

DFS Health Planning  
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Medical Facilities  
PLANNING SECTION

Emerald Care, Inc.  
d/b/a Emerald Care, an Amedisys Company  
1050 Xray Drive  
Gastonia, NC 28054-7488

Amedisys, Inc.  
5959 S. Sherwood Forest Blvd.  
Baton Rouge, LA 70816

March 2, 2011

North Carolina State Health Coordinating Council  
701 Barbour Drive  
Raleigh, NC 27603

Re: Comments Presented at the Public Hearing on Chapter 12 of the 2011 North Carolina State Medical Facilities Plan (the "SMFP") on March 2, 2011

Dear Members of the Council,

I am speaking on behalf of Emerald Care, Inc., a Medicare-certified home health agency that has operated in Gastonia for the past 30 years and currently serves patients residing in the counties of Gaston, Catawba, Cleveland, Lincoln and Mecklenburg ("Emerald Care"). My name is Chris Hambrick, and I am the Vice President of Operations for North Carolina for Amedisys, Inc., a publicly traded health care company and the parent company of Emerald Care. Emerald Care supports the determinations of need for all four (4) home health agencies set forth in the 2011 SFMP as approved by Governor Perdue on December 21, 2010.

We have two primary reasons for supporting the determinations of need in the counties of Guilford, Mecklenburg, and Cabarrus. First, since the plan became effective in early January of 2011, Emerald Care has expended significant time, money, and effort in reliance on the need determinations contained in the 2011 SFMP. Second, Emerald Care has expended these resources to apply for a certificate of need in a county that Emerald Care already services, because a CON would permit Emerald Care to serve Mecklenburg's patients more quickly, more efficiently and more effectively.

Addressing the first point in more detail, Emerald Care has already invested significant resources in reliance on the 2011 SFMP in order to apply for a CON in Mecklenburg County. Among other requirements, the CON application requires that we have secured an office space, have held community meetings, received letters of support from physicians and other providers, provide audited financial reports from the past two years, and prepare detailed pro formas for the three project years that include projections of patient acuity, clinical staffing, resource utilization, payor mix, and financial performance. The deadline for completing these tasks and filing the CON application is in eleven (11) days, on March 15, 2011.

With the deadline quickly approaching, Emerald Care has already substantially completed its application for Mecklenburg County, including obtaining 35 letters of support from physicians and other providers who generously took time to support our CON application. All of these actions have been taken, both by us and

supportive members of the community, in reliance on the determinations of need set forth in the 2011 SFMP. Lastly, it is worth noting that home health agencies are not particularly capital intensive projects, and applying for a CON often represents a larger proportion of total project expenditures than it does in other facility-based projects.

Addressing the second point in more detail, Emerald Care currently serves patients in Gaston, Catawba, Cleveland, Lincoln, and Mecklenburg Counties from its existing CON-approved office in Gastonia. Emerald Care does not, however, have the authority to open an office in Mecklenburg County, which means that its clinicians must daily travel from the agency office in Gastonia to reach patients in their homes in Mecklenburg County. Emerald Care is thus applying for a CON in Mecklenburg County in order to better serve our existing patients and other similarly situated patients. We believe that establishing a CON-approved office in Mecklenburg County will enable us to serve more of Mecklenburg County's patients more quickly and more cost-effectively.

For the foregoing reasons, Emerald Care supports the determinations of need for home health agencies in Guilford, Mecklenburg, and Cabarrus Counties as set forth in the 2011 SFMP.

Thank you for your time and consideration.

Sincerely

A handwritten signature in black ink that reads "Chris Hambrick". The signature is written in a cursive style with a large, sweeping flourish at the end.

Chris Hambrick  
Vice President of Operations  
Amedisys, Inc.