

STATE AGENCY ACTION REPORT
ON APPLICATIONS FOR CERTIFICATE OF NEED

A. PROJECT IDENTIFICATION

1. Applicant/CON Action Number

Citadel Healthcare LLC/CON #10657

66 West Flagler Street, Suite 900
Miami, Florida 33140

Authorized Representative: Wilfred Braceras
(786) 304-3308

Continuum Care of Miami Dade LLC/CON #10658

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

Authorized Representative: Patti Greenberg
(510) 499-9977

Moments Hospice of Miami, LLC/CON #10659

820 Lilac Drive, N., Suite 210
Golden Valley, Minnesota 55422

Authorized Representative: Sol Miller
Chief Executive Officer
(612) 655-5242

2. Service District/Subdistrict

Service Area (SA) 11 (Miami-Dade and Monroe Counties)

B. Public Hearing

A public hearing was not held or requested.

Letters of Support

The applicants submitted letters of support and some support letters were received by the Agency independently.

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Citadel Healthcare LLC (CON application #10657) includes of letters of support from:

- René Garcia-Commissioner-District 13, Miami-Dade Board of County Commissioners former Florida State Senator
- Alex Penelas, P.A., former Miami-Dade Mayor and City Councilor
- Horace G. Feliu, former Mayor of South Miami
- Dr. Jerry Jackson, M.D., Monroe County Health Department.
- Katherine Panesso, CEO, Larkin Community Health Palm Springs Campus

Additional letters came from local and out of area clinicians and 16 local physicians, managed care executives, community leaders, local businesses, and residents of the community. Many letters were variations of a form letter expressing each supporter's belief that Citadel and Med-care's hospice will benefit Miami-Dade and Monroe Counties.

Complete letters of support are in Appendices AAA - DDDD of CON application #10657.

Continuum Care of Miami Dade LLC (CON application #10658)

received a significant number of letters of support from community organizations, business leaders, religious letters, elected officials, clinicians and physicians, home health agencies, nurse registries and other health care organizations. Many letters were variations of a form letter citing unique services Continuum provides and belief that Continuum's hospice program will benefit Miami-Dade and Monroe Counties residents.

Some writers include:

- René Garcia-Commissioner-District 13, Miami-Dade Board of County Commissioners former Florida State Senator,
- Former State Senator Anitere Flores,
- Kyle Rand, CEO, Rendeever, Inc., Virtual Reality Partner
- Chaplain (COL) Joanne S. Martindale, BCC – VA Chaplain

Continuum has support letters from 27 of Miami Dade County's 54 community nursing homes, which are listed in its response to Item E.1.a. of this review. Four of these are from nursing home administrators indicating they "look forward to developing a collaborative relationship with Continuum Care and treating their (Continuum Care's) patients via contract in our facility".

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Five hospital executives and the president of the South Florida Hospital & Healthcare Association also submitted letters in support of Continuum. Eight letters were from representatives of Assisted Living Facilities.

Continuum's letters of support were included in the application's Tab 5.

Moments Hospice of Miami, LLC (CON application #10659) states that it received numerous letters of support from within and outside of SA 11. Moments has general letters of support from the following SA 11 nursing homes:

- Aventura Rehab & Nursing Center
- Claridge House
- Crystal Health & Rehab Center
- East Ridge at Cutler Bay
- Floridean Nursing and Rehabilitation Center
- Kendall Lakes Rehabilitation Center
- Palm Vista Health and Rehabilitation Center
- Palmetto Subacute Care Center
- Regents Park at Ventura
- Signature Healthcare of Brookwood Gardens
- South Dade Nursing and Rehabilitation Center
- The Sands at South Beach Rehab and Nursing Center
- West Gables Health Care Center.

Moments provides a table showing its letters of support volume by categories in the application's Volume I, page 86.

C. PROJECT SUMMARY

The applicants are proposing to establish a SA 11 hospice in response to the published need.

Citadel Healthcare LLC (CON application #10657) is a start-up entity created for the purpose of developing a Certificate of Need and licensing a hospice program upon approval. Med-Care Hospice Service is a registered fictitious name. Within its application the applicant may be referred to as the applicant, Citadel or Med-Care Hospice.

The applicant's ultimate parent is B & B Holding Enterprises Inc., which has a network of health care provider entities including Med-Care Home Health Services, Home Health Services of South Florida, Inc., Med-Care Infusion Services, Inc. and South Eastern Health Management Associates, Inc. Services provided by B & B entities include home

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health services, pharmacy services, durable medical equipment, medical supplies, and an ambulatory diagnostic center. This would be the parent's first hospice program.

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

The applicant proposes \$416,254 in total project costs.

Citadel states that "Given the strength of the organization and its commitment to serve the needs of the residents of District 11, the applicant is willing to condition this application on the following terms:

1. Citadel Healthcare LLC will establish and maintain two offices to serve the needs of Miami-Dade and Monroe Counties (one at start-up of the hospice program and one within six months of startup). Med-Care currently has eight available office locations in District 11 and initially expects to utilize space within its corporate office located at 760 Ponce De Leon in Coral Gables as its primary office. The 2nd office would be located in one of his other existing offices.
2. Citadel Healthcare LLC commits to a minimum of 75% of its employees being bi-lingual and to provide translated forms and literature as needed.
3. Citadel Healthcare LLC commits to seek accreditation by the Community Health Accreditation Program (CHAP), the Accreditation Commission for Healthcare (ACHA), or JCAHO at the earliest date possible but no later than within 2nd year of following the commencement of operations.
4. Implementation of 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 capability which will travel as appropriate to many of the following: community centers, health facilities, churches, temples, 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 spread out over several years.

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5. Med-Care Hospice Services commits to provide a minimum of two educational seminars per year focusing on “End-of-life” issues and hospice with a particular focus on meeting the needs of traditionally underserved patient populations. In addition, the applicant will provide a listing of educational materials regarding “End-of-life” issues at these seminars.
6. Implementation of Kinnser electronic medical records (or equivalent) system at start-up, including the use of mobile point-of-care devices.
7. The development of a Volunteer Program reflecting “Vigil services” who are equipped with a team of specifically trained volunteers available to respond on short notice to provide the 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 bedside of their loved ones during the dying process.
8. Offering of internship experiences for positions such as social workers, bereavement counselors, chaplains, nursing students and medical students. We will seek the contracts with local universities, colleges and technical schools.
9. The applicant will agree to not solicit funds to be sensitive to the needs and relationships of the existing providers. However, it is likely that patients and families who have benefited from the care provided by the applicant might wish to make a donation. They will be provided a list of local charities, and 501(c)(3) foundations to encourage the funds remain in the community.
10. Recruitment of a minimum of 50% 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.
11. Provision of alternative therapies beyond the core hospice benefit, such as massage therapy, pet therapy, music therapy, art, or cosmetic care, and other such alternative therapies when eligible and needed.
12. Citadel Healthcare LLC commits to providing tuition reimbursement for assistance for Citadel staff wishing to obtain Hospice Certification, further enhancing the quality of care for hospice patients/residence, as well as supporting staff ability to advance professionally.

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13. Offering of specific programs and targeted outreach efforts to serve patients with non-cancer diagnoses.
14. (There is no #'14' or condition listed by the applicant).
15. Citadel Healthcare LLC conditions this application on not seeking a CON approval for the development of a freestanding hospice house in District 11 for a minimum of two years after the initiation of the service.
16. Developing a volunteer community advisory committee to ensure the orderly development of needed programs and services. This committee would be expected to grow and change as the community itself grows and changes. Initial members would include not only community leaders but also members of the public not typically included on advisory committees (i.e., the small parish religious leader and not a member from the Arch Diocese). The goal would be to bring in "representatives of the people"
17. Establish a transition team to maintain the highest level of care as individuals currently in management retire. The applicant's management team consists of individuals ranging in age from 47 - 76. While the face and reputation of the organization has been Mr. Wilfred Braceras for nearly 40 years; he has recognized the need for younger minds and has personally trained Joshua Ruskin (age 50), Aymee Fernandez (Age 47), Angel Muina (Age 57), and two children: 41-year-old twins John Braceras, and Elizabeth Braceras to continue in his place upon retirement.
18. Maintaining professional staff including but not limited to experienced hospice administrator(s), medical directors, chaplains, registered nurses, certified nursing assistants, marketing personnel and other individuals who will be responsible for developing and implementing new programs, making the community aware of these programs, working with the "Community Volunteer Advisory committee" to assure the needs of the community are met, monitoring existing policies and procedures to assure they do not become stale, developing new policies and procedures, and maintaining the most up-to-date hospice services which are proven to be valuable to all of the patient population being served.

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19. Citadel Healthcare LLC conditions this application to develop a program for “End-Stage Pulmonary” (as conditions change and other diagnoses come to the forefront the program may change) patients which may include telehealth.

Reviewer notes that there are grammatical errors and the number 14 was omitted in the listing of conditions.

Continuum Care of Miami Dade LLC (CON application #10658) is a newly formed for-profit entity for the purpose of initiating hospice services in SA 11. ‘Continuum’ is an affiliate of Continuum Care Hospice and Affinity Health Management, which collectively operate five affiliate hospice programs in Florida, Washington, New Jersey, Virginia and Ohio. The applicant’s affiliate, Continuum Care of Broward, LLC, licensed 11/5/20 in its one licensed Florida Hospice and it has one approved CON (#10607) to establish a hospice program in SA 8D. In this batching cycle, the applicant’s Affinity affiliate has an application to establish a hospice in SA 6C - Manatee County.

The applicant expects issuance of license September 1, 2021 and initiation of service on October 1, 2021.

Continuum proposes \$371,340 in total project costs.

Continuum states that “reflective of its commitment to serve any and all terminally-ill residents of District 11, Continuum Care of Miami-Dade is willing to accept any such conditions on its Certificate of Need based on any representations made throughout this document”. Specific conditions to be met by Continuum Care of Miami-Dade if awarded the CON are:

1. The Applicant will implement its Virtual Reality Program upon licensure of its program. It will be made available to all eligible Continuum Miami Dade patients.
2. 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 Continuum Miami Dade patients.
3. The Applicant will implement its Equine Therapy Program upon Medicare certification of its program. It will be made available to all eligible Continuum Miami Dade patients who are physically able to make the trip to the stable partner.

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4. The Applicant will implement a minority outreach program for the Black and Hispanic population assembling an appropriate care team for assessment and treatment of this population.
5. The Applicant will become accredited by CHAP once certified.
6. The Applicant will assure each patient has five to seven Home Health Aide visits per week, provided this is acceptable to the IDT, patient and family.
7. The Applicant will assure each patient has a minimum of two RN visits per week, provided this is acceptable to the IDT, patient and family.
8. The Applicant will seek to respond to all its 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.
9. The Applicant will implement its Continuum Palliative Resources program within six months of receiving its Medicare certification.
10. The Applicant will implement its Veterans outreach program, We Honor Veterans, once certified.

Continuum contends that based on the above information and conditions, supported by a detailed analysis throughout this application and information provided in Supporting Documents, it has demonstrated the need for the Agency to approve its CON application.

Moments Hospice of Miami, LLC (CON application #10659), a Florida limited liability company, is an affiliate of Guardian Hospice NM LLC and Affiliates d/b/a Moments Hospice. The applicant indicates that Moments Hospice started in 2017 and presently operates a total of ten hospice agencies in Minnesota, Iowa, and Wisconsin and has two offices pending licensure survey in Chicago, Illinois. Moments Hospice expects issuance of license August 1, 2021, and initiation of service September 1, 2021.

The applicant proposes \$529,276 in total project costs.

Moments Hospice of Miami states it will accept additional conditions based on any representations made in this application and proposes the following Schedule C conditions to the project's approval:

1. Open Access Program

District 11 is home to large Hispanic, Black, and Jewish communities that are not choosing hospice care because they are opposed to signing Do Not Resuscitate (DNR) orders and, in some cases, want to continue receiving interventions such as total parenteral nutrition (TPN) and intravenous fluids (IV). Therefore, Moments commits to admitting patients through the Open Access program discussed in Schedule B of this application (page 104), upon commencement of operations. The program will include these elements:

- a. Accepting eligible hospice patients, regardless of their code status.
- b. Accepting eligible hospice patients receiving treatments such as IV therapy, palliative blood transfusions, palliative TPN, hi-flow oxygen, etc.
- c. Evening and Weekend Admissions- On-call staff equipped to admit patients will be available 24 hours a day, 7 days a week, 365 days of the year.
- d. Palliative Care- Open Access includes palliative care to manage patients' pain and symptoms and provide patient and family education on disease management and advanced care planning.

2. Provide Initial Moments Program

Moments conditions this application on providing its Initial Moments program upon commencement of operations. Moments has used this program to increase hospice utilization among long-term care residents in its existing service areas. The Initial Moments program focuses on the first week of hospice care for patients residing in a long-term care facility and is designed to meet the more complex challenges of facility-based hospice care.

3. Provide Final Moments Program

The final week or weeks of life are challenging for patients and family members. The Final Moments Program increases visit frequency during this time to provide support and assistance navigating these challenges. The Final Moments Program is detailed in Schedule B of this application (page 32). Moments conditions this application on providing the Final Moments Program to its hospice patients in District 11 upon commencement of operations. The program will include these elements:

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- a. Moments will utilize Muse Healthcare Analytics or a similar program to identify patients entering their Final Moments. Muse Healthcare Analytics has been described in Schedule B (page 33). Moments commits to implementing the program upon commencement of operations.
- b. Moments will implement the Death Doula program upon commencement of operations. This program is described on schedule in Schedule B (page 61).

4. Specialty Clinical Programs

Moments has developed three diagnosis-specific hospice clinical and outreach programs and commits to implementing these programs in District 11. Each program takes an aggressive approach to symptom management to improve quality of life and reduce hospital admissions. Each program also has a community education element to increase hospice utilization. The three programs are described briefly below, followed by the conditions.

- a. Moments Heart was developed for patients with cardiac diagnosis to manage symptoms and reduce the frequency of exacerbations and hospital readmissions.
- b. Moments Breathe aims to reduce hospitalizations due to unmanaged dyspnea and anxiety.
- c. Moments Respect was developed for patients with Alzheimer's disease and their families. The program improves quality of life through gentle care and family education.

Moments conditions this application on providing its Heart, Breathe, and Respect programs to hospice patients in District 11. The programs are described in schedule B (page 66) and will include these elements:

- a. Moments Staff Education: Moments will train all IDG staff on the Moments Heart Program, Moments Breathe Program, and Moments Respect Program, Nurses and Certified Nursing Aides will receive additional training beyond that of the IDG. The training program will be implemented at the commencement of operations.
- b. Community Education: Moments will provide community education programs to inform the community on cardiac disease, pulmonary disease, and Alzheimer's disease, and

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the benefits of hospice for patients with these diagnoses and their families. Moments will provide education events related to each of their diagnosis-specific programs twice a year, during the first two years of operations.

- c. Health Care Provider Education: Moments will offer area health care providers continuing education presentations on these three diagnosis, and how disease progression may lead to a terminal prognosis and hospice eligibility. Moments will offer these educational programs on a quarterly basis during the first two years of operations and will provide Continuing Education Units (CEU) for registered nurses (RNs) and licensed social workers (SWs) at no charge. This will increase the options for free CEUs available to increase knowledge among the health care community. Moments will make programs available to skilled nursing and assisted living facility staff.
- d. A Respiratory Therapist will be contracted and available upon commencement of hospice operations. The respiratory therapist may provide community education, make patient visits as part of the IDG to provide collaboration and recommendation, and assist with staff training related to pulmonary conditions and the Moments Breathe program.

The Applicant will document compliance with the educational elements by submitting copies of curricula, schedules, and attendee lists to AHCA in the annual conditions compliance report. The Applicant will document compliance with the respiratory therapist condition by submitting the CV and start date of the respiratory therapist in the annual conditions compliance report.

5. Charity Care

To ensure low income, uninsured patients have the care they need, Moments conditions this application on providing charity care for at least five percent of total admissions.

6. Inclusion & Access Advisory Committees and Subcommittees

Moments recognizes the diverse communities in District 11 who experience cultural barriers to care, including several Hispanic cultures, Black (Haitian, African American, etc.) residents, Jewish residents, and LGBTQIA+ residents. To identify and remove

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barriers to access hospice for members of these communities, Moments has created Inclusion & Access Advisory Committee (IAAC) comprised of representatives from these communities. The IAAC will advocate, advise and assist Moments in developing programs to increase hospice utilization by these communities.

Moments has already assembled a diverse group of IAAC members representative of District 11's demographics. More information on the committee can be found in schedule B of this application (page 129). The Applicant will demonstrate compliance with this condition by submitting a progress report on the IAAC and minutes of the IAAC meetings as part of the annual conditions compliance report.

a. Outreach Subcommittees

Moments conditions this application on creating the subcommittees listed below during the first year of its operations. Moments will work with each subcommittee to further its understanding of that community's end-of-life needs and to ensure its programming meets those needs. Each subcommittee will be comprised of residents of District 11 and professionals from health clinics, hospitals, and nursing homes in District 11. The Applicant will demonstrate compliance with this condition by submitting a progress report with the dates of subcommittee meetings as part of the annual conditions compliance report.

- Hispanic Community Subcommittee
- Black Community Subcommittee
- Jewish Community Subcommittee

b. Provider Advisory Committee

Within the first year of commencing operations, Moments will create a Provider Advisory Committee comprised of health care providers in District 11. This committee will make recommendations for new hospice services and for strategies to increase awareness and utilization of hospice services. The Applicant will demonstrate compliance with this condition by submitting a progress report of the program and dates of the committee meetings as part of the annual conditions compliance report.

c. Family Advisory Committee

Hospice use rates in District 11 are below the state average in part because many residents of District 11 take care of their loved ones in their homes at the end of life. District 11 hospice utilization rates are low for patients in skilled nursing and assisted living facilities. During the first year of operations, Moments will create a Family Advisory Committee comprised of family members of Moments Hospice patients this committee. This committee will provide feedback on programming and suggest ways to improve services to family and caretakers, whether the loved one lives with the family or in skilled nursing or assisted living facilities. The Applicant will demonstrate compliance with this condition by submitting a progress report of the program and dates of the committee meetings as part of the annual conditions compliance report.

7. Maximizing Geographic Access through Office Locations and Staff

District 11 covers a large geographical area, and a hospice should have offices throughout District 11 to enhance visibility of hospice services and to support staff and volunteers. Moments conditions this application on opening three hospice offices during its first year of operations and the related startup expenses are included on Schedule 1. Moments will up open two main office locations immediately, one in the Hialeah area and one in the Homestead area. Upon Medicare certification, Moments will open a third, smaller satellite office in or near Key West in Monroe County. As discussed in Schedule B (page 118), these offices will be within 60 road miles of 99 percent of District 11's population age 65 and over.

To provide service to the rule areas of District 11, Moments will employ one of Hospice Care Consultant by the second year of operations focused on carrying out rural outreach efforts.

The Applicant will demonstrate compliance with this condition by submitting to AHCA a signed declaration showing the physical addresses of the office and the hiring dates for the rural Hospice Care Consultants.

8. Mobile Education Unit

There is a lack of hospice outreach and education in District 11, particularly to the Hispanic, Black, and Jewish communities.

Enhanced outreach and education to residents of District 11 will be important for increasing hospice utilization. Moments conditions this application on dispatching a mobile education vehicle during the first year of operation. As explained in Schedule B (page 73), Moments successfully uses an education trailer for outreach in areas where Moments Hospice currently operates. Moments will solicit input from the advisory committees on how to how best to design and deploy the education trailer in District 11. The Applicant will demonstrate compliance with this condition by submitting to AHCA a signed declaration with pictures of the trailer and a list of locations where it was deployed.

9. Program to Support District 11's Hispanic Population

a. Bilingual Staff

The primary language of many District 11 residents in Spanish. To increase these residents' use of hospice services, Moments conditions this application on having bilingual staff available at all times to assist in all aspects of care, from intake to discharge. The Applicant will demonstrate compliance with this condition by submitting to AHCA a signed declaratory statement describing the bilingual staff as part of the annual conditions compliance report.

Part of the bilingual staff will be full-time bilingual nurse practitioner who will provide hospice education and outreach, palliative care education, and information on advanced care planning. This nurse practitioner will utilize easy-to-understand publications in Spanish, such as *The Five Wishes*.

b. Bilingual Volunteers

Moments conditions this application on at least 50 percent of its hospice volunteers being bilingual. This will increase the number of patients paired with volunteers who speak their preferred or primary language.

c. South Florida Hispanic Chamber of Commerce Membership

Moments has joined the South Florida Hispanic Chamber of Commerce and is developing relationships with the organization's leaders. Moments conditions this application on continuing its membership in the South Florida Hispanic Chamber of Commerce or a similar organization. This will deepen Moments' relationship with the Hispanic Community in its efforts to increase hospice utilization and

improve end-of-life care. The Applicant will demonstrate compliance with this condition by submitting to AHCA a proof of membership, as part of the annual conditions compliance report.

d. Financial Commitment to Liga Contra El Cancer

Moments conditions its application on providing financial assistance to Liga Contra El Cancer, a Miami-based organization whose mission is to serve local cancer patients who lack the financial means to cover the costs of their treatment. The League provides services from case review and social services to surgery, radiation therapy, chemotherapy, laboratory services and radiology, medication, prosthetics, home nursing and nurses' aide services, home medical equipment, transportation, and moral support to patients and their families. Moments conditions this application on donating \$10,000 to the Liga Contra El Cancer organization or one with a similar mission in the region during each of Moments' first two years of operation. The Applicant will demonstrate compliance with this condition by providing AHCA with a copy of the check as part of the annual conditions compliance report.

10. Clinic Liaison Program

Many Medicare beneficiaries in District 11 receive medical care primarily through community clinics. Many of these clinics are open seven days a week and provide patient transportation, bilingual clinical staff, and on-site pharmacies. Many patients receive all of their routine care through these clinics. Through conversations with area providers, Moments has identified these clinics as excellent venues for patient, family, and provider education on hospice care. Moments conditions this application on having a full-time equivalent hospice care consultant dedicated to working with the community clinics in Miami-Dade. The Applicant will demonstrate compliance with this condition by submitting to AHCA, as part of the annual conditions compliant report, a signed declaration with the date of hire and a list of all clinics the hospice care consultant visits each year.

Moments conditions this application on holding hospice education events for clinic staff, patients, and families quarterly during the first two years of operation. The Applicant will demonstrate compliance with this condition by documenting the educational event agendas, dates, and attendees as part of the annual conditions compliance report.

11. National Institute for Jewish Hospice

Some hospice-eligible members of District 11's Jewish Community do not receive hospice care because of religious beliefs. Through the Open Access Program and outreach activities, Moments plans to increase utilization in the Jewish community and District 11. As part of the outreach effort, Moments conditions this application on joining the National Institute for Jewish Hospice organization within the first year of operations. The Applicant will demonstrate compliance with conditions with this condition by submitting a proof of membership to the AHCA, as part of the annual conditions compliance report. The Applicant will also provide proof of admitting Jewish patients who decline to sign a DNR.

12. LGBTQIA+ Inclusion Program

There is a growing need for hospice care in the elderly LGBTQIA+ community in District 11. As members of the community age, many find themselves alone with no spouse or children to care for them or guide them through decision-making processes related to advance care planning. To address this growing need, Moments will introduce the LGBTQIA plus inclusion program as detailed in Schedule B (page 141).

As part of its LGBTQIA+ Inclusion Program, Moments Hospice conditions this application on obtaining SAGE Care Platinum Level Certification during the first two years of operations. SAGE is a highly trusted national organization dedicated to improving the lives of LGBTQIA+ elders. The SAGE Care Platinum Level Certification will demonstrate Moments is of open minds, pioneering hearts, brave spirits, healing presence, and shows that not only are all welcome, but they will be provided with dignified and highly-specialized care. The SAGE Care Platinum Level Certification will ensure Moments' staff are knowledgeable and trained on sensitivities pertaining to the LGBTQIA+ community. The Applicant will demonstrate compliance with this condition by submitting the SAGE credential to AHCA.

13. Assisted Living Facility (ALF) Outreach

Moments Hospice has successfully partnered with many assisted living facilities in its current service areas. Training will provide hospice staff the information they need to be better equipped to meet ALF residents' needs and partner with ALF staff. Moments conditions this application on having all its staff complete ALF

training within the first year of operations. The Applicant will demonstrate compliance with this condition by providing AHCA with the date the staff members received training, as part of the annual conditions compliance report. Moments further conditions this application to provide education to ALF staff on hospice services in collaboration between the ALF and hospice. Moments will provide at least three trainings to ALF staff in its first year of operations and will monitor compliance with this condition through the annual conditions compliance report submitted to AHCA. The report will contain dates and locations of trainings provided to staff of both Moments Miami and ALF.

14. Hospice Services to District 11's Homeless Residents

A substantial population of individuals within district 11 experience homelessness. The lack of housing presents challenges to the delivery of hospice services. Moments Hospice believes that everyone deserves to die with dignity, and conditions this application on providing outreach to residents of District 11 experiencing homelessness through the programs listed below.

- a. Moments will provide free hospice care to uninsured individuals experiencing homelessness as part of its charity care commitment so that all hospice-eligible members of District 11 can experience dignity at the end of their lives. The Applicant will document compliance with this condition by submitting a report to AHCA as part of the annual conditions compliance report.
- b. Donations to Area Homeless Organization: The Catholic Charities of the Archdiocese of Miami have developed programs that serve the area's homeless residents. Moments conditions this application on donating \$10,000 to the Catholic Charities of the Archdiocese of Miami or an organization with similar mission in the region during each of its first two years of operation. The Applicant will demonstrate compliance with this condition by providing AHCA with a copy of the check as part of the annual conditions compliance report.
- c. Housing Assistance: Moments will also donate \$10,000 during each of its first two years of operations to The Catholic Charities of the Archdiocese of Miami's homeless prevention and rapid re-housing project, or another similar organization, to provide housing for District 11 homeless residents who are receiving or need to receive hospice care.

The Applicant will demonstrate compliance with this condition by providing AHCA with a copy of the check as part of the annual conditions compliance report.

- d. Offering advanced care planning and education to those experiencing homelessness. As mentioned in condition number 9a, Moments will hire a full-time bilingual nurse practitioner to provide information on advanced care planning and provide education and information on palliative care and hospice. This person will conduct quarterly advanced care planning training for the staff and residents at homeless shelters in District 11 during the first two years of operations. Easy-to-understand advanced care planning tools such as *The Five Wishes* will be used to assist in choosing end-of-life options. The Applicant will demonstrate compliance with this condition by submitting flyers about these sessions to AHCA as part of the annual conditions compliance report.

15. We Honor Veterans

District 11 is home to many elderly veterans who would benefit from specialized hospice programming. In its existing hospices, Moments participates in We Honor Veterans and believes the program adds value to veterans' experience of hospice care. Moments conditions this application on implementing the We Honor Veterans program and District 11 upon commencement of operations. Moments Miami will attain level 4 certification during the first two years of operations. The Applicant will demonstrate compliance with this condition by documenting that Moments has earned We Honor Veterans level 4 status in the annual conditions compliance report.

16. Partnership with Children's Bereavement Center

Moments will donate \$10,000 during its first year of operations to Children's Bereavement Center to support its existing bereavement services and groups in south Florida. This donation may support bereavement groups or community support in response to events that have been traumatic to the community and have caused widespread grief. The Applicant will demonstrate compliance with this condition by providing AHCA with a signed declaration showing the status of the community bereavement programs and by submitting examples of the flyers promoting the program.

17. Rapid CHAP Accreditation and Medicaid Program

Additional hospice services in District 11 should begin to improve the hospice utilization rate quickly. Moments has experience obtaining CHAP (Community Health Accreditation Partner) accreditation quickly for its new hospice programs. Moments conditions this application on notifying CHAP it is ready for its certification survey within 30 days of initiating service. The Applicant will demonstrate compliance with this condition by submitting to AHCA a signed declaration and copy of the letter to CHAP, as part of the annual conditions compliance report.

Moments will use Strategic Health Programs (SHP) to provide hospice staff HQRP Analysis and CAHPS Scores and Benchmarks reports that summarize quality indicators from the Hospice Item Set (HIS) to educate clinicians on quality and engage employees in the QAPI program. The Applicant will demonstrate compliance with this condition by providing AHCA with an example of the SHP HQRP Analysis and CAHPS Scores and Benchmarks reports in the annual conditions compliance report.

Moments conditions this application on participation in Florida's Medicaid program. Moments will apply for participation Florida's Medicaid program within 45 days of receiving Medicare certification. The Applicant will demonstrate compliance with this condition by providing a copy of Moments' dated application to the Florida Medicaid program as part of the annual conditions compliant compliance report.

18. Obtain CHAP Palliative Care Accreditation

There is a need in District 11 for palliative care for people who either not eligible or not ready for hospice. Moments uses counseling techniques such as Power of Feeling Heard and advanced care planning tools such as *The Five Wishes* as part of providing palliative care. Moments will also offer palliative chemotherapy, TPN, and palliative radiation therapy to appropriate patients to achieve optimal pain and symptom management.

Besides these services, Moments conditions this application on obtaining the new CHAP certification for palliative care during the first two years of operations. The CHAP Palliative Care standards were developed by providers of palliative care and the National Consensus Project for Quality Palliative Care. CHAP accreditation addresses the physical, emotional, social, and spiritual needs of

the patients and their families and facilitates access to information and choice. The Applicant will demonstrate compliance to this condition by submitting documentation of CHAP accreditation to AHCA.

19. Staff Education & Training

Hospice staff are the key to providing patients and their families high-quality care. Moments will ensure its staff in District 11 are well trained to provide the best possible care. Moments conditions this application on these elements:

- a. Moments will pay for hospice staff to obtain and maintain Hospice and Palliative Care certification.
- b. All employed chaplains will have a Master of Divinity or equivalent graduate degree from an accredited seminary or theological school.
- c. Death Doula training, as discussed in schedule B (page 61), will begin during the first year of operations.
- d. Moments will offer Reiki Training to staff and volunteers to enable them to provide Reiki to patients as an additional benefit. This training will begin during the first year of operations.

The Applicant will demonstrate compliance by keeping lists of relevant staff showing their qualifications, and by keeping lists showing certification dates for staff who obtained the Hospice and Palliative Care certification. The Applicant will submit this information as part of the annual conditions compliance report.

20. Compliance Hotline

As detailed in Schedule B (page 81), Moments Hospice contracts with Ethical Advocate to provide 24-hour, everyday access for ethical and compliance concerns to be anonymously reported. Moments will provide a compliance hotline to all Moments Miami Hospice staff at commencement of operations. The Applicant will demonstrate compliance with this condition by submitting to AHCA, as part of the annual conditions compliance report, a signed declaration confirming the availability of the compliance hotline.

21. High-Quality Care through Staffing, Responsiveness, and Dedicated Quality of Life Funds for Patients and Families

District 11 has a need for high-quality hospice care. Based on Moments' experience, the quality of hospice care is improved through responsiveness, increased visit frequency, and reducing patients' financial worries. Therefore, Moments commits to these conditions to improve hospice care in District 11:

- a. Moments conditions this application on assessing all admissions within 15 minutes of referral and starting the admission process within 90 minutes of referral, subject to the patient's physician's cooperation. When a patient or family decides to use hospice, it may be one of the hardest days of their lives. Moments treats every single admission as urgent out of respect for the decision the patient and/or family has had to make related to a terminal illness. This will expedite admission to hospice, subject to receiving the physician order and the patient and/or family being prepared to meet to initiate the hospice benefit. This condition will be measured by a signed declaration submitted by the Applicant to AHCA.
- b. Moments conditions this application on providing at least five CNA visits per week on average, provided this is acceptable to the IDG, the patient, and the patient's family. The Applicant will demonstrate compliance with this condition by submitting assigned declaratory statement to AHCA.
- c. Moments conditions this application on providing at least three nursing visits per week on average, provided this is acceptable to the IDG, the patient, and the patient's family. The Applicant will demonstrate compliance with this condition by submitting assigned declaratory statement to AHCA.
- d. Moments conditions this application on committing a minimum annual budget of \$7,500 for the provision of end-of-life funds for hospice patients and families. Providing financial assistance for items to ensure a safe environment can help ease stress and worry for hospice patients and families. These funds are designated to assist with financial stresses and will assist in providing a safe

environment for patients or in providing satisfying end-of-life experiences. The Applicant will demonstrate compliance with this condition by submitting a signed declaratory statement to AHCA.

- e. Moments conditions this application donating \$25,000 per year to the Moments Hospice Foundation to fund wish fulfillment and veterans programs. This money will be used only in District 11. The Applicant will demonstrate compliance with this condition by providing AHCA with a copy of the checks an information on how the money was used.

22. Programs and Services beyond Standard Hospice Benefit

Moments Hospice focuses on providing individualized plans of care that meet the needs of individual of each unique patient. Each patient's plan of care is created with that specific patient in mind to meet specific needs and goals for care. Moments Hospice offers patients, families, and the community many services that exceed what other hospice organizations provide.

Moments conditions the application of providing the following in District 11:

- 24-hour triage call staffed by Moments Hospice direct employees with video capability, as detailed in Schedule B (page 58). The Applicant will demonstrate compliance with this condition by submitting a progress report of the program as part of the annual conditions compliance report.
- Telehealth Services, as detailed in Schedule B (page 38). These services allow for additional and impromptu visits via audiovisual technology. Moments provides devices to patients, as appropriate, to allow them to connect with providers, caregivers, and family members. The Applicant will demonstrate compliance with this condition by submitting a progress report of the program as part of the annual conditions compliance report.
- Providing internships to students in District 11. Compliance with this condition will be documented by a list of the interns, the schools they attend, and the degree programs, and the length of their internships with Moments. The

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Applicant will demonstrate compliance with this condition by including a report stating these items are in the annual conditions compliance report.

- Comprehensive bereavement services, including individual and group counseling for 13 months and up to 24 months, upon identified need or request. The Applicant will demonstrate compliance with his condition by documenting the number of individuals receiving bereavement services over 13 months after the death of a family member, as part of each annual conditions compliance report.
- Moments will improve patients' quality of life by offering these non-core services. The Applicant will document compliance with this condition as part of the annual conditions compliance report by attesting each was offered throughout the previous calendar year.
 - Virtual Reality: This program improves patients' lives by providing virtual experiences with a real life feel of places and experiences that they have had or dreamed of having. Moments Hospice staff and volunteers will be trained on equipment use and program administration. Training includes proper setup of headsets, software program demonstrations, scientific theory, and proper hygiene according to Moments Hospice equipment disinfection guidelines.
 - Legacy Projects allows patients to create physical items so that they can leave something special for their loved ones.
 - Namaste Care was developed for patients with dementia and is centered on providing unhurried care in a calming environment. Namaste Care will also employ aromatherapy and Reiki to provide a calming effect and help palliate symptoms such as dyspnea, anxiety, and pain.
 - Music Therapy enhances patients' lives by using music as a therapeutic intervention. Music therapy is available to both patients and their families and may be requested through any Moments Hospice staff member.

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- Pet Therapy: Moments Hospice volunteers bring certified animals to visit hospice patients to make them smile, share unconditional love, and bring calm to an often stressful time.
- Massage Therapy: Licensed massage therapist provide an array of massage techniques tailored to each patient's needs.

23. Enterprise Fleet Car Lease Program

District 11 covers a large geographic area. Having reliable transportation is vital to performing hospice visits but may be a struggle for some clinicians. Moments Hospice will provide car leases to qualifying staff members who otherwise could not work in hospice due to transportation difficulties. Removing this barrier will increase the number of qualified applicants and the diversity of Moments' IDG team members. Moments conditions this application on initiating the Enterprise Car Lease Program upon commencement of operations. The Applicant will demonstrate compliance with this condition by submitting a signed declaration to AHCA as part of the annual conditions compliance report.

24. Annual Food Drives

As discussed in Schedule B (page 75), Moments has seen the benefits of food drives for community members in areas it now serves. Food insecurity is a substantial problem in District 11. Moments conditions this application on conducting an annual food drive in District 11 similar to what it does in its current markets. The Applicant will demonstrate compliance with this condition by submitting to AHCA a sign declaratory statement confirming the status of the annual food drive.

25. Miami Dade Chamber of Commerce Membership

Moments has joined the Miami Dade Chamber of Commerce and is developing relationships with the organization's leaders. Moments conditions this application on continuing its membership in the Miami Dade Chamber of Commerce or a similar organization. This will deepen Moments' relationships in the Black Community in its efforts to increase hospice utilization and improve end of life care. Compliance with this condition will be measured by a proof of membership submitted by the Applicant to AHCA in the annual conditions report.

26. Applicant Will Not Solicit Donations

Moments will not solicit charitable donations charitable contributions relating to its services in District 11 from patients, family, or friends, or engaged in fundraising events for its program. Any unsolicited donations received will be given to Moments Hospice Foundation, a non-profit organization that uses funds to provide donations and grants to local organizations and families, ensuring that any money received in District 11 goes back into the local community. Compliance will be provided in the annual conditions compliance report via an attestation and submission of a compliance report with a ledger showing any unsolicited amounts received and corresponding amounts provided to Moments Hospice Foundation. The Applicant will demonstrate compliance with this condition by submitting a signed declaration to AHCA.

27. Moments Employee to Manager and Monitor Condition Compliance

Moments recognizes this application is conditioned on many special programs, trainings, educational events, and operational offerings. Moments is sincere in its dedication to complying with all these conditions and District 11 and believes they will improve hospice utilization and quality in District 11. Therefore, Moments has conditioned this application on hiring a full-time employee to manage, monitor, and report on the conditions of this Application. The Applicant will demonstrate compliance with this condition by including a signed declaratory statement with the person's hire date, position title, and name in its annual conditions compliance report.

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, all of 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 co-batched applicants' proposed conditions are as they stated. However, Section 408.043 (3) Florida Statutes prohibits accreditation by any private organization as a requirement for the issuance of a certificate of need or maintenance of a certificate of need, so Joint Commission or any other

similar or comparable private organization accreditation organization will not be cited as a condition to approval. Also, several of these conditions are required hospice services and as such 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 applicable rule criteria within 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 Sections 408.035 and 408.037, 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 Sarah Zimmerman analyzed the application in its entirety with consultation from financial analyst Kimberly Noble 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 F.S., and applicable rules of the State of Florida, 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 24, of the Florida Administrative Register, dated February 5, 2021, need for one hospice program was published in SA 11 for the July 2022 hospice planning horizon. Therefore, the applicants are applying in response to published need.

Service Area 11 is currently served by nine hospice programs. CY 2020 hospice admissions by these providers are shown in the table below:

**Service Area 11 Hospice Admissions
CY 2020**

Hospice Provider	Admissions
Amedisys Hospice f/k/a Compassionate - Miami Dade, LLC	337
Bristol Hospice - Miami Dade, LLC	299
*Catholic Hospice, Inc.	1,164
Chapters Health Hospice f/k/a Hospice of the Florida Keys, Inc.	1
Kindred Hospice	869
*Heartland Hospice Services	406
Opus Care of South Florida	1,174
Seasons Hospice & Palliative Care of Southern Florida, Inc.	2,546
*VITAS Healthcare Corporation of Florida	7,042
Total	13,838

Source: Florida Need Projections for Hospice Programs - July 2022 Hospice Planning Horizon, February 5, 2021.

Note: * Also serves an adjacent service area(s).

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The reviewer notes that Chapters Health Hospice purchased the license for the Hospice of the Florida Keys, which was inactive for almost all of CY 2020. The applicants provide additional argument(s) in support of need for their respective project as described below.

Citadel Healthcare LLC (CON application #10657) maintains that the current need includes a number of underserved areas within the following groups:

1. Hispanics that do not believe in hospice as they have been taught that the family should care for its dying family members;
2. Hispanics who are very devout Catholics and do not believe in hospice as they spiritually believe that they should be seeking “Curative Care” until their dying breadths and not palliative care;
3. African Americans who have traditionally under-utilized hospice care;
4. Indigents including the homeless;
5. Individuals without primary care who do not know how to access the hospice system.
6. Individuals who live in rurally remote areas that are difficult to serve;
7. Individuals who live in smaller ALFs that are difficult and expensive to serve.

Citadel Hospice, LLC proposes to address the common concerns to hospice care by:

- Education of the large Hispanic population to the merits of hospice to more fully serve this population;
- Education of the African American population to the merits of hospice to more fully serve this population;
- Education and assistance to homeless persons and near homeless persons to the merits of hospice to more fully serve this population;
- Contact and interaction with residents and management of smaller ALFs to increase awareness of the merits of hospice to more fully serve this population.

Citadel Hospice, LLC provided excerpts of its letters of support that are included as part of the corroborating evidence for arguments in favor of approving CON application #10657 in Service Area 11. Complete letters are in appendices AAA-ZZZ of this application.

Hispanic Jesuit Leader writes:

“I believe that the highest quality and most adequate care is delivered by local organizations that have a clear understanding of our community. Med-Care is a community based and has a deep understanding of our Miami-Dade community. Having such a foundation allows Med-Care to Develop the needs of the local population, including cultural predispositions of the individuals receiving services, as well as that of their families. This is extremely important when providing services to minority populations such as Hispanic and African American communities.”

Ahron Greenberg, Vice President Helping Hands and Food Co-Op writes

“Free food service a few times a week for the low income and homeless population in our community...I learned about Med-c services and how they care about their patients and treat each one of them like family. They have been in the county for a number of years and thus, have knowledge to be operational in a county, like no others, in Florida. They also provide a vast spectrum of services which in my opinion will undoubtedly improve the continuum’ of care and the end the end of life’ care. I was pleased to learn about their commitment to service with the Homeless population and make that a priority through community outreach and we will be glad to assist them through our organization.”

Orlando Lopez-Fernando Genuine Healthcare with 30,000 recipients writes:

“Company serves very diverse communities, with large Hispanic and Afro-American influences... it is often socially and culturally more difficult for our patients and their caregivers to get accustomed and ultimately embrace the idea of Hospice... difficult transition from a relatively stable health status to Home Health Services, to Hospice Care. The immeasurable importance of this continuum of care can neither be overlooked nor minimized and is very difficult to achieve outside of a reputable and preferably local company.”

Vilma Quintana CEO Pulmonary Physicians writes:

“30 Pulmonologist and Critical Care physicians serving the South Florida community since 2004. Med-Care has been a partner to our organization... Med-Care is a local home-grown community partner that understands the needs of our population and is committed to supporting the members and families of with their Hospice needs. The Hospice component would enhance the coordination of patient care. We know that Med-Care will provide the continuum of care that the members need with transition to Hospice care.”

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Carlos A. de Solo, CEO Caremax Health, Wellness and Fitness (medical group) Miami, Florida writes:

“Our social service department has found that many of the existing hospice providers do not fully understand the African American and Hispanic, Creole, Haitian, and homeless cultural needs during the terminal period.” This failure has led to many African American, Hispanic, Creole, Haitian, and homeless not receiving hospice care when it.”

Jerry Jackson MD of the Monroe County Health Dept writes:

“Many of the current hospice companies don't have the resources to provide all the disciplines of service under one organization. Med-Care is able to provide DME, pharmacy and Home Health as a single resource. Also, Med-care will be able to provide care to Monroe County as the distances have been a challenge for other providers. I have worked with Med-care for Home Health and my Pharmacy needs with superior results in the care they provide.”

Heriberto Fernandez, MD recommends potential medical director:

“I am proud to offer my recommendation to Felipe Gascon, MD to whom I have personally known for more than 20 years. It is without reservation that I recommend him for the position of medical director.”

Jose Mas, C.E.O. of Mas Tec, Inc. (NYSE: MTZ) writes:

“MasTec is a Fortune 500 company with over 20,000 employees... as a lifelong Miamian, I want to make sure it is that first class services are available for those most in need in our community. Med-Care is a well-established company providing home health, DME, Pharmacy, and Diagnostic Services for over 30 years in the South Florida area. They will be able to bring continuous care and compassion to all future Hospice Patients. Their experience, knowledge and understanding of the health care industry allows them to be at to better serve all the community.”

Felix German (VP operations IMC Health) writes:

“I find that many existing hospice providers lack the diversity needed to care for our multi-cultured population. Many of the patients under the care of our medical team are homeless, African American, or Haitian and we find that they are not receiving hospice care when it is most needed. I have worked and trusted Med-Care to service our patients...have the much-needed cultural competency... will be able to provide a smooth transition into this terminal period in the most dignified and relatively pain-free way.”

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Alda Louis Cabanas VP United Healthcare writes:

“Provides Medical Coverage for over 100,000 Medicare Advantage members and with over 5,000 physicians within our plan. We have noticed that hospice care provided for end-of-life care has been a challenge for our Hispanic and African American population in our community to fully engage and comprehend the use of Hospice... I believe that Med-Care understanding our multi-cultural needs I our community for hospice care since the company roots have been here for more than 25 years.”

Cesar Ortiz CEO PrimeHealth writes:

“Our primary care physicians have been working with Med-Care for the last thirty (30) years an almost recently over the last nine years as part of PrimeHealth Physicians, LLC. It is made up of close to 55 primary care providers with 23 locations throughout the area. Our patient base ranges from about 80,000 patients, where 20,000 patients are Medicare. The Medicare elderly population has been very well served with the homebased approached by Med-Care and much more significantly during the pandemic. Our group foresees an expanded collaboration with Med-Care and Citadel that has focused on patient-centered medical and support services.”

Citadel Healthcare LLC is committed to improving service in each of these underserved categories and will take steps necessary to do so including:

1. The development of an outreach program with dedicated person(s) going into the communities listed above and meeting with individuals who would assist in reaching these individuals
2. Education through schools, hospitals, nursing home, its website and social media
3. Meetings at homeless organizations, shelters, county health clinics
4. Marketing to the smaller boarding homes and ALFs in addition to other marketing efforts
5. Meetings with spiritual & community leaders of both the African American & Hispanic communities

The applicant contends (Citadel Healthcare, LLC) “Med-Care Hospice Services’ parent organization has an extensive footprint in Miami-Dade & Monroe and as such has the infrastructure to immediately provide the needed services.”

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Citadel Healthcare, LLC believes that it will reach its goal of 220 patients in year one and 426 patients in year two as a result of developing a vibrant outreach program with the African American and Hispanic communities, including meetings with the leaders of these groups, religious leaders, service organizations caring for the homeless, physicians, nursing homes, ALFs, etc. The applicant contends it has demonstrated its ability to do this as evidenced by support letters.

Citadel Healthcare, LLC goes on to discuss the impact of the projected population growth in SA 11, citing Appendix HH - The Florida Office of Economic and Demographic Research (EDR) which projects that during the period 2020 to 2022 SA 11's total population will increase by 2.4 percent with its Hispanic growth rate increasing more rapidly at 3.6 percent. Citadel notes that the Non-Hispanic White growth rate is shrinking as is the Non-Hispanic black growth rate and while neither of the Non-Hispanic Black or White group are growing significantly, they are aging, which also will contribute which will also contribute to Med-Care Hospice's ability to meet its utilization projections.

**Citadel Healthcare LLC (CON application #10657)
CY 2018 Admissions by Race
Service Area 11 & State**

HOSPICE NAME	ASIAN	BLACK	WHITE	HISPANIC	OTHER	TOTAL
Bristol Hospice-Miami Dade, LLC	2	1	0	75	5	83
Catholic Hospice, Inc.	13	189	824	1,368	137	2,531
Compassionate Miami Dade and the Florida Keys	0	43	105	284	0	432
Heartland Hospice Services	7	124	192	403	192	918
Kindred Hospice (Miami)	3	150	448	840	924	2,365
OpusCare of South Florida	3	103	158	1,284	26	1,574
Seasons Hospice and Palliative Care of So Fl, Inc.	6	58	86	711	968	1,829
VITAS Healthcare Corporation of Florida	71	1,034	5,590	999	226	7,920
Percentage of SA 11 Totals	0.60%	9.6%	41.9%	33.8%	14.0%	100.0%
Percentage of STATE Totals	0.60%	7.7%	68.8%	12.3%	10.6%	100.0%

Source: CON Application #10657 Page 18, Table 6

Citadel Healthcare, LLC reiterates the need to reach the minority Miami-Dade and Monroe Counties populations contending its “true knowledge” of the area and that it “will engage further with community and health leaders to develop the necessary programs to meet the needs of the underserved.” Regarding disease-related underutilization, Citadel cites its condition to specifically develop programs related to pulmonary disease within the African American and homeless communities including educational programs, providing brochures in both English and Spanish with telehealth provided through the call center. Further, will work with soup kitchens and food banks, mission, Miami-Dade and

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Monroe Counties Medical Clinics and small ALFs. Citadel conditions this application to the commitment of \$100,000 to an outreach program to the underserved:

1. African Americans
2. Hispanics
3. Homeless and near homeless
4. Indigents
5. Small ALFs
6. Patients being geographically remote in some of the more rural areas of the district

The applicant forecasts 220 year one and 426 year two admissions. Citadel notes that it has committed to condition the application to have a minimum of two offices in place within six months of inception and notes that it is likely that it will have three to four offices to better serve the district as it grows and matures. The applicant states that it must be recognized that Miami-Dade is:

1. Extremely large with more than 1,898 square miles (As such there are only two counties with more square miles);
2. Is very difficult to drive with near constant congestion;
3. Has non-contiguous areas of poverty needing special attention;
4. Has most of its physicians located near one of its 14 hospitals.

The applicant further discusses its ability to provide continuity of care, additional offices beyond the initial two, and cites a “preceding table”, which was not provided showing the number of employees living in the SA. Citadel indicated these total 2,627 employees or 1,359 FTEs.

Citadel Healthcare, LLC restates its forecast of admissions for the first two years of operations are 220 admissions in year one and 426 admissions in year two. The applicant believes that the projected admissions are achievable due to:

1. The AHCA Hospice projection of an additional 2,510 admissions; Med-Care Hospice, through B&B having an existing home health agency in the service area with the health care infrastructure and individual relationships already in place (Hospitals, Physicians, nursing home, clinics, insurance companies, schools, churches, medical clinics etc.);
2. Med-Care Hospice through B&B having locally experienced executives including hospice executives heading up the program
3. The applicant recognizes underserved patients including Hispanics, African Americans, and homeless and near homeless individuals;
4. The applicant will be creating outreach educational programs to complement those already provided within their community;

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5. The applicant recognizing the significant difference between the end stage pulmonary disease diagnosis for Miami-Dade and Monroe Counties when compared to the statewide average and the willingness to meet the pulmonologist and to educate the public (End Stage Cardiac in End Stage Pulmonary services are more prevalent in African American; populations and District 11 has a far larger population than other AHCA districts).
6. By affiliation with B&B and its existing Home Health Agency, it has developed an extensive network of community leaders, educators and individuals who are expected to support the program;
7. The hospice penetration rate in District 11 is 24th with 27th being the lowest in the State.

Citadel Healthcare, LLC believes that it will reach its projections because of a relationship with the community. Admissions would be expected not only from the community at large but also from Med-Care Home Health and community physicians. There are approximately 9,800 physicians in the community with approximately 4, 000 referring to Med-Care Businesses.

The applicant the discusses the one key component of its' community hospice education being the employment of Hospice Care Consultants (a/k/a business liaisons, marketing personnel, sometimes including the administrator and nursing personnel). Citadel Healthcare, LLC assures that Med-Care Hospice Services' Hospice Care Consultants will accomplish this through a variety of means including:

1. Developing of professional relationships with physicians, discharge planners, social workers, facilities and health care decision makers through on-going education;
2. Providing in services, one-on-one presentations and group meetings designed to educate the community, referral sources, and patients and families regarding Hospice services; and
3. Planning and coordinating public education and communication efforts to increase community outreach.
4. Med-Care Hospice Services staff, including Hospice Care Consultants, will utilize many materials to assist this in accomplishing their community education, outreach and marketing objectives.
5. Med-Care Hospice Services will utilize these same approaches in Miami Dade and Monroe Counties to ensure that there is an increased education and awareness of hospice services.

The applicant cites the Agency's fixed need pool publication for this cycle indicates that the difference between the projected need and the current hospice admissions is 2,510 and concludes that is no reason its

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projected 426 year two admissions (17 percent of 2,510) is have any negative impact on the existing providers. Citadel states it has made an effort to meet with health care providers, social service organizations, religious groups Hispanic and African American leaders, representatives of groups serving the poor and homeless and other groups whose clients/patients utilize or would utilize hospice services and contends that it would be welcomed in SA 11 and would be an ideal candidate to fulfill the need.

Citadel Healthcare, LLC next discusses its range of services stating it will employ disease-focused treatment programs that will address the unique aspects of varying terminal diseases illnesses. Further, care will be coordinated through an interdisciplinary team wherein physicians, hospice aides, nurses, social workers, chaplains and volunteers work together to ensure all the patient's and family's needs are addressed. Specialty services which will include but are not limited to the following:

- Nursing care 24/7
- Hospice physicians
- Pain and symptom management
- Education an assistance so family members can be involved in patient care
- Medical direction for patient care, coordinated between the hospice medical for director and the patients attending physician
- Physical therapy, when appropriate
- Home visits by registered nurses and license practical nurses, to assess, monitor and treat the patient's condition
- Dietary counseling
- Chaplain services for the patients and family members
- Hospice aide to address the patient's personal needs
- Support of trained volunteers to assist the patient and family members with day-to-day tasks
- Counseling assessment and related services were appropriate and/or requested
- Bereavement counseling to guide the patient and family through the grieving process
- Medical supplies and equipment aid in patient care

Citadel states it will honor Veterans by providing a hospice care program that recognizes and responds to the unique needs of the Veteran and his/her family.

The applicant asserts it is committed to providing alternative therapies beyond the core hospice benefit in addition to traditional medical and pharmacological aspects of palliative care it has special programs and partners including massage therapy, music therapy, art or other such

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therapies when needed. Citadel Healthcare, LLC has conditioned its application on the provision of alternative therapies. Examples of such therapies are:

- Pet Therapy
- Tree of Life
- Aromatherapy & Effleurage which is a Swedish massage technique
- Flower arrangements/Floral programs
- Second Wind Dreams or similar program
- Caring Bridge or similar program
- Call Center/on Call Triage Program
- Hospital Avoidance Program
- Veteran Services (Appendix M)

Citadel provides detailed descriptions of therapies it proposes to offer on the application's pages 25 – 28. The applicant reiterates that its project is consistent with the published need and can be accomplished without adverse impact on existing providers. Citadel Healthcare, LLC concludes this discussion by reiterating that it will enhance access to hospice care in the service area.

Continuum Care of Miami Dade LLC (CON application #10658) notes that SA 11 is the “most populous hospice Service Area in Florida,” making its case that it is best fit to receive the CON approval because has a history of successful startup experience in Broward County, contiguous to the north. Continuum argues that it can develop strategies to penetrate underserved and minority populations, provide unique programming initiatives that are well received by patients and referral sources. Further, its service intensity is meaningful and provides patients and families with additional resources not currently available.

Continuum cites it has support letters from 27 of Miami Dade County's 54 community nursing homes. These 27 facilities represent 49 percent of all licensed nursing home beds in the county with nearly 4,100 licensed beds. Continuum Miami states it also received letters of support from affiliates of the co-batched applicants. The applicant's 77 support letters are provided in their entirety in the application's Tab V. A map showing the locations of the Miami-Dade nursing homes is in Volume 1, Tab 2, Page 12 of this application. Continuum's support letters are listed in Volume 1, Tab 2, pages 60-62.

The applicant notes that it received support from at least 16 physicians and five physician extenders. The applicant stresses that with the 16 positions they admit an estimated 10,000 patients to 14 Miami Dade

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county hospitals annually and with this level of support the applicant is confident that it will have sufficient physician referrals to its hospice program once operational.

Continuum Care of Miami Dade also has letters of support from five local hospitals, nine assisted living facilities, South Florida Hospital and Healthcare Association, area home health agencies, religious leaders, Veterans Administration representatives, and current and former elected officials. Below is a list of District 11 nursing homes, with the first 27 being those in support of Continuum’s application.

Miami-Dade County Nursing Homes			
<i>Nursing Homes Which Provided a Continuum Miami Letter of Support</i>			
KEY	NAME	ADDRESS	CITY
1	ARCH PLAZA NURSING & REHABILITATION CENTER	12505 NE 16TH AVE	NORTH MIAMI
2	AVENTURA REHAB AND NURSING CENTER	1800 N E 168TH ST	N MIAMI BEACH
3	CLARIDGE HOUSE NURSING & REHAB CENTER	13900 NE 3RD COURT	NORTH MIAMI
4	FAIR HAVENS CENTER	201 CURTISS PKWY	MIAMI SPRINGS
5	FRANCO NURSING & REHABILITATION CENTER	800 NW 95TH STREET	MIAMI
6	GOLDEN GLADES NURSING AND REHAB CENT	220 SIERRA DRIVE	MIAMI
7	HAMPTON COURT NURSING AND REHAB CENTER	16100 NW 2ND AVE	N MIAMI BEACH
8	HARMONY HEALTH CENTER	9820 N KENDALL DRIVE	MIAMI
9	HIALEAH SHORES NURSING AND REHAB CENTER	8785 NW 32ND AVE	MIAMI
10	JACKSON PLAZA NURSING AND REHAB CENTER	1861 NW 8TH AVENUE	MIAMI
11	KENDALL LAKES HEALTH AND REHAB CENTER	5280 SW 157 AVENUE	MIAMI
12	KRYSTAL BAY NURSING AND REHABILITATION	16650 W DIXIE HWY	N MIAMI BEACH
13	NORTH BEACH REHABILITATION CENTER	2201 NE 170TH ST	N MIAMI BEACH
14	NORTH DADE NURSING AND REHAB CENTER	1255 NE 135TH ST	NORTH MIAMI
15	PALMETTO CARE CENTER	6750 WEST 22ND CT	HIALEAH
16	PALMETTO SUBACUTE CARE CENTER	7600 SW 8TH STREET	MIAMI
17	PINECREST REHABILITATION CENTER	13650 NE 3RD COURT	NORTH MIAMI
18	PINES NURSING HOME	301 NE 141 STREET	MIAMI
19	PONCE PLAZA NURSING & REHABILITATION CENTER	335 SW 12 AVENUE	MIAMI
20	REGENTS PARK AT AVENTURA	18905 NE 25TH AVE	AVENTURA
21	SANDS AT SOUTH BEACH CARE CENTER THE	42 COLLINS AVENUE	MIAMI BEACH
22	SINAI PLAZA NURSING AND REHAB CENTER	201 NE 112TH STREET	MIAMI
23	SOUTH DADE NURSING AND REHAB CENTER	17475 S DIXIE HWY	MIAMI
24	UNITY HEALTH AND REHABILITATION CENTER	1404 NW 22ND ST	MIAMI
25	UNIVERSITY PLAZA REHAB AND NURSING CENTER	724 NW 19TH ST	MIAMI
26	WEST GABLES HEALTH CARE CENTER	2525 SW 75TH AVE	MIAMI
27	RIVERSIDE CARE CENTER	899 NW 4TH ST	MIAMI
All Other Nursing Homes			
1	CORAL GABLES NURSING AND REHAB CENTER	7060 SW 8TH STREET	MIAMI
2	CORAL REEF NURSING & REHABILITATION CENTER	9869 SW 152ND STREET	MIAMI
3	CROSS GARDENS CARE CENTER	190 NE 191ST STREET	MIAMI
4	EAST RIDGE RETIREMENT VILLAGE INC	19225 SW 87TH AVE	CUTLER BAY
5	FLORIDEAN NURSING AND REHABILITATION CENTER	47 NW 32ND PLACE	MIAMI
6	FOUNTAIN MANOR HEALTH & REHABILITATION CENTER	390 NE 135TH ST	NORTH MIAMI
7	HIALEAH NURSING AND REHABILITATION CENTER	190 W 28TH STREET	HIALEAH
8	HOMESTEAD MANOR A PALACE COMMUNITY	1330 NW 1ST AVE	HOMESTEAD
9	JACKSON MEMORIAL LONG TERM CARE CENTER	2500 NW 22ND AVE	MIAMI
10	JACKSON MEMORIAL PERDUE MEDICAL CENTER	19590 OLD CUTLER ROAD	CUTLER RIDGE
11	MIAMI JEWISH HEALTH SYSTEMS INC.	5200 NE 2ND AVENUE	MIAMI
12	MIAMI SHORES NURSING AND REHAB CENTER	9380 NW 7TH AVENUE	MIAMI
13	NSPIRE HEALTHCARE KENDALL	9400 SW 137TH AVENUE	KENDALL
14	NSPIRE HEALTHCARE MIAMI LAKES	5725 NW 186 STREET	HIALEAH
15	NURSING CENTER AT MERCY THE	3671 S MIAMI AVENUE	MIAMI
16	PALACE AT KENDALL NURSING AND REHABILITATION	11215 SW 84TH STREET	MIAMI
17	PALM GARDEN OF AVENTURA	21251 E DIXIE HIGHWAY	N MIAMI BEACH
18	RIVIERA HEALTH RESORT	6901 YUMURI STREET	CORAL GABLES
19	SIGNATURE HEALTHCARE CENTER OF WATERFORD	8333 W OKEECHOBEE ROAD	HIALEAH GARDENS
20	SIGNATURE HEALTHCARE OF BROOKWOOD GARDENS	1990 S CANAL DRIVE	HOMESTEAD
21	ST ANNES NURSING CENTER ST ANNES RESIDENCE	11855 QUAIL ROOST DRIVE	MIAMI
22	SUSANNA WESLEY HEALTH CENTER	5300 W 16TH AVENUE	HIALEAH
23	TREASURE ISLE CARE CENTER	1735 N TREASURE DRIVE	NORTH BAY VILLAGE
24	VI AT AVENTURA	19333 WEST COUNTRY CLUB DR	AVENTURA
25	VICTORIA NURSING & REHABILITATION CENTER INC	955 NW 3RD ST	MIAMI
26	VILLA MARIA NURSING CENTER	1050 NE 125TH STREET	NORTH MIAMI
27	VILLA MARIA WEST SKILLED NURSING FACILITY	8850 NW 122 ST	HIALEAH GARDENS

Source: Continuum Care CON application #10658, Volume I, pages 13, 14 and 60.

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Continuum uses the Agency's Florida Need Projections for Hospice Programs, Florida DOH Office of Vital Statistics and NHA Analysis in the presentation of tables, line graphs & bar graphs to discuss SA 11. The applicant includes this on pages 17 and 18 and 113-117 of CON application #10658, Volume 1, Tab 2 it is as follows:

- Current Utilization and Projected Need for July 2022 Planning Horizon
- Hospice Penetration Rate – CY 2018-2020
- Hospice Penetration Rate July 2022 Planning Horizon
- Net Need Gap – CY 2018-2020

The applicant contends that Hispanic and Black minority groups in Miami-Dade and Monroe Counties are not being served compared to their non-Hispanic and Caucasian counterparts. Continuum asserts there is need to address the non-cancer disease specific programming specifically those with cardiovascular and nervous system diseases and the need for cancer disease specific programming.

Continuum cites the 2025 (BEHR 6/30/20 Publication) that by 2030 70.1 percent of Miami-Dade County's total population will be Hispanic. The applicant references a 2019 literature review published by Margaret L. Rising, JD, MA, BSN, RN, BA in the Journal of Healthcare for the Poor and Underserved titled

Hispanic Hospice Utilization: Integrative Review and Meta-analysis concludes that overall, Hispanics are not using hospice at rates equal to non-Hispanic whites. Specific attributes that may influence hospice enrollment, usually relating to a cultural tendency toward collectivism have been associated with the Hispanic ethnic category. Hispanics are more likely to engage in family decision making on the topic of end-of-life care.

Hispanic cultural traits include the practice of "prognosis secrecy". "The rationale behind prognosis secrecy is that sharing such information with the sharing such information with the patient or particular family members might be burdensome for them or even hasten the patient's death."

The third cultural influence is the meaning of the word "hospice". In Spanish, "hospicio" refers to a place such as an asylum related to poverty and abandonment. According to an article published by Barbara Allan, CEO of SRA research Group, Inc., this word has a negative connotation that sends strong signals that make many Hispanic individuals reject the concept before they have invested any time or effort into learning about it. This, along with the belief that no

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one can take better care of your loved ones as family, at home, leaves the Hispanic family with feelings of abandonment, failure, and guilt-leaving family out of the equation.

Continuum Care contends that employing palliative care as an entry point or bridge to hospice will improve the perception of hospice for Hispanic residents. The tables below show the significant disparity in hospice admissions and resident deaths and the resulting penetration rate to Hispanics/Blacks and non-Hispanics.

SA 11			
Penetration Rates, Hispanic vs "All Others" (Non-Black/Non-Hispanic)			
Calendar Year 2019			
Miami-Dade County	Hispanics	Others	District 11 Total
Hospice Admissions	8,329	5,662	13,991
Resident Deaths	12,986	7,596	20,582
Hospice Penetration Rate	64.1%	74.5%	68.0%
Source: CON application #10657, Volume 1, Tab 2, Page 21			

SA 11			
Penetration Rate Black vs All Others (Non-Black/Non-Hispanic)			
Calendar Year 2019			
Miami-Dade County	Blacks	Others	District 11 Total
Hospice Admissions	1,567	12,424	13,991
Resident Deaths	3,379	17,203	20,582
Hospice Penetration Rate	46.4%	72.2%	68.0%
Source: CON application #10657, Volume 1, Tab 2, Page 22			

The applicant then discusses the research it has on “Black Terminally-Ill Patients Tend to Not Choose Hospice” stating:

1. *African Americans have a deeply rooted distrust of the health care system.* Due to a history of disrespectful and inadequate treatment from a predominantly white medical community, contributes to their decision not to choose hospice.
2. *Lower economic status and resources* play a large part in leaving the minority communities at a disadvantage with less access to health care services.
3. *A greater willingness to spend their resources to stay alive* is shown in a recent study finding that 8/10 African Americans are willing to spend everything they have to stay alive compared with only half of the white counterpart. This trend may be positively correlated with cultural differences as well as socioeconomic disparities.

4. *Lower care satisfaction among family members* who report absent or problematic communication with physicians and a higher tendency for patients to not have written advance care planning documents. The lower satisfaction with end-of-life care earns it a reputation that spreads throughout the African American communities.
5. *End of life care is in disarray.* A national survey revealed that across the country, end-of-care programs did not meet the national staffing recommendations which often result in such services being generally unavailable. This further compound the issue of racial disparity.

The 2020 study published by Katherine Ornstein et al., concludes that Black decedents undergo more intensive treatments at the end-of-life and are less likely to use hospice services relative to white decedents. More sustained efforts must be made to reduce the disparities in end-of-life care through better education and training of health care professionals to promote the discussion of personal values and preferences for the end of life in Black communities.¹

Continuum Care Hospice, LLC served Alameda County, California from 2015 until 2020. During this time, it focused on changing the cultural and racial divide about hospice care in that community. Continuum worked diligently by hiring people that were engrained in the community, working with local Black leaders to educate about hospice. As a result of this program, the percentage of Black admissions to the Continuum Hospice was twice that of other hospice programs serving Alameda Count at that time. Between 2017 and 2019, Black admissions as a percent of total admissions increased by seven percentage points and total non-white admissions increased four percentage points. As a point of reference, 10.4 percent of Alameda County's total population is Black.

¹ *Ornstein KA, Roth DL, Huang J, Levitan EB, Rhodes JD, Fabius CD, Safford MM, Sheehan OC, Evaluation of Racial Disparities in Hospice Use and End-of-Life Treatment Intensity in REGARDS Cohort. JAMA Netw Open. 2020 Aug 3;3(8):e2014639. Doi:10.1001/jamanetworkopen.2020.14639.PMCID:PMC7445597

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Continuum Care Hospice LLC Alameda County Admissions by Race "Oakland Program"			
Percent of Total Admissions			
Year	Black	Non-White	White
CY 2017	11.5%	37.9%	62.1%
CY 2018	14.2%	29.0%	71.0%
CY 2019	18.5%	42.4%	57.6%

Source: CON application #10658, Volume 1, Tab 2, Page 26

Continuum Care’s Oakland Program admissions as a percent of total admissions, (18.5 percent) exceeded the 18.2 percent of deaths in the County identified as Black. Continuum states that through this approach it cultivated a set of tools and practices to address the cultural, health systems and other impediments to hospice care that confront the underserved population. Further, it will modify these mechanisms to best support Miami-Dade and Monroe Counties. Continuum will partner with existing community resources that service the Black community such as churches and community centers, hire African American team members, and employ active members of the local Black community to ensure it remains engrained the end of life needs in this demographic. The applicant has conditioned this CON application on the provision it will implement a minority outreach program.

OLE Health Partnership

Continuum Care states that it partnered with this California based Patient-Centered Medical Home (PCMH) that emphasizes care on the underserved in their region, creating programs surrounding the migrant workers and Hispanic population. Continuum Care Hospice created a team that speaks fluent Spanish, developed all their published material in Spanish and educated the home’s caregivers on disease progression and what they can do to help. Continuum Care of Miami Dade contends it will make the same efforts to enhance hospice utilization amongst the Hispanic demographic in Miami-Dade and Monroe Counties. Continuum notes it has conditioned this CON on the provision it will implement a minority outreach program.

Other Continuum Care Minority Outreach

In Rhode Island, one of Continuum’s key social workers is a board member at Higher Ground International. This is a forward-thinking and culturally grounded inter-generational social service non-governmental organization that advocates and provides programs for West African Immigrants, Refugees and Marginalized Communities in Rhode Island and Rural Villages in Liberia, West Africa. Continuum states it has served Liberian mothers and grandmothers in Rhode Island focusing on

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understanding the hospice services and benefits, advanced care planning and the Medical Orders for Life-Sustaining Treatment (MOLST) forms. Continuum provided training and held meetings with Higher Ground International which provides education to many other minority groups including but not limited to: Cape Verdean, Portuguese, and Filipino communities.

Continuum's community outreach in Rhode Island with the Native American population is described citing its working with the Narragansett tribe. Because of Continuum's participating in the tribe's Narragansett Women's Day program, the tribe has extended contracts to Continuum to provide services to their members. Continuum Care of Miami Dade contends that it will apply similar expertise, awareness of cultural sensitivities and outreach to serve minority populations. Continuum uses the Agency's Florida Need Projections for Hospice Programs, Florida Office of Vital Statistics, Medicare.gov and NHA Analysis in the presentation of tables, line graphs & bar graphs to discuss SA 11. The applicant includes this on pages 29-35 and 113-117 of CON application #10658, Volume 1, Tab 2 it is as follows:

- Current Utilization and Projected Need for July 2022 Planning Horizon, AHCA and NHA Analysis
- 2020 Non-Cancer Hospice Admissions and 2019 Non-Cancer Resident Deaths, Florida Need Projections for Hospice Programs, AHCA and NHA Analysis
- Resident Deaths Five Year Trend 2015 to 2019, Florida Office of Vital Statistics and NHA Analysis
- Resident Deaths by Cause and Age Cohort, Florida Office of Vital Statistics and NHA Analysis
- Crude Death Rate, Ages 65+ Cardiovascular Disease Related Deaths Miami-Dade County vs Florida CY 2019, Florida Office of Vital Statistics and NHA Analysis
- Cardiovascular Related Hospice Penetration Rate SA 11 and Florida CY 2019
- Crude Death Rate, Ages 65+ Nervous System Disease Related Deaths Miami-Dade County vs Florida CY 2019, Florida Office of Vital Statistics and NHA Analysis
- Area Hospital 30-Day Readmission Rates and Continuum Care's Palliative Care Readmission Rate Heart Failure and Total Unplanned Readmissions Medicare.gov, and Continuum Care

Continuum emphasizes its commitment to implement its palliative care program and work collaboratively with health care providers throughout the service area to impact and have a positive outcome to the needs presented on these reports.

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The applicant reiterates its dedication to providing end-of-life care to those with cancer which will enhance the hospice penetration rate amongst this cohort by working with community oncologists, hematologists, and primary care physicians, and community organizations.

Continuum presents their COVID 19 pandemic response in the application's pages 37 - 40, Volume 1, Tab 2.

Unique programs and services

Continuum then speaks of its history and of its founder Samuel Stern mirroring what was said previously under the "Project Summary" portion of this application. It affirms that all "entities are affiliated to one another, through leadership, mission and values and common quality goals." The applicant describes its experience in the State of Florida in Broward County and Sarasota County, stating its mission is carried out by providing "Non-Core Services" as summarized below:

The applicant indicates every new patient is seen at Continuum within two hours of referral, seven days a week. Further, that the two-hour turnaround time is a testament to Continuum's dedication to serving the needs of all hospice-appropriate patients. Continuum asserts that most hospice organizations will tell a caller on Saturday that someone will be out to see the patient Monday.

Continuum Care indicates patients are visited by a home health aide five to seven days per week, which allows them to recognize changes in the patient ahead of the curve, and to be proactive, rather than reactive. Further, this helps to provide outcomes that are more comfortable for the patient and prevent unnecessary hospitalizations as well. Five to seven weekly visits are an enormous benefit for the patient and for facilities where the patients reside, because it helps their staff tailor hospice care and provides education and training for them on special hospice related needs.

Another feature of Continuum's high service intensity is RN visits for every patient twice weekly, daily if the patient is actively passing, to provide symptom management and proper planning. A social worker and chaplain visit at least weekly if the patient and family request it. The social worker and chaplain work vigorously to support the family, so they are adequately prepared.

As a reflection of the commitment to provide a service intense program, Continuum Care conditioned this CON application on the provision it will provide the following minimum core staffing:

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- The applicant will assure each patient has five to seven Home Health Aide visits per week, provided this is acceptable to the IDT, patient, and family.
- The applicant will assure each patient has a minimum of two RN visits per week, provided this is acceptable to the IDT, patient, and family.
- The applicant will seek to respond to all its 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.

Continuum indicates receiving an outpouring of support for CON application #10658 from several hospitals and other health care providers in Miami-Dade and Monroe Counties who are representative of hospitals and health systems, NHs, ALFs, SNF, clinicians, physicians, business, and community leaders. Many of these facilities mention Continuum Care's service intensity as one of the primary reasons for their support of this application. These letters are summarized on page 59 and in entirety under Tab V of this application.

Music Therapy

Continuum Care comments that music therapy is clinical and evidence-based use of music interventions to accomplish individualized goals within a therapeutic relationship by a board-certified music therapist (MT-BC). Further, the following benefits from this therapy are:

- Pain Management
- Anxiety Reduction
- Improving Comfort
- Expression of Emotion (both Verbally and Non-Verbally)
- Increasing Feelings of Meaning & Purpose
- Resolving Family Conflict/Relational Stress
- Processing Grief-Related Feelings and Experiences
- Increasing Self-Esteem/Self-Acceptance
- Increasing Range of Coping Mechanisms
- Enhancing Quality of Life
- Gaining a Sense of Spiritual Support
- Fostering Meaningful Sensory Engagement
- Creating Positive Memories at the End-of-Life

The applicant states virtual reality (VR) program was deployed at Continuum because of the organization's culture and mission to provide non-pharmacological interventions to ease patients and families' experiences. Continuum Care conditions approval of this CON application on the provision that it will offer its VR Program to its patients initiating on the first day of the program's operation. The

reviewer notes that a supporting video, supporting documentation and the letter of support from Kyle Rand, Rendevers Cofounder and CEO found in Volume 1, Tab 5.

Equine Therapy

Continuum Care conditions upon approval of this CON application on the provision that it will offer equine therapy to its patients initiating in the first year of the program's operation. Equine therapy information is in volume two, tab seven of this application.

Veterans Programming

The applicant indicates it will serve and support Veterans through its We Honor Veterans Program; the We Honor Veterans Program is recognized by NHPCO and the DVA. Continuum states it will offer the We Honor Veterans Program once certified. Veteran's program information is in volume three, tab 19 of this application.

Continuum Care requires:

- All patients are assessed during the initial onboarding process for past or present military service.
- Social worker provides information regarding the Veterans program for inclusion in the Plan of Care.
- Volunteers and members of the patient's care team provide information on Veterans programs, provide support and recognize Veterans for their service.

The applicant supplies a lengthy excerpt from a letter by Colonel Joanne S. Martindale, BCC, Chaplain, United States Department of Veterans Affairs & United States Army; the letter in its entirety is found in volume one, tab five of this application. Below is a portion of this letter:

"I am writing today to lend my support for Continuum Care Hospice's application to establish a new hospice program in Service Area 11, Miami-Dade and Monroe Counties, Florida.... With approximately 55,0 Veterans in Miami-Dade and Monroe Counties, it is important to us to have a truly committed partner in end of life care. Based on my knowledge of Continuum Care Hospice and its operators, I strongly recommend the Agency for Health Care Administration award Continuum Care Hospice with the new hospice program in this area. South Florida needs and deserves Continuum to support its Veterans..."

Continuum Palliative Resources

The applicant states that this is an advanced disease management program for patients who are at a maximum therapy level and approximately 24 months from the end-of-life. Continuum Care conditions approval of this CON application on the provision that it will

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offer its Palliative Resources program to its patients initiating within the first six months of receiving its Medicare certification. Continuum Care states that this unique program and service is stated to have the following benefit:

- Improves communication between hospitals, SNFs, primary care physicians and specialists that result in positive outcomes for patients.
- Improvement medication management which would have otherwise led to unplanned emergency room visits and/or re-hospitalizations.
- Ongoing patient and caregiver education on disease progression, alternative medical services available, expectations as disease progresses, how to manage symptoms, knowing when to call the physician.
- Identifying goals of care and decreasing patient and caregiver anxiety by encouraging difficult conversation with patients nearing end-of-life about what they really want.
- Serves as a connection to the community for resources to assist in providing additional services that can aid in transportation, food services, facility placement, spiritual care, amongst others.
- Reduces the patient's propensity to use hospital and/or emergency department as their medical manager and reinforce better options.
- Decreases cost of care as patients near end-of-life. Continuum states that in its most recent data capture, its re-hospitalization rate was only 2.9 percent.

Minority Outreach

Continuum Care indicates that this program particularly stresses the need for improved hospice access in among Black and Hispanic residents. Continuum Care conditions it will implement a minority outreach program for the black and Hispanic population assembling an appropriate care team for assessment and treatment of this population.

Low Income and Homeless Initiatives

Continuum Care will work with the local Miami-Dade and Monroe County homeless shelters to coordinate end of life care and placement for patients as the need arises.

Community Collaboration

Continuum Care will seek to establish a relationship with the Miami Dolphins, Miami Heat, or University of Miami Hurricanes Football Team in Miami-Dade County to further its Foundations' mission.

Commitment to Quality Services

Continuum Care contends each team member is committed to the
contends each team member is committed to the Continuum Care
Hospice Pledge:

- Hospice recognizes dying as a process and so our care provides comfort rather than cure.
- Hospice neither hastens nor postpones death.
- Hospice provides physical, emotional and spiritual care to terminally ill persons and their families.
- Hospice helps the terminally ill person maintain quality of life and helps family members through an extremely stressful time in their lives.

The Interdisciplinary Team (IDT) Approach

- The applicant contends the team will be specially trained in hospice and palliative care so that they have the ability and expertise to efficiently manage symptoms, control pain, and care for psychological, social, emotional, and spiritual needs of every patient.

These team members include:

- Hospice Medical Director
- Patient's Primary Care Physician
- Care Managers (RN/Primary Care Nurse)
- Medical Social Worker
- Spiritual Counselors/Chaplain
- Hospice Aides
- Music Therapists
- Trained Volunteers
- Bereavement Counselors
- And Other Extended Services

Support for the Project

Continuum Care reiterates that a second hospice choice will enable a competing provider to introduce a new approach to end of life care, one such as the applicant is submitting. The applicant cites letters from 27 of the 54 licensed nursing homes support it project. Further, it obtained support from at 16 physicians and five physician extenders and the South Florida Hospital & Healthcare Association. Continuum reiterates its intense service as covered earlier in this application.

The reviewer notes that the applicant lists the support into the following categories:

- Hospitals/ Health Systems & Hospital Organizations- six letters
- Skilled Nursing Facilities (SNFs) – 27 letters
- Assisted Living Facilities (ALFs) – nine letters

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- Physicians, Practitioners, Home Health Agencies, Nurse Registries and Other Healthcare Organizations – 36 letters
- Community Organizations, Business Leaders and Religious Leaders, and Elected Officials – six letters

Continuum Care provided excerpts of its letters of support that are included as part of the corroborating evidence for arguments in favor of approving CON application #10658 in SA 11. Selected excerpts of support letters are located on pages 62 through 164, Volume 1, Tab 2, Schedule 2 in CON application #10658. The reviewer reproduced some of these excerpts and notes the support that is mirrored throughout each letter.

Hospitals/Health Systems & Hospital Organizations

David Wagner, Florida Market Chief Operating Officer, Kindred Hospitals
“I was impressed with this level of service intensity and viewed this as a competitive opportunity for enhancing the quality and service in the district... Many of kindred's patients are bed bound. Continuum’s high technology venue which brings real world experiences to the bedside via virtual reality is a technology I support for our patients. This is currently unavailable from other service providers and a distinguisher for Continuum.”

Sandy Sosa-Guerrero, Ed. D., MBDA-HA, BSN, RN, FACHE, Chief Executive Officer, Larkin Community Hospital, South Miami Campus
“The organization affiliates have proven successful in penetrating minority and underserved population groups through creative programming, education and staffing with appropriate personnel who are able to reach the underserved groups. I have learned that Continuum Care provides extensive education to physicians and wants to become involved in educating our residents who not only rotate at Larkin Hospitals but also in other area hospitals and the federally qualified health centers... This will provide significant access to groups of underserved populations including blacks and Hispanics throughout the Service Area. Additionally, Continuum Care has explained that in addition to physician education, it will implement a palliative care program. Understanding how palliative care fits within the continuum. I know that it will be beneficial within our community as it is an entry point for Hispanics who are not comfortable with the translation of the word ‘hospice.’ Having Continuum participate in palliative care with our hospital residents will be an added benefit for these physicians in their training. Continuum Care also has other unique programs which are designed to prevent and/or minimize hospital readmissions.”

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Skilled Nursing Facilities (SNFs)

Menashe Sapirman, Administrator, Regents Park Aventura - "Continuum Care Hospice has recognized the fact that fact and has put many resources into developing programs that directly affect the quality of lives they touch. These programs include Virtual Reality Therapy, Equine Therapy, and Music Therapy, which are offered to all patients care for by their teams. This can only serve to improve the end-of-life experience for patients and their families.... I was also quite impressed with their service intensity and ability to keep patients in their home, assisted living or skilled nursing facility."

Stacie Woods, Director of Social Services, Claridge House Nursing and Rehabilitation Center - "I am in full support of Continuum Care of Miami-Dade because they offer a service intensity that other hospice programs in our market do not offer and because their unique initiatives will be invaluable for our residents in need of end-of-life care... Furthermore, I'm aware of Continuum Care's culturally competent strategy to address disparities in minority populations, particularly with respect to the Black and Hispanic populations. This strategy will be deployed in Miami-Dade County which will be an invaluable resource, particularly in our location in Miami, where we have high concentration of Black population. If Continuum is successful, I believe it will enhance hospice penetration rates for this minority cohort."

Assisted Living Facilities (ALFs)

Aryeh Soskin, Owner, Courtyard Plaza - "We look forward to working with Continuum Care Hospital and strongly recommend you approve their CON Application to establish a hospice program in Service Area 11, Miami-Dade and Monroe Counties."

Jorge Musa, Owner and Administrator, New Era Community Health Center - "Should Continuum Care of Miami-Dade be awarded the Certificate of Need, we will collaborate with them and to help best serve the end of life needs of residents. I strongly urge you to approve their CON Application..."

Physicians, Practitioners, Home Health Agencies, Nurse Registries and Other Healthcare Organizations

Austin Martinez, MD, Family Medicine at Hialeah Hospital - "Continuum Care Hospice also plans to dedicate an entire team of hospice workers to the underserved, Hispanic and African American populations. This includes educational services to empower them to make choices for their

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own health care providers and help them become fully aware of the benefits that are available to them, including end-of-life care. They will also strive to institute a bilingual and diverse bedside team. This is a service that our community desperately needs. Their specialty programs are certainly not accessible to our community at this time through current providers... I am in support of Continuum Care Hospice's Application and hope that you will grant it. They would be a welcomed addition to Miami-Dade County's health care team."

Manuel Dominguez, MD, Internal Medicine and Gastroenterology -
"Continuum Care Hospice offers a service intensity model unlike any that is currently available as a choice in Miami Dade County... I am in support of Continuum Care Hospice's Application and hope you will grant it..."

Community Organizations, Business Leaders and Religious Leaders,
and Elected Officials

Kyle Rand, Rendever's Cofounder and CEO, Virtual Reality Program
"Through this virtual reality platform, ...These experiences spark conversations, decrease depression and allow new memories this technology in hospice is also quite effective in assisting with symptom management, with non-pharmacological methods, leading to decreased anxiety and depression..."

Senator René Garcia, Miami-Dade Commissioner, District 13 (Reviewer notes that the Senator also provide a letter for Citadel)
"I have learned about Continuum Care's unique approach to addressing minority population and their success of such with the minority community in they have served. I believe Continuum's unique approach to addressing the ethnic and race disparity in hospice utilization will benefit my constituents. Given all the above, I urge the Agency for Health Care Administration to approve Continuum Care Hospice to license and operate a hospice in Service Area 11 (Miami-Dade and Monroe Counties)."

Continuum Care of Miami Dade maintains that its projected admission estimates are reasonable and realistic, estimating a total of 210 admissions in year one and a total of 560 admissions in year two. See the tables below.

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**Continuum Care of Miami Dade LLC
CON application #10658
Projected Admissions Years One and Two**

Year One		Year Two	
Quarter	Admissions	Quarter	Admissions
1	11	5	108
2	48	6	131
3	71	7	150
4	80	8	171
Year One	210	Year Two	560

Source: CON application #10658, Volume 1, Tab 2, Table 1, page 113

**Continuum Care of Miami Dade LLC
CON application #10658
Admissions by Terminal Illness Years One and Two**

Disease	Year One Admissions	Year Two Admission
Cancer	42	112
Cardiac	63	168
Respiratory	32	84
Renal Failure	20	40
HIV/AIDS	10	15
Other	43	85
Total	210	560
Under 65	21	56
Over 65	189	504

Source: CON application #10658, Volume 1, Tab 2, Table 2, page 113 and 114

Moments Hospice of Miami, LLC (CON application #10659) provides the following table to show the over three months (100 days) that its executives spent in SA 11 in 2021 making 321 in-person visits to area health care providers in conducting its need assessment.

Health Care Provider Type	Visits
ALF	261
Clinic	17
Hospital	7
NF	36

Source: Moments Hospice of Miami, Inc. (CON application #10659) Vol. 1, Page 86

Mark Halpert, Chief Operating Officer, Monarch Healthcare Management
 “Moments enjoys a very strong and positive reputation in Minnesota. They are known for their top-level staff, high level of patient care, and willingness to work with more difficult patient cases. Moments has taken many referrals from our facilities that other hospices would not due to high complexity and associated high cost. Given these factors, Moments has become our preferred provider for almost all of our facilities throughout the state...Moments has been very successful in rolling out their Open Access program which essentially means that they will sign on patients who have expensive treatments (as long as Physician endorses use) and who will not sign DNR papers. A large portion of our residents fall into this category due to religious faith or

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general unease. Moments carries out all sorts of engaging education events and targeting advanced care planning to discuss these topics with our staff and our patients. They expand significant efforts in this regard, and it has yielded traffic results in increasing the use of hospice and our facilities.”

Moments comments that it also met with insurance companies, physician office, community leaders, veterans’ organizations, religious organizations, and other community organizations. Moments state that its primary goal of the community outreach meeting was to identify factors explaining the low use rate for hospice service system by the apparent availability of Hospice and SA 11. From these meetings Moments asserts it secured letters supporting its findings regarding the needs of SA 11 and how it would be the best fit for meeting those needs.

Moments provides its support of letters in the application’s Volume II, Attachment 8. The list below has the applicant’s count by categories of its support letters.

Moments Hospice Existing Relationships outside Florida	87
SA 11 SNFs SA ALFs	96
SA 11 Hospitals, Clinics, Physicians, and Other Providers	29
Elected Officials	4
Business/Community Leaders and Community Outreach Organizations	21
Other Letters of Supports	7
Total Letters	244

Source Moments Hospice of Miami, Inc. (CON application #10659) Vol. 1, Page 86

Moments Hospice of Miami, Inc. states it has identified, after conducting needs analysis of SA 11, several populations with unmet needs:

- Residents with a Cause of Death other than Cancer
- Residents in Nursing Homes
- Residents Needing Open access

- Patients without DNR Orders
- Patients with Expensive Medications or Treatments
- Residents with Cultural Barriers to Accessing Hospice: Hispanic, Black and LGBTQIA+ Residents

Moments asserts that it has successfully increased the hospice use rate in the areas it serves and offers that rate increased from 64 percent to 72.9 percent in the Golden Valley, MN markets from 2017 through 2019, providing a table located in volume 1, page 94 to support this. The applicant provides a statement excerpt:

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Albert Miller, Owner, RM Management Assisted Living Facilities

“My facilities have been utilizing Moments Hospice’s agency and our facilities for the last 3 years or so. I’ve watched Moments grow from a small, single office hospice to a large, multi-state operation. I can say that their growth comes as no surprise to me. Their passion and hard work is unparalleled. When they say they will do something, they do it. They work extremely hard to ensure the patients they serve are well taken care of.”

Moments provides analysis using information obtained through AHCA noting that it has the experience necessary to reach non-cancer patients in SA 11, offering a wide variety of high-quality care including the Moments Breathe Program, the Moments Heart Program and, and the Moments Respect Program. The applicant notes that It has a strong track record of reaching non- cancer patients. Moments provides an excerpt from the Co-founder and Chief Executive Officer of Monarch Healthcare Management which (one of the largest skilled nursing homes and assisted living facilities chains in the state of Minnesota, operating over 3000 beds and employs over 4500 health care workers).

Josh Legum Co-founder and Chief Executive Officer of Monarch Healthcare Management

“One thing in particular that I love about Moments Hospice is the many disease specific programs they have for our residents. Caring for residents in nursing facilities such as ours, providers are likely to encounter a range of conditions such as Alzheimer's/dementia, lung conditions, heart conditions, etc. Moments has dedicated clinical programs for all of these conditions (and continues to add as needed) which tremendously enhances the quality of care our patients receive. On top of the dedicated programs, I see Moments Hospice Care providers almost as much as I see my own clinical team! They spend a lot of time with the patient, sometimes every day - and for long periods throughout the day, to ensure that the patient is receiving top of the line care.”

The applicant uses Medicare and AHCA sources to support its proposed unmet need in SA 11 and states that after meeting with area providers they overwhelmingly responded that SA 11 would welcome partnering with Moments. Examples include:

Meg Lopez De Quintana, MSW, Director of Social Services, Signature HealthCARE of Brookwood Gardens

“We need a Hospice that understands the dynamics of Skilled Nursing Facilities and how to partner with us to provide the best joint plan of care for our residents. With Moments Hospice owners having a background in Nursing Homes and Assisted Livings, along with their

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proven track record of working with over 300 facilities currently, I am confident that Moments Hospice would be a great partner in our beloved vent facility.”

Susanmarie Otiniano Administrator, the Floridian Nursing and Rehabilitation Center

“For skilled nursing facility partnerships, Moments has built a great process where they were directly document in our medical record system, which allows our team to work more efficiently, and it creates a better care experience for the patient. This process, along with the other qualities mentioned, makes Moments a model partner for nursing facilities. This is something that we can benefit could benefit from in Miami-Dade County.”

Netanel Myerowitz Administrator, South Dade Nursing and Rehabilitation Center

“As a nursing home administrator, I am very impressed with the programs and patient commitment that Moments has shown in the areas they currently serve, and I am thrilled to learn that they're working on bringing those qualities to our region. I work with hospices frequently and there is certainly room for a high-quality option that offers abundant programs and a more customized and inclusive approach...”

The applicant reiterates that it currently partners with hundreds of SNFs and ALFs throughout its established territories in Minnesota Wisconsin and Iowa to bring high-quality hospice care to facility residents needing extra support and end of end-of-life care. Moments cites that in April of 2021 it was caring for about 285 hospice patients in SNFs and ALFs.

Moments states that after meeting with SA 11 providers, a reoccurring theme was lack of access, especially for patients whose cultural or religious beliefs or need for Open Access, created barriers to care. These are as follows:

- Residents Needing Open access
 - Patients without DNR Orders
 - Patients with Expensive Medications or Treatments

District 11 is home to large Hispanic, Black, and Jewish communities that are not choosing hospice care because they are opposed to signing Do Not Resuscitate (DNR) orders and, in some cases, want to continue receiving interventions such as total parenteral nutrition (TPN) and intravenous fluids (IV). Therefore, Moments commits to admitting patients through the Open Access program discussed and Schedule B of

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this application (page 104), upon commencement of operations. The program will include these elements:

- Accepting eligible hospice patients, regardless of their code status.
- Accepting eligible hospice patients receiving treatments such as IV therapy, palliative blood transfusions, palliative TPN, hi-flow oxygen, etc.
- Evening and Weekend Admissions- On-call staff equipped to admit patients will be available 24 hours a day, seven days a week, 365 days of the year.
- Palliative Care-Open Access includes palliative care to manage patients' pain and symptoms and provide patient and family education on disease management and advanced care planning.

Moments conditions this application on creating the subcommittees listed below during the first year of its operations. Moments will work with each subcommittee to further its understanding of that community's end-of-life needs and to ensure its programming meets those needs. Each subcommittee will be comprised of residents of District 11 and professionals from health clinics, hospitals, and nursing homes in District 11. These include:

- Hispanic Community Subcommittee
- Black Community Subcommittee
- Jewish Community Subcommittee

The following is an excerpt the applicant provides supporting the Open Access program that the applicant currently uses and will implement. Three additional excerpts located in Volume 1, pages 105 and 106, mirror this statement.

Gino Santorio - President and CEO, Mount Sinai Medical Center

“Currently, if patients and families at our hospital in need of hospice do not sign a do not resuscitate or order or discontinue advanced medical treatments, even if those treatments are not curative and are simply meant to relieve pain during the time of the patient time the patient has left, they face limited options for hospice providers that will accept them...When our patients are denied hospice care or forced to make a decision that is uncomfortable and out of line with their beliefs, it causes stress on the patient and family during an already difficult time. Filling the need with a hospice that works with the patient and allows them the benefit from hospice care without signing a do not resuscitate order or halting treatments would be beneficial for our patients... I am hopeful that we will see hospices in our area evolve on these issues and begin to adapt to the needs of patients who are falling through the

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cracks. I know Moments Hospice is doing so, and I commend them on their efforts. District 11 hospice utilization will surely increase if hospices like Moments make Open Access a priority.”

Moments addresses the Jewish cultural differences in end-of-life care to standard practice and commit to addressing and educating on these needs. The reviewer leaves an excerpt from this application noting that three others that mirror this are found in Volume 1, Pages 106 through 110 of this application.

*Jonathan Rubin Diagnostic Radiologist, Baptist Hospital of Miami
President, Agudath Israel of Florida –*

“I am a Doctor at Baptist Hospital in Miami... I am also the President of the Agudath Israel of Florida, a prominent Jewish organization in Florida well known for its advocacy of the Jewish community for a slew of matters, including health care related issues... Through their Open Access program, Moments takes on patients who are full code-unwilling to sign a DNR, stop dialysis or total parenteral nutrition treatment. Moments staff is educated and trained on proper care for these patients. The patients, many times Jewish or Hispanic, have made the choices because of deep seeded religious beliefs or cultural influences. Moments understands that the patients and the families have the right to make these decisions and it is the care provider’s responsibility to respect these decisions and create a solution that works for each individual patient. They understand the hardship that patients and families are going through during the hospice process and they ensure that top quality care is afforded to all, regardless of the situation. That is the care that our residents need and deserve in District 11.”

Marco Jose Lapciuc Former chairman of Jackson Health System

“I am a Colombian-born Orthodox Jew with deep ties in the Jewish and Hispanic communities in District 11...Moments practices a unique philosophy around open access... This practice will be very welcome in the Hispanic and Jewish communities, as many of those community members will avoid signing on to hospice care for that very reason. Trying to force someone with cultural inclinations or deep-rooted religious beliefs to go against their comforts and sign a document they are theoretically opposed to is not an effective strategy. It usually ends with patients and families losing out on the benefits of hospice care and spending their final weeks in a hospital bed. Moments combats these issues by providing education to the community and ultimately respecting their final decision and extending their service to full code patients.”

Moments Hospice of Miami, LLC provides a table in volume 1, page 11 showing the Deaths in CY 202 by Race/ Ethnicity and states that even though Hispanics use rate is higher than that of other races, Hispanics' contribution to the overall hospice admission deficit is the most significant because they make up the largest cohort of deaths. Below is an excerpt from this application that reverberates this.

Mayelin Canizares VP Clinical Integration and Informatics/QI Keralty Hospital of Miami

“We need a Hospice like Moments Hospice in Miami-Dade County that will help educate and work with our Hispanic community. With nearly 71% of the population being Hispanic/Latino, there is a lot of opportunity for education within this community. Miami-Dade needs an industry participant like Moments who is motivated to address the unique challenges of accessing patients and educating the diverse communities.”

Stephen Hunter Johnson, Chair of the Miami-Dade Black Affairs Advisory Board - “I recently spoke with Moments Hospice about their work in hospice. I was told that their plans to expand their service to District 11 and the impact they anticipate on its residents. I'm writing this letter to you to convey my support of Moments Hospice of Miami in this matter. Moments is an impressive organization with ambitious plans to service the residents of our region who are currently underserved. They will work hard to make inroads to the Black community and raise the bar on care. They are a charitable group that values community involvement and has invested back into the communities where they currently serve.

Miami-Dade needs health care participants with those qualities and will benefit greatly from allowing them to enter our community. As the aging population increases in our region, it is more important than ever to invest in the right groups that will do more than establish self-serving companies with no real community relationships. Moments has shown through the tremendous support they have in the existing areas they serve that they are real community participants making real impacts.”

Moments discusses its diversity in its established areas which includes Native Americans, Hmong, Jewish and LGBTQIA+ patients. Moments states it conditions its support to the LGBTQIA community and references its Inclusion Program it discusses on page 141 of this application. Moments provides the following as needs it believes exist in SA11 followed by a chart defining its solutions to provide for these needs:

1. Open Access and District-Wide Access to Care for All District 11 Residents

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2. Residents with Barriers to Hospice due to Cultural or Religious Reasons
3. Residents with a Non-cancer Diagnosis
4. Residents in Nursing Homes and Assisted Living Facilities
 - High-Quality Hospice Provider: In addition to the four specific needs Moments identified in District 11, there is a need for high-quality hospice provider that will offer staffing and programming to meet these specific needs.

Solutions for Open Access and District-Wide Access to Care for All District 11 Residents
Conditions of this application, as numbered on Schedule C: <ul style="list-style-type: none">• Moments will open three offices (7) which will quickly be CHAP accredited and Medicaid certified (17).• To provide service to the rural areas of District 11, Moments will employ one Hospice Care Consultant (7), offer telehealth services (22), and provide car leases to qualifying staff members (23).• Through Open Access, Moments will accept all eligible patients, even those who have chosen to continue expensive medical treatments or will not sign a DNR order (1).• Moments will assist with financial stresses through a minimum annual budget of \$7,500 for the provision of end-of-life funds and a \$25,000 annual donation to Moments Hospice Foundation (21).• Moments will offer free hospice to uninsured homeless, provide education, and donate \$40,000 to homeless support and housing at end of life (14). Moments will commit to charity care of at least 5 percent of admissions (5).• Moments will obtain CHAP Palliative Care Accreditation and offer palliative care for people either not eligible or not ready for hospice (18).

Moments states it chose its office locations where it will have the greatest impact on reaching the underserved residents. The applicant supplies maps showing its proposed locations and its accessibility within 60 miles of the location in volume 1, pages 119 through 122.

The applicant asserts it will be CHAP certified within 30 days of initiating service and will apply for Florida’s Medicaid program within 45 days of receiving Medicare certification.

Moments repeats its information on Open Access as follows:

- Accepting eligible hospice patients, regardless of their code status.
- Accepting eligible hospice patients receiving treatments such as IV therapy, palliative blood transfusions, palliative TPN, hi-flow oxygen, etc.
- Evening and Weekend Admissions- On-call staff equipped to admit patients will be available 24 hours a day, seven days a week, 365 days of the year.
- Palliative Care- Open Access includes palliative care to manage patients’ pain and symptoms and provide patient and family education on disease management and advanced care planning.

Rabbi Warren Kastzl Hospice Chaplain

“I am eager to support Moments Hospice in their application because of their Open Access program...The impact that this program will have on the Hispanic and Jewish population will be game-changing.”

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Moments Hospice of Miami, LLC reiterates the programs discussed in its conditions and throughout this application:

Reducing Patients' Financial Stress
Hospice Services to District 11's Homeless Residents
CHAP Palliative Care Certification
Inclusion and Access Advisory Committee
Outreach Subcommittees
Bilingual Staff Recruitment
Moments Clinic Liaison and Education Program
Cultural Community Connections
Mobile Education Unit
Outreach and Education
We Honor Veterans
Moments Staffing and Rapid Response Times in District 11
Its Specialty Programs
Final Moments and Muse Technology
Moments Bereavement Program in District 11
Staff Education and Training
Virtual Reality Program
Compliance Hotline

2. Agency Rule Criteria and Preferences

a. Rule 59C-1.0355(4)(e) 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:

Each co-batched applicant discusses serving populations believed to be underserved or otherwise in need of target population hospice services.

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

Citadel Healthcare LLC (CON application #10657) notes that the rule methodology indicates that there is a need in the horizon year for 2,510 new hospice patients. Med-Care Hospice Services believes that the magnitude of this projection is indicative that there is no segment of the population that is totally served.

The applicant considers the most underserved components of the population are individuals from the following groups:

1. Homeless and near homeless individuals

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2. Hispanics
3. Catholic Hispanics who are concerned that Hospice care is not consistent with the views of Catholicism
4. Individuals living in the more remote sections of the county
5. Individuals residing in one of the smaller a ALFs
6. African Americans
7. End-stage Cardiac patients Individuals residing in the more remote areas of the district.

Citadel Healthcare LLC reiterates its' condition number four which will to provide both brochures and developed an educational outreach program to the homeless in the county. The applicant elaborates that the Spanish speaking community in service area 11 are largely from Cuba and that more recent individuals have come from Mexico and Central and South America. Table #7 on page 31 shows the area in Miami-Dade that speaks a language other than English at home and how many persons are in each household. The applicant believes that its condition to provide at least 4.5 percent of its care to Medicaid and uncompensated care will help service the Hispanic population with appropriate needs for hospice providing a better chance to access these services.

Citadel states it will provide staff and a volunteer Community Advisory Board to help educate Hispanic Catholic parishes and the community at large on the views of hospice. The applicant describes Miami-Dade and Monroe Counties as being geographically large with numerous remote sections. Further, because Med-Care related companies currently maintain a fleet of vehicles, at least eight physical offices and sufficient staff to provide home health and other services to the entirety of Miami-Dade and Monroe Counties, it will have the benefit of real cost-effectiveness by sharing said network of staff and delivery assets. This will allow it to achieve penetration and service to persons in geographically remote areas of SA 11 that might not otherwise be economically feasible or attractive.

The applicant notes its ability to service smaller ALFs and provides table #8 on page 33 of this application which illustrates the distribution of ALFs by size. Citadel states that the majority of ALFs in the service area have one to nine units, making up 82.80 percent of the total for profit and non-profit population of ALFs in the service area. The applicant notes that this population is not likely to use hospice services rather they end up in a hospital setting if they become extremely ill. Citadel Healthcare LLC is

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committed to making substantial in-roads to this underserved population and cites letters of support from operators of smaller ALFs included in this application.

The applicant goes on to discuss End-Stage Cardiac and Pulmonary patients, stating it understands the importance of technology in preventing or reducing hospitalizations such as telehealth which they currently provide along with other medical entities, and will offer that same platform on to Medi-Care Hospice Services.

The applicant then discusses African Americans within the Miami-Dade population and Monroe Counties. Citadel Healthcare LLC means to target these areas and provide educational opportunities for these residents that will assist these individuals not only in better understanding hospice services but also understanding of the health care system and how to access it. It will assist them with signing up for Medicaid, Medicare or the Affordable Care Act and will be provided the knowledge on how to access those systems. Citadel states its numerous letters from African American and Hispanic community members as well as religious leaders cite “its willingness to provide educational support and work closely with the clergy of the community.”

Table 9 on the application’s page 34 illustrates where African American population resides. In Miami-Dade and Monroe Counties, there is 30.1 percent of the Black or African American population with 15.7 percent living in poverty. This compares to Florida at 16.9 percent with 12.7 percent living in poverty and the United States having 13.4 percent and 10.5 percent living in poverty. Therefore, there is a large percentage of Black or African Americans living in poverty in Miami-Dade and Monroe Counties.

Continuum Care of Miami-Dade LLC (CON application #10658) responds that it will use *The Interdisciplinary Team (IDT) Approach*, in which the applicant contends the team will be specially trained in hospice and palliative care so that they have the ability and expertise to efficiently manage symptoms, control pain, and care for psychological, social, emotional, and spiritual needs of every patient. The IDT will include a Hospice Medical Director, patient’s Primary Care Physician, Care Managers (RN/Primary Care Nurse), Medical Social Worker, Spiritual Counselors/Chaplain, Hospice Aides, Music Therapists, Trained Volunteers, Bereavement Counselors and other extended services.

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The applicant maintains that it will implement an effective Quality Assurance/Utilization Review that utilizes data to assess outcomes. Further, the applicant states it will have the required policies and procedures to assure the highest quality of hospice care. The Continuum Care medical director's role is to provide overall medical direction. They participate frequently at meetings, to discuss the patient's care plan. The medical director will work with the QAPI Committee and assist the program director and IDT on, establishing policies, procedures, and practices. The applicant discusses the roles of Primary Care Nurse, Chaplain and volunteers as previously discussed in this application. Continuum Care offers a sample of bereavement services it will be offering below.

- Help family members understand and move forward in the grief process by facilitating their expression of feelings.
- Help family members utilize healthy coping strategies in the days after a loved one passes.
- Help families' problem-solve around adjustment issues and find a "new normal".
- Facilitate religious/spiritual rituals- contact the family clergy or hospice chaplain.
- Provide guidelines about decision making around burial and funeral services.
- Help the family memorialize their loved one during significant anniversaries and holidays.
- Address social and spiritual concerns.
- Ensure attention to and respect for the ethnicity and cultural background of the families and caregivers.
- Assist survivors in adapting to an environment without the deceased while experiencing a continued and transformed relationship with the deceased.
- Provide information about and facilitate outsourcing to larger group counseling if necessary.
- Provide active listening, compassionate presence, and spiritual, religious, and emotional support.
- Provide a safe space outside the immediate family dynamic where a loved one can share feelings and be heard without judgment.

Continuum Care addresses its dietary plan and states that the patient will receive counseling and support as needed. The applicant states it will provide initial orientation, continuing education and in-service training to its staff via its online education program through Relias Learning. Continuum Care

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requires employees to receive an initial one-hour training addressing the following subject areas:

- Understanding Alzheimer's Disease and Related Disorders
- Characteristics of Alzheimer's Disease and Related Disorders
- Communicating with patients with Alzheimer's Disease or Related Disorders

Three hours of training address the following subject areas as they apply to Alzheimer's Disease and Related Disorders:

- Behavior Management
- Assistance with activities of daily life to promote the patient's independence.
- Activities for patient
- Stress management for the caregiver
- Family issues
- Patient environment and Ethical issues

Continuum Care commits to meeting the needs of all patients and their families in need of hospice services in SA 11. Further, it will contract to provide in-patient services.

Moments Hospice of Miami, LLC (CON application #10659)

states it has identified, after conducting needs analysis of SA 11, several populations with unmet needs:

- Residents with a Cause of Death other than Cancer
- Residents in Nursing Homes
- Residents Needing Open access
- Patients without DNR Orders
- Patients with Expensive Medications or Treatments
- Residents with Cultural Barriers to Accessing Hospice: Hispanic, Black and LGBTQIA+ Residents

Moments contends it will hire a full-time employee to manage, monitor and report on the conditions of this application.

The applicant provides the following chart to summarize its solutions to meet these unmet needs, with condition number references to Schedule C of this application.

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Solutions for Open Access and District-Wide Access to Care for All District 11 Residents
<ul style="list-style-type: none">• Moments will open three offices (7) which will quickly be CHAP accredited and Medicaid certified (17).• To provide service to the rural areas of District 11, Moments will employ one hospice care consultant (7), offer telehealth (22), and provide car leases to qualifying staff members (23).• Through Open Access, Moments will accept all eligible patients, even those who have chosen to continue expensive medical treatments or will not sign a DNR order (1).• Moments will assist with financial stresses through a minimum annual budget of \$7,500 for the provision of end-of-life funds and a \$25,000 annual donation to Moments Hospice Foundation (21).• Moments will offer free hospice to uninsured homeless, provide education, and donate \$40,000 to homeless support and housing at end of life (14) and commits to charity care of at least 5 percent of admissions (5).• Moments will obtain CHAP Palliative Care Accreditation and offer palliative care for people either not eligible or not ready for hospice (18).
Solutions for Residents with Barriers to Hospice due to Cultural or Religious Reasons
<ul style="list-style-type: none">• Moments has created an Inclusion & Access Advisory Committee (IAAC) with subcommittees focused on Hispanic, Black, and Jewish communities (6).• Moments' nurse practitioner and 50 percent of volunteers will be bilingual (9). A bilingual hospice care consultant will be dedicated to working with community clinics (10).• Moments will donate \$20,000 to Liga Contra El Cancer (9) and will be a member of the National Institute for Jewish Hospice (11), the South Florida Hispanic Chamber of Commerce, and the Miami Dade Chamber of Commerce (25).• Moments will introduce the LGBTQIA+ Inclusion Program (12).• Moments will operate a mobile education unit (8).
Solutions for Residents with a Non-Cancer Diagnosis
<ul style="list-style-type: none">• Moments will provide its Heart, Breathe, and Respect programs to hospice patients in District 11 (4).• Moments will provide diagnosis-focused staff, community, and healthcare provider education (4).• A respiratory therapist will be contracted and available upon commencement of hospice operations (4).
Solutions for Residents in Nursing Homes or Assisted Living Facilities
<ul style="list-style-type: none">• Moments has successfully partnered with many assisted living facilities in its current service areas.• Moments will implement the Initial Moments program, which is designed to meet the more complex challenges of facility-based hospice care (2).• Through training, staff will be better equipped to meet ALF residents' needs and partner with ALF staff (13).• Moments will attain We Honor Veterans level 4 certification (15).
Solutions for a High Quality Hospice Provider
<ul style="list-style-type: none">• Moments will provide five CNA visits per week and three nursing visits per week, on average (21), and start the admission process within 90 minutes of referral (21).• Moments will offer a wide array of programs beyond the standard hospice benefit, such as Virtual Reality, Legacy Projects, Namaste Care, Music Therapy, Pet Therapy, and Massage Therapy (22).• By implementing the Final Moments program, Moments will utilize artificial intelligence to identify patients entering their last week of life, increase the frequency of visits, and provide death doulas (3).• Moments will implement a 24-hour nurse triage call line, offer internships for District 11 students, and provide bereavement services for up to 24 months (22).• Moments will partner with the Children's Bereavement Center (16) and host annual food drives (24).• Moments will ensure staff are well trained through education requirements and by offering specialized training (e.g. Reiki, death doula) and paying for Hospice and Palliative Care certifications (19).• Moments will provide a compliance hotline (20).

- (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.**

Citadel Healthcare LLC (CON application #10657) states it is aware of the staffing differences in its current locations compared to those in SA 11. The applicant projects that less than one percent of its total patient days will require in-patient care during the first two years of operation in SA 11. The level of care it is expected to require a total of 0.33 in-patient beds for respite and in-patient care combined with approximately 0.72 inpatient beds for respite and inpatient days of care during the second year of operation. Citadel expects to develop contractual arrangements with nursing homes, local hospitals and local hospices providing in-patient care once the CON is approved. Sample contracts can be found in the Appendices DD and P of this application.

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Depending upon the patient's location the availability of caregivers and the needs of the patient it will determine the most appropriate location for these inpatient services. Citadel will work with nursing homes and hospitals to ensure appropriate access to hospice care for its patients.

Continuum Care of Miami Dade (CON application #10658) will have contractual agreements with Miami-Dade and Monroe County nursing homes and hospitals, as well as other health care providers designed to meet patient needs in Broward County, including inpatient care. The applicant states that by collaborating with hospitals and nursing homes to provide hospice inpatient care, the applicant will fulfill its goal to expand awareness and utilization of hospice. Such contact expands opportunities for learning and helps break down the myths surrounding hospice and end-of-life care. The applicant asserts that by providing inpatient care it also helps the host facility with its staffing levels.

Continuum states that it has been in the Miami-Dade and Monroe County market for months meeting with hospitals, SNFs, ALFs and community and business leaders. The applicant indicates it has informed clinical and administrative leaders of the benefits Continuum will bring to the market and has relayed all the unique features that set it apart from other hospice programs. The applicant contends that because of its unique programming and service intensity, the applicant has been able to garner a wide array of support, including from those facilities with whom intend to contract with them to provide inpatient care component of hospice, if approved.

The applicant indicates the facilities that have already voiced their willingness to work with Continuum if its CON application is approved and lists them here.

Moments Hospice of Miami, LLC (CON application #10659) states it will arrange for inpatient care through contractual arrangements with SA 11 hospitals and nursing homes. The applicant states it has met with many area providers and has letters of support from over 45 skilled nursing and ALF administrators and staff, and several letters of support from area hospitals. The applicant shares that it is confident that it will secure sufficient contracts for inpatient care.

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The applicant offers that it currently contracts beds for inpatient hospice care in the areas it serves in the Midwest and can provide the same care in SA 11. It offers the following excerpt for support and references Attachment 29 for an example inpatient hospice service agreement.

Desiree Sebastian Administrator, East Ridge at Cutler Bay

“...if awarded the certificate of need we are interested in having Moments Hospice have a hospice inpatient unit on our campus...With Moments Hospice owners having a background in Nursing Homes and Assisted Livings, along with their proven track record of working with over 300 facilities currently, I am confident that Moments Hospice would be a great partner in our beloved community. By having a hospice inpatient unit on our campus, this will be a huge help to our residents and families not needing to move off campus during end of life...this would truly help us to allow our residents to age in place.”

- (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.**

Citadel Healthcare LLC (CON application #10657) will serve homeless patients who do not have primary care givers at home including the homeless who have either outlived their families or have families not living within the community and/or the state. The applicant commits to provide care to all individuals who meet the criteria of terminal illness and reside within the service area, regardless of their living status and diagnosis.

The applicant has provided within appendix G a preliminary admissions policy reflecting its community commitment to serve individuals without primary caregivers for as long as safely possible within their residence to assure the patients receive quality care and services. Citadel Healthcare LLC provides that patients that live alone will meet with their hospice nurse, social worker, and chaplain at the time of their intake for the completion of the patient's psychosocial assessment. The applicant will develop methods to determine the support system for patient living alone including their patient has local family members and or close friends who will be available to the patient developing a plan specifically for patients who live alone or in unsafe environments within 48 hours of admission.

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Citadel discusses in detail the general needs of the homeless population stating it will employ an interdisciplinary team that will focus the initial comprehensive assessment on determining the following:

- Patient's emotional status and who he (she) wishes to be part of this process;
- Care options;
- Patient's need for a safer environment and the right to choose a location for care;
- Patient's ability to comply with medication regimens determine if the patient is likely to misuse the pain management options and in and is inclined to sell them;

The issues are all complicated and during an initial assessment it must be determined if the patient being assessed is not actually alone but has a family that is also affected by homelessness.

The applicant has already reached out to the community's main resources for the homeless to determine what resources can be tapped within the community to assisted serving and to assist in serving these individuals, including conversations with clergy, food banks, and soup kitchens organization servicing the homeless. Citadel's nurses, social workers, spiritual counselors, the medical director and trained volunteer support will assure that the environment of care is carefully maintained. The applicant state that the social worker is responsible for making sure the patient recognizes that there are rules related to the shelter and drug abuse will not be tolerated, and for those that do continue to use illicit substances while receiving end-of life-care, they will schedule frequent hospice team visits including the physician for follow up assessment along with the support of the mental health specialist or drug addiction counselor. Citadel indicates its protocol to use long-acting pain medications, dispense small quantities of medications at a time, utilize a lock box to store medication, and if needed, a written pain agreement overseen by the drug addiction counselor which assists in making the patient responsible for management of his or her medications or if he or she loses the privilege of having self-diagnosing pain medication as an option.

Citadel Healthcare LLC is committed to continue to provide any care to the homeless patient admitted to the program, knowing that many of the homeless may ultimately require extra support, they will provide routine respite or inpatient hospice services at facilities contracted to provide these needed residential care

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services. The applicant conveys that, if appropriate, the applicant may choose to provide continuous care nursing in lieu of placement in a contracted facility or in area shelters, as well.

Citadel Healthcare LLC notes that patients with HIV/AIDS is no longer a major component of hospice services as the death rates have fallen significantly in recent years. The 2018 Department of Elderly Affairs hospice report which indicates that AIDS was approximately 0.4percent of the patients in Florida. The applicant maintains that it will provide for any patient who qualifies for hospice services without regard to the patient's diagnosis. Citadel suggests that HIV disease continues to impact certain segments of the population including the homeless, substance abusers, and individuals in or about to be released from correctional facilities. Further, it will reach out to correctional facilities to provide services to inmates. As noted in the prior section, the applicant states it is prepared to assist the homeless and this would be no different.

Citadel restates its plan to initiate two offices—primary and a satellite office in SA 11, with additional satellites to be opened as needed.

Continuum Care of Miami-Dade LLC (CON application #10658)

maintains it is committed to serving all SA 11 patients including those who do not have primary caregivers at home, the homeless and patients with AIDS. Further, it will serve homeless patients in Miami-Dade and Monroe County and will admit patients to its hospice service even if the patient does not have a caregiver at home. The applicant indicates if the patient is not able to care for him/herself and has no caregiver support group, then Continuum may recommend placement in an ALF or SNF, in which the hospice program will be able to provide residential care.

Continuum states that social workers will assist patients without financial resources to obtain residential care in a hospice unit within an ALF or SNF, as determined by their medical condition. Continuum proposes to either establish relationships with area SNFs and ALFs or enter into per diem contracts or developing hospice units, as the need arises. A copy of sample contracts to be used in this effort are included in the Supporting Documents in Volume III's tabs 17 and 18.

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The applicant points out that the intent is to serve all residents of Miami-Dade and Monroe County who elect the hospice benefit and want its hospice services. The applicant notes that in 2019 there were 139 AIDS-related deaths in Miami-Dade and Monroe Counties and reaffirms it is committed to serving those with AIDS.

Moments Hospice of Miami, LLC (CON application #10659)

maintains it is committed to serving all SA 11 patients including those who do not have primary caregivers at home, the homeless and patients with HIV or AIDS. Moments Hospice of Miami will serve these patients through its Open Access program, which it states is about everyone's right to equitable hospice care. Further, a patient's caregiver situation, homelessness, religious beliefs, financial situation, or need for more expensive comfort measures is never a cause for Moments to deny care. The applicant will place homeless patients and patients without caregivers or homes in assisted living facilities or nursing home. Moments will provide care in homeless shelters for patients during the transition or for those who are reluctant to move. *Pro bono* care will be provided to those individuals as needed in their specific situations.

Moments provides a table that shows the homelessness that is experienced in SA 11. This lack of housing presents a challenge for the delivery of hospice services. Moments conditions this application on providing outreach to the homeless residents of SA 11 through the programs listed below:

- Moments will provide free hospice care to uninsured individuals experiencing homelessness as part of its charity care commitment so that all hospice-eligible members of District 11 can experience dignity at the end of their lives.
- Donations to Area Homeless Organization: The Catholic Charities of the Archdiocese of Miami have developed programs that serve the area's homeless residents. Moments conditions this application on donating \$10,000 to the Catholic Charities of the Archdiocese of Miami or an organization with similar mission in the region during each of its first two years of operation.

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- Offering advanced care planning and education to those experiencing homelessness. As mentioned in condition number 9, Moments will hire a full-time bilingual nurse practitioner to provide information on advanced care planning and provide education and information on palliative care and hospice. This person will conduct quarterly advanced care planning training for the staff and residents at homeless shelters in District 11 during the first two years of operations. Easy-to-understand advanced care planning tools such as *The Five Wishes* will be used to assist in choosing end-of-life options.

	Homeless Persons	Count State Rank (of 67)	Population	Rate per 1,000
Miami-Dade	3472	1	2,832,794	1.20
Monroe	437	22	77,823	5.62
District 11	3,909	N/A	2,910,617	1.34
Florida	27,679	N/A	21,596,068	1.28

Source Moments Hospice of Miami, LLC/CON #10659, Vol. 1, page 171

- (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.**

SA 11 is comprised of Miami-Dade and Monroe counties. Therefore, this preference is not applicable.

- (5) Preference shall be given to an applicant who proposes to provide services that are not specifically covered by private insurance, Medicaid, or Medicare.**

Citadel Healthcare LLC (CON application #10657) discusses Medicare and Medicaid approved and unapproved services but says that the applicant will work with community service organizations, clergy, and providers of care to the homeless to determine which services are needed. The applicant will provide care to those people who are not served by traditional entities such as those were too many assets to qualify for Medicaid, based on disability, whose health insurance dropped them when they could no longer work and had little cash to carry them through their health care crisis.

Citadel will provide an Alzheimer's Dementia program to be focused on improving the quality of life and that of the family members of these patients, providing different alternative therapies such as music therapy, aromatherapy, and pet therapy.

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The Bereavement Program will include grief counseling beyond the typical 12 months, specially designed patient and family education materials, home visits by bereavement staff, group activities, memorial gathering, community outreach education programs focused on grief, Family Weekend Bereavement Retreat, telephone grief support, Coping with Grief at the holiday season, and a Children's Bereavement camp.

Citadel will also provide a pet service support program in which volunteers provide support for patients who have lost who have pets by walking, feeding, and caring for the pets in the patient's home or when the patients are placed inpatient. The applicant will work with the Humane Society and local animal shelter volunteers to help find homes for pets of hospice patients that live alone, so that the patients die with the peace and knowledge that their pet will be cared for after their death.

Citadel Healthcare LLC will hire a part time volunteer coordinator two months prior to the hospice opening and increasing it to a full-time position within the first two years of operation. The responsibilities of this individual will be to coordinate the growth of the volunteer program, to provide:

- additional support by providing one on one support for the patient wishing to attend and participate at weddings, family events or even religious services,
- to assist their patient and maintain their routine to the fullest extent possible, and
- to provide calming therapies commonly provided to hospice patients including but not limited to pet therapy, music therapy, aromatherapy and other therapies to provide soothing and a soothing atmosphere for the patient.

The applicant will provide services which become more difficult as the patient becomes increasingly homebound such as providing licensed hairdressers, beauticians and barbers, licensed cosmetologists, and licensed manicurist.

Citadel Healthcare LLC will provide Vigil Volunteer (see also Appendix YY of the application). This program includes volunteers and paid employees who ensure patients who have no local family or friend friends are provided companionship and do not die alone. Further, there are occasions when family members will use the time a volunteer is present just to rest or care for their own health. Vigil Volunteers will receive a comprehensive volunteer training which includes

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- Hospice philosophy,
- Explanation of Hospice eligibility requirements,
- Infection control,
- Patients' Bill of Rights,
- Pain (physical, psychological, spiritual) and symptom management,
- Discussion of the most common disease processes and symptoms associated with each,
- Communication, Death and grief,
- Caregiver, Spiritual and intercultural issues,
- Safety,
- Role of a volunteer and staff members,
- Interaction with each discipline

The applicant indicates it will include a case study review online from each discipline, perspective to be completed as part of training, working with each discipline, assessing the Vigil Volunteers comfort in their role of providing presence, comfort, and reassurance to both patient and/or family. The applicant has conditioned this CON application to include this needed program.

Continuum Care of Miami-Dade LLC (CON application #10658) asserts that it is committed to providing only the highest quality services. The applicant maintains there is a promise to work continuously to provide the patient and family with the very best service, friendliest staff, and most innovative care possible. Continuum maintains that each day team members promise to keep each patient and their family informed and comfortable and promises the most up-to-date technology and the best of each team member's ability.

The applicant indicates that to carry out its mission and commitment, Continuum Care of Miami Dade LLC will offer a host of special programs and services that are not specifically covered by private insurance, Medicaid, or Medicare. The applicant's unique services and programs, along with its distinguishing attributes are summarized in this section of CON application #10658 and will be extended to Miami-Dade and Monroe County residents if approved. Continuum indicates that it will provide the Non-Core Services, described herein, as a condition of the approval of CON application #10658.

The applicant states there are several characteristics of Continuum Programs that distinguish them from the other hospice programs. The applicant maintains that the most

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significant attribute of Continuum is that the staff prides themselves on the intensity of service that far surpasses NHPCO minimum requirements for staffing.

The applicant asserts that as a reflection of the commitment to provide a service intense program, Continuum conditioned this CON application on the provision it will provide the following minimum core staffing:

- The applicant will assure each patient has five to seven HHA visits per week, provided this is acceptable to the IDT, patient, and family.
- The applicant will assure each patient has a minimum of two RN visits per week, provided this is acceptable to the IDT, patient, and family.
- The applicant will seek to respond to all its referrals within one hour, initiate the assessment process within two hours, and expedite admission to the hospice subject to having a physician order and the patient/family selecting the hospice option.

Continuum comments that it offers music therapy and that there is clinical and evidence-based use of music interventions to accomplish individualized goals within a therapeutic relationship by a board-certified music therapist and notes it conditions CON approval on its doing so. Further, its virtual reality (VR) program was deployed at Continuum because of the organization's culture and mission to provide non-pharmacological interventions to ease patients and families' experiences. Continuum Care conditions approval of this CON application on the provision that it will offer its VR Program to its patients initiating on the first day of the program's operation.

Equine therapy - an experiential therapy that combines the power of the human-horse relationship and Gestalt Therapy is another Continuum condition to approval of this CON application. Equine therapy information located in Volume Two, Tab Six of this application.

The applicant indicates it will serve and support Veterans through its We Honor Veterans Program - program information located in Volume III, Tab 19 of this application.

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The applicant indicates that its Minority Outreach program will particularly stresses the need for improved hospice access in Miami-Dade and Monroe Counties among Black and Hispanic residents.

Moments Hospice of Miami, LLC (CON application #10659) contends that it meets this preference and has discussed throughout this application that it provides many services and programs not specifically covered or reimbursed. Moments has conditioned this application on providing these in SA 11. The applicant provides that the unique program offerings are summarized below and under its conditions located in C. Project Summary of this application. Moments states that they enhance the quality of life for those affected by terminal illness, and that these programs, technologies, and, most importantly, Moments Hospice philosophy will benefit the residents of SA 11.

Moments Open Access	Removes barriers to hospice acceptance which may be related to religious, cultural, and other opinions so that patients have ability to comfortably choose hospice when it is right for them
Initial Moments	Focused care during a nursing home or care facility patient's first week of hospice
Final Moments	Longer, more frequent visits during a patient's last week of life
Muse Healthcare Technology	Analyzes hospice data to identify patients nearing their death so Final Moments can be offered
Telehealth Program	Provides virtual visits, 24/7 monitoring, and medication management
Massage Therapy	Soothing and relaxing care provided by licensed massage therapists
Pet Therapy	Provides emotional and social benefits through visits with certified therapy pets
Virtual Reality Program	Enhances patients' lives by providing experiences they have dreamed of having
Namaste Care	Creates a calm environment where all activities and interactions are unhurried, using a loving touch approach
We Honor Veterans	Focuses on respectful inquiry, compassionate listening' and grateful acknowledgment of veterans
Lasting Moments	Individualized projects help patients with life review, closure, or unresolved issues. The physical items created are passed on to loved ones.
Birthdays Program	Moments celebrates every patient's birthday by providing a favorite dessert, a balloon, and a card. Family is encouraged to join the celebration.
Death Doulas	Moments is developing a certification training for volunteers who will provide support and reassurance during a patient's final days.
Diagnosis-Specific Programs	Moments Breathe (pulmonary care), Moments Heart (cardiac care), Moments Respect (dementia care)
Robust Staffing Model	High nurse and hospice aide staffing ratios improve quality of care and reduce response times. Moments is onsite within 90 minutes of an admission request.

Source Moments Hospice of Miami, LLC/CON #10659, Page 174

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:**

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(a) Proposed staffing, including use of volunteers.

Citadel Healthcare LLC CON application #10657 projects a total of 30 volunteers for year one that will increase to 75 by the end of year two. The applicant’s staffing pattern is shown below.

**Staffing Years One and Two
Citadel Healthcare LLC CON application #10657**

Description	FTE's Year One	FTE's Year Two
Projected Admissions	220	426
Administrator	1.0	1.0
Clinical Manger	1.00	1.00
Care Team Asst.	0.50	2.00
Business Development/Sales	1.00	2.00
Manager	0.50	1.00
Medical Director	0.50	1.00
Physicians	Contract	Contract
RN's	5.00	16.50
LPNs		16
Nurse Practitioner	0.50	1.00
CNA, Hospice Aides	4.00	12.50
Therapist (PT, OT, Speech, Other)	Contract	Contract
Bereavement/Volunteer Coordinator	0.50	1.50
Financial Services Representatives	0.50	1.00
Dietician	0.05	0.05
Social Worker	0.75	2.00
Chaplain	0.50	1.00
Other Business Services/Marketing	1.00	2.00
Volunteer Coordinator	0.75	1.00
Total	18.05	46.55

Source CON #10657, Vol. 1, Page 44

Citadel Healthcare LLC affirms that the volunteers will function in two capacities, Administrative and Direct Care and that all volunteers providing direct care will undergo background checks as do employees.

Continuum Care of Miami Dade LLC (CON application #10658): Schedule 6A shows 20.6 FTEs for year one and 69.74 FTEs for year two (ending dates were not specified). The applicant’s staffing pattern is shown below.

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**Continuum Care of Miami Dade, LLC
Projected Staffing Years One and Two**

Position	Year One	Year Two
Administration		
Administrator	1.00	1.00
Hospice Liaison	2.00	3.34
Support Staff	1.25	3.73
Physicians		
Physician	0.25	0.41
Nursing		
Clinical Director	1.00	1.00
RNs	2.59	1.00
LPNs	2.59	11.05
Nurses' Aides	4.32	11.05
Other: On-Call Representative	1.00	18.41
Ancillary		
Physical Therapist	Contracted	Contracted
Speech Therapist	Contracted	Contracted
Occupational Therapist	Contracted	Contracted
Equestrian Therapist	Contracted	Contracted
Music Therapist	1.00	2.21
Social Services		
Social Worker	1.04	4.42
Volunteer/Bereavement Manager	1.00	3.21
Chaplain	1.04	4.42
Grand Total	20.06	69.74

Source: CON application #10658, Schedule 6A

Moments Hospice of Miami, LLC (CON application #10659) notes it will have interdisciplinary teams that create comprehensive plan personalized for each patient. Further, its staff will meet each patient and family's spirituals, health, and physical need needs for a complete Circle of Care (which is further discussed in the application's Volume Two, Attachment 16). Moments Miami will meet all state and federal service and staffing requirements. The applicant contends its robust staffing model and specialized staff training programs, far exceed the minimum and state federal staffing requirements, and are important indicators of Moment's investment and providing high quality hospice care and differentiate them from other hospices. Moments affirms that its triage nurses enable enhanced quality control for patient's needs. Moment's music therapists and massage therapists are all employed or contracted at the start of a Moments program. The applicant states that its staffing is based upon the anticipated nursing direct nursing and care staff to be utilized in the delivery of hospice services and the support staff required in the program.

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The applicant lists non-core services offered by the interdisciplinary team, that it conditions this application include:

- Providing outreach, education, and staff training period Moments budgets for those these programs through Moments employed staff and volunteers throughout the staffing assumptions under multiple positions. Moments Miami will also have a full-time regional director of education and quality, a full-time nurse preceptor/internal educator, and a full-time nurse practitioner.
- Implementing a Death Doula program, Virtual Reality Program, Legacy Projects, Namaste Care, Music Therapy, and Pet Therapy. Moment budgets for these programs through employed staff and volunteers. Volunteers are not paid. Moments has budgeted for a full-time volunteer coordinator to ensure volunteers are available and total volunteer hours meet or exceed Medicare's minimum requirements.
- Employing one FTE Hospice Care Consultant dedicated to clinics who will be the one of the three Hospice Care Consultants in Year one and one of the seven Hospice Care Consultants in Year two.
- Providing service to the rural areas of SA 11. Moments will employee one Hospice Care Consultant by the second year of operation focused on carrying out rural outreach efforts, budgeted as one of the seven Hospice Care Consultants in year two.
- Providing 24-hour triage, budgeted through one FTE triage nurse and on-call RN's.
- Implementing the Moments Breathe Program and contracting with a Respiratory Therapist. As a contracted position, this expense is accounted for in Schedule 8A.
- Providing massage and music therapies, as budgeted through employed therapists.

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Reviewer notes that the Total on the applicant’s narrative chart is not equal to Schedule 6A of CON #10569 total for Year Two, so reviewer has provided both. Also noted, position titles are not identical.

Moments Hospice of Miami, LLC (CON application #10659): Schedule 6A shows 42.29 FTEs for year one and 87.52 FTEs for year two. The applicant’s staffing pattern is shown below.

Position	Year One Ending August 2022	Year Two Ending August 2023
Administration		
Administrator	1.00	0.00
Administrator/Regional Director of Ops.	0.00	1.00
Admissions Director	0.00	1.00
Administrative Assistant	0.00	2.00
Other: See narrative	13.5	22.50
Physicians		
Other: Medical Director	0.65	1.59
Nursing		
RNs	6.00	16.00
CNAs	9.14	22.43
Other: See narrative	5.00	7.00
Ancillary		
Other: See narrative	2.00	4.00
Dietary		
Dietician	1.00	2.00
Social Services		
Social Worker	2.00	4.00
Other: Chaplain	2.00	4.00
Grand Total	42.29	87.52

Source: CON application #10659, Schedule 6A

Moments Hospice of Miami, LLC CON application #10659) states it will make additional staffing resources available and will support the proposed Moments Miami with its fiscal and legal services, specialized accounting functions come in information technology services Moments will also assist in preparing financial statements and filing Medicare cost reports contending that this infrastructure is already in place and will require no incremental expenditure or staff.

Reviewer notes that Moments addresses its staff and volunteer’s roles and duties in detail on pages 177 -182 of this application.

(b) Expected sources of patient referrals.

Citadel Healthcare LLC (CON application #10657) states it will have patient referrals from hospitals, physician offices, home health, nursing homes, patient or patient's family, ALF's, religious, and shelters.

Continuum Care of Miami-Dade LLC (CON application #10658) provides its extensive list of support as referrals sources:

- Nursing homes
- Hospitals
- ALFs
- Health Maintenance Organizations
- Physicians
- Dialysis Centers
- Social Workers
- Home Health Organizations
- Churches
- Funeral Directors
- Social Services Organizations
- Families
- Individuals

Moments Hospice of Miami, LLC (CON application #10659) asserts it expects to have a variety of referral sources, including:

- Nursing home staff
- Hospital discharge planners
- ALF staff
- Connections made through the South Florida Hispanic Chamber of Commerce and the Miami-Dade Chamber of Commerce
- Physicians
- Area Clinics
- Home health agencies
- Synagogues, Churches, and other faith communities
- Family members
- Veterans groups

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- (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.**

Citadel Healthcare LLC CON #10657 provides the following projected number of admissions by payer source for the first two years of operations.

**Citadel Healthcare LLC
CON application#10657 - Admissions by Payer**

#	Payer	Percentage of Admits	Year One	Percentage of Admits	Year Two
1	Medicare	90.5%	199	90.6%	386
2	Medicaid	5.9%	13	5.9%	25
3	Third Party	2.3%	5	2.3%	10
4	Self-Pay	0.5%	1	0.2%	1
5	Uncompensated	0.9%	1	0.9%	4
6	Totals	100%	220	100%	426

Source: CON application #10657, page 46, Table 12

Continuum Care of Miami-Dade LLC (CON application #10658) provides the following projected number of admissions by payer source for the first two years of operations.

**Continuum Care of Miami-Dade LLC
CON application #10658
Year One and Year Two – Admissions by Payer**

Payer	Year One Admits	Year Two Admits
Medicare	193	3
Medicaid	4	515
Charity	7	11
Self-Pay	1	11
Insurance	4	20
Total	210	560

Source: CON application #10658, page 135

Moments Hospice of Miami, LLC (CON application #10659) provides the following projected number of admissions by payer source for the first two years of operations.

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**Moments Hospice of Miami, LLC
CON application #10659
Year One and Year Two – Admissions by Payer**

Payer	Year One Admits	Year Two Admits
Medicare	212	556
Medicaid	18	47
Private Insurance	13	34
Self-Pay	*	*
Charity	16	34
Total	259	671

Source: CON application #10659, page 184

- (d) **Projected number of admissions, by type of terminal illness, for the first two years of operation.**

Citadel Healthcare LLC (CON application #10657) provides the following projected number of admissions by diagnosis for the first two years of operations.

**Citadel Healthcare LLC
CON application #10657
Admissions by Diagnosis Year One and Year Two**

Diagnosis	Year One	Year Two	Year One Percentage	Year Two Percentage
Cancer	66	141	30.0%	33.1%
AIDS	1	2	0.2%	0.2%
End-Stage Pulmonary	24	47	11.1%	11.0%
End Stage Renal	7	14	1.5%	3.3%
End-Stage Heart	39	80	17.9%	18.8%
Diagnosis Other	65	142	39.3%	33.3%
Totals all Diagnoses	220	426	100%	100%

Source: CON application #10657, page 47, Table 13

Continuum Care of Miami-Dade LLC (CON application #10658) provides the following projected number of admissions by diagnosis for the first two years of operations.

**Continuum Care of Miami-Dade LLC
CON application #10658
Admissions by Diagnosis Year One and Year Two**

Disease	Year One	Year Two
Cancer	42	112
Cardiac	63	168
Respiratory	32	84
Renal Failure	20	40
HIV/AIDS	10	15
Other	43	85
Totals all Diagnoses	210	560

Source: CON application #10658, page 135

CON Action Numbers: 10657, 10658 & 10659

Moments Hospice of Miami, LLC (CON application #10659) provides the following projected number of admissions by diagnosis (disease) for the first two years of operations.

**Moments Hospice of Miami, LLC
CON application #10659
Admissions by Diagnosis Year One and Year Two**

Diagnosis	Year One	Year Two
Alzheimer’s (Moments Respect Program)	30	77
Cardiac (Moments Heart Program)	42	108
Respiratory (Moments Breathe Program)	18	46
Cerebrovascular Disease/Stroke	55	141
Cancer	64	167
All Others	50	132
Total	259	671

Source: CON application #10659, page 213

- (e) **Projected number of admissions, by two age groups, under 65 and 65 or older, for the first two years of operation.**

Citadel Healthcare LLC (CON application #10657) provides the following projected number of admissions by age cohort (under 65 and 65+) and by terminal illness (cancer and “other”) for the first two years of operations.

**Citadel Healthcare LLC
CON application #10657 -Admissions by Age**

Admit by Age	Projected Percentage by Age	Year One	Year Two
0-64	14%	31	60
65 & Older	86%	189	366
Totals	100.0%	220	426

Source: CON application #10657, page 46, Table 14

Continuum Care of Miami-Dade LLC (CON application #10658) provides the following projected number of admissions by age cohort (under 65 and 65+) and by terminal illness (cancer and “other”) for the first two years of operations.

**Continuum Care of Miami-Dade LLC
CON application #10658 - Admissions by Age**

Admit by Age	Year One	Year Two
Under 65	21	56
65 and Older	189	504
Total	210	560

Source: CON application #10658, page 135

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Moments Hospice of Miami, LLC (CON application #10659) provides the following projected number of admissions by age cohort (under 65 and 65+) and by terminal illness (cancer and “other”) for the first two years of operations.

**Moments Hospice of Miami, LLC
CON application #10659 - Admissions by Age Group**

Age Group	Year One	Year Two
Under 65	25	65
65 and Older	234	606
Total	259	671

Source: CON application #10659, page 213

(f) Identification of the services that will be provided directly by hospice staff and volunteers and those that will be provided through contractual arrangements.

Citadel Healthcare LLC (CON application #10657)

provides the following core services: Physician services, Nursing services, Social Work services, Pastoral or counseling services, Dietary services, home health aide services, and Bereavement counseling services. The applicant declares it will hire full time, part time or PRN staff paid by the hospice including: Administrator, Director of Clinical Services, Chaplain, (spiritual Counselor), Social Worker, Hospice Liaison Marketing, Office Manager Clerical Staff, Billing Clerk, Bereavement Counselor, Medical Director, Other Physicians (Contract), Continuous Care-RNs, LPNs, HHAs, Hospice Liaison Pt Care, PT/OT/ST (Contract), Alternative Integrative Therapies(Contract), RN’s Hospice Aides,/Homemakers, Volunteer Coordinator, Volunteers, Dietary Counselor (Contract), and FNP (Contract).

Continuum Care of Miami-Dade LLC (CON application #10658)

maintains that staff and volunteers will directly provide all core services, including physician services, nursing services, social work services, pastoral/counseling, dietary counseling and music therapy. Continuum will contract for and purchase certain services as needed by the patients. These services include durable medical equipment, medical supplies, pharmaceuticals, physical therapy, speech therapy and occupational therapy.

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The applicant indicates that non-core services including music therapy and virtual reality will be provided by Continuum staff and will not be a contract service. The applicant states that equine therapy will be provided by a therapist at the contracted stable.

Moments Hospice of Miami, LLC (CON application #10659) states that all hospice services will be provided by Moments Miami staff and volunteers, except for physical, occupational, respiratory, and speech therapy. Moments maintains it will contract with these therapists based on patients' needs.

(g) Proposed arrangements for providing inpatient care.

Citadel Healthcare LLC (CON application #10657) states it will provide in-patient care and respite care where appropriate by contracting with hospitals and nursing homes to utilize their beds to provide the needed in-patient services, and anticipates no issue in obtaining the needed contracts once awarded a CON.

Continuum Care of Miami-Dade LLC (CON application #10658) states it will contract with SA 11 nursing homes and hospitals to meet the needs of its patients and will not build freestanding hospice facilities. This allows the patient to remain in the same facility and seamlessly transition to hospice, in place. This is better continuity of care for the patient and for the family. Continuum provides sample nursing home and hospital nursing home inpatient agreements in the supporting documents of this application.

Moments Hospice of Miami, LLC (CON application #10659) states that no inpatient beds are proposed in this CON application. The applicant contends it will arrange for inpatient care through contractual arrangements with SA 11 nursing homes, hospitals, and other facilities to meet the needs of its patients. The applicant concedes that it did not garner support from all these facilities as they are under contract with existing providers, but many did and can be found in the application's Volume II, Attachment 8.

- (h) Proposed number of inpatient beds that will be located in a freestanding inpatient facility, in hospitals, and in nursing homes.**

Citadel Healthcare LLC (CON application #10657) will contract to provide in-patient services.

Continuum Care of Miami-Dade LLC (CON application #10658) develop relationships with existing ALFs, SNFs and hospitals to use their existing infrastructure to provide the residential and inpatient component of hospice care. The applicant has already met with representatives of the following SNFs and ALFs that have relayed their willingness to work with Continuum Care of Miami-Dade LLC if awarded CON application #10658 to operate in SA 11. The applicant provides the list of organizations from earlier responses.

Moments Hospice of Miami, LLC (CON application #10659) states that no inpatient beds are proposed in this CON application. The applicant contends it will arrange for inpatient care through contractual arrangements with SA 11 nursing homes, hospitals, and other facilities to meet the needs of its patients. The applicant concedes that it did not garner support from all these facilities as they are under contract with existing providers, but many did and can be found in the application's Volume II, Attachment 8.

- (i) Circumstances under which a patient would be admitted to an inpatient bed.**

Citadel Healthcare LLC (CON application #10657) provides a list titled "Symptom Management," showing: Intractable pain, Active analgesic medication adjustment necessary to control pain, Fluctuating/deteriorating mental status necessitating titration of medications, Severe shortness of breath or respiratory distress creating an unmanaged situation for the patient and family, Intractable nausea and vomiting trauma, Need for continual close observation and monitoring of unstable recurring medical condition, Other complicated care: frequent respiratory suctioning/GI suctioning, etc.

Continuum Care of Miami-Dade LLC (CON application #10658) indicates that general inpatient care will be provided in a contractual hospital or nursing home within

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SA 11, for patients who need pain control or acute/chronic symptom management which cannot be managed in other settings. The necessity for inpatient care and paid lengths of stay will be determined by the IDT. If a Continuum Care patient needs hospitalization for any reason unrelated to the terminal diagnosis, traditional Medicare Part A would be utilized. Continuum indicates that in addition to general inpatient care, the applicant will employ admission criteria for inpatient respite care; respite care is offered on an “as needed” basis for a maximum of five days per respite admission under Medicare or Medicaid. The applicant comments that for patients covered under other insurance, the duration of respite services may be longer. Further, this benefit may be used to give the family/caretaker a rest and the patient does not need to meet acute care standards. Continuum asserts an aim to assure the continuity of care between inpatient and outpatient settings by developing a specific policy focused on communication among team members, hospital staff, physicians and other services. The applicant comments that the aim is to assure there are no gaps in treatment and patient needs through the transitions in levels of care. Continuum Care provides sample Policies & Procedures for Inpatient Services (General Inpatient & Respite) in supporting documents of this application.

Moments Hospice of Miami, LLC (CON application #10659) states it will have contractual agreements with SA 11 nursing homes, hospitals, and other facilities to provide hospice inpatient care. The applicant concedes that it did not garner support from all these facilities as they are under contract with existing providers, but many did and can be found in Volume II, Attachment 8 of the application. Moments does not directly answer this question.

(j) Provisions for serving persons without primary caregivers at home.

Citadel Healthcare LLC (CON application #10657) reiterates its commitment to serving those without a Primary Caregiver at home, utilizing the Care Plan, the social worker will counsel and discuss options which can be developed and implemented as the following: the patient having a family member, friend or significant other move in with him/her at a point when he/she is no longer safe to remain alone, the patient hiring paid caregivers to stay with him/her in his or her home when he/she is no longer safe

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to remain alone, the patient can choose to move in with other family friends loved ones or significant others when he/she is no longer safe, or the patient can choose to move into a skilled nursing facility or other appropriate paid residential setting when his or her care needs or needs care needs are too extensive for the home environment.

Citadel Healthcare LLC assures its Hospice Service Care plan form is utilized to document the plan/agreement with the hospice interdisciplinary team and the patient/family and/or significant others relative to the plan that has been put in place when the patient can no longer safely remain alone in his or home environment.

Citadel Healthcare LLC further discusses its response to the homeless.

1. The applicant details that when homeless patients are referred, the admissions are completed jointly by the Hospice RN and the Hospice social worker on the day of referral based on the physician or patient's request, in order to do an initial comprehensive assessment focused on covering all basic needs of the patient and/or family (since the patient family is the unit of care and hospice).
2. The applicant again discusses some of the key issues facing many homeless patients beyond the obvious lack of housing/safe home environment including substance abuse problems, mental illness, lack of social support, as well as lack of financial resources and no medical insurance. Citadel Healthcare LLC states these challenges complicate the homeless patient's ability to engage in end-of- life care planning, adhering to medication regime, and finding an adequate site to receive terminal care. They note that the key focus areas during this initial comprehensive assessment are:
 - a) The patient's social and emotional isolation and need for advanced care planning. As a team, the nurse and social worker educate and discuss care options with the patient.
 - b) The patient's need for a safe environment analyze and a right to choose their location for care.
 - c) The social worker will discuss the patient with the patient and assist him/her in finding potential

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resources to pay for the for a location and the nurse will determine the patient's potential ability to comply with different types of medication regiments, keeping appropriate pain medications management options in mind based on the patient's individual psychosocial and environmental needs.

d) These issues are all complicated when during an initial assessment of the patient being assessed is actually not alone but has family that is also affected by homelessness. With the hospice unit of care being the patient and family, all issues can be exacerbated and must be addressed for the entire unit since they impact the patient directly. The social worker will be responsible upon patient/family admission to begin to assist in finding:

1. Shelter for the entire family unit;
2. Assisting with financial resources to sustain the entire unit
3. Discussing with the entire family the impact of the terminal disease on the patient and all of their lives.

Continuum Care of Miami-Dade LLC (CON application #10658) states it is committed to serving all patients including those who do not have primary caregivers at home and this is evidenced by Continuum Care's history of serving these patient populations in its existing markets. Continuum Care indicates it will admit patients to its hospice service even if the patient does not have a caregiver at home. In the case that the patient is not able to care for his/herself and has no caregiver support group, the applicant comments that it may recommend placement in an ALF or SNF where the hospice program will be able to provide residential care. Further, Continuum Care of Miami-Dade LLC social workers will assist patients without financial resources to obtain residential care in a hospice unit within an ALF or SNF, as determined by their medical condition. The applicant maintains that either it will establish relationships with area SNFs and ALFs with per diem contracts or develop hospice units as the need arise (contract samples are included in supporting documents of this application).

Moments Hospice of Miami, LLC (CON application #10659): The applicant will care for SA 11 patients without primary caregivers at home and the homeless through its Open Access program. The applicant states that it is about everyone's right to equitable hospice care, and that a patient's caregiver situation, homelessness, religious beliefs financial situation, or need for more expensive comfort measures is never a cause for Moments to deny care. The applicant will place homeless patients and patients without caregivers or homes in assisted living facilities or nursing home.

(k) Arrangements for the provision of bereavement services.

Citadel Healthcare LLC (CON application #10657) replicates most of its response to this from its response in item E.2.a. (5) of this report and states that services are provided for up to 18 months after the patient's death. The applicant states it will provide:

Bereavement and grief support programs will be made available to all service area residents regardless of whether there is an established relationship with Citadel Healthcare LLC.

Individual and family grief support including:

- Telephone grief support.
- Grief support groups.
- Individual grief support counseling.
- Specialized grief support groups for teenagers.
- School group school support groups.
- Memorial services.
- Coping with Grief Through the Holidays program. Community outreach education programs focused on grief. Yoga for the Grieving Heart sessions (yoga that focuses on breathing techniques and ways to reduce stress for individuals of all skill levels).
- Family weekend Bereavement Retreat.
- Bereavement camps for children.

Citadel Healthcare LLC will provide specially trained Bereavement specialists who provide bereavement services:

- In coordination with the volunteer coordinator develops and directs programs for recruitment, training, and retention of bereavement team.

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- Assists in the marketing and the of the hospice by making the Company a community resource for dealing with grief.
- Provides a bereavement program to families that is open ended to accommodate varying needs of grieving families.
- Participates in hospice programs providing orientation, training, and education to all volunteer and bereavement staff.
- Holds Grief supports for survivors, staff, community. Participates in the organization, implementation and maintenance of the bereavement program.
- Writes letters, make phone calls and provides personal visits to support families in the grief process both prior to an after the death of a loved one.
- Develops resource materials and supportive collateral pieces to support the bereavement and volunteer programs.
- Participates in and provides community programs on hospice and related issues of end-of-life, as well as memorial events.
- Overseas the development and maintenance of a resource library of written materials, videos, and referral sources for families and hospice staff.
- Develops a resource directory to support families and who need assistance in the grief process.
- Participates in an annual review of all the members of the bereavement team.
- Participates in a regularly scheduled meetings for coordination of patients care, exchange of information, problem solving, to receive staff and in-service education.
- Prepares reports for the Administrator or Clinical Director as requested.
- Participates in agency quality improvement program.
- Tracks the bereavement team activity to ensure compliance with state and federal guidelines.

The applicant includes the qualifications it sets for the Bereavement Specialist position on pages 56 and 57 of this application.

Continuum Care of Miami-Dade LLC (CON application #10658) contends that bereavement services are an integral part of the hospice program; the applicant will have a social worker and spiritual counselor available to assist families

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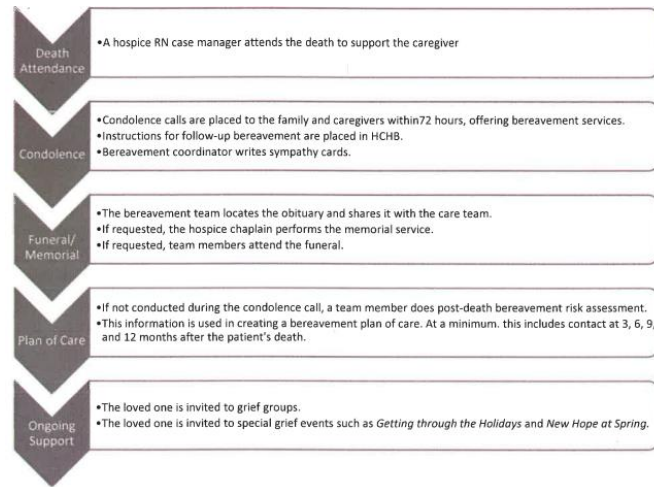
during the emotionally difficult time of loss, as well as provide information on common aspects of anticipatory grief. Following a hospice patient's death, Continuum Care indicates that it will continue to provide bereavement support to grieving families for one year.

Continuum states that while one individual is identified as the primary contact with the family, the spouse or primary caregiver and all members of the family are eligible to receive bereavement services. Further, the bereavement plan of care is developed based on an assessment of the patient/family needs at the time of admission and provision of hospice care, and again when the patient dies. The applicant states this initial bereavement assessment includes grief or loss issues, survivor needs, services to be provided, referrals to be made, grief risk factors, potential for pathological grief reactions, individual counseling, support groups & social, spiritual and cultural needs. Further, after the patient's death occurs, the bereavement coordinator will complete the bereavement follow-up assessment; the applicant will develop a plan for intervention based on the findings of this assessment and all family bereavement interventions are documented plans to employ a bereavement coordinator to be responsible for the planning, implementation and maintenance of the bereavement program to meet the needs of families and caregivers for up to one year following the death of the individual hospice patient.

Moments Hospice of Miami, LLC (CON application #10659) contends that the bereavement program begins at admission where the registered nurse, social worker, or chaplain completes an initial an initial bereavement risk assessment with within five calendar days of the patients' admissions to hospice. The patient's needs are then incorporated into the patients' hospice plan of care and the bereavement coordinator may become involved before the patient dies if there is a need for assistance in addressing anticipatory grief or complicated grief issues. The care team communicates with the bereavement coordinator about the family or primary caregiver or patient's needs. The process of services is tracked through Homebase Home Care. Community members grieving the loss will greet will receive the same level of support as those who had a family member with Moments. When the team meets after a patient's death, they discuss with the bereavement

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coordinator all the complications or dynamics involved and are tracked in Homebase allowing the team members to access contacts and information. The applicant provides a chart showing the process for Moment's bereavement program.



Source Moments Hospice of Miami, LLC/CON #10659 Vol. 1, page 189

The applicant goes on to state the levels of risk for bereavement:

- Low risk which is considered normal grief.
- Moderate risk when a person falls under this rating, they realize that additional services may be needed to help them navigate the death, they offer support groups and community resources to be integrated into the bereavement plan of care. The applicant will call and visit them more than the low-risk category.
- High risk which is considered complicated grief. The bereavement coordinator will take immediate action should take immediate action with anyone with complicated grief and they are usually referred outside to professionals such as mental health therapists or physicians. The staff continues to contact these individuals and encourage them to attend support groups, integrating community resources into that plan of care.

Moments affirms it tailors each bereavement plan to the individual needs and list below programs and forms of contact that are typical of what Moments offers to patients loved ones:

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- Sympathy cards.
- Team members attending the funeral or memorial service for the patient.
- Mailings and letters.
- Telephone contacts. Face to face or virtual visits.
- Support groups.
- Memorial services.
- Referrals are to professionals such as therapists and physicians. Individual counseling provided by the bereavement counselor as appropriate.
- Resources to be provided. Invitation to special bereavement events.
- Collaboration with individual's mental health and medical team has indicated.
- Educational resources.
- Other unique items identified by the bereavement coordinator or IDG team members.

Moments provides it offers many different additional services that can be added to a plan of care to enhance the bereavement program. They are:

- Grief yoga which can be offered virtually or in partnership with the local yoga studio, the connection of breath and general posture supports emotions moving through the body and provides a healthy form of coping with grief.
- Time in nature this great grief support group meets at predesignated parks to experience the healing power of nature and the calming effect that quietly roaming down the path provides.
- Grief journaling which is writing, provides a connection to the heart and allows for expression of conscious and subconscious thoughts. Writing prompts to allow for expression while moving through the grieving process. A facilitator is available to provide emotional support as emotions come to the surface.
- Healing with animals whether it is spending time with a certified therapy pet or visiting a partner stable, animals have a way of touching our hearts and allowing emotions to flow.
- Coping with grief while in recovery a support group is specifically created for those who have participated in 12-step or other recovery programs groups.

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- Meditation and breathing healing these workshops teach people to how to connect with their bodies and mindfulness practices. Guided meditation, breathing techniques, and other meditation and techniques are taught and experienced.
- Ladies' afternoon is a tea ladies' group that meets regularly for tea and community, while navigating the grief process.
- Men's grief group. A gentleman's group where it is safe to talk about feelings and understand you are not alone. Healthy expression of emotions is encouraged, and community is built.
- Grief retreats. Day long retreats allow the bereaved to step away from the hustle and bustle of life and gain a deeper understanding of their grief. This retreat is experiential and educational exploring the stages of grief and techniques for working through the grieving process.
- Veterans grief support group. Veterans supporting veterans through the grieving process.
- Memory making. Workshops from bereaved who have lost someone in the past month activities may include making pillows out of the loved one's clothing or making memory shadowboxes, luminaries etc. While crafting this group shares stories and heals together.
- LGBTQIA+ support groups our support groups for members of the LGBTQIA+ community who may feel more comfortable sharing their bereavement journey with other LGBTQIA+ community members.

Moments states again that it offers a memorial service and service for up to 24 months if a need exists. The applicant states that it makes two documented attempts to contact the bereaved and sends a letter if unable that explains what steps to take to initiate bereavement services.

(I) Proposed community education activities concerning hospice programs.

Citadel Healthcare LLC (CON application #10657) replicates most of its response to this from its response in item E.1.a. of this report.

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The applicant submits the list that includes, but is not limited to, the following underserved groups that it commits to service:

1. African American
2. Hispanic
3. The homeless
4. Patients without caregivers in their residences
5. Rurally remote patients
6. Patients residing in areas without adequate physician services.
7. Veterans
8. Some religious groups
9. The prison population and the “recently released” prisoners.

The applicant states that it will condition this application to provide a minimum of two educational programs per year intended to increase the awareness of the value of Hospice services to individuals meeting one or more of the groups listed above. The applicant conditions this as Condition number of this application.

The applicant explains that potential hospice patients will be educated as to when hospice services are appropriate, how to access general health care services, and learn how to access hospice care.

The applicant intends to utilize traditional education opportunities as well as special meetings. These are limited these are including but not limited to provisions of educational meetings to senior groups, meetings advertised in the local assisted living facilities, shelters, food, kitchens, churches, veterans’ groups and nursing homes, and attendance and presentation at health fairs.

Citadel Healthcare LLC provides further information about their Continuing Education for Healthcare Professionals, stating that whenever possible, presentations, and workshops for CME and CEU credit will be offered. They cite the following principles are utilized in the development of continuing education:

- New educational methods based on innovation and evaluation.
- Integration of the continuing education into daily clinical practice period

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- The best available evidence for practice is used in education development.

The applicant notes corporate functions include the development of programs focusing on new models of care more effectively to treat chronic and advanced illnesses. Their primary strategy is to educate health care professionals in the use of home-based advanced illness management.

Continuum Care of Miami-Dade LLC (CON application #10658) indicates it will provide extensive community education activities surrounding the benefits of hospice to increase hospice awareness and utilization. The applicant comments its minority team will be involved in educating and assessing minority populations and these professionals will be responsible for leading the outreach for specific disease focused programming, further developing relationships throughout the community and coordinating educational sessions, presentations and other outreach activities throughout SA 11. The applicant asserts it will educate SNF and ALF constituents on the myths and benefits of hospice. Continuum Care indicates that it will host hospice educational events at senior organizations, African American organizations, religious affiliated groups, Hispanic organizations, Veterans organizations and health fairs, all in effort to educate the community at large on the benefits of holistic end-of-life care through hospice.

Moments Hospice of Miami, LLC (CON application #10659) conveys its understanding of the importance of outreach in the community and references its information on page 71 of this application to further describe its process. The applicant states it has conditioned this process and cites Schedule C for further descriptions and on the chart provided below:

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Education Vehicle

- Building on the success of the education trailer used in its existing operations, Moments conditions its application on dispatching an education vehicle within three months of receiving accreditation.

Rural Outreach

- To serve the more rural areas of District 11, including Monroe County, Moments will employ community relations representatives focused on carrying out rural outreach efforts. There will be one such employee in the first year, and two in the second.
- This outreach staff will be able to deploy the mobile education vehicle for events and community education.

Cardiac Disease Education

- As part of its Heart program, Moments will provide community trainings on cardiac disease as it relates to hospice and quality of life. These trainings will be offered at least two times a year and will be open to the public.

Pulmonary Disease Education

- As part of its Breathe program, Moments will provide community education on pulmonary disease as it relates to hospice and quality of life. These trainings will be offered at least two times a year and will be open to the public.

Alzheimer's Disease Education

- As part of its Respect program, Moments will provide community education on Alzheimer's disease as it relates to hospice and quality of life. These trainings will be offered at least two times a year and will be open to the public.
- These trainings will include information on the Namaste Care program, which is described in detail in Attachment 15.

Participation in the Local Chambers of Commerce

- Moments Miami has joined the South Florida Hispanic Chamber of Commerce and the Miami-Dade Chamber of Commerce and is developing relationships with their members and has conditioned this application on maintaining its memberships.
- Moments is working with Chamber members to identify how it can serve South Florida's Hispanic residents and other underserved residents, including outreach and hospice education events.

Source Moments Hospice of Miami, LLC/CON #10659, Vol. 1, Page 194

Moments will utilize easy-to-understand publications in English and Spanish which offer contact information for local admissions teams, and the Circle of Care (its information on end-of -life care), its music therapy program.

Moments asserts that many Medicare beneficiaries in District 11 receive medical care primarily through community clinics and that many of these clinics are open seven days a week and provide patient transportation, bilingual clinical staff, and on-site pharmacies. The applicant contends many patients receive all their routine care through these clinics. Moments states it has identified these clinics as excellent venues for patient, family, and provider education on hospice care. Moments conditions this application on holding hospice education events for clinic staff, patients, and families quarterly and having a full-time equivalent hospice care consultant dedicated to working with the community clinics in Miami-Dade during the first two years of operation.

(m) Fundraising activities.

Citadel Healthcare LLC (CON application #10657)

contends it will not solicit funds will provide a list of local charities, and 501(c)(3) foundations to encourage the funds remain in the community.

Continuum Care of Miami-Dade LLC (CON application #10658) states that it has an independent 501(c)(3) charitable organization dedicated to raising the funds necessary to help hospice and palliative care patients. Continuum Care points out that the vast majority of the funds the foundation has are from the generous gifts from former patients and their families. The applicant asserts that it will not actively raise funds from the community, but if an individual wants to make a charitable donation, they will be directed to Continuum Care Hospice Foundation's website.

Moments Hospice of Miami, LLC (CON application #10659) contends it will not solicit charitable donations and will not engage in fundraising activities. The applicant assert that any unsolicited donation will be given to the Moments Hospice Foundation which will stay in the community.

- b. Rule 59-1.0355(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 applicants state that they will submit the required semi-annual utilization reports to the Agency if approved.

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 stated in item E.1.a of this report, in Volume 47, Number 24, of the Florida Administrative Register, dated February 5, 2021, need for one hospice program was published in SA 11 for the July 2022 hospice planning horizon. The applicants are applying in response to published need.

The following chart illustrates SA 11 hospice admissions for the past five years, ending CY 2020. As shown below, the reviewer notes the following characteristics regarding total admissions:

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- Increased in CY 2017 and CY 2019 from 2016 and 2018,
- Decreased in CY 2018 and CY 2020 from previous years

For the five-year period, the lowest total admission count (13,186) was for CY 2016 and the highest total admissions (13,884) were in CY 2019. See the table below.

**Hospice Admissions for Hospice Service Area 11
CY 2016 – CY 2020**

Calendar Year	Admissions
2020	13,838
2019	13,884
2018	13,732
2017	14,056
2016	13,186

Source: Agency for Health Care Administration Florida Need Projections for Hospice Programs, issued March 2017 – March 2019 and February 2021 and unpublished CY 2019 utilization as reported to the Agency by Florida's licensed hospice programs.

As previously stated in item E.1.a of this report, SA 11 is currently served by the following providers:

- Amedisys Hospice f/k/a Compassionate Care Hospice of Miami-Dade and the Florida Keys, Inc.
- Bristol Hospice – Miami-Dade, LLC
- Catholic Hospice Inc.
- Chapters Health Hospice f/k/a Hospice of the Florida Keys, Inc.
- Heartland Hospice Services
- Kindred Hospice
- Opus Care of South Florida
- Seasons Hospice & Palliative Care of Southern Florida Inc.
- VITAS Healthcare Corporation of Florida

Citadel Healthcare LLC (CON application #10657) replicates most of its response to this from its response in item E.1.a. and E.2.a of this report. The applicant will condition this application with Condition number four, on the establishment of an educational outreach program.

The applicant will present these in Hispanic and African American settings such as religious settings, schools, hospitals, and medical clinics. Citadel provides tables 17 and 18 on pages 63 and 64 to support their argument that this population is significant.

Citadel Healthcare LLC will service the homeless by going to facilities that care for the homeless. as religious settings, soup kitchens, shelters area medical clinics, hospital emergency rooms, and social service departments. Further, it will reach out to ALFs, develop target

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educational materials, distributing them to the appropriate individuals within the community, and providing seminars to the targeted groups at locations they frequent.

Citadel provides hospice admissions in tables 20 and 21 on pages 68 and 69 to support its argument for population growth and an availability and/or accessibility issue related to end-stage pulmonary Service Area 11. The applicant argues that because of its services to SA 11 since 1983, with the knowledge of medical and socio-economic infrastructures, it is the best choice in this batching cycle. Citadel states there is a table on page 69, but only provides this list:

1. Education through schools, blogs, and social media
2. Meetings at shelters, and/or soup kitchens where the homeless might be accessed
3. Meetings attended by Hispanics
4. Meetings attended by African Americans
5. Meetings attended by small churches
6. Meetings attended by Catholics
7. Marketing to the smaller boarding homes and ALFs in addition to other marketing efforts.

Citadel Healthcare LLC describes in great detail its reputation within SA11, stating that it does not “Selectively Choose” patients and that its desire is to meet not only the needs of the general public but also the specific death and dying traditions of each of these subsets noted within the application. Further, it will develop a program reflecting the Jewish traditions, reach out to Catholic and other religious leaders and will continue to work with the African American population and the Hispanic population to be certain that these groups are aware of Citadel’s services.

Citadel Healthcare LLC developing programs such as utilization review, pre-admission screening, appropriateness review, patient care plans and will finalize policies and procedures an advance so they can adequately train the employees. The applicant states it will provide a full range of services including but not limited to nursing, social workers, medical supplies and pharmaceutical deliveries, night and weekend visits, contract for respite care services, volunteer companion services, provisions of clerical (pastors, rabbis, priests etc.), HIV/AIDS services and information.

The applicant contends it is committed to meeting the needs of its patients seven days a week, 24 hours per day as well as offering multilingual services to minorities, dedicated to providing quality care to indigent and AIDS patients alike, helping them qualify for state or federal assistance. Citadel restates that it will employ bilingual staff

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which will be 75 percent of the RNs, 60 percent CRNAs and 65 percent of its PTs being bilingual. The proposed office locations will provide better coverage and its ability to obtain office space in the same building will lead to economies of scale, including but not limited, to supply acquisition, computer resources, shared per diem employees, and employee coverage.

Citadel asserts that quality of care increases with increased accessibility and this project improves the quality by:

- Providing a service appropriate to the level of care required.
- Allowing physicians to utilize Med-Care Hospice Services and Med-Care Home Health Services for their patients will improve the quality of care for the patient, the patient's family, and the physician.
- The physician would be able to speak with one company and not two.
- Providing the community with another provider.
- The applicant will follow all procedures required to obtain licensure.

Citadel contends that as an existing Florida provider, with much experience regarding licensure procedures and requirements, it will be able to obtain licensure and SA 11 in a highly efficient manner. Further, it will meet all requirements for administration of the hospice program in SA 11, including:

- Establishing the composition and bylaws of the governing body for the conduct of the hospice program
- Employing an administrative officer
- Utilizing administrative policies and procedures that ensure the most efficient operation of the hospice program and the safe and adequate care of the patient and family units, including
- Policies governing admission to the hospice program and discontinuation of curative care.
- Personnel policies
- A plan for orientation and training of all staff, including volunteers, which ensures staff receives training prior to the delivery of services
- Financial policies and practices
- Policies for administering drugs and biologicals in the home
- Policies and procedures for the administration and provision of pharmaceutical services in in-patient and residential settings consistent with the drug therapy needs of the patient as determined by the medical director of the patient's attending physician(s)

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- Policies and procedures approved by the medical director and governing body pertaining to the drug control system in the hospice including specific policies and procedures for disposal of Class II drugs upon the death of a patient
- Procedures which ensure the hospice can provide patients with medication on 24 hours a day, seven days a week basis
- Policies and procedures for maintenance, confidentiality, and retention of clinical records for a minimum five-year period following the patient's death
- Procedures for in-patient visitation by family and friends
- Procedures for maintaining a record of requests for services
- Notice to the public that the hospice provides services regardless of ability to pay
- Notice to the public of all services provided by the hospice program, the geographic area in which the services are available, and the admissions criteria
- Policies for educating the community to enhance public awareness of hospice services
- Policies and procedures for completion, retention, and submission of reports and records as required by the department, agency, and other authorized agencies
- Policies and procedures for implementing universal precautions as established by the Centers for Disease Control and Prevention
- Providing equipment and personnel under, under medical supervision, for diagnostic procedures to meet the needs of the hospice in-patient, residential and home-care programs
- Providing an infection control program, specifying procedures and responsibilities for in-patient, residential care, and home-care programs
- Measuring and reporting outcome measures, including conducting the National Hospice and Palliative Care Organizations in (NHPCO) Patient/Family Satisfaction Survey, or a similar survey, with its patients and families
- Compliance with the national standards and initiatives

Further, it will provide a Coordinated Care Program consistent with the requirements including:

- Ensuring the development, documentation, and implementation of a staffing pattern for all components of a hospice program (residential, and home-health care)
- Ensuring the quality of care provided to its patients who are receiving in-patient and respite services in a contracted facility

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- Ensuring the development, documentation and implementation of a current plan that delineates cooperative planning, decision making and documentation by the disciplines represented in the members of the hospice care team, and which provides the staff with methods of meeting collective and individual responsibilities as outlined and assigned in the plan of care for each patient and family unit Ensuring the hospice care team provides a mechanism for patients and their families to communicate directly with a member of the hospice care team, and the hospice care team is able to respond to such requests on a 24-hour a day, seven day a week basis, and providing continuity of services without interruption through all modes of care delivery in the hospice program

Citadel Healthcare LLC indicates further discussion is located under appendix PP. Its QAUR/QAPI plan will be implemented in Miami-Dade and Monroe Counties and will be in accordance with Medicare conditions for participation, include goals and objectives, provisions for identifying and resolving problems, methods for evaluating the quality and the appropriateness of care, and the effectiveness of action taken to resolve identified problems, and establish a process for revising policies, procedures, and practices when reviews have identified problems. The applicant will continue to improve the quality and performance of its hospice programs, and the primary focus on palliative outcomes and end-of-life support services. Citadel Healthcare LLC contends that the results of Med-Care Hospice Services' performance improvement process will be utilized to improve the quality of care and patient safety. These will be used to address any problem issues that may arise and will be incorporated into program planning, process design and modifications.

The applicant notes that all personnel will be active participants in quality assessment and performance improving activities and focusing on the quality of patient and program outcomes, the assessment, planning and implementation of care and services, and evaluation of goal attainment that is individualized to each specific patient. Opportunities for improvement related to patient outcomes will be identified through continuous measurement of patients or satisfaction survey results, clinical/service record review, monitoring of incidents and infection control reports and adverse event reports.

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Citadel Healthcare LLC components of its performance and quality improvement program include:

- Measurement of performance of the environmental safety program
- Annual evaluation of the organization, which includes evaluating hospice leadership
- Information and analysis
- Strategic quality planning
- Human resource development and management
- Quality assessment of products and services
- Quality and operational results
- Customer focus on and perception of care
- Incident reporting
- Sentinel events
- Root cause analysis and action planning
- Aggregated aggregation of data and information for leadership and management decisions, including external databases
- Patient and family perception of care/service.

Med-Care Hospice Services' performance and quality improvement policies and procedures are included in the application's Appendix RR.

Med-Care Hospice Services will employ two medical directors in Miami-Dade and Monroe Counties whose qualifications and duties meet all the requirements under this rule. Med-Care has identified Dr. Felipe Gascon as one of its medical directors who will be responsible for the direction and quality of the medical component of the care rendered to the patient by the hospice team. The applicant affirms it will employ a supervising registered nurse who will monitor all services provided by hospice nurses, home health aides, and all other nursing/home health aide staff required to meet the health needs of its hospice patients.

Citadel asserts that the nurses and CNAs would be expected to see all the patients at appropriate intervals based on their condition. It reiterates that it will employ chaplains consistent with the requirements of the rule and that it will place special emphasis on reflecting the needs of each specific groups and that programs will be developed and implemented to recognize the need of each of the races and regions served.

Citadel Healthcare LLC declares that it will employ a social worker and all necessary counseling services in SA 11 are specified under this rule.

Continuum Care of Miami-Dade LLC (CON application #10658)

reiterates its response in The Agency's Question 1, Fixed Need Pool.

1. The applicant contends that Hispanic and Black minority groups in Miami-Dade and Monroe Counties are not being served compared to their non-Hispanic and Caucasian counterparts
2. The applicant asserts that to address the non-cancer disease specific programming specifically those with cardiovascular and nervous system diseases
3. The applicant asserts that to address the need for cancer disease specific programming.

Continuum will employ its "Home Care Home Base" program to enhance the availability and accessibility of efficient hospice care in SA 11.

Moments Hospice of Miami, LLC (CON application #10659) refers to its response on the application's page 55 for further detail. Moments states that it has identified, after conducting needs analysis of SA 11, several populations with unmet needs:

- Residents with a Cause of Death other than Cancer
- Residents in Nursing Homes
- Residents Needing Open access
 - Patients without DNR Orders
 - Patients with Expensive Medications or Treatments
- Residents with Cultural Barriers to Accessing Hospice: Hispanic, Black and LGBTQIA+ Residents.

Moments restates it has conditioned hiring a full-time employee to manage, monitor, and report on the conditions of this application. The applicant offers the following "Solutions" table to summarize its response to this unmet need.

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Solutions for Open Access and District-Wide Access to Care for All District 11 Residents
<ul style="list-style-type: none">• Moments will open three offices (7) which will quickly be CHAP accredited and Medicaid certified (17).• To provide service to the rural areas of District 11, Moments will employ one hospice care consultant (7), offer telehealth (22), and provide car leases to qualifying staff members (23).• Through Open Access, Moments will accept all eligible patients, even those who have chosen to continue expensive medical treatments or will not sign a DNR order (1).• Moments will assist with financial stresses through a minimum annual budget of \$7,500 for the provision of end-of-life funds and a \$25,000 annual donation to Moments Hospice Foundation (21).• Moments will offer free hospice to uninsured homeless, provide education, and donate \$40,000 to homeless support and housing at end of life (14). Moments also commits to charity care of at least 5 percent of admissions (5).• Moments will obtain CHAP Palliative Care Accreditation and offer palliative care for people either not eligible or not ready for hospice (18).
Solutions for Residents with Barriers to Hospice due to Cultural or Religious Reasons
<ul style="list-style-type: none">• Moments has created an Inclusion & Access Advisory Committee (IAAC) with subcommittees focused on Hispanic, Black, and Jewish communities (6).• Moments' nurse practitioner and 50 percent of volunteers will be bilingual (9). A bilingual hospice care consultant will be dedicated to working with community clinics (10).• Moments will donate \$20,000 to Liga Contra El Cancer (9) and will be a member of the National Institute for Jewish Hospice (11), the South Florida Hispanic Chamber of Commerce, and the Miami Dade Chamber of Commerce (25).• Moments will introduce the LGBTQIA+ Inclusion Program (12).• Moments will operate a mobile education unit (8).
Solutions for Residents with a Non-Cancer Diagnosis
<ul style="list-style-type: none">• Moments will provide its Heart, Breathe, and Respect programs to hospice patients in District 11 (4).• Moments will provide diagnosis-focused staff, community, and healthcare provider education (4).• A respiratory therapist will be contracted and available upon commencement of hospice operations (4).
Solutions for Residents in Nursing Homes or Assisted Living Facilities
<ul style="list-style-type: none">• Moments has successfully partnered with many assisted living facilities in its current service areas.• Moments will implement the Initial Moments program, which is designed to meet the more complex challenges of facility-based hospice care (2).• Through training, staff will be better equipped to meet ALF residents' needs and partner with ALF staff (13).• Moments will attain We Honor Veterans level 4 certification (15).
Solutions for a High-Quality Hospice Provider
<ul style="list-style-type: none">• Moments will provide five CNA visits per week and three nursing visits per week, on average (21), and start the admission process within 90 minutes of referral (21).• Moments will offer a wide array of programs beyond the standard hospice benefit, such as Virtual Reality, Legacy Projects, Namaste Care, Music Therapy, Pet Therapy, and Massage Therapy (22).• By implementing the Final Moments program, Moments will utilize artificial intelligence to identify patients entering their last week of life, increase the frequency of visits, and provide death doulas (3).• Moments will implement a 24-hour nurse triage call line, offer internships for District 11 students, and provide bereavement services for up to 24 months (22).• Moments will partner with the Children's Bereavement Center (16) and host annual food drives (24).• Moments will ensure staff are well trained through education requirements and by offering specialized training (e.g., Reiki, death doula) and paying for Hospice and Palliative Care certifications (19).• Moments will provide a compliance hotline (20).

Source Moments Hospice of Miami, LLC/CON #10659, Vol. 1 page 199

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) and (10), Florida Statutes.

The reviewer notes that the Hospice quality characteristics found at the Centers for Medicare and Medicaid Services' website include 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 CHAPS information for the two applicants with existing hospice programs, compared to the averages for SA 11 and State of Florida hospices.

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**CAHPS Data
January 1, 2018 through December 31, 2019
for the applicants with existing Hospices**

Hospice	Willing to recommend this hospice	Commun. with family	Getting timely help	Treating patient with respect	Emotional & spiritual support	Help for pain & symptoms	Training family to care for patient	Caregivers rated the hospice a 9 or 10	Avg. Score
Continuum California	84%	77%	71%	89%	88%	71%	73%	78%	79%
Moments Minnesota	77%	73%	70%	89%	91%	74%	72%	83%	75%
SA 11 Hospices Avg.	79%	75%	72%	85%	87%	71%	68%	76%	77%
State Average	84%	78%	75%	88%	89%	73%	70%	80%	80%

Source: CMS.gov website @ <https://www.medicare.gov/care-compare>.

The reviewer notes that the CY 2019 HIS – Hospice and Palliative Care Composite Process Measure – Moments Minnesota was 81.1 percent compared to Continuum California’s 99 percent, Florida hospices average 94.2 percent and the national average is 88.7 percent. The composite measure is the ‘Patients Who Got an Assessment of All 7 HIS Quality Measures’ at the above site.

Citadel Healthcare LLC (CON application #10657) is a newly formed entity with no operational history. However, the applicant notes that the parent, Med-Care has an excellent record providing quality licensed health care services, providing “Hospice like care” within its Home Health Agency. Citadel Healthcare LLC provides the following supporting the history:

- 2,267 employees comprising 1,259 full time equivalents.
- Service to every zip code.
- More than 131,433 capitated lives in Miami Dade and are represented in every zip code.

The applicant notes that its mission is to provide compassionate care and extraordinary service to the patients and families it serves. Further, its management philosophy is to focus on our people, on quality and customer service and their business results will follow. Citadel provides brief biographies of key personnel on pages 81- 83 and in appendix D of the application.

Citadel Healthcare LLC states it is committed to the provision of quality care and will:

1. Encourage its nurses through training, compensation incentive and support to become board certified in hospice in palliative care

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2. Physicians will make regular visits to the patients and provide bedside care
3. Provide 24-hour direct telephone access to the Medi-Care Hospice Service staff (triage nurse)
4. Provide weekend visits to patients in long term care facilities and assisted living facilities by nurses, chaplains, and social workers
5. Have trained bereavement specialist to provide grief and loss counseling, memorial services and other support services for family and loved ones
6. Hire a volunteer Director
7. Have a minimum of 75 percent of its staff who are bilingual and a contract to provide translation services to all patients /families who do not speak Spanish, English or one of the other languages spoken by our employees
8. Have a minimum of 60 percent of its staff who are members of the Hispanic and African American communities to meet the cultural needs of this underserved population
9. Develop culturally sensitive programs.

Citadel's Quality Improvement Plan objectives are to:

1. Identify areas of concern
2. Ensure that care provided is appropriate to patient need
3. Revise procedures as necessary to reach the highest level of quality.

Citadel indicates that accreditation is essential to providing a quality service and will seek accreditation no later than two years after it becomes licensed (which is a proposed condition). Further, it will join the Florida palliative care group at the time it becomes Medicare approved to offer services and develop its program standards based on information from the accrediting body and the national Hospice and palliative care organization. Several key elements that will lead to quality improvements include:

1. Establish the new Hospice service using trained personnel
2. Hire quality administrative and clinical executives
3. Hire qualified well-trained clinicians and encourage hospice certification
4. Hire qualified chaplains and social workers
5. Hire compassionate individuals at every level who will place the patient's needs above profit
6. Hire individuals capable of communicating with the patient in their own language
7. Listen to what the patient says and do not allow your personal beliefs to get in the way of meeting the patient's needs

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8. Hire whenever possible, Medical Directors who are board certified in hospice or palliative care medicine or are willing to apply for board certification within five years of employment
9. Create appropriate in service says for all employees.
10. Utilizing patient outcome measures and create employee performance expectations to meet these outcomes
11. Regularly measure employee, patient, and patient's family satisfaction.

Citadel articulates that the factors that will enhance the quality of hospice care go beyond the minimum state and federal requirements, and contends that it will do the following:

- Implementation of procedures to produce an 80 percent reduction in pain score within 48 hours—a much higher standard than the 50 percent and 96 hours is identified in the Florida Statutes
- Some of the co-batched applications will speak to this as being a quality measure for themselves. According to the Department of Elder Affairs report 50 percent of hospice improve pain by over 87 percent (the Department of Elder Affairs 2018 report is included in Appendix T)
- Culturally sensitive programs developed in conjunction with a local community advisory board to address the specific needs of African-American, Hispanic and other underserved populations specific to Miami-Dade and Monroe Counties
- Significant technology such as telehealth/tele hospice resources for patients to prevent or reduce hospitalizations as well as to maintain contact with caregivers
- Electronic medical records so that physicians and staff have constant, updated clinical information on patients to improve care and symptom management
- Commitment to training and certification programs for all staff;
- Having every patient assessed by a physician within 24 hours of admission to the hospice. Medical directors visit patients in their residence
- Masters of Divinity or equivalent graduate degree from an accredited seminary or theological school required for chaplains. The chaplain job description is included in Appendix HH
- Social workers have a Master's degree or are licensed clinical social workers. Social workers job description is in Appendix HH.

In conclusion, Citadel attests it will provide a quality program where the meeting the patients' needs exceed all expectations; a program where the best executives, the best clinicians, the best chaplains, and the most comprehensive individuals in every patient care position want to work for Med-Care Hospice Services.

Continuum Care of Miami-Dade LLC (CON application #10658) is a development stage corporation formed for the purpose of initiating hospice services in SA 11. The applicant reiterates its response to questions 1a and 3b of the application. Continuum speaks of its history and of its founder Samuel Stern mirroring what was said previously under the “Project Summary” portion of this application. It affirms that all “entities are affiliated to one another, through leadership, mission and values and common quality goals.” The applicant describes its experience in the State of Florida in Broward County and Sarasota County, stating its mission is carried out by providing “Non-Core Services such as:

- Music Therapy
- Equine Therapy
- Virtual Reality
- Staffing that exceeds NHPCO minimum requirements for staffing.
- Minority Outreach
- The applicant will assure each patient has five to seven home health aide visits per week, provided this is acceptable to the IDT, patient and family.
- The applicant will assure each patient has a minimum of two RN visits per week, provided this is acceptable to the IDT, patient and family.
- The applicant will seek to respond to all its 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.

Continuum Care states that its unique program and services have the following benefit:

- Improves communication between hospitals, SNFs, primary care physicians and specialists that result in positive outcomes for patients
- Improvement medication management which would have otherwise led to unplanned emergency room visits and/or re-hospitalizations
- Ongoing patient and caregiver education on disease progression, alternative medical services available, expectations as disease progresses, how to manage symptoms, knowing when to call the physician
- Identifying goals of care and decreasing patient and caregiver anxiety by encouraging difficult conversation with patients nearing end-of-life about what they really want
- Serves as a connection to the community for resources to assist in providing additional services that can aid in

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transportation, food services, facility placement, spiritual care, amongst others

- Reduces the patient's propensity to use hospital and/or emergency department as their medical manager and reinforce better options
- Decreases cost of care as patients near end-of-life

Continuum Care will develop and maintain a QAPI Plan similar to those that are already utilized by its affiliate hospices that includes:

- QAPI lines of responsibility
- QAPI Committee composition
- QAPI Committee member responsibilities
- Implementation of a Performance Improvement Plan, with measurable objectives and time frames
- Continuing Education and In-Service Training
- CHAP Accreditation

The applicant goes into great detail on pages 153, 154 and in the application's supporting documents.

Moments Hospice of Miami, LLC (CON application #10659) is a newly formed entity with no operational history. However, the applicant notes that is closely affiliated with Moments Hospice, an experienced provider with 10 licensed and Medicare-certified agencies with 13 offices serving 59 counties in Minnesota and 69 counties in Wisconsin and Des Moines Iowa, metro area. The applicant notes that in 2020, Moments developed two additional hospice agencies in the Chicago Illinois, metro area that are awaiting licensure survey. Moments contends it has a history of providing high-quality care at these exiting hospice programs.

Moments asserts that all of its agencies are accredited through Community Health Accreditation Partners (CHAP) and cites its consistent record of high marks on state and CSHP surveys which it contends shows its commitment to compliance, and to meeting and exceeding standards. The application's Volume Two, Attachment Four contains letters confirming its CAHP accreditation at Moments' existing locations. Moments contends that it has never had a CMS or state complaint survey at any of its facilities or patient homes. Further, it has never had a condition-level survey or been required to have CHAP do a follow up survey. Moments asserts it is survey ready every day at each of its locations and that after surveys, each Moments agency puts a plan of correction into place for any areas identified as non-compliant. The applicant states that its plan includes staff education, implementing processes and other necessary corrections, auditing and, and tracking audits until compliance is achieved. Moments assures that each of its'

locations are also part of an ongoing QAPI program, as described earlier in this application.

Moments states it believes that patients deserve to have their plan managed symptoms, symptoms controlled, treatment preferences honored, and beliefs and values discussed. Further to ensure this, Moments has hired Quality Review and Education RNs that review documentation and provide one on one education and group training. Moments states that it also works with The Healthcare Programs, which allows staff to receive and review performance improvement data in real time and compare performance with state and national averages. The applicant shares it believes this benchmarking tool helps Moments leadership customize the performance improvement plans and projects to address any emerging concerns and optimize patient care.

- 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.**

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.

Citadel Healthcare LLC (CON application #10657):

Capital Requirements and Funding:

On Schedule 2, the applicant indicates capital projects totaling \$441,254, which consists of the CON currently under review and office equipment and contingency funding. The applicant indicates on Schedule 3 of its application that funding for the project will be by cash

on hand. With \$1,000,000 in cash reported on the April 22, 2021 audit report, the applicant has sufficient resources to fund this project and all capital expenditures. The applicant has sufficient resources to fund this project.

Conclusion:

Funding for this project and the entire capital budget should be available as needed.

Continuum Care of Miami Dade LLC (CON application #10658):

Capital Requirements and Funding:

On Schedule 2, the applicant indicates capital projects totaling \$381,340, which consists of the CON currently under review and non-specified 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 reported on the December 31, 2020 audit report, the applicant has sufficient resources to fund this project and all capital expenditures. Additionally, the applicant provided a letter from the managing member pledging an account with an excess of \$4,000,000 and a trust fund with an excess of \$20,000,000.

Conclusion:

Funding for this project and the entire capital budget should be available as needed.

Moments Hospice of Miami, LLC (CON application #10659):

Capital Requirements and Funding:

On Schedule 2, the applicant indicates capital projects totaling \$529,276, which consists of 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 \$650,000 in cash reported on the March 31, 2021 audit report, the applicant has sufficient resources to fund this project.

Conclusion:

Funding for this project should be available as needed.

d. What is the immediate and long-term financial feasibility of the proposal? ss. 408.035 (6), Florida Statutes

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

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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.

Citadel Healthcare LLC (CON application #10657):

CON 10657	Citadel Healthcare LLC				
Miami-Dade	Wage Component	Wage Index	Adjusted Wage Amount	Unadjusted Component	Payment Rate
Base Rate Calculation					
Routine Home Care 1-60 days	\$133.81	0.9489	\$126.97	\$60.94	\$187.91
Routine Home Care 61+ days	\$105.76	0.9489	\$100.36	\$48.16	\$148.52
Continuous Home Care	\$959.31	0.9489	\$910.29	\$436.86	\$1,347.15
Inpatient Respite	\$256.46	0.9489	\$243.35	\$217.33	\$460.68
General Inpatient	\$653.70	0.9489	\$620.30	\$367.55	\$987.85
Year Two Comparison	Inflation Factor Year Two	Inflation Adjusted Payment Rate	Schedule 7 Revenue Year Two	Continuous Service Hours Provided	Calculated Patient Days
Routine Home Care 1-60 days	1.086	\$204.07	\$2,612,268		12,801
Routine Home Care 61+ days	1.086	\$161.29	\$4,395,093		27,250
Continuous Home Care	1.086	\$1,463.00	\$302,883	24	207
Inpatient Respite	1.086	\$500.30	\$196,815		393
General Inpatient	1.086	\$1,072.80	\$665,325		620
		Total	\$8,172,384		41,271
			Days from Schedule 7		38,340
			Difference		-2,931
			Percentage Difference		-7.65%

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As such, the applicant’s projected patient days are 7.65 percent or 2,931 days less than the number of patient days calculated by staff. Operating profits from this project are expected to increase from an operating loss \$352,831 in year one to a net gain of \$628,991 in year two.

Conclusion:

This project appears to be financially feasible, although patient days, and thus revenue, may be understated.

Continuum Care of Miami Dade LLC (CON application #10658):

CON 10658	Continuum Care of Miami Dade LLC				
Miami Dade Base Rate Calculation	Wage Component	Wage Index	Adjusted Wage Amount	Unadjusted Component	Payment Rate
Routine Home Care 1-60 days	\$133.81	0.9489	\$126.97	\$60.94	\$187.91
Routine Home Care 61+ days	\$105.76	0.9489	\$100.36	\$48.16	\$148.52
Continuous Home Care	\$959.31	0.9489	\$910.29	\$436.86	\$1,347.15
Inpatient Respite	\$256.46	0.9489	\$243.35	\$217.33	\$460.68
General Inpatient	\$653.70	0.9489	\$620.30	\$367.55	\$987.85
Year Two Comparison	Inflation Factor Year Two	Inflation Adjusted Payment Rate	Schedule 7 Revenue Year Two	Continuous Service Hours Provided	Calculated Patient Days
Routine Home Care 1-60 days	1.079	\$202.68	\$3,624,869		17,885
Routine Home Care 61+ days	1.079	\$160.19	\$3,624,869		22,629
Continuous Home Care	1.079	\$1,453.00	\$71,039	24	49
Inpatient Respite	1.079	\$496.88	\$73,957		149
General Inpatient	1.079	\$1,065.47	\$166,436		156
		Total	\$7,561,170		40,868
			Days from Schedule 7		40,320
			Difference		-548
			Percentage Difference		-1.36%

As such, the applicant’s projected patient days are 1.36 percent or 548 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 \$648,290 in year one to a net gain of \$383,550 in year two.

Conclusion:

This project appears to be financially feasible, although patient days, and thus revenue, may be overstated.

Moments Hospice of Miami, LLC (CON application #10659):

CON 10659	Moments Hospice of Miami, LLC				
Miami-Dade	Wage Component	Wage Index	Adjusted Wage Amount	Unadjusted Component	Payment Rate
Base Rate Calculation					
Routine Home Care 1-60 days	\$133.81	0.9489	\$126.97	\$60.94	\$187.91
Routine Home Care 61+ days	\$105.76	0.9489	\$100.36	\$48.16	\$148.52
Continuous Home Care	\$959.31	0.9489	\$910.29	\$436.86	\$1,347.15
Inpatient Respite	\$256.46	0.9489	\$243.35	\$217.33	\$460.68
General Inpatient	\$653.70	0.9489	\$620.30	\$367.55	\$987.85
Year Two Comparison	Inflation Factor Year Two	Inflation Adjusted Payment Rate	Schedule 7 Revenue Year Two	Continuous Service Hours Provided	Calculated Patient Days
Routine Home Care 1-60 days	1.076	\$202.23	\$5,983,779		29,589
Routine Home Care 61+ days	1.076	\$159.83	\$1,013,137		6,339
Continuous Home Care	1.076	\$1,449.80	\$696,428	24	480
Inpatient Respite	1.076	\$495.79	\$84,923		171
General Inpatient	1.076	\$1,063.12	\$696,428		655
		Total	\$8,474,695		37,234
			Days from Schedule 7		38,423
			Difference		1,189
			Percentage Difference		3.09%

As such, the applicant’s projected patient days are 3.09 percent or 1,189 days more than the number of patient days calculated by staff. Operating profits from this project are expected to increase from an operating loss of \$80,307 in year one to an operating profit of \$600,903 in year two.

Conclusion:

This project appears to be financially feasible, although patient days, and thus revenue, may be overstated.

- e. Will the proposed project foster competition to promote quality and cost-effectiveness? ss. 408.035(5) and (7), Florida Statutes.**

Applies to **all 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 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.**

The applicants are proposing new hospice programs which do involve construction costs and methods.

- 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 would not impose a charity care or Medicaid patient day condition on an applicant.

Citadel Healthcare LLC (CON application #10657) commits to 4.5 percent to Medicaid/Uncompensated care. Citadel notes that it set aside two percent for free/charity care. The applicant contends it intends to commit to \$100,000 to its educational outreach program over several years. The applicant did not address its history of providing Medicaid and charity care.

Continuum Care of Miami Dade LLC (CON application #10658) on average provides approximately 3.5 percent patient days for charity patients and an additional two percent for Medicaid patients. Continuum indicates that 2.0 percent of total patient days in both years one and two of the project will be Medicaid payors and 3.5 percent in both years charity patients.

Moments Hospice of Miami, LLC (CON application #10659) indicates that in 2019 Medicaid and charity care accounted for approximately 10 percent of the total patient days in Moments' hospice programs. The applicant's Schedule 7A shows Medicaid will account for 6.9 percent of patient days and charity care 6.1 percent of patient days in year one and 7.0 Medicaid and 5.0 charity in year two.

F. SUMMARY

The co-batched applicants' proposed projects are in response to the fixed need pool for a new hospice in SA 11.

Citadel Healthcare LLC (CON application #10657) is a for-profit newly formed entity whose ultimate parent is B & B Holding Enterprises Inc.

The applicant proposes \$416,254 in total project costs.

Pursuant to project approval, Citadel Healthcare LLC offers a total of 19 Schedule C conditions.

Citadel Healthcare LLC, in summary, commits to remedy/address the following unmet hospice need in SA 11 including, but not limited to:

- Opening two offices, with the anticipation of an additional one or two in the future.
- Employing bi-lingual staff, volunteers, forms, and literature
- Becoming CHAP, ACHC or JCAHO accredited within the second year.
- Implementing educational outreach program for Hispanic, African American homeless, and religious persons
- Educational programs for their staff, patients, and community, offering reimbursements to staff obtaining Hospice Certification.
- Volunteer programs including "Vigil service."
- Internship with the use of local universities, colleges, and technical schools
- Alternative therapies
- Implementing specific programs and outreach for non-cancerous patients
- Establishing a community advisory committee to represent the area.

Continuum Care of Miami Dade LLC (CON application #10658) is a for-profit newly formed entity whose parent company is Continuum Care Hospice.

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The applicant proposes \$371,340 in total project costs.

Pursuant to project approval, Continuum Care of Miami Dade LLC offers a total of 10 Schedule C conditions.

In summary, Continuum Care of Miami Dade LLC commits to remedy/address the following unmet hospice need in SA 11 including, but not limited to:

1. The applicant will implement its Virtual Reality Program upon licensure of its program. It will be made available to all eligible Continuum Miami-Dade patients.
2. 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 Continuum Miami-Dade patients.
3. The applicant will implement its Equine Therapy Program upon Medicare certification of its program. It will be made available to all eligible Continuum Miami-Dade patients who are physically able to make the trip to the stable partner.
4. The applicant will implement a minority outreach program for the Black and Hispanic population assembling an appropriate care team for assessment and treatment of this population.
5. The applicant will become accredited by CHAP once certified.
6. The applicant will assure each patient has five to seven Home Health Aide visits per week, provided this is acceptable to the IDT, patient and family.
7. The applicant will assure each patient has a minimum of two RN visits per week, provided this is acceptable to the IDT, patient and family.
8. The applicant will seek to respond to all its 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.
9. The applicant will implement its Continuum Palliative Resources program within six months of receiving its Medicare certification.
10. The applicant will implement its Veterans outreach program, We Honor Veterans, once certified.

Moments Hospice of Miami, LLC (CON application #10659) is a for-profit newly formed entity and an affiliate of Guardian Hospice NM LLC and Affiliates d/b/a Moments Hospice.

The applicant proposes \$529,276 in total project costs.

Pursuant to project approval, Moments Hospice of Miami, LLC offers a total of 27 Schedule C conditions.

Moments Hospice of Miami, LLC indicates it will remedy/address the following unmet hospice need in SA 11 including, but not limited to:

- Residents with a Cause of Death other than Cancer
- Residents in Nursing Homes
- Residents Needing Open access
 - Patients without DNR Orders
 - Patients with Expensive Medications or Treatments
- Residents with Cultural Barriers to Accessing Hospice: Hispanic, Black and LGBTQIA+ Residents

The applicant commits to the following to remedy and address these unmet needs:

1. Open Access Program
2. Provide Initial Moments Program
3. Provide Final Moments Program
4. Specialty Clinical Programs
5. Charity Care
6. Inclusion & Access Advisory Committees and Subcommittees
7. Maximizing Geographic Access through Office Locations and Staff
8. Mobile Education Unit
9. Program to Support District 11's Hispanic Population
10. Clinic Liaison Program
11. National Institute for Jewish Hospice
12. LGBTQIA+ Inclusion Program
13. Assisted Living Facility (ALF) Outreach
14. Hospice Services to District 11's Homeless Residents
15. We Honor Veterans
16. Partnership with Children's Bereavement Center
17. Rapid CHAP Accreditation and Medicaid Program
18. Obtain CHAP Palliative Care Accreditation
19. Staff Education & Training
20. Compliance Hotline
21. High-Quality Care through Staffing, Responsiveness, and Dedicated Quality of Life Funds for Patients and Families
22. Programs and Services beyond Standard Hospice Benefit

CON Action Numbers: 10657, 10658 & 10659

23. Enterprise Fleet Car Lease Program
24. Annual Food Drives
25. Miami Dade Chamber of Commerce Membership
26. Applicant Will Not Solicit Donations
27. Moments Employee to Manager and Monitor Condition Compliance

Quality of Care:

Citadel Healthcare LLC (CON application #10657) commits to develop a Quality Assurance Performance Improvement Plan that will be implemented in Miami-Dade and Monroe Counties and that the results of Med-Care Hospice Services' performance improvement process will be utilized to improve the quality of care and patient safety. These will be used to address any problem issues that may arise and will be incorporated into program planning, process design and modifications.

Continuum Care of Miami Dade LLC (CON application #10658) commits to develop and maintain its Quality Assurance Performance Improvement Plan similar to those that are already utilized by its affiliated programs.

Moments Hospice of Miami, LLC (CON application #10659) commits to develop and maintain a Quality Assurance Performance Improvement Plan similar to those that are already utilized by its affiliated programs.

Financial Feasibility/Availability of Funds:

Citadel Healthcare LLC (CON application #10657): Funding for this project and the entire capital budget should be available as needed.

This project appears to be financially feasible, although patient days, and thus revenue, may be understated.

Continuum Care of Miami Dade LLC (CON application #10658): Funding for this project and the entire capital budget should be available as needed.

This project appears to be financially feasible, although patient days, and thus revenue, may be overstated.

CON Action Numbers: 10657, 10658 & 10659

Moments Hospice of Miami, LLC (CON application #10659):

Funding for this project should be available as needed.

This project appears to be financially feasible, although patient days, and thus revenue, may be overstated.

ALL applicants: Strictly, from a financial perspective, this project will not have a material impact on price-based competition.

Medicaid/Indigent/Charity Care:

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.

Citadel Healthcare LLC (CON application #10657) commits to 4.5 percent to Medicaid/Uncompensated care. Citadel notes that it set aside two percent for free/charity care. The applicant contends it intends to commit to \$100,000 to its educational outreach program over several years.

Continuum Care of Miami Dade LLC (CON application #10658) on average provides approximately 3.5 percent patient days for charity patients and an additional two percent for Medicaid patients. Continuum indicates that 2.0 percent of total patient days in both years one and two of the project will be Medicaid Payors and 3.5 percent in both years charity patients.

Moments Hospice of Miami, LLC (CON application #10659) indicates that in 2019 Medicaid and charity care accounted for approximately 10 percent of the total patient days in Moments' hospice programs. Schedule 7A indicates Medicaid will be 6.9 seven percent and charity care 6.1 percent of year one's total patient days and in year two Medicaid will be seven percent and charity 5.0 percent.

G. RECOMMENDATION

Approve CON #10658 to establish a new hospice program in Service Area 11. The total project cost is \$371,340.

CON Action Numbers: 10657, 10658 & 10659

CONDITIONS:

1. The Applicant will implement its Virtual Reality Program upon licensure of its program. It will be made available to all eligible Continuum Miami Dade patients.
2. 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 Continuum Miami Dade patients.
3. The Applicant will implement its Equine Therapy Program upon Medicare certification of its program. It will be made available to all eligible Continuum Miami Dade patients who are physically able to make the trip to the stable partner.
4. The Applicant will implement a minority outreach program for the Black and Hispanic population assembling an appropriate care team for assessment and treatment of this population.
5. The Applicant will become accredited by CHAP once certified.
6. 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.
7. 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.
8. The Applicant will seek to respond to all its 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.
9. The Applicant will implement its Continuum Palliative Resources program within six months of receiving its Medicare certification.
10. The Applicant will implement its Veterans outreach program, We Honor Veterans, once certified.

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: _____

James B. McLemore
Operations and Management Consultant Manager
Certificate of Need