

**STATE AGENCY ACTION REPORT**  
**ON APPLICATIONS FOR CERTIFICATE OF NEED**

**A. PROJECT IDENTIFICATION**

1. Applicant/CON Action Number

**Affinity Care of Palm Beach LLC/CON #10698**

709 S. Harbor City Blvd., Suite 540  
Melbourne, Florida 32901

Authorized Representative: Patti Greenberg  
(501) 499-9977

**Brevard HMA Hospice, LLC/CON #10699**

7840 Graphics Drive, Suite 100  
Tinley Park, Illinois 60477

Authorized Representative: Bryan Niehaus, J.D., C.H.C.  
Vice President - Advis  
(708) 478-7030

**Catholic Hospice, Inc./CON #10700**

14875 NW 77<sup>th</sup> Avenue, Suite 100  
Miami Lakes, Florida 33014

Authorized Representative: Joseph Catania  
President and CEO  
(305) 351-7101

**Florida Hospice, LLC/CON #10701**

5440 Corporate Drive, Suite 400  
Troy, Michigan 48098

Authorized Representative: Justin DeWitt, CEO  
(877) 421-0917

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by  
MorseLife/CON #10702**

4847 David S. Mack Drive  
West Palm Beach, Florida 33417

Authorized Representative: Keith A. Myers  
President and CEO  
(561) 687-5744

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**Odyssey Healthcare of Marion County, LLC/CON #10703**

655 Brawley School Road, Suite 200  
 Mooresville, North Carolina 28117

Authorized Representative: Gusti McGee  
 VP Regulatory & Licensure Services  
 Kindred at Home  
 (704) 664-2876

**ProMedica Hospice of Palm Beach County, FL, LLC/CON #10704**

803 Middlebrooks Circle  
 Tallahassee, Florida 32312

Authorized Representative: Michael D. Jernigan  
 Health Care Consultant  
 (850) 877-4332

**PruittHealth Hospice – Southeast Florida, LLC/CON #10705**

1626 Jeurgens Court  
 Norcross, Georgia 30093

Authorized Representative: Neil L. Pruitt, Jr.  
 Chairman & Chief Executive Officer  
 (770) 279-6200

**Seasons Hospice & Palliative Care of Palm Beach County, LLC/CON #10706**

6400 Shafer Court, Suite 700  
 Rosemont, Illinois 60018

Authorized Representatives: Todd A. Stern/Annemarie Switchulis  
 (847) 692-1127/(248) 928-6312

**Suncrest Hospice Florida, LLC/CON #10707**

1 Beach Drive SE, Suite 303  
 St. Petersburg, Florida 33701

Authorized Representatives: Kathleen M. Premo, BA, JD and  
 Clifford E. Barnes, BBA, MBA, JD  
 (727) 362-6144

**Transitions Intermediate Holdings, LLC/CON #10708**

1551 Bond Street #143  
Naperville, Illinois 60563

Authorized Representative: Jennifer Yarbrough  
Vice President of Strategies  
(224) 760-9011

2. Service District/Subdistrict

Service Area (SA) 9C – Palm Beach County

**B. Public Hearing**

A public hearing was not held or requested regarding the co-batched proposed projects.

**Letters of Support**

**Each** co-batched applicant submitted letters of support and some support letters were received by the Agency independently. These letters are addressed below.

**Affinity Care of Palm Beach LLC (CON application #10698):** The Agency particularly notes a letter of support from:

- Chip LaMarca, Representative, District 93 (Broward County), Florida House of Representatives

The applicant provides a large number of letters of support in Tab 5 of CON application #10698 citing the following categories:

- Health Systems, Hospital Organizations and Skilled Nursing Facilities (SNFs)
- Assisted Living Facilities (ALFs), Independent Living Communities and Home Health Agencies (HHAs)
- Physicians
- Jewish Organizations and Religious Leaders

Affinity Care of Palm Beach LLC also provides signed and dated Memorandums of Understandings (MOUs) with the following entities:

- Rendever, Inc.
- Colonial Skilled Nursing at Palm Beach, LLC (Colonial)
- The Encore at Boca Raton Rehabilitation and Nursing Center, LLC (Encore)

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The applicant's MOUs are described further in item E.2.a.(2) of this report. Various excerpts from support letters are presented in pages 34-39, 50-51, 54-61, 63-64 and 112-149 of the application.

**Brevard HMA Hospice, LLC (CON application #10699)** includes a large number of letters of support in Appendix I beginning on page 296 of CON #10699. These letters are presented in the following categories:

- Provider Executives/Administrators
- Physicians and Practitioners
- Provider Staff
- State/County/City Government
- Other

The reviewer notes that the sole letter of support under the "State/County/City Government" category is from William D. Snyder, Sheriff, Martin County, which is not part of the SA subject to this competitive CON review (SA 9C).

Brevard HMA Hospice, LLC presents excerpts of letters of support on CON application #10699 pages 25, 43-44, 46 and 81-83. The reviewer notes that some of the letters of support presented by excerpt are LHC Group staff/executives/board member(s).

**Catholic Hospice, Inc. (CON application #10700)** includes a large number of letters of support in Exhibit F and lists 39 of these by entity name on the application's page 32. Excerpts of the various referenced letters of support are presented on CON application #10700 pages 5, 24-25, 32-41, 48-50, 59, 63-65, 69, 74-76, 93-94, 98-99, 102-103, 112-121, 132-133, 139-148 and 154-156.

**Florida Hospice, LLC (CON application #10701)** provides 37 letters of support in Appendix A of the application. CON application #10701, page 279, lists by organization/entity name, in order and these letters are found on page numbers 280-317 of the application. The reviewer notes that of the 37 support letters, 13 indicate a Florida address and of those 13, nine have a Palm Beach County address.

The reviewer notes one of the letters of support indicates to expand into being able to offer general inpatient (GIP) hospice services via a joint venture or similar structure with Florida Hospice:

- Signature Healthcare, LLC's Signature Healthcare of Palm Beach

Florida Hospice, LLC also provides excerpts of its letters of support on CON application #10701 pages 14-24 and 32.

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**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** includes a very large number of letters of support in the application's Volume 2, Tab 10-Additional Information. These are cited by the following categories:

- Community Members/Organizations
- Religious Organizations
- Academic Organizations
- Health Care Providers/Organizations
- Firms/Businesses
- Letters from Family Members and Patients

The Agency particularly notes a letter of support from the following elected official:

- Ric L. Bradshaw, Sheriff, Palm Beach County

The applicant also presents various excerpts from its letters of support on CON application #10702 pages 1-2, 1-10, 1-16, 1-20, 2-15, 2-19, 2-22, 2-27, 2-31, 3-7, 4-2, 4-10, 5-2, 5-15 and 9-2.

In addition, the Agency particularly notes two letters of support for this project (Exhibit PS-1 and page 6-2 of the application) from David C. Fielding, President & CEO of Trustbridge, Inc., which has controlling interest in two SA 9C licensed hospices, Hospice by the Sea, Inc. and Hospice of Palm Beach County, Inc.

The Trustbridge, Inc., affiliated SA 9C hospices providers reported 77.57 percent of the total hospice service area admissions in SA 9C for the 12 months ending June 30, 2021, with 9,100 of the SA's reported 11,732 admissions. See item E.1.a. of this report for the SA's total admissions.

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** includes letters of support in the application's Exhibit 4. Various excerpts of these letters are included on the application's pages 29 and 47-49.

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704)** provides letters of support/appreciation as follows:

- Attachment 4 - The reviewer notes that many of these letters of support are from affiliated skilled nursing facilities (SNFs) - Heartland Healthcare Centers and ManorCare Health Services - as well as affiliated Arden Courts (memory care communities). Further a relatively high number of letters of support are from Swallowing Diagnostics, Inc., which is located in SA 10 - Broward County
- Attachment 7 - Typed letters of appreciation

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)** offers what appears to be a single redacted handwritten testimonial (a PDF version) concerning PruittHealth respiratory therapy services at one of PruittHealth’s non-Florida hospices (pages 56 and 57, Figure 36 of the application). There are no other letters of support. The reviewer reaches this conclusion based on the following facts. CON application #10705 provides a total of three “books” (or volumes) to its application. The applicant’s Book 1 master table of contents shows a total of:

- Five sections (Book 1) and a total of 35 exhibits (spread between Books 2 and 3)
- The Book 1 master table of contents references Book 3/Exhibit 20/Letters of Support. However, CON application #10705’s Book 3 table of contents indicates Exhibit 20-Cardiac Care Pathway (and includes materials regarding PruittHealth’s hospice care regarding heart disease) - but letters of support
- Book 3 table of contents indicates Exhibit 34-Letters of Support but does not include no letters of support
- The applicant’s Book 1 master table of contents references no other letter of support exhibits

Other discrepancies between CON application #10705’s Book 1 master table of contents and the tables on contents in the remaining two books are briefly described in item E.1.a. of this report.

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** provides a large number of letters of support in Exhibit 4 the application. These are listed on the application’s pages 113-114 by entity/provider name/organization under the following organization types:

- Academic Institutions
- Assisted Living Facilities (ALFs)
- Community Organizations (includes specialized groups)
- Food Pantry
- Home Health
- Homeless Organizations
- Hospitals
- Physician, Medical Group or Health Center
- Mental Health or Substance Use Treatment
- Other Providers (non-medical)
- Pediatric Medicine
- Religious Entities
- Residents
- Skilled Nursing Facility (SNF) or Rehabilitation Centers

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These support letters discuss Seasons' past provision of high-quality hospice care in Florida and demonstrate the widespread appreciation for the services Seasons offers by other healthcare providers, community organizations and residents. Various excerpts of these letters are presented on CON application #10706 pages 13, 19, 25, 33, 35, 37, 40-41, 45, 48, 52, 55, 62, 68-69, 71, 93, 95, 100, 105, 112, and 161-162.

**Suncrest Hospice Florida, LLC (CON application #10707)** provides a large number of letters of support in Exhibit G and also includes some in the Exhibits K, L, M, N and O of the application. The reviewer notes that Exhibit G there is a segment titled "Table 11 Hospice Focused Pharmacy Letters" and Exhibit O is titled "Table 11 Patient and Family Letters". The applicant has two Table 11s that have different titles.

CON application #10707 pages 87-89, includes Table 12-Suncrest Florida Community Support specific to Exhibit G which lists support letters by entity/provider name/organization under the following organization types:

- Senior Living
- Assisted Living
- Clinical Staffing Agency for Assisted Living
- Physicians and Mid-Level Practitioners
- Community Organizations
- Patients & Families
- State & Local Government
- Hospice Focused Pharmacies
- Insurance
- Partnership
- Law Offices
- Other Entities

These support letters endorse the applicant's expansion of its hospice services into Palm Beach County. Various excerpts of these letters are cited on the application's pages 22, 43-46, 76 and 78.

**Transitions Intermediate Holdings, LLC (CON application #10708)** includes 10 letters of support (between pages 64 and 65 of the application). Of the letters of support that had an address, none indicated having originated in Florida, most indicated an Illinois address.

**C. PROJECT SUMMARY**

The applicants propose to establish a new hospice program in SA 9C in response to the published need.

**Affinity Care of Palm Beach LLC (CON application #10698)**, referenced as Affinity Care, or the applicant, is a development stage corporation, and an affiliate of Continuum Care Hospice and Affinity Health Management. Collectively, the organization has hospice programs in Florida, New Jersey, Ohio, Virginia and Washington.

Affinity Global Management, LLC d/b/a Continuum Palliative of Florida was established on January 7, 2021 and is the entity that will provide palliative care to patients who reside in the Affinity/Continuum SA that are pre-hospice.

Affinity has two Florida operational hospice affiliates - Continuum Care of Sarasota LLC in SA 8D (licensed 6/18/2021) and Continuum Care of Broward LLC in SA 10 (licensed 11/5/2020) and two CON-approved pending licensure - Affinity Care of Manatee County (CON #10651) and Continuum Care of Miami-Dade LLC (CON #10658). In this batching cycle, Affinity Care also proposes to establish a new hospice program in SA 6B.

The applicant expects issuance of license in April 2022 and initiation of service in May 2022.

Total project cost which includes equipment, project development, and start-up costs is \$388,200.

Pursuant to project approval, Affinity Care of Palm Beach LLC offers the following Schedule C conditions:

**Clinical Specialty Programs**

**1. Glades Initiative**

- The Applicant has conditioned approval of this application on the provision it will provide specific initiatives to enhance access to and utilization of hospice in The Glades.
  
- The Applicant will establish a satellite office in The Glades to provide visibility, community participation and serve as a convenient home base for team members covering that area of the County.



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- Affinity's care team serving The Glades will have a specific hospice care team that is representative of the minority community and bilingual. This team will include, at a minimum, a nurse, social worker and chaplain.
- The Applicant will partner with Lakeside Medical Center and the Health Care District of Palm Beach County to increase awareness of hospice services. A community relations representative will regularly be on site at the facility to meet with hospice appropriate patients and answer any and all questions they or their caregivers may have about hospice and Affinity Palm Beach to optimize early enrollment in hospice to enhance quality of life for terminal patients while reducing unnecessary re-hospitalizations.
- The Applicant will partner with existing community organizations and resources that service the Black and Hispanic communities in The Glades, such as but not limited to The Glades Initiative, federally qualified health clinics, local churches and community centers, to educate on the benefits of hospice.

### **2. Jewish Hospice Care Initiative**

- The Applicant will provide a Jewish Hospice Care Initiative to Jewish patients in a manner that recognizes Jewish heritage, history and traditions.
- The Applicant will seek accreditation for its Jewish Hospice services through the National Institute for Jewish Hospice (NIJH). NIJH provides staff training on the cultural beliefs and sensitivities so that the hospice provider can better serve the Jewish terminally ill.
- The Applicant will employ a rabbi to serve as a chaplain on the hospice team.
- The Applicant will work with Rales Jewish Family Services (JFS) to sponsor quarterly community education events and workshops at JFS community centers regarding the benefits of hospice services, including an explanation of the hospice benefit available under Medicare, the interdisciplinary team approach to care for patients in hospice, and the ways in which hospice can meet the physical, emotional, and spiritual needs of Jewish patient and the patient's family at the end of life.

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- The Applicant will establish specific protocols for meeting the special needs of the Jewish population including having a focus on the needs and providing recognition and support for holocaust survivors; addressing pain control measures, and providing life sustaining measures in accordance with religious observances; coordinating with and having available support from local Rabbis for spiritual care, guidance and consultation; coordinating with JFS and its partners to ensure patient plans of care include recognition of Kosher diet requirements of patients.
- The Applicant will have a Jewish services coordinator on its staff available to respond to needs of Jewish patients, and to be available to respond to any requests from JFS or other Jewish community organizations for assistance and evaluation of patients, including but not limited to 24/7 triage coverage, physical visits to access hospice eligibility of patients and admission regardless of ability to pay (charity patients); and availability of palliative care programs for Jewish patients that are in need of support but do not presently meet the requirements for admission to hospice care.
- The Applicant will develop a bereavement program specifically designed to address the needs of the Jewish patients, families, caregivers and those who are in need of grief support regardless if they are associated with hospice services.
- The Applicant will work with Rendever, its Virtual Reality designer, to create a special virtual reality platform for the Jewish population that honors the history and plight of the Jewish experience and provides “travel” to religiously significant sites and experiences throughout the world.
- The Applicant and Rales JFS will continuously collaborate with each other to identify additional opportunities to improve the delivery of hospice and palliative care to the Jewish population in Palm Beach County.

### **3. EMS Community Paramedic Program**

- The Applicant will develop and initiate a community paramedic program in coordination with local EMS providers, during year two.
- The Applicant will provide funding to local EMS providers for community paramedics, beginning in year two.

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- The Applicant will provide education and training of community paramedics on the program and criteria.

**4. Affinity Alzheimer's and Dementia Care**

- The Applicant will implement the Affinity Alzheimer's and Dementia Care program which was designed to bring the latest innovations in end-of-life care to Alzheimer's and dementia patients and their caregivers.
- All staff will be required to complete 2.5 hours of Continuing Education Units (CEUs) covering evidence based protocols for behavioral symptoms, in addition to Florida's minimum requirement.
- All patients in this program will be provided with music therapy and a textile box.
- The Applicant will offer a specifically tailored caregiver support group for those with loved ones battling Alzheimer's and dementia.
- Affinity Care will work with area facilities, such as nursing homes, who have patients with dementia, to educate their clinical staff on treatment criteria and programs.

**5. Affinity Pulmonary Care**

- The Applicant will offer the Affinity Pulmonary Care program to improve end-of-life care for patients suffering from pulmonary diagnosis. The Applicant will increase the awareness among healthcare providers and Service Area 9C residents about hospice care for patients confronted with pulmonary diseases.
- The Applicant will employ a respiratory therapist upon certification who will manage the patient's respiratory plan of care and provide respiratory related education to the patient, their family and to the hospice team and the community.
- The Applicant will collaborate with a community Pulmonologists and other pulmonary care professionals on an ongoing basis to assist in patient assessments, education and provision of services.

**6. Affinity Cardiac Care**

- The Applicant will implement the Affinity Cardiac Care program designed to improve the end-of-life care for patients suffering from end stage cardiac diseases along with increasing the awareness among healthcare providers and Service Area 9C residents on the importance of hospice care for patients confronted with end stage cardiac disease.
- All Affinity Palm Beach staff will be provided specialized education on the management of end stage cardiac patients.
- The Applicant will collaborate with community Cardiologists and other cardiac professionals on an ongoing basis to assist in patient assessments, education and provision of services.

**7. Continuum Palliative Resources**

- The Applicant will implement its Continuum Palliative Resources program within six months of receiving its Medicare certification. This will provide patients with relief from symptoms and pain, supporting the best quality of life, before the patient terminates treatment and qualifies for hospice. This will significantly improve the perception of hospice, repair the negative image hospice historically has amongst minorities and help to develop an end of life care plan designed for the individual. Combined, the approach to hospice treatment, education and outreach, staffing with culturally like personnel and providing palliative care as a pathway or bridge to hospice, the Applicant will be lifting up the lower minority penetration rates for both Blacks and Hispanics.
- The Applicant will conduct community education on advance care planning (i.e. living wills, durable power of attorney, review of 5 wishes document).
- The Applicant will provide physician-led palliative care services including social work and chaplaincy, either within facilities or in the patient's place of residence.

**8. Veterans Outreach Program**

- The Applicant will implement its Veterans outreach program, We Honor Veterans, once certified and will strive to achieve Level 5 certification to increase and improve the quality of care program for Veterans in Palm Beach County.

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- The Applicant will designate one of its hospice liaisons to carry out all Veterans outreach initiatives.
- The Applicant's Virtual Reality platform will offer Veterans a virtual flightless experience for Veterans who are unable to participate in the Honor Flight Network trip. The Honor Flight Network is a national network of independent Hubs working together to show our nation's veterans the appreciation and honor they deserve.

### **Quality and Patient Satisfaction Initiatives and Programming Beyond the Hospice Benefit**

- 9.** The Applicant will offer a personal emergency response indicator such as Life Alert, to every patient at home.
- 10.** The Applicant will provide triage coverage 24 hours a day, 7 days a week, and physical visits to assess hospice eligibility of patients and admission regardless of ability to pay (charity patients).
- 11.** The Applicant will have a designated Quality Director to conduct quality assessments, monitoring, and report all issues to senior management.
- 12.** The Applicant will become accredited by CHAP once certified.
- 13.** The Applicant will have a confidential compliance hotline available for its employees who may have concerns with state or Medicare regulations and/or standards of conduct. The hotline, available 24 hours a day, 7 days a week, will maintain anonymity upon request.
- 14.** The Applicant will implement its Virtual Reality Program upon licensure of its program. It will be made available to all eligible Affinity Palm Beach patients.
- 15.** The Applicant will implement its Music Therapy Program upon licensure of its program. It will staff a minimum of one Board Certified Music Therapist. It will be made available to all eligible Affinity Palm Beach patients.
- 16.** The Applicant will implement its Equine Therapy Program upon Medicare certification of its program. It will be made available to all eligible Affinity Palm Beach patients who are physically able to make the trip to the stable partner.

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- 17.** The Applicant will assure each patient has 5 to 7 Home Health Aide visits per week, provided this is acceptable to the IDT, patient and family.
- 18.** The Applicant will assure each patient has a minimum of 2 RN visits per week, provided this is acceptable to the IDT, patient and family.
- 19.** Affinity Care commits to increasing visit frequency during the final weeks of life to provide support. The Applicant will utilize Muse Healthcare Analytics to assist in identifying patients who are entering their final days of life.
- 20.** The Applicant will seek to respond to all referrals within one hour, initiate the assessment process within two hours, and expedite admission to the hospice subject to having a physician order in hand and the patient/family selecting the hospice option.

Affinity's preamble states it is willing to accept any conditions based on its presentations in the application, will provide all required hospice components as required by licensure and Medicare conditions of participation, and will serve all types of patients. The applicant also included suggested condition measurements, which are not included here.

**Brevard HMA Hospice, LLC (CON application #10699)**, also referenced as Brevard or the applicant, is a licensed for-profit Florida hospice serving SA 7A as Wuesthoff Health System Brevard Hospice and Palliative Care. Brevard references this project as Mederi Hospice.

The applicant is an affiliate of/managed by LHC Group (or LHC), which is stated to operate in 35 states and the District of Columbia providing "a broad array of services, including home health, hospice, palliative care, home and community based services, long-term acute care hospitals, advanced practice providers and healthcare innovation service lines-including Imperium Health our ACO management company".

In this batching cycle, LHC Group also proposes to establish new hospice programs in SAs 1, 3B, 6B and 9A. Brevard HMA Hospice, LLC is the applicant for all SAs except SA 1, which was filed by LHC's OMNI Home Health-District 1, LLC.

The applicant expects issuance of license and initiation of service to occur in July 2022.

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Total project costs are projected to be \$483,497.50 and include equipment, project development, and start-up costs.

Pursuant to project approval, Brevard proposes the following Schedule C conditions, which are presented below verbatim. We included portions of LHC Group's "Measure" when they provide a timeline for meeting the condition.

### **Commitment to Hospice & Palliative Medicine Fellowship Program Development Support**

- **COMMITMENT:** LHC Group, on behalf of Mederi Hospice, commits to offering \$25,000 to willing and able partners to support the establishment of a Hospice and Palliative Medicine Fellowship Program within District 9C. With an ever-growing shortage of trained medical professionals for hospice services, LHC Group believes investment in expanding hospice education programs is a critical tool to ensure ongoing access and quality. LHC Group's "Measure" indicates it expects to identify, select, and fund a partner within 2 years of its hospice program opening but will seek to conclude the process as soon as possible.

### **Commitment to Nursing Program Support**

- **COMMITMENT:** LHC Group, on behalf of Mederi Hospice, commits to offering \$25,000 to a local nursing program within District 9C to support the development of a hospice and palliative care training course, along with LHC Group offering students rotations under its new hospice program. LHC Group has experience in supporting local nursing education programs and looks forward to participating and supporting the growing workforce needs for hospice care into the future. LHC Group's "Measure" indicates it expects to identify, select, and fund a partner within 2 years of its hospice program opening but will seek to conclude the process as soon as possible.

### **Commitment to Palliative Care Program Development**

- **COMMITMENT:** Mederi Hospice commits to establishing a palliative program for the service area once the program operates at an ADC of 50 – which LHC Group expects to reach by the end of its first year based on its projections. This will ensure the continuum of care is secured for patients that are often approaching a need for hospice, but have not yet qualified, are able to receive treatments they require under palliative care.

**Commitment to Serve Patients without Primary Caregivers**

- **COMMITMENT:** Mederi Hospice commits to make funding in the amount of \$25,000 available for free room and board at inpatient facilities to support patients without a primary caregiver. These funds will provide patients with care options otherwise unavailable and alleviate undue stress at the end of life.

**Commitment to Serve the Homeless Population**

- **COMMITMENT:** Mederi Hospice commits to targeting and serving the homeless population of District 9C as part of our program development should we be approved to provide hospice services. We will set aside \$25,000 to specifically fund support for homeless patients and execute a program of outreach and offer care through local organizations such as the Homeless Coalition of Palm Beach County, and other local churches and organizations in accord with our charity care guidelines to ensure those patients in need of care are not denied access based on their means to pay.

**Commitment to Support Local Department of Aging Services**

- **COMMITMENT:** Mederi Hospice commits to funding the Area Agency on Aging of Palm Beach/Treasure Coast, Inc. organization with \$25,000 to support their existing programs for the elderly. With most hospice patient being of advanced age, the council for aging provides support services that continue to benefit, educate, and serve hospice patients and their families both before and during their hospice benefit.

LHC Group's "Measure" states it will complete the donation within its first two years of operation and report on the donation to the Area Agency on Aging of Palm Beach/Treasure Coast, Inc. as part of its annual report to AHCA.

**Hospice Promise Foundation**

- **COMMITMENT:** Beyond its above commitments. LHC Group commits to funding its Hospice Promise Foundation with \$25,000 to support local requests for support from patients. This will ensure access to charitable funding for our patients without competing with local providers for funds.

**Community Hospice Education**

- **COMMITMENT:** Mederi Hospice commits to funding and providing specific community education and outreach regarding availability of hospice services within the service area over the first two years of service implementation. Mederi Hospice commits to:



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- a. Conducting at least fifty (50) one-on-one outreach sessions with healthcare providers and community organizations.
- b. Monthly Facebook Live presentations such as Hospice Hangout to provide end-of-life education and support to the community.
- c. Initiate the Pet Peace of Mind Program within the first 24 months. This is a non-profit program that helps patients with terminal illness provide adequate care for their pets as well as helping with placement of pets if needed.
- d. Initiate Grief Speak online grief support program within the first 3 months that is available for any families served by the location as well as anyone in the community needing support. Grief Speak is presented every second Tuesday of the month from 6-8pm CST. During Grief Speak, one of LHC Group's bereavement coordinators or chaplains makes an informative presentation on grief and how to navigate its sometimes very confusing journey.
- e. Initiate Community Grief Support Program within the first 6 months for any families served by the location as well as anyone in the community needing support.
- f. Initiate a Caregiver Support Program within the first 6 months for any families served by the location as well as anyone in the community needing support and caregiving education.
- g. Provide an online community resource for end-of-life education with HospiceWePromise.com

### **We Honor Veterans Program**

- **COMMITMENT:** Mederi Hospice will actively seek We Honor Veterans status once operational and we will progress through each level as rapidly as possible to reflect our belief in the importance and unique needs of hospice care for our veterans. Mederi Hospice will advocate for Veteran patients to participate in Honor Flight for Veterans. The provider will also actively recruit Veteran volunteers to better support Veteran patients.

### **Hospice Office Development**

- **COMMITMENT:** Mederi Hospice commits to a principal care delivery site at 4 Harvard Cir#950, West Palm Beach, FL 33409 (or like site within same region pending finalization of lease terms), upon program inception and tracking completion of the proposed arrangements with AHCA.

### **The Joint Commission Accreditation**

- **COMMITMENT:** Mederi Hospice commits to pursuing and obtaining accreditation by The Joint Commission by the end of its first year of operation.

**Medicaid Enrollment**

- **COMMITMENT:** LHC intends to serve the Medicaid Community and shall seek Medicaid enrollment immediately upon receiving Medicare approval.

**Catholic Hospice, Inc. (CON application #10700)** also referenced as Catholic Hospice or the applicant, is a Florida, faith-based, non-profit organization licensed for hospice services in SAs 10 (since CY 2008) and 11 (since 1988).

The applicant expects issuance of license and initiation of service in April 2022.

The applicant proposes \$563,429 in total project costs, which include equipment, project development and start-up costs.

The applicant's proposed conditions are presented below verbatim, with the exception that its suggested condition measurements are only included when adding to the substance of the proposed condition. Pursuant to project approval, Catholic Hospice offers the following Schedule C conditions:

**1. Enhance Access to Disease-Specific Care**

- Catholic Hospice will implement a heart failure program for residents of Palm Beach County who are in late stages of disease and in need of hospice care. The heart failure program will include the development and implementation of a program for Inotropic therapy by the end of the first year.
- Catholic Hospice will develop disease-specific programming for Palm Beach patients suffering from Alzheimer's Disease. Catholic Hospice will develop a strong relationship with the Alzheimer's group in Palm Beach (similar to their relationship with the Alzheimer's group in Miami-Dade County).

**2. Enhance Access Ethnic Community-Specific Care**

- Catholic Hospice will dedicate a team to conduct outreach activities in Palm Beach County, including an allocation of personnel to assist in these activities.
- Catholic Hospice commits to providing programs for the Hispanic/Latinx and African American populations which will

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include support from or involvement of bilingual staff and volunteers, translated literature, training on cultural differences and competencies, population specific support groups, bereavement services, and education, and flexible programing to meet identified needs.

Proposed Measure: This will be measured by reporting the expenditures of the funds and reports presented to AHCA detailing the progress of the development of the program. This will also be measured through annual reporting of calendar/schedule of activities for the outreach and educational team.

### **3. Enhance Access for Homeless and Low-Income Populations**

- Catholic Hospice will allocate \$2,500 annually for three years to the Community Health Center of Palm Beach which supports unfunded and undocumented community members by providing an array of medical services.
- Catholic Hospice will develop a targeted hospice program that will enable its care teams to provide hospice services to patients where they reside, whether in an emergency shelter, safe have, or transitional housing.
- Catholic Palliative Care Services will develop a collaborative program in Palm Beach County that will assist community patients with advanced illness to navigate the health care system, link them to the right level of care at the right time, and identify patients who are medically eligible for hospice earlier in their disease process.
- Catholic Hospice will organize a team to offer specialized programming and education seminars for these patient populations as well as organizations and providers that serve these patient populations.

### **4. Enhance Access for the Veteran Population**

- Catholic Hospice will pursue We Honor Veterans Level 5 Partnership Certification within the first year of operation in Palm Beach County.
- Catholic Hospice will develop a specialized veteran's program in Palm Beach County and collaborate with area veterans' organizations.

**5. Other Specialized Experience**

**A. Enhance the Continuum of Care**

- Catholic Hospice will expand myUnity by Netsmart, their electronic health record system, to Palm Beach County.
- Catholic Hospice plans to develop relationships with local healthcare providers throughout the service area, including nursing homes and hospitals, for hospice patients.
  - Catholic Hospice will extend their existing agreement with Bethesda Hospital – Baptist Health South Florida to include Bethesda Hospital East and Bethesda Hospital West, for the provision of general inpatient hospice care.
- Catholic Hospice will collaborate with area mental health providers to ensure that mental health patients in need of hospice and palliative care are able to appropriately access the needed services.
  - Catholic Hospice will contribute \$2,500 annually for the first three years to enhance access to hospice and palliative care for mental health patients, working with the Southeast Florida Behavioral Health Network to determine where to contribute the money.

**B. Enhance Access to Palliative Care Programming**

- Catholic Hospice Care Services, Inc., a wholly owned subsidiary of Catholic Hospice, Inc., will implement services in Palm Beach County.
- Catholic Palliative Care Services, Inc. will develop teams at area hospitals to better serve patients.
- Catholic Hospice will extend Camp Erin bereavement camp to Palm Beach County to children between the ages of 6 and 17.
- Catholic Hospice will provide \$5,000 annually towards the Wishes Granted program designated for end-of-life wishes for Catholic Hospice patients and their families.

**C. Enhance Access to Transportation**

- Catholic Hospice will allocate \$20,000 per year for three years to fund programs to address transportation challenges in Palm Beach County to the United Way of Palm Beach County in relation to the 211 Project utilizing Lyft® services for transportation to medical appointments for hospice patients, their caregivers, and residents of Palm Beach County struggling with chronic disease management.

**6. Limited Fundraising in Palm Beach County**

- Catholic Hospice proposes to limit its fundraising efforts in Palm Beach County to memorial gifts on behalf of Catholic Hospice patients who have died.

Proposed Measure: This will be measured by annual reports presented to AHCA detailing funds raised in Palm Beach County.

**Florida Hospice, LLC (CON application #10701)**, also referenced as Florida Hospice or the applicant, is a development stage, for-profit Florida entity and is an affiliate of Residential Healthcare Group, Inc. The companies that comprise Graham Healthcare Group, a subsidiary of Graham Holdings Company (the ultimate parent) include:

- Residential Healthcare Group
- Allegheny Health Network Healthcare@Home
- Mary Free Bed at Home

Residential Healthcare Group parents the following:

- Residential Home Health (founded in 2001)
- Residential Palliative (founded in 2015)
- Residential Hospice (founded in 2011)

Graham Healthcare Group (or Graham) is a full-continuum post-acute provider that participates in joint ventures and wholly owns and operates hospice and home health units in Illinois, Michigan and Pennsylvania.

Graham's Residential Healthcare Group, Inc., does not currently provide and is not currently CON-approved for licensure to provide a hospice program in Florida.

In this batching cycle, Florida Hospice, LLC also proposes to establish new hospice programs in SAs 1 and 6B.

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The applicant expects issuance of license and initiation of service in July 2022.

The applicant proposes \$523,551 in total project costs, which include equipment, project development and start-up costs.

Pursuant to project approval, Florida Hospice, LLC offers the following Schedule C conditions:

The applicant's proposed conditions are presented below verbatim, with the exception that its suggested condition measurements are not included. Florida Hospice, LLC agrees to condition the award of this CON application upon the following:

1. Florida Hospice will provide \$75,000 over five years (\$15,000 per year) to Palm Beach State College to provide BSN Nursing Scholarships.
2. Florida Hospice will spend \$15,000 over five years (\$3,000 per year) to conduct an annual "Bereavement Summit" for local clergy and pastoral staff to provide education on bereavement issues and services. Any expenditures for this summit will be done in accordance with Florida Hospice's compliance program, policies and procedures, applicable state and federal law and related guidance.
3. Florida Hospice will spend \$8,000 over five years (\$1,600 per year) to conduct free "Lunch & Learn" meetings to educate healthcare providers on hospice, hospice services and bereavement issues and services. Any expenditures for "Lunch & Learn" meetings will be done in accordance with Florida Hospice's compliance program, policies and procedures, applicable state and federal law and related guidance.
4. Florida Hospice will offer free Open Community "Lunch & Learn" meetings to provide education to the public on hospice, hospice services and bereavement issues and services. Any expenditures for "Lunch & Learn" meetings will be done in accordance with Florida Hospice's compliance program, policies and procedures, applicable state and federal law and related guidance.
5. Florida Hospice will provide \$30,000 over five years (\$6,000 per year) to "Meals and Wheels of the Palm Beaches" to provide meals for seniors who do not qualify for government funded meals.

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6. Florida Hospice will provide \$30,000 over five years (\$6,000 per year) to the “Palm Beach County Homeless Coalition” to provide aid to the homeless population of Palm Beach.
7. Florida Hospice will spend \$18,000 over five years (\$3,600 per year) to assist families and caregivers with transportation expenses related to visiting their loved one in hospice care. Any transportation expenses related to these visits be done in accordance with Florida Hospice’s compliance program, policies and procedures, applicable state and federal law and related guidance.
8. Florida Hospice will spend \$9,000 over five years (\$1,800 per year) to conduct Grief Support Groups for family members and caregivers through a quarterly series of 3-evening meetings focused on grief support. The provision of such Grief Support services will be in addition to any bereavement counseling offered to Medicare beneficiaries and their immediate family members.
9. Florida Hospice will spend \$25,000 over five years (\$5,000 per year) to conduct an annual two-day Children’s Healing Hearts Camp for children in the community who have lost a loved one.
10. Florida Hospice will begin operations no later than July 2022 if there is no appeal, or no more than 120 days following final approval and issuance of a certificate of need to establish a new hospice program in Hospice Service Area 9C.
11. Florida Hospice will comply with all licensure requirements and will file all required data and reports in a timely manner as required by the Agency.
12. Florida Hospice will participate in the Medicare and Medicaid Programs, and will collect, submit, and participate in the CMS Hospice Quality Reporting Systems (HIS and CAHPS).
13. Florida Hospice will achieve full accreditation from the Accreditation Commission for Health Care within 18 months of initial licensure.
14. Florida Hospice will provide inpatient hospice services through collaboration with existing inpatient health care providers including hospitals and skilled nursing facilities.
15. Florida Hospice will submit its hospice training provider program and curriculum to the Department of Elder Affairs for approval.

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16. Florida Hospice will develop and submit its Comprehensive Emergency Management Plan (CEMP) to the Department of Elder Affairs for approval.
17. Florida Hospice will provide the free programs and services that are not specifically covered by private insurance, Medicaid, or Medicare as described in this certificate of need application to its hospice patients and family/caregivers including, but not limited to:
  - i. The Journey Program
  - ii. My Care Central
  - iii. Music and Medication Therapy
  - iv. Message and Aromatherapy
  - v. Pet Therapy
  - vi. Residential Hospice Foundation

Any such free programs and services will be furnished in accordance with Florida Hospice's compliance program, policies and procedures, applicable state and federal law and related guidance.

18. Florida Hospice will partner with the We Honor Veterans Program and work cooperatively with West Palm Beach VA Medical Center to coordinate hospice services and enhance the care Veterans receive while facing serious illness.
19. Florida Hospice will provide internship opportunities to qualified students in medical, nursing, gerontology, social work, music therapy, and religious and pastoral counseling training programs with the Hospice Service Area.

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)**, also referenced as MorseLife or the applicant, is a not-for-profit hospice provider in Palm Beach County, Florida (SA 9C). Controlling interest for MorseLife Hospice Institute, Inc. rests with MorseLife Health System, Inc. MorseLife Hospice Institute, Inc.'s current Agency-issued hospice license (Lic. #50370983 effective 5/19/21 - 5/18/23) reads, in part, "Pursuant to 408.036(3)(a), Florida Statutes, services can only be provided to patients residing in the communities located within the not-for-profit retirement community, including home and community-based service providers."

The applicant expects issuance of license and initiation of service in April 2022.



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The applicant proposes \$470,900 in total project costs, which include equipment, project development and start-up costs.

Pursuant to project approval, MorseLife offers the following Schedule C conditions:

The following conditions improve access to quality hospice services that benefit populations with unmet needs:

1. MorseLife Hospice Institute will establish a physical presence in Belle Glade to ensure access to hospice care and provide additional outreach to western communities.
2. MorseLife Hospice Institute will cover the cost of assisted living services on the MorseLife campus, allocating 2 units/beds for hospice patients without caregivers or ability to pay for assisted living. The monitoring report includes the number of patients and days for which assisted living is provided by the hospice program at no cost to the patient.
3. MorseLife Hospice Institute will offer its Palliative Care Program to residents of Hospice Service Area 9C to improve the quality of life for individuals with a chronic, serious, or life-threatening disease. The annual, required monitoring report identifies the number of patients served by the palliative care team.
4. MorseLife Hospice Institute will offer its Rest Assured Program to residents of Hospice Service Area 9C to provide companionship to those at the end of life with the goal to ensure that no one dies alone. The annual, required monitoring report identifies the number of patients without a caregiver that received companionship services.
5. MorseLife Hospice Institute will provide transportation services related to clinical care to Hospice and Palliative care clients as needed at no additional cost to the hospice or patient/resident. *This is especially beneficial to hospice residents of advanced age and low income residents of the Glades Area where access to health services is more difficult due to limited public transportation services.* The monitoring report identifies the number of trips provided.
6. MorseLife Hospice Institute will continue participation in the We Honor Veterans program, advancing to Level 5 by the second year of hospice program expansion.

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7. MorseLife Hospice Institute will provide cultural sensitivity training to all its hospice and palliative care employees. The monitoring report identifies the number of employees receiving such training.
8. MorseLife Hospice Institute will become Services and Advocacy for Gay Elders (SAGE) Platinum Certified by the end of its first year of expansion into Hospice Service Area 9C.
9. MorseLife Hospice Institute commits to serving patients with HIV/AIDS. The annual monitoring report includes the number of individuals with a diagnosis of HIV/AIDS and days of care for which hospice or palliative care is provided.
10. MorseLife Hospice Institute will provide end of life care in the spirit of Jewish traditions for those of the Jewish faith.
11. MorseLife Hospice Institute will employ or contract with a Rabbi, Priest and non-denominational Christian Pastor to ensure access to appropriate faith-based services and bereavement care.
12. MorseLife Hospice Institute will employ bilingual staff. The annual monitoring report identifies the number of staff employed and languages other than English.

The following conditions assure access to services not specifically covered by private insurance, Medicaid, or Medicare, but improve quality of care:

13. MorseLife Hospice Institute commits to provide Art Therapy (Art Without Boundaries). The annual monitoring report includes the number of individuals that received Art Therapy within the hospice program.
14. MorseLife Hospice Institute commits to provide access to Cannabis-Based Therapy. The annual monitoring report includes the number of individuals that received Cannabis-Based Therapy within the hospice program.
15. MorseLife Hospice Institute commits to provide Legacy Projects. The annual monitoring report includes the number of Legacy Projects completed for hospice families.

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16. MorseLife Hospice Institute commits to provide Massage Therapy. The annual monitoring report includes the number of individuals that received Massage Therapy within the hospice program.
17. MorseLife Hospice Institute commits to provide Music Therapy (Music and Memory). The annual monitoring report includes the number of individuals that received Music Therapy within the hospice program.
18. MorseLife Hospice Institute commits to provide Pet Therapy. The annual monitoring report includes the number of individuals that received Pet Therapy within the hospice program.
19. MorseLife Hospice Institute commits to provide Reiki Therapy (Alternative Healing Therapy). The annual monitoring report includes the number of individuals that received Reiki Therapy within the hospice program.
20. MorseLife Hospice Institute commits to provide Virtual Reality (VR) experiences. The annual monitoring report includes the number of individuals that received VR experiences within the hospice program.

The following conditions expand research and educational opportunities to increase the number of qualified hospice and palliative care workers:

21. MorseLife Hospice Institute will provide continuing education units (CEU's) on an ongoing basis. The annual monitoring report identifies the date each course is offered and the topic covered.
22. MorseLife Hospice Institute will provide training opportunities for the following positions:
  - Nurses
  - Social Workers
  - Chaplains
  - Nutritionists

The annual monitoring report includes the number of interns by program of study that received training within the hospice program.

The following benefits are precluded as conditional requirements of the CON due to licensing and accreditation requirements involving other organizations. However, MorseLife Hospice Institute is committed to achieving the following benchmarks:

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1. MorseLife Hospice Institute will submit its license application to amend its service area to include Hospice Service Area 9C, Palm Beach County, within 10 days of receipt of a valid CON.
2. MorseLife Hospice Institute will seek to maintain standards of excellence through accreditation with the Community Health Accreditation Partner (CHAP) organization. The annual monitoring report includes a copy of the current accreditation certificate or letter.
3. With expansion of the hospice program, MorseLife Hospice Institute will expand the Geriatric Fellow program (of the Joseph L. Morse Health Center, Inc.'s Teaching Nursing Home) to introduce a hospice rotation to the curriculum. (Subject to the Joseph L. Morse Health Center, Inc. maintaining its teaching nursing home status).

**Odyssey Healthcare of Marion County, LLC (CON application #10703)**, also referenced as Odyssey or the applicant, is a for-profit Florida entity, affiliated with the Kindred at Home Hospice Division, which is the owner/licensee and holds controlling interest in Florida d/b/a as 'Kindred Hospice' in SAs 3B, 4B, 7B, and 11, Emerald Coast Hospice in SAs 1 and 2 and Regency Hospice of Northwest Florida in SA 1. In summary, The Kindred at Home Hospice Division has hospice programs in the SAs 1, 2A, 3B, 4B, 7B, and 11.

Kindred at Home Hospice Division is stated to operate 382 hospice agencies/sites, located in 35 states. In this batching cycle, Odyssey Healthcare of Marion County, LLC also proposes to establish a new hospice program in SA 6B.

The applicant expects issuance of license on December 31, 2022 and initiation of service on January 1, 2023.

The applicant proposes \$612,378 in total project costs, which include equipment, project development and start-up costs.

Pursuant to project approval, Odyssey offers the following Schedule C conditions:

**Community-Specific Programming and Resources**

**Condition 1:** Odyssey Healthcare commits to hiring a full-time bilingual (English and Spanish speaking) social worker to help develop advanced care planning and education and increase access to care to

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diverse populations. Odyssey Healthcare further commits to hiring workforces reflective of the communities in which they serve and providing translated forms and literature as needed.

### **Accreditation**

**Condition 2:** Odyssey Healthcare commits to achieve accreditation by the Accreditation Commission for Health Care (ACHC) within the 2nd year of commencement of operations.

### **Community-Specific Programming and Resources**

**Condition 3:** Odyssey Healthcare commits to implement an educational outreach program to better serve the Hispanic, African American, and other underserved population groups identified by the program personnel in conjunction with community leaders. This will include a mobile hospice education team which will travel as appropriate to many of the following: community centers, health care facilities, churches, ALF meetings to provide hospice outreach and education. The outreach program will provide pamphlets, brochures, and firsthand information about hospice services. The applicant is committing \$100,000 to this program in the first two years of operations as funding and needed going forward.

### **Disease-Specific programming and resources**

**Condition 4:** Odyssey Healthcare commits to the development/use of certain specialty care programs. The Odyssey Specialty Care programs were developed with Dr. Ronald Crossno, MD Chief Medical Officer and National Medical Director for Odyssey and has worked in hospice for more than 20 years. Dr. Crossno is credentialed by the Hospice Medical Director Certification Board as a Certified Hospice Medical Director, is a Fellow with the American Academy of Hospice and Palliative Medicare, received the Lifetime Achievement award from the AAHPM in 2020 for his body of work that has contributed to the advancement of Hospice and Palliative Care, and as an active Board Member of the National Hospice and Palliative Care Organization.

**Cardiopulmonary Specialty Care Program:** Cardiac and respiratory disease are in the top three reasons for the death and Service Area 9C and indicate a need for the hospice provider to have a focused care program for those patients facing end of life with these chronic illnesses. The program represents specialty cardiac and respiratory end of life care education for all staff at the hospice program, focused care planning for those symptoms specific to these disease processes to provide the patient and family the tools, medications, treatments and support needed to meet their end-of-life goals.

**Alzheimer's Disease/Dementia:** Alzheimer's/Dementia is in the top four reasons for death in Service Area 9C. Odyssey has a program of specialized education for the hospice team and an educational booklet for patient families and caregivers used by the hospice team to provide guided education and training for the family.

**Skin Health Program:** The Integumentary System, a.k.a. the skin, is the largest organ of the human body and requires close observation and interventions during end of life and as a part of every hospice patients care plan. Odyssey has partnered with MedLine as a national medical supply vendor and an engaged collaborator to bring a best-in-class holistic approach to skin care supported with a Wound Ostomy and Continence Nurses educational program for staff, patients, families and advanced skin care/wound care and treatment products.

**Soul injury®:** Odyssey Hospice recognizes that the patient and family who interacts with our agencies may have a past traumatic experience. These past traumatic experiences may or may not be known to us and these past experiences can create obstacles for EOL care. A short risk assessment is conducted for each hospice patient to establish a plan of care to address any feelings that are causing them to feel disconnected from their sense of self, with the goal of assisting the patient and family to overcome any obstacles that would prevent them from meeting their end-of-life goals.

**Senior Living Standards Program:** Kindred at Home's Senior Living Service Standards ensure exemplary customer service and communication standards when caring for residents of assisted living and skilled communities.

**Electronic Medical Records**

**Condition 5:** Odyssey Healthcare commits to Odyssey Healthcare commits to the implementation of Homecare Homebase electronic medical records (or equivalent) system at start-up, including the use of mobile point-of-care devices.

**Population group-specific programming and resources**

**Condition 6:** Odyssey Healthcare commits to offering We Honor Veterans, a specialized hospice program developed to honor Veterans by providing a hospice care program that recognizes and responds to the unique needs of the of the Veteran and his/her family. This commitment includes the establishment of Level Four within a reasonable timeframe.

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We Honor Veterans integrates all of the holistic and specialized pieces of hospice care, like pain and symptom management, with special services designed just for veterans. Veterans are identified at the time of admission and their military service/needs are integrated into the POC. All Veterans in the We Honor Veterans Program receive special recognition of service, pinning; “Welcome Home” of Vietnam Veterans, visits from volunteers who are also Veterans; and guidance with military benefits, records recovery and burial arrangements if they choose to do so.

Odyssey Healthcare Hospice’s hospice team members are end-of-life experts who have received additional education and training on identifying, assessing and meeting the unique needs of Veterans and their family from the time of referral through bereavement services. Odyssey Healthcare employees attend We Honor Veteran training and all participate in the care of the patient.

The We Honor Veterans Program enables a Veteran, and his/her family to make informed decisions, and participate in care planning when facing a life limiting illness. By gaining knowledge and expert support from Odyssey Healthcare Hospice’s team, the Veteran and his/her family are better positioned to live each day to its fullest. The components of the We Honor Veterans program include:

- VA focused admissions process, including specific Veteran admission information packet;
- Veterans who receive care from the Odyssey Healthcare enter a new level of care that is unique among pharmacological aspects of palliative (comfort) care provided. Veterans are introduced to special programs and partners. Among the programs and care partners that Veterans and their families may also have access to include;
  - 24-hour Nursing Support;
  - Tree of life (a unique awareness program);
  - Effleurage (light touch massage);
  - Bereavement Support;
  - Flower Ministry;
  - The Final Salute program (a final act of dignity and respect as deceased veteran leaves home under the American Flag for which they dedicated their service.

Further evidence of this commitment to serve the needs of Veterans, Odyssey Healthcare has conditioned its CON application on committing to the development of its We Honor Veterans Program for Veterans upon initiation of the hospice program in Service Area 9C.

**Other - Vigil Volunteer Program**

**Condition 7:** Odyssey Healthcare will commit to expansion of Odyssey Healthcare's Vigil Volunteer Program into the service area, equipped with a team of specifically trained volunteers available to respond on short notice to provide presence during the last few hours of life to patients without family support or patients and families who need additional support. Vigil volunteers also provide support to family members who need a break from the bedside of their loved ones during the dying process.

**Other - Internships**

**Condition 8:** Odyssey Healthcare will commit to offering of internship experiences for positions such as social workers, bereavement counselors, chaplains, nursing students and medical students to help increase the pool of qualified health professionals who can serve Hospice patients. We will seek contracts with local universities, colleges and technical schools as Odyssey Healthcare has done in other markets.

**Other - Fundraising**

**Condition 9:** Odyssey Healthcare will commit to forgo fundraising solicitations as long as it serves service area residents. This will lessen the impact on existing service per area providers. Should patients and families who have benefitted from the care provided by Odyssey wish to make donations, they will be directed to other charitable organizations located within the service area.

**Other - Specific Programming and Resources**

**Condition 10:** Odyssey Healthcare will commit to the recruitment of bilingual volunteers. Patients' demographic information, including other languages spoken, is collected so that the most compatible volunteer can be assigned to fill each patient's visiting request.

**Other - Alternative Therapies**

**Condition 11:** Odyssey Healthcare will commit to the provision of alternative therapies beyond the core hospice benefit, such as massage therapy, pet therapy, music therapy, art, or other such alternative therapies when eligible and needed.

**Other - Tuition reimbursement**

**Condition 12:** Odyssey Healthcare commits to provide up to \$2,500 per employee and up to \$20,000 annually for tuition reimbursement for employees to continue education in hospice or end-of-life care. This includes tuition reimbursement for Odyssey Healthcare staff to obtain



Hospice Certification, further enhancing the quality of care for hospice patients/residents, as well as supporting staff ability to advance professionally.

**Population group-specific programming and resources**

**Condition 13:** Odyssey to providing hospice care for the low-income and homeless populations in the service area. Odyssey provides hospice care to all individuals requiring hospice care regardless of ability to pay. Odyssey does and will continue to meet these licensure standards.

Hospice care for the homeless population comes is often challenged due to many homeless individuals living outside shelters or non-permanent housing. With its existing community relationships and, Odyssey Healthcare is well-positioned to overcome these challenges to provide best-in-class end-of-life care. Our clinical and business developments team work seamlessly to coordinate with the local homeless support organizations, identified below, to provide education and engage with the plans and goals of the organizations, to meet the end-of-life care needs of this vulnerable an underserved population

Local Homeless Support Organizations:

- <https://homelesscoalitionpbc.org/>

Through engagement with local homeless support organizations, Odyssey Healthcare commits to provide orientation and education to its hospice staff.

**Population group-specific programming and resources – Care for persons with HIV/AIDS**

**Condition 14:** Odyssey Healthcare will commit to offering care to persons with HIV/AIDS. Hospice care for the HIV/AIDS population comes with many challenges the Odyssey Healthcare is well-positioned and commits to overcome these challenges to provide best-in-class end-of-life care. Our clinical and business developments team work seamlessly to coordinate with the local support organizations, and local departments of health to provide education and engage with the plans and goals of the organizations to meet the end-of-life care needs of this vulnerable an underserved population. These organizations will include the county health departments and the Palm Beach County HIV Care Council

<https://discover.pbcgov.org/carecouncil/Pages/default.aspx>).

**Early hospice access to palliative care**

**Condition 15:** Odyssey to commit to providing a palliative care program (“early hospice access program”) to persons who are still receiving

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complex medical care or who are still evaluating care options, providing early access to palliative care and hospice support. In general, to qualify for hospice care, a hospice doctor and your doctor (if you have one) must certify a patient is terminally ill, meaning they have a life expectancy of 6 months or less. In some situations, early initiation of palliative care, in addition to more complex treatments, provides patients and their caregivers, additional support/resources from Odyssey's hospice service, which is coordinated with the patient, their family and the patient's physician. Odyssey's specially trained palliative care team includes physician medical director; nurse practitioner; palliative care coordinator; social worker; and spiritual care coordinator, as needed.

The applicant includes footnotes describing palliative care which were not included in the above. The Agency notes that pursuant to the United States Department of Justice website <https://www.justice.gov/usao-mdtn/pr/united-states-and-tennessee-file-suit-against-curo-health-services-and-related-entities>, on June 1, 2021, the United States and Tennessee filed a consolidated complaint in intervention alleging violations of the False Claims Act and the Tennessee Medicaid False Claims Act by Curo Health Services Holdings, Inc., Curo Health Services, LLC, TNMO Healthcare, LLC (d/b/a Avalon Hospice), and Regency Healthcare Group, LLC, announced Acting U.S. Attorney Mary Jane Stewart for the Middle District of Tennessee and Tennessee Attorney General Herbert Slatery III. The complaint also states common law claims, including unjust enrichment and payment under mistake of fact.

**ProMedica Hospice of Palm Beach County FL, LLC (CON application #10704)**, also referenced as ProMedica Palm Beach or the applicant, is a not-for-profit development stage Florida entity. ProMedica Palm Beach is a subsidiary of ProMedica Health Systems and Subsidiaries (the Systems), established in 1986 and located on Toledo, Ohio, which operates in 28 states as well as providing healthcare consultative services in China. ProMedica Health Systems and Subsidiaries, through its Florida affiliates, owns/operates hospice programs in SAs 4A (Heartland Home Health Care and Hospice), 10 and 11 (Heartland Hospice Services). These entities changed their names to ProMedica Hospice (Jacksonville) and ProMedica Hospice (Broward) effective September 28 and 21, 2021.

In this batching cycle, The Systems also proposes to establish a new hospice program in SA 3B.

The applicant expects issuance of license and initiation of service to occur in January 2023.

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Total project cost is \$348,325, which include equipment, project development and start-up costs. The reviewer notes that this is the same total project cost for its 3B project (CON application #10704).

The reviewer only includes the applicant's proposed 'compliance' measure when it adds to the substance of the proposed condition. Pursuant to project approval, ProMedica Hospice of Palm Beach County FL LLC offers the following Schedule C conditions:

1. ProMedica Hospice of Palm Beach County, FL LLC commits to provide a minimum of one educational seminar per quarter focusing on end-of-life issues for professionals who work with end-of-life patients (such as physicians, nurses, religious leaders, etc.). ProMedica Hospice of Palm Beach County, FL, LLC will commit a minimum of \$75,000 within the first two years of operation for this effort. ProMedica Hospice of Palm Beach County, FL, LLC will provide a listing of educational materials regarding end-of-life issues at these seminars. Compliance with this condition will be documented by annually providing to the Agency a list of seminars conducted and the dates the seminars are offered.
2. ProMedica Hospice of Palm Beach County, FL, LLC commits to establish a patient/family "Special Needs Fund" of \$10,000 for each of the first five years of operation (i.e., \$50,000) of the Service Area 9C to be used by the clinical team members to meet unusual and uncovered patient, family, and employee needs. Examples include medical transportation, private duty caregivers, housing, meals, burial funds, music/pet therapist and massage/other alternative therapies.
3. ProMedica Hospice of Palm Beach County, FL, LLC commits, for at least the first five years of operation, to a minimum annual budget of \$10,000 per year for the provision of a special wish fund for hospice patients and families in Service Area 9C.
4. ProMedica Hospice of Palm Beach County, FL, LLC commits to provide up to \$10,000 annually for tuition reimbursement for employees to continue education in hospice or end-of-life care. This includes tuition reimbursement for ProMedica Hospice staff to obtain Certified Hospice Palliative Nurse certification, further enhancing the quality of care for hospice residents, as well as supporting staff ability to advance professionally. There will also be an emphasis on promoting tuition reimbursement for the advancement of Hispanic staff.

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5. ProMedica Hospice of Palm Beach County, FL, LLC commits to implement a volunteer program within the first two years of operation that focuses on groups who traditionally have not been significantly involved in hospice programs such as teens, ethnic, and racial minorities. Included in the project will be issues of transportation, Wellness Management, Management of Medications, and food needs. This program is known as Social Determinants of Health and ProMedica commits \$100,000 over this two-year period in development this program in Service Area 9C, Palm Beach County. Our initial focus will be in the Belle Glades area, an underserved market, and our primary interest will be in serving African Americans. See Attachment 9 for more details.
6. The ProMedica Palm Beach County Senior Care Providers (seven Nursing Homes, two Assisted Livings, and Broward Hospice) are having discussions with the Health Care District of Palm Beach County to work together to bring the Social Determinants of Health programing to Palm Beach County and the underserved Belle Glades area. We are committed to continue having discussions with the Health Care District of Palm Beach County to jointly bring needed services to the underserved areas and underserved groups.
7. ProMedica Hospice of Palm Beach County, FL, LLC commits to the development and implementation of programs focused on improving access to hospice services by Hispanics (and the subgroups within), Haitians, and persons of Jewish heritage in Service Area 9C. The programs will include training on cultural differences and competencies and flexible programming to meet their unique needs. Special community education efforts, clinical care protocols, and bereavement services for families will be implemented to increase participation in hospice for groups traditionally underrepresented. Programs for other cultural groups will be developed as the needs are identified in the community.
8. ProMedica Hospice of Palm Beach County, FL, LLC commits to employ bilingual, Spanish-speaking staff, Haitian-speaking staff, and Kreyol (Creole) and to provide translated forms and literature.

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9. ProMedica Hospice of Palm Beach County, FL, LLC commits to provide specialized training for staff working with individuals with Alzheimer's disease to enhance the provision of hospice care to such individuals. Compliance with this condition will be documented by annually providing AHCA with a list of training dates to document that the training has taken place.
10. ProMedica Hospice of Palm Beach County, FL, LLC commits to address the specific needs of patients who have HIV/AIDS/COVID and include information in clinical training programs to meet this identified community need. ProMedica Hospice of Palm Beach County, Fl, LLC will ensure that the community is made aware of our acceptance of patients with HIV/AIDS/COVID through our community outreach and education programs. Staff will receive specialized training to enhance the hospice care provided to such individuals. Compliance with this condition will be documented by annually providing AHCA with a list of training dates to documents that the training has taken place.
11. ProMedica Hospice of Palm Beach County, FL, LLC commits to seek accreditation with the National Institute for Jewish Hospice within two years of opening to better serve Jewish residents of Palm Beach County.
12. ProMedica Hospice of Palm Beach County, FL, LLC commits to include representatives from the Hispanic and Jewish communities on its Community Advisory Board (CAB) in Service Area 9C. The CAB will be a volunteer advisory group created to more fully address community issues and will inform ProMedica Hospice of issues regarding hospice and end-of-life care viewed from the perspective of area residents and businesses (especially within the Hispanic and Jewish communities), conduct information sessions as deemed appropriate for the purposes of soliciting further community perspective and technical expertise, and communicate to other members of the community planned programs and services to address service gaps and access issues.
13. ProMedica Hospice of Palm Beach County, FL, LLC commits to developing a Vigil Volunteer program in Service Area 9C, to ensure that patients do not die alone. Vigil Volunteers are also available to give support to family members who need a break from the bedside of their loved ones during the dying process.

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14. ProMedica Hospice of Palm Beach County, FL, LLC commits to apply for accreditation by the Accreditation Commission for Health Care (ACHC) program within the first year of opening the proposed office in Service Area 9C.
15. ProMedica Hospice of Palm Beach County, FL, LLC commits to contract for 1.0 FTE physician specializing in palliative care, in addition to the medical director, to offer palliative care consults for patients served by ProMedica Hospice of Palm Beach County, Fl, LLC as well as to hospitals, nursing homes, and other care settings in the community in the fiscal year following ProMedica Hospice of Palm Beach County reaching an average daily census of at least 100 patients.
16. ProMedica Hospice of Palm Beach County, FL, LLC commits to conduct semi-annual meetings with all contracted hospitals and long-term care facilities to review quality of service and responsiveness. ProMedica Hospice of Palm Beach County, FL, LLC will establish a written policy in Service Area 9C to this effect.
17. ProMedica Hospice of Palm Beach County, FL, LLC commits to create and implement a public education program about the benefits of hospice care in Palm Beach County. The goal of this program is to raise awareness and understanding of patients and families regarding hospice care as an end-of-life option.
18. ProMedica Hospice of Palm Beach County, FL, LLC commits to provide 24 hour, 7 days a week, telephone response provided directly by ProMedica Hospice staff. ProMedica Hospice of Palm Beach County, Fl, LLC also commits to provide 24 hour, 7 days a week interpretive services, either by ProMedica Hospice of Palm Beach County staff or through a contracted interpretive service.
19. ProMedica Hospice of Palm Beach County, FL, LLC commits to develop, in Year Two, a children's and family retreat program(s) to serve the residents of Service Area 9C, Palm Beach County. These programs will augment traditional bereavement services especially for children experiencing grief or loss. Such programs have been implemented by ProMedica, the applicant's parent company, in Pennsylvania, Michigan, Missouri, North Carolina, and Georgia.

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20. ProMedica Hospice of Palm Beach County, FL, LLC commits that a pain assessment will be completed on all patients at the time of admission, as part of an ongoing pain management program focused on reducing pain to targeted goals within the first 48 hours of admission.
21. ProMedica Hospice of Palm Beach County, FL, LLC commits to developing a Palliative Care Program within Palm Beach County in the first two years of operation.

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)**, also referenced as PruittHealth or the applicant, is a for-profit development stage Florida entity and an affiliate of PruittHealth, Inc. PruittHealth, Inc. currently provides administrative-related services to all its affiliated health care providers in Florida, Georgia, North Carolina and South Carolina and proposes to provide all the administrative-related responsibilities for the proposed project. PruittHealth Hospice has been providing end-of-life services since 1993 and operates a total of 25 hospice programs in Georgia, South Carolina and North Carolina.

The ultimate parent company is United Health Services, Inc. (United or the parent). United does not currently provide hospice services in Florida. PruittHealth, Inc., also proposes to establish a new hospice program in SAs 1, 3B and 6B.

The applicant expects issuance of license and initiation of service to occur on January 1, 2023.

The applicant proposes \$270,320 in total project costs, which include equipment, project development and start-up costs.

Pursuant to project approval, PruittHealth Hospice – Southeast Florida, LLC offers the following Schedule C conditions:

Reflective of its commitment to serve all terminally ill residents of Subdistrict 9C, the Applicant is willing to accept any such conditions on its Certificate of Need based on any representations made throughout this document. The Applicant will provide all required core components of hospice care set forth by Medicare Conditions of Participation as well as Florida hospice licensure requirements including the provision of all four levels of service (routine, continuous care, general inpatient and respite) to all types of patients without regard to race, ethnicity, gender, age, religious affiliation, diagnosis, financial status, insurance status or any other discriminating factor.

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The Applicant will provide terminally ill Subdistrict 9C residents with a proficient quality hospice provider dedicated to meeting the needs of the community. It will enhance the availability, accessibility, and quality of hospice programming provided to Subdistrict 9C residents, while dually reducing readmissions to area hospital. As demonstrated throughout this Certificate of Need application, the Applicant will meet the AHCA published need as well as the need identified by the market research for this Certificate of Need application.

Specific conditions to be met by the Applicant, if awarded a Certificate of Need to provide hospice services to Subdistrict 9C residents, are highlighted on the following pages under the following seven categories:

- General Hospice Conditions
- Hospice Programming
- Programs and Services Beyond Medicare Requirements
- Recruit, Train, and Retain High-Quality Staff
- Community Outreach
- Emergency Preparedness
- Financial

### **General Hospice Conditions**

#### **Hospice Operations**

- The Applicant conditions this application on initiating operations no later than January 2023.
- The Applicant conditions this application on not discriminating against anyone based on race, sex, religion, national origin, physical handicap, or diagnosis, payment source, and/or any other circumstance or physical condition which classify the individual as underserved.
- The Applicant conditions this application on implementing company-wide COVID-19 resources and initiatives immediately following licensure and maintain them through the end of the COVID-19 pandemic.
- The Applicant conditions this application on implementing the PruittHealth Hospice 35 Best Practices.
- The Applicant conditions this application on obtaining Joint Commission withing (within)12 months of licensure.
- The Applicant conditions this application on participating in a company-wide Annual Quality Report to demonstrate transparency in operations and make this Quality Report available to the public.
- The Applicant conditions this application on incorporating PruittHealth Hospice's QAPI Plan.



**Inpatient Hospice Services**

- The Applicant conditions this application on entering into a “scatter bed” agreement with local inpatient bed providers (hospitals and skilled nursing facilities) to serve both inpatient respite and general inpatient patients.

**Hospice Programming**

**Disease Specific Programming**

- The Applicant conditions this application on offering disease specific programs.

**Respiratory Therapy Program**

- The Applicant conditions this application on offering Respiratory Therapy services by a licensed Respiratory Therapist.

**Peaceful Path Program**

- The Applicant conditions this application on offering the Peaceful Path program.

**Palliative Care Program**

- The Applicant conditions this application on offering its Palliative Care program and dedicated palliative care staff to ensure (sp. ensure) the success and viability of the program.
- The Applicant conditions this application on providing an annual education event for area healthcare practitioners. The event will provide information on palliative care including the palliative care services offered, how to identify patients who would benefit from palliative care, and how to approach the subject with patients.

**On-Call Nurse Visit**

- The Applicant conditions this application on having an on-call nurse available to visit a patient or family within an hour of receiving a call if the family needs a visit.

**11th Hour Vigil Program**

- The Applicant conditions this application on offering its 11th Hour Vigil program.

**Programming and Services Beyond Medicare Requirements**

**We Honor Veterans**

- The Applicant conditions this application on being a member of We Honor Veterans, in good standing, and obtaining National Hospice and Palliative Care Organization Level IV within 12 months of operation.

**Camp Cocoon**

- The Applicant conditions this application on PruittCares Foundation funding \$40,000 annually to establish and host Camp Cocoon in Subdistrict 9C for up to 100 children on an annual basis.

PruittCares Foundation Funding: Year 1-\$40,000 Year 2-\$40,000

**Companion Care**

- The Applicant conditions this application on providing up to 4 hours of Companion Care for patients and their caregivers per week.

**Concierge Program**

- The Applicant conditions this application on developing a Concierge Program.

**Second Wind Dreams**

- The Applicant conditions this application on partnering with the Second Wind Dreams Program to continue efforts in realizing past dreams for its patients.

**Keepsakes for Loved Ones**

- The Applicant conditions this application on offering its patients the opportunity to create keepsakes for their loved ones, such as memorial books and chests with meaningful mementos. The keepsakes will be funded through PruittCares Foundation and patients and families will incur no expense for them.

PruittCares Foundation Funding: Year 1-\$2,500 Year 2-\$2,500

**Recruit, Train, and Retain High-Quality Staff**

**Certified Nursing Assistant Career Ladder Program**

- The Applicant conditions this application on offering its Certified Nursing Assistant career ladder program.

**Free Continuing Education Programs**

- The Applicant conditions this application on offering its customized online learning system, Pruitt University.

**Resident and Intern Opportunities**

- The Applicant conditions this application on offering medical and clinical residency and internship opportunities to medical, nursing, pharmacy, social work, bereavement counselor, therapy or other students.

**Annual Staff Training from PruittHealth Registered Dietician**

- The Applicant conditions this application on having a Registered Dietician provide annual training to all hospice partners. The training will cover ethical concerns over nutrition at end of life, common questions and concerns from dying patients and their families, and how each member of the interdisciplinary team can address them.

**Educational Grant**

- The Applicant conditions this application on the PruittCares Foundation establishing a scholarship totaling \$50,000 (\$25,000 annually or \$12,500 per student per year) for two years at the Palm Beach State College's Nursing Program to cover tuition and fees.

PruittCares Foundation Funding: Year 1-\$25,000 Year 2-\$25,000

**Community Outreach**

**Senior Living Community Outreach**

- The Applicant conditions this application on having at least 0.5 FTE community relations representative dedicated to senior living communities for the first three years of operations. The community relations representative will present educational events to senior living community residents, and meet with residents, administrators, and leadership to gain feedback on to best serve the residents.

**Applicant Commitment to being a Healthful Community Partner**

- The Applicant conditions this application on the PruittCares Foundation funding \$10,000 in each of the first two years of operations to Palm Beach County Food Bank for the purpose of providing healthy meals to individuals in need of food assistance.

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PruittCares Foundation Funding: Year 1-\$10,000 Year 2-\$10,000  
Year 3-\$10,000

### **Committed to Caring Campaign**

- The Applicant conditions this application on PruittHealth's Committed to Caring Campaign and in doing so will host free health screenings, including blood pressure, diabetes, and hearing tests, and educational sessions.

### **Emergency Preparedness**

#### **CERT Training**

- The Applicant conditions this application on having its local employees receive CERT training within the first year of operations. Staff members will not have to use vacation days to attend these trainings and will also receive their standard hourly rate for taking the two hour pre-requisite Federal Emergency Management Agency online training. The applicant will pay for the cost of any equipment required for CERT training.
- The Applicant conditions this application on the funding of \$2,500 in each of the first two years of operations to a local CERT training program.

Applicant Funding: Year 1 - \$2,500 Year 2 - \$2,500

### **Financial Assistance to Patients and Families**

- The Applicant conditions this application on the PruittCares Foundation donating \$10,000 in each of the first two years of operations to provide disaster relief for those were affected adversely by a severe weather event. This donation will be used by an accredited charitable organization and will be held for future use should it not be needed in either of the first two project years.

PruittCares Foundation Funding: Year 1-\$10,000 Year 2-\$10,000

### **COVID-19 Vaccine Compliance**

- The Applicant conditions this application on all of the Applicant's staff being fully vaccinated against the COVID-19 virus and any future pandemic causing virus or communicable disease.

### **Emergency Operations Center**

- The Applicant conditions this application on the PruittCares Foundation funding \$5,000 in each of the first two years of operations for activation of an emergency operations center due to hurricane or other natural disaster or ongoing or future

## **CON Action Numbers: 10698 through 10708**

pandemic. These funds may be used for communications and evacuation transportation during or after a storm. Any funds not used during a year will be carried forward for use in a future year.

PruittCares Foundation Funding: Year 1-\$5,000 Year 2-\$5,000

### **Highly Communicable Virus or Disease Plan**

- The Applicant conditions this application on serving all patients who have contracted a highly communicable virus or disease (such as COVID-19) with no hesitation or delay.
- The Applicant conditions this application on providing care for any clinically appropriate patient in their home, even if a household member is positive for a highly communicable virus or disease.
- The Applicant conditions this application on commencing the plan of care immediately after assessment, not mandating a quarantine period before initiating the prescribed treatments as other home health providers require.
- The Applicant conditions this application on implementing and using various technologies, including iPads, to provide virtual visits for home health patients who do not want outsiders entering their homes for fear of contracting a highly communicable disease, such as COVID-19. Virtual visits have proven to be extremely useful in maintaining a plan of care even without physical visits from care providers and are not currently available in the market. It is the Applicant's belief that this initiative will go a long way to mitigating any potential spread of a virus or disease.
- The Applicant conditions this application on maintaining a user-friendly dashboard so that patients and family members will be cognizant of statistics from the regional level down to the local provider.
- The Applicant conditions this application on continuing to utilize and adhere to its own set of stringent protocols and standards, in line CDC recommendations, and designed specifically to treat individuals with highly communicable viruses and diseases.
- The Applicant conditions this application on maintaining its ongoing training procedures for staff to ensure that all staff are kept up to date with rapidly evolving requirements and best practices.

**Financial**

**Non-Solicitation of Donations**

- The Applicant conditions this application on not soliciting charitable contributions from patients, families, or friends relating to its services or engaging in fundraising events for its program. Any unsolicited donations will be given to the PruittCares Foundation.

PruittHealth includes a letter from Dave Lescalleet, Executive Director of the PruittCares Foundation, which indicates the funding for Camp Cocoon and keepsakes for the family members are ongoing commitments and the food bank funding is for two years, which are somewhat not clearly stated in the proposed conditions. Mr. Lescalleet's letter addresses all financial conditions with the exception of the Educational Grant to Palm Beach State College's Nursing Program. The applicant also included suggested condition measures that are not included here.

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)**, also referenced as Seasons Palm Beach or the applicant, is a development stage for-profit Florida entity. Seasons Palm Beach is directly owned by AccentCare, Inc., whose ultimate parent is Horizon Acquisition Co. Inc., which is funding the project.

AccentCare/Seasons has licensed hospices in Arizona, California, Colorado, Connecticut, Delaware, Florida, Georgia, Illinois, Indiana, Massachusetts, Maryland, Michigan, Mississippi, Missouri, New Jersey, Nevada, Oregon, Pennsylvania, Tennessee, Texas and Wisconsin.<sup>1</sup>

Seasons affiliates provide hospice services in SAs 5A, 5B, 6A, 10 and 11.

In this batching cycle, Seasons also proposes to establish a new hospice program in SA 6B.

The applicant expects issuance of license on December 2, 2022 and initiation of service on January 1, 2023.

Total project cost is \$853,781 and includes building, equipment, development, and start-up costs.

Pursuant to project approval, Seasons Hospice & Palliative Care of Palm Beach County, LLC proposes the following Schedule C conditions indicating they were developed to meet the unique needs of Palm Beach

<sup>1</sup> Source: CON application #10706, Exhibit 2.

County residents and the parent company will provide \$100,000 per year to seed these initiatives. The proposed conditions are presented below verbatim. However, we did not include references to their exhibits in the narrative and only include portions of the applicant's 'compliance documentation' when it provided additional information toward meeting the condition.

**Support for Elderly Residents Living Alone**

According to Census Data, over 30 percent of women 60 and older in Palm Beach County live alone, and 18 percent of men 60 and older live alone. Elders living alone are at high risk for depression and anxiety and may have challenges with food insecurity or financial pressures due to their social isolation. Seasons Palm Beach County will implement four programs to meet the unique needs of hospice patients living alone and the bereaved who are left alone after the death of the hospice patient.

- 1. Caregiver Relief Program** – Seasons Palm Beach conditions this application on providing relief for caregivers through its partnership with Seasons Hospice Foundation. For patients living alone or with family caregivers experiencing caregiver burnout, and who cannot afford additional custodial care on their own, they will be provided up to six hours of caregiver relief per week. This custodial care will serve several purposes, including assistance with minor household chores and reducing isolation. The custodial care will be provided by contracted services, paid for through The Seasons Hospice Foundation. Hospice patients and their caregivers can obtain this service by completing an assessment with the hospice social worker.

Conformance with this condition will be demonstrated by providing the number of patients who receive free custodial care and the average hours of custodial care provided.

- 2. Compassionate Companions** - Seasons Palm Beach will provide a volunteer-based companionship program in Subdistrict 9C. All Seasons volunteers are asked about their interests in becoming companions for hospice patients living alone. These volunteers, Compassionate Companions, will receive special training on how to provide companionship to people living alone, particularly women. Seasons Palm Beach will make every effort to match volunteers with patients based on common interests and backgrounds.

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Seasons Palm Beach will train its Compassionate Companions to detect signs of food insecurity and financial distress. As Compassionate Companions identify any additional services or needs patients may have, they will communicate these needs to Seasons Palm Beach staff, who will ensure patients' needs are met. Compassionate Companions will receive a weekly call from a Seasons Palm Beach social worker to see if any of the patients they visited have concerns or problems the social worker can address or provide resources for.

Conformance with this condition will be demonstrated by submitting the number of Compassionate Companion volunteers, copies of training materials, and the number of visits to hospice patients.

- 3. No One Dies Alone Program.** Seasons will implement its No One Dies Alone program in Palm Beach County. Seasons educates its staff and volunteers to identify when patients are approaching the final weeks of their lives. At this point, staff and volunteers offer additional support and provide continuous care or volunteer vigils, if the patient/family accept it. If the patient is not appropriate for continuous care, Seasons will offer its Volunteer Vigil program, which uses specially trained volunteers to stay at the patient's home. If volunteers are not available, Seasons Palm Beach staff will hold vigil to ensure no patient dies alone against their wishes.

Conformance with this condition will be demonstrated by submitting the percent of patients who die with a Seasons staff member or volunteer at their bedside.

- 4. Friendly Visitors Bereavement Program.** This program serves low-risk bereaved clients who are coping well with loss but are lonely and socially withdrawn or isolated. For many elderly individuals, the loss of a spouse is followed not only by grief for the death, but also increased isolation, loneliness, and changes in daily routines. This volunteer-based program offers in person support and weekly phone calls and postal correspondence.

Conformance with this condition will be demonstrated by submitting as part of the annual monitoring report the number of volunteers and the number of bereaved persons served in the Friendly Visitors Bereavement Program.



**Improving Hospice Access for Traditionally Underserved Populations**

Several areas in Palm Beach County have “concentrations of vulnerable elders”, as defined by The Department of Elder Affairs’ Elders Need Index (ENI). These populations often have cultural and linguistic barriers to receiving comprehensive end-of-life care. Seasons Hospice Palm Beach has developed targeted programming and initiatives to improve access to hospice and palliative care for these elderly residents and their caregivers.

- 5. Cultural Inclusion Council** - As discussed throughout this application, there are socioeconomic and health disparities in Subdistrict 9C that present barriers to hospice care for some patients. Seasons Palm Beach will form a Cultural Inclusion Council that meets on a quarterly basis. This council will have at least one Hispanic member, one member of the LGBTQ+ community, an individual representing the Jewish community, and one member from the African American community. Seasons Palm Beach staff members will also serve on the council, the purpose of which is to consider the cultural values of all Seasons’ patients, families, and staff, to provide care that respects what is most important to each individual, to improve the community understanding of hospice and palliative care, and to educate staff to ensure all needs are met while breaking down barriers to accessing quality hospice care. The Cultural Inclusion Council’s goals reinforce Seasons’ priority of equitable care so all patients, regardless of race, gender, ethnicity, religion, sexual orientation, language, gender identity, or class, die comfortably and with dignity.

Conformance with this condition will be demonstrated by submitting a copy of the minutes and attendees for each quarterly meeting.

- 6. Two Hospice Offices** – Seasons Palm Beach conditions this application on having two hospice offices in Subdistrict 9C. Seasons offices will be in the heart of the highest need areas, to partner with the community and help provide solutions in high ENI areas. One of those offices will be in or near Belle Glade, Florida. The other will be in Riviera Beach, Florida. As discussed on page 35 of Schedule B, both of these areas have lower hospital discharge rates than other areas in the county and are underserved for hospice care. Providers in these areas also report long response times to requests for visits from hospice staff. Both hospice offices will be open in the first year of operation.

- 7. Bilingual Staff and Outreach Programs** Palm Beach County is home to many residents whose primary language is not English. In both the eastern and western portions of the county, there are areas where more than a quarter of all residents speak a language other than English, French Creole and Spanish are the two most common other languages. Seasons understands that, to provide successful outreach and education to these residents, it is important to have staff members who can speak to them without linguistic barriers.

Seasons Palm Beach conditions this application on having a Hispanic Outreach Program with one full-time equivalent Spanish-speaking employee (either a social worker, a chaplain, a hospice care consultant, or combination thereof). Seasons also conditions this application on having a Haitian Outreach Program, with a French Creole-speaking employee (either a social worker, a chaplain, a hospice care consultant, or combination thereof).

Conformance with this condition will be shown by Seasons Palm Beach's submission of the names and positions of all staff members who speak Spanish and French Creole as part of its annual monitoring report.

- 8.** Seasons Palm Beach will become **Services and Advocacy for Gay Elders (SAGE) Platinum Certified** by the end of its first year of operations. Florida has the second highest number of same-sex couple households in the United States, and West Palm Beach was recently named the second-best city in the country for LGBTQ+ friendly retirement destinations. SAGE credentials agencies that train staff to be culturally competent in the care of LGBTQ+ seniors. None of Palm Beach County's current hospice providers are SAGE Care certified. Area residents will benefit from having a hospice provider that has received training on how to best meet the needs of LGBTQ+ patients and their loved ones.
- 9. Health Literacy Outreach** – Twenty two percent of Palm Beach County adults are at risk for having difficulty using and comprehending print materials. While some of these adults can read short texts and understand the material sufficiently to perform short tasks (like filling out a short form), others may only be able to understand very basic vocabulary in print related to familiar topics, while others are functionally illiterate.

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Seasons Palm Beach will provide community conversations, materials, and information geared toward those with low literacy, to offer education about advance directives and care options in advance and terminal illnesses. Seasons supportive staff and outreach workers will meet with community members in areas where free meals and food are offered, and in homeless shelters, churches, and other community settings to provide such education on a monthly basis.

Seasons Palm Beach will demonstrate conformance with this condition by submitting in the annual monitoring report the location, staff members, and number of participants at each monthly Health Literacy Outreach meeting.

- 10. Homeless Housing Program** – According to the 2020 Point-In-Time Count, there were 1,030 unsheltered persons experiencing homelessness in Palm Beach County, and an additional 480 persons in emergency shelters or transitional housing. 181 seniors were experiencing homelessness, 158 of whom were unsheltered. The total number of persons experiencing homelessness has been growing in Palm Beach County since 2018, and the number of homeless seniors has increased 45 percent since 2017. Palm Beach County does not have sufficient capacity to shelter all of these individuals. According to the National Coalition to End Homelessness, there were only sufficient beds for 19 percent of individuals experiencing homelessness.

Seasons Palm Beach conditions this application on providing funding to ensure homeless hospice patients are offered shelter and comfort in their final days. The parent company will provide an annual donation of \$25,000 to a local non-profit focused on meeting the needs of people at risk of or experiencing homelessness for the first five years of operations.

- 11. Food Insecurity Program** - Seasons Palm Beach conditions this application on assisting those experiencing food insecurities through two avenues. For those experiencing food insecurity, Seasons will train its Compassionate Companions and Friendly Bereavement Visitors in assessing food insecurity. The hospice social worker will also make an assessment at the time of admission and during ongoing visits. When there is food insecurity, Seasons Hospice Foundation will provide funding for emergent food needs.

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Seasons Palm Beach also recognizes the need in the larger community and conditions this application on a donation from the parent company to a local food bank or pantry in the amount of \$100,000 within the first two years of operation.

Seasons Palm Beach will demonstrate conformance with this condition by submitting a notarized statement confirming the total contribution made to local food banks and pantries. In addition, Seasons Palm Beach will submit the number of patients or bereaved clients with emergent food needs served by Seasons Hospice Foundation.

### **Serving Palm Beach County's Jewish Population**

Palm Beach County is home to a large Jewish population, some of whom have expressed their end-of-life needs are not currently being met. Seasons Hospice has experience serving Jewish patients and families in adjacent Broward County and in the Miami-Dade area. Based on its expertise, Seasons Palm Beach has developed the following conditions to serve area Jewish residents:

- 12. National Institute for Jewish Hospice** - Seasons Palm Beach conditions this application on joining the National Institute for Jewish Hospice organization in its first year of operations.
- 13. Rabbi Chaplain** – To meet the religious and cultural needs of Jewish patients and their families at the end of life, Seasons Palm Beach conditions this application on having one of its chaplains be a Jewish rabbi. Seasons Palm Beach will demonstrate conformance with this condition by submitting the name and credentials of the Jewish rabbi as part of the annual compliance report.

### **Providing Palliative and Hospice Care to Pediatric Residents and Their Families**

- 14. Partners in Care: Together for Kids** – Seasons Palm Beach conditions this application on applying to become a Partners in Care: Together for Kids (PIC/TFK) provider. There are currently no PIC:TFK providers in Palm Beach County. Through its PIC:TFK program, Seasons will use a palliative care approach to improve the quality of life for patients and family members. Seasons will offer PIC:TFK to children enrolled in the CMS Health Plan with a life-limiting or threatening illness, as certified by their physician. These services are offered to a broader range of children than

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standard hospice care, which requires a six-month terminal illness. PIC:TFK patients and their families will receive counseling, grief counseling, nursing care, pain and symptom control, music therapy, play therapy, art therapy, respite care, chaplain services, and other services.

Seasons Palm Beach will demonstrate conformance with this condition by submitting a copy of the application to become a PIC:TFK provider.

- 15.** Employ a **Certified Child Life Professional** as part of the hospice team. Child Life Professionals help infants, children, youth, and families cope with the stress and uncertainty of illness, injury and treatment. The American Association of Pediatricians states that child life specialists “promote coping and enhance the overall health care experience for patients and families” and are “associated with improved quality, outcomes and patient family experiences” in pediatric care. The child life specialist will work with the interdisciplinary team to provide evidence-based, developmentally appropriate interventions, including therapeutic play and preparation and education to reduce fear, anxiety, and pain.

Seasons Palm Beach will demonstrate conformance with this condition by submitting the name, hiring date, and credentials of Seasons Palm Beach’s child life specialist as part of its first annual monitoring report.

- 16. Kangaroo Kids** - Seasons Palm Beach will offer its Kangaroo Kids program in Subdistrict 9C. Kangaroo Kids adopts a multidisciplinary approach for serving pediatric at the end of Life, as well as their families and loved ones.

As part of this commitment, Seasons Palm Beach will ensure there is always a Registered Nurse case manager with pediatric expertise available. This means that both the day shift and the on-call or after-hours Registered Nurse case manager will have prior pediatric experience and training. In addition, one member of the supportive care team will have pediatric experience. All of Seasons Palm Beach’s clinical staff will also receive training in pediatric hospice and family support as part of their onboarding and ongoing training.

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Seasons Palm Beach will demonstrate conformance with this condition by submitting the name and credentials of the Registered Nurse case managers with pediatric expertise, as well as the names of all Seasons Palm Beach staff who have received pediatric hospice training, with the dates of their training noted.

- 17. Camp Kangaroo** - Seasons Palm Beach will offer Camp Kangaroo, a free camp experience that provides a supportive and therapeutic environment for children who have experienced the death of a family member or loved one. The camp is open to children ages 5-17 who have experienced the loss of a loved one in the last two years. Camp Kangaroo is a weekend day camp and will be on an annual basis in the Belle Glade area. Seasons Hospice Foundation will fund the annual Camp Kangaroo.

Seasons Palm Beach will demonstrate conformance with this condition by submitting an attendee list and the dates of the camp as part of its annual monitoring report.

**Increasing the Number and Quality of Area End of Life Healthcare Providers**

- 18. Offer Free CNA Training and Certification** – Florida is facing a shortage of certified nursing assistants (CNAs), which has been exacerbated by COVID-19 and is expected to continue. Through the parent company, the Applicant will offer free training and certification for CNAs. Seasons Palm Beach will recruit area residents who wish to advance their professional credentials by receiving CNA training. This will allow hospice patients to receive care from staff familiar with their community. The training will be provided free of charge to eligible Seasons Palm Beach employees.

Seasons Palm Beach will demonstrate conformance with this condition by submitting a list of all employees who receive CAN training through the program, whether they have taken the examination, and whether they have passed it, as part of the annual monitoring report.

- 19. Become a Provider for the Florida-Required Alzheimer's Education** - Seasons Palm Beach conditions this application on becoming an Alzheimer's Disease and Related Disorders (ADRD) training provider. Once approved, Seasons Palm Beach will educate all relevant employees and will offer training to Seasons Palm Beach volunteers.

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Seasons Palm Beach will demonstrate conformance with this condition by submitting a copy of the application to become a ADRD training provider.

- 20. Provide Continuing Education for Professionals** – Community healthcare professionals often struggle with identifying when patients are appropriate for a hospice referral, and they frequently ask for education on how to have these difficult conversations. Seasons Hospice and Palliative Care is accredited by ANCC and ASWB to provide continuing education in nursing and social work. Seasons Palm Beach conditions this application on offering continuing education for community healthcare professionals on a variety of topics, including “Pain and Symptom Management,” “Having Difficult Conversations,” “Understanding When to Refer to Hospice”, and “Ethnics and Cultural Needs”, among others, on a quarterly basis.

Seasons Palm Beach will demonstrate conformance with this condition by submitting the dates, titles of presentations, and numbers of attendees at each quarterly continuing education offering.

- 21. Prepare Healthcare Workers of Tomorrow** – Seasons Palm Beach conditions this application on offering **internship experiences** in Subdistrict 9C. Seasons Palm Beach will offer **internships** for social workers, music therapists, art therapists, bereavement counselors, chaplains, and medical assistants. Seasons Palm Beach will work with local schools and will also leverage existing national contracts. Seasons Palm Beach will demonstrate conformance by submitting the numbers and types of interns, their associated schools, and the length of service as part of the annual monitoring report.
- 22. Recruitment Initiatives** – Seasons Palm Beach recognizes the national nursing shortage and will take proactive steps to ensure there are well-qualified nurses in its program. Seasons Palm Beach conditions this application on implementing an employee referral campaign which will leverage the networks of existing AccentCare and Seasons employees nationwide and offer sign-on bonus to employees who refer a successful new hire to Seasons. The required annual monitoring report will include a list of employees recruited to Seasons Palm Beach through this program. As a condition of this application, Seasons will use the below-listed organizations to recruit foreign-trained, high quality workforce members. These well-established organizations facilitate a mutually beneficial relationship between foreign-

educated healthcare professionals and healthcare organizations recruiting additional staff. Recruiting through these organizations also allows Seasons to establish a team of professionals who reflect the increasingly diverse population in Florida.

- O’Grady Peyton International
- MedPro International

Seasons Palm Beach also conditions this application on its parent company attending the National Hispanic Nurses Conference for the first three years of operations. This conference will allow Seasons to recruit bilingual Spanish-speaking nurses and nurses that reflect the areas Seasons serves in Florida.

### **Providing Advanced Clinical Care**

- 23. Palliative Care** - Seasons Palm Beach will provide a clinical symptom management program for people of all ages living with an advanced illness, and emotional support for their families and caregivers. This program does not require a six-month diagnosis for patients to qualify. Seasons Palm Beach conditions this application on making its Palliative Care program available in Subdistrict 9C to persons at home and in hospitals, assisted living facilities, long-term care facilities, oncology clinics, and outpatient offices.
- 24. Cardiac Care** - This program uses hospice physicians and cardiac-trained hospice nurses to provide the latest heart failure guideline-based therapies, along with education to provide support for patients and families in their home environment. The care team helps prevent unnecessary emergency department visits and hospital admissions by focusing on symptom control, functional status, and quality of life.
- 25. AICD Deactivation Program** – Automatic implantable cardioverter-defibrillators (AICDs) are similar to pacemakers but are used on patients with a higher risk for sudden cardiac arrest. Seasons currently has an AICD Deactivation program in Delaware, and conditions this application on offering the program in Palm Beach County.
- 26. Open Access** allows eligible patients currently receiving medical treatments and/or experiencing intense psychosocial challenges access to hospice services earlier. Seasons’ Open Access program provides services many other hospices will not consider, such as ventilators for home use, radiation therapy, and chemotherapy.



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Seasons Palm Beach conditions this application on offering its Open Access program in Palm Beach County, so patients and families can access hospice and advance planning earlier. Seasons Palm Beach will demonstrate conformance with this condition by providing the number of patients each year who enter hospice care with Seasons Palm Beach through the Open Access program.

- 27. Pulmonary Care** – Chronic obstructive pulmonary disease (COPD) is the third leading cause of disease-related in the United States and is the most common cause of hospital readmission among Medicare beneficiaries. Seasons pulmonary hospice program uses a multidisciplinary approach including hospice and palliative medicine physicians, a nationally renowned hospice Pharm D expert and hospice nurses experienced in providing care and services for patients with advanced COPD and their caregiver/family members.
- 28. Compassionate Ventilator Removals** – Seasons Hospice provides compassionate ventilator removal for patients who have mechanical-assisted breathing, either through a tracheotomy or intubation. Seasons conditions this application on offering an annual continuing education event to area hospitals on the hospice approach to compassionate ventilator weaning, for the first three years of operations. Seasons will offer this education event free of charge, and will educate hospital physicians, nurses, and administrators about how hospice providers can offer vent weaning for eligible end-of-life patients, rather than having the hospital wean from ventilation before discharging to hospice. Seasons Palm Beach will demonstrate conformance with this condition by submitting copies of the advertising materials and a roster of attendees as part of the annual compliance report.

### **Conditions to Improve Patients' Hospice Experience**

- 29. Music Therapy** – This program provides an option for pain management and stress relief, and generates positive reactions in patients and their families. Seasons is the largest employer of board-certified music therapists in the nation, and conditions this application on employing a music therapist in Palm Beach County. Seasons Palm Beach will demonstrate conformance with this condition by submitting the name and credentials of its music therapist as part of the annual compliance report.

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- 30. Massage Therapy** – Seasons provides **massage therapy** through contracted professionals to improve comfort and alleviate pain in its patients. Seasons Palm Beach will enter into legally binding written agreements with licensed massage therapists to provide services to its patients. Seasons Palm Beach will demonstrate conformance with this condition by submitting a copy of the contract with the massage therapist as part of the annual compliance report.
- 31. Namaste Care** - This dementia care program, designed by internationally recognized dementia expert Joyce Simard, author of *The End-of-Life Namaste Care Program for People with Dementia*, uses multi-modal interventions to find human connectedness, decrease dementia-related symptoms, and enhance quality of life. Seasons is the only national hospice approved to implement Namaste Care, and Ms. Simard guides all staff through virtual and e-learning modules. Seasons Palm Beach will demonstrate conformance with this condition by providing training materials for staff and volunteers as part of the annual compliance report.
- 32. We Honor Veterans** - Seasons Palm Beach commits to serving veterans of the armed forces, and all Seasons hospice programs participate in the We Honor Veterans, a program of the National Hospice and Palliative Care Organization (NHPCO) in collaboration with the Department of Veterans Affairs (VA). Seasons Palm Beach conditions this application on participating in the We Honor Veterans program.
- 33. Leaving a Legacy** – This program assists patients in creating memories and tangible recordings, artwork, journals, scrapbooks, memory bears, fingerprint necklaces, and other mementoes for the family, to assist with coping during bereavement. Seasons Palm Beach conditions this application on providing this program in Subdistrict 9C.
- 34. Virtual Reality** - Seasons Palm Beach conditions this application on offering its patients a **virtual reality** experience to alleviate symptoms such as pain and anxiety and to allow patients to travel to desired locations without leaving their homes.

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- 35. Serenity Salon** – The physical and cognitive changes a person faces near the end of life can make it difficult for them to maintain personal hygiene and grooming behaviors that were once important to them. A decline in personal appearance can lower self-esteem. Serenity Salon brings self-care back to patients and makes them feel like themselves again through haircuts, hair styling, nail services, makeup application, and similar offerings.

**Suncrest Hospice Florida, LLC (CON application #10707)**, also referenced as Suncrest Florida, Suncrest or the applicant, is a development stage, for-profit Florida entity. Suncrest is parented by Suncrest Health Services, LLC, which operates a total of 14 hospices in Arizona, California, Illinois, Iowa, New Jersey, Oklahoma, Pennsylvania, Texas, Utah and Virginia. The parent currently has no licensed and no CON-approved hospice programs in Florida.

The applicant expects issuance of license in March 2022 and initiation of service in April 2022.

Total project cost is \$709,250, which consists of equipment, project development and start-up costs.

Pursuant to project approval, Suncrest Hospice Florida, LLC offers the following Schedule C conditions, which are presented below verbatim. However, we did not include references to their exhibits in the narrative and only include portions of the applicant's 'compliance documentation' when it provided additional information toward meeting the condition. The applicant agrees to condition the award of this CON application upon "delivering the services and activities described below":

**C.1. Specific Site within Service Area 9C:**

**Suncrest Florida Office Location**

Suncrest Florida is committed to increasing access for hospice care and utilization in Service Area 9C, including the underserved areas in Belle Glade and Pahokee. Suncrest Florida believes Palm Beach County's lack of public transportation, underrepresentation of medical professionals from underserved communities and lack of community outreach by existing Palm Beach County hospice providers are significant issues requiring special attention. As a result, Suncrest Florida conditions this application on having at least **two hospice offices**. An initial office will be in Belle Glade, and then an additional office will be located in or around Palm Beach, opening within the first year. Suncrest Florida believes that having a physical presence central to Service Area 9C's underserved communities is critical to ensure not

only improved access to hospice services, but also recruitment of staff from the underserved communities, which is critical to outreach to community organizations.

**C.3. Special Programs:**

**1. Mission Driven Programs**

Suncrest Florida conditions this application on implementing the following mission driven programs throughout Service Area 9C to increase quality of hospice services and increase health equity among underserved populations:

- Days of Caring – In its various markets, Suncrest provides a unique “Days of Caring” program to help hospice patients fulfill personal wishes. This program exceeds what is required by the hospice benefit and is funded by the company’s revenues and received donations. This program is especially impactful in meeting the holistic needs of socioeconomically disadvantaged patients whose families and friends may not have the means to provide such experiences. The Days of Caring program is not, however, limited to the disadvantaged. All of Suncrest’s services and programs are equally accessible to all patients regardless of their income level.
- Suncrest Palliative Care – Concurrent with initiating hospice services in this region, Suncrest Florida will offer palliative care services to Palm Beach County residents with serious illness who do not qualify for or choose to elect hospice services. Additional study will be needed to determine the best approach for this program based on community needs, but as in the other markets Suncrest serves, it will most likely be home-based and address the needs identified. As an example, information on palliative care resources Suncrest provides for families of patients being treated for cancer, including coordination with the patient’s oncologist.
- Community Bereavement Program – In addition to the standard bereavement benefit provided to families and significant others of hospice patients, Suncrest Florida will provide a community-based bereavement program for patients who did not participate in its hospice program. By partnering with community organizations and churches, temples, and mosques to provide bereavement services and promote awareness of hospice benefits, Suncrest Florida’s objective is to begin to change sociocultural biases that are prevalent in certain communities around the acceptance of hospice care. Suncrest Florida will offer community support groups, memorial services, and assistance with funeral services, as reasonably requested by the community.

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- Virtual Dementia Training Program – This program improves staff, volunteer and family member understanding of patients with dementia, decreasing dementia patient frustration and improving quality of life for both patients and their families. Participants in this program have enthusiastically reported that it gives them a new perspective of the dementia patient’s struggle that they have no consciousness of prior to the experience. Virtual Dementia Tour (“VDT”) is the original, ground-breaking, evidence-based, and scientifically proven method of building a greater understanding of dementia and is provided under contract between Suncrest and Secondwind. The VDT uses patented sensory tools and instruction based on research conducted by P.K. Beville, M.S., a specialist in geriatrics and the founder of Second Wind Dreams®. During a VDT experience, trained facilitators guide participants outfitted with patented sense-altering devices through common everyday tasks and exercises. The VDT enables caregivers to experience for themselves the physical and mental challenges those with dementia face and use the experience to provide better person-centered care. Proceeds from VDT are used to fulfill the mission of Second Wind Dreams to make dreams come true for elders who live in long-term care.

This program is also consistent with the priorities of the Palm Beach County Health Plan. In the existing markets Suncrest operates, VDT training is performed internally by Suncrest trainers who have been credentialed by Secondwind. Suncrest Florida plans to outsource VDT training to a vendor credentialed in Florida to meet the local requirements when they initially begin operating in the state.

- CREATE – Suncrest utilizes a unique employee training program that focuses on service excellence and has earned Suncrest “Top Place to Work” awards in Arizona, California and Iowa. CREATE (**C**ommunication; **R**esponding quickly; **E**ducate with every interaction; **A**sk how to better support patients and caregivers; **T**reat everyone with respect; **E**very visit will be on time) is a service philosophy that puts Suncrest’s mission statement into action; it puts patient and family at the center of everything Suncrest does and empowers Suncrest staff to consistently offer the best quality of care to patients, families and referral sources. CREATE will be taught to every new Suncrest Florida employee and reinforced at every care planning meeting, at all staff in-services, and at Suncrest’s quarterly Quality Assurance Performance Improvement meetings.
- Certified Trainer Program – Competency in hospice care is not learned solely through reading and training; it also involves the observation of techniques and approaches expertly applied by experienced professionals. Suncrest Florida will utilize this mentorship program that pairs seasoned hospice professionals with

new employees to ensure new employees succeed at work. The Suncrest Hospice Certified Training Program works to provide the highest level of quality patient care by increasing staff support for new employees, providing a team approach for learning and growth, and fostering stronger relationships among team members. Suncrest Certified Trainers serve as an additional support person to each new employee in order to promote their professional growth and success.

- STARS – The Suncrest STARS (Sharing Time and Reassurance Selflessly) program provides intensive patient and family support during crisis situations and at the end of life and will be offered by Suncrest Florida. In the STARS model, Suncrest’s interdisciplinary team is alerted by email whenever a patient is in crisis or near death. The team members assigned to that patient all make visits to assess the situation, update the plan of care, and intensify the visit schedule based on the needs of the patient and caregivers. This includes an emphasis on spiritual support, emotional support, skilled interventions from the medical team, and increased services from hospice aides to support personal care and activities of daily living. This program results in increased visit frequency that is responsive to patient and family needs. Suncrest reports that this program is the key to its success at achieving the high number of visits it does throughout the company in the last seven days and last three days of life. As a result, Suncrest hospice programs exceed state average visit frequency in all markets and demonstrates superior quality of care.
- Music and Massage Therapies – Suncrest enhances hospice services using complementary therapies such as music therapy and massage therapy to address patients’ physical and emotional suffering and to enhance well-being. These services are provided primarily by Suncrest employed therapists, and music therapy volunteers throughout the company. In Florida, Suncrest Florida will initiate these programs with appropriately trained volunteers, and as the census grows, professional staff will be hired as well.

## **2. Increased Visits**

Knowledgeable providers of services to hospice patients are saying that the existing hospice providers in Palm Beach County are providing an insufficient number of visits towards the end of life. As evidenced by Medicare data, Suncrest provides more services in the last three and last seven days than the existing hospice providers serving the residents of Palm Beach County. Suncrest Florida conditions this application on providing increased visits in the last 3 and 7 days of Suncrest Florida’s patients’ lives, as compared to the number of visits currently being provided by the existing hospice providers in Service Area 9C. CMS

reports that there is evidence available supporting the conclusion that increased clinician visits to patients at end of life are associated with improved outcomes for both the patients and their caregivers. Compliance with this condition will be documented to AHCA by the submission of Annual Medicare Claims data on a one-year trailing basis to be reported in the first two annual CON compliance reports.

### **3. CNA Education Scholarship**

Suncrest Florida is committed to recruiting residents from the Belle Glade and Pahokee communities for health care profession opportunities with Suncrest Florida. Average household income in Belle Glade and Pahokee is the lowest in Palm Beach County. Suncrest Florida is committed to providing resources that contribute to the training of community members in Belle Glade and Pahokee to become employed in the health care industry, including potentially to Suncrest Florida. Suncrest Florida conditions this application on providing education scholarship in each of the first two years of operation to individuals pursuing Certified Nursing Assistant certifications.

- **Sponsorship Level:** Suncrest Florida will provide a scholarship grant of \$50,000, in the aggregate, per year in each of the first two years of operation to individuals pursuing Certified Nursing Assistant training. Suncrest Florida anticipates that the grant funding should support approximately 50 CNAs, per year. At least half of the grant amount (\$25,000) will sponsor individuals pursuing CNA certification who are residents of Belle Glade or Pahokee.

Compliance with this condition will be documented to AHCA by providing AHCA with a copy of the checks and information on what the checks funded in the first two annual condition compliance reports.

### **4. Disease Specific Programs in Palm Beach County**

Suncrest Florida conditions this application on providing the following community education, outreach, financial support commitments and feedback:

#### **Cardiovascular Disease:**

- Community education and outreach (*with emphasis on reaching underserved populations*): As cardiovascular disease is the top cause of death across the general Palm Beach County population, including Blacks and Hispanics, Suncrest Florida will pursue meaningful opportunities to participate in the community outreach activities of the American Heart Association and other healthcare organizations and providers to promote awareness of the impact of cardiovascular

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illnesses. Suncrest Florida will also independently pursue cardiovascular health education through its efforts with churches, temples, mosques, and other religious and community organizations, with a focus on doing so in disadvantaged neighborhoods. This education will focus on the benefits and support that hospice services provide in advanced cardiovascular illness.

- Provider Input: Suncrest Florida will conduct research using Trella Marketscape database to identify medical providers in the market who refer patients for hospice care with cardiovascular disease, including congestive heart failure, stroke, and hypertension, and have community outreach staff meet with them to get their input on hospice care for this population. Additionally, Suncrest Florida will publicize and hold annual meetings open to area physicians, their support staff, and other stakeholders which will be a forum to discuss Suncrest Florida's cardiovascular disease program. Suncrest Florida will invite feedback from participants on community and patient needs related to cardiovascular disease and ways to improve Suncrest's cardiovascular disease program. These meetings will be made accessible to participants across Palm Beach County. Suncrest Florida will also meet with Palm Beach Medical Society for a general meeting on all causes of death in Palm Beach County and obtain their input.
- Community Support: Suncrest Florida will provide donations to organizations that support community education and awareness of cardiovascular disease for the first two years of operation including:

\$10,000 annually to the Palm Beach County chapter of the American Heart Association  
(<https://www.heart.org/en/affiliates/florida/palm-beach-county>) for community education and awareness.

Compliance with this condition will be documented to AHCA by providing AHCA with a copy of the checks and information on what organizations the checks funded in the first two annual CON condition compliance reports.

### **Cancer:**

- Community education and outreach (*with emphasis on reaching underserved populations*): Since cancer, including breast cancer, lung cancer, cervical cancer, prostate cancer, colorectal cancer are top causes of death across the general Palm Beach County population, including Hispanics, Suncrest Florida will pursue meaningful opportunities to participate in the community outreach activities of the American Cancer Society, Cancer Alliance of Help and Hope, the Florida Breast Cancer Foundation, and other



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healthcare organizations and providers. Suncrest Florida will also independently pursue cancer health education through its engagement efforts with churches, temples, mosques, and other religious and community organizations, with a focus on doing so in disadvantaged neighborhoods.

- Provider Input: Suncrest Florida will conduct research using Trella Marketscape database to identify medical providers in the market who refer patients for hospice care with cancer, including breast cancer, lung cancer, pancreatic cancer, ovarian cancer, prostate cancer, colorectal cancer, and cervical cancer, and hematologic malignancies. Suncrest Florida's community outreach staff meet with them individually to get their input on hospice care for this population. Staff will also identify other referral sources such as hospitals, community health centers, and residential healthcare facilities for the same discussion. Additionally, Suncrest Florida will publicize and hold annual meetings open to area physicians, their support staff, and other stakeholders which will be a forum to discuss Suncrest Florida's cancer program. Suncrest Florida will invite feedback from participants on community and patient needs related to cancer and ways to improve Suncrest's cancer program. These meetings will be made accessible to participants across Palm Beach County. These meetings will be made accessible to participants across Palm Beach County. Suncrest Florida will also meet with Palm Beach Medical Society for a general meeting on all causes of death in Palm Beach County and obtain their input.
- Community Support (actual or planned financial support for relevant organization): Suncrest Florida will provide donations to organizations that support community education and awareness of cancer, including breast cancer, lung cancer, cervical cancer, prostate cancer, and colorectal cancer, for the each of the first two years of operation including:

c) \$5,000 annually to the Florida Breast Cancer Foundation (<https://www.floridabreastcancer.org/>) for community education and awareness in Palm Beach County.

d) \$5,000 annually to the Cancer Center of South Florida (<https://cancercenterofsouthflorida.com/>) for community education and awareness in Palm Beach County.

Suncrest Florida will also consider meaningful opportunities to participate with the local chapters of the American Cancer Society and Cancer Alliance of Help and Hope, as well as other groups who may be sponsoring community education and awareness about various cancer diagnosis in Palm Beach County. Suncrest has a long history of partnering with local organizations where there is a

meaningful opportunity to make an impact. **Compliance with this condition** will be documented to AHCA by providing AHCA with a copy of the checks and information on what organizations the checks funded in the first two annual CON condition compliance reports.

**Respiratory Disease:**

- Community education and outreach (*with emphasis on reaching underserved populations*): Particularly as chronic respiratory diseases are among the top causes of death across the general Palm Beach County population, including Blacks and Hispanics, Suncrest Florida will pursue meaningful opportunities to participate in the community outreach activities of the American Lung Association of Florida, the Greater Palm Beach Chapter of the Cystic Fibrosis Foundation, and other healthcare organizations and providers. Suncrest Florida will also independently pursue respiratory disease education through its engagement efforts with churches, temples, mosques, and other religious and community organizations, with a focus on doing so in disadvantaged neighborhoods. These programs will focus on the benefits of hospice care in end stage disease but will also include preventative health education for the general community, including the importance of smoking cessation. Through its Palliative Care Program, Suncrest Florida will also help community members with oxygen dependence ensure they have individualized emergency plans in place for weather emergencies and other sources of power disruptions
- Provider Input: Suncrest Florida will conduct research using Trella Marketscape database to identify medical providers in the market who refer patients for hospice care with respiratory diseases, including chronic obstructive pulmonary disease and other chronic lower respiratory disease/lung disease, and have community outreach staff meet with them individually to get their input on hospice care for this population. During these meetings, staff will ask what issues the provider has experienced in obtaining hospice care for these patients, and what unmet needs may need to be addressed. Staff will also identify other referral sources such as hospitals, community health centers, and residential healthcare facilities for the same discussion. Additionally, Suncrest Florida will publicize and hold annual meetings open to area physicians, their support staff, and other stakeholders which will be a forum to discuss Suncrest Florida's respiratory disease program. Suncrest Florida will invite feedback from participants on community and patient needs related to respiratory disease and ways to improve Suncrest's respiratory disease program. These meetings will be made accessible to participants across Palm Beach County. These meetings will be made accessible to participants across Palm Beach

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County. Suncrest Florida will also meet with Palm Beach Medical Society for a general meeting on all leading causes of death in Palm Beach County and obtain their input.

- Community Support: Suncrest Florida will provide donations to organizations that support community education and awareness of respiratory disease for each of the first two years of operation including:

c) \$5,000 annually to the Greater Palm Beach Chapter of the Cystic Fibrosis Foundation (<https://www.cff.org/PalmBeach/>) for community education and awareness in Palm Beach County; and

d) \$5,000 annually to the American Lung Foundation (<https://www.lung.org/>) for community education and awareness in Palm Beach County.

Suncrest Florida will also consider meaningful opportunities to participate with other groups who may be sponsoring community education and awareness on various respiratory diseases. Suncrest has a long history of partnering with local organizations where there is a meaningful opportunity to make an impact.

**Compliance with this condition** will be documented to AHCA by providing AHCA with a copy of the checks and information on what organizations the checks funded as well as a report on community education and outreach in the first two annual CON condition compliance reports.

### **Kidney Disease:**

- Community education and outreach (*with emphasis on reaching underserved populations*): Particularly as kidney diseases are among the top causes of death across the general Palm Beach County population, Suncrest Florida will pursue meaningful opportunities to participate in the community outreach activities of the National Kidney Foundation of Florida, the Kidney Association of South Florida, and other healthcare organizations and providers. Suncrest Florida will also independently pursue kidney disease education through its engagement efforts with churches, temples, mosques, and other religious and community organizations, with a focus on doing so in disadvantaged neighborhoods. This will include proactive strategies to identify and address underlying causes of kidney disease through blood pressure and blood glucose screenings, and dietary education for managing these conditions in coordination with regular medical care.

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- Provider Input: Suncrest Florida will conduct research using Trella Marketscape database to identify medical providers in the market who refer patients for hospice care with kidney disease, including nephritis, nephrosis, and nephrotic syndrome, and have community outreach staff meet with them individually to get their input on hospice care for this population. During these meetings, staff will ask what issues the provider has experienced in obtaining hospice care for these patients, and what unmet needs may need to be addressed. Staff will also identify other referral sources such as hospitals, community health centers, and residential healthcare facilities for the same discussion. Additionally, Suncrest Florida will publicize and hold annual meetings open to area physicians, their support staff, and other stakeholders which will be a forum to discuss Suncrest Florida's kidney disease program. Suncrest Florida will invite feedback from participants on community and patient needs related to kidney disease and ways to improve Suncrest's kidney disease program. These meetings will be made accessible to participants across Palm Beach County. These meetings will be made accessible to participants across Palm Beach County. Suncrest Florida will also meet with Palm Beach Medical Society for a general meeting on all leading causes of death in Palm Beach County and obtain their input.
- Community Support: Suncrest Florida will provide donations to organizations that support community education and awareness of kidney disease for each of the first two years of operation including:
  - c) \$5,000 annually to the Kidney Association of South Florida (<https://aakp.org/support-groups/kidney-association-south-florida/>) for community education and awareness in Palm Beach County; and
  - d) \$5,000 annually to the National Kidney Foundation of Florida, the (<https://kidneyfl.org/>) for community education and awareness in Palm Beach County.

Suncrest Florida will also consider meaningful opportunities to participate with other groups who may be sponsoring community education and awareness on various kidney diseases. Suncrest has a long history of partnering with local organizations where there is a meaningful opportunity to make an impact.

**Compliance with this condition** will be documented to AHCA by providing AHCA with a copy of the checks and information on what organizations the checks funded as well as a report on community education and outreach in the first two annual CON condition compliance reports.

**Liver Disease:**

- Community education and outreach (*with emphasis on reaching underserved populations*): Particularly as chronic liver disease is in top causes of death across the general Palm Beach County population, including among Hispanics, Suncrest Florida will pursue meaningful opportunities to participate in the community outreach activities of the Florida State Resource Center of the American Liver Foundation and other healthcare organizations and providers. Suncrest Florida will also independently pursue chronic liver disease health education through its engagement efforts with churches, temples, mosques, and other religious and community organizations, with a focus on doing so in disadvantaged neighborhoods. This will include education about the importance of vaccination for hepatitis B, universal screening for hepatitis C, and risks of injection drug use and alcohol misuse. Through its Palliative Care Program, Suncrest Florida will provide supportive services to those undergoing active treatment for chronic liver disease, including those who are listed for liver transplantation.
- Provider Input: Suncrest Florida will conduct research using Trella Marketscape database to identify medical providers in the market who refer patients for hospice care with chronic liver disease and have community outreach staff meet with them individually to get their input on hospice care for this population. During these meetings, staff will ask what issues the provider has experienced in obtaining hospice care for these patients, and what unmet needs may need to be addressed. Staff will also identify other referral sources such as hospitals, community health centers, and residential healthcare facilities for the same discussion. Additionally, Suncrest Florida will publicize and hold annual meetings open to area physicians, their support staff, and other stakeholders which will be a forum to discuss Suncrest Florida's liver disease program. Suncrest Florida will invite feedback from participants on community and patient needs related to liver disease and ways to improve Suncrest's liver disease program. These meetings will be made accessible to participants across Palm Beach County. These meetings will be made accessible to participants across Palm Beach County. Suncrest Florida will also meet with Palm Beach Medical Society for a general meeting on all leading causes of death in Palm Beach County and obtain their input.
- Community Support: Suncrest Florida will provide donations to organizations that support community education and awareness of liver disease for each of the first two years of operation including:

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b) \$10,000 annually to the Florida State Resource Center of the American Liver Foundation (<https://liverfoundation.org/florida-state-resource-center/>) for community education and awareness in Palm Beach County.

Suncrest Florida will also consider meaningful opportunities to participate with other groups who may be sponsoring community education and awareness on liver disease. Suncrest has a long history of partnering with local organizations where there is a meaningful opportunity to make an impact.

**Compliance with this condition** will be documented to AHCA by providing AHCA with a copy of the checks and information on what organizations the checks funded as well as a report on community education and outreach in the first two annual CON condition compliance reports.

### **Diabetes:**

- Community education and outreach (*with emphasis on reaching underserved populations*): In 2018, there were 827 deaths in Palm Beach County where diabetes was indicated as the cause of death. Particularly as diabetes mellitus is in top causes of death in multiple Palm Beach County populations, including Blacks and Hispanics, Suncrest Florida will pursue meaningful opportunities to participate in the community outreach activities of the Diabetes Coalition of Palm Beach County JDRF, and the American Diabetes Association of West Palm Beach and other healthcare organizations and providers. Suncrest Florida will also independently pursue diabetes mellitus health education through its engagement efforts with churches, temples, mosques, and other religious and community organizations, with a focus on doing so in disadvantaged neighborhoods. These activities will include diabetes awareness education, particularly of the hereditary risk for certain forms of diabetes, blood glucose screening, the importance of exercise and weight management in diabetes prevention, and dietary strategies for both the prevention and management of the disease.
- Provider Input: Suncrest Florida will conduct research using Trella Marketscape database to identify medical providers in the market who refer patients for hospice care with diabetes mellitus and have community outreach staff meet with them individually to get their input on hospice care for this population. Patients with diabetes are typically identified for hospice care on the basis of secondary complications of diabetes, such as vascular disease and renal disease, rather than the primary diagnosis of diabetes itself. Additionally, patients with other terminal illnesses, such as cancers and dementia, often have diabetes as a significant comorbidity that

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affects the trajectory of the illness. Staff will learn what issues the provider has experienced in obtaining hospice care for these patients, and what unmet needs may need to be addressed. Staff will also identify other referral sources such as hospitals, community health centers, and residential healthcare facilities for the same discussion. Additionally, Suncrest Florida will publicize and hold annual meetings open to area physicians, their support staff, and other stakeholders which will be a forum to discuss Suncrest Florida's diabetes program. Suncrest Florida will invite feedback from participants on community and patient needs related to diabetes and ways to improve Suncrest's diabetes program. These meetings will be made accessible to participants across Palm Beach County. These meetings will be made accessible to participants across Palm Beach County. Suncrest Florida will also meet with Palm Beach Medical Society for a general meeting on all leading causes of death in Palm Beach County and obtain their input.

- Community Support: Suncrest Florida will provide donations to organizations that support community education and awareness of diabetes mellitus for each of the first two years of operation including:

c) \$5,000 annually to the Diabetes Coalition of Palm Beach County (<https://diabetescoalitionpbc.org/>) for community education and awareness in Palm Beach County; and

d) \$5,000 annually to the American Diabetes Association of West Palm Beach (<https://diabetes.org/community/local-offices/florida>) for community education and awareness in west Palm Beach County.

Suncrest Florida will also consider meaningful opportunities to participate with other groups who may be sponsoring community education and awareness on diabetes mellitus. Suncrest has a long history of partnering with local organizations where there is a meaningful opportunity to make an impact.

**Compliance with this condition** will be documented to AHCA by providing AHCA with a copy of the checks and information on what organizations the checks funded as well as a report on community education and outreach in the first two annual CON condition compliance reports.

### **Alzheimer's Disease:**

- Community education and outreach (*with emphasis on reaching underserved populations*): Since Alzheimer's disease is among the top causes of death across the general Palm Beach County population,

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including among Hispanics, Suncrest Florida will pursue meaningful opportunities to participate in the community outreach activities of the Alzheimer's Association, Southeast Florida Chapter, and other healthcare organizations and providers. Suncrest Florida will also independently pursue Alzheimer's disease education through its engagement efforts with churches, temples, mosques, and other religious and community organizations, with a focus on doing so in disadvantaged neighborhoods. This education will focus on understanding the trajectory of Alzheimer's Disease, the need for early advance care planning while patients retain decision making ability, recognition of the hallmarks of end stage disease, and burdens/benefits of medical interventions in advanced disease, such as tube feedings, hospitalization for repeated infection, and life sustaining mechanical ventilatory support.

- Provider Input: Suncrest Florida will conduct research using Trella Marketscape database to identify medical providers in the market who refer patients for hospice care with Alzheimer's disease and have community outreach staff meet with them individually to get their input on hospice care for this population. During these meetings, staff will ask what issues the provider has experienced in obtaining hospice care for these patients, and what unmet needs may need to be addressed. Staff will also identify other referral sources such as hospitals, community health centers, and residential healthcare facilities for the same discussion. Additionally, Suncrest Florida will publicize and hold annual meetings open to area physicians, their support staff, and other stakeholders which will be a forum to discuss Suncrest Florida's Alzheimer's Disease program. Suncrest Florida will invite feedback from participants on community and patient needs related to Alzheimer's Disease and ways to improve Suncrest's Alzheimer's Disease program. These meetings will be made accessible to participants across Palm Beach County. These meetings will be made accessible to participants across Palm Beach County. Suncrest Florida will also meet with Palm Beach Medical Society for a general meeting on all leading causes of death in Palm Beach County and obtain their input.
- Community Support: Suncrest Florida will provide donations to organizations that support community education and awareness of Alzheimer's Disease for each of the first two years of operation including:

b) \$10,000 annually to the Alzheimer's Association, Southeast Florida Chapter (<https://www.alz.org/seflorida>) for community education and awareness in Palm Beach County.



Suncrest Florida will also consider meaningful opportunities to participate with other groups who may be sponsoring community education and awareness on Alzheimer's Disease.

**Compliance with this condition** will be documented to AHCA by providing AHCA with a copy of the checks and information on what organizations the checks funded as well as a report on community education and outreach in the first two annual CON condition compliance reports.

## **5. Healthcare Provider Education**

Suncrest Florida will offer ad hoc continuing education to area healthcare providers, in no event less than semi-annually. These education programs will focus on Suncrest Florida's disease specific programs in addition to general end-of-life and respite care training.

## **6. Quality and Patient Satisfaction Program**

Suncrest Florida is committed to providing high-quality patient care in Service Area 9C and to continuously reviewing its performance for improvement. Suncrest Florida's quality model will foster competition and enhance quality and access for consumers as well as promote cost effectiveness for the Palm Beach County health system. In addition to receiving annual input from local physicians on the effectiveness of its disease programs, Suncrest Florida will provide, and conditions its application on providing, the following quality and patient satisfaction measures:

- **Accreditation:** Suncrest Florida will apply for and attain (Community Health Accreditation Partner (CHAP) accreditation.
- **Satisfaction Improvement Manager:** Suncrest Florida will appoint a satisfaction improvement manager with responsibility for overseeing the success of Suncrest Florida's patient satisfaction efforts and to monitor community feedback and propose changes, as needed, to the local staff.

**Compliance with this condition** will be documented to AHCA by providing the name of the Satisfaction Improvement Manager in the first CON condition compliance report.

- **Mission Driven Programs:** Further described in item C.3. (1) above.

**C.4. Other Conditions:**

**1. Services Beyond the Hospice Benefit**

Suncrest Florida is proud to continue a Suncrest legacy of standard services that exceed those offered by existing Palm Beach County hospice providers. Suncrest Florida conditions this application on providing the following services, which are routinely provided by Suncrest hospice programs:

- Providing patient admissions in the evening and weekends.
- Bereavement Services will be provided by local bereavement personnel who have training and experience in dealing with grief and who will be available 24/7 to answer questions and provide guidance.
- Offering a 24-hour call system directly to Suncrest Florida's nurse-on-call to provide caregivers with assurance and guidance.
- Suncrest Florida is committed to providing important assistance to daily living courses for the community, including education about long term care facilities, assisted living facilities, and community groups.
- Suncrest Florida's QAPI team will develop annual benchmark and performance improvement plans based on quarterly quality score and compliance reviews conducted internally.
- Suncrest Florida's bereavement services will be provided to families and friends for up to 13 months after patient passing in addition to providing community support groups and community counseling. Additionally, Suncrest Florida's QAPI team will identify the need for additional support groups quarterly.

**2. Suncrest Florida Will Not Solicit Donations From Patients, Caregivers, Staff**

Suncrest Florida acknowledges the financial hardships often present in underserved communities as well as the financial hardship of caring for a family member or loved one during end of life. As such, Suncrest Florida will not solicit charitable contributions from patients, caregivers or staff in Service Area 9C. Any unsolicited donations received will be given to Suncrest Care Foundation, a non-profit organization that uses funds to provide various health-targeted projects, so as to ensure that all money goes back to the local Palm Beach County community.

**3. Outreach and End-of-Life Education for Black Palm Beach County Patients**

Consistent with the Palm Beach County Health Plan, which identifies the importance of health equity and reducing health care disparities,

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Suncrest Florida seeks to bring its care model to Florida to increase access to hospice services in the lowest income underserved communities, particularly the Black population, which demands greater health equity in the utilization of hospice services. As evidenced by CMS data and extensive study conducted by Suncrest Florida, the existing hospice providers in Palm Beach County are not serving the black population at levels proportionate to their representation in the general population. Suncrest Florida. The partnerships that Suncrest Florida is developing with organizations in Belle Glade and other organizations representing underserved communities in Palm Beach County, in addition to locating an office in Belle Glade, are the means and manner of developing the relationships, information and opportunities to provide more meaningful access to Palm Beach County's underserved black population.

- Additionally, Suncrest Florida conditions this application on Suncrest Florida providing donations to organizations that support community education and awareness of hospice services among the Black population in Palm Beach County, for each of the first two years of operation including:

- c) \$15,000 annually to the St. John First Baptist Church for community education and awareness in Palm Beach County; and
- d) \$15,000 annually to the Black Chamber of Commerce of Palm Beach County (<https://blackchamberpbc.com/>) for community education and awareness in Palm Beach County. As of this date hereof, Suncrest Florida has already made an \$8,000 donation to the Black Chamber of Commerce of Palm Beach County.

Suncrest Florida will also consider meaningful opportunities to participate with the other groups who may be sponsoring community education and awareness of hospice services among black populations in Palm Beach County.

**Compliance with this condition** will be documented to AHCA by providing AHCA with a copy of the checks and information on what organizations the checks funded as well as a report on community education and outreach in the first two annual CON condition compliance reports.

#### **4. Outreach and End-of-Life Education for Hispanic Palm Beach County Patients**

Suncrest Florida also plans to address disparities in Hispanic access to hospice services within Palm Beach County. A 2012 study titled "A Case Study of Hispanics and Hospice Care," found that language barriers, lack of diverse staff, cultural differences regarding family roles, and lack

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of education with respect to end-of-life care all contribute to disparities in access to hospice services among Hispanics compared to whites. In order to combat these barriers to hospice services among Hispanics, Suncrest Florida has reviewed studies, such as the aforementioned, and in line with study recommendations, plans to hire bilingual staff and volunteers. It will also ensure that all advertising and marketing materials are available in Spanish. Suncrest Florida will provide AHCA with a staff census identifying languages spoken as part of the first two annual CON condition compliance reports.

Additionally, Suncrest Florida conditions this application on Suncrest Florida providing donations to organizations that support community education and awareness of hospice services for the Hispanic population in Palm Beach County, for each of the first two years of operation including:

- c) \$15,000 annually to the Palm Beach County Hispanic Chamber of Commerce (<https://hispanicchamberpbc.com/board-of-directors>) for community education and awareness in Palm Beach County; and
- d) \$15,000 annually to the Florida Hispanic American Chamber of Commerce (<https://hispanicchamber.org/>) for community education and awareness in Palm Beach County.

Suncrest Florida will also consider meaningful opportunities to participate with the other groups who may be sponsoring community education and awareness of hospice services among Hispanic patients. **Compliance with this condition** will be documented to AHCA by providing AHCA with a copy of the checks and information on what organizations the checks funded as well as a report on community education and outreach in the first two annual CON condition compliance reports.

### **5. Outreach and End-of-Life Education for Palm Beach County Patients Experiencing Homelessness or with No Caregiver at Home**

Suncrest Florida contends that terminally-ill patients with no at-home support will receive increased attention from hospice staff and that every effort will be made to develop a caregiver network from among neighbors, nearby relatives and friends, faith community members and hospice volunteers to provide guidance, assistance and companionship to the patient within the patient's or the caregiver's home. The issue of homelessness is significant. About 1,400 people in Palm Beach County were identified as homeless in 2019, up almost 100 from the previous year. Suncrest Florida has invited input from prominent interest groups

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representing such patients within Palm Beach County on order to best customize these plans to respond to local needs.

In addition to implementing these strategies, Suncrest Florida conditions this application on Suncrest Florida providing donations to organizations that support community education and awareness of hospice services for patients experiencing homelessness or lacking a caregiver at home, for each of the first two years of operation including:

- d) \$10,000 annually to the United Way of Palm Beach County (<https://unitedwaypbc.org/>) for community education and awareness in Palm Beach County. As of this date hereof, Suncrest Florida has already made a \$10,000 donation in 2021 to the United Way of Palm Beach;
- e) \$10,000 annually to Meals on Wheels of Palm Beach (<https://www.mealsonwheelspalmbeaches.org/>) for community education and awareness in Palm Beach County; and
- f) \$10,000 annually to Guardians of the Glades (<https://guardiansoftheglades.com/>) for community education and awareness in Palm Beach County.

Suncrest Florida will also consider meaningful opportunities to participate with the other groups who may be sponsoring community education and awareness of hospice services among patients experiencing homelessness or lacking a primary caregiver at home. Suncrest has a long history in other markets of partnering with local organizations where there is a meaningful opportunity to make an impact.

**Compliance with this condition** will be documented to AHCA by providing AHCA with a copy of the checks and information on what organizations the checks funded in the first two annual CON condition compliance reports.

### **6. Outreach and End-of-Life Education for Palm Beach County Patients Living with HIV/AIDS**

Suncrest Florida promises that patients will not be discriminated against based on disease process. Suncrest Florida will be meeting the needs of all disease processes related to the hospice diagnosis. The applicant will develop and maintain strong relationships with the community to provide community support. Suncrest Florida will pursue opportunities to work with the State's Minority Aids Initiative (MAI) providers serving Black/African American and Hispanic/Latino clients and the AIDS Drug Assistance Program (ADAP) to increase equity among insured and uninsured clients by providing expanded access to

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medications through a network of independent pharmacies and commercial chains.

In addition to implementing these strategies, Suncrest Florida conditions this application on Suncrest Florida providing donations to organizations that support community education and awareness of hospice services for patients living with HIV/AIDS, for each of the first two years of operation including:

- c) \$10,000 annually to the Palm Beach County HIV Care Council (<https://unitedwaypb.org/>) for community education and awareness in Palm Beach County; and
- d) \$10,000 annually AIDS Healthcare Foundation (<https://www.aidshealth.org/>) for community education and awareness in Palm Beach County.

Suncrest Florida will also consider meaningful opportunities to participate with the other groups who may be sponsoring community education and awareness of hospice services among patients living with HIV/AIDS.

**Compliance with this condition** will be documented to AHCA by providing AHCA with a copy of the checks and information on what organizations the checks funded in the first two annual CON condition compliance reports.

**7. Outreach and End-of-Life Education for Palm Beach County Patients Identifying as LGBTQIA+**

Suncrest Florida promotes a policy of non-discrimination and inclusiveness and looks forward to implementing strategies in Palm Beach County which target improving hospice access for patients identifying as LGBTQIA+. Suncrest Florida has designed strategies that it will implement in order to improve access to hospice care for persons who self-identify as LGBTQIA+. Additionally, Suncrest Florida conditions this application on Suncrest Florida providing donations to organizations that support community education and awareness of hospice services for patients identifying as LGBTQIA+, for each of the first two years of operation including:

- c) \$10,000 annually to the Compass Community Center (<https://compassglcc.com/>) for community education and awareness in Palm Beach County; and
- d) \$10,000 annually the Palm Beach Chapter of PFLAG (<https://pflag.org/chapter/pflag-palm-beach>) for community education and awareness in Palm Beach County.

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Suncrest Florida will also consider meaningful opportunities to participate with the other groups who may be sponsoring community education and awareness of hospice services among patients identifying as LGBTQIA+.

**Compliance with this condition** will be documented to AHCA by providing AHCA a copy of the checks and information on what organizations the checks funded in the first two annual CON condition compliance reports.

**Transitions Intermediate Holdings, LLC (CON application #10708)**, also referenced as Transitions or the applicant is a for-profit, development stage Florida entity. Transitions states being a leading hospice and palliative care provider in the midwestern United States, with currently licensed and active hospice operations in the states of Michigan, Illinois, Indiana and Pennsylvania (with a total of five hospice agencies in 124 counties). Transitions is not hospice-licensed in Florida and no Transitions hospice affiliate is CON-approved to be hospice-licensed in Florida.

In this batching cycle, Transitions also proposes to establish new hospice programs in SAs 1, 3B and 6B.

The applicant expects issuance of license and initiation of service in October 2022.

The applicant proposes \$688,701 in total project costs, which include equipment, project development and start-up costs.

CON application #10708, Tab C, includes a signed (by the applicant's authorized representative) and dated (10/25/21), page one of one, Schedule C (Certificate of Need Predicated on Conditions/AHCA Form 3150-0001 August 2020). The reviewer notes that on this Schedule C:

- An "X" is shown for items C.2., C.3. and C.4., indicating "Please see attached" for each of the three items – but nothing is attached
- A "3" is shown for item D to indicate how many pages follow the Schedule C/Certificate of Need Predicated on Conditions page – but no pages follow

A search of CON application #10708 in its entirety reveals no Schedule C attachment pages.

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*Hospice programs are required by federal and state law to provide services to everyone requesting them and therefore the Agency would not place conditions on a program to provide legally required services such as palliative radiation and chemotherapy and care to the indigent and charity patients.*

*Should a project be approved, the applicant's proposed conditions would be reported in the annual condition compliance report as required by Rule 59C-1.013(3), Florida Administrative Code. The proposed conditions are as stated. However, Section 408.043(3) Florida Statutes states that "Accreditation by any private organization may not be a requirement for the issuance or maintenance of a certificate of need under ss. 408.031-408.045, Florida Statutes." Also, any conditions proposed that are required hospice services would not require condition compliance reports.*

*Section 400.606(5), Florida Statutes states that "The agency may deny a license to an applicant that fails to meet any condition for the provision of hospice care or services imposed by the agency on a certificate of need by final agency action, unless the applicant can demonstrate that good cause exists for the applicant's failure to meet such condition." Issuance of a CON is required prior to licensure of certain health care facilities and services.*

*The review of a CON application and ultimate approval or denial of a proposed project is based upon the applicable statutory criteria in the Health Facility and Services Development Act (408.031-408.045, Florida Statutes) and criteria in Chapter 59C-1, Florida Administrative Code. An approved CON does not guarantee licensure of the proposed project. Meeting the applicable licensure requirements and licensure of the proposed project is the sole responsibility of the applicant.*

### **D. REVIEW PROCEDURE**

The evaluation process is structured by the certificate of need review criteria found in Section 408.035, Florida Statutes, rules of the State of Florida, and Chapter 59C-1, Florida Administrative Code. These criteria form the basis for the goals of the review process. The goals represent desirable outcomes to be attained by successful applicants who demonstrate an overall compliance with the criteria. Analysis of an applicant's capability to undertake the proposed project successfully is conducted by evaluating the responses provided in the application and independent information gathered by the reviewer.



Applications are analyzed to identify various strengths and weaknesses in each proposal. If more than one application is submitted for the same type of project in the same district (subdistrict or service planning area), applications are comparatively reviewed to determine which applicant best meets the review criteria.

Section 59C-1.010(3)(b), Florida Administrative Code, prohibits any amendments once an application has been deemed complete. The burden of proof to entitlement of a certificate rests with the applicant.

As such, the applicant is responsible for the representations in the application. This is attested to as part of the application in the certification of the applicant.

As part of the fact-finding, consultant Steve Love analyzed the application in its entirety with consultation from financial analyst Derron Hillman of the Bureau of Central Services who evaluated the financial data.

**E. CONFORMITY OF PROJECT WITH REVIEW CRITERIA**

The following indicate the level of conformity of the proposed project with the review criteria and application content requirements found in Sections 408.035 and 408.037 Florida Statutes, applicable rules of the State of Florida, and Chapter 59C-1, Florida Administrative Code.

**1. Fixed Need Pool**

**a. Does the project proposed respond to need as published by a fixed need pool? Or does the project proposed seek beds or services in excess of the fixed need pool? Rule 59C-1.008(2), Florida Administrative Code.**

In Volume 47, Number 152, of the Florida Administrative Register, dated August 6, 2021, need for one hospice program was published in SA 9C for the January 2023 hospice planning horizon. The co-batched applicants are applying in response to published need.

SA 9C is currently served by the following providers:

- Hospice by the Sea Inc
- Hospice of Palm Beach County Inc
- Palm Beach Hospice of MorseLife
- VITAS Healthcare Corporation of Florida

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SA 9C hospice admissions for the 12 months ending June 30, 2021, are shown in the table below.

**SA 9C Admissions  
12 Months Ending June 30, 2021**

<b>Hospice</b>	<b>Admissions</b>
Hospice by the Sea Inc	1,873
Hospice of Palm Beach County Inc	7,227
Palm Beach Hospice of MorseLife	183
VITAS Healthcare Corporation of Florida	2,449
<b>Total</b>	<b>11,732</b>

Source: Florida Need Projections for Hospice Programs for the January 2023 Hospice Planning Horizon, published August 6, 2021

Note: All SA 9C programs, except Palm Beach Hospice of MorseLife serve adjacent service area(s).

**Each** co-batched applicant offers additional argument in support of need for their respective project. The co-batched applicant’s major need justification(s) are briefly described below.

**Affinity Care of Palm Beach LLC (CON application #10698)** states the following seven strategic initiatives to be implemented into the proposed project (repeated on pages 6, 27 and 189 of the application):

1. Initiative in The Glades to Enhance Hospice Utilization
2. Enhance Hospice Utilization Amongst Hispanic and Black Minority Groups (including in The Glades)
3. Outreach to the Jewish Community through Collaboration with Rales Jewish Family Services, The Wisdom Circle and Other Organizations
4. Collaboration with Senior Primary Care Clinics to Elevate Hospice Utilization Amongst Seniors
5. Develop and Initiate a Community Paramedic Program with Local EMS to Reduce Unnecessary Trips to the Emergency Room
6. Dedicated Hospice Inpatient Units at Nursing Homes
7. Detailed Program and Outreach to Enhance Hospice Utilization for Dementia and Alzheimer’s Disease

Affinity provides a map depicting Palm Beach County SNFs and ALFs, showing the 20 SNFs that support the proposed project and the remaining 36 SNFs in the county. The reviewer notes that the facilities indicated in the map appear to be evenly spread throughout the eastern portion of Palm Beach County with one facility marked in red being toward the extreme western portion of the county near Lake Okeechobee.

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The applicant includes Florida Office of Vital Statistics CY 2019 data in three tables on pages 24-26 of the application that address Palm Beach County resident deaths by cause:

- Ages 65+ and All Ages
  - Percent of Total Deaths
    - Ages 65+ and All Ages
- All Ages
  - Total Deaths, including
    - Black Deaths
      - Percent of Total Black Deaths
    - Hispanic Deaths
      - Percent of Total Hispanic Deaths
      - Ages 65+ and All Ages
- Ages 65+
  - Total Deaths, including
    - Black Deaths
      - Percent of Total Black Deaths
    - Hispanic Deaths
      - Percent of Total Hispanic Deaths

Below is a summary of some conclusions Affinity emphasizes based on the three referenced tables:

- More than 40 percent (4,793 deaths) of all seniors (residents age 65+) in the area died from cardiovascular related illness, followed by 21.4 percent (2,555 deaths) of all seniors (residents age 65+) in the area died from cancer
- An estimated 20 percent of the 14,839 total Palm Beach County deaths (all ages) were among minority groups (a total of 1,627 Black deaths and a total of 1,261 Hispanic deaths). The reviewer notes that this calculation is determined as follows:  
(1,627+1,261)/14,839=19.46 percent)
- An estimated 15 percent of the 11,943 total Palm Beach County age 65+ deaths were among minority groups (a total of 950 age 65+ Black deaths and a total of 840 Hispanic age 65+ deaths). The reviewer notes that this calculation is determined as follows:  
(950+840)/11,943=14.99 percent)

Affinity explains that for all seniors, including Black and Hispanic cohorts, cardiovascular disease, cancers and other respiratory diseases were the top four causes of death in 2019, followed by nervous system diseases.

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Concerning an initiative in The Glades to enhance hospice utilization, the applicant cites a variety of sources including Claritas/Environics, NHA Analysis, AHCA Inpatient Database and Medicare Claims in providing the following tables in the application:

- The Glades/2021 Population Estimates (page 29)
- The Glades and Palm Beach County/2021 Population Estimates by Race/Ethnicity (page 30)
- Lakeside Medical Center/Percent of Discharges by Race/Ethnicity/CYs 2018-2020 (page 31)
- Black Discharges and Hispanic Discharges to Hospice as Percent of Total Hospice Discharges - 3-Year Average 2018 to 2020 (pages 32 and 33)
- Lakeside Medical Center Hospice Timing of Expired Patients/Q2-2020 Through Q1-2021 (page 34)

To address hospice gaps in The Glades, Affinity bullets some of its Schedule C conditions on page 40 of the application.

Concerning enhancing hospice utilization amongst Hispanic and Black minority groups including The Glades area, Affinity uses Department of Elder Affairs, Office of Vital Statistics and NHA Analysis 2020 hospice admissions data and 2020 provisional deaths in providing the following tables in the application:

- SA 9C Hospice Penetration Rate, Hispanic vs. White/Non-Hispanic (page 43)
- SA 9C Hospice Penetration Rate, Black vs. White/Non-Hispanic (page 44)

Based on the two above-referenced tables, Affinity Care cites the following conclusions:

- The white/non-Hispanic cohort has a hospice penetration rate more than 44 points greater than their Hispanic counterpart in SA 9C
  - Hispanic hospice admissions (448) only represent 3.8 percent of all SA 9C hospice admissions even though Hispanics represent more than 10.3 percent of SA 9C deaths during the same time period
- The white/non-Hispanic cohort has a hospice penetration rate more than 43 points greater than their Black counterpart in SA 9C
  - Black hospice admissions (580) only represent 4.9 percent of all SA 9C hospice admissions even though Black residents represent more than 12.8 percent of SA 9C deaths

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Affinity Care states studies indicate that there are five primary reasons why African Americans are less likely to choose hospice:

1. African Americans have a deeply rooted distrust of the health care system
2. Lower economic status and resources
3. A greater willingness to spend their resources to stay alive
4. Lower care satisfaction among family members
5. End-of-Life care is in disarray

Affinity provides narrative description of affiliate experience with enhancing hospice penetration among minority groups, including The Oakland Program, Alameda County, California (Black) and the OLE Partnership (Hispanic), and other Affinity/Continuum outreach activities on pages 46-51 of the application. To address hospice gaps among Black and Hispanic residents, including in The Glades, Affinity bullets some of its Schedule C conditions (pages 51 and 52 of the application).

Concerning outreach to the Jewish Community through collaboration with Rales Jewish Family Services, The Wisdom Circle and other organizations, Affinity Care cites [Berman Jewish DataBank](#) data indicates that in 2018, there were 301,200 Jewish residents in Palm Beach County and a small portion of south Martin County, living in 147,000 households and that there were more than 117,000 Jewish seniors in Palm Beach County. Affinity contends that while the Jewish population accounts for approximately 20 percent of the Palm Beach County total population, the age 65+ Jewish population in the area accounts for approximately one-third of the Palm Beach County population. The applicant cites its letters of support in the area from Jewish religious leaders (rabbis) and providers of services to the Jewish population and bullets some of its Schedule C conditions (pages 61 and 62 of the application).

Concerning collaboration with senior primary care clinics to elevate hospice utilization amongst seniors, Affinity care states plans to work together with Sanitas Medical Centers, Conviva Care Centers and an area Federally Qualified Health Center (FQHC) such as FoundCare Health Center. Sanitas Medical Centers has five senior primary care clinics in Palm Beach County. Affinity Care states that Sanitas' patient population is primarily of Hispanic/Latino descent. Affinity Care also indicates that Conviva Care Centers has 24 locations in Palm Beach County and the FQHC FoundCare Health Center has in four locations in Palm Beach County. The locations of these facilities were listed and Affinity bullets some of its Schedule C conditions (page 66 of the application).

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Concerning plans to develop and initiate a community paramedic program with local EMS to reduce unnecessary trips to the emergency room, Affinity indicates that this is a relatively new initiative and an emerging concept, a collaboration between EMS and the hospice provider. The applicant points out that 911 calls are often uncoordinated for hospice patients and is not beneficial for the hospice patients, the hospice provider, EMS or the hospice if the patient is a readmission within 30 days. Affinity Care states the source as The Advisory Board Company to provide three diagrams (pages 68-70 of the application) to show a visual depiction of the process that takes place when a hospice patient's condition suddenly changes or deteriorates. The applicant cites four undesired consequences of this pathway. Affinity's initiative is stated to be a collaborative partnership between hospice and EMS to support that patient and family in the home setting, averting unnecessary transports to the emergency department.

Affinity Care lists a total of 13 Palm Beach County EMS agencies and cites its Schedule C conditions concerning collaboration with EMS.

Concerning dedicated hospice inpatient units at nursing homes, Affinity's care delivery is briefly described in items B and item E.2.a.(2) of this report and is not repeated here. The applicant indicates that the inpatient care component will be provided through contractual arrangements with both Palm Beach County SNFs and hospitals.

Concerning a detailed program and outreach to enhance utilization for dementia and Alzheimer's Disease, Affinity discusses nationwide data concerning Alzheimer's through the 2021 Alzheimer's Disease Facts and Figures, Alzheimer's Association. Specific to race and ethnicity, Affinity cites an October 2020 Alzheimer's Association study pertaining to the impact of race or ethnicity on hospice quality of care. Some of the study conclusions cited below include:

- Half of Black Americans and 33 percent of Hispanic Americans report having experienced discrimination when seeking health care
- 66 percent of Black Americans and 39 percent of Hispanic Americans believe that their own race/ethnicity makes it harder to get care for Alzheimer's and other dementias
- Minorities feel not being listened to because of their race/ethnicity

The reviewer notes that the stated survey(s) and conclusions do not appear to be necessarily specific to Palm Beach County residents per se, but broadly address minority groups nationally. Alzheimer's and dementia initiatives in hospice care are cited and Affinity bullets some of its Schedule C conditions on page 79 of the application.

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Affinity Care broadly describes its unique program services and differentiating features, including specialty clinical programs and minority outreach, a commitment to quality services, the interdisciplinary teach approach, along with the Continuum Care's response to COVID-19 on the application's pages 80-108.

Regarding service intensity, Affinity Care states the use of Trella Health, Medicare Claims Data, Q1-2019-Q4-2020, and Affinity Health Management for 12/1/2020-9/30/2-21 to show four separate bar charts applicable to Palm Beach County providers vs. Continuum Florida experience and Florida CY 2019 and 2020 as it relates to:

- Average Registered Nurse Visits – Last Seven Days (page 81)
- Average Social Work Visits – Last Seven Days (page 82)
- Average Registered Nurse Visits – Last Three Days (page 83)
- Average Social Work Visits – Last Three Days (page 84)

The reviewer notes that per Affinity Care, the average visits (by Continuum hospice providers in Broward and Sarasota Counties), for each of the referenced bar charts, is greater than that of Palm Beach County providers and the following two average visits compared to the state average:

- Average Registered Nurse Visits – Last Seven Days (page 81)
- Average Registered Nurse Visits – Last Three Days (page 83)

To address a commitment to provide service intensity, the applicant bullets some of its Schedule C conditions on page 85 of the application.

Specialty clinical programs described on the application's pages 86-93 include:

- Affinity Cardiac Care
- Affinity Pulmonary Care
- Music Therapy
- Virtual Reality Program
- Equine Therapy
- Veterans Programming

Affinity offers a narrative concerning the following in CON application #10698:

- Continuum Palliative Resources, listing seven specific benefits (page 96)
- Minority Outreach, listing four specific actions to address the hospice needs of Black and Hispanic residents of the area (page 98)

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CON application #10698 includes a diagram (page 103) of the way in which the Affinity/Continuum Interdisciplinary Team (IDT) members surround the patient in care. Affinity Care provides a review of Continuum Care’s response to COVID-19 on pages 104-108 of the application. Affinity Care provides an in-depth review of support for the project on pages 109-149 of the application. The applicant’s letters of support were briefly noted in item B of this report.

Affinity’s projected disease and age mix during the first two years is shown below. The All Ages Cohort Total line was added by the reviewer to confirm that the disease total line and the age cohort line match.

**Affinity Care of Palm Beach  
Admissions by Terminal Illness and Under/Over Age 65  
Years One and Two**

<b>Disease</b>	<b>Year One Admissions</b>	<b>Year Two Admissions</b>
Cancer	42	110
Cardiac	52	128
Respiratory	35	86
Renal Failure	25	61
Alzheimer’s/Dementia	9	23
HIV/AIDS	4	6
Other	21	48
<b>Total</b>	<b>188</b>	<b>462</b>
Under 65	19	23
Over 65	169	439
<b>All Ages Cohort Total</b>	<b>188</b>	<b>462</b>

Source: CON application #10698, pages 151 and 178

Affinity contends that when compared to the other co-batched applicants seeking a CON to establish a new hospice program in SA 9C, the Agency might want to consider its nine bulleted factors on pages 152 and 153 of the application and its other considerations for project approval.

**Brevard HMA Hospice, LLC (CON application #10699)** provides SA 9C population growth and population demographics tables which the reviewer has summarized below, regarding particularly the age 65+ population. The reviewer notes that Brevard does not offer a source for any of these tables:

- Page 61 of the application
  - Age Cohort Growth 2020-2030
  - Total Population Growth by Age/2020-2030
    - Age 65+ (an increase of 95,7911 age 65+ residents)
    - Age 65+ (an increase of 27.53 percent age 65+ residents)



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- Total Population Growth by Age/2022-2027<sup>2</sup>
  - Age 65+ (an increase of 18,069 age 65+ residents)
  - Age 65+ (an increase of 4.9 percent age 65+ residents)
- Page 62 of the application (2022-2025)
  - Veteran Population<sup>3</sup>
  - Population by Race
  - Population by Ethnicity (Hispanic vs. Non-Hispanic)<sup>4</sup>

The reviewer notes the following from the applicant’s above referenced population growth/demographics tables:

- The applicant’s age 65+ resident increase of 18,069 (a 4.9 percent increase) from 2022 to 2027 does not agree arithmetically with the applicant’s total 2022 and 2027 population growth by age tables as CY 2022 is Marion and 2025 is Palm Beach County totals
- The applicant is estimating by 2025:
  - A total of 48,932 age 65+ veteran residents (representing 4.56 percent of all Florida veteran residents)
  - A total of 307,479 Black residents (all age cohorts) – representing 19.83 percent of all Palm Beach County residents
  - A total of 362,170 Hispanic residents (all age cohorts) – representing 23.26 percent of all Marion County residents

Brevard states that per Florida Health Charts (per 100,000 residents) in 2019, the following were the leading causes of death in Palm Beach County, with causes in Palm Beach County shaded and bolded if greater than that of the Florida cases (per 100,000 residents):

**2019 Leading Causes of Death  
Palm Beach County and Florida  
Per 100,000 Residents**

<b>County/ Area</b>	<b>Cardio-vascular</b>	<b>Cancer</b>	<b>CLRD</b>	<b>Stroke</b>	<b>Diabetes</b>	<b>Renal/ Nephritis</b>	<b>Injuries</b>	<b>Liver Disease</b>
Palm Beach	<b>265.4</b>	<b>220.1</b>	49.6	<b>80.4</b>	24.2	<b>16.3</b>	<b>69.5</b>	12.4
Florida	221.2	214.2	56.4	65.2	29	15	62	15

Source: CON application #10699, page 63

The applicant discusses the existing providers (page 64 of the application) and regarding utilization projections (page 65 of the application), the applicant year one and year two projections in 10 SAs among five existing Florida hospice providers – including the existing and competing/co-batched CON application #10702-MorseLife. Brevard comments that MorseLife was activated without a fixed need pool. As

<sup>2</sup> The CY 2022 population table is Marion County’s population data.

<sup>3</sup> The veteran population table cites “Marion” County, which appears to be a typographical error.

<sup>4</sup> This population table cites “Marion” County, which is a typographical error.

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previously indicated in item C of this report, MorseLife was licensed pursuant to ss. 408.036(3)(a), Florida Statutes and its project is not the usual hospice in that its market area is limited to less than the SA total.

The reviewer notes that CON application #10699 conditions, among others, to target the following populations/areas:

- The homeless
- A principal care delivery site at 4 Harvard Circle, #950, West Palm Beach, Florida 33409
- CON application #10699 states per the most recent HUD report for 2020, Palm Beach County had 523 homeless individuals and that this is 1.9 percent of Florida's total of 27,487-despite Palm Beach County representing only 1.69 percent of the total population of the State (page 74 of the application)
  - The reviewer notes that this same total of homeless residents (523) is indicated for Marion County and this same percentage (1.69 percent) is indicated as being the percentage of total Marion County residents compared to the total population of the State, per Brevard's CON application #10678
    - The Agency notes that it is not likely that the stated HUD report shows that both Palm Beach County and Marion County have the same number of homeless residents (523)
    - The Agency notes that both Palm Beach County's and Marion County's total populations do not each hold 1.69 percent of Florida's total population
- The proposed principal care delivery site is the same physical location, according to the Agency's FloridaHealthFinders.gov website, as Mederi Caretenders (a licensed, Medicare-certified and Joint Commission-accredited home health agency)
  - The applicant offers no data to indicate why this particular physical location will better target or better serve the unmet hospice need in the area than any other physical location in SA 9C, other than possibly the fact that Mederi Caretenders is LHC Group's sole home health agency in Palm Beach County, ZIP Code 33409

In estimating year one and year two admissions and patient days, Brevard states that Mederi Hospice (page 66 of the application):

- Assumed the death rate would remain constant as applied to the 2023 need projections
- Applied the statewide use rates for hospice as applied by AHCA for the January 2023 planning horizon

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The applicant states six other factors in considering the patient admission and patient days estimates and provides a table to show its conclusions on page 67 of the application. Brevard states a conservative estimate in year one and year two of the following total patient admissions and patient days with a 77 day ALOS for both years:

**Patient Admissions and Patient Days  
Years One and Two**

<b>Mederi Hospice</b>	<b>Patient Admissions</b>	<b>Patient Days (ALOS 77)</b>
Year One	243	16,417
Year Two	368	27,190

Source: CON application #10699, pages 67 and 94

**Catholic Hospice, Inc. (CON application #10700)** begins by discussing the fixed need pool (pages 44 and 45 of the application). Concerning demographic trends and expected growth in Palm Beach County, the applicant states the use of the Agency’s Florida Population Estimates and Projections by AHCA District 2015-2028, issued September 2021 and data for “July 1” to provide a total of five population estimates for Palm Beach County. Catholic Hospice emphasizes a large and growing age 65+ population in the area.

Concerning access to disease-specific care, Catholic Hospice states the use of the Agency’s Florida Need Projections for Hospice Programs (issued August 6, 2021 for the January 2023 hospice planning horizon, as well as the website [www.FLHealthCharts.com](http://www.FLHealthCharts.com), the Florida Department of Health Bureau of Vital Statistics and AHCA Inpatient Database 2017-2019, to provide a total of 10 tables. Some of the conclusions drawn from these tables include:

- Raw growth in deaths of Palm Beach residents is primarily in the non-cancer/age 65+ category/cohort (page 52 of the application)
- In 2019, the number one cause of death in Palm Beach County is heart disease (including heart failure and other progressive end-stage heart disease) – page 52 of the application
  - Catholic Hospice is experienced in providing high quality services for those with heart disease/end-stage heart disease (page 53 of the application)
- In 2019, the number two, three, five and seven causes of death in Palm Beach County were cancer, stroke, chronic lower respiratory disease and Alzheimer’s Disease (pages 52 and 53 of the application)
  - Catholic Hospice supports both cancer and non-cancer diagnoses (page 59 of the application)
  - Catholic Hospice can assist with many of the care challenges during late-stage Alzheimer’s (page 60 of the application)

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- Regarding chronic lower respiratory diseases, Catholic Hospice focuses on individual care plans managing dyspnea (shortness of breath) – page 61 of the application

Pertaining to ethnic community-specific care, Catholic Hospice bullets eight outreach activities for the Hispanic/Latinx community and bullets seven outreach activities for the African American community in areas that it already services. According to CON application #10700, these/similar activities will extend to the SA 9C.

Catholic Hospice utilizes the Florida Department of Health Bureau of Community Health Assessment to indicate the 2019 Palm Beach County Hispanic and Black or African American populations and the AHCA Inpatient Database CY 2017-2019 to indicate discharges to hospice in Palm Beach County. Some key features stated by the applicant regarding these two populations are (pages 7 and 8 of the application):

- Catholic Hospice employees are fluent in eight languages
- Approximately 23 percent of the Palm Beach population is Hispanic and 10 percent age 65+ fall into the Hispanic ethnic category
- Approximately 30 percent of the Palm Beach population is Black/Other, with 11 percent age 65+ fall into the Black/Other category
- There's usually a lack of knowledge about hospice in Hispanic/Latinx and African American communities
- Palm Beach Hispanic/Latinx and African American population cohorts have low utilization of hospice
- Catholic Hospice will dedicate a team to conduct outreach for ethnic-specific in Palm Beach County
- Catholic Hospice commit to providing programs for ethnic community-specific care

Regarding access for the homeless and low-income residents in the area, Catholic Hospice explains that Palm Beach County has the fifth largest homeless population in the state and that additionally, 12.2 percent of the population lives below the poverty level and has limited access to coordinated care, including end-of-life services (page 70 of the application).

Catholic Hospice bullets 35 members of the Palm Beach County Homeless and Housing Alliance (the Alliance) and also discusses the Palm Beach County Homeless Advisory Board. Catholic Hospice states it will develop a collaborative program with the Florida Department of Health-Palm Beach County, whose patients are typically

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socioeconomically disadvantaged to help these residents with advanced illness to navigate in the health care system and identify those patients who are medically eligible for hospice early in their disease process.

Regarding the homeless and low-income populations in Palm Beach County, the applicant cites the Florida Council on Homelessness 2020 Annual Report, the Palm Beach Alliance and US Census Bureau, 2019 American Community Survey (One Year Estimates) to provide four homeless/low-income population tables regarding Palm Beach County. The applicant bullets nine characteristics that address this population.

Regarding the veteran population in the area, Catholic Hospice states that Palm Beach County has the fourth largest veteran population and highest elderly population in Florida with more than 83,000 veterans residing in Palm Beach County, of whom approximately 65 percent are age 65+.

Regarding the veteran population in the area, Catholic Hospice states US Department of Veterans Affairs-National Center for Veterans Analysis and Statistics, Veteran Population Model 2018 and the US Census Bureau 2019 American Community Survey (1 Year Estimates) to provide three veteran population tables regarding Palm Beach County.

Catholic Hospice points out having Level 4 certification by We Honor Veterans and is currently pursuing Level 5 certification and will further develop a veteran's program in Palm Beach County.

Catholic Hospice further discusses the following under "Other Specialized Experience" (pages 80-100 of the application)

- Integrated Approach to the Continuum of Care
- Integration of Palliative Care and Hospice Care
- Ability to Enhance Access to Transportation
- Chaplaincy and Pastoral Care

Other discussions include (pages 100-110 of the application):

- Provide unique pediatric programming
- Enhance access to hospice and palliative care for the patient population with mental illnesses
- Increase access to professional community-based bereavement services
- Other specialized programs that will be implemented in Palm Beach County

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Regarding projected utilization, Catholic Hospice provides Figure 38-Projected Hospice Market Volume-Palm Beach County/2023-2025 on the application’s page 111. Catholic Hospice offers the following projected utilization (2023-2025):

**Catholic Hospice Palm Beach Program Projected Utilization  
Projected Years One-Three (2023-2025)**

	<b>2023</b>	<b>2024</b>	<b>2025</b>
Projected 9C Hospice Admissions	13,254	13,389	13,516
Catholic Hospice 9C Projected Market Share	7.0%	8.0%	10.0%
Catholic Hospice 9C Projected Hospice	928	1,071	1,352

Source: CON application #10700, page 111, Figure 39

The reviewer notes that the applicant’s year one through three (2023-2025) admissions and market share estimates are not consistent with CON application #10700, Schedule 10, which indicates that both issuance of license and initiation of service are to occur in April 2022.

Catholic Hospice responds to the Health Care Access Criteria on pages 122-124 of the application.

**Florida Hospice, LLC (CON application #10701)** summarizes 10 features/characteristics that it asserts best explain why its proposed project should be approved on the application’s pages 24-25. Florida Hospice comments that in addition to the fixed need pool there are other factors that support the need for an additional hospice in SA 9C. Some of these factors are addressed below.

Florida Hospice utilizes the Agency’s Florida Population Estimates and Projections by AHCA District 2015-2030, issued September 2021, to indicate that, in Palm Beach County:

- The age 65+ population is expected to increase from 360,852 (2021) to 411,435 (2026) – a 26.3 percent increase (page 26 of the application)

The applicant states that the Agency’s Florida Need Projections for Hospice Programs indicate that in Palm Beach County:

- From the January 2020 to the January 2023 planning horizon, the SA 9C projected hospice patients age 65+ is expected to increase from 2,393 (88.6 percent) to 11,000 (90.2 percent) – page 27 of the application

The applicant next discusses national utilization benchmarks of hospice services by age group and indicates that, extrapolating national trends to Florida and SA 9C, the applicant expects a growing need for additional hospice services in SA 9C.

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Next, Florida Hospice states the use of the Agency’s Florida Population Estimates and Projections by AHCA District 2015-2030, issued September 2021 and the US Census Bureau Quick Facts (V2019, July 1, 2019, to indicate 2021 SA 9C population estimates for Black/African American, Hispanic, Asian, American Indian/Alaskan Native. The reviewer notes that the applicant’s table (page 29 of the application) does not reflect any population growth estimates past 2021.

The applicant next states the use of the MedPac Report to Congress, Medicare Payment Policy, March 15, 2021 and MedPac analysis of data from the Common Medicare Enrollment file and hospice claims data from CMS to show that from 2010 to 2019, all race/ethnic groups, including whites, had increases in hospice usage, though the applicant points out wide variation in utilization between racial/ethnic groups. The reviewer notes that this data is national statistics that may or may not be reflective of circumstances in SA 9C (page 30 of the application).

Florida Hospice states the use of the US Census Bureau, Quick Facts (V2019), July 1, 2019 (stated to be the most recent data available from this source) to reflect the following socioeconomic characteristics in SA 9C compared to Florida overall.

**Selected Socioeconomic Characteristics of the Population**

	<b>Median Selected Monthly Owner Cost with a Mortgage 2015-2019</b>	<b>Median Selected Monthly Owner Cost without a Mortgage 2015-2019</b>	<b>Median Gross Rent</b>	<b>Median Household Income (in 2019\$) 2015-2019</b>	<b>% Persons Living in Poverty</b>	<b>% Persons Without Health Insurance Under Age 65</b>
SA 9C	\$1,816	\$685	\$1,398	\$63,299	11.4%	17.9%
Florida	\$1,513	\$505	\$1,175	\$55,660	12.7%	16.3%

Source: CON application #10701, page 31

Florida Hospice points out that Palm Beach County has higher housing costs and a higher percentage of persons without health insurance compared to Florida overall.

The applicant maintains that Residential Hospice has a proven track record of providing hospice services to hospice patients including the socioeconomically disadvantaged.

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Florida Hospice states that in an effort to identify unmet hospice needs in Palm Beach County, it accessed/analyzed recently and independently conducted community health needs assessments performed by the following area providers:

- Jupiter Medical Center (2019)
- Lakeside Medical Center (2019)
- Boca Raton Regional Medical Center (2018)

The applicant points out that the referenced community health needs assessments have identified similar underserved populations. The reviewer combines/collapses together each of the three stated community health needs assessments under the categories below:

- Uninsured
- Working Poor
- Migrant Community
- Low-Income Elderly
- Black or African American residents
- Hispanic residents
- Residents living in poverty-
  - At or below 100 percent FPL
  - At or below 200 percent FPL
- Homeless
- End-of-Life Issues

Florida Hospice LLC projects the following admissions and patient day totals for year one and year two.

**Florida Hospice, LLC  
Projected Utilization and Patient Days  
Years One & Two**

	<b>Year One</b>	<b>Year Two</b>
Admissions Totals	252*	462
Patient Day Totals	13,356	31,878

Source: CON application #10701, page 69

Note: \* CON application #10701, pages 58, 59 and 64 also indicate that this total is 252 but page 67 indicates that this total is 262.

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** states that MorseLife has a 38-year history in Palm Beach County and identifies the following Palm Beach County populations as those with unmet hospice needs (pages iv, x, 1-1, 1-27 and 2-11 of the application):

- Seniors age 65+, particularly the most frail and vulnerable – the elderly age 85+ living alone
- The Jewish community
- African Americans
- Hispanic/Haitians/Latinos



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- Low income and indigent, including the homeless
- Veterans
- LGBT community
- Residents living in the Glades Area (western portion of Palm Beach County)
- Those suffering from cardiovascular diseases, cancer, respiratory diseases and infectious diseases

MorseLife discusses the Agency's publication of hospice need (pages 1-3 and 1-4 of the application) and population demographics and dynamics (pages 1-5 to 1-21). Under this latter category, MorseLife provides narratives and figures/charts/diagrams/tables to address Palm Beach County's:

- Aging Population (pages 1-5 to 1-8)
  - The most frail (those age 85+) Palm Beach County residents total 66,183 persons (in 2021) and that this count will increase to 72,930 by 2026, according to Claritas
  - From 2018 to 2020, statewide, hospice patient days by service location has increased by private residence and has decrease by nursing homes and this highlights the need for the applicant to receive approval to expand its hospice service throughout all of SA 9C
- Jewish Population (pages 1-8 to 1-10)
  - Jewish individuals increased from 77,000 in 1987 to 166,700 Jewish persons in 2018 and from 28,550 Jewish households to 78,00 Jewish households for the same period, according to "What's Next for Jewish Palm Beach"/Brandeis University-2019
  - MorseLife bullets six significant data items from the "What's Next for Jewish Palm Beach" Report and emphasizes that MorseLife is an expert in caring for the Jewish community
- Race and Ethnic Minorities (pages 1-10 and 1-15)
  - African Americans total 291,127 residents (20.1 percent of the total) and Hispanics number 332,071 residents (or 22.9 percent of the total) in 2019, according to the Florida Estimates of Population/Bureau of Economic and Business Research (BEBR)/University of Florida
  - ZIP Codes having the highest percentages of minority populations (in 2021) are toward the western portion of the county with some of these ZIP Codes being near the MorseLife campus

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- Deaths among Black residents, as a percentage (compared to all deaths in the county) increased from 9.8 percent (in 2017) to 11.0 percent (in 2019) and deaths among Hispanic residents, as a percentage (compared to all deaths in the county) increased from 8.3 percent (in 2017) to 8.5 percent (in 2019), according to [www.FLHealthCharts.com](http://www.FLHealthCharts.com)
- Discharges to hospice were less likely for minorities than whites in 2019 and 2020, according to AHCA Hospital Discharge Data / page 1-14/Table 1-8 of the application
- MorseLife notes the county death service ratio by race/ethnicity among Medicare beneficiaries from 2011 to 2021, according to HealthPivots©, Health Planning and Development, LLC 2021, explaining that:
  - African American (Black) residents are not receiving hospice service at levels comparable to their Hispanic and white counterparts
  - Hispanics are underserved compared to whites
  - Service was decreasing for all residents in 2020
- Low Income and Indigent Populations (pages 1-15 to 1-20)
  - In 2020, 53,227 (22.2 percent) of age 65+ residents compared to the total population had an annual household income under \$25,000 and 105,591 (or 44.0 percent) of age 65+ residents compared to the total population total households) had an annual household income under \$50,000, according to Claritas
  - Other low income/indigent/homelessness is discussed indicating in 2020, the homeless (sheltered and unsheltered) number 1,510, up from 1,397, according to the Florida Council of Homelessness 2021 Annual Report
- Veterans
  - In 2021, the age 65+ veteran population was estimates at 50,890, 61.5 percent of the total 82,730 veteran population, according to [https://va.gov/vetdata/veteran\\_population.asp](https://va.gov/vetdata/veteran_population.asp)
  - Veterans comprise a significant number of seniors that will require hospice care
- LGBT
  - The Miami-Fort Lauderdale-West Palm Beach Metropolitan Area has a reported 4.2 percent of its population identifying as LGBTQ, according to LGBT Q Policy Spotlight
  - This population is less likely to have the support they need as they age and are less likely to seek long-term care
- Health Conditions/Leading Cause of Death
  - Per [www.FLHealthCharts.com](http://www.FLHealthCharts.com), in both 2019 and provisional for 2020, the five leading causes of death in Palm Beach

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County and in Florida overall were (ranked in descending order, highest to lowest)/ page 1-22/Tab 1-12:

- Cardiovascular Diseases
- Malignant Neoplasm (Cancer)
- External Causes
- Respiratory Diseases
- Nervous System Diseases
- Infectious Diseases ranked as 7<sup>th</sup> in 2019 but due to COVID-19, rose to a ranking of 3<sup>rd</sup> in 2020
- Per [www.FLhealthCharts.com](http://www.FLhealthCharts.com) (2020 provisional) and CMS Hospice Analytic File CY 2019 and 2020 compared to Florida overall, based on Medicare beneficiaries, Palm Beach County had lower hospice penetration rates:
  - In 2019 regarding:
    - Cardiovascular Disease
    - Malignant Neoplasm (Cancer)
    - Respiratory Diseases
  - In 2020 regarding:
    - Cardiovascular Disease
    - Malignant Neoplasm (Cancer)
    - Infectious Diseases
    - COVID-19

MorseLife cites its experience in caring for Palm Beach County residents for decades and states that the proposed project would allow it to expand to the rest of the county. The applicant estimates the following year one “new” admissions represent its incremental increase of 184 and year two “new” admissions of 427 based on the project’s CON approval.

**MorseLife Projected Hospice Admissions**

	<b>Cancer Under 65</b>	<b>Cancer 65+</b>	<b>Other Under 65</b>	<b>Other 65+</b>	<b>Total Admissions</b>
Projected Admissions 2022	18	78	18	253	366
Projected Admissions 2023	29	129	31	421	610
<i>MorseLife Current Admits (7/20-6/21)</i>	<i>0</i>	<i>15</i>	<i>0</i>	<i>168</i>	<i>183</i>
“New” Admissions-Year 1	18	63	18	85	<b>184</b>
“New” Admissions-Year 2	29	114	31	253	<b>427</b>

Source: CON application #10702, page 1-24, Table 1-15.

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** begins by discussing the Agency’s published need for a new hospice program in SA 9C on pages 15 and 16 of the application. In the remainder of this section of the application, Odyssey more specifically specifies that hospice need is directly associated with the following Palm Beach County populations:

- The growing elderly populations, particularly individuals who are age 75+

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- Minority populations, especially Hispanic residents and Spanish speaking individuals (but also French, Portuguese and German speakers)
- Individuals below or near the poverty line
- Homeless individuals
- Residents with end-stage heart disease

Specific to the growth elderly population, Odyssey states the Agency's Florida Population Estimates and Projections by AHCA District 2015-2030, issued September 2021, indicate that by 2030, the SA 9C's age 76+ population is expected to be 231,938, with this age cohort's 2020 to 2025 CAGR being 2.82 percent and from 2025 to 2030 this age cohorts CAGR being 2.81 percent (page 16, Table 3 of the application)

- The reviewer notes that the applicant's referenced table indicates these two CAGRs from the age 75+ population is greater than for any other age cohort in the applicant's table

Also relevant to age, the applicant provides on pages 17 and 18:

- Palm Beach County Resident Age Distribution (Figure 2)
- Service Area Impact of Shifting Age Distribution (Table 4)

Specific to gender, race, ethnicity and language, Odyssey uses the US Census Bureau, 2019 American Community Survey to provide the following service area population on pages 19 and 20:

- Ethnicity and Gender, 2019 (Table 5)
- English Language Ability-Age 5+ (Table 6)
  - Speak only English
  - Speak a language other English
- English Language Ability-Ages 5 to 64 and Age 65+ (Table 7)
  - Speak a Language other than English
  - Speak English less than "very well"

The reviewer notes that according to the applicant's tables, specific to the Palm Beach County population:

- 18.7 percent are Black or African American
- 22.4 percent are Hispanic
- For non-English speakers age 65+, about 36,500 speak English, about 33,000 speak another Indo-European language and about 9,300 speak and Asian or Pacific Island language
  - Most individuals who speak an Ind-European language other than Spanish are speakers of French, Portuguese and German
- About 5,000 residents speak either Yiddish or Hebrew

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Odyssey discusses population diversity and provides an excerpt of a December 2016 Palm Beach County Community Health Assessment in which diversity is stated on pages 20 and 21 of the application.

Specific to poverty, Odyssey cites the US Census Bureau, 2019 American Community Survey and Florida Council on Homelessness 2017-2019 Reports to provide the following two poverty estimate tables:

- Poverty Rate by Age Group (page 21, Table 8)
  - Age 18-64
  - Age 65+
  - Percent Below 200% of Poverty Line
  - Percent Below 300% of Poverty Line
- Homeless Population by Shelter and Veteran Status from 2017 to 2020 (page 22, Table 9)
  - Sheltered
  - Unsheltered
  - Homeless Veterans

The reviewer notes that according to the applicant's tables, characteristics of the Palm Beach County population include:

- Of residents age 65+, 9.8 percent are under the poverty line
- 29.8 percent of residents are below 200 percent of the poverty line
- 45.74 percent of resident are below 300 percent of the poverty line
- The total homeless ranged from 1,607 (in 2017) to 1,510 (in 2020)
- Homeless veterans ranged from 65 (in 2017) to 100 (in 2020)

Specific to health factors, Odyssey states the use of the Agency's Florida Need Projections for Hospice Programs, issued August 6, 2021 to indicate cancer and non-cancer admission totals for each existing SA 9C hospice provider. The applicant contends that:

- Data pertaining to Palm Beach Hospice of MorseLife is not likely representative of SA 9C hospice patient population due to its limitation to patients in non-profit residential care settings
- Odyssey estimates of the total 11,732 hospice admissions for the 12 months ending June 2021
  - About 3,142 admissions were diagnosed with cancer
  - 8,590 required hospice care for other diagnoses

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- By 2023, Odyssey estimates a total of 15,693 deaths and 11,732 total admissions, with a net need of 29 admissions/6.2 percent (due to cancer) and 438/93.8 percent (due to a non-cancer diagnosis) – with this totaling 467 expected SA 9C net need (cancer and on-cancer combined)
- By 2023, Odyssey estimates that SA 9C agencies will serve 92.5 percent of cancer-related deaths and about 70 percent of non-cancer related deaths

Odyssey indicates it utilized data it accessed on October 12, 2021 from <https://www.bebr.ufl.edu/population> for 2019 age-specific death rates by cause) and CY 2019 deaths from the Florida Department of Health, Office of Vital Statistics website to determine SA 9C estimates of CY 2020 deaths by diagnosis.

**SA 9C Agency Deaths by Diagnosis, 2020 Estimates**

	<b>SA 9C Total</b>	<b>SA 9C Percentage</b>
Cancer	3,269	21.7%
AIDS	46	0.3%
End-Stage Pulmonary	1,015	6.7%
End-Stage Renal	242	1.6%
End-Stage Heart	4,068	27.0%
Other	6,432	42.7%
<b>Total</b>	<b>15,071</b>	<b>100.0%</b>

Source: CON application #10703, page 24, Table 13 (partially reproduced)

Odyssey next states that use of the 2020 AHCA Hospice Demographics and Outcome Measures Annual Report to generate Table 14 on CON application #10703’s page 25. The reviewer notes that from this table, Odyssey estimates the following SA 9C distribution of admissions by diagnosis in 2020 among all SA 9C hospice providers as follows (shown strictly as percentages)

- Cancer (28.4 percent)
- HIV/AIDS (0.04 percent)
- End-Stage Pulmonary (9.6 percent)
- End-Stage Renal (1.7 percent)
- End-Stage Heart (22.5 percent)
- Other (37.7 percent)

Odyssey asserts that its Tables 13 and Table 14 (as indicated above), show the hospice use rate (at 73.1 percent) among individuals with heart disease is lower than other leading causes of death in SA 9C. Further, this indicates that most of the additional hospice need among Palm Beach County residents will occur for individuals with heart disease and other associated disease such as stroke.

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From the applicant’s response to rule preferences (see item E.2. of this report and the applicant’s Schedule 7A, the reviewer generates the following admissions/patient day estimates for year one and year two:

**Odyssey Healthcare of Marion County, LLC  
Projected Utilization and Patient Days  
Years One & Two**

	<b>Year One</b>	<b>Year Two</b>
Admissions Totals	244	462
Patient Day Totals	15,722	34,556

Source: CON application #10703, pages 36 and 37 and Schedule 7A

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704):** The five tables on pages 18 and 19 are duplicates of the applicable SA 9C portions on pages 14, 16-18 and 20 of the Agency’s Florida Need Projections for Hospice Programs, issued August 6, 2021 and revised on August 17, 2021. The applicant states being in agreement with the referenced SA 9C hospice need projection. The reviewer notes that these tables are duplicated on pages 28-29 of CON application #10704, and in the applicant’s response to item E.2.b.(1)(d).

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705):** The reviewer initially briefly described discrepancies concerning the applicant’s cataloging of letters of support (see item B of this report). While not an exhaustive listing of similar discrepancies, additional review of CON application #10705’s Book 1 master table of contents and the table of contents regarding each of the remaining two books reveals that:

- The Book 1 two-page master table of contents indicates a total of five sections and 35 exhibits, with the Exhibit 35-Audited Financial Statement/Funding Letter/Bank Account Report; however, Book 3 ends with Exhibit 34-Letters of Support (which there were none) and there is no Exhibit 35.
- Exhibit 13 in the Book 1 master table of contents is titled “Palliative Care Patient and Family Care Guide”; however, Book 2 has no Exhibit 13 and Book 3’s Exhibit 13 is the “PruittHealth Caring Hands Program”.
- The Book 1 master table of contents has Exhibit 14 titled as “Veteran Pin & and Pinning Ceremony Photographs/Veterans Recognition Program/We Honor Veterans”; however, Book 3’s Exhibit 14 is the “Helping Children with Life After Loss-Camp Cocoon”.

PruittHealth discusses and offers tables addressing the fixed need pool and SA 9C and statewide hospice penetration rates on the application’s pages 59-61.

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Concerning population growth and aging in SA 9C, PruittHealth utilizes the University of Florida Bureau of Economic and Research (UF BEBR), Bulletin 190, to indicate that, in SA 9C (page 63 of the application):

- The 85+ population grew by 23.4 percent from 2010 to 2020 representing 4.1 percent of the subdistrict population, with this same age cohort expected to increase by 21.1 percent from 2020 to 2030 (to become 4.6 percent of the subdistrict total population)

The 85+ age group is projected to have the 2<sup>nd</sup> highest growth in SA 9C from 2020 to 2030 (exceeded only the age 65-84 age cohort in the same time frame)

- The 65-84 population grew by 22.6 percent from 2010 to 2020 representing 19.7 percent of the subdistrict population, with this same age cohort expected to increase by 28.7 percent from 2020 to 2030 (to become 23.1 percent of the subdistrict total population)

The 65-84 age group is projected to have the highest group in SA 9C from 2020 to 2030 (with the 2<sup>nd</sup> highest age cohort being the 85+ population in the same time frame)

Concerning population demographics in SA 9C, PruittHealth again states use of the UF BEBR, Bulletin 190 to indicate that in Palm Beach County:

- White residents make up 51.2 percent of the total
- Black residents make up 20.2 percent of the total
- White residents make up 25.4 percent of the total
- The reviewer notes that white residents cannot make up both 51.2 percent and 25.4 percent of the total Palm Beach County population. However, the applicant's page 65, Figure 46 indicates that arithmetically, Hispanic residents make up 25.4 percent of the total population

PruittHealth provides the following Palm Beach County age 65+ deaths and percentage of death by race (provisionally in 2021):<sup>5</sup>

<sup>5</sup> Source: Per PruittHealth - <https://www.flhealthcharts.com/>



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<b>County</b>	<b>White</b>	<b>Black</b>	<b>Other</b>	<b>Total</b>
Palm Beach	9,456	1,058	210	10,724
<i>Percent of Deaths</i>	88.2%	9.9%	2.0%	100.0%

Source: CON application #10705, page 66, Figure 49

Regarding the homeless in SA 9C, PruittHealth states that according to the Florida Council on Homelessness, Annual Report of June 30, 2021:

- The homeless Point-in-Time count in 2020 was 1,510 (page 68, Figure 50 of the application)
- The homeless student count (2019-2020) was 4,500 (page 69, Figure 51 of the application)

Regarding those residents living under 185 percent of the Federal Poverty Level, PruittHealth offers a table (page 70, Figure 52 of the application) to reflect the 2019 family/household income thresholds that represent 100 percent and 185 percent of the Federal Poverty Level (by number of family members/households), according to the U.S. Department of Health and Human Services, Assistant Secretary for Planning and Evaluation website (the reviewer notes that the actual website is not indicated). PruittHealth indicates that Florida Health Charts data indicates that in 2015-2019, 27.6 percent of Palm Beach County residents were living under 185 percent of the Federal Poverty Level, compared to 31.1 percent of Florida’s population overall (page 70, Figure 53 of the application).

Regarding residents experiencing food insecurity, PruittHealth does not offer a source to confirm its stated percentages but indicates that 10.6 percent of Palm Beach County residents were food insecure in 2019 and that nearly one in five (15.7 percent) of children were food insecure during the same period. PruittHealth states that with the onset of COVID-19, financial and food insecurity have increased significantly.

Regarding elder residents living alone, PruittHealth states that:

- According to the Department of Elder Affairs (DOEA), 24.0 percent of Palm Beach County residents 60 and over live alone and that this population has special care needs at end-of-life
  - One goal of the 2022-2025 Florida State Plan on Aging is to “increase the resources and support available to caregivers of older adults”
- The most recent Community Health Assessment for Palm Beach County found the “elderly” were one of six groups that had unmet healthcare needs in the county (the applicant very briefly discusses companion care for this population)

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The reviewer notes that PruittHealth does not include the DOEA 2022-2025 Florida State Plan on Aging or the Community Health Assessment for Palm Beach County. The applicant also discusses arrangements to provide hospice services to hospice patients who are indigent/homeless. See the applicant's response to this issue in E.2.b. of this report.

Regarding veterans in Palm Beach County, PruittHealth provides the projected number of SA 9C veterans for each year from 2021-2030, with the projected veteran population in 2030 to be 72,127 (page 75, Figure 57 of the application). PruittHealth explains that though 2020 data is still considered provisional per FLHealthCHARTS.com, of the total CY 2020 Palm Beach County (17,223) resident deaths, 3,501 (20.3 percent) were veterans. Therefore, a significant number of the service area's deaths are veterans. PruittHealth next offers narratives and other descriptions of PruittHealth's hospice services targeted to veterans:

- History Serving Veterans
- Recognition Program
- We Honor Veterans
- Last Patrol
- Management Contracts (in the states of Georgia and North Carolina)

Regarding PruittHealth's enhancement of access to disease-specific programs in consideration of deaths by type of illness in Palm Beach County, the applicant provides a table (page 80, Figure 62 of the application) that indicates in CY 2019, the following were the eight leading (highest to lowest) causes of death in Palm Beach County: Heart, Cancer, Stroke, Injury, COPD, Diabetes, Alzheimer's and Nephritis. The applicant also indicates death rates per 100,000 residents, for these same eight causes of death, for SA 9C and for Florida overall, for CY 2019. PruittHealth stresses that results worth noting are that the top four Palm Beach County causes of death rates per 100,000 population are higher than the same terminal illnesses when compared to the Florida rates per 100,000 cases. Excluding injury, these four highest causes of death (per 100,000 residents when compared to the state overall per 100,000 residents), most to least, were:

- Heart (1.2 times above FL rate)
- Stroke (1.2 times above FL rate)
- Cancer (1.0 times above FL rate)
- Nephritis (1.0 times above FL rate)

PruittHealth explains that the following specific disease programs - PruittHealth Pathways used at its hospice programs will be utilized in SA 9C:

- Oncology Program

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- Cardiac Program
- Pulmonary Disease Program (including a respiratory therapy program)
- Stroke Program
- Alzheimer’s/Dementia Program
- End Stage Liver Disease
- End Stage Renal Disease

PruittHealth Pathways were described in detail on pages 81-85 of the application. The applicant’s projected admissions, average length of stay (ALOS) and patient days for year one and year two, are shown below.

**PruittHealth Hospice – Southeast Florida, LLC  
Projected Utilization**

	<b>Year One</b>	<b>Year Two</b>
Admissions	140	327
ALOS	59.5	66.6
Patient Days	8,330	21,777

Source: CON application #10705, page 86, Figure 64

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706):** The reviewer summarizes the major populations in SA 9C that Seasons identifies as experiencing unmet hospice needs or barriers to hospice care, which Seasons describes in this section and lists in its response to items E.2.a.(1) and E.3.a. of this report. Seasons begins by providing a full-page diagram titled, “Seasons Has Tailored Its Hospice Program to 9C” (pages 4 and 89 of the application).

Seasons bullets seven populations in SA 9C that the applicant indicates were identified as vulnerable populations as determined through Seasons own community-oriented needs assessment (pages 20-21 of the application). The applicant provides a table on page 63 of the application that reflects Seasons’ stated Palm Beach County Community Needs Assessment list of organizations contacted by type and the total number of each organization/entity/person contacted (a cumulative total of 63 contacts).

Seasons briefly discusses that the Agency published a net need of 463 additional patients to be served (in SA 9C) in 2023 and additionally, briefly discusses existing hospice providers in SA 9C.

The applicant provides a table to indicate the expected SA 9C age 65+ population growth from 2021 to 2026 (page 30 of the application).

Seasons provides a 2019 map (CON application #10706, page 32, “Department of Elder Affairs-Elderly Needs Index, Palm Beach County Area”), indicating that the Department of Elder Affairs developed an

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Elder Needs Index (ENI), to identify concentrations of vulnerable elders. Seasons states it has developed targeted programming and initiatives to improve access, pursuant to results of the DOEA ENI in Palm Beach County. Particularly, bilingual and outreach programs are discussed.

Seasons discusses its proposed hospice office locations, in or near Belle Glade and in Riviera Beach, Florida and provides a map on page 36 of the application, titled “Percent of Hospital Patients 65+ Discharged to Hospice, by Patient Zip Code” based on the AHCA Inpatient Discharge Database for CY 2020. Seasons maintains that this map indicates that residents of western Palm Beach County and the Riviera Beach area are discharged to hospice at a lower rate than other areas of the county. Seasons explains that CON application #10706, Schedule C, Condition #6 will provide:

- Geographic access to all areas of Palm Beach County
- All populated areas being within a 60-minute drive for at least one of the two proposed hospice offices

Seasons emphasizes that there are no licensed hospice offices within 30 minutes of Belle Glade (CON application #10706, page 38, “30-Minute Drive Contour from Belle Glade to Existing 9C Licensed Hospice Offices”). Further, Lakeside Medical Center is only hospital serving the Glades in the western portion of the county.

Seasons emphasizes that per the AHCA Inpatient Discharge Database for CY 2020, Lakeside Medical Center had the lowest number and lowest percentage of age 65+ resident discharges to hospice compared to any other hospital in Palm Beach County at 2.6 percent with only 12 of 462 patient age 65+ discharges were to hospice. Seasons also contends that the Medicare Hospital Standard Analytical File and Medicare Beneficiary Summary File 2019 reinforces this, showing that, in 2019, Medicare beneficiaries discharged from Lakeside Medical Center were far less likely to receive hospice care the year of their death than Medicare patients at hospitals “in the eastern portion of the state”. Further, 2019 Medicare decedents who received care at the only Belle Glade-area SNF received hospice care at a much lower rate (50 percent) than the Palm Beach County average across all nursing homes (72 percent).

See item E.2.a.(2) of this report, for a listing of Glades area/extreme western Palm Beach County hospitals and/or SNFs that expressed an interest in entering into a contractual agreement with the applicant concerning the provision of the inpatient hospice component. Seasons cites United States Census, 2020 Census Demographic Data Map Viewer to provide a map titled “Percent of Census Trac Population That is Hispanic or Latino, 2020”), which indicates that a majority or

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residents in the Glades, and a large percentage in western Palm Beach County, are Hispanic. Seasons discusses applicable conditions to address the needs of this population (CON application #10706, Schedule C, Condition #s 6 and 7).

Seasons references sources such as The United Way of Palm Beach County, DOEA and the *Sun Sentinel* to explain that food insecurity among seniors is growing in Palm Beach County. Seasons also references sources such as the 2013-2017 American Community Survey, the National Institute on Aging, the National Academies of Sciences, Engineering and Medicine and the Centers for Disease Control and Prevention to discuss statistics on older residents living alone in Palm Beach County and ill health outcomes associated with loneliness and with the elderly living alone (pages 44-46). Seasons reiterates its Schedule C, Conditions numbers 1-4.

Seasons explains that according to the Brandeis University, 2018, Greater Palm Beaches Jewish Community Study, commissioned by The Jewish Federation of Palm Beach County, residents living in Jewish households in the area has risen from 77,000 in 1987 to 166,700 in 2018. To address the hospice needs of the Jewish population in the area, Seasons reiterates its Schedule C, conditions numbers 12 and 13.

Seasons uses the University of North Carolina Health Literacy Data Map to provide a map (CON application #10706, page 51, "Health Literacy Levels, Palm Beach County Area"), which indicates that many residents in the area, including those in Belle Glade and the Riviera Beach area, have a "basic" or a "below basic" health literacy skill level. The applicant explains that this can present challenges when making health care decisions, especially at the end of life. Seasons indicates its plans to address these challenges and references its Schedule C, Condition #9.

Seasons cites the Palm Beach County Community Services, Homeless and Housing Alliance 2020 Point-in-Time Count to indicate 1,030 unsheltered persons experiencing homelessness in Palm Beach County and an additional 480 persons in emergency shelters or transitional housing, 181 were seniors experiencing homelessness, 158 of whom were unsheltered. Seasons reiterates its Schedule C, Condition #10.

Seasons cites its Schedule C, Condition #31 and states that according to FLHealthCharts.com, among the age 65+ population in Palm Beach County in 2020:

- There were 52,569 probably Alzheimer's cases
- Probably Alzheimer's cases accounted for 4.7 percent of the county's elderly population

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- Palm Beach County has the highest percentage of elderly residents with likely Alzheimer's of any Florida county

Seasons comments that in 2020, 22 percent of Floridians age 65+ died from heart disease and that in Palm Beach County, the rate was even higher at 26 percent. The applicant describes its Cardiac Care Program and AICD Deactivation Programs (pages 58-60 of the application). Seasons references its Schedule C, Condition numbers 24 and 25.

Seasons offers narrative about residents with opioid use disorder, stating that Palm Beach County's synthetic opioid death rate is nearly twice the state average. Seasons explains the racial and ethnic diversity in its Cultural Inclusion Council which is Schedule C's condition number 5.

Seasons offers narrative and data regarding pediatric hospice patients and grieving children on pages 64-68 of the application, indicating that according to FLHealthCharts.com, 132 children ages 0-19 died in Palm Beach County in 2020. Seasons emphasizes that no hospice providers in SA 9C offers a pediatric program.

Seasons states using AHCA Hospice Demographic Data for its assumptions in estimating a hospice use rate for patients under 18. The reviewer only partially reproduces this table, listing only the estimated SA 9C and state totals. See the table below.

	<b>Ages 0-18 Reported Admissions</b>	<b>Ages 0-18 Assumed Admissions</b>	<b>Total Admissions All Ages</b>	<b>Percent of Total Admissions 0-18</b>
9C Total	--	87	22,924	0.4%
Florida	--	759	152,323	0.5%

Source: CON application #10706, page 65, partially reproduced

Seasons comments that although there are few pediatric admissions, the applicant will provide these patients and their families the highest quality of care. Seasons also comments that pediatric hospice is a specialty. Seasons provides additional narrative about its pediatric hospice care:

- Partners in Care: Together for Kids (PIC:TFK)
- Kangaroo Kids
- Certified Child Life Specialist
- Camp Kangaroo

These four pediatric special services are primarily reiterations of Schedule C, Condition numbers 14-17.

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Seasons next addresses the hospice needs of Palm Beach County's LGBTQ+ population, explaining that while it is difficult to estimate the number of LGBTQ+ residents in any area, "...the available data indicate there is a large LGBTQ+ population in Palm Beach County". Seasons uses UCLA School of Law William Institute data and an April 10, 2019 *South Florida Sun Sentinel* article to conclude that Palm Beach County is home to 3,467 same-sex couples, the fifth highest of any Florida county and that West Palm Beach was ranked among the friendliest cities for LGBTQ+ retirees in 2019. Seasons states its plans to reduce barriers to hospice care for SA 9C's LGBTQ+ residents on pages 70-71 of the application.

Seasons projects year one total admissions of 187 (12,155 patient days) and year two total admissions of 408 (26,520 patient days).

**Suncrest Hospice Florida, LLC (CON application #10707):** The reviewer notes that CON application #10707, Table of Contents reads in part, E.1. Fixed Need Pool, page 64 and E.2. Agency Rule Preferences, page 64. Therefore, the reviewer relocates CON application #10707, pages 2-63, to this section of the report.

Suncrest Hospice Florida, LLC makes multiple references to identifying/capturing unmet hospice needs in Palm Beach County through the Palm Beach County Health Improvement Plan, June 2017-June 2022 and the Palm Beach County Community Health Plan, June 2017-2022 (which the applicant also references the Palm Beach County Health Plan). The reviewer notes that CON application #10707 does not include a copy the referenced plan(s) for Agency review. However, the reviewer conducted a Google search, which revealed the website [PALM BEACH COUNTY COMMUNITY HEALTH IMPROVEMENT PLAN \(floridahealth.gov\)](https://www.floridahealth.gov/plans-and-programs/community-health-improvement-plans/palm-beach-county-community-health-improvement-plan-june-2017-june-2022-revised-june-2021). This website shows the Palm Beach County Community Health Improvement Plan/June 2017-June2022 (Revised June 2021). The reviewer notes that the first paragraph of the referenced plan's executive summary reads:

"The Florida Department of Health in Palm Beach County conducts the Community Health Assessment (CHA) and Community Health Improvement Plan (CHIP) process to make meaningful improvements in community health. In 2016, the Health Care District of Palm Beach County (HCD) and the Florida Department of Health in Palm Beach County (DOH-PBC) enlisted the Health Council of Southeast Florida (HCSEF) to facilitate a comprehensive CHA and CHIP."

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Regarding the project's program overview on pages 3-8 of the application, Schedule C has conditions under the following headings:

- C.1. Special Site within Service Area 9C
- C.3. Special Programs

Concerning opening in new markets (pages 15 and 16 of the application), Suncrest Hospice Florida, LLC offers the bulleted "Suncrest Approach" and provides a narrative for each of the following:

- Pre-licensure
- Post-licensure
- Hiring
- Patient Admission/CHAP Accreditation

Suncrest Florida cites Medicare claims data and the Palm Beach County Health Plan (referenced earlier) to generate tables and charts on pages 19-22 of the application. These include:

- Comparison of Patient Access to Hospice Services in Belle Glade vs. Wealthiest Communities in Palm Beach County (2020) – Table 2
  - Belle Glade vs. Wealthiest Communities Hospice Patient Distribution – Chart 1
- Comparison of Patient Access to Hospice Services in Pahokee vs. Wealthiest Communities in Palm Beach County (2020) – Table 3
  - Pahokee vs. Wealthiest Communities Hospice Patient Distribution – Chart 2

The applicant concludes that the wealthier Palm Beach County residents receive a disproportionately greater share of the overall hospice care and that this is an inequity that needs attention.

Suncrest Florida states the use of United States Census Data (accessed October 22, 2021 and Trella Special Data Analysis of CMS Data Quarter 1 2020 through Quarter 1 2021/Reported 10/21/21, to generate a chart (page 24 of the application):

- Comparison of Minority Percentage in Palm Beach County Compared to Percentage of Minority Population Served by Hospice and Variance-Chart 3

The applicant contends that this chart shows that of total Palm Beach County residents:

- Asians make up three percent of the total population but represent 0 percent of hospice patients
- Blacks make up 19 percent of the total population but represent 10 percent of hospice patients



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- Hispanics make up 23 percent of the total population but represent four percent of hospice patients
- Whites make up 54 percent of the total population but represent 83 percent of hospice patients

The applicant points out that ethnic/racial groups are significantly underserved across the county and whites are served at a proportionately higher rate. Further, the applicant points out that this disparity is found across all four hospice providers in SA 9C (see CON application #10707, page 25, Table 4).

Suncrest Florida comments that to address the referenced disparities/underservice, it will extend its outreach to minority populations throughout Palm Beach County, regardless of the wealth or poverty level of the area, will tailor interventions and will provide culturally competent care. Suncrest describes some previously successful interventions on the pages 37 and 38 of the application.

Suncrest discusses partnerships with area organizations, support for CNA students from Belle Glade, Pahokee and other low-income minority communities, and the promotion of its own hospice staff diversity to address these disparities on pages 27-29 of the application.

Suncrest Florida states the use of Trella Marketscape for Hospice, to generate two charts, for the June 30, 2019-June 30, 2020 time frame, for the existing SA 9C hospice providers and its parent's hospice programs, by hospice team staff discipline on pages 40 and 42 of the application:

- Average Visits-Last Seven Days (Chart 4)
- Average Visits-Last Three Days (Chart 5)

Suncrest Florida stresses that the last week of life is typically the period in the terminal illness trajectory with the highest symptom burden and that hospice care is most critical in the last seven days of life. Based on the referenced charts, Suncrest Florida asserts that the parent's staff RNs, social workers and aides average a higher number of patient visits than any of the existing SA 9C hospice providers. The applicant contends that the parent's higher percentage of hospice staff visits to patients helps to improve the experience of care as well as reduce the community cost of care by providing "the right care at the right time". Suncrest Florida provides excerpts of letters of support to corroborate the visitation inadequacies in SA 9C on pages 43-45 of the application.

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To address this stated visitation inadequacy, Suncrest Florida reiterates its STARS Program (see applicant’s Schedule C, C.3. Special Programs/Condition #1-bullet #7).

Suncrest Florida states having used the following two sources to generate to generate the table below, reflecting (in Palm Beach County) the 10 leading causes of death in the general population and specifically for Blacks and Hispanics:

- Healthcharts.com Mortality Atlas Leading Causes of Death in Florida Counties
- CDC National Center of Health Stats for the State of Florida 2017

**Major Causes of Death**

No.	All	Blacks	Hispanics
1	Heart Disease	Coronary Artery Disease	Heart Disease
2	Cancer	Stroke	Cancer
3	Stroke	CHF	Unintentional Injury
4	Unintentional Injury	Cancer	Stroke
5	Chronic Lower Respiratory Ds.	Lung Cancer	Chronic Lung Disease
6	Alzheimer’s Disease	Colorectal Cancer	Suicide
7	Diabetes Mellitus	Breast Cancer	Diabetes Mellitus
8	Suicide	Prostate Cancer	Alzheimer’s Disease
9	Nephritis, Nephrosis, Neph+	Cervical Cancer	Chronic Liver Disease
10	Chronic Liver Disease	Diabetes Mellitus	Kidney Disease

Source: CON application #10707, page 51, Table 11

Suncrest Florida plans for addressing leading causes of death in SA 9C (pages 51-63 of the application) and reiterates its Schedule C.3. Special Programs/Condition #4-Disease Specific Programs in Palm Beach County.

Suncrest Florida projects 156 admissions (8,001 patient days) in year one and 570 admissions (47,693 patient days) in year two of operations.

**Transitions Intermediate Holdings, LLC (CON application #10708)** provides a brief discussion of the fixed need pool and applicant contends that CON application #10708 is submitted in response to the special circumstances provision of the applicable hospice rules in order to demonstrate additional grounds for approval of a new hospice program (page 49 of the application). The applicant directs the Agency to its response to item E.2. (Rule Preferences) in this report.

Transitions contends that this proposed hospice program should be approved for the following reasons:

- Above and beyond clinical care model including:
  - 24/7/365 availability
  - Comprehensive IDG care team

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- Extensive ancillary services including but not limited to End-of-Life Doula support, music and massage therapy, animal visits, and more
- Vigil sitting commitments
- Palliative-to-hospice connection
- Extensive software integration
- Remote patient monitoring
- Exceeding national standards, receiving a 4.5 Star Rating
- Hospice and palliative operations in MI, IL, IN, and PA
- Access to Routine, Respite, Continuous and In-Patient care in either the home or a care facility

Transitions maintains that engaging with patients early in their care journey leads to more appropriate hospice conversions and usage, as well as longer lengths of stay for hospice appropriate patients.

CON application #10708 states that, “The total spend on cancer related hospital stays has increased 36% in district 3 between 2014 and 2018.” The reviewer notes that in this same batching cycle, this is the same stated increase percentage and same time frame for the applicant’s CON application #10683 submitted regarding Marion County.

Transitions does not provide a source but offers exhibits regarding data from 2014 to 2018 as follows on pages 51 and 52 of the application:

- Exhibit 19-Palm Beach County Medicare and Hospice Usage:
  - Increases in Palm Beach County Medicare beneficiaries and corresponding annual increase in Palm Beach County hospice users (from 2014 to 2017) but a slight decrease from 2017 to 2018
- Exhibit 20-District 9 Median Charge for Hospice Stay:
  - A 28 percent increase (from \$65,607 to \$84,085)
- Exhibit 21-District 9 Number of Hospitalizations
  - Indicating a low in 2014 of 4,226 and a high in 2016 of 5,316

The applicant explains that in order to reduce the financial burden on patients and their families, care services that aim to reduce the number and acuity of hospital stays are needed.

Transitions Intermediate Holdings, LLC projects 50 admissions (14,250 patient days) in year one and 100 admissions (39,434 patient days) in year two of operations.

**2. Agency Rule Criteria and Preferences**

The applicants discuss hospice licensure standards in Rule 59A-38 Florida Administrative Code, demonstrating their understanding of these standards.

**a. Rule 59C-1.0355(4)(e) Florida Administrative Code. - Preferences for a New Hospice Program. The Agency shall give preference to an applicant meeting one or more of the criteria specified in the below listed subparagraphs:**

**(1) Preference shall be given to an applicant who has a commitment to serve populations with unmet needs.**

**Each** co-batched applicant is responding to published need for an additional hospice program for the January 2023 planning horizon and all discuss serving populations they believe to be underserved or otherwise in need of target population hospice services. **Each** co-batched applicant's response to major population(s) with unmet need are briefly described below.

**Affinity Care of Palm Beach LLC (CON application #10698)** references its response to item E.1.a. of this report.

**Brevard HMA Hospice, LLC (CON application #10699)** states targeting the following services and/or populations currently realizing unmet need in hospice care on pages 73-78 of the application:

- Palliative care
- Patients without primary care givers
- Homeless
- Veterans
- Minority populations (Black residents and the Latino/Hispanic community)<sup>6</sup>

**Catholic Hospice, Inc. (CON application #10700)** maintains that the following summarizes the need for the proposed project:

- Demographic trends and expected growth
- Access and availability of hospice services
- Enhance access to disease-specific care
- Enhance access to ethnic community-specific care
- Enhance access to homeless and low-income population
- Enhance access to the veteran population

<sup>6</sup> Brevard's Hispanic and Non-Hispanic population growth table (2022-2025), states "Marion" County.

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- Other specialized experience
  - Ability to enhance the continuum of care
  - Provider with extensive palliative programming
  - Ability to enhance access to transportation
  - Provider with extensive chaplaincy care offerings

The applicant states and the reviewer confirms these points are discussed in detail in pages 44-105 of the application. Major points are also included on pages 7-11 in Catholic Hospice's rationale for the proposed project.

**Florida Hospice, LLC (CON application #10701)** reiterates its response in E.1.a. of this report that a 2018 and two 2019 community health needs assessments in Palm Beach County have identified populations in the area with unmet hospice needs. The applicant contends that this is "Step 1" in meeting SA 9C's unmet hospice needs for the following:

- Uninsured
- Working Poor
- Migrant Community
- Low-Income Elderly
- Black or African Americans
- Hispanic residents
- Residents living in poverty-
  - At or below 100 percent FPL
  - At or below 200 percent FPL
- Homeless
- End-of-Life Issues

Florida Hospice indicates that "Step 2" is to understand why hospice services are not being met. Major headings under Step 2 are (with narratives under each):

- Racial and Ethnic Minorities
- Common Hospice Misconceptions
- Overlooked for Hospice

Florida Hospice's "Step 3" is to identify interventions to help address unmet need. Major headings in Step 3 with narratives for each include:

- Enhancing Health Care Provider Education
- Community Outreach
- The Journey Program (with Journey counselors)

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** reiterates having identified the following Palm Beach County populations that are experiencing unmet hospice needs:

- Seniors age 65+, particularly the most frail and vulnerable – the elderly age 85+ living alone
- The Jewish community
- African Americans
- Hispanic/Haitians/Latinos
- Low income and indigent, including the homeless
- Veterans
- LGBT community
- Residents living in the Glades Area (western portion of Palm Beach County)
- Those suffering from cardiovascular diseases, cancer, respiratory diseases and infectious diseases

MorseLife provides narratives to describe existing programs already in place in SA 9C to meet the hospice needs of these populations on the application's pages 2-11 through 2-19.

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** commits to serve these populations with unmet needs in Palm Beach County:

- Residents with end-stage heart disease
- The growing elderly populations, particularly individuals who are age 75+
- Minority populations, especially Hispanic residents and Spanish speaking individuals (but also French, Portuguese and German speakers)
- Individuals below or near the poverty line
- Homeless individuals

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704)** indicates that patients in the area who have unmet hospice needs include:

- Homeless or near homeless
- Hispanics
- Patients in remote sections of the county
- African-Americans
- End-stage cardiac patients
- Religious groups with specific end-of-life protocols

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The reviewer notes that ProMedica does not provide data in the application to explain how these SA 9C populations were determined to be experiencing unmet hospice need(s).

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)** states being committed to serving the needs of the following underserved groups in addition to all other hospice eligible terminally ill residents in SA 9C:

- Indigent residents
- Veterans and particularly those residing in rural areas of Palm Beach County
- Patients with specific terminally ill diseases and diagnoses

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** maintains that in part from conducting its own community needs assessment and also through other multiple sources, the following populations are experiencing unmet hospice needs in the area:

- Residents of western Palm Beach County, The Glades area of Belle Glade, South Bay and Pahokee
- Pediatric hospice patients and children experiencing grief, particularly those in the western portion of Palm Beach County
- Elderly residents living alone
- Traditionally underserved patients, including:
  - LGBTQ+ residents
  - Hispanic/LatinX and Haitian residents
  - Jewish residents, particularly those experiencing low socio-economics
  - Residents with low literacy
  - Residents experiencing homelessness

**Suncrest Hospice Florida, LLC (CON application #10707)** indicates that, at least in part through an analysis of the Palm Beach County Health Plan, Trella Marketplace Database, Florida Department of Health's healthcharts.com and CMS data, Palm Beach County residents and patients experiencing unmet hospice needs include:

- Racial and ethnic minorities (Black and Hispanic residents)
- Low-income residents, particularly those toward the western portion of the county (the Belle Glade/Pahokee markets)
- Veterans
- Homeless
- LGBTQIA+

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- Hospice patients receiving an inadequate number of hospice team visits, particularly among RNs, social workers and aides:
  - In the last seven days
  - In the last three days
- Cardiovascular Diseases (including heart failure, stroke and hypertension)
- Cancer (including breast, cervical, prostate and colorectal cancer)
- Respiratory Diseases (including chronic lower respiratory and lung diseases)
- Kidney Disease (including nephritis, nephrosis and nephrotic syndrome)
- Chronic Liver Disease
- Diabetes Mellitus
- Alzheimer's Disease

**Transitions Intermediate Holdings, LLC (CON application #10708)** states a commitment to serving the following populations with unmet needs include patient with:

- Cancer
- End Stage Renal Disease
- End Stage Dementia and Alzheimer's Disease
- End Stage Pulmonary Disease
- End Stage Vascular Disease; and
- Veterans

The reviewer notes that in item E.3.a. of this report, the applicant does not include those with cancer and end-stage renal disease as being populations unmet hospice needs.

The following are stated to be a few demographic considerations that the applicant analyzed when assessing a strong match for Transitions' services (pages 62 and 63 of the application). The reviewer offers a comparison between each of the applicant's bulleted considerations and the applicant's exhibits/sources, as shown on pages 63 and 64 of the application:

- Over 25.5 percent of the population in Palm Beach County was over the age of 62 in 2014
  - None of the applicant's three exhibits address area total population/total population by age cohort
- 29.4 percent of Palm Beach County residents report not speaking English at home



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- Exhibit 23-Palm Beach Proportion of Spanish Speaking Population (per the US Census Bureau, American Community Survey, 2014
  - 29.4 percent does not appear in this exhibit and this exhibit does not display any data regarding residents that report not speaking English at home
- 43.9 percent of Palm Beach County residents self-reported not having a strong grasp of the English language
  - Exhibit 23-Palm Beach Proportion of Spanish Speaking Population (per the US Census Bureau, American Community Survey, 2014
    - 43.9 percent appears in this exhibit under the line “Speak a language other than English” and the column “Speak English less than very well”. However, there is no categorization specific to “not having a strong grasp of the English language” per se
- 14.6 percent of Palm Beach County residents live below the Federal Poverty Line
  - Exhibit 24-Palm Beach Poverty Population by Age (no source and no time frame is provided)
    - 14.6 percent does not appear in this exhibit. However, this exhibit indicates that 12.8 percent of the Palm Beach County population is, “below poverty level”
- The rate of hospitalization from congestive heart failure was 75.5, 13 points higher than Florida as a whole
  - There is no exhibit to support this data
- 21.2 percent of all hospital visits are related to poor system management-an area that Transitions pays specific attention to
  - There is no exhibit to support this data

- (2) **Preference shall be given to an applicant who proposes to provide the inpatient care component of the hospice program through contractual arrangements with existing health care facilities, unless the applicant demonstrates a more cost-efficient alternative.**

**Affinity Care of Palm Beach LLC (CON application #10698)** cites its MOUs with the following area SNFs for the provision of general inpatient (GIP) care:

- Colonial Skilled Nursing Facility, LLC
- Encore at Boca Raton Rehabilitation & Nursing Center

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The reviewer notes Colonial Skilled Nursing Facility, LLC was formerly known as Savannah Cove of the Palm Beaches and changed ownership effective September 30, 2021. Details of the MOUs regarding GIP care is described narratively on pages 73 and 74 of the application.

**Brevard HMA Hospice, LLC (CON application #10699)** states that Mederi Hospice will obtain contacts with area facilities to ensure inpatient access to hospice care when necessary. The reviewer notes that the applicant does not have letters of support from area nursing homes and/or hospitals that indicate a willingness to contract with Brevard in SA 9C for the provision of the inpatient care component.

**Catholic Hospice, Inc. (CON application #10700)** states that the applicant proposes to develop contracts with hospitals and nursing homes in Palm Beach County specifically for inpatient hospice care in the area. Catholic Hospice states that the applicant will extend its existing agreement with the following:

- Baptist Health South Florida to include-
  - Bethesda Hospital East
  - Bethesda Hospital West
- Boca Raton Regional Hospital

The applicant references CON application #10700/Exhibit K-Agreement for Inpatient Hospice Beds with Boca Raton Regional Hospital, Bethesda Hospital East and Bethesda Hospital West. The reviewer notes that the applicant's Exhibit K include a one-page October 21, 2021 letter from Rosa A. Breijo, Director of Managed Care, agreeing to extend an April 1, 2000 agreement to include these Palm Beach County facilities.

**Florida Hospice, LLC (CON application #10701)** explains that transferring hospice patients to healthcare facilities for inpatient care should be used only when all other measures to treat the patient at home have been tried. Florida Hospice discusses more cost-effective alternatives by reducing the need for inpatient care including:

- Comfort Kits
- Macy Catheter Protocols

The applicant offers three brief hospice case studies in which Florida Hospital's alternatives were successful in keeping the patient out of an inpatient placement.

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However, Florida Hospice states it will contract with hospitals, SNFs or hospice inpatient units to provide inpatient care for hospice patients as needed within the hospice service area.

As previously indicated in item B of this report, the letter from Signature Healthcare, LLC's Signature Healthcare of Palm Beach (a 120-bed SNF) indicates a desire to offer general inpatient (GIP) hospice services via a joint venture or similar structure with Florida Hospice.

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** provides Vol. 2-Tab 10/Additional Information Exhibit 11. The exhibit is a letter from Keith A. Myers, President and CEO of MorseLife Health System which indicates that the applicant has a floating bed contract with The Joseph L. Morse Health Center, Inc.

Additionally, the letter in this exhibit points out that should the applicant be awarded the CON (CON application #10702), the hospice will also seek contracts with other nursing homes and hospitals throughout Palm Beach County, allowing residents to access inpatient care (general inpatient and respite care) close to their homes.

The reviewer notes that according to the Agency's website at <https://www.floridahealthfinder.gov/facilitylocator/FacilityProfilePage.aspx?id=29012>, the 160 community-bed Joseph L. Morse Health Center, Inc. has the following quality care distinctions:

- JCAHO accredited
- Gold Seal Award recipient
- A 5 of 5 Overall Star Rating in the Agency Nursing Home Guide Rating of (April 2019-September 2021/Last Updated November 2021)
- CMS Medicare Compare Rating (as of 11/12/2021):
  - Much Above Average – overall rating (the highest rating awarded)

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** indicates it will use contractual arrangements with existing providers for inpatient hospice care. The reviewer notes that Odyssey particularly references and includes an excerpt from a letter of support by the CEO at Kindred Hospital/The Palm Beaches. However, the reviewer notes that this letter is of a general supportive nature and does not expressly state a

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willingness to consider entering into a contractual relationship with the applicant in the provision of an inpatient hospice component.

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704)** states that building on its experience in establishing relationships with nursing homes, hospitals and ALFs, ProMedica will quickly create mutual partnerships to better serve hospice patients and cites

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)** maintains that the applicant will contract “scatter beds” in a local skilled nursing facility and/or hospital to provide routine and inpatient hospice care. The applicant does not have letters of support from area nursing homes and/or hospitals that indicate a willingness to contract with Brevard in SA 9C for the provision of the inpatient care component.

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** states that the applicant will contract with existing hospitals and SNFs to provide inpatient care, seeking partnerships throughout the area, including facilities in rural areas. Seasons provides a map (CON application #10706, page 91, “Providers That Have Expressed Interest in a GIP Agreement with Seasons Palm Beach”). The reviewer notes that the map shows a blue star to account for each of eight Palm Beach County geographic locations where a provider has expressed interest. However, the reviewer notes that none of the eight geographic locations indicate a facility name or address.

In its narrative, Seasons names three facilities that have expressed interest (and provides letter of support excerpts to reflect their interest):

- Glades Health Care Center
- Lakeside Medical Center
- North Lake Care Center

Seasons’ letters of support in Exhibit 4 of the application includes six facilities that indicate a willingness to consider entering into a contractual relationship with Seasons for the provision of the inpatient hospice component:

- Encore at Boca Raton Rehabilitation and Nursing Center, The
- Glades Health Care Center
- Jupiter Rehabilitation and Health Care Center

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- Lakeside Medical Center
- North Lake Care Center
- Signature Healthcare of Palm Beach

**Suncrest Hospice Florida, LLC (CON application #10707)**

states that Suncrest Florida will partner with hospitals and SNFs and hopes to contract with existing licensed inpatient hospice facilities to provide general inpatient and respite care to hospice patients.

Suncrest Florida maintains, to date, having secured a SNF contract with the following Palm Beach County provider:

- Oasis Health and Rehabilitation Center

The reviewer notes that the October 20, 2021 letter of support from Pamela Fuses, Administrator, Oasis Health and Rehabilitation Center in CON application #10707, Exhibits G and M does not have language expressly indicating the SNFs willingness to enter into a contractual relationship with Suncrest Florida to provide a hospice inpatient component to Suncrest Florida's program. The statement in the letter is, "I would love to be able to offer the services of Suncrest Hospice to our residents who qualify for these services".

**Transitions Intermediate Holdings, LLC (CON application #10708)** does not respond to this rule preference.

- (3) **Preference shall be given to an applicant who has a commitment to serve patients who do not have primary caregivers at home; the homeless; and patients with AIDS.**

**Affinity Care of Palm Beach LLC (CON application #10698)**

contends that of particular relevance is the historical incidence of AIDS in The Glades, and the Ryan White funds to care for AIDS patients through the local FQHCs. Affinity Care reiterates support from these organizations and its' planned implementation of The Glades action plan and initiative.

**Brevard HMA Hospice, LLC (CON application #10699)** states it has already conditioned regarding those who lack a primary caregiver, as well as the homeless and will serve those with HIV/AIDS.

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**Catholic Hospice, Inc. (CON application #10700)** states it wishes for every patient to be able to remain in the least restrictive, most emotionally supportive environment possible. In addition to the homeless and those with HIV/AIDS, Catholic Hospice discusses bereavement counselors and the Wishes Granted program.

**Florida Hospice, LLC (CON application #10701)** provides separate narratives regarding patients without a primary caregiver, homeless patients and patients with AIDS.

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** affirmatively states a commitment to serve patients who do not have a primary caregiver at home, the homeless and patients with AIDS.

MorseLife states using [www.FLHealthCharts.com](http://www.FLHealthCharts.com) data to provide a Palm Beach County and Florida HIV/AIDS Incidence table on page 2-21, Table 2-1 of the application.

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** states being committed to providing care to all individuals who meet the criteria of terminal illness and reside within the service area, regardless of their living status and diagnosis. Further, this includes patients without primary caregivers at home, the homeless and patients with HIV/AIDS.

Odyssey points out that Humana has announced a \$25 million investment to increase affordable housing in eight states (one being Florida). CON application #10703 emphasizes that this is another example of the synergism and value added relationship between Kindred and Humana.

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704)** states being committed to serve patients who do not have primary caregivers at home, the homeless and patients with AIDS/COVID. Further, a lack of a home or a primary caregiver will not result in a person foregoing the hospice benefit. ProMedica shares its Notice of Nondiscrimination and Accessibility.

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)** states being committed to serving all residents, including the homeless, patients who do not have primary caregivers at home and patients with AIDS.

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** provides a narrative regarding its commitment to patients without caregivers at home, residents experiencing homelessness and patients with HIV/AIDS.

Seasons states that no Palm Beach County hospice provider or competing applicant is Services and Advocacy for Gay Elders (SAGE) certified.

**Suncrest Hospice Florida, LLC (CON application #10707)** responds to this rule preference on pages 69-75 of the application and cites its Schedule C, C.4. Other Conditions/Conditions numbers 5 and 6.

**Transitions Intermediate Holdings, LLC (CON application #10708)** does not respond to this rule preference.

- (4) In the case of proposals for a hospice service area comprised of three or more counties; preference shall be given to an applicant who has a commitment to establish a physical presence in an underserved county or counties.**

The Agency notes that this rule criteria and preference is not applicable, as the total SA 9C geographic area is comprised of a single county – Palm Beach County.

The following applicants confirm this is not applicable without additional comment:

**Catholic Hospice, Inc. (#10700)**  
**Florida Hospice, LLC (#10701)**  
**Odyssey Healthcare of Marion County, LLC(#10703)**  
**ProMedica Hospice of Palm Beach County, FL, LLC (#10704)**  
**PruittHealth Hospice – Southeast Florida, LLC (#10705)**

The following applicants confirm this but also add additional comments as cited below.

**Affinity Care of Palm Beach LLC (CON application #10698)** contests that though this rule preference is not applicable, western Palm Beach County is distinct from the rest of Palm Beach County, lying 30 to 40 miles from the populated, urban portion of SA 9C and that the applicant has a commitment to establish a physical presence in The Glades.

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**Brevard HMA Hospice, LLC (CON application #10699)** reiterates having already conditioned to establish a principal delivery site at the following physical location:

- 4 Harvard Cir #950, West Palm Beach, Florida 33409 (or like site within same region pending finalization of lease terms) upon program inception

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** indicates that this rule preference does not apply but cites its existing location at 4847 David S. Mack Drive in West Palm Beach.

MorseLife comments that in order to provide a hospice presence within the outlying, westerly communities (which the applicant had previously indicated in E.1.a. of this report as being one of the most underserved areas in the county), it is seeking to sub-lease space at Lakeside Medical Center, which is located in Belle Glade, Florida.

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** states that this rule preference does not apply but that Seasons previously documented that the western portion of Palm Beach County is underserved. Seasons states that it is committed to establishing a physical presence in the western portion of the county (see CON application #10706, Schedule C, Condition #6).

**Suncrest Hospice Florida, LLC (CON application #10707)** offers a narrative response and a map offering an arial depiction of the physical location of existing hospices in SA 9C and the location of the proposed Belle Glade project. Also, see CON application #10707's Schedule C, C.1., Specific Site within Service Area 9C.

**Transitions Intermediate Holdings, LLC (CON application #10708)** does not respond to this rule preference.

- (5) Preference shall be given to an applicant who proposes to provide services that are not specifically covered by private insurance, Medicaid, or Medicare.**

**Affinity Care of Palm Beach LLC (CON application #10698)** reiterates portions of its service intensity approach and some of its specialty clinical programs, Continuum Palliative Resources and minority outreach that were briefly addressed in item E.1.a. of this report.



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**Brevard HMA Hospice, LLC (CON application #10699)** bullets 11 Medicare hospice benefits, narratively describes services possibly needed but not paid for by the Medicare hospice benefit and that Mederi Hospice will provide patients without means payment for the services they require. Brevard reiterates its condition to provide \$25,000 for local requests for patient support.

**Catholic Hospice, Inc. (CON application #10700)** states/ reiterates (with narrative added) the provisions of the following: L'Chaim Jewish Hospice, caregiver program, trauma counseling, palliative arts, support for professionals, meal support, music therapy, support groups, Camp Erin (a free bereavement program for children and teens ages 6-17), holocaust survivors, the "Virtual Reality" program and pet therapy.

**Florida Hospice, LLC (CON application #10701)** identifies and provides narrative for 16 services that the parent company provides its hospice patients that will also be provided in SA 9C (pages 51-56 of the application). The reviewer notes that one of the 16 services is the two-day "Healing Heart Children's Camp", designed for children ages 5-17.

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** states (with narrative added for each) the provisions of the following: art therapy (art without barriers), cannabis-based therapies, legacy projects, massage, music (music and memory) and pet therapy, Reiki and "Virtual Reality".

The applicant briefly discusses strong community support for this project through its many letters of support, which was discussed in brief earlier in item B of this report. MorseLife also discusses results of community health needs assessments performed by the Palm Beach County Department of Health and the Health Care District of Palm Beach County (December 2016) and bullets four results from the Glades Regional Health Assessment to indicate unmet needs of minorities, the homeless, the elderly and other populations on page 2-29 of the application.

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** reiterates that many SA 9C residents are at or near poverty may have assets that disqualify them from Medicaid but nevertheless face financial barriers to care. The applicant provides a description of its Alzheimer's/Dementia Program,

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Bereavement Program, Pet Service Support, Volunteers, Services Increasingly Difficult for the Homebound, and Vigil Support.

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704)** points out that it will not discriminate against the ability to pay for services being rendered. The applicant reiterates certain Schedule C conditions.

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)** bullets six programs that it will provide in SA 9C that are not covered by private insurance, Medicaid or Medicare.

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** briefly describes the four core services, and also bullets 18 additional services. Each of these 18 additional services are described (pages 97-109 of the application) and many of these services are conditions to project approval.

**Suncrest Hospice Florida, LLC (CON application #10707)** discusses charity care and the charity assistance through the Suncrest Cares Foundation non-profit programs. See CON application #10707's Schedule 7A anticipated charity care patient day percentages for years one and two, see item E.3.g. of this report.

The reviewer notes that Suncrest offers responses to three other stated preferences:

- Preference given for proposal consistent with “needs of community” and other criteria in local health council plans (i.e. commitment to meet the unmet needs of the community) on pages 80-82 of the application)
- Reducing Barriers to Accessing Care for Underserved and/or Minority Populations (pages 83-84 of the application) and
- Other Populations on pages 84-85 of the application.

**Transitions Intermediate Holdings, LLC (CON application #10708)** does not respond to this rule preference.

b. **Chapter 59C-1.0355, Florida Administrative Code contains the following general provisions and review criteria to be considered in reviewing hospice programs.**

(1) **Required Program Description (Rule 59C-1.0355(6), Florida Administrative Code): An applicant for a new hospice program shall provide a detailed program description in its certificate of need application, including:**

(a) **Proposed staffing, including use of volunteers.**

**Affinity Care of Palm Beach LLC (CON application #10698):** Schedule 6A shows total FTEs at 18.19 in year one (ending April 20, 2023) and 58.82 FTEs in year two (ending April 30, 2024). This is stated to exclude contract staff. The reviewer notes that the year one and year two ending dates are consistent with the applicant's Schedule 10.

**Brevard HMA Hospice, LLC (CON application #10699):** Schedule 6A shows total FTEs at 18.31 in year one (stated to end in "2023") and 28.21 in year two (stated to end in "2024"). Notes to the applicant's Schedule 6A indicate the potential for some contracting and possible contracting with the parent (LHC Group) for DME and some other services.

The reviewer notes that the year one and year two ending dates are not consistent with the applicant's Schedule 10 (which indicate a year one end date of July 2023). The reviewer further notes that use of volunteers is discussed narratively on page 84 of the application.

**Catholic Hospice, Inc. (CON application #10700):** Schedule 6A shows total FTEs at 83.70 in year one (ending date not indicated) and 115.15 in year two (ending date not indicated). The reviewer notes that this represents the FTE staff added by the proposed project.

Notes to Schedule 6A indicates a total of nine functions and services that are shared. Volunteers are discussed on pages 149 and 150 of the application, as well as in other portions of CON application #10700. Pages 150 and 151 of the application discuss/list affiliations with local health professional training programs.

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**Florida Hospice, LLC (CON application #10701):**

Schedule 6A shows total FTEs at 25.15 in year one (ending June 2023) and 41.30 in year two (ending June 2024). Notes to Schedule 6A indicate that many shared support services will be supported from existing corporate staff and that volunteer services will be headed by a full-time local volunteer services coordinator with support from the Residential Foundation and corporate volunteer training, education and support services. The reviewer notes a 1.0 FTE volunteer coordinator for both year one and year two.

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach**

**Hospice by MorseLife (CON application #10702)** provides a Schedule 6A total FTE count of 16.68 in year one (ending 3/31/2023) and a total FTE count of 47.98 in year two (ending 3/31/2024). These total FTE counts are for the FTE staff to be added pursuant to the proposed project. The applicant's existing hospice FTE counts for year one and year two are 26.95 and 43.63, respectively. When the FTEs to be added are included for each year, the applicant's grand total FTE counts, year one and year two, are 43.63 and 91.61, respectively.

Services provided by volunteers are described (pages 2-29 to 2-31 of the application) particularly bulleting 17 volunteer training modules.

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** provides a duplicate staffing chart on the applicant's page 34 and Schedule 6A. The applicant's Schedule 6A total FTE count is 18.0 in year one (CY 2023) and a total FTE count of 33.6 in year two (CY 2024). The applicant indicates that the medical director position is contracted. Volunteers are discussed (pages 34-35 of the application).

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704):**

The applicant's Schedule 6A total FTE is 30.53 in year one (CY 2023) and 37.6 in year two (CY 2024). Notes to the applicant's Schedule 6A indicate that certain administrative functions will be provided to the hospice by corporate and include accounting services, centralized billing, human resources, payroll, etc. The reviewer notes 1.0 FTEs in both year one and year two for a volunteer coordinator.

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705):** Schedule 6A shows total FTEs at 16.97 in year one (ending June 30, 2023) and 33.29 in year two (ending June 30, 2024). Notes to the applicant's Schedule 6A indicate that the local operations will be supported by PruittHealth corporate staff via a management fee and a clinical fee.

The reviewer notes that the year one and year two ending dates are inconsistent with PruittHealth's Schedule 10, which indicates that licensure and initiation of service will commence on January 1, 2023.

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706):** Schedule 6A's total FTEs at 20.7 in year one (CY 2023) and 30.9 in year two (CY 2024). Seasons Schedule 6A notes indicate that contracted positions will include the Medical Director and positions associated with rehabilitative and palliative therapy services. Services provided by volunteers are described in detail (pages 115-119 of the application).

**Suncrest Hospice Florida, LLC (CON application #10707)** provides a Schedule 6A total FTE count of 15.6 in year one (no ending date provided) and 50.4 in year two (no ending date provided). There are no accompanying notes to the applicant's Schedule 6A.

Volunteer services are described on pages 96-98, 104-105 and 124 of the application. The reviewer notes Suncrest's Schedule 6A has Volunteer Coordinator at 0.5 FTEs in year one and 1.75 in year two and Volunteer/bereavement at 0.5 FTEs in year one and 2.75 in year two.

The reviewer notes that on page 50 of the application, as well as in CON application #10707, Schedule C, C.3. Special Programs/Conditions #6 and #2, Suncrest Florida states that a Satisfaction Improvement Manager will be appointed. However, there are no FTEs for a Satisfaction Improvement Manager for year one or for year two in the applicant's Schedule 6A.

Page 90 of the application indicates that wherever contracted services are utilized, Suncrest Florida shall retain responsibilities for planning, coordinating, and prescribing hospice care services for patients.

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**Transitions Intermediate Holdings, LLC (CON application #10708)** provides a Schedule 6 total FTE count of 27.7 in year one (ending 2022) and 43.8 in year two (ending 2023). The reviewer determined the applicant's year one total FTE count (27.7) by adding the morning, evening and night FTEs, since the applicant left the FTE total column blank for year one.

The reviewer notes that:

- The applicant's year one ending date (2022) and year two ending date (2023) are both inconsistent with CON application #10708 Schedule 10, which indicates that both initiation of license and initiation of service are to occur in October 2022
- Notes to Schedule 6 (bullet 5 of 8) indicates plans to initially hire three Regional Hospice Coordinators (community liaisons). However, Schedule 6 lists no Regional Hospice Coordinator FTEs and no community liaison FTEs. Also in year one, no 3.0 FTEs are indicated for any position and in year two, the only 3.0 FTEs is for Admissions Director(s).

**(b) Expected sources of patient referrals.**

**Affinity Care of Palm Beach LLC (CON application #10698)** reiterates its letters of support and indicates that attracting patients will not be difficult. In response to this item, Affinity Care lists, by category and by name, the entities/individuals previously stated in Tab 5 of the application. The reviewer notes that a category mentioned here but not named (as a specific category) in Tab 5 of the application is "Community Leaders and Elected Officials".

**Brevard HMA Hospice, LLC (CON application #10699)** bullets 12 expected sources of potential patient referrals.

**Catholic Hospice, Inc. (CON application #10700)** bullets 11 expected sources of potential patient referrals.

**Florida Hospice, LLC (CON application #10701)** bullets 15 expected sources of potential patient referrals.

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** asserts that no other competing applicant comes close to the

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breadth and depth of referral sources as that of MorseLife, with a nearly 40-year history of serving Palm Beach County. The applicant provides a narrative description of its existing referral sources and again reiterates its letters of support.

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** bullets a total of 99 percent of expected sources of patient referrals are to be drawn from a total of eight sources with the remaining one percent to be drawn from (but not limited to): independent living, rehabilitation facilities, dialysis centers, caregivers, etc.

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704)** bullets nine sources that ProMedica states it will target for hospice referrals. The applicant also references some Schedule C conditions.

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)** states that referrals will not be difficult, originating from area physicians, hospitals, SNFs, other health care providers, family members and the patients themselves.

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** bullets 13 expected sources of potential patient referrals.

**Suncrest Hospice Florida, LLC (CON application #10707)** states that it will reach out to hospitals, SNFs, ALFs, home care agencies, community health centers, medical officers/other medical providers. Suncrest Florida also states it expects to receive referrals from social service organizations, religious organizations, shelters, community centers and other organizations.

**Transitions Intermediate Holdings, LLC (CON application #10708)** does not respond to this rule preference.

- (c) **Projected number of admissions, by payer type, including Medicare, Medicaid, private insurance, self-pay, and indigent care patients for the first two years of operation.**

**Affinity Care of Palm Beach LLC (CON application #10698)** provides the following table by payer source:

**CON Action Numbers: 10698 through 10708**

**Affinity Care of Palm Beach, LLC  
Admissions by Payer Source**

<b>Payer Source</b>	<b>Year One Admissions</b>	<b>Year Two Admissions</b>
Medicare	169	416
Medicaid	8	18
Charity	7	16
Self-Pay	1	2
Insurance	4	9
<b>Total</b>	<b>188*</b>	<b>462*</b>

Source: CON application #10698, page 177.

Note: \* The applicant's year one and two totals 189 and 461, respectively.

**Brevard HMA Hospice, LLC (CON application #10699)** provides the following table to account for projected admissions by payer source:

**Brevard HMA Hospice, LLC  
Admissions by Payer Source**

<b>Payer Source</b>	<b>Year One Admissions</b>	<b>Year Two Admissions</b>
Medicare	224	339
Medicaid	7	11
Commercial	10	15
Self-Pay	0	0
Indigent	2	3
<b>Total</b>	<b>243</b>	<b>368</b>

Source: CON application #10699, page 85

**Catholic Hospice, Inc. (CON application #10700)** provides the following table to account for projected admissions by payer source:

**Catholic Hospice, Inc.  
Admissions by Payer Source**

<b>Payer Source</b>	<b>Year One Admissions</b>	<b>Year Two Admissions</b>
Medicare	844	975
Medicaid	37	43
Commercial	28	32
Self-Pay	19	21
<b>Total</b>	<b>928</b>	<b>1,071</b>

Source: CON application #10700, page 151, Figure 43

**Florida Hospice, LLC (CON application #10701)** provides the following table to account for projected admissions by payer source (the reviewer reproduces the totals only and not the corresponding percentages):



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**Florida Hospice, LLC  
Admissions by Payer Source**

<b>Payer Type</b>	<b>Year One Admissions</b>	<b>Year Two Admissions</b>
Medicare	231	423
Medicaid	7	13
Commercial Insurance	13	24
Self-Pay/Charity	1	1
<b>Total</b>	<b>252</b>	<b>462*</b>

Source: CON application #10701, page 58  
Note: \* This total is 461.

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** provides a table to account for total admissions as well as additional admissions, with additional admissions pursuant to the proposed project. While year one and year two total admissions are estimated at 366 and 610, respectively, the reviewer reproduces only the estimated admissions added pursuant to the project’s approval. See the table below for the projected additional admissions by payer source.

**MorseLife Hospice Institute, Inc.  
d/b/a Palm Beach Hospice by MorseLife  
Additional Admissions by Payer Source**

<b>Payer Type</b>	<b>Year One Admissions</b>	<b>Year Two Admissions</b>
Medicare	162	377
Medicaid	10	24
Insurance	7	18
Self-Pay	3	8
Other	0.4	0.8
<b>Total</b>	<b>183*</b>	<b>427*</b>

Source: CON application #10702, page 2-32, Table 2-2 (partially reproduced)  
Note: \* The applicant rounds it totals - one up two down.

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** provides the following table to account for projected admissions by payer source.

**Odyssey Healthcare of Marion County, LLC  
Admissions by Payer Type**

<b>Payer Type</b>	<b>Year One Admissions</b>	<b>Year Two Admissions</b>
Medicare	222	421
Medicaid	10	18
Commercial	3	7
Unfunded/Charity	9	17
<b>Total</b>	<b>244</b>	<b>462*</b>

Source: CON application #10703, page 36, Table 18  
Note: \* This total is 463.

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**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704)** refers the Agency to ProMedica’s Schedule 7A and indicates total expected admissions in year one to be 313 and 450 in year two.

The reviewer notes that the applicant’s Schedule 7A identifies payer sources according to patient days and not according to a count of admissions. The reviewer notes that CON application #10704 does not expressly state the number of admissions by payer type for year one or for year two.

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)** projected admissions by payer source are shown in the table below.

**PruittHealth Hospice-Southeast Florida, LC  
Admissions by Payer Source**

<b>Payor</b>	<b>Year One</b>	<b>Year Two</b>
Medicare	128	299
Medicaid	4	10
Commercial	4	8
Self-Pay/Indigent	4	10
<b>Total</b>	<b>140</b>	<b>327</b>

Source: CON application #10705, page 100, Figure 70 (partially reproduced)

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** provides the following table to account for projected admissions and patient days by payer source (the reviewer does not reproduce the percent of days column):

**Seasons Hospice & Palliative Care of Palm Beach County, LLC  
Admissions by Payer Source**

<b>Payer</b>	<b>Admissions</b>		<b>Patient Days</b>	
	<b>Year One</b>	<b>Year Two</b>	<b>Year One</b>	<b>Year Two</b>
Medicare	175	381	11,365	24,796
Medicaid	4	9	243	530
Insurance	3	8	243	530
Self-Pay/Charity	5	10	304	663
<b>Total</b>	<b>187</b>	<b>408</b>	<b>12,155</b>	<b>26,520</b>

Source: CON application #10706, page 121

Seasons points out that medically indigent days are included as part of the self-pay days and account for two percent of the total amount. See the applicant’s response to item E.3.g. of this report.

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**Suncrest Hospice Florida, LLC (CON application #10707)** provides the following table to account for projected admissions by payer source:

**Suncrest Hospice Florida, LLC  
Admissions by Payer Source**

<b>Payer Source</b>	<b>Year One Admissions</b>	<b>Year Two Admissions</b>
Medicare	130	511
Medicaid	3	13
Insurance	4	20
Self-Pay	5	14
Charity/Indigent	14	12
<b>Total</b>	<b>156</b>	<b>570</b>

Source: CON application #10707, page 108, Table 15

**Transitions Intermediate Holdings, LLC (CON application #10708)** does not respond to this rule preference.

- (d) **Projected number of admissions, by type of terminal illness, for the first two years of operation.**

**Affinity Care of Palm Beach LLC (CON application #10698)** provides the following table to account for projected admissions by type of terminal illness and by age cohort (under 65 and over 65). The reviewer combines these admission categories (terminal illness and age cohorts) for convenience and to reflect consistency with page 151 of the application.

**Affinity Care of Palm Beach, LLC  
Admissions by Terminal Illness and Under/Over Age 65**

<b>Disease</b>	<b>Year One Admissions</b>	<b>Year Two Admissions</b>
Cancer	42	110
Cardiac	52	128
Respiratory	35	86
Renal Failure	25	61
Alzheimer's/Dementia	9	23
HIV/AIDS	4	6
Other	21	48
<b>Total</b>	<b>188</b>	<b>462</b>
Under Age 65	19	23
Over Age 65	169	439
<b>All Ages Cohort Total</b>	<b>188</b>	<b>462</b>

Source: CON application #10698, page 151 and 178

**Brevard HMA Hospice, LLC (CON application #10699)** provides the following table to account for projected admissions by type of terminal illness (cancer or non-cancer) and applicable age cohort and then by age cohort

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(under 65 and 65+). The reviewer combines these admission categories (terminal illness and age cohorts) for convenience. See the table below.

**Brevard HMA Hospice, LLC  
Admissions by Terminal Illness by Age Cohort and  
Under Age 65 and Age 65+**

<b>Disease</b>	<b>Year One Admissions</b>	<b>Year Two Admissions</b>
Cancer Under 65	11	16
Cancer 65+	42	63
Non-Cancer Under 65	37	56
Non-Cancer 65+	153	233
<b>Total</b>	<b>243</b>	<b>368</b>
Under Age 65	48	72
Age 65+	195	296
<b>All Ages Cohort Total</b>	<b>243</b>	<b>368</b>

Source: CON application #10698, page 85

**Catholic Hospice, Inc. (CON application #10700)** provides the following table to account for projected admissions by type of terminal illness (cancer or non-cancer) and applicable age cohort and then by age cohort (under 65 and 65+). The reviewer combines these admission categories (terminal illness and age cohorts) for convenience:

**Catholic Hospice, Inc.  
Admissions by Terminal Illness by Age Cohort and  
Under Age 65 and Age 65+**

<b>Disease</b>	<b>Year One Admissions</b>	<b>Year Two Admissions</b>
Cancer Under 65	41	47
Cancer 65+	160	184
Non-Cancer Under 65	140	162
Non-Cancer 65+	587	678
<b>Total</b>	<b>928</b>	<b>1,071</b>
Under Age 65	181	209
Age 65+	747	862
<b>All Ages Cohort Total</b>	<b>928</b>	<b>1,071</b>

Source: CON application #10700, page 152, Figures 44 and 45 (combined)

**Florida Hospice, LLC (CON application #10701)** provides the following table to account for projected admissions by type of terminal illness (cancer or “other”) and applicable age cohorts (under 65 and age 65+). The reviewer that this table accounts for the applicant’s response in item E.2.b.(1)(e) below. The reviewer does not reproduce the applicant’s annual percentages.

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**Catholic Hospice, Inc.  
Admissions by Terminal Illness (Cancer or "Other") and by Age Cohort  
(Under 65 and Age 65+)**

Terminal Illness	Year One Admissions			Year Two Admissions		
	Under 65	65+	Total	Under 65	65+	Total
Cancer	12	53	65	22	98	120
Other	13	174	187	23	319	342
<b>Total</b>	<b>25</b>	<b>227</b>	<b>252</b>	<b>45</b>	<b>417</b>	<b>462</b>

Source: CON application #10701, page 58

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** provides a table to account for total admissions as well as additional admissions, with additional admissions pursuant to the proposed project. The reviewer notes that while year one and year two total admissions are estimated at 366 and 610, respectively, the reviewer reproduces only the estimated admissions added, pursuant to the proposed project. See the table below for the projected additional admissions by type of terminal illness (the reviewer reproduces the totals only):

**MorseLife Hospice Institute, Inc.  
d/b/a Palm Beach Hospice by MorseLife  
Additional Admissions by Diagnosis/Disease Category**

Primary Diagnosis	Year One Admissions	Year Two Admissions
Cancer	81	143
End-Stage Heart	24	66
End-Stage Pulmonary Disease	16	45
End-Stage Renal Disease (ESRD)	3	9
AIDS	0	1
Other Diagnosis	59	163
<b>Total</b>	<b>184*</b>	<b>427</b>

Source: CON application #10702, page 2-33, Table 2-3 (partially reproduced)

Note: \* This total is 183.

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** provides the following table to account for projected admissions by type of terminal illness for year one and for year two, as well as the corresponding percentage of admission for each principal diagnosis.

**Odyssey Healthcare of Marion County, LLC  
Admissions by Type of Terminal Illness/Principal Diagnosis**

	Total Admits	Cancer	HIV/AIDS	End-Stage Pulmonary Disease	End-Stage Renal Disease	End-Stage Heart Disease	Other
Year One	244	69	1	23	4	59	88
Year Two	462	131	1	44	8	111	167

Source: CON application #10703, page 36, Table 20

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**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704)** reiterates expected admissions of 313 in year one and 450 in year two. The applicant reproduces the five current and production tables briefly described in item E.1.a. of this report. The reviewer notes that CON application #10704 does not expressly indicate its expected number of admissions by type of terminal illness for either year one or for year two.

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)** provides the following table to account for projected admissions by type of terminal illness and then by age cohort (under 65 and over 65).

**PruittHealth Hospice-Southeast Florida, LLC  
Admissions by Terminal Illness and by  
Age Cohort (Under Age 65 and Over Age**

<b>Terminal Illness</b>	<b>Year One</b>	<b>Year Two</b>
Cancer	55	129
Cardiac	46	106
Respiratory	17	39
Cardiovascular/Stroke	10	24
Alzheimer's/Cerebral Degeneration	5	12
Diabetes	4	10
Renal Failure	3	8
<b>Total</b>	<b>140</b>	<b>327*</b>
Under Age 65	42	98
Over Age 65	98	229
<b>All Ages Cohort Total</b>	<b>140</b>	<b>327</b>

Source: CON application #10705, page 100, Figure 71 and page 101, Figure 72 combined  
Note: \* This totals 328 probably due to rounding diseases by percentages.

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** states that estimates by disease category are based on the distribution of patients served by Seasons' Florida hospice programs historically but stresses that Seasons serves all persons, regardless of disease type with a hospice-eligible terminal prognosis.

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**Seasons Hospice & Palliative Care of Palm Beach County, LLC  
Admissions by Terminal Illness**

<b>Diagnosis</b>	<b>Year One Admissions</b>	<b>Year Two Admissions</b>
Circulatory System	56	120
Neoplasms (Cancer)	52	114
Nervous System (incl. Alzheimer's)	30	66
Respiratory System	16	35
Digestive System	6	13
Endo./Nutrition/Metabolism	5	11
Infectious and Parasitic	5	11
Acute Respiratory Infections	7	15
Injury & Poisoning, External Causes	6	13
Genitourinary System	2	5
Symptoms & Findings, Not Classified	1	3
Other	1	2
<b>Total</b>	<b>187</b>	<b>408</b>

Source: CON application #10706, page 121

**Suncrest Hospice Florida, LLC (CON application #10707)** provides the following table to account for projected admissions by type of terminal illness and then by age cohort (under 65 and over 65).

**Suncrest Hospice Florida, LLC  
Admissions by Terminal Illness and by  
Age Cohort (Under Age 65 and Over Age**

<b>Terminal Illness</b>	<b>Year One Admissions</b>	<b>Year Two Admissions</b>
Cancer	49	171
Heart	28	100
Dementia	24	89
Respiratory	18	63
Stroke	14	55
Kidney	3	12
Other	20	80
<b>Total</b>	<b>156</b>	<b>570</b>
Under 65	146	527
Over 65	10	43
<b>All Ages Cohort Total</b>	<b>156</b>	<b>570</b>

Source: CON application #10707, page 109, Tables 16 and 17 combined.

**Transitions Intermediate Holdings, LLC (CON application #10708)** does not respond to this rule preference.

- (e) **Projected number of admissions, by two age groups, under 65 and 65 or older, for the first two years of operation.**

The following applicants' (by name and CON application number) responses to this criterion are found in their response to item E.2.b.(1)(d) above.

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- **Affinity Care of Palm Beach LLC (10698)**
- **Brevard HMA Hospice, LLC (10699)**
- **Catholic Hospice, Inc. (10700)**
- **Florida Hospice, LLC (10701)**
- **PruittHealth Hospice–Southeast Florida (10705)**
- **Suncrest Hospice Florida, LLC (10707)**

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** provides a table to account for total admissions as well as additional admissions, with additional admissions pursuant to the proposed project. The reviewer notes that while year one and year two total admissions are estimated at 366 and 610, respectively, the reviewer reproduces only the estimated admissions added, pursuant to the proposed project. See the table below for the projected additional admissions by the age cohort of under 65 and 65+.

**MorseLife Hospice Institute, Inc.  
Additional Admissions by Age Under 65 and Age 65+**

<b>MorseLife Additional Admissions</b>	<b>Cancer Under 65</b>	<b>Cancer 65+</b>	<b>Other Under 65</b>	<b>Other 65+</b>	<b>Additional Total Admissions</b>
Year One	18	63	18	85	<b>184</b>
Year Two	29	114	31	253	<b>427</b>

Source: CON application #10702, page 2-33, Table 2-4 (partially reproduced)

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** provides the following table to account for admissions by age group (0-64 and 65+) for year one and for year two. The applicant’s percentage of admissions by the referenced age groups is not included below.

**Odyssey Healthcare of Marion County, LLC  
Admissions by Age Group**

	<b>Total Admits</b>	<b>0-64</b>	<b>65+</b>
Year One	244	27	217
Year Two	462	51	411

Source: CON application #10703, page 37, Table 21

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704)** again reiterates expected admission of 313 in year one and 450 in year two. The applicant directs the Agency to CON application #10704’s five current and projection tables described earlier (in items E.1.a. and E.2.b.(1)(d) of this report). The reviewer notes that CON



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application #10704 does not expressly indicate its expected number of admissions by age group (under 65 and age 65+) for year one or for year two.

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** states that the number of admissions in each age group is based on Seasons' historical experience in Florida, adjusted for the programs described in the application.

**Seasons Hospice & Palliative Care of Palm Beach County, LLC  
Admissions by Age Group (under 65 and Age 65+)**

Year	Admissions		
	0-64	65+	Total
Year One	27	160	187
Year Two	58	350	408

Source: CON application #10706, page 122

**Transitions Intermediate Holdings, LLC (CON application #10708)** does not respond to this rule preference.

**(f) Identification of the services that will be provided directly by hospice staff and volunteers and those that will be provided through contractual arrangements.**

*Pertinent to this rule preference, the Agency notes the following:*

- **Section 400.609 (1) (a) & (b) Florida Statutes**, states (a):
  - *The hospice care team shall directly provide the following core services: nursing services, social work services, pastoral or counseling services, dietary counseling, and bereavement counseling services. Physician services may be provided by the hospice directly or through contract. A hospice may also use contracted staff if necessary to supplement hospice employees in order to meet the needs of patients during periods of peak patient loads or under extraordinary circumstances*

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(b):

- *Each hospice must also provide or arrange for such additional services as are needed to meet the palliative and support needs of the patient and family. These services may include, but are not limited to, physical therapy, occupational therapy, speech therapy, massage therapy, home health aide services, infusion therapy, provision of medical supplies and durable medical equipment, day care, homemaker and chore services, and funeral services*

**Affinity Care of Palm Beach LLC (CON application #10698)** briefly responds to this rule preference (pages 178 and 179 of the application).

**Brevard HMA Hospice, LLC (CON application #10699)** responds to this rule preference (pages 85-87 of the application). Brevard bullets 14 services to be provided directly by Mederi Hospice staff with the medical director being contacted. Additionally, Brevard bullets 24 administrative functions that may be procured in whole or in part from LHC Group.

The applicant maintains that at all times, Mederi Hospice will directly provide those services and functions mandated by State and Federal regulations.

**Catholic Hospice, Inc. (CON application #10700)** responds to this rule preference (pages 152-153 of the application). Catholic Hospice bullets:

- 25 core services that the applicant indicates are required to be delivered by Catholic Hospice's hospice staff directly
- 22 functions/services that the applicant states are in-house/administrative that are offered through the applicant's parent – Catholic Health

**Florida Hospice, LLC/CON application #10701** responds to this rule preference (page 59 of the application). Florida Hospice bullets:

- 13 services that will be provided directly from members of the hospice care team
- Nine services that will be provided through contractual arrangements

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**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** provides a narrative response to this rule preference on pages 2-33 through 2-38 of the application. The applicant's Table 2-5 lists six functions of MorseLife Hospice services and individuals providing support. Volunteers are stated to be used for emotional support, family and patient care support and spiritual support.

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** states it will meet all state and Medicare guidelines to become a Medicare-certified hospice (including seven stated core services). The reviewer notes that in CON application #10703, page 38, Table 22, Odyssey breaks down a list of 14 direct services (employees and volunteers) as well as six contract services.

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704)** explains that with the exception of physicians, hospice core services will be provided by the hospice care team, including volunteers. ProMedica further explains that when needed, contract services are determined on an individualized basis.

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)** discusses core services, volunteers and contracting for certain services as needed by the patients.

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** bullets 11 elements to be included in any legally binding contracts, along with four additional provisions that the applicant indicates also apply.

**Suncrest Hospice Florida, LLC (CON application #10707)** applicant cites the services that will be provided by contract as well as those to be provided by employees.

**Transitions Intermediate Holdings, LLC (CON application #10708)** does not respond to this rule preference.

The reviewer notes that volunteers and volunteer services are discussed in other portions of the application.

**(g) Proposed arrangements for providing inpatient care.**

**Affinity Care of Palm Beach LLC (CON application #10698)** reiterates arrangements for providing inpatient care originally indicated in items B, E.1. and E.2.a.(2) of this report.

**Brevard HMA Hospice, LLC (CON application #10699)** reiterates arrangements for providing inpatient care through contacts with existing inpatient hospice care resources within SA 9C.

**Catholic Hospice, Inc. (CON application #10700)** reiterates plans to develop relationships with local healthcare providers throughout the service area, including nursing homes and hospitals, for hospice patients. The applicant also reiterates its Exhibits K, L and F. These were previously discussed in brief in item E.2.a.(2) of this report.

**Florida Hospice, LLC (CON application #10701)** reiterates arrangements for providing inpatient care originally indicated in items B and E.2.a.(2) of this report.

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** reiterates its current arrangement for providing inpatient care originally indicated in item E.2.a.(2) of this report.

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** states that it will provide inpatient care by contracting with hospitals and nursing homes to utilize their beds to provide the needed inpatient services. This topic was also addressed in item E.2.a.(2) of this report.

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704)** states that initially, the provision of inpatient care will be through contractual arrangements with hospitals and nursing homes. This topic was also addressed in item E.2.a.(2) of this report.

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)** reiterates arrangements for “scatter beds” with local service area hospitals and SNFs with an intent that residents will be able to have their inpatient and respite hospice care needs met closer to home.

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** states an assurance that the provision of an inpatient level of care will be through contracts with nursing homes and hospitals which are enrolled as providers of Medicare or Medicaid services. The provision of inpatient services was briefly discussed in item E.2.a.(2) of this report.

**Suncrest Hospice Florida, LLC (CON application #10707)** explains that the applicant will establish inpatient agreements with hospitals, SNFs and licensed inpatient hospice facilities.

**Transitions Intermediate Holdings, LLC (CON application #10708)** does not respond to this rule preference.

**(h) Proposed number of inpatient beds that will be located in a freestanding inpatient facility, in hospitals, and in nursing homes.**

While none of the applicants provide a projection of the number of beds they plan to contract for, a brief discussion of their responses is provided below.

**Affinity Care of Palm Beach LLC (CON application #10698)** reiterates by name a total of 20 Palm Beach County SNFs that support the proposed project and two area SNFs in particular (Colonial and Encore) with which Affinity Care already has signed and dated MOUs to address the inpatient component regarding this rule preference.

**Brevard HMA Hospice, LLC (CON application #10699)** states that it is not requesting any new inpatient beds at this time.

**Catholic Hospice, Inc. (CON application #10700)** states that this rule preference is not applicable and that it will contract with existing health care facilities for inpatient beds when needed.

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**Florida Hospice, LLC (CON application #10701)** states that this is not applicable, reiterating that Florida Hospice will contract with existing hospitals, SNFs or hospice inpatient units to provide inpatient beds as needed.

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** states that the applicant does not plan to construct or to operate a freestanding inpatient hospice facility during the first two years of the (proposed) hospice expansion. MorseLife again reiterates having a contract with Joseph L. Morse Health Center for hospice inpatient care when needed.

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** states that it does not propose to construct a freestanding hospice facility. Odyssey expects inpatient days to total 69 patient days in year one and to total 154 patient days in year two.

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704)** maintains that this is not applicable, as the applicant proposes to contract for inpatient beds with existing providers.

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)** maintains that it will use existing licensed beds (as reiterated through contractual arrangements with local SNFs/hospitals) and that as such, zero (0) inpatient beds will be located in a freestanding inpatient hospice facility, a hospital or a SNF.

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** states that in the first two years of operation, it has no plans to construct or to operate a freestanding inpatient hospice facility. Seasons explains that initially, it will contract for “scatter beds” within nursing homes and hospitals throughout the service area and that there are no contracts for establishing inpatient units for a specified number of beds.

**Suncrest Hospice Florida, LLC (CON application #10707)** reiterates part of what was previously discussed in brief in item E.2.a.(2). However, not previously stated is that Suncrest Florida has requested GIP agreements with the three hospice inpatient centers in SA 9C but that each

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declined to formally engage the applicant in a letter of intent to pursue a contract pending licensure of Suncrest Florida. However, the applicant again states being hopeful that such contracting may be available for Suncrest Florida patients once the applicant is licensed.

The reviewer notes that unlike in the applicant's response in item E.2.a.(2) of this report, Suncrest Florida does not restate here having secured a contract with the SNF - Oasis Health and Rehabilitation Center.

**Transitions Intermediate Holdings, LLC (CON application #10708)** does not respond to this rule preference.

**(i) Circumstances under which a patient would be admitted to an inpatient bed.**

**Affinity Care of Palm Beach LLC (CON application #10698)** provides a brief narrative (pages 180 and 181 of the application) detailing its understanding of the criteria that needs to be met to admit a patient for inpatient care.

**Brevard HMA Hospice, LLC (CON application #10699)** provides a brief narrative (pages 87 and 88 of the application) detailing circumstances under which a patient would be admitted to an inpatient bed.

**Catholic Hospice, Inc. (CON application #10700)** provides a brief narrative (page 156 of the application) detailing circumstances under which a patient would be admitted to an inpatient bed.

**Florida Hospice, LLC (CON application #10701)** provides a brief narrative (page 60 of the application) detailing its understanding of the criteria that needs to be met in order to admit a patient for inpatient care. The applicant bullets 11 circumstances under which a patient would be admitted to an inpatient bed.

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** provides a narrative on the application's pages 2-39 and 2-40 detailing its understanding of the criteria that needs to be met to admit a patient for inpatient care. MorseLife bullets

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six training topics it states are provided to inpatient staff who are most likely to provide care to hospice patients.

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** provides a brief narrative (pages 39-40 of the application) detailing circumstances under which a patient would be admitted to an inpatient bed. Major reasons identified by the applicant include A) Pain control that is unable to be managed in the home setting, B) Other symptoms, C) Psychosocial pathology and D) Clinical indications for continued stay at the inpatient level of care.

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704)** provides a very brief narrative (page 30 of the application) in which it explains that inpatient care is dictated by the patient's medical needs. Further, ProMedica patients are encouraged to seek the level of care with which they are most comfortable, including inpatient hospice care.

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)** provides a brief narrative (page 102 of the application) detailing circumstances under which a patient would be admitted to an inpatient bed.

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** provides a narrative (pages 124-126 of the application) detailing circumstances under which a patient would be admitted to an inpatient bed. Seasons offers a narrative description of an eight-step process.

**Suncrest Hospice Florida, LLC (CON application #10707)** provides a narrative (pages 110-112 of the application) detailing circumstances under which a patient would be admitted to an inpatient bed. Suncrest Florida bullets 10 situations that cannot be feasibly managed in the home setting and would generate a GIP placement.

**Transitions Intermediate Holdings, LLC (CON application #10708)** does not respond to this rule preference.



(j) **Provisions for serving persons without primary caregivers at home.**

**Affinity Care of Palm Beach LLC (CON application #10698)** provides a narrative detailing its understanding of the criteria that needs to be met to serve patients without a primary caregiver.

**Brevard HMA Hospice, LLC (CON application #10699)** provides a brief narrative detailing its provisions for serving persons without a primary caregiver at home.

**Catholic Hospice, Inc. (CON application #10700)** provides a brief narrative detailing its for serving persons without a primary caregiver at home.

**Florida Hospice, LLC (CON application #10701)** provides a brief narrative detailing its understanding of the criteria that needs to be met to serve patients without a primary caregiver.

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** provides a brief narrative detailing its provisions for serving persons without a primary caregiver at home.

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** provides a brief narrative detailing its understanding of the criteria that needs to be met to serve patients without a primary caregiver. Odyssey provides a list of six procedures to address when patients do not have a primary family/caregiver.

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704)** provides a brief narrative stating that it serves patients without caregivers and works with patients in developing a Plan of Care to get the patient the care they need, when they can no longer care for themselves. CON application #10704's Attachments 8 and 12 are referenced.

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)** provides a brief narrative detailing its provisions for serving persons without a primary caregiver at home.

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** provides a narrative detailing its provisions for serving persons without a primary caregiver at home.

**Suncrest Hospice Florida, LLC (CON application #10707)** provides a narrative its provisions for serving persons without a primary caregiver at home and cites its proposed Schedule C, C.4. Other Conditions/Condition #5.

**Transitions Intermediate Holdings, LLC (CON application #10708)** does not respond to this rule preference.

**(k) Arrangements for the provision of bereavement services.**

*Pertinent to this rule preference, the Agency notes the following:*

- *Section 400.609 (1) (a) Florida Statutes indicates the hospice care team shall directly provide bereavement counseling services*
- *Section 400.609(5) Florida Statutes states this must be a comprehensive program, under professional supervision, that provides a continuum of formal and informal support services to the family for a minimum of 1 year after the patient's death*

**Affinity Care of Palm Beach LLC (CON application #10698)** provides a brief narrative (pages 181 and 182 of the application) detailing its understanding of the criteria that needs to be met to make or have arrangements for the provision of bereavement services. According to the applicant, Affinity Care will focus its efforts on outreach and education within specific minority communities. The reviewer notes that the applicant again comments on specific interest in The Glades area, veterans, Black and Hispanic residents of Palm Beach County.

**Brevard HMA Hospice, LLC (CON application #10699)** provides a brief narrative (pages 88 and 89 of the application) detailing its understanding of the criteria that needs to be met to make or have arrangements for the provision of bereavement services. Brevard states bereavement counseling will be extended to various

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locations/sites and will be coordinated, when appropriate, with the individual's community spiritual advisor, if any, as well as with other community resources judged to be useful to the family and caregiver(s).

**Catholic Hospice, Inc. (CON application #10700)** provides a narrative (pages 157-159 of the application) detailing its understanding of the criteria that needs to be met to make or have arrangements for the provision of bereavement services. Catholic Hospice reiterates its Camp Erin (very briefly mentioned in item E.2.a.(5) of this report). Catholic Hospice points out:

- Six examples grief and mourning support groups
- Five examples of partnering with multiple community agencies and corporations to deliver direct support to assist people managing difficult situations

Catholic Hospice offers other description of trauma counseling and other bereavement counseling services for the community, stated to be free of cost.

**Florida Hospice, LLC (CON application #10701)** provides a brief narrative (pages 61 and 62 of the application) detailing its understanding of the criteria that needs to be met in order to make or have arrangements for the provision of bereavement services. Florida Hospice cites nine bereavement service provisions and ten separate services it will offer.

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** provides a brief narrative (pages 2-41 and 2-42 of the application) detailing its understanding of the criteria that needs to be met to make or have arrangements for the provision of bereavement services. The applicant states that since its inception in 2019, the MorseLife Hospice Bereavement program has provided services to approximately 300 families, both Christian and Jewish.

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** provides a narrative (pages 40-43 of the application) detailing its understanding of the criteria that needs to be met in order to make or have arrangements for the provision of bereavement services. Odyssey provides a discussion of hospice bereavement services, the purpose

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of such services, the goals of bereavement interventions, initial loss issues, as well as involving the patient and family. This includes a Bereavement Plan of Care, which addresses discharge from bereavement or continued support.

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704)** provides a very brief (two sentence) narrative (page 30 of the application). ProMedica explains having a strong commitment to providing bereavement services both to surviving family members and to the community at large. ProMedica also states that it will employ a full-time bereavement coordinator in order to establish the types of bereavement programs that are provided throughout its national network of hospices and references CON application #10704's Attachment 12.

The reviewer confirms that CON application #10704, Schedule 6A includes one FTE (for both year one and year two) for "Other: Bereavement".

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)** provides a brief narrative (page 103 of the application) detailing its understanding of the criteria for the provision of bereavement services. According to PruittHealth, bereavement counseling will be provided by the chaplain or medical social worker with an emphasis on patient and family support with maximum utilization of community resources. PruittHealth's Camp Cocoon (bereavement targeted for children) is discussed and was previously conditioned in CON application #10705, Schedule C.

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** provides a narrative (pages 127-128 of the application) detailing its understanding of the criteria for the provision of bereavement services and cites CON application #10706's Exhibit 41-Bereavement Materials.

**Suncrest Hospice Florida, LLC (CON application #10707)** provides a narrative (pages 114-115 of the application) detailing its understanding of the criteria for the provision of bereavement services.

**Transitions Intermediate Holdings, LLC (CON application #10708)** does not respond to this rule preference. However, the reviewer notes that grief/bereavement/support is briefly discussed separately, under the applicant's response in item E.3.b. of this report.

**(1) Proposed community education activities concerning hospice programs.**

**Affinity Care of Palm Beach LLC (CON application #10698)** again directs particular interest regarding this rule preference toward The Glades area, veterans, Jewish, Black and Hispanic residents of the area and those suffering from Alzheimer's/dementia (and their caregivers). These populations were discussed in the applicant's response to item E.1.a. of this report.

**Brevard HMA Hospice, LLC (CON application #10699)** bullets eight hospice benefits and points out that reaching patients early in the process and educating them allows patients to take full advantage of the eight bulleted benefits.

**Catholic Hospice, Inc. (CON application #10700)** bullets four major hospice topics that the applicant states Catholic Hospice is qualified to enhance knowledge and utilization of hospice services in Palm Beach County. Catholic Hospice also cites Catholic Health Care Transitions Services, Inc. – stated to be approved by the Centers of Medicare and Medicaid Services – is a community-based organization to provide care transition services aimed at reducing 30-day readmission rates to hospitals.

**Florida Hospice, LLC (CON application #10701)** bullets six discussion topics and the facilities, organizations and providers it will reach out to offer community education.

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** bullets 15 media and advertising locations it uses presently. The applicant identifies the dates (during 2018 to 2021) of 17 outreach locations. Other topics that are described are: MorseLife Speakers' Bureau, Multi-Media Centers and an annual "Shades of Gray" symposium (now in its 9<sup>th</sup> year, hosted by MorseLife).

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**Odyssey Healthcare of Marion County, LLC (CON application #10703)** lists a total of nine groups that it indicates traditionally underutilize hospice services. Odyssey maintains that it will provide a minimum of two educational programs per year intended to increase the awareness of the value of hospice services to individuals identified as traditionally underutilizing hospice services. Two topics specifically addressed are Continuing Education for Health Care Professionals and Physicians Need to be Talking to Patients about Hospice.

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704)** states that community education activities include meeting one-on-one with physicians and other health care professionals as well as formal education programs. ProMedica also references its related Schedule C conditions.

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)** briefly discusses the community education responsibilities/functions of the Community Relations Representative. The reviewer notes that for year one and for year two (in the applicant's Schedule 6A) there is a 1.0 FTE (for each year) for Community Relations.

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** cites its CON Exhibit 52-List of Seasons Educational Events and provides a table listing 2020 and 2021 educational events provided as continuing education during the COVID-19 pandemic.

**Suncrest Hospice Florida, LLC (CON application #10707)** references its Exhibit DD, stated to contain a list of education topics for community education and that are used by Suncrest internally for staff education. The reviewer notes that CON application #10707's last Book 2 of 2 exhibit is Exhibit CC (which is blank) and there is no Exhibit DD.

**Transitions Intermediate Holdings, LLC (CON application #10708)** does not respond to this rule preference.

**(m) Fundraising activities.**

**Affinity Care of Palm Beach LLC (CON application #10698)** comments that the Continuum Care Hospice Foundation (the Foundation) is a 501(c)(3) charitable organization and that the Foundation is run entirely by a team of volunteers and knowledgeable staff. Further, the vast majority of the Foundation's funds are generous gifts from former patients/families and Affinity will not actively raise funds from the community. However, if an individual desires to make a charitable donation, it will direct them to the Foundation.

**Brevard HMA Hospice, LLC (CON application #10699)** comments that Mederi Hospice will build the existing fundraising activities of LHC Group – most notably the Hospice Promise Foundation. Further, Mederi Hospice will be open to donations from area residents and corporations but is otherwise committed to supporting the needs of the hospice through corporate funds.

**Catholic Hospice, Inc. (CON application #10700)** explains that fundraising activities for Palm Beach County will be limited to the organization receiving memorial gifts on behalf of patients who have been served by the applicant. The applicant bullets seven examples of fundraising efforts by Catholic Hospice.

**Florida Hospice, LLC (CON application #10701)** indicates that it will be supported by The Residential Hospice Foundation (the Foundation), a non-profit separate entity established in 2012 by the parent organization (Graham). The Foundation is stated to provide support and financial assistance to patients and families impacted by terminal illness. The Foundation's mission is cited with additional narrative regarding community education, basic needs (for hospice patients with demonstrated financial need related to their hospice condition) and examples of what the Foundation has funded on the application's pages 62 and 63.

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** notes that as a non-profit organization, the MorseLife organization has an established fundraising program and many benefactors. Further, the MorseLife Foundation, Inc.

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(established in 1987) is focused on raising funds and managing fund assets. Fundraising activities are described and MorseLife lists 34 funding sources and a brief program description for each on the application's page 2-48.

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** maintains that it will not actively solicit donations but will provide a list of charitable giving options. Odyssey states that whenever a patient and/or a patient's family indicates a desire to make a donation reflecting their satisfaction and gratitude to Odyssey, they will be directed to 501-C3 non-profit foundations. The applicant briefly mentions "The Kindred at Home Foundation" and that Odyssey is committed to forgoing fundraising solicitations as long as it serves service area residents.

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704)** states:

- Being a not-for-profit
- Utilization of the following internal ProMedica funding sources to give back to the communities that ProMedica serves
  - Senior Care Fund
  - Memory Care Fund
  - Hospice Memorial Fund
- ProMedica does not plan on do fund raising activities in the service area

The application's Attachment 10 is referenced. ProMedica states several conditions that spell out how it is committing to provide resources and address the needs of the service area included in the applicant's Schedule C.

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)** points out that it does not actively raise funds from the community and therefore, does not compete with non-profit hospice organizations or other groups in obtaining funds from the community. PruittHealth contends that it will not dilute potential contributions available in the community or adversely impact existing hospice program fundraising efforts.



**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** states that it will not engage in fundraising activities and that any donations received will go to the Seasons Foundation - the non-profit foundation within the organization dedicated to providing a long-term benefit for all persons.

CON application #10706, Exhibit 60 is a letter from Gisele Crowe, Executive Director, Seasons Hospice Foundation, indicating that the foundation will provide funding for the conditions indicated in Schedule C.

**Suncrest Hospice Florida, LLC (CON application #10707)** directs the reviewer to Condition C.3. Special Programs-Condition #2.

**Transitions Intermediate Holdings, LLC (CON application #10708)** does not respond to this rule preference.

- b. Rule 59C-1.0355(8) Florida Administrative Code: Semi-Annual Utilization Reports. Each hospice program shall report utilization information to the Agency or its designee on or before July 20th of each year and January 20th of the following year.**

The following applicants directly respond that they will comply with this reporting requirement:

- **Affinity Care of Palm Beach LLC (10698)**
- **Brevard HMA Hospice, LLC (10699)**
- **Catholic Hospice, Inc. (10700)**
- **MorseLife Hospice Institute, Inc. (10702)**
- **ProMedica Hospice of Palm Beach County, FL, LLC (10704)**
- **PruittHealth Hospice – Southeast Florida (10705)**
- **Seasons Hospice & Palliative Care - Palm Beach County, LLC (10706)**
- **Suncrest Hospice Florida, LLC (10707)**

**Florida Hospice, LLC, Odyssey Healthcare of Marion County and Transitions Intermediate Holdings, LLC** do not directly respond that they will comply with this reporting requirement.

The reviewer notes that **ALL applicants** completed Schedule D-1 of the application in which it is certified that the applicant “will provide utilization reports to the agency”.

**3. Statutory Review Criteria**

- a. Is need for the project evidenced by the availability, quality of care, accessibility and extent of utilization of existing health care facilities and health services in the applicant’s service area? ss. 408.035(1), (2) and (5), Florida Statutes.**

As previously stated, in Volume 47, Number 152, of the Florida Administrative Register, dated August 6, 2021, need for one hospice program was published in SA 9C for the January 2023 hospice planning horizon. The co-batched applicants are applying in response to published need.

The following chart illustrates hospice admissions for the five-year period ending June 30, 2021. As shown below, with the exception of the 12-month period ending June 30, 2019 (which experienced a decrease of 357 admissions over the 12 months ending June 30, 2018), SA 9C’s total admissions increased every year from the 12 months ending June 30, 2017 (10,546 admissions) to the 12 months ending June 30, 2021 (11,732 admissions).

**Service Area 9C  
Hospice Admissions  
Five Years Ending June 30, 2021**

<b>12 Months Ending:</b>	<b>Admissions</b>
June 20, 2021	11,732
June 30, 2020*	11,230*
June 30, 2019	10,587
June 30, 2018	10,944
June 30, 2017	10,546

Source: Agency for Health Care Administration Florida Need Projections for Hospice Programs, issued September (2017 and 2018), October 2019 and August 2021

Note: \* Twelve months ending June 30, 2020 admissions from unpublished Agency data resulting from Emergency Order 20-004.

As previously stated in item E.1.a. of this report, SA 9C is currently served by:

- Hospice by the Sea Inc
- Hospice of Palm Beach County Inc
- Palm Beach Hospice of MorseLife
- VITAS Healthcare Corporation of Florida

Applicants typically reiterate portions (in whole or in part) in response to item E.1.a. again in this section (E.3.a.) of the application. **Each** co-batched applicant’s major need justification(s) is/are broadly summarized and very briefly described below or in item E.1.a. of this report.

**Affinity Care of Palm Beach LLC (CON application #10698)** indicates being, regarding availability and accessibility:

- The most appropriate co-batched applicant for a variety of reasons, such as having:
  - Successful start-up experience in both Broward County, continuous to the south and Sarasota County, to the northwest
  - Identified underserved population groups in the SA and has developed strategies to penetrate these population groups
  - The experience to lift-up minority and other population groups
  - Unique programming initiatives well-received by patients and referral sources
  - Service intensity that is meaningful and additional resources not currently available
    - Being a medium-sized, privately held hospice with vastly different services than those currently offered in the area
  - Plans to increase hospice awareness, enhance accessibility to hospice and ensure availability to hospice services for residents of the Glades region of the county
    - Establishing a satellite office in The Glades

Other reasons offered regarding availability and accessibility include:

- Promote hospice services to the Jewish population (with Affinity Care being a Jewish-owned company which recognizes and understands the unique needs of the Jewish population in end-of-life care)
- Work collaboratively with Wisdom Circle
- Collaborate with senior primary care centers
- Provide unique clinical programs such as
  - Affinity Cardiac Care
  - Affinity Pulmonary Care
  - Continuum Palliative Resources (including care for those with Alzheimer's Disease)

Regarding extent of utilization, Affinity Care points out that the greatest need or gap in hospice service is among the age 65+ population and particularly the age 65+ non-cancer group. Affinity Care further emphasizes the hospice need for the Black and Hispanic populations in the area. Further, Affinity Care will admit any patient who is clinically appropriate, regardless of age, disease, race, ethnicity and sexual orientation, with particular attention to all seniors, with and without

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cancer and minority groups who are underserved. Seven strategies previously shown in item E.1.a. of this report to address the needs of these populations are restated.

Affinity Care discusses its 'Affinity HomeCare HomeBase', which it indicates is utilized by all Affinity/Continuum hospice programs. The applicant briefly discusses quality of care, see item E.3.b. of this report. Affinity Care also responds to the Health Care Access Criteria.

**Brevard HMA Hospice, LLC (CON application #10699)** reiterates the Agency's promulgated need projection for SA 9C for the January 2023 hospice planning horizon.

Brevard contends that:

- None of the existing providers, or new providers, replicate LHC Group's deep post-acute care experience and expertise that complement hospice services along the care continuum
- LHC Group knows how to leverage its technology, clinical experiences and market presence to drive organic growth in market penetration rates to reach patients at the right time in their care journey for hospice services.

**Catholic Hospice, Inc. (CON application #10700)** reiterates the following summary for the need for the proposed project (these were also provided in CON application #10700, pages 7-11, 44-105 and in the applicant's response to Rule 59C-1.0335(4)(e), Florida Administrative Code (item E.2.a.(1) of this report:

- Demographic trends and expected growth
- Access and availability of hospice services
- Enhance access to disease-specific care
- Enhance access to ethnic community-specific care
- Enhance access to homeless and low-income population
- Enhance access to the veteran population
- Other specialized experience
  - Ability to enhance the continuum of care
  - Provider with extensive palliative programming
  - Ability to enhance access to transportation
  - Provider with extensive chaplaincy care offerings

Catholic states additional points to consider are that it:

- Is an experienced provider with existing resources
- Will expand myUnity by NetSmart – an electronic health record (EHR) to Palm Beach County

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- Is a not-for-profit organization and for-profit and not-for-profit hospice care have different practices, services and programs that may be important considerations when looking for end-of-life care
- Plans to develop relationship with local healthcare providers throughout the service area, including nursing homes and hospitals. Catholic Hospice will extend its existing agreement with Baptist Health South Florida (to including Bethesda Hospital East and Bethesda Hospital West) and Boca Raton Regional Hospital
- Is experienced in developing and planning comprehensive and ongoing education outreach

**Florida Hospice, LLC (CON application #10701)**, regarding availability, reiterates the Agency's fixed need pool for SA 9C for the January 2023 hospice planning horizon and that the proposed project will meet the published need. The applicant's response to quality of care is addressed in item E.3.b. of this report.

Regarding accessibility, Florida Hospice states being able to serve residents in all geographic areas of SA 9C. The applicant maintains programmatic accessibility with/for the following:

- Cancer Specialty Program
- Heart Failure Patients
- Dementia Patients

Concerning financial accessibility, CON application #10701 contends that Florida Hospice will admit all hospice appropriate patients, regardless of their financial resources or ability to pay, in part with assistance from the Residential Hospice Foundation.

Concerning cultural accessibility, CON application #10701 contends that Florida Hospice will draw from its culturally diverse existing hospice staff to recruit, screen, train and engage hospice staff who understand the unique and culturally specific issues related to end-of-life care in different racial, ethnic and religious populations.

Regarding extent of utilization of existing services, the applicant again reiterates the Agency's fixed need pool. Florida Hospice responds to the Health Care Access Criteria (pages 67-69 of the application). Florida Hospice also provides a narrative description under the heading of "Efficiency" (pages 66-67 of the application).

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** states that availability refers to how much of a resource exists such as how many hospice programs or

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how many inpatient hospice beds serve the market. MorseLife emphasizes that its existing teaching platform can increase hospice availability in the following ways:

- Utilizing the existing workforce of the MorseLife organization with the ability to expand quickly
- Increase the available, qualified hospice workforce through existing training initiatives
- Increase hospice service to residents of Palm Beach County, through name recognition, reputation and synergistic services

MorseLife notes it is in a unique position to utilize existing workforce already trained and equipped to serve SA 9C hospice patients. Internal programs that lead to increased opportunities for employees include:

- MorseLife Learning Institute
- MorseLife Leadership Academy
- CareerTrees Program

MorseLife states that with the expansion of its hospice program, MorseLife Hospice Institute will expand the Geriatric Fellow program of the teaching nursing home to introduce a hospice rotation to the curriculum. The applicant states offering internship opportunities and indicates a total of 25 teaching affiliations, including the healthcare discipline applicable to each affiliation (page 3-4, Table 3-1 of the application).

MorseLife contends having paved the way for a model teaching hospice program to advance hospice care and with published hospice need for SA 9C, the proposed project is poised to open its hospice program to all residents of Palm Beach County.

The applicant's response to quality of care is addressed in item E.3.b. of this report. MorseLife responds to the Health Care Access Criteria (pages 3-11 to 3-14 of the application).

Regarding access, MorseLife contends that its existing presence and involvement within the (SA 9C) community make the proposed project accessible throughout the service area upon award of the CON and license amendment. MorseLife further contends that as part of a comprehensive organization focused on caring for the elderly, infirm, disabled and disadvantaged, approval of the proposed project will improve accessibility by removing the current limitations for serving only the MorseLife retirement community.

The applicant provides a description of the extent of utilization on pages 3-8 through 3-10 of the application.

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** reiterates (in narrative form) the populations in Palm Beach County that it indicates (in its response to items E.1.a. and E.2.a.(1) of this report) as having unmet hospice needs. For convenience, primarily, these populations are identified as follows:

- Residents with end-stage heart disease
- The growing elderly populations, particularly individuals who are ages 65+, 75+ and 85+ (with those age 75+ especially recognized)
- Minority populations, especially Hispanic residents and Spanish speaking individuals (but also French, Portuguese and German speakers, as well as those who speak Yiddish or Hebrew)
- Individuals below or near the poverty line (including those who are below 200 percent and those who are below 300 percent of the poverty level)
- Homeless individuals and among these, those who are:
  - Sheltered
  - Unsheltered
  - Veterans

Odyssey also provide excerpts from its letters of support on pages 47-49 of the application.

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704)** reiterates the Agency's fixed need pool for one new hospice program in SA 9C, stating that project approval will enhance access to quality hospice care and offer additional services well beyond the core Medicare hospice benefits. ProMedica reiterates its letters of support in CON application #10704, Attachment 4.

ProMedica also states that it is committed to providing access to all patients without regard to ability to pay and that it will serve patients covered by Medicare, Medicaid, and other third-party payer programs, as well as self-pay and charity patients. The reviewer notes that the applicant's Schedule 7A indicates no patient days in year one or in year two for self-pay. See item E.3.g. of this report for further discussion.

Specialized staff training for staff working with individuals with Alzheimer's disease is briefly mentioned.

ProMedica's response to quality of care is addressed in E.3.b. of this report.

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Concerning accessibility, ProMedica states a dedication to removing barriers that hinder a patient's ability to access hospice benefit and reiterates CON application #10704's Attachments 9 and 10. ProMedica contends that access will be improved for minority populations and transients within SA 9C and reiterates the application's Attachments 9 and 12.

ProMedica asserts that the applicant will address the specific needs of patients who are under age 65. The reviewer notes that the applicant does not identify under age 65 Palm Beach County residents as a population experiencing unmet hospice needs (see ProMedica's response to item E.2.a.(1) of this report).

Regarding extend of utilization, ProMedica maintains that the fixed need pool calculation indicates that in SA 9C, there will be 430 additional patients in the service area by 2023. The reviewer notes that the Agency's Florida Need Projections for Hospice Programs, issued August 6, 2021 and revised August 18, 2021, indicates that projected hospice patients (1/23-12/23) has a 'projected minus current' of 467 for SA 9C.

ProMedica states on page 37 of the application, that, "The proposed project will enhance the availability, quality of care, efficiency, and accessibility of hospice services within Service Area 9C." On page 38 of the application, under the heading of "Efficiency", ProMedica bullets 14 services it indicates can be shared by existing ProMedica providers and the SA 9C hospice.

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)** reiterates discussion of penetration rates among existing hospice programs in SA 9C, as well as statewide penetration rates. The applicant responds briefly to the Health Care Access Criteria (page108 of the application).

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** reiterates the Agency's fixed need pool for an additional hospice program in SA 9C. Seasons also reiterates (from items E.1.a and E.2.b.(1) of this report) the populations in SA 9C that Seasons has determined to have unmet hospice need or is otherwise experiencing barriers to hospice care.

**Suncrest Hospice Florida, LLC (CON application #10707)** defines availability according to the Global Health Workforce Alliance and reiterates its response to E.1.a. concerning populations underserved and current hospice patients in SA 9C receiving a lack of adequate hospice services.



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Suncrest Florida also addresses availability according to the Institute of Medicine (US) Committee on Monitoring Access to Personal Health Care and reiterates plans to locate a hospice office in Belle Glade, ZIP Code 33430. The reviewer notes that CON application #10707 conditions for two locations: Belle Glade and Palm Beach.

The applicant points out that having an office location in Belle Glade, ZIP Code 33430 meet its goals of:

- Reducing barriers for patient populations currently underutilizing hospice services
- Recruiting multilingual and culturally competent local staff and volunteers to work in their own communities
- Implementing partnerships with community-based organizations to address impediments to securing accessible care including development of culturally sensitive hospice educational materials

The applicant's response to quality of care is addressed in item E.3.b. of this report.

Suncrest also provides a description of extend of utilization (page 119 of the application). The reviewer notes that in this response, the applicant references "Table 5", which the applicant states is titled "Annual Current Palm Beach County Hospice Activity". The reviewer notes that the applicant's Table 5 (page 30 of the application) is titled "Suncrest California Distribution of Staff by Race/Ethnicity".

Suncrest Florida responds to the Health Care Access Criteria on pages 132-134 of the application.

**Transitions Intermediate Holdings, LLC (CON application #10708)** references its statutory review criteria of "408.035(1)(a) and (b), F.S." which has been revised as shown at the beginning of item E.3.a.

Transitions contends that due to programmatic accessibility challenges in the area, the following five groups are underserved and have unmet hospice needs:

- Individuals with End-Stage Cardiac Disease
- Individuals with End-Stage Pulmonary Disease
- Individuals with Dementia Disease
- Individuals with Alzheimer's Disease
- Veterans

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The reviewer notes that in addition to the above, in item E.2.a.(1) of this report, Transitions had combined dementia/Alzheimer's into a single category of unmet hospice need in the area and had also included two categories not stated here:

- Persons with cancer
- Persons with renal disease

Regarding geographic accessibility, CON application #10708 states that SA 9C includes three counties and that the applicant has taken into consideration the needs of each county and its residents and will provide personalized services in each geographic area (page 68 of the application). However, SA 9C is a single county hospice service area - Palm Beach County.

Transitions also briefly discusses financial accessibility and extent of utilization. Regarding financial accessibility, the reviewer notes that the applicant states agreeing to the provision of at least five percent annually of total patient days to patients who are reimbursed under traditional Medicaid, Managed Medicaid, or uncompensated care. The reviewer notes that according to the applicant's Schedule 7A, when self-pay, Medicaid and Other Indigent are added together, separately for year one and for year two, the following percentages are attained:

- Year one – 5.11 percent
- Year two – 1.69 percent

The reviewer notes that in year one, the applicant's Schedule 7A exceeds the five percent threshold (by 0.11 percent) but in year two misses the five percent threshold (by 3.31 percent).

**b. Does the applicant have a history of providing quality of care? Has the applicant demonstrated the ability to provide quality care? ss. 408.035(3), Florida Statutes.**

The Agency maintains a Hospice Quality Reporting Program (HQRP) website at <https://www.floridahealthfinder.gov/Hospice/Hospice.aspx>.

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In this website, the Agency shares hospice quality characteristics through the following Centers for Medicare and Medicaid Services' reporting requirements found in the assessment sources and survey instruments of:

- CAHPS® (Patients and Family Experience Measures-Consumer Assessment of Healthcare Provider and Systems)
- HIS (Quality of Patient Care Measures-Hospice Item Set)

The timeframes for CAHPS® and for HIS are as follows:

- CAHPS® - January 1, 2018 through December 31, 2019
- HIS – January 1, 2019 through December 31, 2019

Below is the publicly available HQRP information, as presented in the referenced website for each of the co-batched applicants (or the parent/manager and corresponding affiliates), with current licensed hospice operations in Florida.

**CAHPS Data  
January 1, 2018 through December 31, 2019  
for the Co-Batched Hospice Providers**

Applicant Hospice Provider	Measures								
	Communication With Family	Getting Timely Help	Treating Patient with Respect	Emotional and Spiritual Support	Help for Pain and Symptoms	Training Family to Care for Patient	Caregiver Rated the Hospice 9 or 10	Willing to Recommend this Hospice	Average Score
Brevard	81%	79%	90%	92%	72%	72%	86%	90%	83%
Catholic	73%	71%	84%	84%	71%	71%	75%	76%	76%
Ody/Kindred	77%	75%	88%	90%	72%	70%	79%	79%	79%
ProMedica	77%	73%	89%	90%	71%	69%	78%	81%	78%
Seasons	72%	70%	83%	84%	72%	65%	69%	74%	74%
State Average	78%	75%	88%	89%	73%	70%	80%	84%	80%

Source: <https://www.floridahealthfinder.gov/Hospice/Hospice.aspx>, as of October 5, 2021

Note: See the HIS table below for the applicants' services areas included in these ratings.

The co-batched applicants with licensed Florida hospices Quality of Patient Care Measures-Hospice Item Set's rating on patients who got an assessment on all seven HIS quality measures are shown below.

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<b>Hospice Provider/SA Facility/City</b>	<b>Patients Who Got an Assessment of All 7 HIS Quality Measures</b>
Brevard (Wuesthoff)	
SA 7A/Rockledge	98.2%
Catholic	
SAs 10, 11/Miami Lakes	99.6%
Odyssey/Kindred at Home Affiliates	
SA 1/Pensacola SA 2A/Panama City SA 7B/Orlando SAs 3B, 4B, 11/Miami	
Average	98.3%
ProMedica f/k/a Heartland	
SA 4A/Jacksonville SAs 10 & 11/Plantation	
Average	98.3%
Seasons	
SA 5A/Wesley Chapel (N/R) SA 5B/Clearwater SA 6A/Tampa SA 10/Dania Beach SA 11/Miami-Dade	
Average	92.7%
<b>State Average</b>	<b>96.4%</b>

Source: <https://www.floridahealthfinder.gov/Hospice/Hospice.aspx>,

As of October 8, 2021, the CMS.gov website indicates there are nine HIS Quality Measures.

**Affinity Care of Palm Beach LLC (CON application #10698)** begins by reiterating that it is a development stage corporation, established for the purpose of initiated hospice service in SA 9C and has no operational history. However, Affinity comments that Affinity/Continuum, through its existing and past affiliate agencies, has been providing quality hospice care since 2015.

The applicant briefly discusses beginning licensure dates and Community Health Accreditation Partner (CHAP) accreditation for its two affiliate Florida hospices - Continuum Care of Broward LLC and Continuum Care of Sarasota LLC.

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Affinity provides two bar charts (pages 193 and 194) to indicate that, based on its previous CON application estimates:

- Continuum Care of Broward LLC (in its first 10 months of operation) has met its CON forecasted admissions/average daily census (16.35 actual compared to 16.39 forecasted) and patient days (4,970 actual compared to 4,982 forecasted)
- Continuum Care of Sarasota LLC (in its first three months of operation) has surpassed expectations year to date both in CON forecasted admissions/average daily census (604 actual compared to 2.45 forecasted) and patient days (556 actual compared to 225 forecasted)

Affinity emphasizes that meeting or exceeding the CON projections in both of the above operations is particularly commendable, considering that the forecasts were completed prior to the COVID-19 pandemic or even knowledge or recognition of it.

Affinity maintains that:

- Florida hospice affiliates (Continuum Care of Broward LLC and Continuum Care of Sarasota LLC) have robust quality assurance and performance improvement (QAPI) Plans in place
- The proposed project will develop and maintain a QAPI program that will be similar to its affiliates
- The proposed project will be a seamless expansion of Continuum Care of Broward LLC into Palm Beach County

The QAPI Plan is further discussed in detail (pages 197-199 of the application). Additionally, continuing education/in-service training and CHAP accreditation is further narrated (pages 199 and 200 of the application).

The applicant reiterates services intensity and unique/specialty programming to enhance quality (pages 196 and 197 of the application). See Affinity's response in item E.1.a. of this report.

Agency records indicate that, as of October 25, 2021, Affinity Care affiliate Florida hospices, both having less than three-years of licensed operations, have had no substantiated complaints, since their licensed operations began.

**Brevard HMA Hospice, LLC (CON application #10699)** reiterates that the following factors support the applicant's/parent's quality of care history:

- LHC Group's history, licensure, quality and accreditation and that Mederi Hospice will be building on LHC Group's operations

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- Letters of support are a testament to the organization’s quality and reputation

The applicant provides a background (pages 16-19) with the following quality headings:

- National Leader in Hospice and Post-Acute Care with a Local Focus
  - Local focus
  - National presence/experience
  - Highly capable executive leadership
- Best-in Class Services
  - Quality
  - Diverse post-acute care experience and services
  - Population health initiatives
  - Unique partnership experience
- Human Capital Resources
- Robust Financial Resources
- Leading Technology Platforms
  - HomeCare HomeBase
  - Medscope
  - Medalogix
  - Strategic HealthCare Programs (SHP)
- Hospice Promise Foundation Support
- Prepared for the Future of Hospice/Post-Acute Care

The above major quality headings are further delineated in greater detail on pages 20-58 of the application.

The applicant maintains that LHC Group’s services can be broadly classified into the following five principal segments, with narrative offered for each (pages 25-33 of the application):

- Home health services
- Hospice services
- Home and community-based
- Facility-based services offered through affiliated LTACHs
- Healthcare Innovation Services or HCI

Comment is provided regarding the LHC Group’s Quality Assurance and Performance Improvement (QAPI) Department.

Under the major heading “Hospice Service Line Aggregate Results 2020”, Brevard briefly discusses CAHPS and HIS measures and provides a stated May 2020 to August 2020 CHAPS quality measurement table – stating to compare CAHPS scores for LHG Group from May 2020 to

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August 2020. The reviewer notes that these dates are more recent than the data available to the Agency. In the table below, the reviewer:

- Reproduces the portion of the Agency’s most available CAHPS quality scores for Brevard (SA 7A)
- Overlays the stated August 2020 CAHPS scores (rounded to the nearest whole number)

**CAHPS Data  
Brevard (January 1, 2018 through December 31, 2019) and  
LHC Group (August 2020)**

Co-Batched Applicant Hospice Provider	Measures								
	Communication With Family	Getting Timely Help	Treating Patient with Respect	Emotional and Spiritual Support	Help for Pain and Symptoms	Training Family to Care for Patient	Caregiver Rated the Hospice 9 or 10	Willing to Recommend this Hospice	AVG Score
Brevard	81	79	90	92	72	72	86	90	83
LHC Group	84	82	92	91	*	*	84	87	*

Source: <https://www.floridahealthfinder.gov/Hospice/Hospice.aspx>, as of October 5, 2021 and CON application #10699, pages 35 and 36 (partially reproduced)

Note: \* The applicant did not provide scores for these measures.

The applicant directs the reviewer to the application’s Appendix IV (CAHPS Score vs. SHP Benchmark Detail) indicating that these results are for a 12-month period but offers no additional explanation or description. The reviewer notes according to CON application #10699, page 505 (the first page of the applicant’s Appendix IV), the time period is 12/01/2019 – 11/30/2020, with a report date of 3/23/2021. Again, according to the applicant’s SHP Scores and Benchmarks data (page 505 of the application), LHC Group has the following quality measure scores:

**SHP Scores and Benchmarks  
12/01/2019 – 11/30/2020  
LHC Group, Inc.**

LHC Group, Inc.	Measures								
	Communication With Family	Getting Timely Help	Treating Patient with Respect	Emotional and Spiritual Support	Help for Pain and Symptoms	Training Family to Care for Patient	Caregiver Rated the Hospice 9 or 10	Willing to Recommend this Hospice	Overall Composite
Actual	86%	82%	93%	94%	81%	80%	89%	89%	86%
Ranking	70%	71%	63%	64%	73%	74%	70%	66%	74%
SHP National	82%	76%	91%	91%	76%	74%	85%	8%5	82%

Source: CON application #10699, Appendix IV, page 505

Agency records indicate that for the three-year period ending October 25, 2021, the applicant’s sole Florida hospice provider in SA 7A had no substantiated complaints.

**Catholic Hospice, Inc. (CON application #10700)** is an existing, non-profit, faith-based, Florida hospice provider in SAs 10 and 11. The applicant indicates that Catholic Hospice is widely recognized throughout South Florida as a quality hospice provider serving patients of all denominations.

Catholic Hospice's quality assurance and performance improvement program (QAPI) is extensively described (pages 168-172 of the application). Further, performance improvement activities focus on high-risk, high-volume or problem-prone areas that affect palliative care outcomes, patient safety and quality of care with a consideration of incidence, prevalence and severity of problems in those areas. Further, these activities track adverse patient events, analyze their causes, and implement preventive actions and mechanisms that include feedback and learning throughout the hospice.

Major QAPI headings with narrative for each include:

- Patient Health Care Information (including 18 bulleted health information records)
- Confidentiality of Health Care Information
- Complaint Resolution
- Adverse Events (including eight bulleted reportable events)
- Auditing and Monitoring – including
  - 11 bulleted components of the hospice program that are regularly audited
  - 12 bulleted components of the compliance program that are regularly audited and monitored by the Director of Clinical Care
- Activities and Projects

Catholic Hospice indicates that as of September 2021, it has the following HIS measurement scores and compares these to the national average.



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**HIS Comprehensive Assessment Measures  
Catholic Hospice vs. National Average**

	<b>Catholic Hospice</b>	<b>National Average</b>
Patients who got an assessment of all 7 HIS quality measures at the beginning of hospice care to meet the HIS Comprehensive Assessment Measure requirements	99.6%	88.7%
Patients or caregivers who were asked about treatment preferences like hospitalization or resuscitation at the beginning of hospice care	100.0%	99.3%
Patients or caregivers who were asked about their beliefs and values at the beginning of hospice care	100.0%	97.6%
Patients who were checked for pain at the beginning of hospice care	99.7%	97.1%
Patients who got a timely and thorough pain assessment when pain was identified as a problem	99.7%	92.6%
Patients who were checked for shortness of breath at the beginning of hospice care	100.0%	98.6%
Patients who got timely treatment for shortness of breath	100.0%	96.8%
Patients taking opioid medication who were offered care for constipation	100.0%	94.4%

Source: CON application #10700, page 173, Figure 47 from <https://www.medicare.gov/care-compare>

The reviewer notes that Catholic Hospice’s HIS measure score was previously reviewed by the Agency earlier in this section of the report. Additionally, the reviewer notes that Catholic Hospice’s 99.5 percent score as shown in the above table is consistent with Agency’s table earlier in this section.

Catholic Hospice points out having accreditation as follows:

- National Institute for Jewish Hospice
- Veteran Level 4, within the National Hospice and Palliative Care Organization (NHPCO)
- Membership in good standing with the Florida Assisted Living Association (FALA)

Agency records indicate that for the three-year period ending October 25, 2021, Catholic Hospice’s SA 10 and 11 hospice operations had a total of one substantiated complaint, under the category of resident/patient/client rights.

**Florida Hospice, LLC (CON application #10701)** begins by reiterating that Florida Hospice is:

- A development stage Florida entity (providing an organizational chart on pages 5 and 70 of the application)
- Parented by Graham

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- Affiliated with five Graham hospice agencies in three states having:
  - Accreditation by the Accreditation Commission on Healthcare - with agencies in northern and central Pennsylvania pending accreditation

Florida Hospice states a source of Strategic Healthcare Programs, HQRP and CAHPS Analysis January-June 2021 in providing a HIS quality measure table (page 71 of the application) and a CAHPS quality measure table (page 72 of the application) to show the respective scores of all of Graham's hospices. Florida Hospice states that all of Graham's hospice agencies:

- Exceeded CMS national benchmarks on quality scores for each of eight HIS measures
- Overall scored favorably compared to CMS national benchmarks on CAHPS measures

The reviewer notes that upon perusal of CON application #10701's page 72 table – CMS CAHPS Quality Scores for Graham Hospices vs. National Benchmark, the reviewer notes that this table indicates that the national average score for “Willingness to Recommend Hospice” was for 85 percent for Graham Hospices.

Florida Hospice maintains that Graham has a robust quality assurance and performance improvement (QAPI) Program, designed to measure and continuously work on performance and process improvement to achieve the best possible patient care.

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)**, as stated previously, is an existing and operational hospice provider in SA 9C. MorseLife points out how expansion of its existing hospice program to the rest of Palm Beach County will enhance research initiatives among the following three providers (with a brief description of each three) that will have greater impact to benefit hospice patients (pages 3-6 and 3-7 and again on page 4-4 of the application):

- Arthur and Vicki Loring Research Institute

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- University of Miami-Jackson Memorial Geriatric Fellowship Program
- MorseLife Cannabinoid Program

Additional hospice research performed at or through MorseLife with the Stein Gerontological Institute is described along with other related research (pages 4-4 to 4-7 of the application).

MorseLife shares its mission, vision and core values on page 4-2 of the application and states it uses NHPCO’s ten components of quality in hospice care on the application’s page 4-3.

MorseLife cites its CAHPS quality scores (1/1/2018 to 12/31/2019) for all four of the existing hospice programs in SA 9C – including Palm Beach Hospice by MorseLife. The reviewer notes that the applicant does not indicate a website run date for the referenced CAHPS table that MorseLife provides. The reviewer reproduces only the applicant’s, Florida and US scores (as indicated in the applicant’s table) and does not reproduce the other existing three hospice programs in SA 9C. See the partially reproduced table below.

**CAHPS Data  
Palm Beach Hospice by MorseLife, State and US Scores  
January 1, 2018 through December 31, 2019**

Hospice Entity/ Florida/ US	Willing to Recommend this Hospice	Communication With Family	Getting Timely Help	Treating Patient with Respect	Emotional and Spiritual Support	Help for Pain and Symptoms	Training Family to Care for Patient	Caregivers Rated the Hospice 9 or 10
MorseLife	89%	81%	80%	92%	94%	76%	75%	83
Florida	84%	78%	75%	88%	89%	73%	71%	79
US	84%	81%	78%	91%	90%	75%	76%	81

Source: CON application #10702, page 3-6, Table 3-2 and page 4-8, Table 4-1 (both partially reproduced)

The reviewer notes that according to MorseLife’s table above, when compared to the referenced quality measure and Florida overall, MorseLife:

- Exceeded each of the eight quality measures
- Exceeded six of the eight referenced quality measures
- Matched one of the eight referenced quality measures
- Fell short (by one percent) for one of the eight quality measures when compared to the US overall

The reviewer notes further that particularly regarding “Willingness to Recommend this Hospice”, MorseLife had a score of 89 percent, compared to Florida’s and all US hospice’s averages of 84 percent.

MorseLife states on the application’s pages 4-8 and 4-9 that services central to the hospice program include:

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- Electronic Medical Records or EMR (with MorseLife currently using NetSmart at its hospice and home health agency)
- Rabbinical services
- Complementary services (four are listed)
- Community-based support groups (already in operation in Palm Beach County)

MorseLife also provides narrative and bulleted descriptions under the major headings of End of Life Care Education and MorseLife’s Programs that Positively Impact Quality of Care in Hospice.

Agency records indicate that for the three-year period ending October 25, 2021, Palm Beach Hospice by MorseLife had no substantiated complaints.

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** is parented by Kindred at Home, which has hospice programs in SAs 1, 2A, 3B, 4B, 7B, and 11.

CON application #10703 indicates a source at CMS Hospice Quality Reporting Program Data on Care Compare (identifier 252m-zfp9), released July 7, 2021 and accessed October 17, 2021, to reflect each of eight HIS quality measure scores for Odyssey/Kindred at Home compared to a Florida average. The reviewer reproduces only the applicant’s stated “Patients who got an assessment of all seven HIS quality measures” scores. See the partially reproduced table below:

**Odyssey and Kindred at Home HIS Performance Data**

	Florida State Average	Odyssey Average	Kindred at Home Overall Florida Average	Better Than State Average	
				Odyssey	Kindred at Home
Patients who got an assessment of all 7 HIS quality measures	94.2%	97.8%	98.3%	Yes	Yes

Source: CON application #10703, page 50, Table 24 (partially reproduced)

The reviewer notes that Odyssey/Kindred at Home’s HIS measure scores were previously reviewed by the Agency earlier in this section of the report and the Odyssey/Kindred at Home average score was 96.8 percent which is less than the stated Odyssey average (97.8 percent) as well as less than the stated Kindred at Home overall Florida average (98.3 percent).

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Odyssey notes that CMS recently developed a new hospice quality measure – the Hospice Care Index (HCI) which it contends was developed to address capturing quality measures throughout the hospice stay which it contends is limited by HQRP, HIS and CAHPS measures. Odyssey provides a table (CON application #10703, page 51, Table 25) in which indicates the Odyssey and national average scores for four HCI measures. The reviewer notes that Odyssey HCI scores are greater than national average percentages for three of the four HCI measures and is same percentage for one of the four HCI measures.

Regarding accreditation, Odyssey states that it is accredited by the Accreditation Commission for Health Care (ACHC) for all of Kindred's Florida operations. The applicant also discusses the Kindred National Hospitalization Avoidance Program on page 51 of the application. Odyssey describes its QAPI program, listing eight goals that it seeks to strive to achieve through its QAPI program. Odyssey also lists 17 functions and bullets eight principals focused through the QAPI program.

Odyssey maintains that resources for caregivers and staff (with narratives descriptions include infrastructure and technology to reduce administrative burden, staffing optimization to alleviate clinician burnout and differentiated career development opportunities.

Agency records indicate that for the three-year period ending October 25, 2021, Odyssey/Kindred at Home's Florida hospice programs had two substantiated complaints, both citing the category of administration/personnel.

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704)** explains that its parent, The Systems, is a national provider of hospice, home health, assisted living, rehabilitation and nursing home services. The applicant's quality of care response is not specific and does not directly address its hospice programs. ProMedica lists a total of 26 facilities nationwide (with two nursing homes in Florida) stated to have ..."Overall 5 Star Ratings":

- ManorCare Health Services, Dunedin
- ManorCare Health Services, Palm Harbor

The reviewer notes that both of the bulleted SNFs listed above are located in Pinellas County (outside of the boundaries of SA 9C).

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ProMedica lists a total of 42 facilities nationwide (with the following five being in Florida) that are stated to have...”Overall 5 Star Ratings in the area of Quality Measures”:

- ManorCare Health Services, Dunedin
- ManorCare Health Services, Sarasota
- ManorCare Health Services, Boca Raton
- ManorCare Health Services, Palm Harbor
- ManorCare Health Services, Ft. Myers

The reviewer notes that one of the five bulleted SNFs is located in SA 9C - ManorCare Health Services, Boca Raton.

The application’s Attachment 3 is documentation to reflect Agency licensure records of affiliated hospice providers, nursing homes and ALFs in Florida. Further, the applicant references Attachments 2, 5, 8, 9, 10, 12 and 14 to reflect more proof of the high quality and accreditations that The Systems will bring to SA 9C.

Agency records indicate that, for the three-year period ending October 25, 2021, the parent’s affiliated hospice programs had no substantiated complaints.

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)** lists a total a 35 “Best Practices” at PruittHealth hospice (pages 13-15 of the application) and provides a table to describe where hospice and palliative care differ or are the same (application’s page 19, Figure 7). Additionally, the applicant provides the PruittHealth Model of Care (application’s page 52, Figure 33) and offers a brief narrative of the model’s five components. Further, a diagram of the PruittHealth Continuum of Care is provided (application’s page 110, Figure 75).

PruittHealth cites participation in (and that it can track and trend) quality outcome measures to assess clinical and performance indicators, through the Strategic Healthcare Programs data analysis system. The applicant also indicates that PruittHealth Hospice participates in CAHPS and HIS.

PruittHealth indicates a source of HQRP and HCAHPS to indicate that for the 12 months ending June 30, 2020 (most recently available data), PruittHealth Hospice exceeded the national average in 13 of 16 quality-related metrics, some of which include: (page 111, Figure 76 of the application):

- Overall Rating of Hospice
  - PruittHealth 2019 (85.0 percent) and 2020 (83.0 percent)
    - National average of 81 percent

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- Comprehensive Assessment
  - PruittHealth 2019 (90.8 percent) and 2020 (93.5 percent)
    - National average of 88.7 percent
- Visits in the Last 3 Days by an RN
  - PruittHealth 2019 (90.8 percent) and 2020 (92.1 percent)
    - National average of 82.6 percent
- Getting Timely Care
  - PruittHealth 2019 (77.0 percent) and 2020 (79.0 percent)
    - National average of 78.0 percent
- Getting Help for Symptoms
  - PruittHealth 2019 (78.0 percent) and 2020 (76.0 percent)
    - National average of 75.0 percent

The reviewer notes that the five bulleted measures above were those expressly listed by PruittHealth in its response to item E.3.b. of this report.

The Agency notes that upon further review of CON application #10705, page 111, Figure 76, the following is of note:

- Would Recommend Hospice
  - PruittHealth 2019 (82.0 percent) and 2020 (81.0 percent)
    - National average of 84.0 percent

PruittHealth maintains that in 2002, PruittHealth began its “Committed to Caring” campaign and the applicant provides the following (page 112 of the application):

- Mission
- Vision
- The Commitment to Caring Pledge

PruittHealth offers discussion of the following quality of care characteristics (pages 113-119 of the application):

- Corporate Standards
- Memberships
- PruittHealth
  - Consulting Services
  - Pharmacy
- CMS Quality Improvement Organization
- Satisfaction Surveys (with benchmarks purchased from *My InnerView*)
- The Joint Commission
- PruittHealth
  - Quality Report

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- Quality Assurance and Performance Improvement (QAPI) and various QAPI staff and their responsibilities
- Staffing, Training and Career Development
  - Pruitt University
  - C N A Career Ladder
  - Leadership Mirroring
  - Bi-Annual Leadership Conference
  - Orientation for Professional Nurses
  - CPR Instructor Training
  - The Green Sweep Program

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** contends that Seasons brings the following advantages of quality and experience to the proposed SA 9C hospice program (page 14 of the application):

- Proven ability to quickly grow new programs
- Corporate management services with proven policies, procedures, and training
- Accreditation through the Joint Commission or CHAP
- Proven ability to improve access to hospice services by increasing admissions for underserved populations
- Proven ability to develop hospice programs and services tailored to specific local needs

Seasons provides a diagram titled, “Why Is Seasons the Best Hospice for 9C” (page 17 of the application) and a bar chart (page 18 of the application), indicating Seasons’ year one and year two, projected and actual, admissions in SAs 5A, 5B, 6A and 10.

Seasons bullets (pages 135-136 of the application):

- Nine accreditations/certifications
- The 10 NHPCO’s Ten Components of Quality in Hospice Care
- The eight “TRUE HOPE” values

Seasons offers the diagram of the Seasons Hospice *Circle of Care* (page 138 of the application). Other features of quality are also discussed (pages 139-142 of the application).

Season explains its Quality Assurance and Performance Improvement (QAPI) Program and offers a description of the following three additional quality improvement initiatives:

- Electronic Medical Record (EMR) Reeducation
- Symptom Management Data
- CAHPS Improvement Initiative



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Specific to CAHPS improvement initiative, Seasons explains that when HIS and CAHPS data for November 2020 showed Seasons quality scores did not reflect the feedback local hospice teams were receiving from patients and families, Seasons did not wait until another CAHPS or HIS survey publication. According to the applicant, Seasons engaged Hospice Advisors to conduct an additional 10-questions telephone survey (page 146 of the application). According to Seasons, some characteristics about the 10-question telephone survey are:

- 1,472 phone numbers of active Florida hospice patients/families
- Interviews between September 8 and October 13, 2021
- Questions 1-9 (closed-ended) had 599 respondents
- Question 10 (open-ended) had 576 respondents

Seasons provides a table regarding the tabulated results (page 147 of the application). The applicant explains that Seasons is using the responses and comments to improve procedures, training and supervision for Seasons Florida hospice staff.

However, Seasons survey result (question 10 - If you had a friend who was facing the death of a loved one as you are now, would you tell them about Seasons?" had zero yes and zero no and 57 not sure responses, with 519 'comments'. Comments were stated to indicate that they respondent gave comments but did not give a yes or no response. While the applicant indicates this is an open-ended question, Seasons 'willing to recommend this hospice' CAHPS score is 74 percent compared to the Florida and national hospices average of 84 percent. The survey question does not indicate an upgrade in Seasons' low 'willing to recommend this hospice' score.

Seasons offers narrative regarding:

- Circle of Care Calls
- Bereavement Support Assessment
- Employee Satisfaction Surveys

Agency records indicate that for the three-year period ending October 25, 2021, Seasons' Florida hospice affiliates had one substantiated compliant with two categories cited, Quality of Care/Treatment and Resident/Patient/Client Rights.

**Suncrest Hospice Florida, LLC (CON application #10707)** responds to this statutory rule criterion throughout the application, but particularly on pages 47-50 and 119-127 of the application. The applicant states that it will apply for Community Health Accreditation Partner (CHAP) accreditation. (See CON application #10707, Schedule C, C.3. Special

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Programs/Condition #6-Bullet #1). The reviewer notes that pursuant to ss. 408.043(3) Florida Statutes, such accreditation cannot be conditioned.

Suncrest indicates it utilized Trella Marketscape for Hospice (accessed October 18, 2021) to indicate that the parent’s hospice programs have lower 30-day readmissions rates and any of the existing hospice programs in SA 9C (page 50, Chart 6 of the application). The reviewer notes that the applicant does not provide a chart, data or a source to reflect the parent’s 30-day readmission rates compared to any of the co-batched applicants.

Suncrest states it has a library of customized, proprietary patient and staff programs, including as an example, its Virtual Dementia Training Program (see CON application #10707, Schedule C).

Suncrest Florida utilizes the Hospice Item Set Performance Report, August 31, 2021 in offering a bar chart (CON application #10707, page 122, Chart 8) to reflect four different quality measures for Suncrest, national averages and Palm Beach providers. Suncrest provides performance percentages and national averages for each of eight HIS quality measures. The reviewer reproduces below only the comprehensive assessment scores provided by the applicant.

**HIS Quality Measures**

<b>Quality Measure</b>	<b>Suncrest Performance</b>	<b>National Average</b>
Comprehensive Assessment	98.7%	90.3%

Source: CON application #10707, page 120, Table 19 (partially reproduced)

The reviewer notes that Suncrest Florida does not specify the timeframe to which the results apply. Suncrest’s Table 20-HIS Quality Measures by Location on the application’s page 121 shows five separate HIS scores for each of 13 Suncrest locations in states where Suncrest has operations.

Suncrest also provides discreet Suncrest performance percentages and national averages for each of seven CAHPS survey scores. The reviewer reproduces below only the “Willingness to Recommend Suncrest” scores.

**CAHPS Survey Quality Measures**

<b>Quality Measure</b>	<b>Suncrest Performance</b>	<b>National Average</b>
Willingness to Recommend Suncrest	88%	84%

Source: CON application #10707, page 121, Table 21 (partially reproduced)

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Suncoast Florida states survey results are published quarterly on the Compare Care website at [www.medicare.gov](http://www.medicare.gov). The reviewer notes that Suncrest Florida does not state the timeframe to which the results apply. Suncrest Florida reiterates several of its Schedule C conditions on pages 122-125 of the application.

**Transitions Intermediate Holdings, LLC (CON application #10708)** bullets a total of eight reasons that according to the applicant set Transition apart from the rest through its staffing capabilities (duplicated on pages 16, 66 and Schedule 6 notes, CON application #10708).

Transitions discusses the following (pages 7-9 of the application):

- Transition Mission
- Transition Hospice Commandments (three fundamental principals)
  - Commit to Hospice
  - Each Patient is Unique
  - Always Do the Right Thing
- Tenets (Acceptance, Empowerment, Peace and Freedom)

Transitions emphasizes the profound belief that no individual should die alone – ever.

The applicant describes the interdisciplinary care team structure, support and cadence (pages 12-14 of the application).

The applicant provides a Palliative Care Program Model (page 31, Exhibit 6 of the application). The reviewer notes that through CON application #10708 does not offer a source and does not offer a time frame or issuance date, Transitions provides diagrams to reflect Transitions palliative care outcomes pertaining to the following end-stage/terminal illnesses (pages 32-36 of the application):

- COPD (Exhibit 7)
- Heart Failure (Exhibit 8)
- Neuro-Cognitive (Exhibit 9)
- Oncology (Exhibit 10)
- Renal (Exhibit 11)

Per the applicant, Transitions Hospice has continuously received Community Health Accreditation Partner's (CHAP's) "Excellence" award in all of its active areas of care. Transitions explains that this level of care will continue to be put forward in Florida if the project is approved. The applicant includes a copy of a July 27, 2020 CHAP 2020 Accreditation Letter (page 39, Exhibit 13 of the application), indicating

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that Transitions Hospice, LLC d/b/a Transitions Hospice (in the State of Illinois) was found to be in compliance with the CHAP Standards of Excellence (site review dates of June 8, 2020 to June 12, 2020).

The reviewer notes that Exhibits 14-16 (on the applications pages 40-42) indicate a CHAPS rating for various quality measures. The applicant's Exhibit 14-Overall Rating of Hospice Care, indicates that Transitions Hospice of Central Illinois received the following ratings:

- 85 percent-overall rating of hospice care compared to
  - National rating of 85 percent
  - State of Illinois rating of 82 percent
- Would You Recommend This Hospice?
  - 85 percent (definitely yes)
  - 15 percent (probably yes)

Concerning diversity, the applicant explains that all Transitions subsidiaries are committed to creating an inclusive work environment the welcomes the ideas of all cultures and backgrounds. Further, Transitions Hospice employees are (page 48 of the application):

- 39.3 percent minority
- 90.3 percent female
- 43.7 percent millennial

Transitions states a recognition and an understanding that there is no place like home and offers the full spectrum of services of care for every patient wherever they reside.

Transitions discusses continuity of care and provides Exhibit 2-Care Team Organization (pages 20 and again 70 of the application). Other quality topics are discussed under the following major headings (pages 70-81 of the application):

- Extended Care Team
- End-of-Life Doulas
- Grief and Bereavement Support
- Medical Equipment and Supplies
- Volunteer Services
  - Companionship
  - Family Support
  - Internships
  - Animal Assisted (therapy pets)
  -
- Veterans
  - Veteran Pinning Ceremonies
- Emergency Preparedness

- c. **What resources, including health manpower, management personnel, and funds for capital and operating expenditures, are available for project accomplishment and operation? ss. 408.035(4), Florida Statutes.**

**Applies to all the co-batched projects, with the exception of:**

- **PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)**
- **Transitions Intermediate Holdings, LLC (CON application #10708)**

The purpose of our analysis for this section is to determine if the applicant has access to the funds necessary to fund this and all capital projects. Our review includes an analysis of the short and long-term position of the applicant, parent, or other related parties who will fund the project. The analysis of the short and long-term position is intended to provide some level of objective assurance on the likelihood that funding will be available. The stronger the short-term position, the more likely cash on hand or cash flows could be used to fund the project. The stronger the long-term position, the more likely that debt financing could be achieved, if necessary, to fund the project. We also calculate working capital (current assets less current liabilities) a measure of excess liquidity that could be used to fund capital projects.

Historically we have compared all applicant financial ratios regardless of type to benchmarks established from financial ratios collected from Florida acute care hospitals. While not always a perfect match to a particular CON project it is a reasonable proxy for health care related entities.

Below is an analysis of the audited financial statements for the applicants, where the short-term and long-term measures fall on the scale (highlighted in gray) for the most recent year.

**Affinity Care of Palm Beach LLC (CON application #10698):**

<b>10698 - Affinity Care of Palm Beach, LLC</b>	
	<b>Sep-21</b>
Current Assets	\$500,000
Total Assets	\$500,000
Current Liabilities	\$0
Total Liabilities	\$0
Net Assets	<b>\$500,000</b>
Total Revenues	\$0
Excess of Revenues Over Expenses	\$0
Cash Flow from Operations	\$0
<b>Short-Term Analysis</b>	
Current Ratio (CA/CL)	N/A
Cash Flow to Current Liabilities (CFO/CL)	N/A
<b>Long-Term Analysis</b>	
Long-Term Debt to Net Assets (TL-CL/NA)	0.0%
Total Margin (ER/TR)	N/A
<b>Measure of Available Funding</b>	
Working Capital	<b>\$500,000</b>

<b>Position</b>	<b>Strong</b>	<b>Good</b>	<b>Adequate</b>	<b>Moderately Weak</b>	<b>Weak</b>
Current Ratio	above 3	3 - 2.3	2.3 - 1.7	1.7 - 1.0	< 1.0
Cash Flow to Current Liabilities	>150%	150%-100%	100% - 50%	50% - 0%	< 0%
Debt to Equity	0% - 10%	10%-35%	35%-65%	65%-95%	> 95% or < 0%
Total Margin	> 12%	12% - 8.5%	8.5% - 5.5%	5.5% - 0%	< 0%

**Capital Requirements and Funding:**

On Schedule 2, the applicant indicates capital projects totaling \$448,200, which includes the CON currently under review, and other capital expenditures. The applicant indicates on Schedule 3 of its application that funding for the project will be by cash on hand. With \$500,000 in cash on hand and an available 17 million from the Stern Family trust, the applicant has sufficient resources to fund this project and all capital expenditures.

**Conclusion:**

Funding for this project and the entire capital budget should be available as needed.

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**Brevard HMA Hospice, LLC (CON application #10699):**

<b>10699 - LHC Group, Inc. &amp; Subs</b>		
	<b>Dec-20</b>	<b>Dec-19</b>
Current Assets	\$647,022,000	\$380,274,000
Total Assets	\$2,483,354,000	\$2,140,295,000
Current Liabilities	\$681,436,000	\$230,972,000
Total Liabilities	\$870,000,000	\$633,044,000
Net Assets	\$1,613,354,000	\$1,507,251,000
Total Revenues	\$2,063,204,000	\$2,080,241,000
Excess of Revenues Over Expenses	\$178,105,000	\$151,614,000
Cash Flow from Operations	\$529,247,000	\$130,462,000
<b>Short-Term Analysis</b>		
Current Ratio (CA/CL)	N/A	N/A
Cash Flow to Current Liabilities (CFO/CL)	N/A	N/A
<b>Long-Term Analysis</b>		
Long-Term Debt to Net Assets (TL-CL/NA)	11.7%	26.7%
Total Margin (ER/TR)	N/A	N/A
<b>Measure of Available Funding</b>		
Working Capital	(\$34,414,000)	\$149,302,000

<b>Position</b>	<b>Strong</b>	<b>Good</b>	<b>Adequate</b>	<b>Moderately Weak</b>	<b>Weak</b>
Current Ratio	above 3	3 - 2.3	2.3 - 1.7	1.7 - 1.0	< 1.0
Cash Flow to Current Liabilities	>150%	150%-100%	100% - 50%	50% - 0%	< 0%
Debt to Equity	0% - 10%	10%-35%	35%-65%	65%-95%	> 95% or < 0%
Total Margin	> 12%	12% - 8.5%	8.5% - 5.5%	5.5% - 0%	< 0%

**Capital Requirements and Funding:**

On Schedule 2, the applicant indicates capital projects totaling \$13,969,742.95, which includes the CON currently under review, six other CONs, and other capital expenditures. The applicant indicates on Schedule 3 of its application that funding for the project will be by related company financing. With \$286 million in cash, the parent has sufficient resources to fund this project and all capital expenditures.

**Conclusion:**

Funding for this project and the entire capital budget should be available as needed.

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**Catholic Hospice, Inc. (CON application #10700):**

<b>10700 - Catholic Hospice, Inc. &amp; Subs</b>		
	<b>Sep-20</b>	<b>Sep-19</b>
Current Assets	\$31,071,680	\$24,361,784
Total Assets	\$31,928,383	\$25,011,041
Current Liabilities	\$6,749,861	\$5,052,256
Total Liabilities	\$6,749,861	\$5,052,256
Net Assets	\$25,178,522	\$19,958,785
Total Revenues	\$56,383,367	\$45,627,279
Excess of Revenues Over Expenses	\$4,594,650	(\$1,680,432)
Cash Flow from Operations	\$7,008,306	(\$3,113,894)
<b>Short-Term Analysis</b>		
Current Ratio (CA/CL)	4.6	4.8
Cash Flow to Current Liabilities (CFO/CL)	103.83%	-61.63%
<b>Long-Term Analysis</b>		
Long-Term Debt to Net Assets (TL-CL/NA)	0.0%	0.0%
Total Margin (ER/TR)	8.15%	-3.68%
<b>Measure of Available Funding</b>		
Working Capital	\$24,321,819	\$19,309,528

<b>Position</b>	<b>Strong</b>	<b>Good</b>	<b>Adequate</b>	<b>Moderately Weak</b>	<b>Weak</b>
Current Ratio	above 3	3 - 2.3	2.3 - 1.7	1.7 - 1.0	< 1.0
Cash Flow to Current Liabilities	>150%	150%-100%	100% - 50%	50% - 0%	< 0%
Debt to Equity	0% - 10%	10%-35%	35%-65%	65%-95%	> 95% or < 0%
Total Margin	> 12%	12% - 8.5%	8.5% - 5.5%	5.5% - 0%	< 0%

**Capital Requirements and Funding:**

On Schedule 2, the applicant indicates capital projects totaling \$24,960,410, which includes the CON currently under review, two other CONs, and other capital expenditures. The applicant indicates on Schedule 3 of its application that funding for the project will be by cash on hand. With \$26.0 million in cash and cash equivalents, the applicant has sufficient resources to fund this project and all capital expenditures.

**Conclusion:**

Funding for this project and the entire capital budget should be available as needed.



**Florida Hospice, LLC (CON application #10701):**

<b>10701 - Graham Holdings Company</b>		
	<b>Dec-20</b>	<b>Dec-19</b>
Current Assets	\$1,774,192,000	\$1,663,485,000
Total Assets	\$6,444,119,000	\$5,931,236,000
Current Liabilities	\$949,646,000	\$1,041,871,000
Total Liabilities	\$2,677,726,000	\$2,604,440,000
Net Assets	<b>\$3,766,393,000</b>	<b>\$3,326,796,000</b>
Total Revenues	\$2,889,121,000	\$2,932,099,000
Excess of Revenues Over Expenses	\$100,407,000	\$144,546,000
Cash Flow from Operations	\$210,663,000	\$165,164,000
<b>Short-Term Analysis</b>		
Current Ratio (CA/CL)	1.9	1.6
Cash Flow to Current Liabilities (CFO/CL)	22.18%	15.85%
<b>Long-Term Analysis</b>		
Long-Term Debt to Net Assets (TL-CL/NA)	45.9%	47.0%
Total Margin (ER/TR)	3.48%	4.93%
<b>Measure of Available Funding</b>		
Working Capital	<b>\$824,546,000</b>	<b>\$621,614,000</b>

<b>Position</b>	<b>Strong</b>	<b>Good</b>	<b>Adequate</b>	<b>Moderately Weak</b>	<b>Weak</b>
Current Ratio	above 3	3 - 2.3	2.3 - 1.7	1.7 - 1.0	< 1.0
Cash Flow to Current Liabilities	>150%	150%-100%	100% - 50%	50% - 0%	< 0%
Debt to Equity	0% - 10%	10%-35%	35%-65%	65%-95%	> 95% or < 0%
Total Margin	> 12%	12% - 8.5%	8.5% - 5.5%	5.5% - 0%	< 0%

**Capital Requirements and Funding:**

On Schedule 2, the applicant indicates capital projects totaling \$1,489,227, which includes the CON currently under review, and two other CONs. The applicant indicates on Schedule 3 of its application that funding for the project will be by non-related company financing. With \$414 million in cash and cash equivalents, the investor has sufficient resources to fund this project and all capital expenditures.

**Conclusion:**

Funding for this project and the entire capital budget should be available as needed.

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**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702):**

<b>10702 - MorseLife Obligated Group</b>		
	<b>May-21</b>	<b>May-20</b>
Current Assets	\$67,395,152	\$52,672,547
Total Assets	\$279,329,058	\$265,597,429
Current Liabilities	\$31,662,569	\$23,483,604
Total Liabilities	\$216,022,111	\$223,818,030
Net Assets	\$63,306,947	\$41,779,399
Total Revenues	\$149,355,425	\$140,942,809
Excess of Revenues Over Expenses	\$878,848	(\$968,771)
Cash Flow from Operations	\$10,560,026	\$13,439,956
<b>Short-Term Analysis</b>		
Current Ratio (CA/CL)	2.1	2.2
Cash Flow to Current Liabilities (CFO/CL)	33.35%	57.23%
<b>Long-Term Analysis</b>		
Long-Term Debt to Net Assets (TL-CL/NA)	291.2%	479.5%
Total Margin (ER/TR)	0.59%	-0.69%
<b>Measure of Available Funding</b>		
Working Capital	\$35,732,583	\$29,188,943

<b>Position</b>	<b>Strong</b>	<b>Good</b>	<b>Adequate</b>	<b>Moderately Weak</b>	<b>Weak</b>
Current Ratio	above 3	3 - 2.3	2.3 - 1.7	1.7 - 1.0	< 1.0
Cash Flow to Current Liabilities	>150%	150%-100%	100% - 50%	50% - 0%	< 0%
Debt to Equity	0% - 10%	10%-35%	35%-65%	65%-95%	> 95% or < 0%
Total Margin	> 12%	12% - 8.5%	8.5% - 5.5%	5.5% - 0%	< 0%

**Capital Requirements and Funding:**

On Schedule 2, the applicant indicates capital projects totaling \$3,670,900, which includes the CON currently under review, and other capital expenditures. The applicant indicates on Schedule 3 of its application that funding for the project will be by related company financing. With \$7.5 million in cash and cash equivalents, the parent has sufficient resources to fund this project and all capital expenditures.

**Conclusion:**

Funding for this project and the entire capital budget should be available as needed.

**CON Action Numbers: 10698 through 10708**

**Odyssey Healthcare of Marion County, LLC (CON application #10703):**

<b>10703 - Kindred at Home</b>		
	<b>Dec-20</b>	<b>Dec-19</b>
Current Assets	\$843,437,000	\$561,465,000
Total Assets	\$5,696,604,000	\$5,519,407,000
Current Liabilities	\$553,090,000	\$403,870,000
Total Liabilities	\$2,997,959,000	\$3,040,510,000
Net Assets	\$2,698,645,000	\$2,478,897,000
Total Revenues	\$2,965,400,000	\$3,100,296,000
Excess of Revenues Over Expenses	\$422,872,000	\$265,813,000
Cash Flow from Operations	\$515,460,000	\$168,384,000
<b>Short-Term Analysis</b>		
Current Ratio (CA/CL)	1.5	1.4
Cash Flow to Current Liabilities (CFO/CL)	93.20%	41.69%
<b>Long-Term Analysis</b>		
Long-Term Debt to Net Assets (TL-CL/NA)	90.6%	106.4%
Total Margin (ER/TR)	14.26%	8.57%
<b>Measure of Available Funding</b>		
Working Capital	\$290,347,000	\$157,595,000

<b>Position</b>	<b>Strong</b>	<b>Good</b>	<b>Adequate</b>	<b>Moderately Weak</b>	<b>Weak</b>
Current Ratio	above 3	3 - 2.3	2.3 - 1.7	1.7 - 1.0	< 1.0
Cash Flow to Current Liabilities	>150%	150%-100%	100% - 50%	50% - 0%	< 0%
Debt to Equity	0% - 10%	10%-35%	35%-65%	65%-95%	> 95% or < 0%
Total Margin	> 12%	12% - 8.5%	8.5% - 5.5%	5.5% - 0%	< 0%

**Capital Requirements and Funding:**

On Schedule 2, the applicant indicates capital projects totaling \$2,002,695, which includes the CON currently under review, another CON, and other capital expenditures. The applicant indicates on Schedule 3 of its application that funding for the project will be by related company financing. With \$379 million in cash and cash equivalents, the parent has sufficient resources to fund this project and all capital expenditures.

**CON Action Numbers: 10698 through 10708**

**Conclusion:**

Funding for this project and the entire capital budget should be available as needed.

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704):**

<b>10704 - ProMedica Health System &amp; Subs</b>		
	<b>Dec-20</b>	<b>Dec-19</b>
Current Assets	\$2,045,682,000	\$1,493,974,000
Total Assets	\$9,253,040,000	\$8,495,356,000
Current Liabilities	\$2,193,965,000	\$1,606,976,000
Total Liabilities	\$6,537,305,000	\$5,901,375,000
Net Assets	<b>\$2,715,735,000</b>	<b>\$2,593,981,000</b>
Total Revenues	\$6,861,265,000	\$6,858,085,000
Excess of Revenues Over Expenses	\$51,218,000	\$2,116,000
Cash Flow from Operations	\$841,667,000	\$121,635,000
<b>Short-Term Analysis</b>		
Current Ratio (CA/CL)	0.9	0.9
Cash Flow to Current Liabilities (CFO/CL)	38.36%	7.57%
<b>Long-Term Analysis</b>		
Long-Term Debt to Net Assets (TL-CL/NA)	159.9%	165.6%
Total Margin (ER/TR)	0.75%	0.03%
<b>Measure of Available Funding</b>		
Working Capital	(\$148,283,000)	(\$113,002,000)

<b>Position</b>	<b>Strong</b>	<b>Good</b>	<b>Adequate</b>	<b>Moderately Weak</b>	<b>Weak</b>
Current Ratio	above 3	3 - 2.3	2.3 - 1.7	1.7 - 1.0	< 1.0
Cash Flow to Current Liabilities	>150%	150%-100%	100% - 50%	50% - 0%	< 0%
Debt to Equity	0% - 10%	10%-35%	35%-65%	65%-95%	> 95% or < 0%
Total Margin	> 12%	12% - 8.5%	8.5% - 5.5%	5.5% - 0%	< 0%

**Capital Requirements and Funding:**

On Schedule 2, the applicant indicates capital projects totaling \$348,325, which includes the CON currently under review. The applicant indicates on Schedule 3 of its application that funding for the project will be by related company financing. With \$944 million in cash and cash equivalents, the parent has sufficient resources to fund this project and all capital expenditures.

**CON Action Numbers: 10698 through 10708**

**Conclusion:**

Funding for this project and the entire capital budget should be available as needed.

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705):** The applicant provided a development stage audit showing 0 assets, 0 liabilities and 0 revenues and expenses. The applicant submitted a letter stating that the ultimate parent, United Health Services, would be supplying the funding. The parent submitted a bank printout showing an available cash balance of \$6,293,187.55.

**Capital Requirements and Funding:**

The applicant failed to complete Schedule 2. Schedule 1 shows the total project cost to be \$270,320. On Schedule 3, the applicant indicates related company financing of \$270,320. With \$6.3 million in cash on hand, the parent has sufficient resources to fund this project and all capital expenditures.

**Conclusion:**

Funding for this project and the entire capital budget should be available as needed.

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706):**

<b>10706 - Horizon Acquisition Co., Inc. &amp; Subs</b>		
	<b>Dec-20</b>	<b>Dec-19</b>
Current Assets	\$315,401,000	\$131,526,000
Total Assets	\$2,304,843,000	\$1,132,090,000
Current Liabilities	\$206,044,000	\$101,194,000
Total Liabilities	\$1,436,979,000	\$647,102,000
Net Assets	<b>\$867,864,000</b>	<b>\$484,988,000</b>
Total Revenues	\$949,710,000	\$885,524,000
Excess of Revenues Over Expenses	\$46,692,000	<b>(\$22,221,000)</b>
Cash Flow from Operations	\$15,554,000	<b>(\$17,116,000)</b>
<b>Short-Term Analysis</b>		
Current Ratio (CA/CL)	1.5	1.3
Cash Flow to Current Liabilities (CFO/CL)	7.55%	-16.91%
<b>Long-Term Analysis</b>		
Long-Term Debt to Net Assets (TL-CL/NA)	141.8%	112.6%
Total Margin (ER/TR)	4.92%	-2.51%
<b>Measure of Available Funding</b>		
Working Capital	<b>\$109,357,000</b>	<b>\$30,332,000</b>

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<b>Position</b>	<b>Strong</b>	<b>Good</b>	<b>Adequate</b>	<b>Moderately Weak</b>	<b>Weak</b>
Current Ratio	above 3	3 - 2.3	2.3 - 1.7	1.7 - 1.0	< 1.0
Cash Flow to Current Liabilities	>150%	150%-100%	100% - 50%	50% - 0%	< 0%
Debt to Equity	0% - 10%	10%-35%	35%-65%	65%-95%	> 95% or < 0%
Total Margin	> 12%	12% - 8.5%	8.5% - 5.5%	5.5% - 0%	< 0%

**Capital Requirements and Funding:**

On Schedule 2, the applicant indicates capital projects totaling \$853,781, which includes the CON currently under review. The applicant indicates on Schedule 3 of its application that funding for the project will be by cash on hand. With \$56.3 million in cash and cash equivalents, the applicant has sufficient resources to fund this project and all capital expenditures.

**Conclusion:**

Funding for this project and the entire capital budget should be available as needed.

**Suncrest Hospice Florida, LLC (CON application #10707):**

<b>10707 - Suncrest Health Services, LLC</b>	
	<b>Dec-20</b>
Current Assets	\$32,346,926
Total Assets	\$32,599,603
Current Liabilities	\$8,498,096
Total Liabilities	\$16,775,478
Net Assets	<b>\$15,824,125</b>
Total Revenues	\$87,086,782
Excess of Revenues Over Expenses	\$14,837,393
Cash Flow from Operations	\$10,997,981
<b>Short-Term Analysis</b>	
Current Ratio (CA/CL)	<b>3.8</b>
Cash Flow to Current Liabilities (CFO/CL)	<b>129.42%</b>
<b>Long-Term Analysis</b>	
Long-Term Debt to Net Assets (TL-CL/NA)	<b>52.3%</b>
Total Margin (ER/TR)	<b>17.04%</b>
<b>Measure of Available Funding</b>	
Working Capital	<b>\$23,848,830</b>

**CON Action Numbers: 10698 through 10708**

<b>Position</b>	<b>Strong</b>	<b>Good</b>	<b>Adequate</b>	<b>Moderately Weak</b>	<b>Weak</b>
Current Ratio	above 3	3 - 2.3	2.3 - 1.7	1.7 - 1.0	< 1.0
Cash Flow to Current Liabilities	>150%	150%-100%	100% - 50%	50% - 0%	< 0%
Debt to Equity	0% - 10%	10%-35%	35%-65%	65%-95%	> 95% or < 0%
Total Margin	> 12%	12% - 8.5%	8.5% - 5.5%	5.5% - 0%	< 0%

**Capital Requirements and Funding:**

On Schedules 1 and 2, the applicant indicates capital projects totaling \$908,500, which includes the CON currently under review, and other capital expenditures. The applicant indicates on Schedule 3 of its application that funding for the project will be by cash on hand but for only \$759,250 which is \$149,250 less than the total capital projects. However, with \$17.9 million in cash on hand, the applicant has sufficient resources to fund this project and all capital expenditures.

**Conclusion:**

Funding for this project and the entire capital budget should be available as needed.

**Transitions Intermediate Holdings, LLC (CON application #10708):**

The purpose of our analysis for this section is to determine if the applicant has access to the funds necessary to fund this and all capital projects.

**Capital Requirements and Funding:**

On Schedule 2, the applicant indicates capital projects totaling \$688,701, which includes the CON currently under review. The applicant indicates on Schedule 3 of its application that funding for the project will be by cash on hand. The applicant did not submit audited financial statements as required. The applicant instead submitted an internal statement showing their financial position. However, since the statement is not part of audited financial statements they cannot be relied upon as proof of funds.

**Conclusion:**

Funding for this project and the entire capital budget is in question.

**d. What is the immediate and long-term financial feasibility of the proposal? ss. 408.035 (6), Florida Statutes**

**Applies to all applicants** - The immediate and long-term financial feasibility of the project is tied to expected profitability. Profitability for hospice is driven by two factors, volume of patients and length of stay/condition of the patient. A new hospice program in a service area with published need is more likely than not to be financially feasible since patient volume and mix is presumed to be available in sufficient amounts to sustain a new program. The focus of our review will be on the reasonableness of projections, specifically the revenue.

The vast majority of hospice days are paid by Medicare (Medicaid is the next largest payer with similar reimbursement rates). As such, revenue is predictable by day and service type. Schedule 7 includes revenue by service type. We have divided the applicant's projected revenues by the estimated Medicare reimbursement rates for each level of service in year two to estimate the total patient days that would be generated by that level of revenue. The results were then compared to the applicant's estimated number of patient days. Calculated patient days that approximate the applicant's projected patient days are considered reasonable and support the applicant's assumptions of feasibility. Calculated patient days that vary widely from the applicant's projected patient days call into question the applicant's profitability assumptions and feasibility. The results of the calculations are summarized below.



**CON Action Numbers: 10698 through 10708**

**Affinity Care of Palm Beach LLC (CON application #10698):**

CON 10698	Affinity Care of Palm Beach, LLC				
Palm Beach	Wage Component	Wage Index	Adjusted Wage Amount	Unadjusted Component	Payment Rate
Base Rate Calculation					
Routine Home Care 1-60 days	\$131.61	0.8996	\$118.40	\$67.70	\$186.10
Routine Home Care 61+ days	\$104.00	0.8996	\$93.56	\$53.58	\$147.14
Continuous Home Care	\$1,078.25	0.8996	\$969.99	\$355.59	\$1,325.58
Inpatient Respite	\$283.32	0.8996	\$254.87	\$181.14	\$436.01
General Inpatient	\$665.05	0.8996	\$598.28	\$382.28	\$980.56
Year Two Comparison	Inflation Factor Year Two	Inflation Adjusted Payment Rate	Schedule 7 Revenue Year 2	Continuous Service Hours Provided	Calculated Patient Days
Routine Home Care 1-60 days	1.088	\$202.54	\$3,257,026		16,081
Routine Home Care 61+ days	1.088	\$160.14	\$3,257,026		20,339
Continuous Home Care	1.088	\$1,442.69	\$59,346	10	17
Inpatient Respite	1.088	\$474.54	\$62,593		132
General Inpatient	1.088	\$1,067.19	\$140,468		132
		<b>Total</b>	<b>\$6,776,458</b>		<b>36,701</b>
				Days from Schedule 7	34,188
				<b>Difference</b>	<b>-2,513</b>
				<b>Percentage Difference</b>	<b>-7.35%</b>

As such, the applicant’s projected patient days are 7.35 percent or 2,513 days less than the number of patient days calculated by staff. Operating profits from this project are expected to increase from a net loss of \$627,302 in year one to a net profit of \$280,810 in year two.

**Conclusion:**

This project appears to be financially feasible, although patient days, and thus revenue, may be understated.

**CON Action Numbers: 10698 through 10708**

**Brevard HMA Hospice, LLC (CON application #10699):**

CON 10699	Brevard HMA Hospice, LLC				
Palm Beach	Wage Component	Wage Index	Adjusted Wage Amount	Unadjusted Component	Payment Rate
Base Rate Calculation					
Routine Home Care 1-60 days	\$131.61	0.8996	\$118.40	\$67.70	\$186.10
Routine Home Care 61+ days	\$104.00	0.8996	\$93.56	\$53.58	\$147.14
Continuous Home Care	\$1,078.25	0.8996	\$969.99	\$355.59	\$1,325.58
Inpatient Respite	\$283.32	0.8996	\$254.87	\$181.14	\$436.01
General Inpatient	\$665.05	0.8996	\$598.28	\$382.28	\$980.56
Year Two Comparison	Inflation Factor Year Two	Inflation Adjusted Payment Rate	Schedule 7 Revenue Year 2	Continuous Service Hours Provided	Calculated Patient Days
Routine Home Care 1-60 days	1.042	\$193.89	\$1,695,827		8,746
Routine Home Care 61+ days	1.042	\$153.30	\$2,727,057		17,789
Continuous Home Care	1.042	\$1,381.11	\$0	24	0
Inpatient Respite	1.042	\$454.28	\$123,412		272
General Inpatient	1.042	\$1,021.64	\$832,158		815
		<b>Total</b>	<b>\$5,378,454</b>		<b>27,621</b>
			Days from Schedule 7		27,190
			<b>Difference</b>		<b>-431</b>
			<b>Percentage Difference</b>		<b>-1.59%</b>

As such, the applicant’s projected patient days are 1.59 percent or 431 days less than the number of patient days calculated by staff.

Operating profits from this project are expected to increase from a net profit of \$29,071.26 in year one to a net profit of \$861,028.80 in year two.

**Conclusion:**

This project appears to be financially feasible, although patient days may be slightly understated and/or revenues slightly overstated.

**CON Action Numbers: 10698 through 10708**

**Catholic Hospice, Inc. (CON application #10700):**

CON 10700	Catholic Hospice, Inc.				
Palm Beach	Wage Component	Wage Index	Adjusted Wage Amount	Unadjusted Component	Payment Rate
Base Rate Calculation					
Routine Home Care 1-60 days	\$131.61	0.8996	\$118.40	\$67.80	\$186.20
Routine Home Care 61+ days	\$104.00	0.8996	\$93.56	\$53.58	\$147.14
Continuous Home Care	\$1,078.25	0.8996	\$969.99	\$355.59	\$1,325.58
Inpatient Respite	\$283.32	0.8996	\$254.87	\$181.14	\$436.01
General Inpatient	\$665.05	0.8996	\$598.28	\$382.28	\$980.56
Year Two Comparison	Inflation Factor Year Two	Inflation Adjusted Payment Rate	Schedule 7 Revenue Year 2	Continuous Service Hours Provided	Calculated Patient Days
Routine Home Care 1-60 days	1.086	\$202.16	\$2,954,221		14,613
Routine Home Care 61+ days	1.086	\$159.75	\$8,182,425		51,219
Continuous Home Care	1.086	\$1,439.24	\$2,261,898	24	1,572
Inpatient Respite	1.086	\$473.40	\$83,220		176
General Inpatient	1.086	\$1,064.63	\$1,776,461		1,669
<b>Total</b>			<b>\$15,258,225</b>		<b>69,248</b>
			Days from Schedule 7		64,260
			<b>Difference</b>		<b>-4,988</b>
			<b>Percentage Difference</b>		<b>-7.76%</b>

As such, the applicant’s projected patient days are 7.76 percent or 4,988 days less than the number of patient days calculated by staff. Operating profits from this project are expected to increase from a net loss of \$465,374 in year one to a net profit of \$614,898 in year two.

**Conclusion:**

This project appears to be financially feasible, although patient days, and thus revenue, may be understated.

**CON Action Numbers: 10698 through 10708**

**Florida Hospice, LLC (CON application #10701)**

CON 10701	Florida Hospice, LLC				
Palm Beach	Wage Component	Wage Index	Adjusted Wage Amount	Unadjusted Component	Payment Rate
Base Rate Calculation					
Routine Home Care 1-60 days	\$131.61	0.8996	\$118.40	\$67.70	\$186.10
Routine Home Care 61+ days	\$104.00	0.8996	\$93.56	\$53.58	\$147.14
Continuous Home Care	\$1,078.25	0.8996	\$969.99	\$355.59	\$1,325.58
Inpatient Respite	\$283.32	0.8996	\$254.87	\$181.14	\$436.01
General Inpatient	\$665.05	0.8996	\$598.28	\$382.28	\$980.56
<b>Year Two Comparison</b>					
	Inflation Factor Year Two	Inflation Adjusted Payment Rate	Schedule 7 Revenue Year 2	Continuous Service Hours Provided	Calculated Patient Days
Routine Home Care 1-60 days	1.042	\$193.89	\$2,628,884		13,558
Routine Home Care 61+ days	1.042	\$153.30	\$2,802,714		18,282
Continuous Home Care	1.042	\$1,381.11	\$363,409	24	263
Inpatient Respite	1.042	\$454.28	\$52,886		116
General Inpatient	1.042	\$1,021.64	\$312,403		306
<b>Total</b>			<b>\$6,160,296</b>		<b>32,526</b>
			Days from Schedule 7		31,879
			<b>Difference</b>		<b>-647</b>
			<b>Percentage Difference</b>		<b>-2.03%</b>

As such, the applicant’s projected patient days are 2.03 percent or 647 days less than the number of patient days calculated by staff. Operating profits from this project are expected to increase from a net loss of \$99,854 in year one to a net profit of \$1,587,885 in year two.

**Conclusion:**

This project appears to be financially feasible, although patient days may be slightly understated and/or revenues slightly overstated.

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**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702):**

CON 10702	MorseLife Hospice Institute, Inc.				
Palm Beach	Wage Component	Wage Index	Adjusted Wage Amount	Unadjusted Component	Payment Rate
Base Rate Calculation					
Routine Home Care 1-60 days	\$131.61	0.8996	\$118.40	\$67.80	\$186.20
Routine Home Care 61+ days	\$104.00	0.8996	\$93.56	\$53.58	\$147.14
Continuous Home Care	\$1,078.25	0.8996	\$969.99	\$355.59	\$1,325.58
Inpatient Respite	\$283.32	0.8996	\$254.87	\$181.14	\$436.01
General Inpatient	\$665.05	0.8996	\$598.28	\$382.28	\$980.56
<b>Year Two Comparison</b>					
	Inflation Factor Year Two	Inflation Adjusted Payment Rate	Schedule 7 Revenue Year 2	Continuous Service Hours Provided	Calculated Patient Days
Routine Home Care 1-60 days	1.086	\$202.16	\$2,327,500		11,513
Routine Home Care 61+ days	1.086	\$159.75	\$3,016,800		18,884
Continuous Home Care	1.086	\$1,439.24	\$363,400	24	252
Inpatient Respite	1.086	\$473.40	\$4,800		10
General Inpatient	1.086	\$1,064.63	\$67,700		64
<b>Total</b>			<b>\$5,780,200</b>		<b>30,723</b>
			Days from Schedule 7		29,463
			<b>Difference</b>		<b>-1,260</b>
			<b>Percentage Difference</b>		<b>-4.28%</b>

As such, the applicant's projected patient days are 4.28 percent or 1,260 days less than the number of patient days calculated by staff.

Operating profits from this project are expected to increase from a net loss of \$22,900 in year one to a net profit of \$754,000 in year two.

**Conclusion:**

This project appears to be financially feasible, although patient days, and thus revenue, may be understated.

**CON Action Numbers: 10698 through 10708**

**Odyssey Healthcare of Marion County, LLC (CON application #10703):**

CON 10703	Odyssey Healthcare of Marion County, LLC				
Palm Beach	Wage Component	Wage Index	Adjusted Wage Amount	Unadjusted Component	Payment Rate
Base Rate Calculation					
Routine Home Care 1-60 days	\$131.61	0.8996	\$118.40	\$67.70	\$186.10
Routine Home Care 61+ days	\$104.00	0.8996	\$93.56	\$53.58	\$147.14
Continuous Home Care	\$1,078.25	0.8996	\$969.99	\$355.59	\$1,325.58
Inpatient Respite	\$283.32	0.8996	\$254.87	\$181.14	\$436.01
General Inpatient	\$665.05	0.8996	\$598.28	\$382.28	\$980.56
Year Two Comparison	Inflation Factor Year Two	Inflation Adjusted Payment Rate	Schedule 7 Revenue Year 2	Continuous Service Hours Provided	Calculated Patient Days
Routine Home Care 1-60 days	1.057	\$196.66	\$1,476,248		7,506
Routine Home Care 61+ days	1.057	\$155.49	\$4,053,308		26,067
Continuous Home Care	1.057	\$1,400.85	\$207,496	15.4	95
Inpatient Respite	1.057	\$460.77	\$25,145		55
General Inpatient	1.057	\$1,036.24	\$98,960		95
			<b>Total</b>		<b>33,819</b>
			Days from Schedule 7		34,556
			<b>Difference</b>		<b>737</b>
			<b>Percentage Difference</b>		<b>2.13%</b>

As such, the applicant's projected patient days are 2.13 percent or 737 days more than the number of patient days calculated by staff. Operating profits from this project are expected to increase from a net profit of \$230,048 in year one to a net profit of \$1,240,976 in year two.

**Conclusion:**

This project appears to be financially feasible, although patient days may be slightly overstated and/or revenues slightly understated.

**CON Action Numbers: 10698 through 10708**

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704):**

CON 10704	ProMedica Hospice of Palm Beach County FL, LLC				
Palm Beach	Wage Component	Wage Index	Adjusted Wage Amount	Unadjusted Component	Payment Rate
Base Rate Calculation					
Routine Home Care 1-60 days	\$131.61	0.8996	\$118.40	\$67.70	\$186.10
Routine Home Care 61+ days	\$104.00	0.8996	\$93.56	\$53.58	\$147.14
Continuous Home Care	\$1,078.25	0.8996	\$969.99	\$355.59	\$1,325.58
Inpatient Respite	\$283.32	0.8996	\$254.87	\$181.14	\$436.01
General Inpatient	\$665.05	0.8996	\$598.28	\$382.28	\$980.56
Year Two Comparison	Inflation Factor Year Two	Inflation Adjusted Payment Rate	Schedule 7 Revenue Year 2	Continuous Service Hours Provided	Calculated Patient Days
Routine Home Care 1-60 days	1.057	\$196.66	\$1,236,994		6,290
Routine Home Care 61+ days	1.057	\$155.49	\$3,054,637		19,645
Continuous Home Care	1.057	\$1,400.85	\$13,769	24	10
Inpatient Respite	1.057	\$460.77	\$29,438		64
General Inpatient	1.057	\$1,036.24	\$331,013		319
			<b>Total</b>		<b>26,328</b>
			Days from Schedule 7		27,029
			<b>Difference</b>		<b>701</b>
			<b>Percentage Difference</b>		<b>2.59%</b>

As such, the applicant's projected patient days are 2.59 percent or 701 days more than the number of patient days calculated by staff. Operating profits from this project are expected to increase from a net loss of \$215,760 in year one to a net profit of \$677,673 in year two.

**Conclusion:**

This project appears to be financially feasible, although patient days may be slightly overstated and/or revenues slightly understated.

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**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705):**

CON 10705	PruittHealth Hospice - Southeast Florida, LLC				
Palm Beach	Wage Component	Wage Index	Adjusted Wage Amount	Unadjusted Component	Payment Rate
Base Rate Calculation					
Routine Home Care 1-60 days	\$131.61	0.8996	\$118.40	\$67.80	\$186.20
Routine Home Care 61+ days	\$104.00	0.8996	\$93.56	\$53.58	\$147.14
Continuous Home Care	\$1,078.25	0.8996	\$969.99	\$355.59	\$1,325.58
Inpatient Respite	\$283.32	0.8996	\$254.87	\$181.14	\$436.01
General Inpatient	\$665.05	0.8996	\$598.28	\$382.28	\$980.56
Year Two Comparison	Inflation Factor Year Two	Inflation Adjusted Payment Rate	Schedule 7 Revenue Year 2	Continuous Service Hours Provided	Calculated Patient Days
Routine Home Care 1-60 days	1.042	\$194.00	\$2,510,799		12,943
Routine Home Care 61+ days	1.042	\$153.30	\$1,351,969		8,819
Continuous Home Care	1.042	\$1,381.11	\$275,791	24	200
Inpatient Respite	1.042	\$454.28	\$30,015		66
General Inpatient	1.042	\$1,021.64	\$471,931		462
<b>Total</b>			<b>\$4,640,505</b>		<b>22,489</b>
			Days from Schedule 7		21,777
			<b>Difference</b>		<b>-712</b>
			<b>Percentage Difference</b>		<b>-3.27%</b>

As such, the applicant’s projected patient days are 3.27 percent or 712 days less than the number of patient days calculated by staff. Operating profits from this project are expected to increase from a net loss of \$308,300 in year one to a net profit of \$455,986 in year two.

**Conclusion:**

This project appears to be financially feasible, although patient days may be slightly understated and/or revenues slightly overstated.



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**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706):**

CON 10706	Seasons Hospice & Palliative Care of Palm Beach County				
Palm Beach	Wage Component	Wage Index	Adjusted Wage Amount	Unadjusted Component	Payment Rate
Base Rate Calculation					
Routine Home Care 1-60 days	\$131.61	0.8996	\$118.40	\$67.80	\$186.20
Routine Home Care 61+ days	\$104.00	0.8996	\$93.56	\$53.58	\$147.14
Continuous Home Care	\$1,078.25	0.8996	\$969.99	\$355.59	\$1,325.58
Inpatient Respite	\$283.32	0.8996	\$254.87	\$181.14	\$436.01
General Inpatient	\$665.05	0.8996	\$598.28	\$382.28	\$980.56
<b>Year Two Comparison</b>					
	Inflation Factor Year Two	Inflation Adjusted Payment Rate	Schedule 7 Revenue Year 2	Continuous Service Hours Provided	Calculated Patient Days
Routine Home Care 1-60 days	1.057	\$196.77	\$1,513,280		7,691
Routine Home Care 61+ days	1.057	\$155.49	\$3,530,987		22,708
Continuous Home Care	1.057	\$1,400.85	\$1,200,333	24	857
Inpatient Respite	1.057	\$460.77	\$23,351		51
General Inpatient	1.057	\$1,036.24	\$518,747		501
		<b>Total</b>	<b>\$6,786,698</b>		<b>31,807</b>
			Days from Schedule 7		26,520
			<b>Difference</b>		<b>-5,287</b>
			<b>Percentage Difference</b>		<b>-19.94%</b>

As such, the applicant’s projected patient days are 19.94 percent or 5,287 days less than the number of patient days calculated by staff. Operating profits from this project are expected to increase from a net loss of \$589,351 in year one to a net profit of \$596,478 in year two.

**Conclusion:**

This project appears to be financially feasible, although patient days may be understated and/or revenues overstated.

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**Suncrest Hospice Florida, LLC (CON application #10707):**

CON 10707	Suncrest Hospice Florida, LLC				
Palm Beach	Wage Component	Wage Index	Adjusted Wage Amount	Unadjusted Component	Payment Rate
Base Rate Calculation					
Routine Home Care 1-60 days	\$131.61	0.8996	\$118.40	\$67.80	\$186.20
Routine Home Care 61+ days	\$104.00	0.8996	\$93.56	\$53.58	\$147.14
Continuous Home Care	\$1,078.25	0.8996	\$969.99	\$355.59	\$1,325.58
Inpatient Respite	\$283.32	0.8996	\$254.87	\$181.14	\$436.01
General Inpatient	\$665.05	0.8996	\$598.28	\$382.28	\$980.56
Year Two Comparison	Inflation Factor Year Two	Inflation Adjusted Payment Rate	Schedule 7 Revenue Year 2	Continuous Service Hours Provided	Calculated Patient Days
Routine Home Care 1-60 days	1.057	\$196.77	\$2,738,413		13,917
Routine Home Care 61+ days	1.057	\$155.49	\$4,810,011		30,934
Continuous Home Care	1.057	\$1,400.85	\$0	24	0
Inpatient Respite	1.057	\$460.77	\$8,725		19
General Inpatient	1.057	\$1,036.24	\$8,725		8
<b>Total</b>			<b>\$7,565,874</b>		<b>44,878</b>
			Days from Schedule 7		47,693
			<b>Difference</b>		<b>2,815</b>
			<b>Percentage Difference</b>		<b>5.90%</b>

As such, the applicant’s projected patient days are 5.90 percent or 2,815 days more than the number of patient days calculated by staff. Operating profits from this project are expected to increase from a net loss of \$927,858 in year one to a net profit of \$548,618 in year two.

**Conclusion:**

This project appears to be financially feasible, although patient days may be overstated and/or revenues understated.

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**Transitions Intermediate Holdings, LLC (CON application #10708):**

CON 10708	Transitions Intermediate Holdings, LLC				
Palm Beach	Wage Component	Wage Index	Adjusted Wage Amount	Unadjusted Component	Payment Rate
Base Rate Calculation					
Routine Home Care 1-60 days	\$131.61	0.8996	\$118.40	\$67.80	\$186.20
Routine Home Care 61+ days	\$104.00	0.8996	\$93.56	\$53.58	\$147.14
Continuous Home Care	\$1,078.25	0.8996	\$969.99	\$355.59	\$1,325.58
Inpatient Respite	\$283.32	0.8996	\$254.87	\$181.14	\$436.01
General Inpatient	\$665.05	0.8996	\$598.28	\$382.28	\$980.56
<b>Year Two Comparison</b>					
	Inflation Factor Year Two	Inflation Adjusted Payment Rate	Schedule 7 Revenue Year 2	Continuous Service Hours Provided	Calculated Patient Days
Routine Home Care 1-60 days	1.037	\$193.07	\$2,216,671		11,481
Routine Home Care 61+ days	1.037	\$152.57	\$4,082,341		26,757
Continuous Home Care	1.037	\$1,374.53	\$561,558	24	409
Inpatient Respite	1.037	\$452.12	\$84,273		186
General Inpatient	1.037	\$1,016.77	\$382,224		376
<b>Total</b>			<b>\$7,327,067</b>		<b>39,209</b>
			Days from Schedule 7		39,434
			<b>Difference</b>		<b>225</b>
			<b>Percentage Difference</b>		<b>0.57%</b>

As such, the applicant’s projected patient days are 0.57 percent or 225 days more than the number of patient days calculated by staff. Operating profits from this project are expected to increase from a net loss of \$611,286 in year one to a net profit of \$701,711 in year two.

**Conclusion:**

This project appears to be financially feasible, although patient days may be slightly overstated and/or revenues slightly understated.

- e. **Will the proposed project foster competition to promote quality and cost-effectiveness? ss. 408.035(7), Florida Statutes.**

**Applies to all co-batched applicants:** Strictly, from a financial perspective, the type of price-based competition that would result in increased efficiencies, service, and quality is limited in health care in general and in hospice specifically. Cost-effectiveness through competition is typically achieved via a combination of competitive pricing

**CON Action Numbers: 10698 through 10708**

that forces more efficient cost to remain profitable and offering higher quality and additional services to attract patients from competitors. Since Medicare and Medicaid are the primary payers in hospice, price-based competition is almost non-existent. With the revenue stream essentially fixed on a per patient basis, the available margin to increase quality and offer additional services is limited.

**Conclusion:**

Strictly, from a financial perspective, this project will not have a material impact on price-based competition.

- f. Are the proposed costs and methods of construction reasonable? Do they comply with statutory and rule requirements? ss. 408.035 (8), Florida Statutes; Ch. 59A-4, Florida Administrative Code.**

There are no construction costs and methods subject to CON application review for the proposed hospice programs.

- g. Does the applicant have a history of providing health services to Medicaid patients and the medically indigent? Does the applicant propose to provide health services to Medicaid patients and the medically indigent? ss. 408.035(9), Florida Statutes.**

Hospice programs are required by federal and state law to provide hospice patients with inpatient care when needed (42 Code of Federal Regulations 418.108). Hospice care also must be provided regardless of ability to pay and regardless of age, race, religion, sexual orientation, diagnosis, payer source or financial status. Therefore, the Agency will not impose a charity care or Medicaid patient day condition on an applicant.

**Each** co-batched applicant's Medicaid and charity care response is summarized in the table below.

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**Service Area 9C Co-Batched Applicants  
Medicaid and Charity Care  
History & Projections**

<b>CON Applicant/ Application #</b>	<b>Discusses Applicant/Parent History</b>	<b>Year One Medicaid Proposed</b>	<b>Year Two Medicaid Proposed</b>	<b>Year One Charity Care</b>	<b>Year Two Charity Care</b>
Affinity/10698	Yes	4.0%	4.0%	3.5%	3.5%
Brevard HMA/10699	Yes	3.0%	3.0%	1.0%	1.0%
Catholic/10700	Yes	4.0%	4.0%	2.0%	2.0%
Florida Hospice/10701	Yes	2.8	2.8%	0.3%	0.3%
MorseLife/10702					
Total Hospice Program	Yes	3.0%	4.0%	1.0%	1.0%
The Project	Yes	6.0%	6.0%	1.0%	2.0%
Odyssey Marion/10703	Yes	3.1%	3.1%	2.0%	2.0%
ProMedica/10704	Yes	2.1%	2.1%	0.1%	0.1%
PruittHealth/10705	Yes	3.0%	3.0%	3.0%	3.0%
Seasons/10706	Yes	2.0%	2.0%	2.5%	2.5%
Suncrest/10707	Yes	3.0%	3.0%	0.1%	0.1%
Transitions/10708	Yes	2.1%	0.76%	2.05%	0.74%

Source: The applicant's response to item E. 3. g. and/or Schedule 7A for year one and year two.

**F. SUMMARY**

**Each** co-batched applicant is seeking a CON to establish a new hospice program in SA 9C.

**Affinity Care of Palm Beach LLC (CON application #10698)** is a for-profit development stage Florida entity and an affiliate of Continuum Care Hospice and Affinity Health Management. Collectively, the organization has hospice programs in Florida, New Jersey, Ohio, Virginia and Washington.

Affinity affiliates are licensed in two Florida SAs and CON-approved to establish hospice programs in SAs 6A and 11. Affinity also proposes to establish a new SA 6B hospice program in this batch.

Total project cost which includes equipment, project development, and start-up costs is \$388,200.

Pursuant to project approval, Affinity Care of Palm Beach LLC offers a total of 20 Schedule C conditions.

**Brevard HMA Hospice, LLC (CON application #10699)** is a licensed for-profit Florida hospice serving SA 7A and an affiliate of/managed by LHC Group, which has hospice operations in 20 states. Brevard references the proposed project as Mederi Hospice.

**CON Action Numbers: 10698 through 10708**

In this batching cycle, LHC Group also proposes to establish new hospice programs in SAs 1, 3B, 6B, and 9A.

The applicant proposes \$458,472.68 total project costs which include equipment, project development and start-up costs.

Pursuant to project approval, Brevard HMA Hospice, LLC bullets a total of 12 Schedule C conditions.

**Catholic Hospice, Inc. (CON application #10700)**, also referenced as Catholic Hospice, Catholic or the applicant, is a Florida, faith-based, non-profit organization and is an existing provider of hospice services in SAs 10 (since 2008) and 11 (since 1988).

The applicant expects issuance of license and initiation of service in April 2022.

The applicant proposes \$563,429 in total project costs, which include equipment, project development and start-up costs.

Pursuant to project approval, Catholic Hospice offers a total of six Schedule C conditions:

**Florida Hospice, LLC (CON application #10701)** is a development stage, for-profit Florida entity with no operating history and is not CON-approved, nor is its parent company CON-approved, to establish a hospice program in Florida. The applicant is an affiliate of Residential Healthcare Group, Inc., which has hospice programs in Illinois, Michigan and Pennsylvania.

The applicant proposes \$523,551 in total project costs, which includes equipment, project development and start-up costs.

Pursuant to project approval, Florida Hospice, LLC offers a total of 19 Schedule C conditions.

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** is a not-for-profit licensed and operational hospice provider in Palm Beach County, Florida (SA 9C).

Palm Beach Hospice by MorseLife's owner/licensee is MorseLife Hospice Institute, Inc., whose current license reads in part, "Pursuant to 408.036(3)(a), Florida Statutes, services can only be provided to patients residing in the communities located within the not-for-profit retirement community, including home and community-based service providers".

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The applicant proposes \$470,900 in total project costs, which include equipment, project development and start-up costs.

Pursuant to project approval, MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife offers a total of 24 Schedule C conditions.

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** is an existing for-profit Florida entity and is an affiliate of the Kindred at Home Hospice Division, which has hospice programs in SAs 1, 2A, 3B, 4B, 7B and 11.

In this batching cycle, Odyssey Healthcare of Marion County, LLC also proposes to establish new hospice program in SA 6B.

The applicant proposes \$612,378 in total project costs, which include equipment, project development and start-up costs.

Pursuant to project approval, Odyssey Healthcare of Marion County, LLC offers a total of 15 Schedule C conditions.

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704)** is a not-for-profit development stage Florida entity and is a subsidiary of (domestic nonprofit LLC) ProMedica Health Systems and Subsidiaries (the Systems), established in 1986 and located on Toledo, Ohio, which operates in 28 states as well as providing health care consultative services in China.

The Systems, through its Florida affiliates, owns/operates hospice programs serving SAs 4A, 10 and 11.

In this batching cycle, The Systems also proposes to establish a new hospice program in SA 3B.

The applicant proposes \$348,325 in total project costs, which include equipment, project development and start-up costs.

Pursuant to project approval, ProMedica Hospice of Palm Beach County FL LLC offers a total of 21 Schedule C conditions.

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)** is a for-profit development stage Florida entity with no operating history affiliated with PruittHealth, Inc., which operates a total of 25 hospice programs in three states.

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The ultimate parent company is United Health Services, Inc., which is currently not licensed to provide and is not CON-approved to provide a hospice program in Florida.

United's PruittHealth, Inc., also proposes to establish a new hospice program in SAs 1, 3B and 6B.

The applicant proposes \$270,320 in total project costs, which include equipment, project development and start-up costs.

Pursuant to project approval, PruittHealth Hospice – Southeast Florida, LLC offers a total of 22 Schedule C conditions.

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** is a development stage for-profit Florida entity and is directly owned by AccentCare, Inc., which owns all of Seasons Hospice & Palliative Care, Inc.'s hospices. AccentCare, Inc. is ultimately owned by Horizon Acquisition Co. Inc., which is funding the project.

AccentCare/Seasons has licensed hospices in Arizona, California, Colorado, Connecticut, Delaware, Florida, Georgia, Illinois, Indiana, Massachusetts, Maryland, Michigan, Mississippi, Missouri, New Jersey, Nevada, Oregon, Pennsylvania, Tennessee, Texas and Wisconsin.

Seasons affiliates provide hospice services in SAs 5A, 5B, 6A, 10 and 11.

In this batching cycle, Seasons also proposes to establish a new hospice program in SA 6B.

Total project cost is \$853,781 which includes building, equipment, development, and start-up costs.

Pursuant to project approval, Seasons Hospice & Palliative Care of Palm Beach County, LLC offers a total of 35 Schedule C conditions.

**Suncrest Hospice Florida, LLC (CON application #10707)** is a development stage, for-profit Florida entity. The applicant's parent, Suncrest Health operates 14 hospices in 10 states. Suncrest Health currently has no licensed and no CON-approved hospice programs in Florida.

Total project cost is \$709,250 and includes cost of equipment, project development and start-up costs.

Pursuant to project approval, Suncrest Hospice Florida, LLC offers a total of 13 Schedule C conditions.



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**Transitions Intermediate Holdings, LLC (CON application #10708)** is a for-profit development stage Florida entity with no Florida hospice operating history. Transitions and affiliates have five hospice agencies in 124 counties, in the midwestern United States.

In this batching cycle, Transitions also proposes to establish new hospice programs in SAs 1, 3B and 6B.

The applicant proposes \$688,701 in total project costs, which include equipment, project development and start-up costs.

Transitions Intermediate Holdings, LLC offers a completed Schedule C cover page, but provides no Schedule C attachments and hence, offers no Schedule C conditions.

### **Need/Access:**

The co-batched applicants' proposed projects are in response to the fixed need pool for a new hospice in SA 9C.

### **Affinity Care of Palm Beach LLC (CON application #10698)**

emphasizes the following seven strategic initiatives to be implemented in order to accommodate current gaps in hospice care in the area:

1. Initiative in The Glades to Enhance Hospice Utilization
2. Enhance Hospice Utilization Amongst Hispanic and Black Minority Groups (including in The Glades)
3. Outreach to the Jewish Community through Collaboration with Rales Jewish Family Services, The Wisdom Circle and Other Organizations
4. Collaboration with Senior Primary Care Clinics to Elevate Hospice Utilization Amongst Seniors
5. Develop and Initiate a Community Paramedic Program with Local EMS to Reduce Unnecessary Trips to the Emergency Room
6. Dedicated Hospice Inpatient Units at Nursing Homes
7. Detailed Program and Outreach to Enhance Hospice Utilization for Dementia and Alzheimer's Disease

The applicant estimates year one total admissions of 188 and year two total admissions of 462.

**Brevard HMA Hospice, LLC (CON application #10699)** states a commitment to serve the following populations with unmet hospice needs in the area:

- Those in need of palliative care

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- Patients without primary caregivers
- The homeless population
- Veterans
- The Black and the Hispanic populations

Brevard contends that:

- None of the existing providers, or new providers, replicate LHC Group's deep post-acute care experience and expertise that complement hospice services along the care continuum
- LHC Group knows how to leverage its technology, clinical experiences and market presence to drive organic growth in market penetration rates to reach patients at the right time in their care journey for hospice services

The applicant projects to have 243 year one and 368 year two admissions.

**Catholic Hospice, Inc. (CON application #10700)** states that the following summarizes the need that the applicant has identified regarding unmet hospice need in the area, as well as the applicant's experience/ability to meet the need(s):

- Demographic trends and expected growth
- Access and availability of hospice services
- Enhance access to disease-specific care
- Enhance access to ethnic community-specific care
- Enhance access to homeless and low-income population
- Enhance access to the veteran population
- Other specialized experience
  - Ability to enhance the continuum of care
  - Provider with extensive palliative programming
  - Ability to enhance access to transportation
  - Provider with extensive chaplaincy care offerings

Catholic contends that additional points to consider are that Catholic Hospice:

- Is an experienced provider with existing resources
- Will expand myUnity by NetSmart – an electronic health record (EHR) to Palm Beach County
- Is a not-for-profit organization and for-profit and not-for-profit hospice care have different practices, services and programs that may be important considerations when looking for end-of-life care

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- Plans to develop relationship with local healthcare providers throughout the service area, including nursing homes and hospitals. Catholic Hospice will extend its existing agreement with Baptist Health South Florida (to including Bethesda Hospital East and Bethesda Hospital West) and Boca Raton Regional Hospital
- Is experienced in developing and planning comprehensive and ongoing education outreach

The applicant estimates 928 year one and 1,071 year two admissions.

**Florida Hospice, LLC (CON application #10701)** states having considered recent and independently conducted community health needs assessments by each of the following three Palm Beach County providers that identified similar populations with unmet hospice need:

- Jupiter Medical Center (2019)
- Lakeside Medical Center (2019)
- Boca Raton Regional Medical Center (2018)
- Uninsured
- Working Poor
- Migrant Community
- Low-Income Elderly
- Black or African American residents
- Hispanic residents
- Residents living in poverty-
  - At or below 100 percent FPL
  - At or below 200 percent FPL
- Homeless
- End-of-Life Issues

The applicant projects it will have 252 year one and 462 year two admissions.

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702)** states having considered recent community health needs assessment (performed in 2016) by each of the following two Palm Beach County providers that identified populations with unmet hospice need:

- Palm Beach County Department of Health
- Health Care District of Palm Beach County

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MorseLife also provided other sources as indicated in its response to item E.1.a. of this report to identify hospice need in the following Palm Beach County populations:

- Seniors age 65+, particularly the most frail and vulnerable – the elderly age 85+ living alone
- The Jewish community
- African Americans
- Hispanic/Haitians/Latinos
- Low income and indigent, including the homeless
- Veterans
- LGBT community
- Residents living in the Glades Area (western portion of Palm Beach County)
- Those suffering from cardiovascular diseases, cancer, respiratory diseases and infectious diseases

The Agency notes a letter of support for this project from David C. Fielding, President & CEO, Trustbridge, Inc. (or Trustbridge). Trustbridge has controlling interest over the following two existing SA 9C hospice programs, which reported, collectively, a total of 77.57 percent of all hospice admissions in SA 9C, for the 12-month period ending June 30, 2021:

- Hospice by the Sea, Inc.
- Hospice of Palm Beach County, Inc.

The applicant indicates the project to have 183/184 year one (or a cumulative total of 366) and 427 additional year two admissions (a cumulative total of 610).

**Odyssey Healthcare of Marion County, LLC (CON application #10703)** states a commitment to serve the following populations with unmet hospice needs in the area:

- Residents with end-stage heart disease
- The growing elderly populations, particularly individuals who are ages 65+, 75+ and 85+ (with those age 75+ especially recognized)
- Minority populations, especially Hispanic residents and Spanish speaking individuals (but also French, Portuguese and German speakers, as well as those who speak Yiddish or Hebrew)
- Individuals below or near the poverty line (including those who are below 200 percent and those who are below 300 percent of the poverty level)
- Homeless individuals and among these, those who are:
  - Sheltered
  - Unsheltered
  - Veterans

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The applicant projects 244 year one and 462 year two admissions.

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704)** indicates that some patients in the area who have unmet hospice needs include:

- Homeless or near homeless
- Hispanics
- Patients in remote sections of the county
- African-Americans
- End-stage cardiac patients
- Religious groups with specific end-of-life protocols

The applicant projects 313 year one admissions and 450 year two admissions.

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)** states a commitment to serve the following underserved groups with unmet hospice needs in the area:

- Indigent residents and particularly
  - The homeless
  - The population living under 185 percent of the Federal Poverty Level
  - Residents experiencing food insecurity
  - Elderly residents living alone
- Veterans
  - Particularly veterans residing in rural areas of SA 9C
- Patients with specific terminally ill diseases and diagnoses who can benefit from PruittHealth’s Pathways Programs

The applicant projects 140 year one and 327 year two admissions.

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706)** maintains that in part from conducting its own community needs assessment but also through other multiple sources, the following populations are experiencing unmet hospice needs in the area:

- Residents of Western Palm Beach County, “The Glades area of Belle Glade, South Bay and Pahokee
- Pediatric hospice patients and children experiencing grief, particularly those in the western portion of Palm Beach County
- Elderly residents living alone

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- Traditionally underserve patients, including:
  - LGBTQ+ residents
  - Hispanic/LatinX and Haitian residents
  - Jewish residents, particularly those experiencing low socio-economics
  - Residents with low literacy
  - Residents experiencing homelessness

Additionally, Seasons states the following SA 9C groups traditionally face barriers to hospice care and that Seasons has created special programs tailored to Palm Beach County's residents, particularly:

- Residents of High Elder Needs Index (ENI) Areas
- Older residents living alone
- Patients with heart disease
- Patients with Alzheimer's and dementia

The applicant projects 187 year one and 408 year two admissions.

**Suncrest Hospice Florida, LLC (CON application #10707)** contends that following populations, or those suffering from the following illnesses, are experiencing unmet hospice needs in the area:

- Racial and ethnic minorities (Black and Hispanic residents)
- Low-income residents, particularly those toward the western portion of the county (the Belle Glade/Pahokee markets)
- Veterans
- Homeless
- LGBTQIA+
- Hospice patients receiving an inadequate number of hospice team visits, particularly among RNs, social workers and aides:
  - In the last seven days of life
  - In the last three days of life
- Cardiovascular Diseases (including heart failure, stroke and hypertension)
- Cancer (including breast, cervical, prostate and colorectal cancer)
- Respiratory Diseases (including chronic lower respiratory and lung diseases)
- Kidney Disease (including nephritis, nephrosis and nephrotic syndrome)
- Chronic Liver Disease
- Diabetes Mellitus
- Alzheimer's Disease

The applicant projects 156 year one and 570 year two admissions.

**Transitions Intermediate Holdings, LLC (CON application #10708)**

contends that this proposed hospice program should be approved for the following reasons:

- Above and beyond clinical care model including:
  - 24/7/365 availability
  - Comprehensive IDG care team
  - Extensive ancillary services including but not limited to End-of-Life Doula support, music and massage therapy, animal visits, and more
  - Vigil sitting commitments
  - Palliative-to-hospice connection
  - Extensive software integration
  - Remote patient monitoring
- Exceeding national standards, receiving a 4.5 Star Rating
- Hospice and palliative operations in MI, IL, IN, and PA
- Access to Routine, Respite, Continuous and InPatient care in either the home or a care facility
- Staffing capabilities

Additionally, Transitions states a commitment to serving the following populations with unmet needs (persons with/persons who are):

- Cancer
- End Stage Renal Disease
- End Stage Dementia and Alzheimer's Disease
- End Stage Pulmonary Disease
- End Stag Vascular Disease
- Veterans

The applicant projects 50 year one and 100 year two admissions.

**Quality of Care:**

**All** co-batched applicants demonstrate the ability to provide quality care.

**Affinity Care of Palm Beach LLC (CON application #10698):**

- Is a development stage entity with no licensed operations or history
- Has two affiliate hospice programs in Florida but these programs do not yet have CHAP and HIS quality scores because neither of the programs have been operational long enough for CHAP and HIS measures to be determined and issued
- Neither of the applicant's two affiliate hospice programs in Florida have had a substantiated complaint since they began operations (with each of the two programs' licensed operations being operational for less than the three-year period ending October 25, 2021)

**Brevard HMA Hospice, LLC (CON application #10699):**

- Is a Florida entity and is affiliated with LHC Group which current operates one hospice program in Florida in SA 7A
- LHC's most currently available Agency-linked CHAPS measure for:
  - Willingness to Recommend the Hospice score was 90
  - An overall CHAPS average score of 83
- LHC's most currently available HIS measure for:
  - Patients who got an assessment of all seven HIS Quality Measures was 98.2 percent
- For the three years ending October 25, 2021, LHC's sole Florida hospice program (in SA 7A) had no substantiated complaints

**Catholic Hospice, Inc. (CON application #10700):**

- Is a Florida, non-profit, faith-based hospice providers in SAs 10 and 11, parented by Catholic Health
- Catholic Hospice's most currently available Agency-linked CHAPS measure for:
  - Willingness to Recommend the Hospice score was 76
  - An overall CHAPS average score of 76
- Catholic Hospice's most currently available HIS measure for:
  - Patients who got an assessment of all seven HIS Quality Measures was 99.6 percent
- For the three years ending October 25, 2021, Catholic Hospice's hospice programs (in SAs 10 and 11) had a total of one substantiated compliant

**Florida Hospice, LLC (CON application #10701):**

- Is a development stage Florida entity with no licensed hospice operations in Florida and is not CON-approved to have licensed operations in Florida.

Florida Hospice parent's (Graham's) existing hospice programs in the midwestern United States (in Illinois, Michigan and Pennsylvania) all had the following quality measure scores regarding the CMS HIS and CAHPS (January 2021-June 2021)

- Exceeded CMS national benchmarks on quality scores for each of eight HIS measures
- Overall scored favorably compared to CMS national benchmarks on CAHPS measures, however:



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- Regarding the measure “Willingness to Recommend the Hospice”, in which the national average was 85, Graham’s hospices, collectively, had the following scores regarding this measure:
  - 92 (highest score)
  - 72 (lowest score)
  - 80 (mode score)
  - 81 (median score)
  - 83 (average score)

### **MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702):**

- Is an existing and operational hospice provider in SA 9C, pursuant to ss 408.036(3)(a), Florida Statutes and the Agency-issued #E170015, which is seeking to expand to serve the entirety of SA 9C
- Does not currently have a HIS quality measure score
- Provides January 1, 2018 through December 31, 2019 CAHPS scores indicating that MorseLife:
  - Exceeded each of the eight quality measures
    - when compared to Florida overall
  - Exceeded six of the eight referenced quality measures
  - Matched one of the eight referenced quality measures
  - Fell short (by one percent) for one of the eight quality measures
    - when compared to the US overall
  - Had a “Willingness to Recommend this Hospice score of 89, compared to a Florida overall and a US overall score of this measure of 84 (each)
- Agency records indicate that for the three-year period ending October 25, 2021, Palm Beach Hospice by MorseLife had no substantiated complaints.

### **Odyssey Healthcare of Marion County, LLC (CON application #10703):**

- Is an existing and operational hospice provider in Florida and is parented by Kindred at Home which operates licensed hospice operations in six Florida SAs
- Kindred at Home is accredited by the Accreditation Commission for Health Care in all of its Florida hospice operations
- Odyssey/Kindred at Home’s most currently available Agency-linked CHAPS measure for:
  - Willingness to Recommend the Hospice score was 83
  - An overall CHAPS average score of 80

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- Odyssey/Kindred at Home's most currently available HIS measure for:
  - Patients who got an assessment of all 7 HIS Quality Measures was 96.8 percent
- During the three years ending October 25, 2021, Kindred at Home's programs had two substantiated complaints

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704):**

- Is a not-for-profit Florida entity, parented by The Systems, a national provider of hospice, home care, assisted living, rehabilitation and nursing home services
- The Systems has licensed hospice programs, SNFs and ALFs in Florida
- ProMedica's affiliated hospices most currently available Agency-linked CHAPS measure for:
  - Willingness to Recommend the Hospice score was 81
  - An overall CHAPS average score of 78
- ProMedica's affiliated hospices most currently available HIS measure for:
  - Patients who got an assessment of all seven HIS Quality Measures was 98.3
- Agency records indicate that, for the three-year period ending October 25, 2021, the parent's affiliated hospice programs in SAs 4A, 10 and 11 has no substantiated complaints

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705)** is a development stage Florida entity with no licensed hospice operations in Florida and is not CON-approved to have licensed operations in Florida. However, PruittHealth has exceeded 13 of 16 quality measures when compared to national averages, pursuant to HQRP and HCAHPS data results (for the 12 months ending June 30, 2020). The first five bullets below are results narratively highlighted by PruittHealth and the sixth bullet is noted by the Agency:

- Overall Rating of Hospice
  - PruittHealth 2019 (85.0 percent) and 2020 (83.0 percent)
    - National average of 81 percent
- Comprehensive Assessment
  - PruittHealth 2019 (90.8 percent) and 2020 (93.5 percent)
    - National average of 88.7 percent

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- Visits in the Last 3 Days by an RN
  - PruittHealth 2019 (90.8 percent) and 2020 (92.1 percent)
    - National average of 82.6 percent
- Getting Timely Care
  - PruittHealth 2019 (77.0 percent) and 2020 (79.0 percent)
    - National average of 78.0 percent
- Getting Help for Symptoms
  - PruittHealth 2019 (78.0 percent) and 2020 (76.0 percent)
    - National average of 75.0 percent
- Would Recommend Hospice
  - PruittHealth 2019 (82.0 percent) and 2020 (81.0 percent)
    - National average of 84.0 percent

### **Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706):**

- Is a development stage Florida Entity
- Is an affiliate of Seasons Hospice and Palliative Care, Inc., directly owned by AccentCare, Inc, and has existing hospices in SAs 5A, 5B, 6A, 10 and 11
- Seasons affiliated hospices most currently available Agency-linked CHAPS measure for:
  - Willingness to Recommend the Hospice score was 75
  - An overall CHAPS average score of 74
- Seasons affiliated hospices most currently available HIS measure for:
  - Patients who got an assessment of all 7 HIS Quality Measures was 92.7
- Noted that CAHPS and HIS existing quality scores did not reflect feedback being received from patients/families and hence:
  - Engaged Hospice Advisors to conduct a 10-question telephone survey in September/October 2021 to identify any ongoing quality issues and to assess what changes were needed
  - Is using the survey responses and comments to improve procedures, training and supervision for Seasons' Florida hospice staff
- Agency records indicate that, for the three-year period ending October 25, 2021, Seasons affiliated Florida hospice programs had a total of one substantiated complaint citing two categories.

### **Suncrest Hospice Florida, LLC (CON application #10707):**

- Is a development stage, for-profit Florida entity
- The parent does not have and is not CON-approved to have a licensed hospice program in Florida

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- Without specifying the quarter or timeframe to which the scores apply, Suncrest indicates its affiliated providers had the following quality scores:
  - CHAPS measure for:
    - Willingness to Recommend Suncrest score of 88 percent
    - National average of 84 percent
  - HIS measure for:
    - Comprehensive Assessment of 98.7 percent
    - National average of 90.3 percent

**Transitions Intermediate Holdings, LLC (CON application #10708)** is a development stage Florida entity with no licensed hospice operations in Florida and is not CON-approved to have licensed operations in Florida. However, Transitions contends that compliance with the CHAP Standards of Excellence will continue to be put forward in Florida if the project is approved. Affiliated Transitions Hospice, LLC dba Transitions Hospice (in the State of Illinois):

- Received a July 27, 2020 CHAP 2020 Accreditation Letter to indicate that the affiliate was found to be in compliance with the CHAP Standards of Excellence (site review dates of June 8, 2020 to June 12, 2020)
- Transitions Hospice of Central Illinois received the following CHAP scores/ratings:
  - 85 percent-overall rating of hospice care compared to
    - National rating of 85 percent
    - State of Illinois rating of 82 percent
- Would You Recommend This Hospice?
  - 85 percent (definitely yes)

### **Financial Feasibility/Availability of Funds:**

**None** of the co-batched projects, strictly, from a financial perspective, will have a material impact on price-based competition.

**The following applies to all applicants except #10708 as stated below.** Funding for this project and the entire capital budget should be available as needed.

### **Transitions Intermediate Holdings, LLC (CON application #10708):**

- Funding for this project and the entire capital budget is in question.

**Financial feasibility**

**Affinity Care of Palm Beach LLC (CON application #10698):**

- This project appears to be financially feasible, although patient days, and thus revenue, may be understated

**Brevard HMA Hospice, LLC (CON application #10699):**

- This project appears to be financially feasible, although patient days may be slightly understated and/or revenues slightly overstated

**Catholic Hospice, Inc. (CON application #10700):**

- This project appears to be financially feasible, although patient days, and thus revenue, may be understated

**Florida Hospice, LLC (CON application #10701):**

- This project appears to be financially feasible, although patient days may be slightly understated and/or revenues slightly overstated

**MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife (CON application #10702):**

- This project appears to be financially feasible, although patient days, and thus revenue, may be understated

**Odyssey Healthcare of Marion County, LLC (CON application #10703):**

- This project appears to be financially feasible, although patient days may be slightly overstated and/or revenues slightly understated

**ProMedica Hospice of Palm Beach County, FL, LLC (CON application #10704):**

- This project appears to be financially feasible, although patient days may be slightly overstated and/or revenues slightly understated

**PruittHealth Hospice – Southeast Florida, LLC (CON application #10705):**

- This project appears to be financially feasible, although patient days may be slightly understated and/or revenues slightly overstated

**Seasons Hospice & Palliative Care of Palm Beach County, LLC (CON application #10706):**

- This project appears to be financially feasible, although patient days may be understated and/or revenues overstated

**Suncrest Hospice Florida, LLC (CON application #10707):**

- This project appears to be financially feasible, although patient days may be overstated and/or revenues understated

**Transitions Intermediate Holdings, LLC (CON application #10708):**

- This project appears to be financially feasible, although patient days may be slightly overstated and/or revenues slightly understated

**Medicaid/Medically Indigent:**

Hospice programs are required by federal and state law to provide hospice patients with inpatient care when needed (42 Code of Federal Regulations 418.108). Hospice care also must be provided regardless of ability to pay and regardless of age, race, religion, sexual orientation, diagnosis, payer source or financial status. Therefore, the Agency will not impose a charity care or Medicaid patient day condition on an applicant.

**All** applicants discussed historical and proposed service to Medicaid and medically indigent patients. See Item E.3.g.

*CON application #10702, (MorseLife Hospice Institute, Inc.), on balance, best satisfied the statutory and rule criteria to meet SA 9C's published need—this included identifying:*

- *The proposed populations that are being underserved for hospice*
- *Services/programs proposed to make hospice more accessible and available to underserved populations*
- *Strong local community support from SA 9C health organizations including two of the three other existing hospices (three of four, if you count MorseLife), social services organizations and other entities and*
- *MorseLife is in the unique position of having well-established community relationships and having a high quality, licensed hospice which presently serves a portion of SA 9C residents and should easily be able to expand its existing market.*

**G. RECOMMENDATION**

Approve CON #10702 MorseLife Hospice Institute, Inc. d/b/a Palm Beach Hospice by MorseLife to establish a new hospice program in Service Area 9C. The total project cost is \$470,900.

CONDITIONS:

The following conditions improve access to quality hospice services that benefit populations with unmet needs:

1. MorseLife Hospice Institute will establish a physical presence in Belle Glade to ensure access to hospice care and provide additional outreach to western communities.
2. MorseLife Hospice Institute will cover the cost of assisted living services on the MorseLife campus, allocating 2 units/beds for hospice patients without caregivers or ability to pay for assisted living. The monitoring report includes the number of patients and days for which assisted living is provided by the hospice program at no cost to the patient.
3. MorseLife Hospice Institute will offer its Palliative Care Program to residents of Hospice Service Area 9C to improve the quality of life for individuals with a chronic, serious, or life-threatening disease. The annual, required monitoring report identifies the number of patients served by the palliative care team.
4. MorseLife Hospice Institute will offer its Rest Assured Program to residents of Hospice Service Area 9C to provide companionship to those at the end of life with the goal to ensure that no one dies alone. The annual, required monitoring report identifies the number of patients without a caregiver that received companionship services.
5. MorseLife Hospice Institute will provide transportation services related to clinical care to Hospice and Palliative care clients as needed at no additional cost to the hospice or patient/resident. *This is especially beneficial to hospice residents of advanced age and low income residents of the Glades Area where access to health services is more difficult due to limited public transportation services.* The monitoring report identifies the number of trips provided.

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6. MorseLife Hospice Institute will continue participation in the We Honor Veterans program, advancing to Level 5 by the second year of hospice program expansion.
7. MorseLife Hospice Institute will provide cultural sensitivity training to all its hospice and palliative care employees. The monitoring report identifies the number of employees receiving such training.
8. MorseLife Hospice Institute will become Services and Advocacy for Gay Elders (SAGE) Platinum Certified by the end of its first year of expansion into Hospice Service Area 9C.
9. MorseLife Hospice Institute commits to serving patients with HIV/AIDS. The annual monitoring report includes the number of individuals with a diagnosis of HIV/AIDS and days of care for which hospice or palliative care is provided.
10. MorseLife Hospice Institute will provide end of life care in the spirit of Jewish traditions for those of the Jewish faith.
11. MorseLife Hospice Institute will employ or contract with a Rabbi, Priest and non-denominational Christian Pastor to ensure access to appropriate faith-based services and bereavement care.
12. MorseLife Hospice Institute will employ bilingual staff. The annual monitoring report identifies the number of staff employed and languages other than English.

The following conditions assure access to services not specifically covered by private insurance, Medicaid, or Medicare, but improve quality of care:

13. MorseLife Hospice Institute commits to provide Art Therapy (Art Without Boundaries). The annual monitoring report includes the number of individuals that received Art Therapy within the hospice program.
14. MorseLife Hospice Institute commits to provide access to Cannabis-Based Therapy. The annual monitoring report includes the number of individuals that received Cannabis-Based Therapy within the hospice program.



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15. MorseLife Hospice Institute commits to provide Legacy Projects. The annual monitoring report includes the number of Legacy Projects completed for hospice families.
16. MorseLife Hospice Institute commits to provide Massage Therapy. The annual monitoring report includes the number of individuals that received Massage Therapy within the hospice program.
17. MorseLife Hospice Institute commits to provide Music Therapy (Music and Memory). The annual monitoring report includes the number of individuals that received Music Therapy within the hospice program.
18. MorseLife Hospice Institute commits to provide Pet Therapy. The annual monitoring report includes the number of individuals that received Pet Therapy within the hospice program.
19. MorseLife Hospice Institute commits to provide Reiki Therapy (Alternative Healing Therapy). The annual monitoring report includes the number of individuals that received Reiki Therapy within the hospice program.
20. MorseLife Hospice Institute commits to provide Virtual Reality (VR) experiences. The annual monitoring report includes the number of individuals that received VR experiences within the hospice program.

The following conditions expand research and educational opportunities to increase the number of qualified hospice and palliative care workers:

21. MorseLife Hospice Institute will provide continuing education units (CEU's) on an ongoing basis. The annual monitoring report identifies the date each course is offered and the topic covered.
22. MorseLife Hospice Institute will provide training opportunities for the following positions:
  - Nurses
  - Social Workers
  - Chaplains
  - Nutritionists

The annual monitoring report includes the number of interns by program of study that received training within the hospice program.

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The following benefits are precluded as conditional requirements of the CON due to licensing and accreditation requirements involving other organizations. However, MorseLife Hospice Institute is committed to achieving the following benchmarks:

1. MorseLife Hospice Institute will submit its license application to amend its service area to include Hospice Service Area 9C, Palm Beach County, within 10 days of receipt of a valid CON.
2. MorseLife Hospice Institute will seek to maintain standards of excellence through accreditation with the Community Health Accreditation Partner (CHAP) organization. The annual monitoring report includes a copy of the current accreditation certificate or letter.
3. With expansion of the hospice program, MorseLife Hospice Institute will expand the Geriatric Fellow program (of the Joseph L. Morse Health Center, Inc.'s Teaching Nursing Home) to introduce a hospice rotation to the curriculum. (Subject to the Joseph L. Morse Health Center, Inc. maintaining its teaching nursing home status).

Deny CON #s 10698, 10699, 10700, 10701, 10703, 10704, 10705, 10706, 10707 and 10708.

**AUTHORIZATION FOR AGENCY ACTION**

Authorized representatives of the Agency for Health Care Administration adopted the recommendation contained herein and released the State Agency Action Report.

DATE: December 17, 2021



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James B. McLemore

**Operations and Management Consultant Manager  
Certificate of Need**