-0.54	-2.68	5.44	-1.28
ST	0.64	-2.64	2.32	(A)	1.38	15.69	5.45	-1.96	8.12	0.99
OT	-6.66	-5.22	-1.87	(A)	-2.38	-4.70	-5.07	-6.38	5.15	-3.84

MSW	1.35	5.96	-0.76	**(A)**	-0.30	1.59	-1.20	-0.65	11.10	-0.42
HHA	-11.54	0.47	1.05	**(A)**	-7.46	-1.93	-6.48	-11.21	0.60	-1.82
Total	**-21.67**	**-11.25**	**3.71**	**(A)**	**-4.03**	**20.68**	**-9.83**	**-25.41**	**33.88**	**-9.22**

Source: Calculated Average Visit per Disciplines –NC Statistics combined

(A) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Maxim s Duplicated Patients data was found on Application Page 68. The Maxim Average Visits per Discipline do not appear to follow any of the statistics averages for Mecklenburg County Agencies. The Summary table below reflects the variances specific to Agencies located in Mecklenburg County, outside Mecklenburg County but serving patients in Mecklenburg County and the combined in county and outside county statistic.

Year 2	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	670	5,902	417	(A)	449	397	468	719	14	555
PT	670	5,033	296	(A)	402	286	372	719	72	471
ST	42	294	21	(A)	35	30	24	21	6	19
OT	670	1,214	91	**(A)**	124	78	216	719	24	170
MSW	16	102	29	**(A)**	71	137	66	12	3	39
HHA	670	230	47	**(A)**	160	54	60	719	26	52
Total	**2,738**	**12,775**	**901**	**(A)**	**1,241**	**982**	**1,206**	**2,909**	**145**	**1,306**

Source: CON Applications

(A) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Year 2 Average Visit per Discipline:

Year 2	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	6.53	4.09	10.69	(A)	14.81	12.94	8.49	7.58	13.00	6.68
PT	5.16	3.18	9.35	(A)	7.01	18.24	8.29	5.30	8.67	6.28
ST	5.60	2.24	7.19	(A)	6.43	9.30	9.50	5.81	13.00	8.99
OT	1.19	2.63	6.00	**(A)**	5.45	9.21	3.28	1.60	13.00	4.01
MSW	3.19	7.87	1.17	**(A)**	1.59	4.06	0.73	3.92	13.00	1.48
HHA	0.87	12.90	13.23	**(A)**	4.93	12.26	8.60	1.32	14.00	10.58
Total	**22.53**	**32.92**	**47.64**	**(A)**	**40.22**	**66.01**	**38.88**	**25.52**	**74.67**	**38.02**

Source: Calculated Discipline Visits / Duplicated Patients

(A) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Year 2 In County	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	-1.12	-3.11	3.07	(A)	0.72	11.96	2.01	-0.98	2.38	0.00
PT	-3.39	-6.75	-1.80	(A)	-2.56	0.31	0.51	-3.18	4.01	0.00
ST	-2.82	-1.38	1.99	(A)	1.44	5.20	-0.73	-2.41	8.99	0.00
OT	1.71	6.39	-0.31	**(A)**	0.11	2.58	-0.75	2.43	11.52	0.00
MSW	-9.72	2.32	2.65	**(A)**	-5.65	1.68	-1.98	-9.27	3.42	0.00
HHA	-2.75	-2.48	3.30	**(A)**	2.86	6.58	0.87	-2.26	4.81	0.00
Total	**-18.09**	**-5.00**	**8.90**	**(A)**	**-3.08**	**28.30**	**-0.08**	**-15.66**	**35.13**	**0.00**

Source: Calculated Average Visit per Disciplines –NC Statistics In County

(A) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Year 2 Out of County	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	-3.15	-5.13	1.04	(A)	-1.30	9.93	-0.02	-3.01	0.36	-2.03
PT	-2.45	-5.81	-0.86	(A)	-1.62	1.25	1.45	-2.24	4.95	0.94
ST	-4.13	-2.69	0.68	(A)	0.13	3.89	-2.04	-3.72	7.68	-1.31
OT	1.17	5.85	-0.85	**(A)**	-0.43	2.04	-1.29	1.90	10.98	-0.54
MSW	-11.84	0.19	0.52	**(A)**	-7.78	-0.45	-4.11	-11.39	1.29	-2.13
HHA	3.47	3.74	9.52	**(A)**	9.08	12.80	7.09	3.96	11.03	6.22
Total	**-16.94**	**-3.85**	**10.06**	**(A)**	**-1.92**	**29.45**	**1.08**	**-14.50**	**36.28**	**1.16**

Source: Calculated Average Visit per Disciplines –NC Statistics Out of County

(A) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Year 2 Combined	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	-2.40	-4.38	1.79	(A)	-0.55	10.68	0.73	-2.26	1.11	-1.28
PT	0.72	-2.64	2.31	(A)	1.55	4.42	4.62	0.93	8.12	4.11
ST	-6.66	-5.22	-1.85	(A)	-2.40	1.36	-4.57	-6.25	5.15	-3.84
OT	1.29	5.97	-0.73	(A)	-0.31	2.16	-1.17	2.02	11.10	-0.42
MSW	-11.53	0.50	0.83	(A)	-7.47	-0.14	-3.80	-11.08	1.60	-1.82
HHA	3.47	3.74	9.52	(A)	9.08	12.80	7.09	3.96	11.03	6.22
Total	**-15.12**	**-2.03**	**11.88**	**(A)**	**-0.10**	**31.27**	**2.90**	**-12.68**	**38.10**	**2.98**

Source: Calculated Average Visit per Disciplines –NC Statistics combined

(A) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Maxim s Duplicated Patients data was found on Application Page 68. The Maxim Average Visits per Discipline do not appear to follow any of the statistics averages for Mecklenburg County Agencies . The Summary table below reflects the variances specific to Agencies located in Mecklenburg County, outside Mecklenburg County but serving patients in Mecklenburg Count and the combined in county and outside county statistic.

Summary:

Summary	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Year 1										
In County	**-12.46**	**-2.03**	**12.93**	**(A)**	**5.19**	**29.90**	**-0.62**	**-16.19**	**43.10**	**0.00**
Out of Co.	**-24.52**	**-14.10**	**0.86**	**(A)**	**-6.88**	**17.83**	**-12.68**	**-28.26**	**31.03**	**-12.07**
Combined	**-21.67**	**-11.25**	**3.71**	**(A)**	**-4.03**	**20.68**	**-9.83**	**-25.41**	**33.88**	**-9.22**
Year 2										
In County	**-18.09**	**-5.00**	**8.90**	**(A)**	**-3.08**	**28.30**	**-0.08**	**-15.66**	**35.13**	**0.00**
Out of Co.	**-16.94**	**-3.85**	**10.06**	**(A)**	**-1.92**	**29.45**	**1.08**	**-14.50**	**36.28**	**1.16**
Combined	**-15.12**	**-2.03**	**11.88**	**(A)**	**-0.10**	**31.27**	**2.90**	**-12.68**	**38.10**	**2.98**

As reflected in the summary Table above the Maxim Duplicated Patients Average Visit per Discipline is 15 to 18 visits less than the Mecklenburg County statistics. This reflects the projected patients receiving fewer services by discipline than the existing Agencies historically provide. Maxim states on Page 52 of the application that the Unduplicated Patients Projections are "based upon its corporate experience providing home health services via Medicare-certified agencies. Maxim has no experience providing home health services via Medicare-certified agencies in Mecklenburg County, NC and does not identify or specify how the Duplicated Patients were projected. In addition, Maxim projects that 100% of the proposed Agency Patients will come solely from Mecklenburg County. Therefore, Maxim should be utilizing the statistic for the Agency located in Mecklenburg County to make its projection . Vizion One believes that

Maxim is not the best applicant as the average visits per discipline are less than those current serving the Mecklenburg County patients. Vizion One believes it is the best applicant as it utilized the specific data relating Mecklenburg County without exception.

County of Origin:

County	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Mecklenburg	100.00%	84.60%	86.70%	100.00%	85.97%	100.00%	67.60%	90.00%	(A)	100.00%
Other	0.00%	15.40%	13.30%	0.00%	14.03%	0.00%	32.40%	10.00%		0.00%
Total	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**(A)**	**100.00%**

(A) Applicant did not provide any data related to this item.

Page 64, Maxim Application. As all of the Maxim patients will originate from Mecklenburg County the statistical basis should be based upon data for agencies located in Mecklenburg County, NC.

VI. *ACCESSIBILITY*

7. (b) Provide an estimate of the amount of charity care that will be provided, if any, in each of the first two years of operation of the project?

(c) Does this amount include bad debt? ___No __X___

If so, what amount is bad debt?

Charity Care /Bad Debt:

	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Year 1 in $	10,315	164,740	5,561	9,370	1,052	4,300	1,685	6,965	2,000	12,687
Year 2 in $	24,325	175,222	7,807	10,115	1,781	6,645	1,676	20,390	5,000	18,152
Year 1 % Gross	1.49%	1.21%	0.6%	0.91%	0.09%	0.35%	1.0%	1.0%	1.0%	1.4%
Year 2 % Gross	1.49%	1.21%	0.6%	0.91%	0.10%	0.33%	1.0%	0.95%	2.0%	1.4%
				%						
Total	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.0%**	**100.00%**	**100.00%**	**100.00%**

12. *For the proposed new home health agency office, please provide the following information for* ***the second year of operation*** *following completion of the project. If the applicant is proposing to develop a branch office or a subunit of an existing home health agency (i.e., the proposed office will use an existing provider number), the applicant may provide payor mix projections for the entire home health agency in an appendix. The payor mix projections in the following table should only include the patients projected to be served by the proposed new office. Provide all assumptions utilized in determining these figures. Note that a duplicated patient is counted for* *each* *service discipline rendered.*

Duplicated Patient by Payor Distribution:

Payor Source	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Medicare	67.9%	64.4%	58.3%	58.2%	60.0%	69.6%	58.0%	74.61%	89.0%	53.00%
Medicaid	15.5%	23.4%	20.0%	10.8%	20.0%	15.6%	10.7%	11.30%	0.0%	12.95%
Comm. Ins	15.7%	10.0%	18.8%	25.3%	15.0%	11.3%	27.1%	11.05%	1.0%	32.65%
Self-Pay	0.0%	1.0%	0.0%	4.2%	4.0%	0.0%	0.0%	1.52%	1.0%	0.00%
Charity	0.9%	1.2%	2.8%	1.4%	1.0%	0.5%	1.4%	1.52%	1.0%	1.40%
Other	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.8%	0.00%	8.0%	
Total	**100.0%**	**100.0%**	**99.9%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.00%**	**100.0%**	**100.00%**

Page 96, Maxim Application.

On page 70 of the application the applicant states, "Maxim projected payor mix is based on its experience operating a licensed home care agency in Mecklenburg County, as well as a review of the historical payor mix of the Medicare-certified home health agencies serving Mecklenburg County during 2011". The applicant goes on to state they, "typically served a high Medicaid Payor Mix and will actively market Medicaid patients". Maxim goes on to point out their plan to apply to become a provider for CCPGM the case management health care plan for the majority of Medicaid citizens of North Carolina.

The Patient Distribution for Maxim reflects Medicare patients 14.9% higher than the Average Medicare patient distribution for Medicare-certified home health agencies serving Mecklenburg County, historically. Vizion One has utilized the actual Average Patient Distribution for the Agencies in Mecklenburg County based upon the latest available data. In addition, the goal of becoming a CCPGM provider only projects an increase of 2.55 percent increase in Medicaid patients. It appears that Maxim is projecting higher Medicare percentages as payment rates are higher and more profitable and increased Medicaid projections enhance the appearance of the application rather than projects based upon historical data which reflect the market in the specific area. Vizion One believes that the Medicare and Medicaid patient projections are inflated and do not accurately reflect the market in Mecklenburg County based upon historical data.

Visit by Payor Distribution:

Payor Source	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Medicare	80.9%	72.0%	66.8%	67.7%	72.40%	77.9%	67.8%	79.36%	89.0%	52.98%
Medicaid	8.7%	16.2%	14.9%	8.2%	14.48%	7.4%	8.2%	9.20%	0.0%	12.92%
Comm. Ins	10.1%	9.20	15.8%	19.2%	9.44%	14.3%	20.9%	8.94%	1.0%	32.71%
Self-Pay		1.2%	0.0%	4.0%	3.57%	0.0%	0.0%	1.45%	1.0%	0.00%
Charity	0.4%	1.4%	0.0%	0.9%	0.11%	0.4%	0.9%	1.04%	1.0%	1.38%
Other		0.0%	2.4%	0.0%	0.00%	0.0%	2.2%	0.00%	8.0%	0.00%
Total	**100.1%**	**100.0%**	**99.9%**	**100.0%**	**100.00%**	**100.0%**	**100.0%**	**99.0%**	**100.0%**	**99.9%**

The Maxim application contained information identifying the Visit Distribution by Payor Source on application page 96. Vizion One has the same concerns with this distribution as the Duplicated Patient Distribution for the reasons specified above. The figures again reflect a high volume of Medicare and a Medicaid percentage lower than the historical Mecklenburg County average. Additionally, as discussed in the Duplicate Patient Section above, the reduction of Duplicated Patients by Discipline reduces the amount of services the patient receives. This further demonstrates that while Maxim is indicating an increase in Medicaid business the visits are actually being provided at a leve lower than the Mecklenburg County average. The goal appears to be increasing volume in Medicare and increasing profitability while the increasing Medicaid Payors but lowering the visits reducing losses while reflecting better Accessibility without the historical data to support it. The Vizion One percentages are the historical averages for Mecklenburg County.

Visit by Discipline Distribution:

Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	46.40%	50.57%	51.95%	50.01%	59.00%	38.00%	46.63%	47.51%	2.74%	45.60%
PT	36.10%	33.48%	32.26%	33.65%	25.00%	43.90%	36.29%	33.11%	35.62%	36.43%
ST	2.60%	1.38%	1.77%	2.00%	2.00%	2.20%	2.43%	0.94%	8.22%	2.14%
OT	8.30%	6.68%	6.36%	8.06%	6.00%	5.70%	8.07%	9.95%	21.92%	8.35%
MSW	0.60%	1.68%	0.39%	0.49%	1.00%	4.70%	0.55%	0.40%	1.37%	0.64%
HHA	6.00%	6.21%	7.26%	5.78%	7.00%	5.50%	6.03%	8.10%	30.14%	6.84%
				%						
Total	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.0%**	**100.00%**	**100.00%**	**100.00%**

Page78, Maxim Application.

The applicant utilized statistics for Mecklenburg County that they computed from the 2012 License Renewal Applications. Vizion One again believes this is the appropriate data to be utilized for Patient by Payor Source Distribution and Visits by Payor Source Distribution as it properly reflects historical and market data for Mecklenburg County.

Average Visits per Patient:

	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Year 1	17.28	15.96	21.68	17.50	19.06	22.94	17.24	18.28	18.98	25.03
Year 2	18.88	15.96	21.72	17.54	19.07	26.41	17.39	21.03	17.38	25.00
Variance	**-1.60**	**0.00**	**-0.03**	**-0.04**	**-0.01**	**-3.47**	**-0.15**	**-2.75**	**1.60**	**0.03**

The Average Visit per Patient was computed by dividing the projected Total Visits by the projected Unduplicated Patients Projected.

The Maxim Average Visit per Patient are not consistent between periods reflecting 1.6 more Visit per Patient in Year 2.

Pag 89, Maxim Application. No Comments.

Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	46.40%	50.57%	51.95%	50.01%	59.00%	38.00%	46.63%	47.51%	2.74%	45.60%
PT	36.10%	33.48%	32.26%	33.65%	25.00%	43.90%	36.29%	33.11%	35.62%	36.43%
ST	2.60%	1.38%	1.77%	2.00%	2.00%	2.20%	2.43%	0.94%	8.22%	2.14%
OT	8.30%	6.68%	6.36%	8.06%	6.00%	5.70%	8.07%	9.95%	21.92%	8.35%
MSW	0.60%	1.68%	0.39%	0.49%	1.00%	4.70%	0.55%	0.40%	1.37%	0.64%
HHA	6.00%	6.21%	7.26%	5.78%	7.00%	5.50%	6.03%	8.10%	30.14%	6.84%
				%						
Total	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.0%**	**100.00%**	**100.00%**	**100.00%**

VII *STAFFING*

2. (a) All applicants complete Table VII.2 for each of the first two years of operation after completion of the project.

Vizion One obtained the various components of the FTE computations submitted by the applicants and calculated the FTE's based upon that information for for each applicant. The computed FTE's were then compared to the FTE's reflected in each application. The computation utilized 260 work days per year to

compare all FTE's as the FTe's are reuoired to be computed based upon 2,080 hours each. (5 day week * 52 weeks = 260 days) and (260 days * 8 hrs day = 2,080 hrs).The computations also utilized the visits per day to determine the number of visits required to equate to one FTE and the hours per visit. The Visits by Discipline per each application were then divided by the total number of visits required per Discipline for one FTE to compute the FTE. A comparison was then made of the FTE's per Application to the calculated FTE's. The results for each year are as follows:

Visits per Week:

Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	25.0	20.0	25.0	25.0	27.5	25.0	22.50	22.35	20	25.0
LPN		27.5	29.5	25.0	0.0	25.0	29.00		15	
RN PRN		22.5								
PT	25.0	20.0	27.0	25.0	27.5	25.0	27.00	25.00	15	25.0
LPTA		27.5		25.0		25.0	27.00			
ST	25.0	20.0	26.5	25.0	27.5	25.0	22.00	1.65	10	25.0
OT	25.0	25.0	26.5	25.0	27.5	25.0	25.75	25.00	15	25.0
COTA		27.5					25.75			
MSW	17.5	20.0	15.0	17.5	20.0	25.0	16.50	17.00	5	15.0
HHA	27.0	27.5	26.0	30.0	32.5	25.0	27.00	25.00	15	25.0

*Source: Calculated Visits per Day * 5 Days Week*

Vist per Day:

Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	5		5.0	5.0	5.5	5	4.5	4.47	4	5
LPN			5.9	5		5	5.8		3	
RN PRN		4.0								
PT	5	5.5	5.4	5	5.5	5	5.4	5	3	5
LPTA		4.5		5		5	5.4			
ST	5	4.0	5.3	5	5.5	5	4.4	0.33	2	5
OT	5	5.5	5.3	5	5.5	5	5.15	5	3	5
COTA		4.0					5.15			
MSW	3.5	5.0	3.0	3.5	4	5	3.3	3.4	1	3
HHA	5.4	5.5	5.2	6	6.5	5	5.4	5	3	5

Source: CON Applications

Hours per Visit:

Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	1.6		1.6	1.6	1.5	1.6	1.8	1.8	2.0	1.6
LPN			1.4	1.6		1.6	1.4		2.7	
RN PRN		2.0								
PT	1.6	1.5	1.5	1.6	1.5	1.6	1.5	1.6	2.7	1.6
LPTA		1.8		1.6		1.6	1.5			
ST	1.6	2.0	1.5	1.6	1.5	1.6	1.8	24.2	4.0	1.6
OT	1.6	1.5	1.5	1.6	1.5	1.6	1.6	1.6	2.7	1.6
COTA		2.0								
MSW	2.3	1.6	2.7	2.3	2.0	1.6	2.4	2.4	8.0	2.7
HHA	1.56	1.5	1.5	1.3	1.2	1.6	1.5	1.6	2.7	1.6

Source: Calculated 8hrs a Day / 5Days a Week

Visit per Year:

Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	1,300		1,300	1,300	1,430	1,300	1,170	1,162.2	1,040	1,300
LPN			1,534	1,300		1,300	1,508		780	
RN PRN		1,040								
PT	1,300	1,430	1,404	1,300	1,430	1,300	1,404	1,300	780	1,300
LPTA		1,170		1,300		1,300	1,404			
ST	1,300	1,040	1,378	1,300	1,430	1,300	1,144	85.8	520	1,300
OT	1,300	1,430	1,378	1,300	1,430	1,300	1,339	1,300	780	1,300
COTA		1,040					1,339			
MSW	910	1,300	780	910	1,040	1,300	858	884	260	780
HHA	1,404	1,430	1,352	1,560	1,690	1,300	1,404	1,300	780	1,300

*Source: Calculated Visits per Day * 260 Days Year*

Visits per Application:

Year 1 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	3,392	23,171	3,177	2,853	4,251	3,106	595	1,772	26	2,408
PT	2,680	15,340	1,973	1,920	1,801	3,132	463	1,235	338	1,924
ST	182	632	108	114	144	432	31	35	78	113
OT	619	3,061	389	460	432	170	103	371	208	441
MSW	39	770	24	28	72	332	7	15	13	34
HHA	451	2,845	444	330	504	398	77	302	286	361
Total	**7,363**	**45,819**	**6,115**	**5,705**	**7,204**	**7,570**	**1,276**	**3,730**	**949**	**5,281**

Source: CON Applications

Year 2 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	4,376	24,162	4,457	3,080	6,648	5,138	3,972	5,449	182	3,707
PT	3,458	15,997	2,768	2,073	2,817	5,217	3,084	3,813	624	2,958
ST	235	659	151	123	225	279	228	122	78	173
OT	798	3,192	546	496	676	718	708	1,150	312	680
MSW	51	803	34	30	113	556	48	47	39	58
HHA	582	2,967	622	356	789	662	516	946	364	549
Total	**9,500**	**47,780**	**8,578**	**6,158**	**11,268**	**12,570**	**8,556**	**11,527**	**1,599**	**8,125**

Source: CON Applications

FTE'S for Comparison:

Year 1 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	2.61	22.28	2.44	2.19	2.97	2.39	0.51	1.52	0.03	1.85
PT	2.06	10.73	1.41	1.48	1.26	2.41	0.33	0.95	0.43	1.48
ST	0.14	0.54	0.08	0.09	0.10	0.33	0.03	0.41	0.15	0.09
OT	0.48	2.94	0.28	0.35	0.30	0.13	0.08	0.29	0.27	0.34
MSW	0.04	0.54	0.03	0.03	0.07	0.26	0.01	0.02	0.05	0.04
HHA	0.32	2.74	0.33	0.21	0.30	0.31	0.05	0.23	0.37	0.28

Total	5.65	39.76	4.57	4.36	5.00	5.82	1.01	3.42	1.29	4.08

Source: Calculated Discipline Visits / Visits per Year

Year 2 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	3.4	23.2	3.43	2.37	4.65	3.95	3.39	4.69	0.18	2.85
PT	2.7	11.2	1.97	1.59	1.97	4.01	2.20	2.93	0.80	2.28
ST	0.2	0.6	0.11	0.09	0.16	0.21	0.20	1.42	0.15	0.13
OT	0.6	3.1	0.40	0.38	0.47	0.55	0.53	0.88	0.40	0.52
MSW	0.1	0.6	0.04	0.03	0.11	0.43	0.06	0.05	0.15	0.07
HHA	0.4	2.9	0.46	0.23	0.47	0.51	0.37	0.73	0.47	0.42
Total	7.3	41.5	6.41	4.70	7.82	9.67	6.74	10.71	2.14	6.28

Source: Calculated Discipline Visits / Visits per Year

FTE's per Application:

Year 1 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	3.00	19.80	2.5	2.20	3.50	3.20	0.75	1.64	3.66	1.85
PT	2.25	11.00	1.5	1.48	1.30	3.20	0.41		4.66	1.48
ST	0.15	1.00	0.1	0.09	0.10	0.20	0.10		1.33	0.09
OT	0.50	2.50	0.3	0.35	0.03	0.45	0.05		3.33	0.34
MSW	0.10	1.00	0.03	0.03	0.10	0.35	0.02	0.17	0.16	0.04
HHA	0.40	2.50	0.5	0.21	0.04	0.40	0.07	0.25	4.66	0.28
Total	**6.40**	**37.80**	**4.93**	**4.36**	**5.07**	**7.80**	**1.40**	**2.06**	**17.8**	**4.08**

Source: CON Applications

Year 2 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	3.75	21.30	3.3	2.37	5.20	4.35	3.75	5.00	(A)	2.85
PT	2.75	14.70	2	1.60	2.00	4.40	2.58		(A)	2.28
ST	0.20	1.00	0.1	0.09	0.18	0.25	0.66		(A)	0.13
OT	0.75	2.50	0.4	0.38	0.50	0.60	0.25		(A)	0.52
MSW	0.10	1.00	0.04	0.03	0.02	0.45	0.25	0.3	(A)	0.07

HHA	0.50	2.50	0.5	0.23	0.06	0.55	0.48	0.8	(A)	0.42
Total	**8.05**	**43.00**	**6.34**	**4.70**	**7.96**	**10.60**	**7.97**	**6.10**	**(A)**	**6.27**

Source: CON Applications

FTE Variances:

Year 1 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	0.39	-2.48	0.06	0.01	0.53	0.81	0.24	0.12	3.64	0.00
PT	0.19	0.27	0.09	0.00	0.04	0.79	0.08	-0.95	4.23	0.00
ST	0.01	0.46	0.02	0.00	0.00	-0.13	0.07	-0.41	1.18	0.00
OT	0.02	-0.44	0.02	0.00	-0.27	0.32	-0.03	-0.29	3.06	0.00
MSW	0.06	0.46	0.00	0.00	0.03	0.09	0.01	0.15	0.11	0.00
HHA	0.08	-0.24	0.17	0.00	-0.26	0.09	0.02	0.02	4.29	0.00
Total	**0.75**	**-1.96**	**0.36**	**0.00**	**0.07**	**1.98**	**0.39**	**-1.36**	**16.51**	**0.00**

Source: Calculated FTE's for Comparison – FTE per CON Application

Year 2 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	0.38	-1.93	-0.13	0.00	0.55	0.40	0.36	0.31	(A)	0.00
PT	0.09	3.51	0.03	0.01	0.03	0.39	0.38	-2.93	(A)	0.00
ST	0.02	0.44	-0.01	0.00	0.02	0.04	0.46	-1.42	(A)	0.00
OT	0.14	-0.57	0.00	0.00	0.03	0.05	-0.28	-0.88	(A)	0.00
MSW	0.04	0.44	0.00	0.00	-0.09	0.02	0.19	0.25	(A)	0.00
HHA	0.09	-0.35	0.04	0.00	-0.41	0.04	0.11	0.07	(A)	0.00
Total	**0.76**	**1.53**	**-0.07**	**0.00**	**0.14**	**0.93**	**1.23**	**-4.61**	**(A)**	**-0.01**

Source: Calculated Source: Calculated FTE's for Comparison – FTE per CON Application

(A) No Year 2 FTE information in Application

- The Maxim comparison reflects variances between Disciplines in each year. The total variance represents three quarters of one FTE in both years. The Table below reflects the dollar amounts the variances equal per a comparison of FTE's per the above analysis and the actual amounts reflected in the Financial Projections for years one and two.

Year 1	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	(27,744)	97,517	(52,293)	4,188	(36,329)	(1,127,468)	(15,609)	(8,139)	(1,222,416)	0.00
PT	(15,143)	(174,946)	40,527	8,853	(3,285)	(1,308,168)	(6,508)	-	23,425	0.00
ST	(780)	(39,268)	-	(19)	(1,462)	(97,165)	(1,533)	-	8,735	0.00
OT	(1,761)	45,464	-	25	157	(213,748)	(1,483)	-	15,982	0.00
MSW	(2,754)	(9,610)	-	15	(1,385)	(155,807)	(861)	848	364	0.00
HHA	5,501	5,692	(5,148)	1	(3,180)	(70,891)	(364)	(557)	(335,413)	0.00
Total	**(42,682)**	**(75,150)**	**(87,682)**	**13,063**	**(45,484)**	**(2,973,248)**	**(26,358)**	**(7,847)**	**(1,509,324)**	**(1)**
%	**(0.09)**	**(0.03)**	**(0.38)**	**0.04**	**(0.12)**	**(0.89)**	**(0.27)**	**(0.6)**	**(A) (0.90)**	**0.0**

Source: Calculated Source: Calculated FTE's for Comparison Wages –Form B Wages per CON Application

(A) Incomplete Form B located in Application ST, MSW and Administrative Cost missing.

Year 1	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	(27,934)	131,045	52,619	4,667	(39,106)	(1,139,061)	(1,106)	(25,527)	(1,239,883)	2
PT	(7,412)	(185,030)	99,774	9,867	(2,509)	(1,276,598)	(16,138)	-	(74,900)	(1)
ST	(1,538)	(37,856)	-	(25)	(1,364)	(116,208)	(3,780)	-	-	(0)
OT	(10,308)	55,240	-	(1,713)	(2,107)	(204,103)	(10,398)	-	(33,964)	(2)
MSW	(46,627)	(9,266)	-	1,711	(4,234)	(157,511)	(10,726)	2,712	-	4
HHA	(2,847)	10,714	(1,231)	(5)	(4,286)	(72,525)	(2,493)	(1,781)	(374,664)	2
Total	**(96,665)**	**(35,154)**	**151,162**	**14,502**	**(53,605)**	**(2,966,005)**	**(44,640)**	**(24,596)**	**(1,723,411)**	**5**
%	**(0.15)**	**(0.01)**	**0.49**	**0.04**	**(0.09)**	**(0.79)**	**(0.09)**	**(0.06)**	**(A) (1.00)**	**0.00**

Source: Calculated Source: Calculated FTE's for Comparison Wages –Form B Wages per CON Application

(A) Incomplete Form B located in Application ST, MSW and Administrative Cost missing. No computations could be made as no Year 2 FTE information was contained in the application.

The negative amounts reflect analysis computations are less than wage amounts projected in the Form B Financial Statement. The negative amount indicated the applicant has overstated the expense for Discipline Wages. Again, Vizion One believes that in addition to over projection of FTE's and the resulting dollar amounts, all applicants are using wage estimates greater than the amounts applicable specifically to Mecklenburg County, NC as specified by the US Bureau of Labor 2011 Statistics Occupational Employment and Wages Estimates for Charlotte-Gastonia-Rock Hill, NC-SC. Vizion One utilizes the data as it was specific for the identified need area not a national average.

Position Average Salary for a full Time Employee:

Year 1 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	70,999	63,637	68,770	69,000	68,900	59760	64,645	71,000	58,233	62,504
LPN		36,293	47,000	44,100		39250	42,711		92,207	
RN PRN		64,047								
PT	80,353	83,197	100,000	81,500	81,000	67213	82,494		203,826	77,376
LPTA		74,508		56,000		47,750	51,385			
ST	78,014	85,396		75,500	75,000	83,495	73,089		58,233	69,014
OT	73,856	71,129		76,700	75,000	65,984	77,120		145,593	78,749
COTA		57,194					59,108			
MSW	48,190	20,821		50,377	45,000	65,617	54,190	50,000	7,276	44,741
HHA	32,500	29,419	30,000	29,000	31,250	26,270	21,110	32,250	97,060	20,155

Source: CON Applications

Year 2 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	72,774	64,591	70,627	71,070	70,967	73,987	65,938	72,420		64,067
LPN		36,838	48,269	45,423		40,035	43,627			
RN PRN		65,088								
PT	82,362	84,445	102,700	83,945	83,430	94,585	84,144			79,310
LPTA		75,626		57,680		48,705	52,413			
ST	79,964	86,677		77,765	77,250	112,828	74,551			70,740
OT	75,702	72,196		79,001	77,250	83,785	78,663			80,718
COTA		58,052					60,290			
MSW	49,395	21,134		51,888	46,350	86,872	55,274	51,000		45,917
HHA	33,313	30,363	30,810	29,870	32,188	32,493	21,532	32,895		20,659

Source: CON Applications

Year 2 Discipline	BLS Mean
RN	62,504
LPN	41,640

RN PRN	62,504
PT	77,376
LPTA	51,960
ST	69,014
OT	78,749
COTA	55,640
MSW	44,741
HHA	20,155

Source: BLS May 2011 Metropolitan and Non-metropolitan Area Occupational Employment and Wage Estimates, Charlotte-Gastonia-Rock Hill NC-SC

Wage Variances:

Year 2 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	1.14	1.02	1.10	1.10	1.10	0.96	1.03	1.14	0.93	1.00
LPN		0.87	1.13	1.06		0.94	1.03		2.21	1.00
RN PRN		1.02								1.00
PT	1.04	1.08	1.29	1.05	1.05	0.87	1.07		2.63	1.00
LPTA		1.43		1.08		0.92	0.99			1.00
ST	1.13	1.24		1.09	1.09	1.21	1.06		0.84	1.00
OT	0.94	0.90		0.97	0.95	0.84	0.98		1.85	1.00
COTA		1.03					1.06			1.00
MSW	1.08	0.47		1.13	1.01	1.47	1.21	1.12	0.16	1.00
HHA	1.61	1.46	1.49	1.44	1.55	1.30	1.05	1.60	4.82	1.00

Source: Calculated Position Average Salary for a full Time Employee /2011 BLS Wage Estimate

Vizion One questions the accuracy of the "Position Average Salary for a full Time Employee" used by Maxim. As reflected above The Mean Salaries for employees in these positions is substantially lower than those projected by Maxim per the 2011 BLS Employment and Wage Estimates for the Mecklenburg County area. Vizion One believes the Projected Average Salaries are inflated and do not accurately reflect the wages in Mecklenburg County area.

As explained above the Maxim application FTE projections overstate its FTE's and therefore overstates expenses on that basis alone. Vizion One believes they further overstates expenses by utilizing the NAHC Wage data as it reflects a national average not an area specific amount. Vizion One on the other hand has consistently utilized data specific to Mecklenburg County throughout its application.

VIII. CAPITAL COSTS AND FINANCING

1. Estimated Capital Costs of Proposed Project

N.C.G.S. 131E-176 (2a) defines a capital expenditure as an expenditure which under generally accepted accounting principles is not properly chargeable as an expense of operation and maintenance. In A, B and C below, provide the projected capital costs as follows:

(a) For a proposed new home health agency office, the applicant must use the most accurate estimates available for the development of the entire project.

(b) For an expansion or renovation of an existing home care agency, the applicant must use the most accurate estimates available for the development of the proposed addition or the renovation.

Capital Cost	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Construction Cost		245,500								
Equip/Computers	15,000	15,000	9,900	27,710	40,000	51,260	38,480	101,260	3,000	10,383
Furniture	10,000	49,500	10,000	4,164	20,000	23,953	11,440	22,100	3,000	4,910
Architect/Engineering		25,000								
Legal Fees						10,000				
Mkt Analysis						2,000				
CON Prep	40,000	65,000	42,500	-	35,000	19,500	750	55,000		40,000
Other		20,000				5,000	41,600			59,806
Contiengcy		30,000			15,000			17,836		
Total	**65,000**	**450,000**	**62,400**	**31,874**	**110,000**	**111,713**	**92,270**	**196,196**	**6,000**	**115,099**

Source: CON Applications

Vizion One has no comments at this time.

IX. START-UP AND INITIAL OPERATING EXPENSES/FINANCING

1. Estimated Start-up Expenses
2. Estimated Initial Operating Expenses
3. Total Working Capital

Start-up & Operating Expenses	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Startup	40,000		122,137	65,966	70,000	102,283	42,826	171,554	20,000	99,807
Initial Operating Exp	225,000		31,,455	341,220	480,000	646,38	247,565	539,614	30,000	361,496
Initial Operating Period	6	0	9	6	6	3	12	19	1	7
Total Working Capital	265,000	0	153,592	407,186	550,000	1669,21	290,391	711,168	50,000	461,303

Source CON Applications

Vizion One has no comments at this time.

X. COST INFORMATION

1. All applicants must complete Table X.1 to show the following:
*Your existing licensed home care agency's **cost** per unit of care (visit or hour) during the current year of operation, by discipline, and the total **cost** per visit, by discipline, for the two years following completion of the proposed home health agency.*

Yr. 1 Cost per Visit	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	82.84	154.24	86.71	137.22	144.71	91.9	605.48	292.17	122,3873	132.01
PT	88.26	137.57	91.60	146.78	146.81	82.4	224.52	214.39	36,795	160.51
ST	84.56	179.81	75.00	146.84	151.89	123.12	332.90	214.39	8,491	144.49
OT	79.23	131.12	75.00	155.11	139.06	88.98	225.15	214.39	62,643	163.15
MSW	151.57	86.72	75.00	170.27	151.76	89.92	530.46	837.71	1,334	155.12
HHA	43.45	50.38	71.87	86.9	105.76	47.85	146.91	172.19	49,002	50.85

Source CON Applications

Yr. 2 Cost per Visit	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	82.35	158.38	88.96	137.95	135.77	93.38	165.26	169.2	1239883	115.02
PT	85.98	139.15	88.81	147.8	140.27	84.03	147.73	134.33	67929	139.86
ST	89.08	179.78	75.00	147.86	141.34	125.56	148.62	134.33	8491	125.9
OT	92.49	131.24	75.00	156.38	137.72	90.73	140.28	134.33	33964	142.16
MSW	122.65	87.15	75.00	171.99	168.05	91.7	499.63	408.8	4246	135.17
HHA	43.21	86.80	60.68	86.12	97.5	48.78	58.84	91.39	52664	44.27

Source CON Applications

Historical Cost per Visit:

2010 Cost per Visit	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN		166.26	98.11			129.35				
PT		148.27	152.5			110.9				
ST		204.44	107.84			177.81				
OT		168.10	182.25			122.97				
MSW		2000.33	362.36			117.84				
HHA		68.84	59.69			48.26				

Source: 2010 CMS HCRIS HHA Cost Reports, Updated 1/23/12

Historical Cost per Visit Variance:

	Year 1				Year 2		
2010 Cost per Visit	Health @ Home	HKZ	Emerald Care		Health @ Home	HKZ	Emerald Care
RN	-12.02	-11.40	-37.45		-7.88	-9.15	-35.97
PT	-10.7	-60.90	-28.5		-9.12	-63.69	-26.87
ST	-24.63	-32.84	-54.69		-24.66	-32.84	-52.25
OT	-36.98	-107.25	-33.99		-36.86	-107.25	-32.24
MSW	-1913.61	-287.36	-27.92		-1913.18	-287.36	-26.14
HHA	-18.46	12.18	-0.41		17.96	0.99	0.52

Source: Calculated Projected Cost per Visit – Historical Cost per Visit

Three Applicants have a history of services in Mecklenburg County. All three project Cost per Visits lower than their historical Cost per Visit for established Agencies which currently provide services in Mecklenburg County. Healthy @ Home served 327.8% more patients than its project year two projection. HKZ served 311.4% more patients in year two than it projects and Emerald Care served 401.5% more than it projects. Additionally, the CMS data reflects Healthy @ Home average visits per patient at 7.72 in 2010 while it projects 15.96 for this project. CMS data reflects average visit per patient for HKZ at 17.35 in 2010 while it projects 21.72 this project. Emerald Cares CMS data reflects 28.01 in 2010 while it projects 26.41 for this project. These three applicants are inconsistent with their historical data when making the projections for this project.

The J & D Health Care reflects what appears to be Total Cost by discipline and does not reflect the information required for this section.

2. *CHARGE INFORMATION*

Complete Table X.2

Charges per Visit	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	125	125	130	169	135	125	150	165	1223873	160
PT	130	125	145	180	135	141	150	175	36795	165
ST	130	125	145	169	145	142	150	175	8491	165
OT	130	125	145	169	145	142	150	175	62643	165
MSW	175	165	190	327	350	186	150	195	1334	180
HHA	70	60	65	82	70	65	95	65	49002	90

Source: CON Applications

The J & D Health Care reflects what appears to be Gross Revenues by discipline and does not reflect the information required for this section

No further comments at this time.

VIZION ONE HOME HEALTH
COMPETING APPLICATION COMMENTS
MECKLENBURG COUNTY, NC CON APPLICATIONS
HEALTH @ HOME – CAROLINAS MEDICAL CENTER
F-10004-12

10A NCAC 14C .2003 PERFORMANCE STANDARDS
An applicant shall project, in the third year of operation, an annual unduplicated patient caseload for the county in which the facility will be located that meets or exceeds the minimum need used in the applicable State Medical Facilities Plan to justify the establishment of a new home health agency office in that county. An applicant shall not be required to meet this performance standard if the home health agency office need determination in the applicable State Medical Facilities Plan was not based on application of the standard methodology for a Medicare-certified home health agency office.

Unduplicated Patients and Growth:

Patients	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Year 1	426	2,870	282	326	378	330	74	204	50	211
Year 2	503	2,993	395	351	591	476	492	548	92	325
Year 3	516	0	416	0	821	0	0	548	0	348
Growth										
Year 2 to 2	118%	104%	140%	108%	156%	144%	665%	269%	184%	154%
Year 2 to 3	103%	Not Proj.	105%	Not Proj.	139%	Not Proj.	Not Proj.	0%	Not Proj.	107%

Source: CON Applications

Unduplicated Census found on Page 84 of the Health @ Home Application. The Unduplicated Census drastically exceeds the published need for Mecklenburg County. The Health @ Home Application reflects two years projections. While the Health @ Home Application is for expansion it already has an operating Agency in Mecklenburg County. Health @ Home needs no further approval to open an additional office in Mecklenburg County. Health @ Home states on page 46 of the Application it "is the second largest single-office home health agency operating in North Carolina." Exhibit 3 on page 47 identifies Health @ Home as the third largest Home Health in North Carolina. Health @ Home goes on to specify that Advanced Home Care in Gilford County is larger and Gentiva serves two counties which operate out of three and four offices serving the counties.

Application Pages 43 and 44 specify that "CHMC is not proposing to establish a new home health agency pursuant to a need determination in the SMFP…" Therefore, the Health @ Home Application should not be included in the CON Review process and should not be considered in the process of granting any CON.

IV. *UTILIZATION*

3. *Provide the projected number of unduplicated patients for the initial two years after completion of the proposed project. Patients should be counted only under the admitting service discipline. In Table IV.1, include only the unduplicated patients projected to be served by the proposed new home health agency office. If the applicant is proposing to develop a branch office or a subunit of an existing home health agency (i.e., the proposed office will use an existing provider number) and the applicant wishes to provide utilization data for the entire home health agency, please provide it in an appendix. The utilization data in Table IV.1 should include only the patients projected to be served by the new office*

Unduplicated Patient Distribution Projections:

Patients	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	66.67%	70.98%	65.00%	(A)	65.00%	71.21%	67.00%	89.00%	4.00%	54.14%
PT	33.33%	28.75%	35.00%	(A)	35.00%	28.24%	33.00%	11.00%	52.00%	43.34%
ST	0.00%	0.28%	0.00%	(A)	0.00%	0.31%	0.00%	0.00%	12.00%	2.52%
Total	**100.00%**	**100.01%**	**100.00%**	**(A)**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**68.00%**	**100.00%**
									(B)	
OT									32.00%	
Total	**100.00%**	**100.01%**	**100.00%**	**(A)**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**

Source CON Applications

(C) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix.
(D) Applicant allocated Unduplicated Patients to OT which is not an admitting discipline.

Unduplicated Census Distribution is found on Page 84 of the Health @ Home Application.

Application Pages 43 and 44 specify that "CHMC is not proposing to establish a new home health agency pursuant to a need determination in the SMFP…" Therefore, the Health @ Home Application should not be included in the CON Review process and should not be considered in the process of granting any CON.

4. *Provide projected monthly utilization data, including the projected number of duplicated home health patients and visits for the initial two years after completion of the proposed project. In Table IV.2, include only the duplicated patients projected to be served by the proposed home health agency office. In Table IV.2, include only the duplicated patients projected to be served by the proposed home health agency office. If the applicant is proposing to develop a branch office or a subunit of an existing home health agency (i.e., the proposed office will use an existing provider number) and the applicant wishes to provide utilization data for the entire home health agency, please provide it in an appendix. The utilization data in Table IV.2 should include only the patients projected to be served by the proposed new office.*

Vizion One obtained the Duplicated Patients submitted by the applicants and calculated the Average visit per Discipline for each applicant. The Average Visits per Discipline were then compared to the Mecklenburg County statistics for existing agencies located in the county, agencies located outside the county and serving Mecklenburg County and then combined. The results for each year are as follows:

Duplicated Patients:

Duplicated Year 1	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	522	5,660	297	(A)	287	275	79	253	2	361
PT	522	4,827	211	(A)	257	198	66	253	26	306
ST	33	282	15	(A)	23	21	3	12	6	19
OT	522	1,164	65	**(A)**	79	54	37	253	16	110
MSW	12	98	21	**(A)**	45	95	10	12	1	23
HHA	522	221	33	**(A)**	102	38	13	253	22	34
Total	**2,133**	**12,252**	**642**	**(A)**	**793**	**681**	**208**	**1,036**	**73**	**853**

Source: CON Applications

(B) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Year 1 Average Visit per Discipline:

Year 1	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	6.50	4.09	10.70	(A)	14.81	11.29	7.53	7.00	13.00	6.68
PT	5.13	3.18	9.35	(A)	7.01	15.82	7.02	4.88	13.00	6.28
ST	5.52	2.24	7.20	(A)	6.26	20.57	10.33	2.92	13.00	5.87
OT	1.19	2.63	5.98	**(A)**	5.47	3.15	2.78	1.47	13.00	4.01
MSW	3.25	7.86	1.14	**(A)**	1.60	3.49	0.70	1.25	13.00	1.48
HHA	0.86	12.87	13.45	**(A)**	4.94	10.47	5.92	1.19	13.00	10.58
Total	**22.45**	**32.87**	**47.83**	**0.00**	**40.09**	**64.80**	**34.29**	**18.71**	**78.00**	**34.90**

Source: Calculated Discipline Visits / Duplicated Patients

(B) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

NC Statistics:

	In County	Outside County	Combined In County & Outside County
SN	6.68	10.56	9.53
PT	6.28	8.31	7.56
ST	5.87	8.05	4.88
OT	4.01	5.32	7.85
MSW	1.48	2.02	1.90
HHA	10.58	12.71	12.40

Source: NC Division of Health Services, Medical Facilities Planning Section, Home Health Database, Updated 7/26/2011, tblStaff.

Variances:

Year 1 In County	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	-0.18	-2.58	4.02	**(A)**	8.13	4.62	0.85	0.33	6.32	0.00
PT	-1.15	-3.11	3.07	**(A)**	0.72	9.53	0.73	-1.40	6.72	0.00
ST	-0.35	-3.63	1.33	**(A)**	0.39	14.70	4.46	-2.95	7.13	0.00
OT	-2.82	-1.38	1.98	**(A)**	1.46	-0.86	-1.22	-2.54	8.99	0.00
MSW	1.77	6.38	-0.34	**(A)**	0.12	2.01	-0.78	-0.23	11.52	0.00
HHA	-9.72	2.29	2.87	**(A)**	-5.64	-0.11	-4.66	-9.39	2.42	0.00
Total	**-12.46**	**-2.03**	**12.93**	**(A)**	**5.19**	**29.90**	**-0.62**	**-16.19**	**43.10**	**0.00**

Source: Calculated Average Visit per Disciplines –NC Statistics In County

(B) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Year 1 Out of County	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	-4.06	-6.47	0.14	(A)	4.25	0.73	-3.03	-3.56	2.44	-3.88
PT	-3.18	-5.13	1.04	(A)	-1.30	7.51	-1.29	-3.43	4.69	-2.03
ST	-2.53	-5.81	-0.85	(A)	-1.79	12.52	2.28	-5.13	4.95	-2.18
OT	-4.13	-2.69	0.66	**(A)**	0.15	-2.17	-2.54	-3.85	7.68	-1.31
MSW	1.23	5.84	-0.88	**(A)**	-0.42	1.47	-1.32	-0.77	10.98	-0.54
HHA	-11.85	0.16	0.74	**(A)**	-7.77	-2.24	-6.79	-11.52	0.29	-2.13
Total	**-24.52**	**-14.10**	**0.86**	**(A)**	**-6.88**	**17.83**	**-12.68**	**-28.26**	**31.03**	**-12.07**

Source: Calculated Average Visit per Disciplines –NC Statistics Out of County

(B) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Year 1 Combined	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	-3.03	-5.44	1.17	(A)	5.28	1.76	-2.00	-2.53	3.47	-2.85
PT	-2.43	-4.38	1.79	(A)	-0.55	8.26	-0.54	-2.68	5.44	-1.28
ST	0.64	-2.64	2.32	(A)	1.38	15.69	5.45	-1.96	8.12	0.99
OT	-6.66	-5.22	-1.87	**(A)**	-2.38	-4.70	-5.07	-6.38	5.15	-3.84
MSW	1.35	5.96	-0.76	**(A)**	-0.30	1.59	-1.20	-0.65	11.10	-0.42
HHA	-11.54	0.47	1.05	**(A)**	-7.46	-1.93	-6.48	-11.21	0.60	-1.82
Total	**-21.67**	**-11.25**	**3.71**	**(A)**	**-4.03**	**20.68**	**-9.83**	**-25.41**	**33.88**	**-9.22**

Source: Calculated Average Visit per Disciplines –NC Statistics combined

(B) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Application Pages 43 and 44 specify that "CHMC is not proposing to establish a new home health agency pursuant to a need determination in the SMFP…" Therefore, the Health @ Home Application should not be included in the CON Review process and should not be considered in the process of granting any CON.

Duplicated Year 2	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	670	5,902	417	(A)	449	397	468	719	14	555
PT	670	5,033	296	(A)	402	286	372	719	72	471
ST	42	294	21	(A)	35	30	24	21	6	19
OT	670	1,214	91	**(A)**	124	78	216	719	24	170
MSW	16	102	29	**(A)**	71	137	66	12	3	39
HHA	670	230	47	**(A)**	160	54	60	719	26	52
Total	**2,738**	**12,775**	**901**	**(A)**	**1,241**	**982**	**1,206**	**2,909**	**145**	**1,306**

Source: CON Applications

(B) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Year 2 Average Visit per Discipline:

Year 2	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	6.53	4.09	10.69	(A)	14.81	12.94	8.49	7.58	13.00	6.68
PT	5.16	3.18	9.35	(A)	7.01	18.24	8.29	5.30	8.67	6.28
ST	5.60	2.24	7.19	(A)	6.43	9.30	9.50	5.81	13.00	8.99
OT	1.19	2.63	6.00	**(A)**	5.45	9.21	3.28	1.60	13.00	4.01
MSW	3.19	7.87	1.17	**(A)**	1.59	4.06	0.73	3.92	13.00	1.48
HHA	0.87	12.90	13.23	**(A)**	4.93	12.26	8.60	1.32	14.00	10.58
Total	**22.53**	**32.92**	**47.64**	**(A)**	**40.22**	**66.01**	**38.88**	**25.52**	**74.67**	**38.02**

Source: Calculated Discipline Visits / Duplicated Patients

(B) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Year 2 In County	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	-1.12	-3.11	3.07	(A)	0.72	11.96	2.01	-0.98	2.38	0.00
PT	-3.39	-6.75	-1.80	(A)	-2.56	0.31	0.51	-3.18	4.01	0.00
ST	-2.82	-1.38	1.99	(A)	1.44	5.20	-0.73	-2.41	8.99	0.00
OT	1.71	6.39	-0.31	**(A)**	0.11	2.58	-0.75	2.43	11.52	0.00
MSW	-9.72	2.32	2.65	**(A)**	-5.65	1.68	-1.98	-9.27	3.42	0.00
HHA	-2.75	-2.48	3.30	**(A)**	2.86	6.58	0.87	-2.26	4.81	0.00
Total	**-18.09**	**-5.00**	**8.90**	**(A)**	**-3.08**	**28.30**	**-0.08**	**-15.66**	**35.13**	**0.00**

Source: Calculated Average Visit per Disciplines –NC Statistics In County

(B) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Year 2 Out of County	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	-3.15	-5.13	1.04	(A)	-1.30	9.93	-0.02	-3.01	0.36	-2.03
PT	-2.45	-5.81	-0.86	(A)	-1.62	1.25	1.45	-2.24	4.95	0.94
ST	-4.13	-2.69	0.68	(A)	0.13	3.89	-2.04	-3.72	7.68	-1.31
OT	1.17	5.85	-0.85	**(A)**	-0.43	2.04	-1.29	1.90	10.98	-0.54

MSW	-11.84	0.19	0.52	**(A)**	-7.78	-0.45	-4.11	-11.39	1.29	-2.13
HHA	3.47	3.74	9.52	**(A)**	9.08	12.80	7.09	3.96	11.03	6.22
Total	**-16.94**	**-3.85**	**10.06**	**(A)**	**-1.92**	**29.45**	**1.08**	**-14.50**	**36.28**	**1.16**

Source: Calculated Average Visit per Disciplines –NC Statistics Out of County

(B) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Year 2 Combined	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	-2.40	-4.38	1.79	(A)	-0.55	10.68	0.73	-2.26	1.11	-1.28
PT	0.72	-2.64	2.31	(A)	1.55	4.42	4.62	0.93	8.12	4.11
ST	-6.66	-5.22	-1.85	(A)	-2.40	1.36	-4.57	-6.25	5.15	-3.84
OT	1.29	5.97	-0.73	**(A)**	-0.31	2.16	-1.17	2.02	11.10	-0.42
MSW	-11.53	0.50	0.83	**(A)**	-7.47	-0.14	-3.80	-11.08	1.60	-1.82
HHA	3.47	3.74	9.52	**(A)**	9.08	12.80	7.09	3.96	11.03	6.22
Total	**-15.12**	**-2.03**	**11.88**	**(A)**	**-0.10**	**31.27**	**2.90**	**-12.68**	**38.10**	**2.98**

Source: Calculated Average Visit per Disciplines –NC Statistics combined

(B) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Summary:

Summary	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Year 1										
In County	**-12.46**	**-2.03**	**12.93**	**(A)**	**5.19**	**29.90**	**-0.62**	**-16.19**	**43.10**	**0.00**
Out of Co.	**-24.52**	**-14.10**	**0.86**	**(A)**	**-6.88**	**17.83**	**-12.68**	**-28.26**	**31.03**	**-12.07**
Combined	**-21.67**	**-11.25**	**3.71**	**(A)**	**-4.03**	**20.68**	**-9.83**	**-25.41**	**33.88**	**-9.22**
Year 2										
In County	**-18.09**	**-5.00**	**8.90**	**(A)**	**-3.08**	**28.30**	**-0.08**	**-15.66**	**35.13**	**0.00**
Out of Co.	**-16.94**	**-3.85**	**10.06**	**(A)**	**-1.92**	**29.45**	**1.08**	**-14.50**	**36.28**	**1.16**
Combined	**-15.12**	**-2.03**	**11.88**	**(A)**	**-0.10**	**31.27**	**2.90**	**-12.68**	**38.10**	**2.98**

Applications 43 and 44 specify that "CHMC is not proposing to establish a new home health agency pursuant to a need determination in the SMFP…" Therefore, the Health @ Home Application should not be included in the CON Review process and should not be considered in the process of granting any CON

County of Origin:

County	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Mecklenburg	100.00%	84.60%	86.70%	100.00%	85.97%	100.00%	67.60%	90.00%	(A)	100.00%
Other	0.00%	15.40%	13.30%	0.00%	14.03%	0.00%	32.40%	10.00%		0.00%
Total	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**(A)**	**100.00%**

(B) Applicant did not provide any data related to this item.

Application Pages 43 and 44 specify that "CHMC is not proposing to establish a new home health agency pursuant to a need determination in the SMFP…" Therefore, the Health @ Home Application should not be included in the CON Review process and should not be considered in the process of granting any CON.

VI. *ACCESSIBILITY*

7. (b) Provide an estimate of the amount of charity care that will be provided, if any, in each of the first two years of operation of the project?

(c) Does this amount include bad debt? ___No __X___

If so, what amount is bad debt?

Charity Care /Bad Debt:

	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Year 1 in $	10,315	164,740	5,561	9,370	1,052	4,300	1,685	6,965	2,000	12,687
Year 2 in $	24,325	175,222	7,807	10,115	1,781	6,645	1,676	20,390	5,000	18,152
Year 1 % Gross	1.49%	1.21%	0.6%	0.91%	0.09%	0.35%	1.0%	1.0%	1.0%	1.4%
Year 2 % Gross	1.49%	1.21%	0.6%	0.91%	0.10%	0.33%	1.0%	0.95%	2.0%	1.4%
				%						
Total	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.0%**	**100.00%**	**100.00%**	**100.00%**

Applications 43 and 44 specify that "CHMC is not proposing to establish a new home health agency pursuant to a need determination in the SMFP…" Therefore, the Health @ Home Application should not be included in the CON Review process and should not be considered in the process of granting any CON.

12. *For the proposed new home health agency office, please provide the following information for* ***the second year of operation*** *following completion of the project. If the applicant is proposing to develop a branch office or a subunit of an existing home health agency (i.e., the proposed office will use an existing provider number), the applicant may provide payor mix projections for the entire home health agency in an appendix. The payor mix projections in the following table should only include the patients projected to be served by the proposed new office. Provide all assumptions utilized in determining these figures. Note that a duplicated patient is counted for* *each* *service discipline rendered.*

Duplicated Patient by Payor Distribution:

Payor Source	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Medicare	67.9%	64.4%	58.3%	58.2%	60.0%	69.6%	58.0%	74.61%	89.0%	53.00%
Medicaid	15.5%	23.4%	20.0%	10.8%	20.0%	15.6%	10.7%	11.30%	0.0%	12.95%
Comm. Ins	15.7%	10.0%	18.8%	25.3%	15.0%	11.3%	27.1%	11.05%	1.0%	32.65%
Self-Pay	0.0%	1.0%	0.0%	4.2%	4.0%	0.0%	0.0%	1.52%	1.0%	0.00%
Charity	0.9%	1.2%	2.8%	1.4%	1.0%	0.5%	1.4%	1.52%	1.0%	1.40%
Other	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.8%	0.00%	8.0%	
Total	**100.0%**	**100.0%**	**99.9%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.00%**	**100.0%**	**100.00%**

Application Pages 43 and 44 specify that "CHMC is not proposing to establish a new home health agency pursuant to a need determination in the SMFP…" Therefore, the Health @ Home Application should not be included in the CON Review process and should not be considered in the process of granting any CON.

Visit by Payor Distribution:

Payor Source	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Medicare	80.9%	72.0%	66.8%	67.7%	72.40%	77.9%	67.8%	79.36%	89.0%	52.98%
Medicaid	8.7%	16.2%	14.9%	8.2%	14.48%	7.4%	8.2%	9.20%	0.0%	12.92%
Comm. Ins	10.1%	9.20	15.8%	19.2%	9.44%	14.3%	20.9%	8.94%	1.0%	32.71%
Self-Pay		1.2%	0.0%	4.0%	3.57%	0.0%	0.0%	1.45%	1.0%	0.00%
Charity	0.4%	1.4%	0.0%	0.9%	0.11%	0.4%	0.9%	1.04%	1.0%	1.38%
Other		0.0%	2.4%	0.0%	0.00%	0.0%	2.2%	0.00%	8.0%	0.00%
Total	**100.1%**	**100.0%**	**99.9%**	**100.0%**	**100.00%**	**100.0%**	**100.0%**	**99.0%**	**100.0%**	**99.9%**

Application Pages 43 and 44 specify that "CHMC is not proposing to establish a new home health agency pursuant to a need determination in the SMFP…" Therefore, the Health @ Home Application should not be included in the CON Review process and should not be considered in the process of granting any CON.

Visit by Discipline Distribution:

Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	46.40%	50.57%	51.95%	50.01%	59.00%	38.00%	46.63%	47.51%	2.74%	45.60%
PT	36.10%	33.48%	32.26%	33.65%	25.00%	43.90%	36.29%	33.11%	35.62%	36.43%
ST	2.60%	1.38%	1.77%	2.00%	2.00%	2.20%	2.43%	0.94%	8.22%	2.14%
OT	8.30%	6.68%	6.36%	8.06%	6.00%	5.70%	8.07%	9.95%	21.92%	8.35%
MSW	0.60%	1.68%	0.39%	0.49%	1.00%	4.70%	0.55%	0.40%	1.37%	0.64%
HHA	6.00%	6.21%	7.26%	5.78%	7.00%	5.50%	6.03%	8.10%	30.14%	6.84%
				%						
Total	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.0%**	**100.00%**	**100.00%**	**100.00%**

Application Pages 43 and 44 specify that "CHMC is not proposing to establish a new home health agency pursuant to a need determination in the SMFP..." Therefore, the Health @ Home Application should not be included in the CON Review process and should not be considered in the process of granting any CON.

Average Visits per Patient:

	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Year 1	17.28	15.96	21.68	17.50	19.06	22.94	17.24	18.28	18.98	25.03
Year 2	18.88	15.96	21.72	17.54	19.07	26.41	17.39	21.03	17.38	25.00
Variance	**-1.60**	**0.00**	**-0.03**	**-0.04**	**-0.01**	**-3.47**	**-0.15**	**-2.75**	**1.60**	**0.03**

The Average Visit per Patient was computed by dividing the projected Total Visits by the projected Unduplicated Patients Projected.

Application Pages 43 and 44 specify that "CHMC is not proposing to establish a new home health agency pursuant to a need determination in the SMFP..." Therefore, the Health @ Home Application should not be included in the CON Review process and should not be considered in the process of granting any CON.

VII *STAFFING*

2. *(a)* *All applicants complete Table VII.2 for each of the first two years of operation after completion of the project.*

Vizion One obtained the various components of the FTE-computations submitted by the applicants and calculated the FTE's based upon that information for for each applicant. The computed FTE's were then compared to the FTE's reflected in each application. The computation utilized 260 work days per year to compare all FTE's as the FTE's are required to be computed based upon 2,080 hours each. (5 day week * 52 weeks = 260 days) and (260 days * 8 hrs day = 2,080 hrs).The computations also utilized the visits per day to determine the number of visits required to equate to one FTE and the hours per visit.

The Visits by Discipline per each application were then divided by the total number of visits required per Discipline for one FTE to compute the FTE. A comparison was then made of the FTE's per Application to the calculated FTE's. The results for each year are as follows:

Visits per Week:

Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	25.0	20.0	25.0	25.0	27.5	25.0	22.50	22.35	20	25.0
LPN		27.5	29.5	25.0	0.0	25.0	29.00		15	
RN PRN		22.5								
PT	25.0	20.0	27.0	25.0	27.5	25.0	27.00	25.00	15	25.0
LPTA		27.5		25.0		25.0	27.00			
ST	25.0	20.0	26.5	25.0	27.5	25.0	22.00	1.65	10	25.0
OT	25.0	25.0	26.5	25.0	27.5	25.0	25.75	25.00	15	25.0
COTA		27.5					25.75			
MSW	17.5	20.0	15.0	17.5	20.0	25.0	16.50	17.00	5	15.0
HHA	27.0	27.5	26.0	30.0	32.5	25.0	27.00	25.00	15	25.0

*Source: Calculated Visits per Day * 5 Days Week*

Vist per Day:

Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	5		5.0	5.0	5.5	5	4.5	4.47	4	5
LPN			5.9	5		5	5.8		3	
RN PRN		4.0								
PT	5	5.5	5.4	5	5.5	5	5.4	5	3	5
LPTA		4.5		5		5	5.4			
ST	5	4.0	5.3	5	5.5	5	4.4	0.33	2	5
OT	5	5.5	5.3	5	5.5	5	5.15	5	3	5
COTA		4.0					5.15			
MSW	3.5	5.0	3.0	3.5	4	5	3.3	3.4	1	3
HHA	5.4	5.5	5.2	6	6.5	5	5.4	5	3	5

Source: CON Applications

Hours per Visit:

Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	1.6		1.6	1.6	1.5	1.6	1.8	1.8	2.0	1.6
LPN			1.4	1.6		1.6	1.4		2.7	
RN PRN		2.0								
PT	1.6	1.5	1.5	1.6	1.5	1.6	1.5	1.6	2.7	1.6
LPTA		1.8		1.6		1.6	1.5			
ST	1.6	2.0	1.5	1.6	1.5	1.6	1.8	24.2	4.0	1.6
OT	1.6	1.5	1.5	1.6	1.5	1.6	1.6	1.6	2.7	1.6
COTA		2.0								
MSW	2.3	1.6	2.7	2.3	2.0	1.6	2.4	2.4	8.0	2.7
HHA	1.56	1.5	1.5	1.3	1.2	1.6	1.5	1.6	2.7	1.6

Source: Calculated 8hrs a Day / 5Days a Week

Visit per Year:

Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	1,300		1,300	1,300	1,430	1,300	1,170	1,162.2	1,040	1,300
LPN			1,534	1,300		1,300	1,508		780	
RN PRN		1,040								
PT	1,300	1,430	1,404	1,300	1,430	1,300	1,404	1,300	780	1,300
LPTA		1,170		1,300		1,300	1,404			
ST	1,300	1,040	1,378	1,300	1,430	1,300	1,144	85.8	520	1,300
OT	1,300	1,430	1,378	1,300	1,430	1,300	1,339	1,300	780	1,300
COTA		1,040					1,339			
MSW	910	1,300	780	910	1,040	1,300	858	884	260	780
HHA	1,404	1,430	1,352	1,560	1,690	1,300	1,404	1,300	780	1,300

*Source: Calculated Visits per Day * 260 Days Year*

Visits per Application:

Year 1 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	3,392	23,171	3,177	2,853	4,251	3,106	595	1,772	26	2,408
PT	2,680	15,340	1,973	1,920	1,801	3,132	463	1,235	338	1,924
ST	182	632	108	114	144	432	31	35	78	113
OT	619	3,061	389	460	432	170	103	371	208	441
MSW	39	770	24	28	72	332	7	15	13	34
HHA	451	2,845	444	330	504	398	77	302	286	361
Total	**7,363**	**45,819**	**6,115**	**5,705**	**7,204**	**7,570**	**1,276**	**3,730**	**949**	**5,281**

Source: CON Applications

Year 2 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	4,376	24,162	4,457	3,080	6,648	5,138	3,972	5,449	182	3,707
PT	3,458	15,997	2,768	2,073	2,817	5,217	3,084	3,813	624	2,958
ST	235	659	151	123	225	279	228	122	78	173
OT	798	3,192	546	496	676	718	708	1,150	312	680
MSW	51	803	34	30	113	556	48	47	39	58
HHA	582	2,967	622	356	789	662	516	946	364	549
Total	**9,500**	**47,780**	**8,578**	**6,158**	**11,268**	**12,570**	**8,556**	**11,527**	**1,599**	**8,125**

Source: CON Applications

FTE'S for Comparison:

Year 1 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	2.61	22.28	2.44	2.19	2.97	2.39	0.51	1.52	0.03	1.85
PT	2.06	10.73	1.41	1.48	1.26	2.41	0.33	0.95	0.43	1.48
ST	0.14	0.54	0.08	0.09	0.10	0.33	0.03	0.41	0.15	0.09
OT	0.48	2.94	0.28	0.35	0.30	0.13	0.08	0.29	0.27	0.34
MSW	0.04	0.54	0.03	0.03	0.07	0.26	0.01	0.02	0.05	0.04
HHA	0.32	2.74	0.33	0.21	0.30	0.31	0.05	0.23	0.37	0.28
Total	**5.65**	**39.76**	**4.57**	**4.36**	**5.00**	**5.82**	**1.01**	**3.42**	**1.29**	**4.08**

Source: Calculated Discipline Visits / Visits per Year

Year 2 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	3.4	23.2	3.43	2.37	4.65	3.95	3.39	4.69	0.18	2.85
PT	2.7	11.2	1.97	1.59	1.97	4.01	2.20	2.93	0.80	2.28
ST	0.2	0.6	0.11	0.09	0.16	0.21	0.20	1.42	0.15	0.13
OT	0.6	3.1	0.40	0.38	0.47	0.55	0.53	0.88	0.40	0.52
MSW	0.1	0.6	0.04	0.03	0.11	0.43	0.06	0.05	0.15	0.07
HHA	0.4	2.9	0.46	0.23	0.47	0.51	0.37	0.73	0.47	0.42
Total	7.3	41.5	6.41	4.70	7.82	9.67	6.74	10.71	2.14	6.28

Source: Calculated Discipline Visits / Visits per Year

FTE's per Application:

Year 1 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	3.00	19.80	2.5	2.20	3.50	3.20	0.75	1.64	3.66	1.85
PT	2.25	11.00	1.5	1.48	1.30	3.20	0.41		4.66	1.48
ST	0.15	1.00	0.1	0.09	0.10	0.20	0.10		1.33	0.09
OT	0.50	2.50	0.3	0.35	0.03	0.45	0.05		3.33	0.34
MSW	0.10	1.00	0.03	0.03	0.10	0.35	0.02	0.17	0.16	0.04
HHA	0.40	2.50	0.5	0.21	0.04	0.40	0.07	0.25	4.66	0.28
Total	**6.40**	**37.80**	**4.93**	**4.36**	**5.07**	**7.80**	**1.40**	**2.06**	**17.8**	**4.08**

Source: CON Applications

Year 2 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	3.75	21.30	3.3	2.37	5.20	4.35	3.75	5.00	(A)	2.85
PT	2.75	14.70	2	1.60	2.00	4.40	2.58		(A)	2.28
ST	0.20	1.00	0.1	0.09	0.18	0.25	0.66		(A)	0.13
OT	0.75	2.50	0.4	0.38	0.50	0.60	0.25		(A)	0.52
MSW	0.10	1.00	0.04	0.03	0.02	0.45	0.25	0.3	(A)	0.07
HHA	0.50	2.50	0.5	0.23	0.06	0.55	0.48	0.8	(A)	0.42
Total	**8.05**	**43.00**	**6.34**	**4.70**	**7.96**	**10.60**	**7.97**	**6.10**	**(A)**	**6.27**

Source: CON Applications

FTE Variances:

Year 1 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	0.39	-2.48	0.06	0.01	0.53	0.81	0.24	0.12	3.64	0.00
PT	0.19	0.27	0.09	0.00	0.04	0.79	0.08	-0.95	4.23	0.00
ST	0.01	0.46	0.02	0.00	0.00	-0.13	0.07	-0.41	1.18	0.00
OT	0.02	-0.44	0.02	0.00	-0.27	0.32	-0.03	-0.29	3.06	0.00
MSW	0.06	0.46	0.00	0.00	0.03	0.09	0.01	0.15	0.11	0.00
HHA	0.08	-0.24	0.17	0.00	-0.26	0.09	0.02	0.02	4.29	0.00
Total	**0.75**	**-1.96**	**0.36**	**0.00**	**0.07**	**1.98**	**0.39**	**-1.36**	**16.51**	**0.00**

Source: Calculated FTE's for Comparison – FTE per CON Application

Year 2 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	0.38	-1.93	-0.13	0.00	0.55	0.40	0.36	0.31	(A)	0.00
PT	0.09	3.51	0.03	0.01	0.03	0.39	0.38	-2.93	(A)	0.00
ST	0.02	0.44	-0.01	0.00	0.02	0.04	0.46	-1.42	(A)	0.00
OT	0.14	-0.57	0.00	0.00	0.03	0.05	-0.28	-0.88	(A)	0.00
MSW	0.04	0.44	0.00	0.00	-0.09	0.02	0.19	0.25	(A)	0.00
HHA	0.09	-0.35	0.04	0.00	-0.41	0.04	0.11	0.07	(A)	0.00
Total	**0.76**	**1.53**	**-0.07**	**0.00**	**0.14**	**0.93**	**1.23**	**-4.61**	**(A)**	**-0.01**

Source: Calculated Source: Calculated FTE's for Comparison – FTE per CON Application

(A) No Year 2 FTE information in Application

Application Pages 43 and 44 specify that "CHMC is not proposing to establish a new home health agency pursuant to a need determination in the SMFP…" Therefore, the Health @ Home Application should not be included in the CON Review process and should not be considered in the process of granting any CON.

Variances Calculated FTE Wages vs Application Wages:

Year 1	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	(27,744)	97,517	(52,293)	4,188	(36,329)	(1,127,468)	(15,609)	(8,139)	(1,222,416)	0.00
PT	(15,143)	(174,946)	40,527	8,853	(3,285)	(1,308,168)	(6,508)	-	23,425	0.00
ST	(780)	(39,268)	-	(19)	(1,462)	(97,165)	(1,533)	-	8,735	0.00
OT	(1,761)	45,464	-	25	157	(213,748)	(1,483)	-	15,982	0.00
MSW	(2,754)	(9,610)	-	15	(1,385)	(155,807)	(861)	848	364	0.00
HHA	5,501	5,692	(5,148)	1	(3,180)	(70,891)	(364)	(557)	(335,413)	0.00
Total	**(42,682)**	**(75,150)**	**(87,682)**	**13,063**	**(45,484)**	**(2,973,248)**	**(26,358)**	**(7,847)**	**(1,509,324)**	**(1)**
%	**(0.09)**	**(0.03)**	**(0.38)**	**0.04**	**(0.12)**	**(0.89)**	**(0.27)**	**(0.6)**	**(A) (0.90)**	**0.0**

Source: Calculated Source: Calculated FTE's for Comparison Wages –Form B Wages per CON Application

(B) Incomplete Form B located in Application ST, MSW and Administrative Cost missing.

Year 1	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	(27,934)	131,045	52,619	4,667	(39,106)	(1,139,061)	(1,106)	(25,527)	(1,239,883)	2
PT	(7,412)	(185,030)	99,774	9,867	(2,509)	(1,276,598)	(16,138)	-	(74,900)	(1)
ST	(1,538)	(37,856)	-	(25)	(1,364)	(116,208)	(3,780)	-	-	(0)
OT	(10,308)	55,240	-	(1,713)	(2,107)	(204,103)	(10,398)	-	(33,964)	(2)
MSW	(46,627)	(9,266)	-	1,711	(4,234)	(157,511)	(10,726)	2,712	-	4
HHA	(2,847)	10,714	(1,231)	(5)	(4,286)	(72,525)	(2,493)	(1,781)	(374,664)	2
Total	**(96,665)**	**(35,154)**	**151,162**	**14,502**	**(53,605)**	**(2,966,005)**	**(44,640)**	**(24,596)**	**(1,723,411)**	**5**
%	**(0.15)**	**(0.01)**	**0.49**	**0.04**	**(0.09)**	**(0.79)**	**(0.09)**	**(0.06)**	**(A) (1.00)**	**0.00**

Source: Calculated Source: Calculated FTE's for Comparison Wages –Form B Wages per CON Application

(B) Incomplete Form B located in Application ST, MSW and Administrative Cost missing. No comparsion computations could be made as no Year 2 FTE information was contained in the application.

The negative amounts reflect analysis computations are less than wage amounts projected in the Form B Financial Statement. The negative amount indicated the applicant has overstated the expense for Discipline Wages. Again, Vizion One believes that in addition to over projection of FTE's and the resulting dollar amounts, all applicants are using wage estimates greater than the amounts applicable specifically to Mecklenburg County, NC as specified by the US Bureau of Labor 2011 Statistics Occupational Employment and Wages Estimates for Charlotte-Gastonia-Rock Hill, NC-SC. Vizion One utilizes the data as it was specific for the identified need area not a national average.

Application Pages 43 and 44 specify that "CHMC is not proposing to establish a new home health agency pursuant to a need determination in the SMFP..." Therefore, the Health @ Home Application should not be included in the CON Review process and should not be considered in the process of granting any CON.

Position Average Salary for a full Time Employee:

Year 1 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	70,999	63,637	68,770	69,000	68,900	59760	64,645	71,000	58,233	62,504
LPN		36,293	47,000	44,100		39250	42,711		92,207	
RN PRN		64,047								
PT	80,353	83,197	100,000	81,500	81,000	67213	82,494		203,826	77,376
LPTA		74,508		56,000		47,750	51,385			
ST	78,014	85,396		75,500	75,000	83,495	73,089		58,233	69,014
OT	73,856	71,129		76,700	75,000	65,984	77,120		145,593	78,749
COTA		57,194					59,108			
MSW	48,190	20,821		50,377	45,000	65,617	54,190	50,000	7,276	44,741
HHA	32,500	29,419	30,000	29,000	31,250	26,270	21,110	32,250	97,060	20,155

Source: CON Applications

Year 2 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	72,774	64,591	70,627	71,070	70,967	73,987	65,938	72,420		64,067
LPN		36,838	48,269	45,423		40,035	43,627			
RN PRN		65,088								
PT	82,362	84,445	102,700	83,945	83,430	94,585	84,144			79,310
LPTA		75,626		57,680		48,705	52,413			
ST	79,964	86,677		77,765	77,250	112,828	74,551			70,740
OT	75,702	72,196		79,001	77,250	83,785	78,663			80,718
COTA		58,052					60,290			
MSW	49,395	21,134		51,888	46,350	86,872	55,274	51,000		45,917
HHA	33,313	30,363	30,810	29,870	32,188	32,493	21,532	32,895		20,659

Source: CON Applications

Year 2 Discipline	BLS Mean
RN	62,504
LPN	41,640
RN PRN	62,504

PT	77,376
LPTA	51,960
ST	69,014
OT	78,749
COTA	55,640
MSW	44,741
HHA	20,155

Source: BLS May 2011 Metropolitan and Non-metropolitan Area Occupational Employment and Wage Estimates, Charlotte-Gastonia-Rock Hill NC-SC

Wage Variances:

Year 2 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	1.14	1.02	1.10	1.10	1.10	0.96	1.03	1.14	0.93	1.00
LPN		0.87	1.13	1.06		0.94	1.03		2.21	1.00
RN PRN		1.02								1.00
PT	1.04	1.08	1.29	1.05	1.05	0.87	1.07		2.63	1.00
LPTA		1.43		1.08		0.92	0.99			1.00
ST	1.13	1.24		1.09	1.09	1.21	1.06		0.84	1.00
OT	0.94	0.90		0.97	0.95	0.84	0.98		1.85	1.00
COTA		1.03					1.06			1.00
MSW	1.08	0.47		1.13	1.01	1.47	1.21	1.12	0.16	1.00
HHA	1.61	1.46	1.49	1.44	1.55	1.30	1.05	1.60	4.82	1.00

Source: Calculated Position Average Salary for a full Time Employee /2011 BLS Wage Estimate

Vizion One questions the accuracy of the "Position Average Salary for a full Time Employee" used by Health @ Hme. As reflected above The Mean Salaries for employees in these positions is substantially lower than those projected by Health @ Home per the 2011 BLS Employment and Wage Estimates for the Mecklenburg County area. Vizion One believes the Projected Average Salaries are inflated and do not accurately reflect the wages in Mecklenburg County area.

As explained above the Health @ Home application, FTE projections overstate its FTE's and therefore overstates expenses on that basis alone. Vizion One believes they further overstates expenses by utilizing the NAHC Wage data as it reflects a national average not an area specific amount. Vizion One on the other hand has consistently utilized data specific to Mecklenburg County throughout its application.

Application Pages 43 and 44 specify that "CHMC is not proposing to establish a new home health agency pursuant to a need determination in the SMFP…" Therefore, the Health @ Home Application should not be included in the CON Review process and should not be considered in the process of granting any CON.

VIII. CAPITAL COSTS AND FINANCING

1. Estimated Capital Costs of Proposed Project

N.C.G.S. 131E-176 (2a) defines a capital expenditure as an expenditure which under generally accepted accounting principles is not properly chargeable as an expense of operation and maintenance. In A, B and C below, provide the projected capital costs as follows:

(a) For a proposed new home health agency office, the applicant must use the most accurate estimates available for the development of the entire project.

(b) For an expansion or renovation of an existing home care agency, the applicant must use the most accurate estimates available for the development of the proposed addition or the renovation.

Capital Cost	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Construction Cost		245,500								
Equip/Computers	15,000	15,000	9,900	27,710	40,000	51,260	38,480	101,260	3,000	10,383
Furniture	10,000	49,500	10,000	4,164	20,000	23,953	11,440	22,100	3,000	4,910
Architect/Engineering		25,000								
Legal Fees						10,000				
Mkt Analysis						2,000				
CON Prep	40,000	65,000	42,500	-	35,000	19,500	750	55,000		40,000
Other		20,000				5,000	41,600			59,806
Contiengcy		30,000			15,000			17,836		
Total	**65,000**	**450,000**	**62,400**	**31,874**	**110,000**	**111,713**	**92,270**	**196,196**	**6,000**	**115,099**

Source: CON Applications

Application Pages 43 and 44 specify that "CHMC is not proposing to establish a new home health agency pursuant to a need determination in the SMFP…" Therefore, the Health @ Home Application should not be included in the CON Review process and should not be considered in the process of granting any CON.

IX. START-UP AND INITIAL OPERATING EXPENSES/FINANCING

1. Estimated Start-up Expenses
2. Estimated Initial Operating Expenses
3. Total Working Capital

Start-up & Operating Expenses	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Startup	40,000		122,137	65,966	70,000	102,283	42,826	171,554	20,000	99,807

Initial Operating Exp	225,000		31,,455	341,220	480,000	646,38	247,565	539,614	30,000	361,496
Initial Operating Period	6	0	9	6	6	3	12	19	1	7
Total Working Capital	265,000	0	153,592	407,186	550,000	1669,21	290,391	711,168	50,000	461,303

Source CON Applications

Application Pages 43 and 44 specify that "CHMC is not proposing to establish a new home health agency pursuant to a need determination in the SMFP..." Therefore, the Health @ Home Application should not be included in the CON Review process and should not be considered in the process of granting any CON.

X. COST INFORMATION

1. All applicants must complete Table X.1 to show the following:
*Your existing licensed home care agency's **cost** per unit of care (visit or hour) during the current year of operation, by discipline, and the total **cost** per visit, by discipline, for the two years following completion of the proposed home health agency.*

Yr. 1 Cost per Visit	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	82.84	154.24	86.71	137.22	144.71	91.9	605.48	292.17	122,3873	132.01
PT	88.26	137.57	91.60	146.78	146.81	82.4	224.52	214.39	36,795	160.51
ST	84.56	179.81	75.00	146.84	151.89	123.12	332.90	214.39	8,491	144.49
OT	79.23	131.12	75.00	155.11	139.06	88.98	225.15	214.39	62,643	163.15
MSW	151.57	86.72	75.00	170.27	151.76	89.92	530.46	837.71	1,334	155.12
HHA	43.45	50.38	71.87	86.9	105.76	47.85	146.91	172.19	49,002	50.85

Source CON Applications

Yr. 2 Cost per Visit	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	82.35	158.38	88.96	137.95	135.77	93.38	165.26	169.2	1239883	115.02
PT	85.98	139.15	88.81	147.8	140.27	84.03	147.73	134.33	67929	139.86
ST	89.08	179.78	75.00	147.86	141.34	125.56	148.62	134.33	8491	125.9
OT	92.49	131.24	75.00	156.38	137.72	90.73	140.28	134.33	33964	142.16
MSW	122.65	87.15	75.00	171.99	168.05	91.7	499.63	408.8	4246	135.17
HHA	43.21	86.80	60.68	86.12	97.5	48.78	58.84	91.39	52664	44.27

Source CON Applications

Historical Cost per Visit:

2010 Cost per Visit	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN		166.26	98.11			129.35				
PT		148.27	152.5			110.9				
ST		204.44	107.84			177.81				
OT		168.10	182.25			122.97				
MSW		2000.33	362.36			117.84				
HHA		68.84	59.69			48.26				

Source: 2010 CMS HCRIS HHA Cost Reports, Updated 1/23/12

Historical Cost per Visit Variance:

	Year 1				Year 2		
2010 Cost per Visit	Health @ Home	HKZ	Emerald Care		Health @ Home	HKZ	Emerald Care
RN	-12.02	-11.40	-37.45		-7.88	-9.15	-35.97
PT	-10.7	-60.90	-28.5		-9.12	-63.69	-26.87
ST	-24.63	-32.84	-54.69		-24.66	-32.84	-52.25
OT	-36.98	-107.25	-33.99		-36.86	-107.25	-32.24
MSW	-1913.61	-287.36	-27.92		-1913.18	-287.36	-26.14
HHA	-18.46	12.18	-0.41		17.96	0.99	0.52

Source: Calculated Projected Cost per Visit – Historical Cost per Visit

Three Applicants have a history of services in Mecklenburg County. All three project Cost per Visits lower than their historical Cost per Visit for established Agencies which currently provide services in Mecklenburg County. Healthy @ Home served 327.8% more patients than its project year two projection. HKZ served 311.4% more patients in year two than it projects and Emerald Care served 401.5% more than it projects. Additionally, the CMS data reflects Healthy @ Home average visits per patient at 7.72 in 2010 while it projects 15.96 for this project. CMS data reflects average visit per patient for HKZ at 17.35 in 2010 while it projects 21.72 this project. Emerald Cares CMS data reflects 28.01 in 2010 while it projects 26.41 for this project. These three applicants are inconsistent with their historical data when making the projections for this project.

The J & D Health Care reflects what appears to be Total Cost by discipline and does not reflect the information required for this section.

Application Pages 43 and 44 specify that "CHMC is not proposing to establish a new home health agency pursuant to a need determination in the SMFP..." Therefore, the Health @ Home Application should not be included in the CON Review process and should not be considered in the process of granting any CON.

2. *CHARGE INFORMATION*

Complete Table X.2

Charges per Visit	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	125	125	130	169	135	125	150	165	1223873	160
PT	130	125	145	180	135	141	150	175	36795	165
ST	130	125	145	169	145	142	150	175	8491	165
OT	130	125	145	169	145	142	150	175	62643	165
MSW	175	165	190	327	350	186	150	195	1334	180
HHA	70	60	65	82	70	65	95	65	49002	90

Source: CON Applications

The J & D Health Care reflects what appears to be Gross Revenues by discipline and does not reflect the information required for this section.

Application Pages 43 and 44 specify that "CHMC is not proposing to establish a new home health agency pursuant to a need determination in the SMFP…" Therefore, the Health @ Home Application should not be included in the CON Review process and should not be considered in the process of granting any CON.

VIZION ONE HOME HEALTH
COMPETING APPLICATION COMMENTS
MECKLENBURG COUNTY, NC CON APPLICATIONS
HKZ Group LLC
F-10005-12

10A NCAC 14C .2003 PERFORMANCE STANDARDS

An applicant shall project, in the third year of operation, an annual unduplicated patient caseload for the county in which the facility will be located that meets or exceeds the minimum need used in the applicable State Medical Facilities Plan to justify the establishment of a new home health agency office in that county. An applicant shall not be required to meet this performance standard if the home health agency office need determination in the applicable State Medical Facilities Plan was not based on application of the standard methodology for a Medicare-certified home health agency office.

Unduplicated Patients and Growth:

Patients	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Year 1	426	2,870	282	326	378	330	74	204	50	211
Year 2	503	2,993	395	351	591	476	492	548	92	325
Year 3	516	0	416	0	821	0	0	548	0	348
Growth										
Year 2 to 2	118%	104%	140%	108%	156%	144%	665%	269%	184%	154%
Year 2 to 3	103%	Not Proj.	105%	Not Proj.	139%	Not Proj.	Not Proj.	0%	Not Proj.	107%

Source: CON Applications

Unduplicated Census found on Page 57 of the HKZ Application. Noted HKZ actually projects a Total Unmet Need of 376 Patients. However, it proposes to serve only 275 of the patients in Fiscal Year One. It is further noted that HKZ is not projecting its need based upon the identified need contained in the SMFP.

HKZ is projecting 86.7 percent of its Unduplicated Patients form Mecklenburg County in year one. The applicant projects 87.3percent in year two and 88.0 percent in year three. These assumptions result in actual Mecklenburg Patients of 283 in year one, 301 in year two and 322 in year three. The inclusion of Union County Patients, a county not identified as having need by the SMFP, in its Mecklenburg County application skews the data and prevents an accurate comparison of applications utilizing only the Mecklenburg need. The HKZ application should be rejected as best choice for awarding a CON for Mecklenburg County, as it utilizes projections including need from Union County which has not been identified as having sufficient unmet need by the SMFP and prevents like comparisons of competing applications.

IV. *UTILIZATION*

5. *Provide the projected number of unduplicated patients for the initial two years after completion of the proposed project. Patients should be counted only under the admitting service discipline. In Table IV.1, include only the unduplicated patients projected to be served by the proposed new home health agency office. If the applicant is proposing to develop a branch office or a subunit of an existing home health agency (i.e., the proposed office will use an existing provider number) and the applicant wishes to provide utilization data for the entire home health agency, please provide it in an appendix. The utilization data in Table IV.1 should include only the patients projected to be served by the new office*

Unduplicated Patient Distribution Projections:

Patients	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	66.67%	70.98%	65.00%	(A)	65.00%	71.21%	67.00%	89.00%	4.00%	54.14%
PT	33.33%	28.75%	35.00%	(A)	35.00%	28.24%	33.00%	11.00%	52.00%	43.34%
ST	0.00%	0.28%	0.00%	(A)	0.00%	0.31%	0.00%	0.00%	12.00%	2.52%
Total	**100.00%**	**100.01%**	**100.00%**	**(A)**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**68.00%**	**100.00%**
									(B)	
OT									32.00%	
Total	**100.00%**	**100.01%**	**100.00%**	**(A)**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**

Sourc: CON Applications

(E) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix.
(F) Applicant allocated Unduplicated Patients to OT which is not an admitting discipline.

Unduplicated Patient Distribution is found on Page 58 of the HKZ Application. HKZ states on Page 57 of the application that the "While patients can qualify in one of four home health services, (skilled nursing, physical therapy, occupational therapy and speech therapy),..", it projects the distribution relying on the experience of the three home health agencies owned by Healthkeeperz. While the Distribution is correct as presented the statement is incorrect. Occupational Therapy (OT) may be re-certified for "OT Only" services at the end of a service period if it meets specific criteria. Per the Regulations, patients requiring the OT skill only cannot admitted, they must initially require nursing, physical therapy or speech therapy. The Regulations then go on to specify that patients may be re-certified for OT at the end of a service period and the criteria for such.

The Distribution to admitting disciplines appears to be reasonable, however, the HKZ application should be rejected as best choice for awarding a CON for Mecklenburg County, as it utilizes projections including need from Union County which has not been identified as having sufficient unmet need by the SMFP and prevents like comparisons of competing applications.

6. *Provide projected monthly utilization data, including the projected number of duplicated home health patients and visits for the initial two years after completion of the proposed project. In Table IV.2, include only the duplicated patients projected to be served by the proposed home health agency office. In Table IV.2, include only the duplicated patients projected to be served by the proposed home health agency office. If the applicant is proposing to develop a branch office or a subunit of an existing home health agency (i.e., the proposed office will use an existing provider number) and the applicant wishes to provide utilization data for the entire home health agency, please provide it in an appendix. The utilization data in Table IV.2 should include only the patients projected to be served by the proposed new office.*

Vizion One obtained the Duplicated Patients submitted by the applicants and calculated the Average visit per Discipline for each applicant. The Average Visits per Discipline were then compared to the Mecklenburg County statistics for existing agencies located in the county, agencies located outside the county and serving Mecklenburg County and then combined. The results for each year are as follows:

Duplicated Patients:

Year 1	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	522	5,660	297	(A)	287	275	79	253	2	361
PT	522	4,827	211	(A)	257	198	66	253	26	306
ST	33	282	15	(A)	23	21	3	12	6	19
OT	522	1,164	65	**(A)**	79	54	37	253	16	110
MSW	12	98	21	**(A)**	45	95	10	12	1	23
HHA	522	221	33	**(A)**	102	38	13	253	22	34
Total	**2,133**	**12,252**	**642**	**(A)**	**793**	**681**	**208**	**1,036**	**73**	**853**

Source: CON Applications

(C) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Year 1 Average Visit per Discipline:

Year 1	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	6.50	4.09	10.70	(A)	14.81	11.29	7.53	7.00	13.00	6.68
PT	5.13	3.18	9.35	(A)	7.01	15.82	7.02	4.88	13.00	6.28
ST	5.52	2.24	7.20	(A)	6.26	20.57	10.33	2.92	13.00	5.87
OT	1.19	2.63	5.98	**(A)**	5.47	3.15	2.78	1.47	13.00	4.01
MSW	3.25	7.86	1.14	**(A)**	1.60	3.49	0.70	1.25	13.00	1.48
HHA	0.86	12.87	13.45	**(A)**	4.94	10.47	5.92	1.19	13.00	10.58
Total	**22.45**	**32.87**	**47.83**	**0.00**	**40.09**	**64.80**	**34.29**	**18.71**	**78.00**	**34.90**

Source: Calculated Discipline Visits / Duplicated Patients

(C) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

NC Statistics:

	In County	Outside County	Combined In County & Outside County
SN	6.68	10.56	9.53
PT	6.28	8.31	7.56
ST	5.87	8.05	4.88
OT	4.01	5.32	7.85
MSW	1.48	2.02	1.90
HHA	10.58	12.71	12.40

Source:: NC Division of Health Services, Medical Facilities Planning Section, Home Health Database, Updated 7/26/2011, tblStaff.

Variances:

Year 1 In County	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	-0.18	-2.58	4.02	**(A)**	8.13	4.62	0.85	0.33	6.32	0.00
PT	-1.15	-3.11	3.07	**(A)**	0.72	9.53	0.73	-1.40	6.72	0.00
ST	-0.35	-3.63	1.33	**(A)**	0.39	14.70	4.46	-2.95	7.13	0.00
OT	-2.82	-1.38	1.98	**(A)**	1.46	-0.86	-1.22	-2.54	8.99	0.00
MSW	1.77	6.38	-0.34	**(A)**	0.12	2.01	-0.78	-0.23	11.52	0.00
HHA	-9.72	2.29	2.87	**(A)**	-5.64	-0.11	-4.66	-9.39	2.42	0.00
Total	**-12.46**	**-2.03**	**12.93**	**(A)**	**5.19**	**29.90**	**-0.62**	**-16.19**	**43.10**	**0.00**

Source: Calculated Average Visit per Disciplines –NC Statistics In County

(C) Unduplicated Patient, Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Year 1 Out of County	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	-4.06	-6.47	0.14	(A)	4.25	0.73	-3.03	-3.56	2.44	-3.88
PT	-3.18	-5.13	1.04	(A)	-1.30	7.51	-1.29	-3.43	4.69	-2.03
ST	-2.53	-5.81	-0.85	(A)	-1.79	12.52	2.28	-5.13	4.95	-2.18
OT	-4.13	-2.69	0.66	**(A)**	0.15	-2.17	-2.54	-3.85	7.68	-1.31
MSW	1.23	5.84	-0.88	**(A)**	-0.42	1.47	-1.32	-0.77	10.98	-0.54
HHA	-11.85	0.16	0.74	**(A)**	-7.77	-2.24	-6.79	-11.52	0.29	-2.13
Total	**-24.52**	**-14.10**	**0.86**	**(A)**	**-6.88**	**17.83**	**-12.68**	**-28.26**	**31.03**	**-12.07**

Source: Calculated Average Visit per Disciplines –NC Statistics Out of County

(C) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Year 1 Combined	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	-3.03	-5.44	1.17	(A)	5.28	1.76	-2.00	-2.53	3.47	-2.85
PT	-2.43	-4.38	1.79	(A)	-0.55	8.26	-0.54	-2.68	5.44	-1.28
ST	0.64	-2.64	2.32	(A)	1.38	15.69	5.45	-1.96	8.12	0.99
OT	-6.66	-5.22	-1.87	**(A)**	-2.38	-4.70	-5.07	-6.38	5.15	-3.84
MSW	1.35	5.96	-0.76	**(A)**	-0.30	1.59	-1.20	-0.65	11.10	-0.42
HHA	-11.54	0.47	1.05	**(A)**	-7.46	-1.93	-6.48	-11.21	0.60	-1.82
Total	**-21.67**	**-11.25**	**3.71**	**(A)**	**-4.03**	**20.68**	**-9.83**	**-25.41**	**33.88**	**-9.22**

Source: Calculated Average Visit per Disciplines –NC Statistics combined

(C) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

For Year 1, HKZ Duplicated Patients data was found on Application Page 59. The HKZ Average Visits per Discipline are closer to the "Outside the County" statistics reflected in the table above. The Summary Table below reflects the variances specific to Agencies located in Mecklenburg County, Outside Mecklenburg County but serving patients in Mecklenburg County and the Combined in County and Outside County statistic.

Year 2	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	670	5,902	417	(A)	449	397	468	719	14	555
PT	670	5,033	296	(A)	402	286	372	719	72	471
ST	42	294	21	(A)	35	30	24	21	6	19
OT	670	1,214	91	**(A)**	124	78	216	719	24	170
MSW	16	102	29	**(A)**	71	137	66	12	3	39
HHA	670	230	47	**(A)**	160	54	60	719	26	52
Total	**2,738**	**12,775**	**901**	**(A)**	**1,241**	**982**	**1,206**	**2,909**	**145**	**1,306**

Source: CON Applications

(C) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Year 2 Average Visit per Discipline:

Year 2	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	6.53	4.09	10.69	(A)	14.81	12.94	8.49	7.58	13.00	6.68
PT	5.16	3.18	9.35	(A)	7.01	18.24	8.29	5.30	8.67	6.28
ST	5.60	2.24	7.19	(A)	6.43	9.30	9.50	5.81	13.00	8.99
OT	1.19	2.63	6.00	**(A)**	5.45	9.21	3.28	1.60	13.00	4.01
MSW	3.19	7.87	1.17	**(A)**	1.59	4.06	0.73	3.92	13.00	1.48
HHA	0.87	12.90	13.23	**(A)**	4.93	12.26	8.60	1.32	14.00	10.58
Total	**22.53**	**32.92**	**47.64**	**(A)**	**40.22**	**66.01**	**38.88**	**25.52**	**74.67**	**38.02**

Source: Calculated Discipline Visits / Duplicated Patients

(C) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Year 2 In County	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	-1.12	-3.11	3.07	(A)	0.72	11.96	2.01	-0.98	2.38	0.00
PT	-3.39	-6.75	-1.80	(A)	-2.56	0.31	0.51	-3.18	4.01	0.00
ST	-2.82	-1.38	1.99	(A)	1.44	5.20	-0.73	-2.41	8.99	0.00
OT	1.71	6.39	-0.31	**(A)**	0.11	2.58	-0.75	2.43	11.52	0.00
MSW	-9.72	2.32	2.65	**(A)**	-5.65	1.68	-1.98	-9.27	3.42	0.00
HHA	-2.75	-2.48	3.30	**(A)**	2.86	6.58	0.87	-2.26	4.81	0.00
Total	**-18.09**	**-5.00**	**8.90**	**(A)**	**-3.08**	**28.30**	**-0.08**	**-15.66**	**35.13**	**0.00**

Source: Calculated Average Visit per Disciplines –NC Statistics In County

(C) Unduplicated Patients, Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Year 2 Out of County	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	-3.15	-5.13	1.04	(A)	-1.30	9.93	-0.02	-3.01	0.36	-2.03
PT	-2.45	-5.81	-0.86	(A)	-1.62	1.25	1.45	-2.24	4.95	0.94
ST	-4.13	-2.69	0.68	(A)	0.13	3.89	-2.04	-3.72	7.68	-1.31
OT	1.17	5.85	-0.85	**(A)**	-0.43	2.04	-1.29	1.90	10.98	-0.54
MSW	-11.84	0.19	0.52	**(A)**	-7.78	-0.45	-4.11	-11.39	1.29	-2.13
HHA	3.47	3.74	9.52	**(A)**	9.08	12.80	7.09	3.96	11.03	6.22
Total	**-16.94**	**-3.85**	**10.06**	**(A)**	**-1.92**	**29.45**	**1.08**	**-14.50**	**36.28**	**1.16**

Source: Calculated Average Visit per Disciplines –NC Statistics Out of County

(C) Unduplicated Patients, Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

Year 2 Combined	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	-2.40	-4.38	1.79	(A)	-0.55	10.68	0.73	-2.26	1.11	-1.28
PT	0.72	-2.64	2.31	(A)	1.55	4.42	4.62	0.93	8.12	4.11
ST	-6.66	-5.22	-1.85	(A)	-2.40	1.36	-4.57	-6.25	5.15	-3.84
OT	1.29	5.97	-0.73	(A)	-0.31	2.16	-1.17	2.02	11.10	-0.42
MSW	-11.53	0.50	0.83	(A)	-7.47	-0.14	-3.80	-11.08	1.60	-1.82
HHA	3.47	3.74	9.52	(A)	9.08	12.80	7.09	3.96	11.03	6.22
Total	**-15.12**	**-2.03**	**11.88**	**(A)**	**-0.10**	**31.27**	**2.90**	**-12.68**	**38.10**	**2.98**

Source: Calculated Average Visit per Disciplines –NC Statistics combined

(C) Unduplicated Patient Table IV.1 not contained in the application and is referred to Exhibit 27 in the Appendix

For Year 2, HKZs Duplicated Patients data was found on Application Page 59. The HKZ Average Visits per Discipline do not resemble any Mecklenburg County statistic.

Summary:

Summary	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Year 1										
In County	**-12.46**	**-2.03**	**12.93**	**(A)**	**5.19**	**29.90**	**-0.62**	**-16.19**	**43.10**	**0.00**
Out of Co.	**-24.52**	**-14.10**	**0.86**	**(A)**	**-6.88**	**17.83**	**-12.68**	**-28.26**	**31.03**	**-12.07**
Combined	**-21.67**	**-11.25**	**3.71**	**(A)**	**-4.03**	**20.68**	**-9.83**	**-25.41**	**33.88**	**-9.22**
Year 2										
In County	**-18.09**	**-5.00**	**8.90**	**(A)**	**-3.08**	**28.30**	**-0.08**	**-15.66**	**35.13**	**0.00**
Out of Co.	**-16.94**	**-3.85**	**10.06**	**(A)**	**-1.92**	**29.45**	**1.08**	**-14.50**	**36.28**	**1.16**
Combined	**-15.12**	**-2.03**	**11.88**	**(A)**	**-0.10**	**31.27**	**2.90**	**-12.68**	**38.10**	**2.98**

HKZ specifies on page 59 of the application it uses an average 2.3 ratio duplicated to unduplicated to project duplicated patients. The HKZ application indicates on page 60, duplicated patients per discipline were projected based upon the patient distribution between disciplines based upon the combined Healthkeeperz, Inc. agencies and Mecklenburg County agencies. While this is acceptable method to project the initial period the subsequent period must be projected utilizing a average visit per patient per discipline to be consistent.

As reflected in the summary table above the HKZ Duplicated Patients Average Visit per Discipline is 0.86 visits more than the Outside Mecklenburg County statistics for year one and is an acceptable variance. Year 2, however, the distribution reflects a substantial variance. The distribution and the average visits per patient doesn't resemble any of the Distributions for Mecklenburg County. The Summary reflects projections of 8.90 more visits in year two than the "In County" statistics. Year two reflects 10.06 more visits than the "Outside of the County" statistics. Year three reflects 11.8 more visits than the "Combined" statistics. Additionally, the 2010 CMS data reflects a variance of 18.96 less than the projection for year two.

The HKZ Duplicated Patients projections are inconsistent between periods. The lack of consistency reflects the HKZ patients receiving substantially more services than it initially projected for year one and does not reflect any similarity to historical services for Mecklenburg County patients.

The HKZ application should be rejected as best choice for awarding a CON for Mecklenburg County, as it utilizes projections including need from Union County which has not been identified as having sufficient unmet need by the SMFP and prevents like comparisons of competing applications. It also should be rejected for utilizing inconsistent projections for patients between years without justification or support and further skews visit projections.

County of Origin:

County	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Mecklenburg	100.00%	84.60%	86.70%	100.00%	85.97%	100.00%	67.60%	90.00%	(A)	100.00%
Other	0.00%	15.40%	13.30%	0.00%	14.03%	0.00%	32.40%	10.00%		0.00%
Total	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**(A)**	**100.00%**

(C) Applicant did not provide any data related to this item.

County of Origin is found on Page 57 of the HKZ Application. Noted HKZ actually projects a Total Unmet Need of 376 Patients. However, it proposes to serve only 275 of the patients in Fiscal Year One. It is further noted that HKZ is not projecting its need based upon the identified need contained in the SMFP.

The table above reflects HKZ is projecting 86.7 percent of its patients from Mecklenburg County. The remaining 13.3 percent is from Union County.

Again, the HKZ application should be rejected as best choice for awarding a CON for Mecklenburg County, as it utilizes projections including need from Union County which has not been identified as having sufficient unmet need by the SMFP and prevents like comparisons of competing applications.

VI. *ACCESSIBILITY*

7. (b) · Provide an estimate of the amount of charity care that will be provided, if any, in each of the first two years of operation of the project?

(c) Does this amount include bad debt? ___No __X___

If so, what amount is bad debt?

Charity Care /Bad Debt:

	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Year 1 in $	10,315	164,740	5,561	9,370	1,052	4,300	1,685	6,965	2,000	12,687
Year 2 in $	24,325	175,222	7,807	10,115	1,781	6,645	1,676	20,390	5,000	18,152
Year 1 % Gross	1.49%	1.21%	0.6%	0.91%	0.09%	0.35%	1.0%	1.0%	1.0%	1.4%
Year 2 % Gross	1.49%	1.21%	0.6%	0.91%	0.10%	0.33%	1.0%	0.95%	2.0%	1.4%
				%						
Total	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.0%**	**100.00%**	**100.00%**	**100.00%**

Source: CON Applications

12. *For the proposed new home health agency office, please provide the following information for* ***the second year of operation*** *following completion of the project. If the applicant is proposing to develop a branch office or a subunit of an existing home health agency (i.e., the proposed office will use an existing provider number), the applicant may provide payor mix projections for the entire home health agency in an appendix. The payor mix projections in the following table should only include the patients projected to be served by the proposed new office. Provide all assumptions utilized in determining these figures. Note that a duplicated patient is counted for* *each* *service discipline rendered.*

Duplicated Patient by Payor Distribution:

Payor Source	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Medicare	67.9%	64.4%	58.3%	58.2%	60.0%	69.6%	58.0%	74.61%	89.0%	53.00%
Medicaid	15.5%	23.4%	20.0%	10.8%	20.0%	15.6%	10.7%	11.30%	0.0%	12.95%
Comm. Ins	15.7%	10.0%	18.8%	25.3%	15.0%	11.3%	27.1%	11.05%	1.0%	32.65%
Self-Pay	0.0%	1.0%	0.0%	4.2%	4.0%	0.0%	0.0%	1.52%	1.0%	0.00%
Charity	0.9%	1.2%	0.0%	1.4%	1.0%	0.5%	1.4%	1.52%	1.0%	1.40%
Other	0.0%	0.0%	2.8%	0.0%	0.0%	0.0%	2.8%	0.00%	8.0%	0.0%
Total	**100.0%**	**100.0%**	**99.9%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.00%**	**100.0%**	**100.00%**

Source: CON Applications

The HKZ application projects its payor distribution on page 68. HKZ states that the duplicated patient payor distribution is based upon a weighted average of the Mecklenburg County average (75 percent and Healthkeeperz 25 percent. It goes on to state, on page 65, that Medicaid is projected slightly higher due the service they provide to Medicaid incontinence patients who receive one visit every 60 days at which time supplies are delivered. HKZ considers 7.5percent, (21.5

unduplicated patients or 48.15 duplicated patients) as slight when compared to 12.5percent the Mecklenburg County percentage . HKZ also reflects 0.0% of duplicated patients as Charity, however, the Charity care reflected in the application reflects 0.6% of gross revenues.

The HKZ application should be rejected as best choice for awarding a CON for Mecklenburg County, as it utilizes projections including need from Union County which has not been identified as having sufficient unmet need by the SMFP and prevents like comparisons of competing applications. It also should be rejected for utilizing inconsistent projections for duplicated patients between years without justification or support which skews the resulting visit projections.

Visit by Payor Distribution:

Payor Source	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Medicare	80.9%	72.0%	66.8%	67.7%	72.40%	77.9%	67.8%	79.36%	89.0%	52.98%
Medicaid	8.7%	16.2%	14.9%	8.2%	14.48%	7.4%	8.2%	9.20%	0.0%	12.92%
Comm. Ins	10.1%	9.20	15.8%	19.2%	9.44%	14.3%	20.9%	8.94%	1.0%	32.71%
Self-Pay		1.2%	0.0%	4.0%	3.57%	0.0%	0.0%	1.45%	1.0%	0.00%
Charity	0.4%	1.4%	0.0%	0.9%	0.11%	0.4%	0.9%	1.04%	1.0%	1.38%
Other		0.0%	2.4%	0.0%	0.00%	0.0%	2.2%	0.00%	8.0%	0.00%
Total	**100.1%**	**100.0%**	**99.9%**	**100.0%**	**100.00%**	**100.0%**	**100.0%**	**99.0%**	**100.0%**	**99.9%**

Source: CON Applications

HKZ states that the "The proposed payor mix iin the pervious table is well within the historical range for exiting Mecklenburg agencies..." It goes on to state that "Healthkeeperz of Mecklenburg projects a slightly higher percent Medicaid than the average reported percentage for Mecklenburg County agencies in 2011." The application also states "The projected Medicaid payor mix is consistent with the historical experience of Healthkeeperz. Inc. The Application does not make any further representations as to other payor mixes.

The historical data for Mecklenburg county as found by Vizion One reflects the Medicare payor percent at 53 percent and Medicaid to be 12.92 percent for agencies operating in Mecklenburg County. As reflected in the table above HKZ projects 66.8 percent. The projection is 13.82 percent higher than the historical data. A look at Healthkeeperz 2010 CMS data for its Medicare Cost Report the Medicare percent is 49.67 which is below but much closer to the Meckenburg historical data. The difference between Healthkeeperz projection is 17.13 percent. The Medicaid projection is 1.98 percent higher than the historical data for Mecklenburg County and 5.1 % lower than the duplicated patient by payor distribution. CMS does not capture the Medicaid Payor percent to compare it.

Based upon the inconsistencies between the HKZ projections, historical data from Mecklenburg County, and historical CMS Medicare data no reliance can be placed upon the HKZ projections.

HKZ appears to be increasing both Medicare and Medicaid payors to increase profitability and project a more accessible application while it fails to project any Charity payor. The inconsistencies between projections and historical data as well as apparent arbitrary increases to Medicare and Medicaid percentages invalidate HKZ payor source projections and thereby in effect make the financial projections unreliable and inaccurate.

The HKZ application should be rejected as best choice for awarding a CON for Mecklenburg County, for the following reasons:

The application utilizes projections including need from Union County which has not been identified as having sufficient unmet need by the SMFP and prevents like comparisons of competing applications.

The application utilizes inconsistent projections for duplicated patients between years without justification or support which skews the resulting visit projections.

The application contains inconsistencies between the HKZ projections, historical data from Mecklenburg County, and Healthkeeperz in historical CMS Medicare data which HKZ states the projections are consistent with resulting in a lack of reliance..

The unreliable and inaccurate financial projections based upon inconsistent and unreliable projections.

Visit by Discipline Distribution:

Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	46.40%	50.57%	51.95%	50.01%	59.00%	38.00%	46.63%	47.51%	2.74%	45.60%
PT	36.10%	33.48%	32.26%	33.65%	25.00%	43.90%	36.29%	33.11%	35.62%	36.43%
ST	2.60%	1.38%	1.77%	2.00%	2.00%	2.20%	2.43%	0.94%	8.22%	2.14%
OT	8.30%	6.68%	6.36%	8.06%	6.00%	5.70%	8.07%	9.95%	21.92%	8.35%
MSW	0.60%	1.68%	0.39%	0.49%	1.00%	4.70%	0.55%	0.40%	1.37%	0.64%
HHA	6.00%	6.21%	7.26%	5.78%	7.00%	5.50%	6.03%	8.10%	30.14%	6.84%
				%						
Total	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.0%**	**100.00%**	**100.00%**	**100.00%**

Source: Calculated (Year One Discipline Visit / Year One Total Visits)

HKZ projects Visits by Discipline on application page 60. Per the application, HKZ utilized the 2012 License Renewal Applications Supplements for Mecklenburg County and Healthkeeperz agencies to determine an average. HKZ projected Averages compared to Visits per Application are as follows:

Yr 1 Discipline	Application HKZ	Computed HKZ	Variance		Yr 1 Discipline	Application HKZ	Computed HKZ	Variance
SN	46.3%	51.95%	-5.65%		SN	46.3%	51.96%	-5.56%
PT	32.8%	32.26%	0.54%		PT	32.8%	32.27%	0.53%
ST	2.3%	1.77%	0.53%		ST	2.3%	1.76%	0.54%
OT	10.2%	6.36%	3.84%		OT	10.2%	6.37%	3.83%
MSW	3.2%	0.39%	2.81%		MSW	3.2%	0.40%	2.80%
HHA	5.2%	7.26%	-2.06%		HHA	5.2%	7.25%	-2.05%
Total	**100.00%**	**100.0%**	**0.01%**		**Total**	**100.00%**	**100.00%**	**0.09%**

Source: HKZ Application, Page 60 and Computed Table above

Vizion One computed the visit distribution by dividing each year discipline visits by each year total visits. It is noted that the application projections are inconsistent with the actual visit distribution. A comparison was then made between the two percentages. While PT and ST reflect about one-half of one percent, SN OT MSW and HHA vary significantly. This computation further demonstrates the unreliability of the HKZ projections due to the inconsistencies discussed previously.

The HKZ application should be rejected as best choice for awarding a CON for Mecklenburg County, for the following reasons:

The application utilizes projections including need from Union County which has not been identified as having sufficient unmet need by the SMFP and prevents like comparisons of competing applications.

The application utilizes inconsistent projections for duplicated patients between years without justification or support which skews the resulting visit projections.

The application contains inconsistencies between the HKZ projections, historical data from Mecklenburg County, and Healthkeeperz in historical CMS Medicare data which HKZ states the projections are consistent with resulting in a lack of reliance..

The inconsistency between visit distribution projections and actual visit distribution used in the financial prpojections.

The unreliable and inaccurate financial projections based upon inconsistent and unreliable projections.

Average Visits per Patient:

	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Year 1	17.28	15.96	21.68	17.50	19.06	22.94	17.24	18.28	18.98	25.03
Year 2	18.88	15.96	21.72	17.54	19.07	26.41	17.39	21.03	17.38	25.00
Variance	**-1.60**	**0.00**	**-0.03**	**-0.04**	**-0.01**	**-3.47**	**-0.15**	**-2.75**	**1.60**	**0.03**

The Average Visit per Patient was computed by dividing the projected Total Visits by the projected Unduplicated Patients Projected.

VII *STAFFING*

2. *(a)* *All applicants complete Table VII.2 for each of the first two years of operation after completion of the project.*

Vizion One obtained the various components of the FTE computations submitted by the applicants and calculated the FTE's based upon that information for for each applicant. The computed FTE's were then compared to the FTE's reflected in each application. The computation utilized 260 work days per year to compare all FTE's as the FTE's are required to be computed based upon 2,080 hours each. (5 day week * 52 weeks = 260 days) and (260 days * 8 hrs day = 2,080 hrs).The computations also utilized the visits per day to determine the number of visits required to equate to one FTE and the hours per visit.

The Visits by Discipline per each application were then divided by the total number of visits required per Discipline for one FTE to compute the FTE. A comparison was then made of the FTE's per Application to the calculated FTE's. The results for each year are as follows:

Visits per Week:

Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	25.0	20.0	25.0	25.0	27.5	25.0	22.50	22.35	20	25.0
LPN		27.5	29.5	25.0	0.0	25.0	29.00		15	
RN PRN		22.5								
PT	25.0	20.0	27.0	25.0	27.5	25.0	27.00	25.00	15	25.0
LPTA		27.5		25.0		25.0	27.00			
ST	25.0	20.0	26.5	25.0	27.5	25.0	22.00	1.65	10	25.0
OT	25.0	25.0	26.5	25.0	27.5	25.0	25.75	25.00	15	25.0
COTA		27.5					25.75			
MSW	17.5	20.0	15.0	17.5	20.0	25.0	16.50	17.00	5	15.0
HHA	27.0	27.5	26.0	30.0	32.5	25.0	27.00	25.00	15	25.0

*Source: Calculated Visits per Day * 5 Days Week*

Visits per Day:

Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	5		5.0	5.0	5.5	5	4.5	4.47	4	5
LPN			5.9	5		5	5.8		3	
RN PRN		4.0								
PT	5	5.5	5.4	5	5.5	5	5.4	5	3	5
LPTA		4.5		5		5	5.4			
ST	5	4.0	5.3	5	5.5	5	4.4	0.33	2	5
OT	5	5.5	5.3	5	5.5	5	5.15	5	3	5
COTA		4.0					5.15			
MSW	3.5	5.0	3.0	3.5	4	5	3.3	3.4	1	3
HHA	5.4	5.5	5.2	6	6.5	5	5.4	5	3	5

Source: CON Applications

Hours per Visit:

Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	1.6		1.6	1.6	1.5	1.6	1.8	1.8	2.0	1.6
LPN			1.4	1.6		1.6	1.4		2.7	
RN PRN		2.0								
PT	1.6	1.5	1.5	1.6	1.5	1.6	1.5	1.6	2.7	1.6
LPTA		1.8		1.6		1.6	1.5			
ST	1.6	2.0	1.5	1.6	1.5	1.6	1.8	24.2	4.0	1.6
OT	1.6	1.5	1.5	1.6	1.5	1.6	1.6	1.6	2.7	1.6
COTA		2.0								
MSW	2.3	1.6	2.7	2.3	2.0	1.6	2.4	2.4	8.0	2.7
HHA	1.56	1.5	1.5	1.3	1.2	1.6	1.5	1.6	2.7	1.6

Source: Calculated 8hrs a Day / 5Days a Week

Visit per Year:

Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	1,300		1,300	1,300	1,430	1,300	1,170	1,162.2	1,040	1,300
LPN			1,534	1,300		1,300	1,508		780	
RN PRN		1,040								
PT	1,300	1,430	1,404	1,300	1,430	1,300	1,404	1,300	780	1,300
LPTA		1,170		1,300		1,300	1,404			
ST	1,300	1,040	1,378	1,300	1,430	1,300	1,144	85.8	520	1,300
OT	1,300	1,430	1,378	1,300	1,430	1,300	1,339	1,300	780	1,300
COTA		1,040					1,339			
MSW	910	1,300	780	910	1,040	1,300	858	884	260	780
HHA	1,404	1,430	1,352	1,560	1,690	1,300	1,404	1,300	780	1,300

*Source: Calculated Visits per Day * 260 Days Year*

Visits per Application:

Year 1 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	3,392	23,171	3,177	2,853	4,251	3,106	595	1,772	26	2,408
PT	2,680	15,340	1,973	1,920	1,801	3,132	463	1,235	338	1,924
ST	182	632	108	114	144	432	31	35	78	113
OT	619	3,061	389	460	432	170	103	371	208	441
MSW	39	770	24	28	72	332	7	15	13	34
HHA	451	2,845	444	330	504	398	77	302	286	361
Total	**7,363**	**45,819**	**6,115**	**5,705**	**7,204**	**7,570**	**1,276**	**3,730**	**949**	**5,281**

Source: CON Applications

Year 2 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	4,376	24,162	4,457	3,080	6,648	5,138	3,972	5,449	182	3,707
PT	3,458	15,997	2,768	2,073	2,817	5,217	3,084	3,813	624	2,958
ST	235	659	151	123	225	279	228	122	78	173
OT	798	3,192	546	496	676	718	708	1,150	312	680
MSW	51	803	34	30	113	556	48	47	39	58
HHA	582	2,967	622	356	789	662	516	946	364	549
Total	**9,500**	**47,780**	**8,578**	**6,158**	**11,268**	**12,570**	**8,556**	**11,527**	**1,599**	**8,125**

Source: CON Applications

FTE'S for Comparison:

Year 1 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	2.61	22.28	2.44	2.19	2.97	2.39	0.51	1.52	0.03	1.85
PT	2.06	10.73	1.41	1.48	1.26	2.41	0.33	0.95	0.43	1.48
ST	0.14	0.54	0.08	0.09	0.10	0.33	0.03	0.41	0.15	0.09
OT	0.48	2.94	0.28	0.35	0.30	0.13	0.08	0.29	0.27	0.34
MSW	0.04	0.54	0.03	0.03	0.07	0.26	0.01	0.02	0.05	0.04
HHA	0.32	2.74	0.33	0.21	0.30	0.31	0.05	0.23	0.37	0.28
Total	**5.65**	**39.76**	**4.57**	**4.36**	**5.00**	**5.82**	**1.01**	**3.42**	**1.29**	**4.08**

Source: Calculated Discipline Visits / Visits per Year

Year 2 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	3.4	23.2	3.43	2.37	4.65	3.95	3.39	4.69	0.18	2.85
PT	2.7	11.2	1.97	1.59	1.97	4.01	2.20	2.93	0.80	2.28
ST	0.2	0.6	0.11	0.09	0.16	0.21	0.20	1.42	0.15	0.13
OT	0.6	3.1	0.40	0.38	0.47	0.55	0.53	0.88	0.40	0.52
MSW	0.1	0.6	0.04	0.03	0.11	0.43	0.06	0.05	0.15	0.07
HHA	0.4	2.9	0.46	0.23	0.47	0.51	0.37	0.73	0.47	0.42
Total	7.3	41.5	6.41	4.70	7.82	9.67	6.74	10.71	2.14	6.28

Source: Calculated Discipline Visits / Visits per Year

FTE's per Application:

Year 1 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	3.00	19.80	2.5	2.20	3.50	3.20	0.75	1.64	3.66	1.85
PT	2.25	11.00	1.5	1.48	1.30	3.20	0.41		4.66	1.48
ST	0.15	1.00	0.1	0.09	0.10	0.20	0.10		1.33	0.09
OT	0.50	2.50	0.3	0.35	0.03	0.45	0.05		3.33	0.34
MSW	0.10	1.00	0.03	0.03	0.10	0.35	0.02	0.17	0.16	0.04
HHA	0.40	2.50	0.5	0.21	0.04	0.40	0.07	0.25	4.66	0.28
Total	**6.40**	**37.80**	**4.93**	**4.36**	**5.07**	**7.80**	**1.40**	**2.06**	**17.8**	**4.08**

Source: CON Applications

Year 2 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	3.75	21.30	3.3	2.37	5.20	4.35	3.75	5.00	(A)	2.85
PT	2.75	14.70	2	1.60	2.00	4.40	2.58		(A)	2.28
ST	0.20	1.00	0.1	0.09	0.18	0.25	0.66		(A)	0.13
OT	0.75	2.50	0.4	0.38	0.50	0.60	0.25		(A)	0.52
MSW	0.10	1.00	0.04	0.03	0.02	0.45	0.25	0.3	(A)	0.07
HHA	0.50	2.50	0.5	0.23	0.06	0.55	0.48	0.8	(A)	0.42
Total	**8.05**	**43.00**	**6.34**	**4.70**	**7.96**	**10.60**	**7.97**	**6.10**	**(A)**	**6.27**

Source: CON Applications

FTE Variances:

Year 1 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	0.39	-2.48	0.06	0.01	0.53	0.81	0.24	0.12	3.64	0.00
PT	0.19	0.27	0.09	0.00	0.04	0.79	0.08	-0.95	4.23	0.00
ST	0.01	0.46	0.02	0.00	0.00	-0.13	0.07	-0.41	1.18	0.00
OT	0.02	-0.44	0.02	0.00	-0.27	0.32	-0.03	-0.29	3.06	0.00
MSW	0.06	0.46	0.00	0.00	0.03	0.09	0.01	0.15	0.11	0.00
HHA	0.08	-0.24	0.17	0.00	-0.26	0.09	0.02	0.02	4.29	0.00
Total	**0.75**	**-1.96**	**0.36**	**0.00**	**0.07**	**1.98**	**0.39**	**-1.36**	**16.51**	**0.00**

Source: Calculated FTE's for Comparison – FTE per CON Application

Year 2 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	0.38	-1.93	-0.13	0.00	0.55	0.40	0.36	0.31	(A)	0.00
PT	0.09	3.51	0.03	0.01	0.03	0.39	0.38	-2.93	(A)	0.00
ST	0.02	0.44	-0.01	0.00	0.02	0.04	0.46	-1.42	(A)	0.00
OT	0.14	-0.57	0.00	0.00	0.03	0.05	-0.28	-0.88	(A)	0.00
MSW	0.04	0.44	0.00	0.00	-0.09	0.02	0.19	0.25	(A)	0.00
HHA	0.09	-0.35	0.04	0.00	-0.41	0.04	0.11	0.07	(A)	0.00
Total	**0.76**	**1.53**	**-0.07**	**0.00**	**0.14**	**0.93**	**1.23**	**-4.61**	**(A)**	**-0.01**

Source: Calculated Source: Calculated FTE's for Comparison – FTE per CON Application

(B) No Year 2 FTE information in Application

No comments

Year 1	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	(27,744)	97,517	52,293	4,188	(36,329)	(1,127,468)	(15,609)	(8,139)	(1,222,416)	0.00
PT	(15,143)	(174,946)	40,527	8,853	(3,285)	(1,308,168)	(6,508)	-	23,425	0.00
ST	(780)	(39,268)	-	(19)	(1,462)	(97,165)	(1,533)	-	8,735	0.00
OT	(1,761)	45,464	-	25	157	(213,748)	(1,483)	-	15,982	0.00
MSW	(2,754)	(9,610)	-	15	(1,385)	(155,807)	(861)	848	364	0.00
HHA	5,501	5,692	(5,148)	1	(3,180)	(70,891)	(364)	(557)	(335,413)	0.00
Total	**(42,682)**	**(75,150)**	**87,682**	**13,063**	**(45,484)**	**(2,973,248)**	**(26,358)**	**(7,847)**	**(1,509,324)**	**(1)**
%	**(0.09)**	**(0.03)**	**(0.38)**	**0.04**	**(0.12)**	**(0.89)**	**(0.27)**	**(0.6)**	**(A) (0.90)**	**0.0**

Source: Calculated Source: Calculated FTE's for Comparison Wages –Form B Wages per CON Application

(C) Incomplete Form B located in Application ST, MSW and Administrative Cost missing.

Year 1	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
SN	(27,934)	131,045	52,619	4,667	(39,106)	(1,139,061)	(1,106)	(25,527)	(1,239,883)	2
PT	(7,412)	(185,030)	99,774	9,867	(2,509)	(1,276,598)	(16,138)	-	(74,900)	(1)
ST	(1,538)	(37,856)	-	(25)	(1,364)	(116,208)	(3,780)	-	-	(0)
OT	(10,308)	55,240	-	(1,713)	(2,107)	(204,103)	(10,398)	-	(33,964)	(2)
MSW	(46,627)	(9,266)	-	1,711	(4,234)	(157,511)	(10,726)	2,712	-	4
HHA	(2,847)	10,714	(1,231)	(5)	(4,286)	(72,525)	(2,493)	(1,781)	(374,664)	2
Total	**(96,665)**	**(35,154)**	**151,162**	**14,502**	**(53,605)**	**(2,966,005)**	**(44,640)**	**(24,596)**	**(1,723,411)**	**5**
%	**(0.15)**	**(0.01)**	**0.49**	**0.04**	**(0.09)**	**(0.79)**	**(0.09)**	**(0.06)**	**(A) (1.00)**	**0.00**

Source: Calculated Source: Calculated FTE's for Comparison Wages –Form B Wages per CON Application

(C) Incomplete Form B located in Application ST, MSW and Administrative Cost missing. No computations could be made as no Year 2 FTE information was contained in the application.

HKZ states on page 86 that productivity standards are based the NAHC productivity standards. No reference as to how Salaries and Wages were projected was identified in the application body. HKZ patient care staff are Nurses, Physical Therapist and Home Health Aides all other are contracted.

The negative amounts reflect analysis computations are less than wage amounts projected in the Form B Financial Statement. The negative amount indicated the applicant has overstated the expense for Discipline Wages. Again, Vizion One believes that in addition to over projection of FTE's and the resulting dollar amounts, all applicants are using wage estimates greater than the amounts applicable specifically to Mecklenburg County, NC as specified by the US Bureau of Labor 2011 Statistics Occupational Employment and Wages Estimates for Charlotte-Gastonia-Rock Hill, NC-SC. Vizion One utilizes the data as it was specific for the identified need area not a national average.

Position Average Salary for a full Time Employee:

Year 1 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	70,999	63,637	68,770	69,000	68,900	59760	64,645	71,000	58,233	62,504
LPN		36,293	47,000	44,100		39250	42,711		92,207	
RN PRN		64,047								
PT	80,353	83,197	100,000	81,500	81,000	67213	82,494		203,826	77,376
LPTA		74,508		56,000		47,750	51,385			
ST	78,014	85,396		75,500	75,000	83,495	73,089		58,233	69,014
OT	73,856	71,129		76,700	75,000	65,984	77,120		145,593	78,749
COTA		57,194					59,108			
MSW	48,190	20,821		50,377	45,000	65,617	54,190	50,000	7,276	44,741
HHA	32,500	29,419	30,000	29,000	31,250	26,270	21,110	32,250	97,060	20,155

Source: CON Applications

Year 2 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	72,774	64,591	70,627	71,070	70,967	73,987	65,938	72,420		64,067
LPN		36,838	48,269	45,423		40,035	43,627			
RN PRN		65,088								
PT	82,362	84,445	102,700	83,945	83,430	94,585	84,144			79,310
LPTA		75,626		57,680		48,705	52,413			
ST	79,964	86,677		77,765	77,250	112,828	74,551			70,740
OT	75,702	72,196		79,001	77,250	83,785	78,663			80,718
COTA		58,052					60,290			
MSW	49,395	21,134		51,888	46,350	86,872	55,274	51,000		45,917
HHA	33,313	30,363	30,810	29,870	32,188	32,493	21,532	32,895		20,659

Source: CON Applications

Year 2 Discipline	BLS Mean
RN	62,504
LPN	41,640
RN PRN	62,504
LPTA	51,960
PT	77,376
ST	69,014
OT	78,749
COTA	55,640
MSW	44,741
HHA	20,155

Source: BLS May 2011 Metropolitan and Non-metropolitan Area Occupational Employment and Wage Estimates, Charlotte-Gastonia-Rock Hill NC-SC

Wage Variances:

Year 2 Discipline	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	1.14	1.02	1.10	1.10	1.10	0.96	1.03	1.14	0.93	1.00
LPN		0.87	1.13	1.06		0.94	1.03		2.21	1.00
RN PRN		1.02								1.00
PT	1.04	1.08	1.29	1.05	1.05	0.87	1.07		2.63	1.00
LPTA		1.43		1.08		0.92	0.99			1.00
ST	1.13	1.24		1.09	1.09	1.21	1.06		0.84	1.00
OT	0.94	0.90		0.97	0.95	0.84	0.98		1.85	1.00
COTA		1.03					1.06			1.00
MSW	1.08	0.47		1.13	1.01	1.47	1.21	1.12	0.16	1.00
HHA	1.61	1.46	1.49	1.44	1.55	1.30	1.05	1.60	4.82	1.00

Source: Calculated Position Average Salary for a full Time Employee /2011 BLS Wage Estimate

Vizion One questions the accuracy of the "Position Average Salary for a full Time Employee" used by HKZ. As reflected above The Mean Salaries for employees in these positions is substantially lower than those projected by Maxim per the 2011 BLS Employment and Wage Estimates for the Mecklenburg County area. Vizion One believes the Projected Average Salaries are inflated and do not accurately reflect the wages in Mecklenburg County area.

As reflected above the application FTE projections overstate FTE's in year one and understates FTE's in year 2. Vizion One believes HKZ further overstates expenses by utilizing the NAHC Wage data as it reflects a national average not an area specific amount. Vizion One on the other hand has consistently utilized data specific to Mecklenburg County throughout its application.

The HKZ application should be rejected as best choice for awarding a CON for Mecklenburg County, for the following reasons:

The application utilizes projections including need from Union County which has not been identified as having sufficient unmet need by the SMFP and prevents like comparisons of competing applications.

The application utilizes inconsistent projections for duplicated patients between years without justification or support which skews the resulting visit projections.

The application contains inconsistencies between the HKZ projections, historical data from Mecklenburg County, and Healthkeeperz in historical CMS Medicare data which HKZ states the projections are consistent with resulting in a lack of reliance..

The inconsistency between visit distribution projections and actual visit distribution used in the financial prpojections.

The Position Average Salary for a Full-Time Employee exceed the 2011 BLS averages overstating wage expense..

The unreliable and inaccurate financial projections based upon inconsistent and unreliable projections.

VIII. CAPITAL COSTS AND FINANCING

1. Estimated Capital Costs of Proposed Project

N.C.G.S. 131E-176 (2a) defines a capital expenditure as an expenditure which under generally accepted accounting principles is not properly chargeable as an expense of operation and maintenance. In A, B and C below, provide the projected capital costs as follows:

(a) For a proposed new home health agency office, the applicant must use the most accurate estimates available for the development of the entire project.

(b) For an expansion or renovation of an existing home care agency, the applicant must use the most accurate estimates available for the development of the proposed addition or the renovation.

Capital Cost	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Construction Cost		245,500								
Equip/Computers	15,000	15,000	9,900	27,710	40,000	51,260	38,480	101,260	3,000	10,383
Furniture	10,000	49,500	10,000	4,164	20,000	23,953	11,440	22,100	3,000	4,910
Architect/Engineering		25,000								
Legal Fees						10,000				
Mkt Analysis						2,000				
CON Prep	40,000	65,000	42,500	-	35,000	19,500	750	55,000		40,000
Other		20,000				5,000	41,600			59,806
Contingency		30,000			15,000			17,836		
Total	**65,000**	**450,000**	**62,400**	**31,874**	**110,000**	**111,713**	**92,270**	**196,196**	**6,000**	**115,099**

Source: CON Applications

Vizion One has no comments at this time.

IX. START-UP AND INITIAL OPERATING EXPENSES/FINANCING

1. *Estimated Start-up Expenses*
2. *Estimated Initial Operating Expenses*
3. *Total Working Capital*

Start-up & Operating Expenses	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
Startup	40,000		122,137	65,966	70,000	102,283	42,826	171,554	20,000	99,807
Initial Operating Exp	225,000		31,,455	341,220	480,000	646,38	247,565	539,614	30,000	361,496
Initial Operating Period	6	0	9	6	6	3	12	19	1	7
Total Working Capital	265,000	0	153,592	407,186	550,000	1669,21	290,391	711,168	50,000	461,303

Source CON Applications

No comments

X. COST INFORMATION

1. *All applicants must complete Table X.1 to show the following:*
*Your existing licensed home care agency's **cost** per unit of care (visit or hour) during the current year of operation, by discipline, and the total **cost** per visit, by discipline, for the two years following completion of the proposed home health agency.*

Yr. 1 Cost per Visit	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	82.84	154.24	86.71	137.22	144.71	91.9	605.48	292.17	122,3873	132.01
PT	88.26	137.57	91.60	146.78	146.81	82.4	224.52	214.39	36,795	160.51
ST	84.56	179.81	75.00	146.84	151.89	123.12	332.90	214.39	8,491	144.49
OT	79.23	131.12	75.00	155.11	139.06	88.98	225.15	214.39	62,643	163.15
MSW	151.57	86.72	75.00	170.27	151.76	89.92	530.46	837.71	1,334	155.12
HHA	43.45	50.38	71.87	86.9	105.76	47.85	146.91	172.19	49,002	50.85

Source CON Applications

Yr. 2 Cost per Visit	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	82.35	158.38	88.96	137.95	135.77	93.38	165.26	169.2	1239883	115.02
PT	85.98	139.15	88.81	147.8	140.27	84.03	147.73	134.33	67929	139.86
ST	89.08	179.78	75.00	147.86	141.34	125.56	148.62	134.33	8491	125.9
OT	92.49	131.24	75.00	156.38	137.72	90.73	140.28	134.33	33964	142.16
MSW	122.65	87.15	75.00	171.99	168.05	91.7	499.63	408.8	4246	135.17
HHA	43.21	86.80	60.68	86.12	97.5	48.78	58.84	91.39	52664	44.27

Source CON Applications

Historical Cost per Visit:

2010 Cost per Visit	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN		166.26	98.11			129.35				
PT		148.27	152.5			110.9				
ST		204.44	107.84			177.81				
OT		168.10	182.25			122.97				
MSW		2000.33	362.36			117.84				
HHA		68.84	59.69			48.26				

Source: 2010 CMS HCRIS HHA Cost Reports, Updated 1/23/12

Historical Cost per Visit Variance:

	Year 1				Year 2		
2010 Cost per Visit	Health @ Home	HKZ	Emerald Care		Health @ Home	HKZ	Emerald Care
RN	-12.02	-11.40	-37.45		-7.88	-9.15	-35.97
PT	-10.7	-60.90	-28.5		-9.12	-63.69	-26.87
ST	-24.63	-32.84	-54.69		-24.66	-32.84	-52.25
OT	-36.98	-107.25	-33.99		-36.86	-107.25	-32.24
MSW	-1913.61	-287.36	-27.92		-1913.18	-287.36	-26.14
HHA	-18.46	12.18	-0.41		17.96	0.99	0.52

Source: Calculated Projected Cost per Visit – Historical Cost per Visit

Three Applicants have a history of services in Mecklenburg County. All three project Cost per Visits lower than their historical Cost per Visit for established Agencies which currently provide services in Mecklenburg County. Healthy @ Home served 327.8% more patients than its project year two projection. HKZ served 311.4% more patients in year two than it projects and Emerald Care served 401.5% more than it projects. Additionally, the CMS data reflects Healthy @ Home average visits per patient at 7.72 in 2010 while it projects 15.96 for this project. CMS data reflects average visit per patient for HKZ at 17.35 in 2010 while it projects 21.72 this project. Emerald Cares CMS data reflects 28.01 in 2010 while it projects 26.41 for this project. These three applicants are inconsistent with their historical data when making the projections for this project.

The HKZ application should be rejected as best choice for awarding a CON for Mecklenburg County, for the following reasons:

The application utilizes projections including need from Union County which has not been identified as having sufficient unmet need by the SMFP and prevents like comparisons of competing applications.

The application utilizes inconsistent projections for duplicated patients between years without justification or support which skews the resulting visit projections.

The application contains inconsistencies between the HKZ projections, historical data from Mecklenburg County, and Healthkeeperz in historical CMS Medicare data which HKZ states the projections are consistent with resulting in a lack of reliance..

The inconsistency between visit distribution projections and actual visit distribution used in the financial prpojections.

The Position Average Salary for a Full-Time Employee exceed the 2011 BLS averages overstating wage expense..

The unreliable and inaccurate financial projections based upon inconsistent and unreliable projections.

2. *CHARGE INFORMATION*

Complete Table X.2

Charges per Visit	Maxim	Health @ Home	HKZ	Assisted Care	Well Care	Emerald Care	Continuum	UniHealth	J & D Healthcare	Vizion One
RN	125	125	130	169	135	125	150	165	1223873	160
PT	130	125	145	180	135	141	150	175	36795	165
ST	130	125	145	169	145	142	150	175	8491	165
OT	130	125	145	169	145	142	150	175	62643	165
MSW	175	165	190	327	350	186	150	195	1334	180
HHA	70	60	65	82	70	65	95	65	49002	90

Source: CON Applications

The J & D Health Care reflects what appears to be Gross Revenues by discipline and does not reflect the information required for this section.