

STATE AGENCY ACTION REPORT
ON APPLICATION FOR CERTIFICATE OF NEED

A. PROJECT IDENTIFICATION

1. Applicant/CON Action Number

AMOR Hospice Care, LLC/CON application #10786

18670 Graphics Drive, Suite 200
Tinley Park, Illinois 60477

Authorized Representative: Bryan Niehaus
(708) 478-7030

Arc Hospice of Florida, LLC/CON application #10787

100 Challenger Road, Suite 105
Ridgefield Park, New Jersey 07660

Authorized Representative: David Glick
(917) 647-1536

Bonita Springs Healthcare Services, LLC/CON application #10788

8545 Monterey Road
Gilroy, California 95020

Authorized Representative: S. Mamoona Omer, MD
(408) 848-1114

Bristol Hospice – South Florida, LLC/CON application #10789

206 North 2100 West. Ste 202
Salt Lake City, Utah 84116

Authorized Representative: Troy Backus
(801) 325-0149

Charis Healthcare Holdings, LLC/CON application #10790

6001 Broken Sound Parkway, suite 220
Boca Raton, Florida 33487

Authorized Representative: Christine Blanch
(941) 400-2847

CON Action Numbers: 10786 through 10792

Moments Hospice of Broward, LLC/CON application #10791

820 Lilac Drive North, Suite 210
Golden Valley, MN 55542

Authorized Representative: Sol Miller
(763) 205-3600

Parkside Hospice and Palliative Care, LLC/CON application #10792

4800 North Hob Hill
Sunrise, FL 33351

Authorized Representative: Kalman Jacobowitz
(347) 409-1106

2. Service District/Subdistrict

Service Area (SA) 10 Broward County

B. PUBLIC HEARING

No public hearing was requested or held.

Letters of Support

AMOR Hospice Care, LLC (CON application #10786) provides 143 letters of support These letters include:

- **Government Officials and Community Leaders:**
 - Alex Rizo, Representative District 112
 - Juan Carlos Porras, Representative, District 119
 - Jesus Tundidor, Council President, City of Hialeah
 - René Garcia, Senator, Board of County Commissioners, District 13
 - Rafael Pineyro, Councilman, City of Doral
 - Kevin Marion Cabrera, Commissioner, Miami-Dade County
 - Margaret Brown, Mayor, City of Weston
 - Esteban Bovo, Jr., Mayor, City of Hialeah
 - Christi Fraga, Mayor, City of Doral
 - Dr. Francesco Iacona, CEO of Schiller Americas/Chairman of the Board Huboio Health Foundation
 - Mario E. Tapia, President and CEO, Latino Center on Aging
 - Alexis Pulido, Americas Community Center
 - Fabio A. Andrade, Founder and Directory, Colombia Habla US
 - Olga Arcila, Founder, Fundacio Caminando Con Olga

CON Action Numbers: 10786 through 10792

- Daniel Espino, Vice Chair, Miami-Dade Public School Board
- Mary Blanco, Member, Miami-Dade County School Board
- **Healthcare providers**
 - Ana Bovo, Chief Executive Officer, Southern Winds Hospital
 - Juan Carlos Echandia, CEO, Keralty Hospital
 - Juan Carlos Rondon, M.D., P.A., Medical Director, JCR Physicians Group
 - Oscar Mendez, M.D., Mendez Medical Center
 - Asgar Hosein, Dr., Director, Florida Health Institute
 - Ryan C. Verxagio O.D., Mobile Vision Doctors Vision Doctors Group, LLC
 - Ernesto Diaz, CEO, Florida Doctors Group
 - Lily Sirsy, BSc., Head of Physician Liaison Services, FAU Academic Practice Clinics
 - Yvette Fletcher-Prince, MD, DNP, APRN, Medix Urgent Care Center
 - Martin Santiago, MD, Parkland, FL
 - Davis Bass, DC., The Neck and Back Institute of Coral Springs
 - Ana Horozhankin, Patient & HHA Coordinator, Professional Home Health Services
 - Rebecca Cairo, Owner, Cairo Home Care-Broward
 - Silvia Solis, Access Coordinator, CareMax
 - Dean Guadagna, DO, CanoHealth
 - Ruben D. Felhandler, DPM
 - Albert Fernandez, DCSW, LCSW, PhD
 - Silvia Silva-Duluc, MD
 - Javier Ricardo, M.D., General Medicine
 - Wale Gisanrin, DC, Chiropractic Physician, Spectrum Wellness & Rehab
 - Luis Vicioso, MD
 - Alana Gibbings, APRN, MSN, BSN, Specialty Nurse at Memorial Healthcare System Broward County
 - Mehjabeen Shamji, BSN, RN, CCTC, Nursing Operations Manager at Cleveland Clinic Broward County
 - Odalys Figueroa, RN, Women's Center, Memorial Hospital, Broward
 - Ruby Contreas, RN, Medix Urgent Care Center
 - Patricia Perez, M.S.N., A.R.N.P., West Broward Internal Medicine
 - Nathalie Vachon, ARNP, NP-C, FNP-BC, Dr. G's Urgent Care
 - Armando Alba, RN, BSN, CNOR
 - Isis Fernandez, RN, BSN, NHA, MBA, Hialeah Shores Nursing and Rehab Center
 - Ketty Gaspar, Registered Nurse

CON Action Numbers: 10786 through 10792

- Jiji Simon, MSN, RN, Radiology Department, Memorial Hospital, Broward
- Scott Stark, Infusion Nurse, Memorial Hospital, Broward
- Ricardo Riveron, BSN, RN, Broward Health Hospital
- Braian Rodriguez, RN, Memorial Hospital, Broward County
- Oyedepo A. Oyetoro, BSN, NHA, Executive Director, Nspire Healthcare Lauderhill
- Lesther Guzman, Regional Director of Quality Control at Accent Care
- Arturo Zamboni, Administrator, Metropolitan Medical Centers
- Yaima, Sabatelo, Coordinator, Alliance Home Health of Broward
- Maridelys Mora Arias, Owner/Administrator Ivanhoe ALF, Inc.
- Mary Buchanan, Executive Director, Arbor Terrace Cooper City ALF
- Diego Castillo, HHA Coordinator, Affinity Home Care
- Clara Millan, Administrator, St. Boniface Gardens
- Jose E. Leal, Administrator, The Golden Years Adult Day Care
- Kella Garcia, Nurse Coordinator, We Love to Care
- Lewis Beyda, Owner, Sarah Care Adult Day Care Center
- Pilar Hinestrosa, Visions Health Systems, LLC
- Kathy Garcia, Administrator, Care and Love of Margate
- Patricia Sossa, Administrator, Blue Sky Home Healthcare
- Jeimmy Orozen, Administrator, Armonia Simetrica Rehabilitation
- Krista McAllister, HR Generalist, MaxiCare Select, INC Home Health Care
- Liza Erazo, Administrator, Star Multi Care Services
- Elsa Yanes, Administrator, Lovable Family Home Care
- Claudia Cortez, Administrator, Tamarac Senior Center
- Jose Dias, ALFA Diagnostics
- Andrea McKenzie, Benefit Coordinator, CanoHealth
- Gabriela Macoto, Margate Health & Rehabilitation Center
- Marissa Hylton, Administrator, Compassion First Home Health Services
- Jesika Polack, LNHA
- Adamaris Martinez, Case Manager, Hialeah Shores Nursing & Rehabilitation Center
- Ernesto Serrano, CMHP, Case Manager, Southern Winds Hospital
- Shirelle Cunigan, Risk Manager/Performance Improvement, Larkin Community Hospital Behavioral Health Services
- Amarilis Ramos, Administrator, Sunset Retirement Home, INC.
- Sandra Alvarado-Raymond, LMHC, Owner and Executive Manager, Plante Moving Forward Therapy & Coaching
- Steven Hess, President, Florida PACE Centers at Miami Jewish Health

CON Action Numbers: 10786 through 10792

- Fabianna Dangond, SFVT – Operations Manager
- Alfredo Stagg, CT Department Supervisor, Memorial Hospital, Broward
- Shazia Haq, Interventional Radiology Clinical Manager at memorial Hospital, Broward
- Lotta Siegel, ICU Director of Nursing, Memorial Hospital, Broward
- Keyla Cedeno, RN Clinical Manager, Interventional Radiology, Memorial Hospital, Broward
- Ernesto Diaz, CEO, VidaMax Medical Center
- Juan Sainz, MRI Technologist, Memorial Hospital, Broward
- Angeline Lourde, MRI Technologist, Memorial Hospital, Broward
- Tatiana Stark, MRI Technologist, Memorial Hospital, Broward
- Andrea Florian, MRI Technologist, Memorial Hospital, Broward
- Jose Pachon, Nuclear Medicine Technologist, Memorial Hospital, Broward
- Ana Martinez, Co-owner, VM Lab Technologies
- Preston Coffor, Office Manager, Doris. Ahawy, M.D., P.A.
- Stephanie Frankenouser, Office Manager, Bridget Silva, ME, FAAFP Family Medicine
- Evelyn Gonzalex, Office Manager, ALL VIP Care, INC
- Yady Mereno, Broward Marketing Manager, DHG Medical Centers
- Jaime Galvis, Market Development Manager, CareMax
- **Clergy**
 - Juan Rivas, Pastor, St. Andrew Catholic Church
 - Francisco Diaz, Pastor, St. Boniface Catholic Church
 - Jose Luis Gomes, and Maria Luisa Piraquive Pastors - Church of God Ministry of Jesus Christ International
 - Nilson Sanches, Pastor, Casa de El Buen
 - Andrew Pires, Pastor, Calvary Chapel Fort Lauderdale
 - Vanessa Gracia Cruz, Executive Pastor, Segadores de Vida
 - Alberto Prieto, Senior Pastor, King Jesus Ministries Broward
 - Marlene Joseph, Pastor, Amistad Movements Church
- **Local Businesses & 15 Residents (not listed)**
 - Alissa Garcia, Chief Financial Officer, National Health Transport
 - Michael Hill, Owner, Hill Auction Gallery
 - Rafael Flores, Owner, Pompano Supermarket
 - Nersy Zahreddine, Bombshell Blow Dry Bar
 - Diana Villafane, Owner, The Reading Cup Café
 - Ana Martinez, Owner, Viajando, LLC
 - Simon Santrich, CEO, Co-founder, Simon Santrich LLC
 - Andy Jean-Baptiste, Coordinator, YouFit/Silver Sneaker Program
 - Ettore Sabatella, Editor in Chief, Doral Family Journal

CON Action Numbers: 10786 through 10792

- Christian Diaz, CEO, All Staff Health Services, Inc.
- Gloria E. Delgado, MSW, CCM
- Maridelys Mora Arias, Owner, Family Oasis Nurse Registry, Inc. and Paradise Adult Daycare Center
- Michael Costa, Senior Consultant, Edge Benefits Consulting
- Mariela Fierro, Social Worker Support Coordinator
- Ruth De Los Santos, Health Insurance Counselor, Combined Insurance
- Maria Jose Ortiz, Director, Florida Health Institute in Pembroke Pines
- Marlene Joseph, Owner, M.J. Training School & Multi-Services
- Ghislaine Roulet, Owner, One Stop Health & Training Center
- Adam E. Miller, ESQ., Attorney/President, Miller Law Group
- Oscar Amuz, CEO, Autism Soccer Foundation

Arc Hospice of Florida, LLC (CON application #10787) provides 44 letters of support. These letters include:

• **Government Officials and Community Leaders:**

- Pam Beasley-Pittman, Commissioner District 3, City of Fort Lauderdale, FL
- Josh Levy, Mayor, City of Hollywood, FL
- Charlotte Mather-Taylor, Chief Executive Officer, Area Agency on Aging of Broward County
- Kim Praitano, President/CEO, Gild's Club South Florida
- Liron Ozery, Director of Broward County, Jewish National Fund USA
- Jennifer O'Flannery Anderson, Ph.D., President & CEO, Community Foundation of Broward
- Felipe Pinzon, President/CEO, Hispanic Unity of Florida
- Germaine Smith-Baugh, Ed. D, President and CEO, Advance Urban League of Broward County

• **Healthcare providers**

- Ken Angel, Administrator, Board of Nursing Home Administrators, Glades Wes Rehabilitation and Nursing Center
- Madeline Nafa, Chief Executive Officer, HCA Florida University Hospital
- Belkin Munoz, Director of Nursing, Glades West Rehabilitation Center
- Shalonda Morton, Administrator, Wilton Manor Health and Rehabilitation Center
- Dahealia Defoe, Administrator, The Residence at Pompano Beach ALF
- Barbara Yanez-Artiles, NHA, Administrator, Fort Lauderdale Health & Rehab

CON Action Numbers: 10786 through 10792

- Raphael Kintzer, CEO, Quantum Health Care Group (Willing to Contract)
- Rodrick L. Hurt, MD, Sound Physicians Transitional Care
- Rosalyn Frazier, Chief Executive Officer, Broward Community & Family Health Centers, Inc.
- Pari Deshmukh, MD, CEO and Medical Director, Balanced Wellbeing LLC
- Yochanon Klein, Rabbi, CEO, Healing Hearts Medical Support
- Steven Jeger, CEO, Physicians Dialysis
- David Rombro, CEO, Polaris Pharmacy Services
- Peter M. Antevy, M.D., EMS Medical Director
- Emmanuel I. Bahamonde, DO, Partner, North Beach Renal Care Associates
- Randy Colman, MS, MBA, President and CEO, Goodman Jewish Family Services of Broward County
- Elias Atri, MD
- Patricia Rooney, DO
- Orestes Mederos-Trujillo, MD, Internal Medicine
- Perry Stein MD, MBA
- Ronoel Penalver, MD, Family Medicine
- Farzanna S. Haffizulla, M.D, MACP FAMWA, Dr. Kiran C. Patel College of Osteopathic Medicine, Nova Southeastern University
- Nancy Klimas, MD, Chair, Department of Clinical Immunology, Director, Institute for Neuro-Immune Medicine, Assistant Dean for Research, Nova Southeastern University
- Stefanie La Manna, PhD, MPH, APRN, FNP-C, AGACNP-BC, Nova Southeastern University
- Michelle A. Clark, Ph.D., Dean, Nova Southeastern University
- Irving Rosenbaum, D.P.A., Ed. D., Vice President for Operations Health Professions Division, Nova Southeastern University
- Naushira Pandya, MD, CMD, FACP, Professor and Chair, Department of Geriatrics, Dr. Kiran C. Patel College of Osteopathic Medicine, Nova Southeastern University
- Karen S. Grosby, Ed. D, Dean, College of Psychology, Nova Southeastern University
- Marie Florent-Carre, D.O., M.P.H., Chair, Department of Rural and Urban Underserved Medicine, Associate Professor, Family Medicine and Public health, Dr. Kiran C. Patel College of Osteopathic Medicine
- **Clergy**
 - Michael J. Calderin, Reverend Father, MA, CAP, CMHP, GSC, Saint Jude Ministries, Inc.
 - Yosef Weinstock, Senior Rabbi, Young Israel of Hollywood – Ft. Lauderdale
 - David Spey, Rabbi, Temple Bat Yam of East Fort Lauderdale

CON Action Numbers: 10786 through 10792

- **Local Businesses & Residents**

- Angelina M. Gonzalez, Esq., Dickenson Wright, PLLC (Unsigned)
- Clifford A. Wolff, Esq., Wolff Law
- Christina Paradowski, Esq., Immigration Attorney
- Pamela M. Kane, Fort Lauderdale, FL

Bonita Springs Healthcare Services, LLC (CON application #10788) provides 158 letters of support. These letters include from the SA

- Khadija Ali, Margate Assisted Living, Margate, FL
- Afsheen Mustafa Khan, Business Owner
- Ayesha Arain, Attorney at Law
- Angelina Mager
- Farah Deeba, Owner, Beauty Café & Salon Boca
- Ali Amir, Resident of Broward County
- Debra Gomez, Business Owner
- Alexandra Sonchez, Business Owner
- Suleman Attawalla, Business Owner
- Amin Latif, Business Owner
- Eshaan Attawalla, Business Owner
- Salina Attawalla, Real Estate
- Ali Aftab, IT Professional
- Aftab Katia, Business Owner
- Arshad Mahmood, Business Owner
- Alexander Flyriy, Business Owner
- Kausar Chanda, Business Owner
- Saad Deeba, Business Owner
- Saima Amin, Business Owner
- Sara Haque, Business Owner
- Suitlana Youstatova, Business Owner

- **Hospitals/Nursing Homes**

- Nicole Scherzinger, Administrator, Palm Care Centre Nursing Home
- Mickerline Salomon, RN, Nicklaus Children's Hospital

- **Media**

- Mohammed Ali Khimani, President, Jubilee Venture 101 Inc.

- **Military Leaders, Base Commanders, Chaplains**

- Cathy Batton, Executive Director, United Nations Chaplains Association (Unsigned)

- **Physicians**

- Atif Khan, M.D., Broward County

- **Religious Leaders**

CON Action Numbers: 10786 through 10792

- Imran Bashir, Imam, Mosque Administration, Islamis Center of Coral Springs (ICCS)
- Unknown, Mosque Administration, Islamis Center of Coral Springs (ICCS)
- Unknown, Mosque Administration, Islamic Foundation of South Florida (ICGM) (MCA)
- Imran Bashir, Imam, Mosque Administration, Islamis Center of Broward (ICB)
- Suleman Khimani, Resident of Broward County
- Aarvinder Singh, Nurse Practitioner, President, Sikh Society of Florida
- Ramona Qumore, The Islamic Education School (TIES) Davie
- **Vendors: Pharmacy, DME, Oxygen, etc.**
 - Vanilla Skye, Vanilla Skye Medical Supply
 - Vivine Murroy, Broward County

Bristol Hospice – South Florida, LLC (CON application #10789)

provides 43 letters of support. These letters include:

- **Hospitals/Nursing Homes**
 - Evan Boyer, M.D., Chief of Surgery, Broward Health North Hospital
 - Bryanna Barris, Nurse Manager, HCA Florida Westside Hospital
 - Barbara Yanez Artiles, Administrator, Fort Lauderdale Health & Rehab
 - Belkin Munoz, Director of Nursing, Glades West Rehab
- **Assisted Living Facilities**
 - Enud Maisoret, Administrator, Caring Village of Margate
 - Viane Aloice, RN Unit Manager, Covenant Living of Florida
 - Demys Gonzalez, Owner/Administrator, Kendall Haven – ALF
 - Veronica Guerrero, Administrator, Golden Age Residences LLC
 - Steven Rule, Executive Director, Lenox on the Lake
 - Mika Swtonis, Director of Resident Care, Park Summit
- **Physicians**
 - Joseph J. Arena, M.D., Arena Medical Group
 - Nada Boskovic, Internal Medicine & Palliative Care Specialist
 - Francis E. Salazar, D.O., M.P.H., Medical Director, Hollywood Primary Care/Primary Care LLC
 - Neena Chandrasekaran, MD, South FL Pulmonary Partners LLC
 - Jeffrey P. Wallace, M.D., Hospice Medical Director
 - Corinne Gerhart, DO, HMDC, Hospice & Palliative Care Physician
 - Firaz R. Hosein, D.O., P.A., Hospice & Palliative Care
 - William V. Jensen, D.O., Primary Care Physician, MyCare Medical

CON Action Numbers: 10786 through 10792

- Narendra K. Maheshwari, MD
- Ashneal Sharma, D.O., Internal Medicine
- Scott Silverstein, D.O., Medical Director, Stephen Silverstein, D.O., and William V. Jensen, D.O., MyCare Medical
- **Business Leaders & Organizations**
 - Stephanie A. Zeverino, Zeverina Elder Care Solutions, (Consultant)
 - Cloyd Thomas, Jr., MBA, Regional Director of Operations, GastroHealth
 - Keith E. Gibson, Florida's Diversity, Equity and Inclusion Director, Alzheimer's Association
 - Catherine Wallace, MS, Regional Director, Florida Death with Dignity
 - Stephen Ferrante, Principal Partner, Group Victory (Consultant)
 - Saji Samuel, R.PH., Registered Pharmacist/Owner, MedWise Pharmacy & Easy Comfort, Inc.
 - Kellie Hoodiman, Sr. Funeral Director, Neptune Society
 - Four businesses outside of the SA.
- **Individuals**
 - Michael R. Milner, RADM, DHSc, PA-C, USPHS (Retired), Assistant US Surgeon General (Retired)
 - Margi Cross, Volunteer & Philanthropist
- **Clergy**
 - Anthony Manuel, Pastor, St. Ruth Church

Charis Healthcare Holdings, LLC (CON application #10790) provides 40 letters of support. These letters include:

- **Medical Professionals/Facilities**
 - Pablo Urbandt, M.D., F.A.C.C., Cardiology Consultants of West Broward, P.A.
 - Veronica S. Gipps, M.D., FAAPMR, Fort Lauderdale
 - Prangnuan Durand, D.O., P.A.
 - Richard R. Grosso, Jr., Administrator, Huber Calice, Admissions Director, Maggie Paez, Director of Business Development, The Pearl at Fort Lauderdale Rehabilitation & Nursing Center
 - Hillary S. Josephs, Community Relations, Independence Hall: A Golden Bell Community
 - Suzy A Corossuaur, Director of Sales and Marketing, Independence Hall: A Golden Bell Community
 - Saya Jorgensen, Regional Administrator, Independence Hall: A Golden Bell Community
 - Chadyne Bernard, DON, Independence Hall: A Golden Bell Community

CON Action Numbers: 10786 through 10792

- Madeline Mahoney, Independence Hall: A Golden Bell Community
- Mark E. Doyle, Healthcare/Hospital CEO
- Danielle Davault, RN, Regional Director of Nursing Haley Gill-Pressley, BSN, RN, Karly Zengel, Dr., Physical Therapist, Haven Home Health
- Taylor Himes, RN
- **Individuals**
 - Bernie and Marta Friedman, Fort Lauderdale
 - Twenty-one identical letters from individuals.
- **Businesses**
 - Thomas Sedgwick, Supply Chain Manager, OPSWAT, Inc.
 - Michelle Pressley, Office Manager, Sleuth Inc
 - Steven East, CEO, CaringOndemand

Moments Hospice of Broward, LLC (CON application #10791)
provides 187 letters of support from:

- **Hospitals**
 - Dr. Leunam J. Rodriguez, Medical Director, Baptist Health Doctors Hospital
 - Maria Cabrera, Director of Surgical Services, Baptist Health Doctors Hospital
 - Gino R Santorio FACHE MPA, President and CEO, Mount Sinai Medical Center
 - Jillian Steer, OT, Broward Health Coral Springs
 - Rosie Baugh, Clinical Director, Broward Health Imperial Point
 - Crystal Barnett, RN, Broward Health North
 - Christine Sabrel, Surgical Operations Endo, Cleveland Clinic
 - Fraysy Perez, Case Manager, Coral Gables Hospital
 - Patricia Garces Betancourt, LCM, Coral Gables Hospital
 - Arnel Macapagal, Case Management Director, Florida Medical Center
 - Josie Rivera-Abdo, Program Administrator, Pathology Residency Program, HCA Florida Northwest Hospital
 - Josie Rivera-Abdo, Program Administrator, Pathology Residency Program, HCA Florida Westside
 - Matt Hughes, CFO, HCA Florida Westside Hospital
 - Odette Dixon, RN, HCA Florida University Hospital
 - Michael B, OTR, HCA Florida Woodmont Hospital
 - Nicole Callahan, Social Worker, Holy Cross Hospital
 - Alicia Oakley, Lead Case Manager, Kindred Hospital South Florida
 - Sophia Scott, Larkin Community Hospital Behavioral Health Services

CON Action Numbers: 10786 through 10792

- Carlos Szajnert, MD, OBGYN, Memorial Hospital Miramar
- Chi Ogbenna, PharmD, Memorial Regional Hospital
- Shazad Asaf, RN, Memorial Regional Hospital South
- Brynokie D, Outpatient Coordinator, St. Anthony's Rehabilitation Hospital
- Tony Rivas, Director, Wound Care and Hyperbaric Oxygen Therapy, Steward Health Hialeah Hospital
- Tamila Perez, RN Case Manager, Westside Regional Hospital and Broward Medical Coral Springs
- **Nursing Homes**
 - Noah Zisquit, Administrator, Biscayne Health and Rehabilitation Center
 - Jason Reiz, Administrator, Hilcrest Health Care and Rehabilitation Center
 - Janet Dadia, Senior Administrator, Margate Health and Rehabilitation
 - Jesika Pollack, Administrator, Elevate Care Hialeah
 - Regan Sandhu, Administrator, Regents Park of Sunrise
 - Clifton Sainvil, Administrator, Golfcrest Nursing Center
 - Nicola Chandler Byam, Administrator, Tamarac Rehabilitation and Health Center
 - Richard Grosso, Jr., Administrator, The Pearl at Fort Lauderdale Rehabilitation and Nursing Center
 - Zev Shemesh, Administrator, West Broward Care Center and Healthcare Center
 - Erich Companioni, DNP, ARNP-BC, FNP, MBA, Director of Clinical Services, The Floridean Nursing and Rehabilitation Center
 - Micheal Osis, DON, Aspire at the Sea - Harbor Beach
 - Katie Mays, DON, Emerald Nursing and Rehabilitation Center
 - Sheeren Trenchfield, DON, The Savoy at Fort Lauderdale
 - Avery Williams, ADON, Seaview Nursing and Rehabilitation Center
 - Paula Calixte, DON, Nspire Healthcare
 - Kendra Stephens, Executive Director, Life Care Center at Inverrary
 - Donnett Howell-Henry, Director of Patient Care Services, Memorial Manor Skilled Nursing
 - Valerie Jones, Communications, Broward Nursing and Rehabilitation Center
 - Ephi Carney, Regional Director of Training and Operations, CareRite Centers
 - Kelly McCrater, Healthcare Navigator and Admissions Specialist, Covenant Living of Florida

CON Action Numbers: 10786 through 10792

- Doris Emile, ABOM, Deerfield Beach Health and Rehabilitation Center
- Tjierry Seignon, Marketing Director, Fort Lauderdale Health and Rehab
- C.H., Glades West Rehabilitation and Nursing Center
- Alan Markowitz, LNHA, Manager, Heritage Lakeside and Moorhead Rehabilitation & Healthcare Center
- Melrose Sas, RN, John Knox Village
- Oyedepo A. Oyetoro, RN, Nspire Healthcare
- Xochit Sotomayor, Social Services Director, Nspire Healthcare
- Venita Horstmann, Activity Director Certified / Director of Volunteer Services, Nspire Healthcare
- Alexander Vergara, Activities Coordinator, Nspire Healthcare
- Rachel Schuster, CEO, OnyxHealth
- Ian Trenchfield, ED, Plantation Nursing and Rehab
- Kelsea August, Plantation Nursing and Rehab
- Debra Ara, Pompano Health and Rehabilitation Center
- Judy E., Solaris Healthcare Coconut Creek
- Lorna Davis, RN, Springtree Rehabilitation and Health Center
- Irene F, Activities Director, St. Johns Nursing Center
- E.E., Sunrise Health and Rehabilitation Center
- Steven Segal, Regional Director of Operations and Business Development, Superior Healthcare Management
- A.J. Speede, Director of Business Development, The Lilac at Silver Palms
- Kiara Green, The Pearl at Fort Lauderdale Rehabilitation and Nursing Center
- Daniel Pierre, MD, Wilton Manors Health and Rehabilitation Center
- **Assisted Living Facilities**
 - Sandra Bennett, Administrator, Aspire at the Abbey's Caring Residence
 - Enid Maisonet, Administrator, Caring Village of Davie
 - Ruth Chaney, Administrator, Coral Plaza by RSR
 - Mykelle Henery, Administrator, Covenant Living of Florida
 - Merle J. Arthur, Administrator, Homecare Villa, Inc.
 - Yvonne Johnson, Owner, and Tia Brown, Administrator, Havencrest Assisted Living
 - Clinton Thompson, Owner/Administrator, Hope Garden Assisted Living
 - Alea Alimonahmuednny, Owner/Administrator, Alea Assisted Living
 - Alina Zembron, Owner/Administrator, Atlantic Shore Retirement Residence

CON Action Numbers: 10786 through 10792

- Bridgette Simp, Owner/Administrator, Bridgepointe Assisted Living
- Yvonne Jubilee, Owner and Administrator, Jubilee Assisted Living
- Petrina Mattis, Owner and Administrator, Coral Springs Country Club for Seniors
- Tafari Clark, Executive Director, Active Senior Living Tamarac
- Michael Graham, Executive Director, Brookdale Deer Creek
- Mackenzie Gayle, Executive Director, Cherry Oak Senior Living
- Tamika Arnasalam, Executive Director, HarborChase of Tamarac
- Linda Harmon, Director of Social Services, Covenant Living of Florida
- Jennifer Brooks, Director of Nursing, Assisted Living Facilities in Broward County
- Steven Rule, Executive Director, Lenox on the Lake
- Victoria Valdez, DON, Lenox on the Lake
- Faith Williams, Owner, Living by Faith Assisted Living
- Tonee Muenzhuber, Director, Meadow Lakes Senior Living
- Michael Rozenberg, Administrator, Mi Casa Senior Living
- Mundi Home Assisted Living, Mary Alonso, Administrator
- Lorna Bushay, Director of Resident Care, Oakmonte Village of Davie
- Carol McKinney, Director of Nursing, Oasis Living Quarters
- Maggie Cardenas-Drury, Executive Director, Oasis Living Quarters
- Stephanie McGhee, Resident Services Director, Pacifica Senior Living in Sunrise
- Michael Cherill, Administrator, Paradise Manor Assisted Living
- Campbell F. Epes III, Executive Director, Park Summit at Coral Springs
- Gary Lindenberger, Residence at Dania Beach
- Dahealia Defoe, Executive Director, Residence at Pompano Beach
- Delmar Garcia, Owner & Administrator, Stellar ALF II
- Sean Reece, Administrator, Sunny Days Assisted Living
- Susan Snyder, Executive Director, The Belmont Village Senior Living
- Carlos Oritz, Director of Sales and Marketing, The Court at Palm Aire
- Keith Litman, Executive Director, The International at Aventura
- Lisette Valdes-Brito, Executive Director, The Oasis at Coral Reef
- Alexa Townsend, Director of Wellness, The Peninsula Assisted Living and Memory Care
- Debbie Korman, Administrator, Victoria Villa Assisted Living
- Laura Johnson, AL Manager, Westchester of Sunrise

CON Action Numbers: 10786 through 10792

- C. Headley, Health and Wellness Director, Wickshire Tamarac
- Madeline Mahoney, Director of Nursing, Williamsburg Landing Assisted Living
- Alex Sarmiento, Chief Operating Officer, Royal Senior Care
- **Veterans**
 - Betty Chin Sue, Social Services Director, Alexander Nininger State Veterans Nursing Home
 - Michoel Dupont, Veteran, Hollywood VA Clinic
 - Veteran, Pembroke Pines VA Clinic
 - William Watts, Veteran Advocate
 - Veteran, William Kling Department of Veterans Affairs Outpatient Clinic
- **Clinics/Providers**
 - Erika Gonzalez, Regional Nurse, 24/7 Home Healthcare Agency
 - Dr. Pedro Albite, Doctor, Albite & Fernandez MDs
 - Dagoberto Castex, Owner and Administrator, Assisting Hands Miami Beach
 - Jesse Glueck, Chief Medical Officer, Beeper MD
 - Manny Sanchez, CEO, Bless Medical Center
 - Coleen Howard, Administrator, Broward Community Medical Center
 - Carlos de Solo, CEO, CareMax Medical Centers
 - Ivette Chinigo, Owner and Administrator, Care-Tech Home Health Services Dade & Broward
 - Jane Anderson, RN, Cascade Creek Memory Care
 - Celia M. Lozano, RN Case Manager, Cigna
 - Dr. Jose Suarez, Chief Medical Doctor, Clinical Care Medical Centers
 - Dai Altieri, Vice President of Medical Management, Clinical Care Medical Centers
 - Norman Suer, Administrator, Conviva Care Center
 - Dr. Pedro C. Roig, Internal Medicine, Doctor Internal Medicine
 - Dr. Rafael Hernandez, Specialist in Geriatrics, Domus Care Solutions
 - Jeslene Somohano, CEO and Licensed Health Ins. Agent, Ensure Health Agency, LLC
 - Ernesto Diaz, CEO, Florida Doctors Group
 - Dr. Manuel Garcia Estrada, Nephrologist, Garcia Estrada Medical
 - Henry Cusnir, Medical Director (Plantation), HCA Florida Healthcare
 - Dr. Luis Del Prado, Doctor (Hialeah and Miami) (Located outside of the SA)
 - Eileen Fernandez, Office Manager, Innovative Care Inc
 - Dr. Lauren Dabakaroff, Physician and Surgeon, LMD Podiatry

CON Action Numbers: 10786 through 10792

- DR JACOBO ELGOZY, DO, Dr, Maimonides Medical Center
- Dr. Manuel Garcia Frangie, Doctor/Internal Medicine
- Zuleydis Hernandez, Administrator, MAS Health Centers
- Jose A. Vergara, ARNP, Miami Primary Healthcare
- Yehuda Deutsch, MD, Moffitt
- Dr. Cesar A. Rodriguez, Medical Director, Moments Hospice
- Lisandra Canetti, Social Worker and Care Coordinator, Optum Wellmed
- Magda Camoamor, Senior Physician Marketing Consultant, Optum Wellmed
- Dr. Valentin Estrada, Medicine Specialist, Pasteur Medical
- Mayret Padron, Physician Assistant
- Steve Baker, RPh, Chief Operating Officer, Polaris Pharmacy Services
- Neil Mayo, Vice President of Sales, Senior Nannies
- Stephanie Huston, Home Health Representative, Trilogy Home Healthcare
- Dr. Giezy Sardinias, Medical Director (Overall), TruCare Medical Group
- Dr. Carlos A Lopez, Medical Director (Plantation), TruCare Medical Group
- Manuel Gonzalez, Medical Director, Vidamax Medical Center
- Victor M Yoga, Owner/President, IV MED SERVICES LLC
- **Jewish Organizations**
 - David Smith, President, B'nai Aviv Synagogue
 - Rabbi Mendel Levy, Chabad Chaplaincy Network International
 - Rabbi Yankie Denburg, Chabad Jewish Center
 - Rabbi Yossi Gansburg, Chabad Lubavitch Of Coconut Creek & W Pompano Beach
 - Ari Goodman, Rabbi/Director, Chabad of Monterra
 - Rabbi Yochanon Klein, Founder, Healing Hearts
 - Natalie Herradon, LMHC, Director of Case Management Services, Jewish Community Services of South Florida
 - Rabbi Young, National Institute for Jewish Hospice
 - Yisroel Merkin, Director of Organizational Advancement the Aleph Institute, Rofeh Cholim Cancer Society (RCCS)
 - Richard Silverstein, Freelance Contributor, Rofeh Cholim Cancer Society (RCCS)
 - Yerucham Kopelman, Founder, The Neshama Foundation
 - Sholom Volk, CEO, Tomchei Shabbos of Florida Corp
 - Rabbi Shalom Meir Holzkenner, YJP Las Olas
- **Organizations:**
 - Starr Block, MS, BSN, RN, Heart Failure Certification, American Heart Association
 - Craig Herman, MD, Clinical Research Center of Florida

CON Action Numbers: 10786 through 10792

- Debra Albo-Steiger, LCSW and CEO, Children's Bereavement Center. Children's Support Services
- Richard Kelly, COO, Make a Wish
- **Community Organizations:**
 - Gina Baptiste, Director, The Senior Care Foundation
 - Christy Bork, National Program Manager, Pet Peace of Mind
- **Business and Professional Services:**
 - Howard Scheiner, President, Mediation Group
 - Marc Halpert, Chief Operating Officer, Monarch Healthcare Management
 - Jason Banks, Vice President, nVoq, Inc.
 - Sudeep Pisipaty, Head of Commercial Strategy & VP, Health Recovery Solutions
- **Other:**
 - Jacob Blass, Client, Ethical Advocate
 - Elliott Wood, CEO, Medalogix
- **Government Officials**
 - Christi Fraga, Mayor of Doral City
 - Digna E. Cabral, Councilwoman, City of Doral
 - Rafael Pineyro, Councilman, City of Doral
 - Scott Gavin, Councilman, City of North Miami

Parkside Hospice and Palliative Care, LLC (CON application #10792)

provides seven letters of support. These letters include:

- Hazelle Rogers, OD., Commissioner, Broward County District 9
- Patricia Johnson, Assistant Director of Nursing MSN, RN
- Medhat Awad, M.D., P.A., Internal Medicine
- Lorna Osborne, President, Ocean One – Home Health Agency
- MaryLynn Magar
- Moskowitz Legal Group
- Anthony P. Ruberg, Partner/Senior Managing Director, VIUM Capital, LLC, (Located outside the SA.)

C. PROJECT SUMMARY

The applicants propose to establish a new hospice program in SA 10 in response to the published need.

AMOR Hospice Care, LLC (CON application #10786), also referenced as AMOR Hospice or the applicant, is a newly formed for profit entity established in Florida on February 9, 2024, and is owned by Ms. Odelmys Bello.

CON Action Numbers: 10786 through 10792

The applicant expects issuance of license in July 2025, and initiation of service July 2025.

The applicant proposes \$518,811 in total project costs, including equipment, project development, and start-up costs.

Pursuant to project approval, AMOR Hospice offers the following 20 Schedule C conditions:

Commitment to Culturally Competent Care Development

- **NEED:** Broward County is one of the most ethnically and racially diverse regions in the State of Florida. Broward County's significant Hispanic and Black demographics are themselves composed of myriad of ethnicities, nationalities, and cultures representing a collage of perspectives on death, dying, and perception on hospice care. As evidenced by research, to effectively reach, serve, and thrive within this community, a hospice program must have a strong foundation of culturally competent service skills.
- **COMMITMENT:** AMOR Hospice commits to providing every employee external training by the Cross Cultural Health Care Program (CCHCP), setting aside \$10,000 for annual training over the first two years of the program initiation based on quotes obtained from CCHCP.
- **MEASURE:** AMOR Hospice will document its CCHCP contracts and employee completion of the courses. AMOR Hospice will provide evidence as part of its annual report over the first two years to AHCA.

- **NEED:** Broward County is one of the most ethnically and racially diverse regions in the State of Florida. Broward County's significant Hispanic and Black demographics are themselves composed of myriad of ethnicities, nationalities, and cultures – representing a collage of perspectives on death, dying, and perception on hospice care. As evidenced by research, to effectively reach, serve, and thrive within this community, a hospice program must have a strong foundation of culturally competent service skills.
- **COMMITMENT:** AMOR hospice commits to developing internal competencies through the CCHCP Train the Trainer (TOT) program. AMOR is dedicating \$5,000 to this initiative based on the quotes from CCHCP to cover its [sic] first two years of operation.
- **MEASURE:** AMOR Hospice will document its CCHCP contracts and employee completion of the courses. AMOR Hospice will provide evidence as part of its annual report over the first two years to AHCA.

- **NEED:** As with the need for culturally competent care amongst various ethnic and racial backgrounds, the veteran population and their families present unique needs for end-of-life and hospice care.

CON Action Numbers: 10786 through 10792

- **COMMITMENT:** AMOR Hospice will actively seek We Honor Veterans status once operational and we will progress through each level as rapidly as possible to reflect our belief in the importance and unique needs of hospice care for our veterans. AMOR Hospice will advocate for Veteran patients to participate in Honor Flight for Veterans. The provider will also actively recruit Veteran volunteers to better support Veteran patients.
- **MEASURE:** AMOR Hospice will provide a written report within the annual report to AHCA that documents the presence of an active We Honor Veterans program within the first 12 months of the hospice program's operation. The report will include the number of Veteran patients served and staff resources dedicated to the program.
- **NEED:** As a significant population in Broward County, the Jewish population and their families present diverse needs for hospice care in a dignified manner that is consistent with Jewish heritage and values.
- **COMMITMENT:** AMOR Hospice will actively seek National Institute for Jewish Hospice (NIJH) certification once operational through their available training and certification platform. AMOR Hospice is setting aside \$5,000 for accreditation costs.
- **MEASURE:** AMOR Hospice will provide a written report within the annual report to AHCA that documents the progress of AMOR Hospice is seeking and obtaining the National Institute for Jewish Hospice (NIJH) certification.
- **NEED:** Broward has more same-sex couples or households than any other county in Florida. As the community and LGBTQ+ population continue to grow, age, and require hospice care, the population will require that their unique needs are understood by health care providers. When surveyed, 9 out of 10 LGBTQ+ people feared discrimination in care settings if providers knew their sexual orientation or gender identity.
- **COMMITMENT:** AMOR Hospice will actively seek SageCare for LGBTQ+ Aging Cultural Competency certification once operational through their available training and certification platform. AMOR Hospice is setting aside \$5,000 for certification costs.
- **MEASURE:** AMOR Hospice will provide a written report within the annual report to AHCA that documents the progress of AMOR Hospice is seeking and obtaining the SageCare for LGBTQ+ Aging Cultural Competency certification.

Commitment to Bi-Lingual Staff

- **NEED:** Research confirms language is a key barrier to satisfactory and high-quality hospice care where provider to patient communication is

CON Action Numbers: 10786 through 10792

- ineffective due to limited English proficiency. As a county with significant non-English speaking, limited English proficiency, and bi-lingual populations, Broward County hospice patients will benefit from a provider that can consistently offer bi-lingual resources for their care.
- **COMMITMENT:** AMOR Hospice commits to developing a strong bi-lingual staff to assist in clear and culturally competent care for the diverse patient population in Broward County. AMOR Hospice is committing \$20,000 in signing bonuses over the first two years of operations to attract employees with bilingual skills, with a focus on Spanish dialects and Haitian-Creole to reflect the predominant and growing non-English languages and limited English proficiency populations in Broward County.
 - **COMMITMENT:** AMOR Hospice commits to minimum of 75% of its employees being bi-lingual by the end of its first year of operation.
 - **MEASURE:** AMOR Hospice will provide a report of the signing bonuses and its employee profile on bilingual capabilities as part of its annual report to AHCA over the first two years of operations.

Community Hospice Education

- **NEED:** Broward County is one of the most ethnically and racially diverse regions in the State of Florida. Broward County's significant Hispanic and Black demographics are themselves composed of myriad of ethnicities, nationalities, and cultures representing a collage of perspectives on death, dying, and perception on hospice care. In addition to having a strong foundation of culturally competent care skills, the community must be educated about the hospice benefit and services to drive utilization and overcome misconceptions/lack of knowledge within the communities that are underutilizing hospice
- **COMMITMENT:** AMOR Hospice commits to funding and providing specific community education and outreach regarding hospice services within the service area over the first two years of service implementation. AMOR Hospice commits to:
 - a. Forming a Hispanic Advisory Committee composed of at least five (5) members from the Broward County community within the first 3 months of operations. Intent is to identify members from various cultural backgrounds within the wider Hispanic demographic (e.g. Cuban, Venezuelan, etc.)
 - b. Forming a Black Advisory Committee composed of at least five (5) members from the Broward County community within the first 3 months of operations. Intent is to identify members from various cultural backgrounds within the wider Black demographic (e.g. African-American, Haitian, Jamaican, etc.)

CON Action Numbers: 10786 through 10792

- c. Hiring a bi-lingual (English/Spanish) Hospice Outreach Program Coordinator within the first 3 months of operations.
 - d. Implementing a culturally diverse & competent educational outreach program to better serve the Hispanic, Haitian, and other underserved population groups identified by the program personnel in conjunction with community leaders.
 - e. Operate a dedicated van at the inception of the program which will travel as appropriate to many of the following: community centers, health facilities, churches, temples, assisted living facility meetings, and nursing home meetings to provide hospice outreach and education. Another dedicated van will be added once the program reaches an average daily census of 120. The outreach program will provide pamphlets, brochures and firsthand information about hospice services. AMOR Hospice is allocating \$50,000 in funds to operate the initial van.
 - f. Conducting at least forty-eight (48) education events at local providers, community groups, churches, schools, etc. within the first two years of operations.
 - g. Allocate \$20,000 in additional funds for media, development of bi-lingual & transcreated [sic] materials for the diverse demographics in Broward County, and other general program expenses to support the community outreach program within the first two years of operation.
- **MEASURE:** AMOR Hospice will report progress on each program development milestones to AHCA within the annual report.

Hospice Office Development

- **COMMITMENT:** AMOR Hospice commits to a principal care delivery site at 1625 N Commerce Pkwy #200, Weston, FL 33326-3216 (or like site within same region pending finalization of lease terms), upon program inception and tracking completion of the proposed arrangements with AHCA.
- **MEASURE:** AMOR Hospice will provide annual reports to AHCA detailing the progress and completion of the above commitment for office development.

Accreditation Through Community Health Accreditation Partner (CHAP)

- **COMMITMENT:** AMOR Hospice commits to pursuing and obtaining accreditation by the Community Health Accreditation Partner (CHAP), or another CMS approved accreditation agency. AMOR Hospice is committing \$10,000 for the three-year accreditation cost.
- **MEASURE:** AMOR Hospice will provide evidence of its accreditation.

Palliative Care Program

- **COMMITMENT:** AMOR Hospice commits to establishing a palliative care program by the end of its first year of operations. This will ensure the continuum of care is secured for patients that are often approaching a need for hospice, but have not yet qualified, are [sic] able to receive treatments they require under palliative care.
- **MEASURE:** AMOR Hospice will provide annual reports to AHCA detailing the progress and completion of the above commitment.

Program Service Commitments

- **COMMITMENT:** Over its initial two years of operations, AMOR Hospice will assure [sic] each patient has five to seven Home Health Aide visits per week, provided this is acceptable to the IDT, patient and family.
- **MEASURE:** AMOR Hospice will provide annual reports to AHCA detailing the progress and completion of the above commitment.

- **COMMITMENT:** Over its initial two years of operations, AMOR Hospice will assure each patient has a minimum of two RN visits per week, provided this is acceptable to the IDT, patient and family.
- **MEASURE:** AMOR Hospice will provide annual reports to AHCA detailing the progress and completion of the above commitment.

- **COMMITMENT:** Over its initial two years of operations, AMOR Hospice will seek to respond to all its referrals within one hour, initiate the assessment process within four hours, and expedite admission to the hospice subject to having a physician order in hand and the patient/family selecting the hospice option.
- **MEASURE:** AMOR Hospice will provide annual reports to AHCA detailing the progress and completion of the above commitment.

- **COMMITMENT:** Over its initial two years of operations, AMOR Hospice will commit that at least 75% of their patients will receive visits from a Registered Nurse or Medical Social Worker on at least 2 days of the 3 final days of their life.
- **MEASURE:** AMOR Hospice will provide annual reports to AHCA detailing the progress and completion of the above commitment.

- **COMMITMENT:** Within its first year of operation, AMOR Hospice will develop a Volunteer Program reflecting "Guardian Angel 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

CON Action Numbers: 10786 through 10792

hours of life to patients without family support or patients and families who need additional support. Guardian Angel volunteers also provide support to family members who need a break from the bedside of their loved one during the dying process. AMOR Hospice commits to having a minimum of 10 volunteers after one (1) year of licensure.

- **MEASURE:** AMOR Hospice will provide annual reports to AHCA detailing the progress and completion of the above commitment.
- **COMMITMENT:** Within its first year of operation, AMOR Hospice commits to developing a pet therapy program, offering massage & reiki therapy, and implementing a music therapy program with a Legacy Program component where a stethoscope will be provided to family of their loved ones recorded heartbeat turned to music.
- **MEASURE:** AMOR Hospice will provide annual reports to AHCA detailing the progress and completion of the above commitment.

Medicaid Enrollment & Population

- **COMMITMENT:** AMOR Hospice intends to serve the Medicaid Community and shall seek Medicaid enrollment immediately upon receiving Medicare approval. Further, AMOR Hospice commits to seeking a Medicaid population service level that represent at least 4.5% of its annual admissions volume over its first two years of operations. AMOR Hospice commits to developing targeted outreach and education to high-volume Medicaid providers (in addition to its wider community education) to increase hospice utilization and referrals amongst this demographic and in support of this commitment.
- **MEASURE:** AMOR Hospice shall report on its outreach efforts and verify its Medicaid enrollment status as part of its of its annual report to AHCA for the first two years of operations.

Indigent Care

- **COMMITMENT:** AMOR Hospice intends to serve the indigent community and commits to seeking an indigent population service level that represent at least 2% of its annual admissions volume over its first two years of operations. AMOR Hospice commits to developing targeted outreach and education to local shelters, FQHCs, and other community partners that may identify patients without insurance coverage that are in need of hospice services.
- **MEASURE:** AMOR Hospice shall report on its total indigent admissions as part of its annual report to AHCA for the first two years of operations.

No Fundraising Commitment

- **COMMITMENT:** AMOR Hospice commits to not solicit donations or conduct charitable fundraising within the market, ensuring the new program does not compete with existing providers for community charitable resources.
- **MEASURE:** AMOR Hospice shall confirm it has not sought charitable donations and funds as part of its annual reports over the first three years of operations

Arc Hospice of Florida, LLC (CON application #10787), also referenced as Arc or the applicant states it is a for-profit, Florida Limited Liability Company established on February 21, 2023. Arc states that its parent company, American Hospice Systems (AHS) owns and operates Arcturus Hospice and Palliative Care in Norcross, Georgia. Arc Hospice of Florida, LLC has an approved CON (#10740) to establish a new hospice program in SA 3A.

The applicant expects issuance of license in January 2025, and initiation of service January 2025.

The applicant proposes \$373,370 in total project costs, including equipment, project development, and start-up costs.

Pursuant to project approval, Arc Hospice offers the following twelve Schedule C conditions predicated upon award:

General

- Arc Hospice will commit to conduct an annual Bereavement Symposium to provide local clergy and other professionals with resources to support those in grief.

Proposed Measure: This will be measured by annual reporting of the Symposium date and attendance to AHCA.

- Arc Hospice also proposes to provide annual funding of \$20,000 for at least the first five years, towards the Arc of Life program designated for the end-of-life wishes for Arc Hospice patients and their families beginning in the first year of operation.

Proposed Measure: This will be measured by reporting the expenditures of the funds to AHCA.

- Arc Hospice will develop and implement a pre-hospice palliative care program.

CON Action Numbers: 10786 through 10792

Proposed Measure: This will be measured by reports presented to AHCA detailing the program and initiatives within the program.

- Arc Hospice will allocate \$10,000 annually for five years to organizations in Broward County which support unfunded and undocumented community members by providing an array of medical services.

Proposed Measure: This will be measured by reporting the expenditures of the funds to AHCA.

Cultural, Ethnic, and Racial

- For the cultural connections outreach and education program, Arc Hospice commits \$15,000 annually for a period of five years for hosting quarterly community educational programs specifically for the Caribbean, Hispanic, and African American communities.

Proposed Measure: This will be measured by reporting the expenditures of the funds to AHCA.

- Arc Hospice will have in place a Cultural Liaison position, a key team member who is appointed to take the lead on minority outreach initiatives. This individual will be responsible for helping to identify, develop and implement strategies and plans to bridge cultural differences.

Proposed Measure: This will be measured by reports presented to AHCA detailing the position is filled and the progress of the development of annual initiatives.

- Arc Hospice commits \$20,000 annually for a period of five years for programming specifically for the Jewish community. Additionally, Arc Hospice will seek accreditation with the National Institute for Jewish Hospice within 18 months of initial licensure.

Proposed Measure: This will be measured by reporting the expenditures of the funds to AHCA and submitting certification for accreditation documentation upon receipt.

Education

- Arc Hospice commits to collaborating with Nova Southeastern University to develop a coordinated education curriculum related to hospice and provide high-quality field placement opportunities for the numerous health care professions degree programs offered at the university. This program will be supplemented with a \$20,000 annual funding commitment for, at a minimum, the first five years of operation.

Proposed Measure: This will be measured by reporting the expenditures of the funds to AHCA.

- Arc Hospice also commits to developing a formalized internship program with a local educational institution specifically to provide internship opportunities within Arc Hospice for the Caribbean, Hispanic, and African American communities. This program will be supplemented with a \$15,000 annual funding commitment for, at a minimum, the first five years of operation.

Proposed Measure: This will be measured by reporting the expenditures of the funds to AHCA.

- Arc Hospice is committed to providing internship opportunities to qualified students in nursing, gerontology, social work, music therapy, and pastoral counseling training programs within the hospice service area. This program will be supplemented with a \$15,000 annual funding commitment for, at a minimum, the first five years of operation.

Proposed Measure: This will be measured by reporting the expenditures of the funds to AHCA.

- Arc Hospice is committed to supporting and sponsoring hospice and palliative care certifications for its skilled nursing staff (CNA, LPN, RN, and APN). This program will be supplemented with a \$15,000 annual funding commitment for, at a minimum, the first five years of operation.

Proposed Measure: This will be measured by reporting the expenditures of the funds to AHCA.

Transportation

- Arc Hospice will allocate \$15,000 per year for three years to fund patient and family transportation needs where transportation is a barrier in the Service Area.

Proposed Measure: This will be measured by reports presented to AHCA detailing the progress of the development of the program. The reports will be annual until the program development is completed.

Bonita Springs Healthcare Services, LLC (CON application #10788), also referenced to as BSHS or the applicant is a newly formed for profit entity established in Florida on February 21, 2024.

The applicant expects issuance of license on October 15, 2024, and initiation of service January 1, 2025.

The applicant proposes \$436,449 in total project costs, including building, equipment, project development, and start-up costs.

Pursuant to project approval, BSHS offers the following thirty-five Schedule C conditions predicated upon award:

1. Development of health care continuum of care within two years of the hospice's licensure including:
 - Home Care services
 - Home Health
 - Palliative Care
 - DME service
 - Transit Services
 - Hospice Residential Facility (within 3 years)

In addition to the provision of a Hospice Service. Bonita Springs Healthcare Services LLCs parent company located in California currently provides all of these services and believes that this continuum of care enhances the patients it serves.

Compliance with this condition will be measured by a report to AHCA documenting the implementation of each of the services listed above. Currently there are no barriers to the implementation of these services. These services will be developed with the assistance of the parent corporation and the owner(s) and will not be shown as expenses on the hospice proforma and/or on its audited statements.

CON Action Numbers: 10786 through 10792

Should there be changes in licensure which could make the implementation of one or more of the above not feasible Bonita Springs Healthcare Services LLC will notify ACHA in writing.

2. Bonita Springs Healthcare Services LLC will establish a committee to determine the specific cultural needs of each of the Service Area's religions and will invite leaders of each of these religions to attend bi-monthly meetings to discuss and improve the quality of the service being rendered.

Compliance with this condition will be documented by maintaining attendance records which include at a minimum the names of the individuals invited, the names of the individuals who attend, the time/date/location of the meeting. These records will be submitted to the Agency upon request.

3. Bonita Springs Healthcare Services LLC commits to minimum of 25% of its employees being bilingual and to provide translated forms and literature as needed.

Compliance with this condition will be documented by annual submission of a statement to AHCA that the condition has been met. Bonita Springs Healthcare Services LLC will maintain statistics which demonstrates the total number of employees and the number of individuals who speak languages other than English. This will be made available to the Agency upon request with names redacted to protect the privacy of the employee. This condition will also be measured by an annual report to AHCA providing a summary of the translated documents.

4. Bonita Springs Healthcare Services LLC will commit to at least 25% being a minority workforce to meet the cultural needs of the underserved African American & Hispanic communities

Compliance with this condition will be documented by annual submission of a certification to Al-ICA that the condition has been met. Bonita Springs Healthcare Services LLC will maintain statistics which demonstrates the total number of employees and the number of minority individuals. This will be made available to the Agency upon request with names redacted to protect the privacy of the employee.

CON Action Numbers: 10786 through 10792

5. Bonita Springs Healthcare Services LLC will complete a Nursing visit within 24 hours after the admission.

Compliance with this condition will be documented by annual submission of a certification to AIICA that the condition has been met. Bonita Springs Healthcare Services LLC will maintain statistics which demonstrates the total number of patients admitted and the total number of patients seen within 24 hours of the admission by a nurse.

6. All new admissions will receive a personal call from a member of Bonita Springs Healthcare Services LLC executive team within 3 days of admission to determine if the patient and/or the patients family/advocate were satisfied with the services. Any complaints will be appropriately addressed.

Compliance with this condition will be documented by annual submission of a certification to AHCA that the condition has been met. Bonita Springs Healthcare Services LLC will maintain statistics which demonstrates the total number of patients called within 3 days of their admission and the total number who expressed any complaint.

7. Bonita Springs Healthcare Services LLC recognizes that patients in their final days still wish to be comfortable and as presentable as possible to their family and friends. Bonita Springs Healthcare Services LLC have people to provide manicures, pedicures and beauticians to address this need. These services will be available to all patients when appropriate.

Compliance with this condition will be documented by annual submission of a certification to AHCA that the condition has been met. Bonita Springs Healthcare Services LLC will maintain statistics related to personal care.

8. Bonita Springs Healthcare Services LLC will provide podiatrists to provide comfort to diabetic foot patients.

Compliance with this condition will be documented by annual submission of a certification to AHCA that the condition has been met. Bonita Springs Healthcare Services LLC will maintain statistics related to care rendered by podiatrists.

CON Action Numbers: 10786 through 10792

9. Bonita Springs Healthcare Services LLC will implement an outreach program to meet the Muslim population living within the service area by meeting with the Muslim Community' s leaders and assembling an appropriate care team for the assessment and treatment of this population.

This will be measured through the establishment of goals and objectives and providing AHCA with a copy of these goals and showing how these goals were met

10. Bonita Springs Healthcare Services LLC commits to seek accreditation by the Community Health Accreditation Program (CHAP) or the Accreditation Commission for Health Care (ACHC) at the earliest date possible but no later than within the 2nd year following the commencement of operations.

Compliance with this condition will be documented by annual submission of a certification to AHCA that the condition has been met. This will include copies of accreditation application and letter of accreditation.

11. Implementation of an educational outreach program to better serve the Muslim, 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 care facilities, churches, ALF meetings to provide hospice outreach and education. The outreach program will provide pamphlets, brochures and firsthand information about hospice services. The program will also include the assembling of an appropriate care team for the assessment and treatment of this population.

Bonita Springs Healthcare Services LLC is committing \$100,000 to this program.

Compliance with this condition will be measured by an annual report to AHCA providing a summary of the education and outreach programs.

12. Bonita Springs Healthcare Services LLC conditions this application to develop a program for "End-Stage Cardiac" patients which includes telehealth.

CON Action Numbers: 10786 through 10792

Compliance with this condition will be documented by Bonita Springs Healthcare Services LLC providing the Agency supporting documentation that a program has been developed. Additional information will include financial records and any written agreements in relation to the telehealth equipment such as leases.

13. Implementation of DeVero electronic medical records (or equivalent) system at startup, including the use of mobile point-of-care devices.

Compliance with this condition will be measured by a report to AHCA documenting the implementation at start-up.

14. Bonita Springs Healthcare Services LLC's Veteran's Program will honor Veterans by providing a hospice care program that recognizes and responds to the unique needs of the Veteran and his/her family. Hospice for veterans integrates all of the holistic and specialized pieces of hospice care, like pain and symptom management, with special services designed just for veterans. All Veterans in the Hospice for Veteran's Program will get pinned by a ranking member of the military force in which he or she served; visits from volunteers who are also Veterans; and guidance with military benefits, records recovery and burial arrangements.

Compliance with this condition will be measured by a report to AHCA documenting the Veteran 's Program has been implemented in District 10.

15. Bonita Springs Healthcare Services LLCs Volunteer Program in Broward County will include a team of specifically trained volunteers available to respond on short notice to provide presence during the last few hours of life to patients without family support or patients and families who need additional support. Vigil volunteers also provide support to family members who need a break from the bedside of their loved ones during the dying process.

Compliance with this condition will be documented by an annual report to AHCA summarizing the accomplishments of the Volunteer Program.

16. Offering of internship experiences for positions such as social workers, bereavement counselors, chaplains, nursing students and medical students. We will seek contracts with local universities, colleges and technical schools as Bonita Springs Healthcare Services LLC has done in other markets.

CON Action Numbers: 10786 through 10792

Compliance with this condition will be measured by an annual report to AHCA summarizing the number of interns taking advantage of the program in D-10.

17. Provision of alternative therapies beyond the core hospice benefit, such as massage therapy, pet therapy, music therapy, art, or other such alternative therapies when eligible and needed. It will contract a per diem Board Certified Music Therapist to be available as necessary to meet the patient's needs.

Compliance with this condition will be measured by an annual report to AHCA summarizing the alternative therapies provided.

18. Bonita Springs Healthcare Services LLC commits to provide up to \$2,500 per employee and up to \$20,000 annually for tuition reimbursement for employees to continue education in hospice or end-of-life care. This includes tuition reimbursement for Bonita Springs Healthcare Services LLC staff to obtain further hospice training enhancing the quality of care for hospice patients/residents, as well as supporting staff ability to advance professionally.

Compliance with this condition will be documented by an annual affirmative statement to AHCA that a tuition reimbursement process is in place. In addition, Bonita Springs Healthcare Services LLC will provide a listing of hospice certified staff

19. Offering of specific programs and targeted outreach efforts to serve patients with non-cancer diagnoses.

Compliance with this condition will be measured by a signed certification by Bonita Springs Healthcare Services LLC which may be supported by review of admission reports by patient diagnosis produced by Bonita Springs Healthcare Services LLC.

20. Bonita Springs Healthcare Services LLC will provide at a minimum one meeting per quarter for the public on the differences of how different religions handle death and dying.

This will be measured by a signed certification by Bonita Springs Healthcare Services LLC to AHCA.

CON Action Numbers: 10786 through 10792

21. Bonita Springs Healthcare Services LLC will assure each patient has 5 to 7 Home Health Aide visits per week, provided this is acceptable to the patient and family.

This will be measured by a signed certification submitted by Bonita Springs Healthcare Services LLC to AHCA.

22. Bonita Springs Healthcare Services LLC will assure each patient has a minimum of 2 RN visits per week, provided this is acceptable to the patient and family.

This will be measured by a signed certification submitted by Bonita Springs Healthcare Services LLC to AHCA.

23. Bonita Springs Healthcare Services LLC will make a best effort to respond to all referrals within one hour, initiate the assessment process within two hours, and expedite admission to the hospice subject to having a physician order in hand and the patient/family selecting the hospice option.

This will be measured by a signed certification submitted by Bonita Springs Healthcare Services LLC to AHCA.

24. Bonita Springs Healthcare Services LLC will implement its Continuum Palliative Resources program within twelve months of receiving its Medicare.

This will be measured by a signed certification submitted by Bonita Springs Healthcare Services LLC to AHCA.

25. Bonita Springs Healthcare Services LLC will provide all of the required core components of hospice care set forth by Medicare Conditions of Participation as well as Florida hospice licensure requirements including the provision of all four levels of service (routine, continuous care, general inpatient and respite) to all types of patients without regard to race, ethnicity, gender, age, religious affiliation, diagnosis, financial status, insurance status or any other discriminating factor.

This will be measured by continuous licensure.

26. Bonita Springs Healthcare Services LLC will maintain statistics which demonstrates the total number of employees and the number of individuals who speak languages other than English. This will be made available to the Agency upon request with names redacted to protect the privacy of the employee.

CON Action Numbers: 10786 through 10792

This condition will also be measured by an annual report to the Agency providing a summary of the employees who speak languages other than

English. Additionally, the Agency may review documents which have been translated to other languages.

27. Bonita Springs Healthcare Services LLC will offer internship experiences for positions such as social workers, bereavement counselors, chaplains, nursing students and medical students. We will seek contracts with local universities, colleges and technical schools just as Bonita Springs Healthcare Services LLC has done in other markets.

Compliance with this condition will be measured by an annual report to AHCA summarizing the number of interns taking advantage of the program in D-10.

28. Bonita Springs Healthcare Services LLC will recruit a minimum of 25% 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.

Compliance with [his condition will be measured by an annual report to AHCA summarizing the number of bilingual volunteers who have been recruited and retained.

29. Bonita Springs Healthcare Services LLC will commit to the development and implementation of programs focused on improving access to hospice services persons of Jewish heritage. The program will include training on cultural differences and competencies and flexible programming to meet their unique needs. Special community education efforts, clinical care protocols, and bereavement services for families will be implemented. Bonita Springs Healthcare Services LLC will provide periodic in-service training for staff, which includes a session on intercultural competencies in relation to Jewish clients. The Jewish Chaplaincy within the community will provide Bonita Springs Healthcare Services LLC with prayer materials and offer consultations to management on specific issues which require rabbinic/Jewish counsel.

Bonita Springs Healthcare Services LLC will maintain records related to these services and Compliance with this condition will be

CON Action Numbers: 10786 through 10792

documented by annual submission of a certification to AHCA that the condition has been met. Bonita Springs Healthcare Services LLC will maintain data reflecting the number of patients by religion and will make this available to AHCA.

30. Bonita Springs Healthcare Services LLC commits to providing a minimum of one educational seminar per quarter focusing on end-of-life issues for professionals who work with end-of-life patients (such as physicians, nurses, religious leaders, etc.). Bonita Springs Healthcare Services LLC will commit a minimum of \$50,000 over the first three years of operation for this effort. In addition, Bonita Springs Healthcare Services LLC will provide a listing of educational materials regarding end-of-life issues at these seminars. Topics would be expected to include end-of-life care and taking care of hospice patients with Alzheimer's disease and with blood borne pathogens and taking care of the hospice patient with HIV. Other topics may include: Domestic violence, elder abuse, patient rights, communication of end-of-life issues.

Bonita Springs Healthcare Services LLC will maintain data reflecting the date/time/location of these seminars and will make these reports available upon request by AHCA to demonstrate compliance with this condition.

31. Bonita Springs Healthcare Services LLC commits to establish a patient/family "Special Need's fund of \$10,000 for each of the first five years of operation to be used by the clinical team members to meet unusual and uncovered patient and family needs.

Compliance with this condition will be shown on the annual revenue and expense report.

32. Bonita Springs Healthcare Services LLC commits to provide 24-hour, seven days a week telephone response provided directly by Bonita Springs Healthcare Services LLC staff and also commits to provide 24 hour, seven days a week interpretive services, either by Bonita Springs Healthcare Services LLC staff or through a contracted interpretive.

This will be measured by a signed certification submitted by Bonita Springs Healthcare Services LLC to AHCA.

33. Bonita Springs Healthcare Services LLC commits to having an RN available to respond to each phone call within 10 minutes at all times.

CON Action Numbers: 10786 through 10792

This will be measured by a signed certification submitted by Bonita Springs Healthcare Services LLC to AHCA.

34. Bonita Springs Healthcare Services LLC commits to implement a volunteer program that focuses on groups who traditionally have not been significantly involved in hospice programs such as teens and ethnic and racial minorities. Partnership programs with local high schools (students must be at least 16 years old), veterans associations and churches, Temples and Mosques will be developed. Volunteer opportunities are listed as Vigil Volunteers, Friendly Visitor, and administrative volunteers.

The volunteer coordinator will maintain records and these could be provided to the Agency upon request with names dictated out to protect the privacy of the volunteer(s) and the patient(s).

35. Bonita Springs Healthcare Services LLC will develop a "Telephone Bank" volunteer group specifically intended to provide compassionate conversations with patients not wishing to burden their families with their needs to speak or to call in the middle of the night just because they couldn't sleep. These volunteers may also be asked to assist the patients with letter writing or text messaging.

The volunteer coordinator will maintain records and these could be provided to the Agency upon request with names dictated out to protect the privacy of the volunteer(s) and the patient(s).

Bristol Hospice – South Florida, LLC (CON application #10789), also referenced as Bristol Hospice or the applicant, is a newly formed for profit entity established in Florida on February 12, 2024 whose ultimate parent is Bristol Ultimate Holdco, L.P., a national hospice provider in 17 states, including Arizona, California, Colorado, Florida, Georgia, Hawaii, Illinois, Louisiana, Massachusetts, Missouri, Oklahoma, Oregon, Texas, Utah, Virginia, Washington and Wisconsin. Bristol Hospice – South Florida, LLC (Miami-Dade County) in SA 11 is applicant's Florida affiliate.

The applicant expects issuance of license on December 31, 2024, and initiation of service January 1, 2025.

The applicant proposes \$315,163 in total project costs, including equipment, project development, and start-up costs.

CON Action Numbers: 10786 through 10792

Pursuant to project approval, Bristol Hospice offers the following 17 Schedule C conditions predicated upon award:

Condition 1: High Intensity Nursing and Aide Care. Bristol commits to high intensities of care provided through nurses and hospice aides. Each patient will have an individual plan of care which allows for 5 to 7 Home Health Aide visits per week and a minimum of 2 RN visits per week as determined by patient need.

Proposed measure: This will be measured by annual reporting to AHCA of visit-to-patient ratios for nursing and aide services.

Condition 2: Community Support from the Bristol Foundation. Bristol Hospice will provide support to the community through its national Foundation upon licensure of the program. This includes education, community outreach, and financial assistance for Broward families, as well as aid and support for events and community organizations in Broward County to promote hospice access.

Proposed measure: This will be measured by annual reports presented to AHCA outlining the community members and community organizations supported by the Bristol Foundation.

Condition 3: Dedicated Community Liaison. Bristol will staff a dedicated Community Liaison position which will provide outreach to underserved communities in Broward County.

Proposed measure: This will be measured by annual reports presented to AHCA outlining the outreach activities and communities engaged by the Hospice Community Liaison.

Condition 4: Dedicated Mobile Outreach Unit. Bristol commits to developing and deploying a dedicated mobile outreach unit to engage with low-income and ethnically diverse populations within the service area. This will be operated through Bristol's palliative care program, Advanced Illness Management ("AIM"), and the commitment includes:

- Funding: Bristol AIM will allocate \$400,000 starting in the second year of operation to purchase, equip, and operate the mobile outreach unit. This investment will cover the costs of the vehicle, outreach and educational equipment, and initial operational expenses.
- Staffing: the mobile unit will be staffed by a team of professionals, including at least one bilingual nurse and one bilingual social worker, to ensure effective communication with diverse

CON Action Numbers: 10786 through 10792

populations. The staff will be trained in cultural competency, hospice and palliative care awareness, and community education.

- **Services Offered:** the unit will focus on education about hospice and palliative care options and advance care planning. It aims to increase awareness and understanding of hospice and palliative care, facilitate early identification of hospice-eligible patients, and support for caregivers.
- **Partnerships:** Bristol will establish relationships with local health centers, community organizations, and social services to integrate the mobile unit's outreach efforts with existing health care infrastructure.
- **Outreach and Education:** through regular visits to underserved areas, the mobile unit will provide education on the benefits and availability of hospice and palliative care and engage with the community to address cultural barriers.

Proposed measure: This will be measured by semiannual reports presented to AHCA detailing the progress of the program development through its completion.

Condition 5: Transportation Support. Bristol commits to funding patient and family transportation needs for its hospice patients, especially for those in rural areas with limited public transportation. Bristol will provide up to \$25,000 annually for bus vouchers and other transportation assistance for patient and family transportation to and from medical appointments, support groups, and other hospice related activities.

Proposed measure: This will be measured by annual reports presented to AHCA outlining the bus vouchers provided and transportation activities.

Condition 6: Financial Assistance for Indigent Patients. Bristol will provide free or discounted care to patients in need of hospice care and without financial resources. Patients with an income level of 100% of the Federal Poverty Level will be eligible for full financial assistance. Patients with an income level between 100% and 200% of the Federal Poverty Level will be eligible for 50% financial assistance.

Proposed measure: This will be measured by annual reports presented to AHCA detailing the level of financial assistance provided to community members in need.

Condition 7: Veteran Specific Programming. Bristol will develop a specialized Veteran program, including honors ceremonies, life review projects, special events, and Veteran volunteers to visit Veteran patients to provide camaraderie and companionship. Patient military history and preferences will be integrated into the individualized care plans, and Bristol engages in ongoing education of staff and volunteers to provide veteran centric care. Bristol will pursue We Honor Veterans Level 4 Partnership Certification within the first years following licensure.

Proposed measure: This will be measured by semiannual reports presented to AHCA detailing the progress of the program development through its completion.

Condition 8: Specialized Cancer Care Program. Bristol will implement a cancer care program, including specialized yearly training for its nurses, social workers, chaplains and HHAs.

Proposed measure: This will be measured by semiannual reports presented to AHCA detailing the progress of the program development through its completion.

Condition 9: Cancer Patient Outreach. Bristol will retain the services of oncology specialized ARNPs or physicians to conduct education and outreach to oncology officers and physicians. Service area oncology offices will receive direct outreach and education.

Proposed measure: This will be measured by semiannual reports presented to AHCA detailing the progress of the program development through its completion.

Condition 10: Specialized Stroke/CVA Program with Patient Outreach. Bristol will implement a Stroke/Cerebrovascular Accident program, including specialized yearly training for its nurses, social workers, chaplains and HHAs. Bristol will retain the services of cardiovascular and neurological specialists to conduct education and outreach to health care professionals, stroke support groups, and senior care facilities about how hospice care can help stroke patients and their families cope with end-of-life.

Proposed measure: This will be measured by semiannual reports presented to AHCA detailing the progress of the program development through its completion.

Condition 11: Bright Moments for Patients with Alzheimer's, Dementia, and other Neurological Conditions. Bristol will implement its Bright Moments program, for specialized care related to Alzheimer's, Dementia, and other Neurological conditions. Bright Moments' 'Point of Light' kit includes:

- Music Device with Headphones
- Weighted Blanket
- Chart-A-Life for special moments and preservation of patient memories
- Hand-held Distraction Device
- Memory-Enhancing Aromatherapies
- Therapeutic Companion Bear
- Specialized Utensils
- Specialized Care Products

Proposed measure: This will be measured by annual reports presented to AHCA detailing the number of Broward patients served by Bright Moments.

Condition 12: Sweet Dreams Program for Better Hospice Patient Outcomes. Bristol's Sweet Dreams Service will be an included part of its hospice services. Sweet Dreams includes creation and delivery of a personalized care plan and services related to Aromatherapy, Sound and/or Music Therapy, PM Care (face wash, foot soak, nail care, mouth care, etc.), and a Gentle Spa Approach (Low lights, spa music, fountains, soft words, slow approach). The Sweet Dreams program is an innovative & non-pharmacological approach supported by research, which shows these types of therapy methods effective to promote better hospice patient outcomes.

Proposed measure: This will be measured by annual reports presented to AHCA detailing the number of Broward patients served by Sweet Dreams.

Condition 13: Palliative Care Provided through Bristol's Advanced Illness Management Program ("AIM"). Bristol's AIM provides palliative care services to patients with a serious illness. The Bristol team of physicians, nurse practitioners and social workers work with the patient's existing health care team to provide continuity and management of care wherever the patient lives. Palliative care services can be provided at any stage of advanced or serious illness and would be provided along with other medical services such as cardiac, cancer care, home health and therapies.

Proposed measure: This will be measured by annual reports presented to AHCA detailing the number of Broward patients served by AIM.

Condition 14: CHAP Accreditation. Bristol Hospice will become accredited by CHAP within six months of licensure of the program.

Proposed measure: This will be measured by semiannual reports presented to AHCA detailing the progress of the accreditation process through its completion.

Condition 15: Proximity of Broward County Office to Underserved Populations. Bristol will establish a physical presence in Ft. Lauderdale within Broward County to best serve county residents we have identified as underserved and improve the efficiency of its caregivers in serving these populations.

Proposed measure: This will be measured by a statement to AHCA confirming Bristol's office in Ft. Lauderdale following licensure.

Condition 16: Forgoing of Fundraising. Bristol commits to not doing any fundraising activities or events within Broward County for the first two years.

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

Condition 17: Virtual Reality Program. Bristol commits to purchasing Virtual Reality equipment and the development of patient-specific platforms which honor the patient's culture and provide cultural experiences not otherwise possible. For example, Veterans unable to participate in the Veteran Honor Flight will be offered a virtual experience, and patients will be offered virtual experiences which honor their cultural history and "travel" to significant sites and experiences throughout the world.

Proposed measure: This will be measured by semiannual reports presented to AHCA detailing the development of the program through its completion.

Charis Healthcare Holdings, LLC (CON application #10790), also referenced as Charis or the applicant, is a for-profit, Florida Limited Liability Company established on March 31, 2014. The applicant states it is a provider of Medicare-Certified Hospice and Home Health Care that provides a variety of clinical services and related products and supplies to patients in their place of residence throughout Florida, Illinois, Washington, New Mexico, Nevada, Colorado, Oregon, Utah, and Arizona. Charis states it has 32 locations with more than 700 employees and its headquarters is in Boca Raton, Florida. Charis indicates it has hospice programs in Arizona (4) and Indiana (2).

CON Action Numbers: 10786 through 10792

Charis assures that it understands that Florida has another hospice provider operating as “Haven Hospice” and that, upon award, Charis will ensure that there is clear distinction in its operating d/b/a from the existing operator.

The applicant expects issuance of license in October 2024, and initiation of service January 2025.

The applicant proposes \$236,541.28 in total project costs, including equipment, project development, and start-up costs.

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

CHARIS will comply with all relevant state and federal legal authority and reporting requirements. CHARIS additionally commits to providing the following additional services:

- Care for the Caregiver
- Transfer Safety
- Overcoming a Patient Saying "NO"
- Hospice 101
- Palliative Care vs. Hospice Care
- Pain Control — another medication?
- Infection Control
- Preventing Wounds
- HIPPA
- Distracting Techniques
- Effective Communication with Memory Care Patients
- Medication Use with Hospice Patient at End-of-life
- Comfort Care — What is it?
- When to Call Hospice
- Handwashing — 101
- Dealing With Death
- Grief — It doesn't have to be a lonely journey

Proposed Measure: This will be measured by reporting the availability of the services to AHCA.

CHARIS will commit to offering \$35,000 to a local nursing education program within the service area to support the development of a hospice and palliative [sic] care training course. CHARIS expects to be able to identify, select, and fund a partner within 2 years of the hospice programs opening but will attempt to conclude as soon as possible.

Proposed Measure: This will be measured by reporting the expenditure of funds to AHCA.

CON Action Numbers: 10786 through 10792

CHARIS will additionally offer rotational internship placement of local nursing students under its new hospice program for at least the first 5 years of operation.

Proposed Measure: This will be measured by reporting the information to AHCA.

CHARIS will commit to actively seek "We Honor Veterans" status upon its award. CHARIS will expedite this process as it coincides with our foundational beliefs and support for veterans.

Proposed Measure: This will be measured by submitting the status verification to AHCA.

CHARIS will commit to actively recruit veterans to work with our clients and will advocate our veteran patients to participate in Honor Flight for Veterans.

Proposed Measure: This will be measured by reporting annual reports on veteran recruitment to AHCA.

CHARIS will commit to operate an outreach and education program designed to actively engage and educate the minority and low-income communities in the service area.

Proposed Measure: This will be measured by initial and annual reports to AHCA reflecting on the efforts of the program.

Office Location: CHARIS intends to have a hospice office space within the region within the first year of operation.

Proposed Measure: Compliance will be demonstrated by submission of the CHARIS hospice license with the office location.

CHARIS will commit to donate \$25,000 to the Hope Florida Fund for the service area and will contribute 75 hours per quarter in outreach events.

Proposed Measure: This will be measured by reporting annual reports on engagement to AHCA.

Moments Hospice of Broward, LLC (CON application #10791), also referenced as Moments, Moments Broward, or the applicant, is a newly formed development stage corporation established in Florida on February 20, 2024.

CON Action Numbers: 10786 through 10792

The applicant expects issuance of license in September 2024, and initiation of service in September 2024.

The applicant proposes \$436,549 in total project costs, which include equipment, project development, and start-up costs.

Pursuant to project approval, Moments Broward offers the following Schedule C conditions predicated upon award:

Initiation of Operation

Moments Hospice Conditions this application with submitting its licensure application for operations in Broward County within 30 days of being awarded the Certificate of Need.

- a. Moments conditions this application on notifying CHAP it is ready for its accreditation survey within 30 days of receiving state licensure. The Applicant will demonstrate compliance with this condition by submitting to AHCA a signed declaration in the annual conditions compliance report.

Patient Touches

Moments Hospice believes in giving generously of our services to improve the patient and family experience with hospice. Moments conditions this application with the following conditions:

- a. Responding to referrals within 1 hour of referral and starting the admission process within 2 hours of referral, subject to receiving the physician order and the patient and/or family being prepared to meet to initiate the hospice benefit,
- b. 24-hour Triage staffed by Moments Hospice direct employees with video capability. Additionally, Moments will have RNs available to do admissions 24/7/365, thus ensuring patients can receive the care they need to manage symptoms at all times, day and night.
- c. Hospice Aide Visits Providing at least five CNA visits per week on average, provided this is acceptable to the IDG, the patient, the patients family, and appropriate to the plan of care. When a need is present the patient will receive up to 7 CNA visits per week.
- d. Nursing Visits Providing at least two nursing visits per week on average, provided this is acceptable to the IDC, the patient, the patient's family and appropriate to the plan of care.
- e. Enterprise Car Lease Program 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

CON Action Numbers: 10786 through 10792

the Enterprise Car Lease Program upon commencement of operations.

- f. Team Member Recruitment Participation in at least 2 volunteer and/or job fairs a year for the first two years of operations.
- g. Communication & Coordination of Care - Communication tools and established expectations from patients and families at the time of admission are at the core of our Communication and Coordination of Care Program.
- h. Customization of care - An individualized hospice care plan is established by Moments Hospice interdisciplinary group in collaboration with the attending physician, the patient or representative, and the primary caregiver in accordance with the patient's needs. Customized care is at the core of the Moments Hospice Way.
- i. Initial Moments Program - All patients residing in nursing home or care facility setting would be included in this program as described in schedule B.

These conditions will be measured by a signed declaration submitted by the Applicant to AHCA in the conditions compliance report.

Team Member Training

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

- a. Hospice and Palliative Care Certification Moments will pay for hospice staff to obtain and maintain Hospice and Palliative Care certification.
- b. Death Doula training will be offered to volunteers and staff beginning the first year of operations.
- c. Reiki 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 submitting signed declaratory statement in the conditions compliance report.

Services Beyond Core

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 this application with the following services:

CON Action Numbers: 10786 through 10792

- a. Transportation Moments Hospice Foundation will assist with transportation costs for families and patients with limited resources to receive transportation to visit one another.
- b. Lasting Moments Legacy Projects. These will provide a comforting memory of their loved one after they have transitioned from their life.
- c. Final Wishes for hospice patients. Requests will be processed through the Moments Hospice Foundation.
- d. Pets are such an important part of people's lives. They are more than pets, they are family. Knowing the benefits of pets for the comfort and palliation of patients' symptoms at the end-of-life Moments has added the following conditions to honor the importance of pets in people's lives.
 - i. 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.
 - ii. Pet Peace of Mind Program will be initiated in Broward County within the second year of operations. Pet Peace of Mind uses hospice volunteers to attempt to keep pets with the patients until end-of-life and provide reassurance that a home for the pet has been found so the pet is ready to make a smooth transition to the new home at the end of the patients' life. Initiating this program will help patients with some of the psychological pain that comes from leaving their beloved pets behind.
 - iii. Reimbursement for volunteers for the certification and required vaccinations for their pets to become certified pet therapy animal to visit hospice patients.
- e. Virtual Reality: 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.

CON Action Numbers: 10786 through 10792

- f. Rabbi and access to other religions Moments will have a Rabbi and will have agreements and/or working relationships with various faith backgrounds such as Catholic, Muslim, and Buddhist.
- g. Music Therapy on staff. These services will be made available to all of Moments patients as appropriate to the plan of care and subject to the wishes of the patient and family.
- h. Massage Therapy on staff. These services will be made available to all of Moments patients as appropriate to the plan of care and subject to the wishes of the patient and family.

Compliance will be documented in the annual condition's compliance report by a signed declaratory statement.

Veteran Services

Broward County is home to many elderly veterans who would benefit from specialized hospice programming.

We Honor Veterans Program: Moments Hospice conditions this application on implementing the We Honor Veterans program upon commencement of operations. Moments will attain level 4 Star certification during the first two years of operations.

Other aspects of Moments Hospices commitment to veterans will be as described below.

- a. 4 Stars Moments will attain 4 stars in the We Honor Veterans Program within the 2nd year of operation.
- b. Veteran Volunteers Moments Hospice will recruit and retain veteran volunteers to provide veteran to veteran visits.
- c. Veteran Liaison A Veteran Liaison will be hired and provided special training to work with veteran organizations.
- b. Veteran Pinnings Moments Hospice will do 250 pinning's a year for 2 years.
- c. Veterans Honor Walls Creation of Veterans Honor Walls in at least 2 health care facilities in Broward County per year for two years. This will honor veterans living within these facilities and provide them with a sense of pride.
- e. Application Sponsorship for Veterans Moments Hospice will provide sponsorship to 2 veterans a year to complete application for additional homecare services through their VA benefit. This sponsorship will continue for at least 2 Years starting at least by the second year of operations for applications for VA benefit through VeteranCare or like organization. VeteranCare has noted to Moments Hospice that terminally ill veterans often do not receive this benefit related to the lengthy application process. Through a hardship letter from the physician and Moment's

CON Action Numbers: 10786 through 10792

sponsorship of the application completion, more veterans can receive this benefit.

- f. Honor Flight Sponsorship Honor Flight Network sponsorship for at least 2 veterans a year for 3 years starting no later than the second year of operations through the south Florida Honor Flight Hub or like organization. Compliance will be demonstrated by submitting proof of payment.
- g. Advance Care Planning Annually for 2 years Advance Care Planning sessions will be offered to veteran groups utilizing the five wishes or similar document.

The Applicant will demonstrate compliance with this condition by a signed declaratory statement in the annual conditions compliance report.

Open Access

Broward County 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, upon commencement of operations. Compliance will be demonstrated by a signed declaration in the annual conditions compliance report. The program will include these elements:

- a. Full Code patients Accepting eligible hospice patients, regardless of their code status.
- b. Medically Complexity Accepting eligible hospice patients receiving medically complex high acuity services 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.
- e. National Institute for Jewish Hospice 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.
- f. Bridge Program - This program serves as a bridge of transition from open access hospice to standard hospice. It allows patients to access their Hospice benefit while continuing certain treatments or medications that may otherwise be considered "life prolonging" for a defined period of time with the goal of ultimately discontinuing said treatment/medication once the patient/family has been emotionally, physically, or spiritually prepared.

Compliance with this condition will be demonstrated by a signed declaratory statement on the annual conditions compliance report.

Specialty Clinical Programs

Moments has developed programs that support our mission of Changing the Hospice Experience One Moment at a Time. Moments Hospice conditions this application with the initiation of the following programs within the first year of operation.

Cardiac and Pulmonary Program

- a. CHIRP Program- Cardiopulmonary Hospital Intervention & Readmission Program — As described in Schedule B.
- b. AHA (American Heart Failure) Certification The Palliative/Hospice Heart Failure certification will assist Moments in providing the optimal care to Broward County residents with life limited and severe heart disease. Moments conditions this application with receiving the AHA (American Heart Association) certification by the end of the 2nd year of operations.
- c. A Respiratory Therapist will be contracted and available upon commencement of hospice operations.
- d. Consultant Pharmacists Access to pharmacists for consultation and recommendations.

Dementia Program

- a. M.I.N.D. (Memories, Inclusion, Namaste, Dignity) Program - A program for those with Dementia as described in schedule B.
- b. Items will be provided to dementia patients to help their palliation symptoms. These items may include items such as fidget blankets, busy boxes, interactive robotic pets, lifelike dolls, and weighted blankets. Compliance with this condition will be demonstrated with a signed declaratory statement in the annual conditions compliance report.
- c. 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.

Cancer

Triad Program - an approach to managing complex pain among patients with Cancer as described in schedule B.

Falls

StepPrep Program is a Fall Prevention Program as described in schedule B.

ALS (Amyotrophic Lateral Sclerosis) and Neurological Program

Synapse Program which was developed due to the unique nature and progression of ALS and other neurological diseases, as described in schedule B.

Wound Program

Wound Program is for patients requiring wound management and is described in schedule B.

Sepsis Program

Sepsis Program will be used when patients with a primary diagnosis of Sepsis are admitted to hospice they will receive care as per this program as described in schedule B.

Renal Program

Renal Program is End Stage Renal Disease program and is described in schedule B.

Programs for Patients Approaching the Final Moments of Life

Final Moments —A program for all patients in their final moments of life as described in Schedule B. The program will include these elements:

- a. Muse Healthcare Analytics Moments will utilize Muse Healthcare Analytics or a similar program to identify patients entering their Final Moments.
- b. Death Doula Program Moments will implement the Death Doula program upon commencement of operations.
- c. Vigil Visits Moments Hospice trains staff, volunteers, and death doulas on providing care during the Final Moments also known as Active Phase of Dying. This Vigil Visit training equips team members, volunteers, and death doulas to provide comforting presence for patients and family members during the final days of life. Additionally, volunteers will be requested to make additional visits or sit with patients providing support to families and preventing patients from being alone. Moments will recruit volunteers specifically to support vigil visits with those nearing their last breath.
- d. Tender Moments Program -Companionship care program for all diagnoses as described in schedule B.

Moments conditions this application on providing all programs to hospice patients in Broward County, as appropriate to the patients Plan of Care. The programs will be implemented within the first year of operations.

Compliance with the implementation of the programs will be demonstrated by a signed declaratory statement in the conditions compliance report. The programs are described in schedule B and will include these elements:

- a. Moments Staff Education Moments will train all IDG staff on the Moments Programs upon implementation of the programs and on hire going forward. Compliance will be demonstrated by a signed declaratory statement in the annual conditions compliance report.
- b. Nurse Preceptor Moments Hospice's nurse preceptor will manage and train team members on programs.
- c. Community Education Moments will provide community education programs to inform the community on topics related to programs. Moments will provide educational events related to programs available four times a year, during the first two years of operations. Compliance will be demonstrated with attached sign in sheets for educational offerings in the annual conditions compliance report.
- d. Education Trailer Moments Hospice will extend use of the education trailer into Broward County to assist with education and outreach.

Supporting Minorities

Moments recognizes the diverse communities in Broward County who experience cultural barriers to care, including several Hispanic cultures, Black (Haitian, African American, etc.) residents, Jewish residents, and LGBTQIA+ residents. Moments Hospice conditions this application with providing the following elements.

- a. Bilingual Team Members To increase these residents' use of hospice services, Moments will hire bilingual staff.
- b. Bilingual Volunteers Moments will recruit and retain hospice volunteers that are bilingual.
- c. All Languages available
- d. SAGE Care 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.
- e. Food Drives Moments will conduct and/or partnering in at least 2 food drives or fund raising and awareness events for community members who are experiencing hardship during each of the first 2 years.
- f. Donations to provide aid for the homeless. Moments conditions this application on donating \$10,000 a year for 2 years to non-profit organizations who provide aid to the homeless or less fortunate.

The Applicant will demonstrate compliance with this condition by submitting a signed declaratory statement in the annual conditions compliance report.

Palliative Care

There is a need for palliative care for people not eligible or ready for hospice. Moments already has an established Palliative care program in Miami-Dade County and will extend its services seamlessly into Broward County. Moments Palliative Care program is CHAP Certified. The CHAP Palliative Care Standards were developed by providers of palliative care and the National Consensus Project for Quality Palliative Care. CHAP Certification 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 a signed declaratory statement as part of the conditions compliance report to AHCA.

Community Education

Providing education to the community helps everyone. As the saying goes "A rising tide lifts all boats". Moments conditions this application on the following community education initiatives:

- a. Five Wishes Moments conditions this application with the provision on Advance Care Planning education being provided to the community. This education will be provided with the 5 wishes or similar document. These documents will be available in English and Spanish. Upon request the document can be made available in other languages. These will be offered to the community at least 2 times a year.
- b. Education for Care Facilities Moments conditions this application with providing education in Skilled Nursing, Long Term Care, and Assisted Living Facilities. This education will be offered at least 4 times a year for 2 years.
- c. Internships Moments Conditions this application to provide internships to students in Broward County.
- d. Scholarships and Grants Moments Hospice conditions this application with providing scholarships or grants to schools for the education of minority or underserved persons in the community hoping to advance from CNA to LPN or RN and/or LPNs working to advance to RN. This will increase the number of nurses in Broward County to care for the residents. It will also help to provide opportunities to minorities and other residents experiencing hardship to improve their life circumstances. These grants/scholarships will be in the amount of \$5,000 per year for 2 years.

- e. Compliance will be demonstrated with a signed declaratory statement on the annual condition's compliance report.

Community Bereavement Support

- a. Grief and loss affect so many. Moments Hospice Bereavement program offers grief support to the loved ones of the patients we serve. Community members may be experiencing grief and not know where to turn or how to find the resources to help them through the emotions they are processing. Moments Hospice wants to support the community and help facilitate discussions about grief and provide ways for the community to access resources. Moments conditions this application with the following:
 - b. Bereavement Program - Our trained bereavement coordinators follow our bereaved families for 13 months after the death of their loved one. As grief is an individual journey Moments Hospice will extend bereavement support for up to 24 months (about 2 years) for those who need the additional support.
 - c. Children's Bereavement Center (CBC) Partnership Moments will donate \$5,000 per year during its first two years of operations to Children's Bereavement Center (CBC) to support its existing bereavement services and groups in south Florida. CBC provides bereavement services to Broward, Miami-Dade, and Palm Beach counties. The bereavement services are available for people from age 4 through the end-of-life. Their services are always offered free of charge to those in need. The Applicant will demonstrate compliance with this condition by providing AHCA proof of donations.
 - d. Local In-Person Support Group Moments Hospice conditions this application with provision of a local in-person support group. This group may be done in collaboration with Children's Bereavement Center or like organization. This will be offered to the bereaved family members of Moments Hospice but will also welcome in community members who are experiencing grief.
 - e. Greif Discovery Workshop We recognize that everyone grieves in their own way and time Moments Hospice will offer annually for at least 2 years a Greif [sic] Discovery Workshop starting by the second year of operations. It will be a day where bereaved family and friends can come and experience various options so they can utilize them in their healing journey going forward. Experiences could include activities such as: art, journaling, yoga, reiki, meditation, walking/hiking, tai chi, somatic work, sound healing/music/dance, EFT (Emotional Freedom Technique) or other therapeutic and complementary and alternative methods to aide people in processing grief. Attendees could sample different ways of processing grief to find those most helpful for them during their mourning time. Additionally, this would allow grieving people

CON Action Numbers: 10786 through 10792

to meet and connect with other people experiencing loss. This event would be open to members of the community providing free access to this information to any community member needing it, including minorities or socially disadvantaged people who may ordinarily not have access to this information.

- f. Butterfly Memorials Moments Conditions this application with the provision of a butterfly memorial or similar ceremony. This will occur at least 4 times per year for 2 years starting by the second year of operations or earlier. This will be provided for the bereaved Moments Hospice and partnering facilities who have had resident's pass.
- g. Children's Bereavement Support Moments Hospice conditions this application with providing support to children who experience grief. This support may include events in conjunction with Children's Bereavement Center (CBC) or like organizations for expressions through grief.
- h. Children's Grief Backpacks Support will also be provided through the provision of grief backpacks with supportive items inside to help children express and work through their grief. When the bereaved family members include children, age-appropriate backpacks will be sent out as requested by the bereavement team at Moments Hospice.
- i. Compliance with this condition will be demonstrated with a signed declaration in the annual condition compliance report.

Community Initiatives and support

Moments Hospice conditions this application on the following donations or involvement in community projects/initiatives to support the community.

- a. Toy Drives Moments Hospice conditions this application to participate or organize 2 toy drives during the holiday season during the first 2 years of operation. Moments wants to give back to the community in Broward County by helping families experiencing hardship will help ensure they have a fun and fulfilling holiday season. Moments will work with local partners or nonprofits in these toy drives.
- b. Donations to Cancer Organizations Moments conditions this application on donating \$5,000 to a non-profit organization to support patients going through cancer or other serious health issues in the region during each of Moments' first three years of operation.
- c. Donations to Non-Profits Moments Hospice wants to support the community, provide resources and solace to those who are disenfranchised, underserved in the current health care arena, experiencing hardship, or part of minority populations. Moments

CON Action Numbers: 10786 through 10792

Hospice Conditions this application with providing donations of \$15,000 per year for the first 3 years of operations to non-profit organizations.

- d. Donation to Establish Commercial Food Kitchen Moments Hospice conditions this application with providing financial support of \$10,000 a year for three years of operations to a nonprofit organization who will establish a commercial food kitchen to support the needs of underserved families and patients hospitalized in Broward County.

Compliance will be demonstrated with a signed declaratory statement and proof of donations in the conditions compliance report.

Moments Hospice Foundation

Moments conditions this application donating \$10,000 per year to the Moments Hospice Foundation for the first 3 years of operation to fund wish fulfillment and veterans' programs. The Applicant will demonstrate compliance with this condition by providing AHCA with a copy of the checks or funds transfer.

Moments is committed to not soliciting any donations for the Moments Hospice Foundation.

Other

Compliance Hotline Health Care workers want to work for ethical compliant companies. Moments Hospice contracts with Ethical Advocate to provide 24-hour, everyday access for ethical and compliance concerns to be anonymously reported. Having access to this resource will ensure Moments can attract ethical heart centered employees to provide care to our hospice patients. Moments will provide a compliance hotline to all Moments Hospice staff at commencement of operations. Compliance will be demonstrated with signed declaratory statement in the annual conditions compliance report.

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 believes they will improve hospice utilization and quality. Therefore, Moments has conditioned this application on employee who will be responsible 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 in its annual conditions compliance report.

Parkside Hospice and Palliative Care, LLC (CON application #10792), also referenced as Parkside Hospice, Parkside, or the applicant, is a newly formed for profit entity established in Florida on March 21, 2024 whose parent company is Parkside Health Group.

The applicant expects issuance of license in January 2025, and initiation of service in June 2025.

The applicant proposes \$305,365 in total project costs and includes project development cost and start-up costs.

Pursuant to project approval, Parkside Hospice offers the following 10 Schedule C conditions predicated upon award:

1. Parkside Hospice offers the SAGE Program: This is a unique Dementia/Alzheimer's program partners with Memory Care facilities in Broward County. This program will provide hospice care to deliver skilled Dementia/ Alzheimer's Care for such a delicate level of care.

Measure: The annual monitoring report will include the number of cases that participated in this program.

2. Palliative Care: Parkside Hospice will provide non-billable LPN visits to our patients, offering vital checks to alert us of a patient who needs additional visits. Parkside Hospice will include Non-Hospice Palliative Care services lead by a nurse practitioner for those with a twelve-month or less prognosis.

Measure: The hospice provides a quarterly report of numbers of cases and the devices/supports that were provided.

3. Veterans Program: Parkside Hospice will provide Tele-Monitoring and case management of community resources to Veterans with life limiting disease. The program offers data and trending vitals alerting the agency of change in condition.

Measure: The hospice provides an annual report of numbers of cases and the devices/supports that were provided.

4. Parkside Hospice intends to pursue at least Level 4 status with the we care for Veterans. Program and will employ MSW's with experience in working with Veteran's to employ as a Liaison to act as a resource for the Veterans.

CON Action Numbers: 10786 through 10792

Measure: The annual monitoring report will include progress on the status of the hospice's We Honor Veterans program and the number of veterans recognized in Broward County that meet the criteria for hospice, palliative care, or our SAGE Program.

5. Parkside Hospice will provide a Weighted Blanket Therapy program for patients. This blanket is based on Deep Pressure Touch Stimulation which activates and stimulates the deep pressure touch receptors in a person's body. When the body is stimulated this way, serotonin is released.

Measure: The annual monitoring report will include the number of individuals that participate in the pet therapy program and the results reporting on those it positively impacts the hospice patient and helps with their senses of touch and emotional connection.

6. Employ a music therapist to provide individualized music activities to meet patient needs.

Measure: The hospice provides an annual report of the music therapist's cases.

7. Employ a specially trained social worker to provide patients assistance with their eligibility for financial assistance, including Medicaid.

Measure: The hospice provides an annual report of cases enrolled and programs used.

8. Develop and distribute an annual report of community benefit.

Measure: The hospice develops a report that addresses the priorities for the previous year, services provided by county, feedback from directors and councils, and priorities for the future. Accomplishments by the Community Outreach Program.

9. Contract with a Chaplain for the program to provide spiritual counseling to hospice patients and participate in Bereavement follow up.

Measure: the Hospice spiritual care and bereavement participation quarterly and provide appropriate data reporting.

CON Action Numbers: 10786 through 10792

10. Emergency Preparedness Education and Exercises to ensure in the event of a natural disaster that agency is equipped with the knowledge and tools to act in an emergency.

Measure: We will Monitor outcomes with tabletop exercises as required through regulations.

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

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

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

D. REVIEW PROCEDURE

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

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

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

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

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

E. CONFORMITY OF PROJECT WITH REVIEW CRITERIA

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

1. Fixed Need Pool

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

In Volume 50, Number 23 of the Florida Administrative Register, dated February 2, 2024, the Agency published need for a new hospice provider in Service Area 10 (Broward County) for the July 2025 hospice planning horizon. The applicants are applying to establish a hospice program in response to published numeric need.

SA 10's CYs 2019—2023 hospice admissions by provider are shown in the table below.

CON Action Numbers: 10786 through 10792

**Service Area 10
Hospice Admissions CY 2019—CY 2023**

Hospice	2023	2022	2021	2020	2019*
AccentCare Hospice of Broward County	1,347	1,251	0	0	0
Broward Health Home Health and Hospice (Closed 1/29/22)	0	27	297	281	261
Catholic Hospice, Inc.	1,117	1,120	1,039	967	970
Continuum Care of Broward, LLC	339	358	197	8	0
Hospice by the Sea, Inc.	1,946	2,216	1,907	1,412	1,316
Hospice of Palm Beach County, Inc.	80	96	107	94	66
Promedica Hospice (Broward) f/k/a Heartland Hospice Services	202	187	207	256	287
Seasons Hospice of Broward Florida, Inc.	0	0	1,161	1,373	1,457
Vitas Healthcare Corporation of Florida	6,151	5,637	5,773	6,016	5,775
Total	11,182	10,892	10,688	10,407	10,132

Source: Agency for Health Care Administration Florida Need Projections for Hospice Programs, issued for the referenced time frames with the exception in the "Note" below.

Note: *CY 2019 includes 4,908 July-December 2019 admissions in SA 10 which were not published due to the cancellation of the July 2020 batching cycle.

All applicants provide detailed arguments in support of need for their respective project. These are described below.

AMOR Hospice Care, LLC (CON application #10786), proposes a new hospice program in Broward County SA 10. The applicant references a Florida Agency for Healthcare Administration (AHCA) report published on February 2nd, 2024, which identified a need for one additional hospice program in District 10 by July 2025. AMOR Hospice positions itself as the ideal candidate to address this need.

AMOR Hospice highlights both numerical need and the importance of culturally competent care for a growing and diverse elderly population. AMOR Hospice cites AHCA data indicating a need for 1,245 additional hospice patients in the SA by July 2025. Current providers admitted 11,182 patients in 2023, falling short of projected demand. Broward County's population is projected to grow by 5.23 percent by 2030, with an even sharper increase (23.9 percent) in the elderly (65+) population. The applicant contends this translates to a rising need for hospice services.

AMOR Hospice emphasizes the significant demographic shift within the elderly population. Hispanic and Black populations are growing rapidly, surpassing the Non-Hispanic White population by 2030. AMOR Hospice recognizes the importance of catering to this diverse population. Its focus is on building a culturally competent team and offering services tailored to specific needs positions them well to serve the community.

AMOR Hospice acknowledges that population breakdowns like "Hispanic" or "Black" don't capture the rich cultural tapestry of Broward County.

CON Action Numbers: 10786 through 10792

Broward County boasts a rich cultural tapestry amongst its elderly residents. This diversity presents both challenges and opportunities for AMOR Hospice.

A significant portion of Broward County's elderly population is foreign-born, with a wide range of countries represented. The Black community itself reflects this variety, with residents hailing from the US, Caribbean, and Africa. A substantial number of households speak languages other than English at home.

These demographics highlight potential communication barriers and the need for culturally competent care. AMOR Hospice can address these challenges by:

- **Building a Bi-lingual Bridge:** Developing a staff fluent in multiple languages and offering translated materials ensures clear communication with all patients and families.
- **Culturally Competent Care:** Training staff to understand and respect diverse cultural practices surrounding death and dying fosters trust and effective service delivery.
- **Tailored Services:** Developing programs and approaches that resonate with different cultural backgrounds allows AMOR Hospice to better serve the unique needs of each population group.

The applicant argues that the veteran population within the SA 10 justifies the need for AMOR Hospice's services. AMOR plans to offer community outreach programs and specialized care tailored to veterans' needs. The "We Honor Veterans" program will be a key service to ensure quality end-of-life care for this population. Data is provided showing a projected decline in the veteran population within the SA over the next few years (2025-2028).

The applicant also highlights Broward County's significant Jewish population, and reference data indicating that the Jewish population is larger than national and state averages, and that this population is spread throughout the county. This suggests a need for hospice providers to be prepared to serve the unique needs of this population.

Similarly, the applicant discusses the LGBTQ+ population within the SA. While data is limited, AMOR point to Broward County having the most same-sex couples of any county in Florida. It argues that the LGBTQ+ community requires culturally competent hospice care due to potential discrimination concerns.

The applicant acknowledges that SA 10 has a lower overall death rate than Florida. However, it highlights higher death rates from stroke and HIV disease within the district compared to the state. Data on leading

CON Action Numbers: 10786 through 10792

causes of death in District 10 from 2013 to 2022 is provided. This includes breakdowns by year for heart disease, cancer, other causes, stroke, injury, COVID-19, chronic lower respiratory disease (CLRD), diabetes mellitus, Alzheimer's disease, nephritis, liver disease/cirrhosis, renal disease, Parkinson's disease, suicide, influenza and pneumonia, septicemia, homicide, and HIV disease. Age-adjusted death rates are also presented.

AMOR Hospice analyzed hospice admission data in Broward County for the past three years (2021-2023) and found that existing providers only increased total admissions by 494 during this period. VITAS, AccentCare, and Continuum Care accounted for most of this growth. The closure of Broward Home Health and Hospice also likely contributed by causing patients to transition to existing providers. A table provided details admissions data for each hospice provider in SA 10 for the years 2021, 2022, and 2023. VITAS Healthcare Corp. holds the largest market share, followed by Hospice by the Sea Inc. and Catholic Hospice.

AMOR Hospice argues that the annual growth in admissions by existing providers is minimal, averaging only 247 admissions per year from 2021. The applicant uses this data to suggest that a new provider, like AMOR Hospice, is needed to meet the significant need identified by the Agency for the upcoming year (1,245 admissions for 7/25-6/26). AMOR Hospice acknowledges the difficulty in predicting future admissions for a new hospice provider. It analyzed data on hospice startups in Florida to understand past experiences and focused on a similar case study (Continuum Care) that entered the same SA in 2020. AMOR presents a table showcasing various hospices that entered the Florida market between 2017-2020. The table details year one and year two admissions and market share for each provider.

AMOR Hospice used population projections from BEBR (Bureau of Economic and Business Research) and death rates provided by AHCA to estimate the need for hospice services in the SA over the next three years (2025-2028). It further categorized projected deaths by age group and disease type (cancer and non-cancer). Finally, it applied hospice use rates (percentage of deaths that utilize hospice services) to arrive at a projected number of patients needing hospice care in each category. AMOR Hospice states considered several factors including industry benchmarks, market saturation, and demographics. Based on these factors, AMOR Hospice projects admitting 247 patients in year one and 374 patients in year two. It argues that these figures are well below the overall projected need, leaving ample room for existing providers to continue operating at current capacity.

Arc Hospice of Florida, LLC (CON application #10787) cites the published need and states Broward County faces a rising demand for hospice care. Arc Hospice, a seasoned provider with a proven track record, seeks to address this gap by expanding into SA 10. Broward County's population is projected to surge by four percent by 2029, exceeding the state's average growth. This trend is particularly pronounced among the elderly, with the over-65 population expected to experience a significant 17 percent rise in the same timeframe.

Currently, seven hospice providers serve SA 10, but only two focuses solely on Broward County.

Arc Hospice states it brings a wealth of experience to the table. The applicant has an approved program under development in Florida. Arc contends success in Georgia demonstrates its ability to provide quality care. Arc Hospice prioritizes community outreach and education, ensuring residents are aware of its services and the importance of end-of-life care planning, and it offers specialized services to address common issues faced by elderly patients.

Arc Hospice states its has a proven track record of overcoming cultural, logistical, and accessibility barriers that may prevent people from receiving hospice care. Care coordinators will oversee service delivery, ensuring timely access and collaboration with local health care providers and community resources. By leveraging its experience and commitment to community engagement, Arc aims to bridge the gap in hospice services for Broward County's growing population, particularly the elderly. The applicant is confident in its ability to provide high-quality, culturally sensitive care to those in need.

Arc Hospice argues that its proposed services will address the unmet needs of the SA for hospice care. The applicant outlines its staff training programs, response protocols, and logistical capabilities to deliver quality end-of-life care. Here a list of the key points:

- **Staff Training:** Arc Hospice will train staff in cultural competency, telehealth, collaboration with local providers, transportation and logistics, emergency preparedness, and mental health support.
- **Communication Protocols:** The applicant will establish clear communication protocols for responding to patients and families 24/7, with defined response time standards and call prioritization processes.
- **On-Call Support:** A team of on-call nurses and management staff will be available outside of regular business hours.
- **Quality Improvement:** Arc Hospice will implement a continuous quality improvement program.

CON Action Numbers: 10786 through 10792

- **Flexible Staffing Model:** Arc Hospice will utilize a staffing model that emphasizes adaptability, technology, professional development, and work-life balance.
- **Community Engagement:** Arc Hospice will establish community-based volunteer programs and collaborate with local organizations.
- **Tailored Care Plans:** The applicant will develop interdisciplinary teams to create individualized care plans for patients with diverse needs.
- **Expedited Admissions:** Arc Hospice aims to admit patients within two hours of referral receipt and initiate services within six hours for qualified patients with physician orders.
- **Transportation:** The applicant will coordinate and pay for patient transportation between facilities and the patient's chosen setting.
- **Medication Management:** Arc Hospice will utilize technology to ensure medications are available upon admission and establish contracts with pharmacies for 24/7 access.
- **Durable Medical Equipment:** It will have partnerships with suppliers for prompt delivery of equipment and maintain a car stock for immediate needs.
- **Addressing Barriers:** Arc Hospice acknowledges a study highlighting the need to address barriers beyond funding and resources. It will address communication gaps between providers and patients, cultural sensitivities in care, inadequate knowledge of hospice services, and a poorly integrated system within primary care.
- **Community Outreach:** Arc Hospice has conducted outreach programs and interviews with key stakeholders in underserved communities to understand their needs and disparities in hospice care.

Arc Hospice acknowledges the need to increase access to hospice services and outlines a four-pronged approach to achieve this:

1. **Increasing Knowledge and Awareness:** The applicant plans to raise awareness of hospice care and its benefits through educational campaigns, community engagement activities, and provider education initiatives.
2. **Reducing Disparities:** Arc Hospice will address disparities in hospice utilization by building a presence in underserved communities and recruiting a workforce that reflects the cultural diversity of the SA.
3. **Partnering with Community Stakeholders:** Arc Hospice will collaborate with faith-based organizations, community organizations, and other stakeholders to build trust and promote services.
4. **Culturally Sensitive Care:** Arc Hospice recognizes the importance of cultural sensitivity and will provide training to staff, diversify its

CON Action Numbers: 10786 through 10792

workforce, employ cultural liaisons, and offer culturally relevant information to patients and families. It will also establish an internship program focused on the Caribbean, Hispanic, and African American communities.

Arc Hospice argues that SA 10 would benefit from its unique approach to hospice care which contends has gained it valuable insights from community interactions, allowing it to tailor programs to better meet existing needs.

Arc Hospice believes its services will raise awareness and encourage more residents to utilize hospice care. It aims to streamline the admission process and address any communication gaps that may cause delays. Arc emphasizes collaboration with facilities like skilled nursing homes to ensure a smooth transition for patients. The applicant contends there is a lack of community education on hospice and proposes programs to address this gap. Letters of support from various community organizations and health care providers are included (Exhibit C). These letters highlight the importance of timely access to hospice care and Arc Hospice's commitment to clear communication. Arc Hospice's focus on community engagement, patient choice regarding care location, and culturally sensitive care. Arc's cultural liaison position and disease-specific programs designed to address unmet needs in the community.

Confidence in Arc Hospice's patient-centered approach, specialized programs, and commitment to staff education and collaboration with residential facilities.

The applicant, Arc Hospice, uses data on deaths in SA 10 to argue for the need for its hospice program. Broward County has a high number of deaths annually, ranking second in the state of Florida in 2022 (17,180 deaths). The most significant growth is in non-cancer related deaths among residents aged 65 and over, increasing by over 10,000 between 2017 and 2022. Arc Hospice emphasizes its expertise in serving patients with various end-stage diseases, not just cancer. It points to heart disease as the leading cause of death in Broward County. Arc Hospice argues that its program is necessary to meet the growing demand for hospice care, especially for those with non-cancer related illnesses. The applicant believes it's presence will raise awareness and increase overall hospice utilization in the county.

Arc Hospice states that while inpatient hospice currently appears to be the most utilized option in SA 10, it contradicts national trends where patients desire home-based care. (Based on patients discharged to

inpatient facilities versus home.) The applicant presents several points to support its position, aligning with the concerns raised by community partners like the Area Agency on Aging of Broward County.

National Preference and Cost-Effectiveness: Studies and surveys show a strong preference for home-based hospice care (80 percent according to "Expect the Best" and 70 percent according to Kaiser Family Foundation). Home hospice care is also a more cost-effective alternative to inpatient care.

Improved Quality of Life and Addressing Community Needs: Home hospice allows patients to remain comfortable and surrounded by loved ones, a critical aspect highlighted by Charlotte Mather-Taylor, CEO of the Area Agency on Aging of Broward County. Her letter (Exhibit C) expresses the need for hospice services that respect patient choice regarding care location and address the specific needs of the community.

Arc Hospice acknowledges the challenges of providing adequate care at home but proposes a multi-pronged approach to address them, directly responding to the concerns raised in Ms. Mather-Taylor's letter:

- **Comprehensive assessments:** Individualized care plans will be created based on each patient's specific needs.
- **Care coordination:** Regular communication and collaboration will ensure patients receive the necessary support at home.
- **Family caregiver support:** Training and resources will be provided to help families manage patient care and reduce stress, as Ms. Mather-Taylor emphasized in her letter.
- **Technology utilization:** Remote monitoring, virtual consultations, and symptom management guidance will be offered.
- **Additional therapies:** Occupational and physical therapy will be available if needed.
- **Specialized equipment and supplies:** Arc Hospice will ensure patients have access to necessary equipment at home.
- **24/7 on-call support:** A robust on-call system will provide immediate assistance during emergencies.
- **Community partnerships:** Collaboration with local organizations like the Area Agency on Aging will expand support networks for patients and families.
- **Continuous quality improvement:** Arc Hospice will continuously evaluate and improve its care delivery model based on patient and family feedback.
- **Local hiring emphasis:** Arc Hospice will prioritize hiring local caregivers to reduce barriers to home-based care.

Arc Hospice argues that the growing number of deaths, particularly non-cancer related deaths among the elderly, necessitates innovative hospice programs tailored to specific diseases.

Increase in Non-Cancer Deaths: Broward County has seen a significant rise in resident deaths, with a 12 percent increase from 2017 to 2022 (17,180 deaths). This growth is primarily driven by non-cancer deaths in the 65+ age group, increasing by nearly 1,400 deaths (16 percent) between 2017 and 2022 (Figure 16 & 17).

Shifting Demographics of Hospice Care: Traditionally, hospice focused on terminally ill cancer patients. However, data shows a national trend with only 24 percent of hospice admissions having cancer as the primary diagnosis in 2021 (Exhibit D). Broward County reflects this trend, with heart disease being the leading cause of death, followed by other non-cancer diagnoses like cerebrovascular diseases and chronic lower respiratory diseases (Figure 18).

Need for Disease-Specific Programming: Arc Hospice emphasizes its expertise in serving diverse patient populations. It proposes developing specialized programs for dementia/Alzheimer's, heart disease, pulmonary disease, chronic liver disease, and neurological diseases to address the growing need for non-cancer related hospice care (Figure 18 & 19). Outreach and education initiatives will also be implemented to raise awareness about hospice eligibility for these conditions. Arc Hospice argues for the need for a specialized hospice program for patients with heart disease in SA 10.

High Prevalence of Heart Disease: Heart disease is the leading cause of death in SA 10, accounting for over 22 percent of all deaths in 2022 (Figures 21 & 22).

Underutilization of Hospice for Heart Disease: Data from AHCA shows a concerning underutilization of hospice services for heart disease patients. Less than 600 patients with cardiovascular disease were discharged to hospice in 2022, representing only nine percent of total hospice discharges (Figure 23). The growth in hospice use for this population lags the overall increase in heart disease diagnoses (Figure 23).

Specialized Care Needs: Arc Hospice emphasizes that patients with terminal heart disease have unique care needs compared to patients with other conditions. It proposes a specialized program with an interdisciplinary team to address these needs (e.g., symptom management, patient education).

Arc Hospice argues that there is a gap in end-of-life care for residents of SA 10 with heart disease, which its program aims to fill. The applicant identifies a need for specialized care for patients with non-cancer diagnoses, such as cerebrovascular disease, chronic lower respiratory disease, Alzheimer's disease, and chronic liver disease. Arc Hospice acknowledges that health care professionals may not be familiar with referring patients with non-cancer diagnoses to hospice and proposes a multi-pronged approach to educate them on the benefits of hospice care. It also plans to educate patients and families on hospice eligibility and offer educational resources to referral sources.

Underutilized Option: Studies show that despite the significant physical and emotional burden of CLRD, palliative care options like hospice are underutilized by this population (refer to Exhibit D).

Barriers to Hospice for CLRD: Arc Hospice identifies several reasons why CLRD patients may not receive hospice care, including:

- Uncertainty about prognosis
- Lack of physician training in discussing palliative care with CLRD patients
- Misconceptions surrounding opioid use in patients with lung disease
- Fear of diminishing hope
- Perceived stigma against patients with smoking-related lung diseases

Arc Hospice proposes a specialized program tailored to manage the specific needs of CLRD patients.

Focus on Symptom Management: The program prioritizes managing shortness of breath (dyspnea), a significant source of distress for these patients. The applicant will utilize a combination of medications, breathing exercises, oxygen therapy, and relaxation techniques. Additionally, it will address anxiety, depression, and pain management to improve overall quality of life.

Reduced Hospitalizations: Effective symptom management can decrease anxiety and the need for emergency room visits and hospital stays, allowing patients to remain comfortable at home in their final days.

Arc Hospice offers education and support to both patients and caregivers. This includes culturally matched volunteers, social workers, and spiritual care coordinators. A dedicated respiratory therapist will provide specialized evaluation, treatment, monitoring, and education for patients with CLRD. Arc Hospice emphasizes its comprehensive and multidisciplinary program designed to deliver high-quality end-of-life

CON Action Numbers: 10786 through 10792

care that addresses the physical, mental, and emotional aspects of CLRD. This approach ensures patients with CLRD have access to the specialized care they need.

Arc Hospice argues for expanding its services beyond traditional diagnoses to address the unmet needs of patients with Cerebrovascular Disease (CVD) and Chronic Liver Disease (CLD) in SA 10. Arc Hospice takes a multi-pronged approach to improve end-of-life care for CVD and CLD patients including focusing on educating all parties involved about hospice eligibility for CVD and CLD patients. Arc's interdisciplinary team provides comprehensive care plans addressing physical, emotional, social, and spiritual needs. Pain management and pre-emergency planning are prioritized to ensure patient comfort and informed decision-making. Arc Hospice encourages early exploration of hospice options and advanced care planning to allow for a smoother transition.

By providing specialized care, education, and support, Arc Hospice argues that its program can significantly improve the quality of life for patients with CVD and CLD in SA 10 during this critical time.

Arc Hospice recognizes the unique challenges faced by patients with Alzheimer's disease and dementia at the end-of-life. Its programs offers specialized care that goes beyond traditional hospice services to address these specific needs.

Arc Hospice acknowledges that caregiver stress is a significant concern, with dementia potentially leading to burnout and depression. Arc states that dementia deaths are likely undercounted (Exhibit D). Severe dementia often leads to complications like pneumonia, which may be listed as the primary cause of death on certificates, neglecting the underlying dementia.

Arc's approach prioritizes the care of dementia patients by providing accessible and comprehensive hospice care. The applicant offers specialized training for staff to ensure they are equipped to provide high-quality care for patients with dementia. The program focuses on individualized care plans that are updated regularly to reflect changes in the patient's condition. By reducing hospitalizations and prioritizing comfort, Arc Hospice aims to improve the quality of life for both patients and their families.

Letters of support for Arc Hospice's CON application provide a narrative of a community looking for more comprehensive end-of-life care, particularly for those grappling with chronic illnesses. While existing hospice providers serve a vital role, these letters illuminate potential gaps for specific patient populations. Urologist Elias Atri, MD, emphasizes the

CON Action Numbers: 10786 through 10792

need for "hospice services tailored to the unique needs of the community," particularly for chronic conditions like heart disease, pulmonary care, and Alzheimer's Disease. Dr. Atri highlights the prevalence of these conditions, stating they can be "challenging," and underscores Arc Hospice's "specialty disease programs" as an asset.

Kim Praitano, President/CEO of Gilda's Club South Florida, sheds light on the importance of education and collaboration. Gilda's Club supports patients and families battling cancer, and Praitano highlights the need for "partnerships with community organizations" to ensure "residents are made aware of the benefits of hospice." Statistics from the 2022 Alzheimer's Disease Facts and Figures, included in the applicant's argument, reveal Florida has the second highest prevalence of individuals aged 65 and older with Alzheimer's disease, further emphasizing the potential need for targeted hospice services in this area.

Dr. Peter Antevy, MD, serving as the EMS Medical Director for several fire rescue agencies, commends Arc Hospice's focus on "chronic conditions like heart failure and COPD," noting it represents a "monumental step towards improving end-of-life care quality." Arc Hospice's "interdisciplinary method" encompassing pain and symptom management, along with emotional and spiritual support, is highlighted by Dr. Antevy as crucial for a diverse patient population.

Clifford A. Wolff, Past General Counsel and Board Member for John Knox Village, a Continuing Care Retirement Community, emphasizes Arc Hospice's "integrated continuum of care model" designed to meet a patient's needs at various stages. Wolff highlights the program's focus on building relationships with nursing home staff, allowing for a holistic approach to patient care.

Ronoel Penalver, MD, Family Medicine Physician stresses the importance of giving patients "the choice of their preferred care setting," particularly at the end-of-life. Penalver believes Arc Hospice's "commitment to providing high-quality in-home hospice care" would greatly benefit the community. Arc Hospice seeks to establish a new hospice program specifically designed to address the needs of underserved minority communities in Broward County. These communities, including Caribbean, Hispanic, and African American populations, often face significant barriers to accessing hospice care due to a lack of knowledge, cultural sensitivities, language limitations, and distrust in the medical system.

Arc Hospice cites concerning statistics and research articles, such as those published in the Journal of the American Medical Association (JAMA), which highlight racial disparities in hospice use. Additionally,

CON Action Numbers: 10786 through 10792

reports from the National Hospice and Palliative Care Organization (NHPCO) document the underrepresentation of minorities in hospice care. Letters of support, like the one from Dr. Farzanna Haffizulla, M.D., further emphasize the specific challenges faced by the Caribbean community.

To bridge these gaps, Arc Hospice proposes a multi-faceted approach. Educational campaigns, collaborative efforts with faith-based groups and community organizations, and training programs for health care providers aim to raise awareness and understanding of hospice care within these communities. Arc Hospice also recognizes the importance of cultural competency. By hiring a diverse workforce, providing cultural competency training for all staff, and establishing a dedicated Cultural Liaison position, Arc Hospice strives to create a more inclusive environment that respects the unique needs and traditions of each patient. Furthermore, bilingual staff, materials, and volunteers (particularly in Spanish and Creole) will address language barriers and ensure clear communication.

Arc Hospice acknowledges the need to build trust within these communities. Partnerships with community leaders and organizations are central to this effort. By actively engaging with these groups and tailoring outreach programs to address specific cultural concerns, Arc Hospice hopes to foster trust and encourage greater utilization of hospice services. Finally, Arc Hospice emphasizes the importance of ongoing monitoring and evaluation to ensure its services effectively meet the needs of these underserved populations.

The applicant argues that SA 10 has a significant and growing Hispanic population with a projected increase of 10 percent by 2030. This growth is expected to be particularly pronounced among the elderly (65+), with a projected increase of 35.8 percent in the same timeframe. This growth outpaces the projected growth for the elderly Hispanic population in Florida (32 percent).

The applicant highlights that the Hispanic community is often underserved in health care, including hospice care. This is attributed to factors such as cultural barriers, lack of knowledge about end-of-life care, limited access to regular medical care, and language barriers. Additionally, undocumented immigrants may face further challenges in accessing hospice services.

The applicant presents data to suggest that a substantial number of Hispanic residents in SA 10 could benefit from hospice care. However,

CON Action Numbers: 10786 through 10792

Arc Hospice point out that only 20 percent of hospice patients discharged in 2022 were Hispanic, representing less than 3 percent of all discharged Hispanic patients.

Arc Hospice argues that SA 10 has a substantial Black/African American population, with a projected growth of over 22 percent by 2030 for the elderly (65+) age group. This growth is stronger than the projected growth for the elderly Black/African American population in Florida (11 percent).

Like the Hispanic community, the applicant contends that the Black/African American community is underserved in health care, including hospice care. Contributing factors include cultural barriers, lack of knowledge about end-of-life care, limited access to regular medical care, and a potential cultural apprehension towards stopping curative treatment.

The applicant suggests that a significant number of Black/African American residents in SA 10 could benefit from hospice care. However, data from AHCA shows that only 19 percent of patients discharged to hospice in 2022 were Black/African American, while this demographic accounted for 32 percent of all discharged patients that year. In contrast, the White cohort, representing 59 percent of all discharged patients, comprised roughly 75 percent of patients discharged to hospice.

Broward County's diverse population faces a challenge when it comes to end-of-life care. The five quotes from letters of support below paint a compelling narrative for Arc Hospice's application, highlighting the critical need for culturally sensitive hospice services.

Felipe Pinzon, President of Hispanic Unity of Florida, representing over a third of Broward's residents, emphasizes the underutilization of hospice within the Hispanic community: "In general, hospice care is a foreign concept within the Hispanic culture..." Pinzon highlights Arc Hospice's commitment to bridge this gap by "working with local leaders...to best understand which hospice services would be most meaningful to the Hispanic population."

Reverend Father Michael Calderin, representing Saint Jude Ministries, echoes the need for culturally sensitive care, particularly for 9/11 first responders. He highlights Arc Hospice's plans to "provide specialized services for common illnesses faced by first responders of 9/11..."

Randy Colman, CEO of Goodman Jewish Family Services, emphasizes the needs of the county's Holocaust survivor population, a significant portion of the US total. He finds Arc Hospice "attuned to the needs of

Holocaust survivors" and its "sensitivity to address the needs of these individuals."

Rabbi Yochanon Klein of Healing Hearts finds the applicants approach "commendable" - "Arc Hospice has demonstrated a commendable commitment to collaborating with community spiritual leaders..." Klein emphasizes the importance of clergy involvement "ensuring that culturally specific needs are met..."

Germaine Smith-Baugh, President of the Urban League of Broward, highlights Arc Hospice's efforts to "cultivate its relationship within our underserved communities..." This includes "partnering with local churches and other organizations..." and "recruiting staff from within the communities it will serve."

Arc Hospice recognizes a critical gap in Broward County: access to end-of-life care for the homeless and low-income populations. With a staggering number – nearly 2,500 in 2023 – Broward has the second-highest homeless population in Florida.

Arc Hospice's proposal outlines a multi-pronged approach to reach these underserved communities.

Arc Hospice plans to forge strong partnerships with organizations already serving the homeless. This includes groups providing meals, shelter, and other support services. By working together, it can tailor hospice care to fit the unique needs of this population, whether in emergency shelters, safe havens, or transitional housing.

The Broward County Homeless Initiative Partnership (HIP) and the Homeless Continuum of Care Advisory Board (HCoC) are key partners. Arc Hospice will collaborate with these organizations to ensure a seamless continuum of care for the homeless as they approach the end-of-life.

The picture of homelessness in Broward is complex. While some find refuge in shelters, a significant portion – almost 900 people in 2023 – live unsheltered. Arc Hospice understands this reality and is committed to reaching these individuals as well.

Arc Hospice sees an opportunity to bridge the gap for low-income residents who often struggle with navigating the health care system. Through collaboration with the Broward County Department of Health, the applicant will provide much-needed support for these individuals, particularly those facing advanced illness. Arc states it will involve staff with expertise in community resources, end-of-life and grief care,

CON Action Numbers: 10786 through 10792

facilitation of advance directive discussions, caregiving and education. These staff members will serve as a central point of contact for both the Department of Health's main campus and its satellite clinics throughout the county. Importantly, Arc Hospice will also develop a targeted hospice program to deliver care directly to patients in shelters, safe havens, and transitional housing.

Arc contends its dedication extends beyond programs and partnerships citing its pledge to allocate \$10,000 annually for five years to organizations supporting Broward's unfunded and undocumented residents. These funds will help ensure access to a wider range of medical services for this vulnerable population.

Arc Hospice's application acknowledges the diverse needs of the homeless population – a mix of age, ethnicity, and veteran status. This understanding is crucial for providing culturally sensitive and holistic end-of-life care. By addressing the gaps in access to care, Arc Hospice aims to ensure that all residents of Broward County, regardless of income or housing status, can receive high-quality, compassionate care at the end-of-life.

Arc Hospice states it understands veteran's unique needs and is committed to providing them with compassionate, specialized care.

Arc states its staff is trained to recognize the impact of military experience on a veteran's approach to end-of-life care. This includes:

- Understanding the psychological impact of service, including PTSD and trauma responses.
- Recognizing the importance of military culture and experiences.
- Creating a safe, supportive environment that honors veterans' service.

Arc Hospice is actively engaged in building partnerships with veteran service organizations. This collaboration ensures veterans, and their families receive the specific support they need. Arc's initiatives include the We Honor Veterans Program, trained veteran volunteers to connect with patients who share a military background, fostering camaraderie and facilitating emotional processing and Arc plans to develop a comprehensive program specifically tailored to veterans' end-of-life needs.

Broward County has a significant population of aging veterans. Arc Hospice recognizes the increased need for hospice care among this group. It will:

- Collaborate with the Department of Veterans Affairs (VA) to ensure a seamless continuum of care.

CON Action Numbers: 10786 through 10792

- Provide support for families of veterans, including guidance with health care decisions and connections to beneficial resources.
- Offer culturally sensitive care that acknowledges the sacrifices veterans have made for our nation.

SA 10 Veterans Statistics

- Broward County is home to roughly 76,000 veterans, with nearly half being over 65 years old.
- This aging population will face a growing need for end-of-life services.
- Arc Hospice is committed to bridging the gap and ensuring all veterans receive the respectful, compassionate care they deserve.

A letter from Dr. Nancy Klimas, a physician with extensive experience treating veterans, highlights the critical need for Arc Hospice's specialized program. Dr. Klimas emphasizes the unique challenges veterans face and the importance of having a hospice provider who understands these complexities. By addressing the specific needs of Broward County's veterans, Arc Hospice is poised to make a significant difference in the lives of those who have bravely served our country. Arc states it goes beyond traditional hospice care by offering a comprehensive, integrated approach that addresses the physical, emotional, social, and spiritual needs of patients and their families. It does not take a one-size-fits-all approach. Its centralized admission process brings together the patient, family, physicians, case managers, and other relevant parties to develop a personalized care plan.

Arc Hospice focuses on four key areas to provide a truly holistic experience these include:

- 1. Physical Needs:** Effective pain and symptom management are essential for a patient's comfort and well-being. Arc Hospice prioritizes keeping patients comfortable so they can focus on other important aspects of life.
- 2. Emotional Needs:** Facing a terminal illness can be emotionally challenging. Arc Hospice provides support in dealing with anxieties, fears, and other emotional burdens. It can also help patients and families address difficult topics like death and legacy.
- 3. Social Needs:** Patients may feel isolated or disconnected during their illness. Arc Hospice helps patients maintain social connections with loved ones and even assists with fulfilling "bucket list" wishes.
- 4. Spiritual Needs:** Spiritual needs are not always religious in nature. Arc Hospice offers support for spiritual reflection, fostering a sense of peace and closure for patients and families.

CON Action Numbers: 10786 through 10792

Arc Hospice recognizes that end-of-life care is just one part of a larger journey. Its integrated system can connect patients with various care options, including palliative care, long-term care, skilled nursing facilities, ALFs, rehab hospitals and home health agencies. Arc contends that by offering a seamless continuum of care, it ensures patients receive the right level of support at each stage of their illness.

Arc Hospice's commitment to patient-centered care fosters a sense of hope and dignity for patients and families during a difficult time. The applicant's dedication to quality care and comprehensive support makes them a valuable resource for anyone facing the challenges of a terminal illness. Arc Hospice presents several letters of support that emphasize its commitment to patient-centered care. Dr. Peter Antevy highlights the applicant's interdisciplinary approach that includes pain and symptom management alongside emotional and spiritual support for patients and families. Pamela Kane and Barbara Yanez-Artiles also commend this holistic approach, focusing on both medical care and emotional and spiritual well-being.

Dr. Antevy and Barbara Yanez-Artiles specifically mention Arc Hospice's specialized programs for chronic conditions, such as heart failure, COPD, and Alzheimer's disease. These programs are believed to bring a higher level of expertise to patient care. Arc Hospice expresses its readiness to expand services and collaborate with health care facilities like nursing homes throughout SA 10. Data presented indicates there are 32 nursing homes with a total of 4,382 licensed beds in the SA. This suggests a significant population that could potentially benefit from hospice care. Arc Hospice argues its presence in nursing homes would significantly benefit both residents and facilities. It emphasizes collaboration and communication as key to quality care. This includes establishing clear communication channels, regular meetings, and involving nursing home staff in developing comprehensive care plans. Arc Hospice acknowledges concerns about inconsistent staffing raised during the needs assessment. It addresses this by assigning dedicated staff to each nursing home, ensuring continuity of care, and fostering better collaboration with nursing home personnel.

Recognizing the emotional impact of end-of-life care, Arc Hospice offers ongoing bereavement support to both residents and nursing home staff. It also has a specialized program for dementia care, outlining a patient-centered approach built on trust and collaboration. Arc Hospice offers educational resources to nursing home staff on various end-of-life care topics, improving their knowledge and ability to support residents. Additionally, Arc Hospice emphasizes a collaborative approach built on mutual respect for the expertise of both hospice and nursing home staff.

CON Action Numbers: 10786 through 10792

Arc highlights the advantages its services offer to nursing homes, which include access to its network, staff availability, medication and supply provision, potential reduction in hospital admissions, pain management expertise, physician consultations, and support with daily living activities. The applicant also takes responsibility for psychosocial needs related to the terminal diagnosis and assist with regulatory compliance. Arc Hospice emphasizes its existing relationships with nursing homes in the SA, aiming to improve access to high-quality care for patients with high acuity needs. It has established a partnership with Quantum Healthcare Group, a network with over 430 beds across three Broward County facilities, who have expressed willingness to provide general inpatient beds for Arc Hospice patients. The applicant notes its support letter from Wilton Manors Health and Rehabilitation Center, a Quantum Healthcare Group facility, which cites its confidence in Arc's quality of care provided and a desire for improved communication and collaboration between hospice and nursing home staff. Wilton Manors highlights the challenges they face with inconsistent staffing from existing hospice providers, which disrupts timely care and communication.

Arc Hospice stands out with its commitment to:

- Building strong relationships with nursing homes.
- Consistent staffing to ensure timely care and communication.
- Expanding services like complementary therapies and grief support.
- Serving minority communities disproportionately affected by hospice needs.

Letters from administrators and health care professionals in skilled nursing facilities (SNFs) endorse Arc Hospice's application, highlighting the need for comprehensive end-of-life care within these facilities. These include Ken Angel, Administrator, Glades West Rehabilitation and Nursing Center, emphasizes the limitations of their services and the need for specialized hospice care. Belkin Munoz, Director of Nursing, highlights the importance of comfort, dignity, and access to expert care for residents. Steven Jeger, CEO, recognizes the complex needs of dialysis patients in SNFs, particularly as they approach end-of-life care. He sees Arc as a vital resource for providing compassionate support and facilitating a smooth transition to palliative care and emphasizes the value of Arc Hospice's interdisciplinary approach for holistic patient care.

Arc Hospice argues that collaborating with nursing homes offers significant benefits for residents. It cites a study published in the Journal of the American Medical Directors Association titled "The Effects of Hospice on Hospitalizations of Nursing Home Residents."

Key findings of the study:

- Nursing homes with higher rates of hospice use have residents with a lower risk of hospitalization in their final 30 days of life, regardless of individual hospice enrollment.
- The authors suggest that exposure to hospice care improves the overall skillset of nursing home staff in providing end-of-life care to all residents.
- The study identifies a "spillover effect" where even non-enrolled residents benefit from the presence of hospice in the facility, and an "expertise effect" where enrolled residents receive even better care.
- Increased collaboration between hospice and nursing home staff is seen as key to:
 - Improved communication.
 - More effective management of potentially avoidable hospitalizations for both hospice and non-hospice residents.
 - Earlier recognition of terminal illness and initiation of palliative care.
 - Earlier hospice enrollment and potentially lower hospitalization rates in the final days of life.

Arc Hospice states it recognizes the importance of collaboration with hospitals to improve end-of-life care for patients in SA 10. Arc Hospice's strategy focuses on two key areas: establishing a palliative care program and fostering stronger relationships with hospital staff. Arc will introduce a comprehensive palliative care program within partnering hospitals. This program will concentrate on symptom management and improving quality of life for seriously ill patients, regardless of their prognosis. Hospital staff will receive education on hospice and palliative care, empowering them to make informed decisions and facilitate earlier hospice enrollment for appropriate patients. Arc Hospice hopes to raise awareness of hospice as a viable and valuable option for patients with life-limiting illnesses. The applicant indicates studies suggest that integrating hospice care can lead to significant cost savings by reducing unnecessary hospital admissions and procedures. Further, by providing personalized care plans that address patient preferences, Arc aims to increase overall satisfaction with end-of-life care.

Timely referrals to the hospice are cited as a concern and Arc plans to address this by educating physicians and clinical staff about the benefits of hospice, encouraging them to consider it as an option for appropriate patients earlier in the course of their illness. Arc sees itself as a bridge in the fragmented health care system. The applicant will work to educate patients, families, and health care professionals about hospice and its role in end-of-life care. Additionally, it will collaborate with hospitals to ensure patients are placed in the most appropriate care setting based on

CON Action Numbers: 10786 through 10792

their individual needs. Finally, Arc Hospice offers bereavement services to support families through the grieving process, providing them with the resources they need to cope with loss.

By working together, Arc Hospice and area hospitals can create a more comprehensive and cost-effective approach to end-of-life care, ensuring patients receive the support and compassion they deserve during this difficult time.

Arc cites its comprehensive plan to promote education and training related to hospice care. A key focus is educating physicians, nurses, social workers, discharge planners, and staff at assisted living/nursing facilities about the benefits of hospice care. The applicant recognizes that these referral sources act as gatekeepers to hospice information and its understanding is crucial for increasing appropriate and timely referrals. To address this, a multi-faceted, community-specific education program will be initiated in SA 10, building on existing communication channels within the community. The program will provide tools and materials to help referral sources, including physicians, determine eligibility for hospice care, with a particular emphasis on non-cancer diagnoses like dementia, heart diseases, and lung diseases, which have traditionally been less associated with hospice care.

Furthermore, the applicant is committed to providing internship opportunities to students in nursing, gerontology, social work, music therapy, and pastoral counseling programs within the SA. This initiative will be supported by an annual funding commitment of \$15,000 for at least the first five years of operation, underscoring the applicant's dedication to fostering education and practical experience in the hospice field. (Refer to Schedule C).

The applicant also places significant importance on continuing education for its staff, specifically to skilled nursing staff (CNA, LPN, RN, and APN), and Arc pledges to sponsor hospice and palliative care certifications for these roles. An annual funding of \$15,000 will be allocated for at least the first five years to support staff certifications. Moreover, the applicant encourages staff to maintain ongoing memberships in hospice organizations and participate in continuing education courses, further ensuring the provision of high-quality services to patients and their families. A comprehensive staff training plan is outlined, encompassing orientation, onboarding, continuing education, and in-service training through various methods, including an online education program through Relias Learning, in-house education, workshops, seminars, coaching, mentoring, and certification programs.

Arc emphasizes a multi-pronged approach to education, targeting not only referral sources but also investing in comprehensive staff training and development, as well as providing internship opportunities to foster practical experience and knowledge in the hospice field. Arc Hospice presents a comprehensive plan for integrating information systems and technology to enhance hospice care delivery in SA 10. A key component is the implementation of an Electronic Medical Record (EMR) system to create a seamless continuum of care from the clinical perspective. The EMR will address both administrative and clinical needs, leading to improved care quality, increased employee satisfaction, and financial benefits. Benefits of the EMR system include decreased expenditures through cost avoidance, such as reduced hospital admissions due to better care management, improved program oversight with real-time and remotely accessible documentation, identification and monitoring of best practices, immediate access to patient records, improved administrative oversight and proactive response to patient problems, improved documentation quality, consistency and accuracy, improved staff satisfaction and retention, easier work processes, and the ability to track and trend quality data for timely audits.

Furthermore, the applicant plans to implement Palliative Pharmacy Solutions (PPS) Pharmacy Benefits Management (PBM), a web-based mobile pharmacy application. This technology enables ordering, reconciling, and delivering medications before patient discharge, ensuring availability at home upon arrival. Medication management is an integral part of the hospice interdisciplinary team approach, and the PBM is a key element in ensuring patients have access to medications essential for managing symptoms and maintaining comfort. Arc Hospice will establish contracts with a PBM and local 24/7 pharmacies to guarantee timely medication delivery, fostering a seamless process for patients and families.

The applicant emphasizes using technologies and management systems to improve care throughout SA 10, enhance access to hospice services, and provide a high level of integration with health care facilities, providers, and community organizations. Arc contends its project will benefit the health care system through an emphasis on hospice linkages and enhancing access to hospice services and programs.

Mission and Vision

Arc Hospice has clearly defined its organizational mission and vision to guide its operations in providing end-of-life care services. The applicant states that Arc Hospice's mission is to deliver compassionate, high-quality hospice care to individuals facing life-limiting illnesses, while

CON Action Numbers: 10786 through 10792

supporting their families with dignity, respect, and understanding during this challenging time.

Furthermore, Arc Hospice's vision is to create a supportive and dignified environment where both patients and their loved ones can find comfort and peace as they confront life's greatest challenges associated with terminal illnesses.

To achieve this mission and vision, the applicant outlines the following goals for Arc Hospice:

- Provide comprehensive, best-in-class end-of-life care that holistically addresses the physical, emotional, and spiritual needs of patients and their families.
- Increase access to culturally competent hospice care for underserved communities, including Black/African American, Hispanic, Caribbean, and Jewish populations.
- Foster an environment of respect and caring that honors the wishes of the patient and their family members.
- Educate families and provide resources on the physical and emotional aspects of end-of-life care.
- Collaborate with other health care providers to ensure the best possible care for patients, families, and the community.
- Offer support and advocacy for individuals facing life-limiting illnesses.
- Operate in full compliance with all applicable laws, statutes, and regulatory requirements governing hospice care.

Arc Hospice clearly articulates its commitment to its mission, vision, and goals, which will guide the organization in delivering high-quality, compassionate hospice services to meet the needs of terminally ill patients and their families in a dignified and supportive manner.

The applicant states that to deliver the highest level of quality care to terminally ill patients and their loved ones, Arc Hospice cultivates the following core values:

- **Quality Care:** Arc Hospice believes in an unwavering commitment to providing quality care for all stakeholders - patients, families, the community, and its own staff members.
- **Compassion:** Compassionate care is the essence of Arc Hospice's existence and operations. It values human dignity and strives to do the right thing for the right reasons, which differentiates Arc Hospice from other hospice providers.

CON Action Numbers: 10786 through 10792

- **Competence:** Competent care is the essential first step to delivering compassionate care. Arc Hospice prides itself on its competence, which gives it a leading edge and allows it to be cost-competitive with other credible providers.
- **Community:** Community support is Arc Hospice's ultimate advantage in providing compassionate care. It enables the organization to constructively enlist collaborative support from volunteers and other community entities, building capacity to meet community needs.
- **Creativity:** Arc Hospice values creativity to tap into the brilliance of individuals and the community, generating ideas to continuously improve compassionate care amidst any challenges that may arise.

Arc Hospice further states that it is committed to providing health care to those in need and improving the health of all patients, while recognizing that each patient and family has their own distinct goals for care. This patient-centered approach is essential in hospice care. Approval of Arc Hospice in SA 10 is consistent with and supports its mission, vision, goals, and values.

Improving Education about Hospice

One of the key community benefits highlighted is improved education and understanding about hospice care resources available to physicians, staff, patients, and health care facilities. The applicant states that Arc Hospice is dedicated to educating these stakeholders about hospice, ensuring it is part of an informed team delivering quality end-of-life care.

Arc cites the usual hospice topics which include:

- Death, dying, and bereavement processes
- Overview of hospice history, types of care, venues, and benefits compared to curative care
- Hospice eligibility requirements and appropriateness for various life-limiting diagnoses
- Hospice service expectations and reimbursement processes
- Advance care planning tools like directives, living wills, health care power of attorney
- Best practices in pain management and symptom management for end-of-life patients
- Caregiver support strategies for those caring for hospice patients

By providing this education, Arc Hospice aims to enhance health care professionals' knowledge and utilization of hospice services in SA 10 contending improved understanding can help ensure patients and

families receive timely, appropriate referrals to hospice when curative treatment is no longer effective.

The applicant emphasizes ongoing involvement and face-to-face interactions with physicians, clinicians, patients, and families to integrate hospice into the continuum of care and enhance quality of life for those facing terminal illnesses.

Overall, approval of Arc Hospice is positioned to fill educational gaps, facilitate open conversations about end-of-life care options, and ultimately improve access to high-quality hospice services for the community in SA10.

Palliative Care Program

Arc Hospice has implemented a comprehensive approach centered on palliative care to support patients and families facing life-limiting illnesses. A key aspect is educating the community about the benefits of palliative care in improving quality of life for the seriously ill, beyond just end-of-life care. This increased awareness helps dispel misconceptions.

The palliative program emphasizes collaborating with local health care providers, social services, and community organizations. These partnerships facilitate earlier access to palliative services for patients, enhancing quality of life, reducing hospitalizations, and enabling seamless transitions between care levels.

Additionally, the program engages community volunteers interested in assisting patients and families at all stages of life-limiting illnesses. Outreach efforts include providing educational resources, hosting support groups and workshops, and utilizing social media to raise public understanding about hospice and palliative care advantages.

Education and Training of Future Clinicians

Arc Hospice recognizes the significance of educating and training future clinicians in hospice and palliative care to meet the growing demand for these services. To address this need, Arc Hospice has proposed a collaborative partnership with Nova Southeastern University (NSU). This alliance aims to provide high-quality field placement opportunities for students enrolled in NSU's various health care professions degree programs.

The proposed collaboration will expose students from disciplines such as allopathic medicine, osteopathic medicine, nursing, health care sciences, pharmacy, psychology, nutrition, and social work to end-of-life palliative

CON Action Numbers: 10786 through 10792

care and clinical hospice care settings. Students will gain invaluable hands-on experience working with interdisciplinary care teams and directly engaging with hospice patients and their families.

Furthermore, this partnership will facilitate the expansion of research and educational opportunities in the realm of hospice and palliative care. By combining the expertise of university faculty and hospice care professionals, specialized training programs and workshops can be developed to cater to the unique needs of hospice patients and their loved ones.

The collaboration between Arc Hospice and NSU aims to foster a holistic approach to increasing access to comprehensive interdisciplinary care for hospice patients, encompassing medical, emotional, spiritual, and social support. This synergy will leverage the combined knowledge and resources of both institutions.

Additionally, the partnership will provide networking and career development opportunities for students interested in pursuing careers in hospice care or related fields. This includes potential job placements, internships, and mentorship programs with hospice care providers.

Moreover, the collaboration will facilitate community outreach and education initiatives led by university and hospice care teams. These efforts will raise awareness about end-of-life care options, advance care planning, and the availability of palliative care services.

The partnership promises mutual benefits for both NSU students and Arc Hospice patients. Students will have access to skilled and motivated student interns, research collaborations, and continuous professional development opportunities for staff members. Conversely, Arc Hospice patients will benefit from increased access to qualified care teams, specialized care, and resources tailored to individual patient needs and preferences.

Ultimately, this collaboration between Arc Hospice and NSU aims to address the growing need for hospice care services in the local community by providing skilled professionals, resources, and support. By fostering a comprehensive educational and training environment, the partnership will contribute to the development of a well-prepared workforce equipped to deliver high-quality hospice and palliative care services.

A Coordinated Curriculum for Improved Care

The program will create a standardized curriculum across various health care disciplines at NSU, encompassing medicine, nursing, psychology, and health care sciences. This holistic approach aligns with the vision of Dr. Naushira Pandya, Chair of the Department of Geriatrics at NSU, who emphasizes the importance of a "multidisciplinary team" for quality patient-centered care. The curriculum will address critical topics such as life-limiting illnesses, palliative care, death, and dying, filling a critical need identified by Dr. Marie Florent-Carre, Chair of the Department of Rural and Urban Underserved Medicine at NSU.

Focus on Underserved Communities: A cornerstone of the program is its focus on underserved populations. Studies by NSU's Dr. Stefanie La Manna, Dean of the College of Nursing, highlight the need for "better-educated practitioners" to make hospice less scary for these communities. Arc Hospice recognizes the importance of cultural sensitivity, echoing a sentiment expressed by Reverend Father Michael Calderin, Senior Pastor at Saint Jude Ministries. The program will ensure educational materials are accessible and address cultural nuances to effectively reach diverse communities.

Field Placements and Increased Awareness: The program will offer valuable field placement experiences for NSU students, allowing them to gain practical experience working with patients and families receiving hospice care. This aligns with the mission of HCA Florida University Hospital, as conveyed by CEO Madeline Nava, to reach patients and families who may not be familiar with hospice. Increased awareness of hospice as a viable option is another key goal, as highlighted by Dr. Irving Rosenbaum, Vice President for Operations at NSU's Health Professions Division.

Expected Outcomes: By enhancing education for health care professionals, the program expects to see earlier and more appropriate hospice referrals, ultimately improving the quality of care for patients with life-limiting illnesses. Additionally, statistics cited by Arc Hospice suggest that integrating hospice care can lead to significant cost savings by reducing unnecessary hospital admissions and procedures. Most importantly, patients and families will benefit from a more comprehensive understanding of hospice, empowering them to make informed decisions and receive the support their need during this difficult time.

Strong Community Support

Letters of support from prominent figures in the Broward County health care community underscore the critical need for this program. These figures include:

- Dr. Naushira Pandya, Chair of the Department of Geriatrics at NSU, emphasizes the importance of a "multidisciplinary team" for quality patient-centered care.
- Dr. Marie Florent-Carre, Chair of the Department of Rural and Urban Underserved Medicine at NSU, highlights the need for better education in hospice for underserved populations.
- Dr. Stefanie La Manna, Dean of the College of Nursing at NSU, whose research emphasizes the need for "better-educated practitioners" to make hospice less scary for underserved communities.
- Reverend Father Michael Calderin, Senior Pastor at Saint Jude Ministries, who emphasizes the importance of cultural sensitivity in outreach efforts.
- Madeline Nava, CEO of HCA Florida University Hospital, whose mission aligns with raising awareness of hospice as a viable option.
- Dr. Irving Rosenbaum, Vice President for Operations at NSU's Health Professions Division, who highlights the importance of increased awareness of hospice.

These letters collectively emphasize the critical need for community education, collaboration between institutions, and culturally sensitive outreach efforts. Arc Hospice believes this collaborative effort with NSU will significantly improve the quality of end-of-life care for underserved populations in Broward County.

Service Intensity Program

Arc Hospice's unique Service Intensity Program sets them apart by exceeding national standards and ensuring patients receive the support they deserve. This program focuses on providing intensive support during a patient's last seven days of life.

General Objectives:

- **Rapid Response:** Every referral receives hospice engagement within two hours, 24/7.
- **Unwavering Commitment:** We meet all patients' needs regardless of race, payor source, or time of day.
- **Personalized Care:** In-person visits ensure eligibility and allow us to tailor our services to each patient's wishes.
- **Going Above and Beyond:** Our program offers interventions not covered by Medicare, such as increased visits from chaplains, CNAs, and volunteers.

Service Intensity Specifics:

- **Goal of 50 percent Utilization:** We aim to utilize 50 percent of the allotted Service Intensity Add-On units (8 out of 16 visits per day), exceeding the national average significantly.
- **Daily Support:** All patients will receive daily visits from CNAs, chaplains, and social workers (upon approval), ensuring emotional and physical comfort.
- **Extended Visits:** Nursing visits occur twice daily, lasting at least an hour each. Social work visits are encouraged to run for two hours.
- **Volunteer Companionship:** A dedicated volunteer pool ensures patients are never alone and families receive additional support.
- **Expert Staff:** Our clinical managers and schedulers are extensively trained to manage Service Intensity and identify patients nearing the end-of-life.
- **Open Communication:** Clear communication is maintained through various channels to ensure all staff are aware of a patient's declining condition.

Lack of Comprehensive Palliative Care

Arc Hospice identifies a lack of comprehensive palliative care as a critical gap in SA 10. According to Dr. Stefanie La Manna, Dean and Associate Professor at Nova Southeastern University, and Ms. Madeline Nava, CEO of HCA Florida University Hospital (Exhibit C), indicate that there is a particular need for a program that addresses this.

Arc Hospice's Integrated Model of Palliative Care

Arc Hospice proposes to fill this void with its program. This unique approach weaves palliative care principles throughout a patient's health care journey, from diagnosis onwards, rather than solely focusing on end-of-life care. Dr. La Manna and Ms. Nava's insights suggest this integrated approach is precisely what SA 10 is missing.

Arc Hospice argues this program will offer a more holistic experience for patients. It will not just address the physical aspects of illness, but also the emotional, social, and spiritual needs of patients and their families. By managing symptoms and offering support early on, the applicant believes it can potentially reduce unnecessary hospitalizations and improve the overall well-being of the community.

Arc Hospice highlights the strengths of its program, emphasizing the expertise of its interdisciplinary team, which includes physicians, nurses, social workers, and spiritual counselors. This team works collaboratively to craft personalized care plans that adapt to the evolving needs of each patient. The organization also invests heavily in ongoing staff education,

ensuring its team is equipped with the latest knowledge and best practices.

Integration with Existing Healthcare Providers

Arc Hospice describes efforts to build strong communication bridges, establish streamlined referral mechanisms, and participate in joint training sessions. These initiatives aim to foster a cohesive care approach that benefits patients transitioning between different health care settings.

Early identification of patients who could benefit from palliative care is crucial, according to Arc Hospice. It outlines a multi-pronged strategy that involves training other health care providers to recognize early signs and symptoms, strengthening referral systems through collaboration with specialists, and educating patients and caregivers about the importance of early intervention. Additionally, Arc Hospice proposes a fast-track system for patients with early-stage heart disease or cancer to access their palliative care services swiftly.

In conclusion, Arc Hospice argues that its Integrated Model of Palliative Care, combined with its focus on early identification and strong collaboration with existing health care providers, positions it to effectively address the unmet need for comprehensive palliative care services in SA 10. This approach, as highlighted by Dr. La Manna and Ms. Nava, promises a more holistic and patient-centered experience, potentially improving the quality of life for patients and its families.

Commitment to Improving Patient and Family Satisfaction

Arc Hospice emphasizes its commitment to this issue in SA 10 through its established palliative care program. The program is rooted in the integrated model, which focuses on providing holistic care throughout a patient's illness journey.

Key Strategies include:

- Patient-Centered Care
- Open Communication & Education between the hospice team, patients, and families.
- Compassionate & Competent Staff
- Pain & symptom management to ensure patient comfort and quality of life.
- Psychosocial & spiritual Support to address the emotional and spiritual needs of patients and families.
- Family Involvement is encouraged to be part of the decision-making process regarding the patient's care plan.
- Continuity & Feedback are actively sought from patients and families for continuous improvement.

CON Action Numbers: 10786 through 10792

- Bereavement support and grief counseling are offered to help families cope with loss.
- Ongoing evaluation of the care team's performance and implementing of quality improvement initiatives ensures the highest level of patient and family satisfaction.

Transportation Challenges

Arc Hospice acknowledges that transportation challenges can be a barrier to receiving hospice care in SA 10. To address this issue, it proposes a two-pronged approach:

- 1. Partnerships:** Arc Hospice plans to collaborate with local transportation providers and community organizations.
- 2. Financial Allocation:** Arc Hospice dedicates \$15,000 per year for three years to directly fund patient and family transportation needs in situations where transportation is a barrier to receiving hospice care within SA 10. (Refer to Schedule C)

Mental Health Challenges

Arc acknowledges the challenge of finding hospice and palliative care services for patients with mental illnesses in SA 10.

Prevalence of Mental Health Issues:

- The applicant cites studies highlighting the high prevalence of depression, anxiety, and delirium among terminally ill patients, particularly the elderly.
- The applicant emphasizes that these conditions are often underdiagnosed and undertreated, hindering "quality dying."

Arc Hospice's Approach:

- Arc Hospice positions itself as qualified to serve patients with mental illnesses alongside their terminal illness.
- Collaboration with area mental health providers is a key strategy.
- Arc Hospice's interdisciplinary team, including nurses, social workers, and others, will conduct comprehensive assessments to evaluate a patient's mental health status.
- Based on the assessment, Arc Hospice will develop individualized care plans that address the patient's specific mental health needs.
- The plan will also consider the mental health needs of family members and caregivers, offering resources, counseling, and support.
- Arc Hospice emphasizes ongoing monitoring and adjustments to the care plan throughout the patient's hospice journey.

Bereavement Services

Arc Hospice argues that its bereavement services address a critical need in the community. It acknowledges difficulty in accessing bereavement

CON Action Numbers: 10786 through 10792

services and cite resident testimonials to support this claim. Arc Hospice proposes a comprehensive bereavement program including:

- Individual counseling to address anxiety, depression, and other emotional distress.
- Family counseling to support families caring for terminally ill loved ones.
- Grief counseling to help families cope with the death of a loved one.
- Spiritual counseling provided by chaplains and through partnerships with local faith-based organizations.
- Memorial services to honor the deceased and provide closure for families.
- Follow-up care for 13 months after the patient's death.

Arc Hospice emphasizes its commitment to providing culturally sensitive care, particularly within the African American community. The applicant highlights its efforts to build partnerships with clergy and community leaders to ensure these services are readily available.

The applicant additionally mentions it offers support services for caregivers, including support groups and training programs.

Palliative Arts Program

Arc Hospice argues that its proposed palliative arts program complements existing services and enhances patient care. It describes a variety of services offered by trained professionals and volunteers, including:

- Music therapy promotes relaxation and manages pain.
- Pet therapy to reduce stress and provide companionship.
- Massage therapy promotes relaxation and manages pain.
- Storytelling to facilitate connection and meaning-making.
- Air Aromatherapy to address anxiety, depression, and sleep issues.
- Relaxation techniques to manage stress, anxiety, and pain.
- Art therapy provides emotional expression and stress relief.
- Reiki and energy healing to promote relaxation and manage pain, stress, and anxiety.
- Mindfulness and meditation promote relaxation and reduce anxiety.
- Gentle exercise and stretching to improve flexibility, manage pain, and enhance well-being.

Arc Hospice emphasizes that these services are integral to high-quality, comprehensive care. It argues that the program will improve care coordination, reduce fragmentation, and optimize resource utilization.

Arc Hospice offers a wide range of programs and services beyond core hospice care.

Patient and Family Support:

- Vigil Program
- Collaboration with Skilled Nursing/Assisted Living Facilities
- We Honor Veterans Program
- Hospice for Veterans, Homeless and Indigent
- Arc Bridge
- Medical Equipment

Culturally Sensitive Care:

- Specialized Program for the Jewish Population
- Cultural Connections and Cultural Liaison. The program includes:
 - Educational programs for staff and the community
 - A designated Cultural Liaison team
 - Culturally specific services like Spanish and Creole-speaking staff and materials
 - Development of culturally sensitive hospice care plans
 - Collaboration with community organizations and leaders
 - Investment in cultural competency training

Volunteer Program:

- Companionship and emotional support
- Respite care for family caregivers
- Life reminiscence activities
- Pet therapy
- Bereavement support
- Vigil program for end-of-life comfort
- Complementary therapies like Reiki, massage, and aromatherapy
- Veteran-to-Veteran volunteer program
- Dementia program with specially trained volunteers
- Administrative support

Community Engagement: Arc Hospice is committed to giving back to the community through a corporate volunteer program. This program will connect employees with local non-profit organizations and service projects.

Bereavement Services: Arc Hospice offers bereavement support not just to hospice families but also to the broader community.

Palliative Care: Arc Hospice offers a palliative care program that focuses on improving the quality of life for seriously ill patients and their families. (See Exhibit F for details on the program policy).

Education: Arc Hospice offers educational programs on end-of-life care for the community, health care professionals, and those involved with senior citizen programs.

Community Involvement: Arc Hospice staff participate in local boards, coalitions, and Chambers of Commerce to engage in direct dialogue with the community. This allows them to discuss current services, receive feedback, and brainstorm ideas for future programs.

Arc Hospice's proposal for expanded services has garnered significant support from the community, as evidenced by the letters submitted in Exhibit C. Here's a summary of the key points:

- **Broad Support:** Physicians, local officials, businesses, and residents all endorse the project.
- **Recognized Need:** The community acknowledges the existing and growing demand for hospice care.
- **Specific Needs Identified:** Letters highlight the lack of disease-specific programs, bereavement services, and culturally sensitive care.
- **Community Commitment:** The letters express a willingness to support the proposed services.

Bonita Springs Healthcare Services, LLC (CON application #10788) cites support for its project based on the following arguments:

- **Projected Need:** The Fixed Need Pool projection for SA 10 indicates a need for 1,245 additional hospice admissions during the period July 1, 2025 – June 30, 2026, exceeding the certificate of need threshold of 350.
- **Underserved Populations:** BSHS contends that existing hospices are not adequately meeting the needs of all demographic groups within SA 10. It points to a need for services focused on the cultural, linguistic, and religious needs of the Muslim, Hindu, Hispanic, and African American communities. BSHS emphasizes the growing Hispanic and African American populations and the specific needs of the homeless population.
- **Declining Penetration Rate:** BSHS highlights a decrease in the hospice admissions to deaths ratio (penetration rate) within SA 10 from 66.6 percent in 2019 to 65.1 percent in 2023. It suggests this decline indicates a shortage of providers or a failure of existing providers to serve all populations.
- **Educational Outreach Program:** BSHS outlines a plan to address the unmet needs through an educational outreach program targeting the underserved populations identified above. This program would involve community engagement, media outreach, and collaboration with religious and community leaders.

BSHS argues that its efforts to engage with various community stakeholders in SA 10 demonstrate a strong need for an additional hospice provider.

- **Community Support:** BSHS describes meetings with health care providers, social service organizations, religious groups, and

representatives of underserved populations. It claims the results of these meetings indicate broad support for a new hospice program, with BSHS being the ideal candidate.

- **SA Characteristics:** The applicant plans to present detailed information on various factors impacting hospice needs within SA 10. These factors include demographics, poverty rates, language spoken, and local community support. It argues that these characteristics necessitate a new hospice program with BSHS's unique perspective and capabilities.

Focus on the Muslim Community:

BSHS emphasizes the unmet needs of the Muslim community in SA 10. The applicant highlights the following points:

- **Lack of Education:** BSHS claims existing hospices are not providing adequate hospice education to the Muslim community.
- **Cultural Needs:** The applicant emphasizes the importance of cultural competency in hospice care, particularly for the growing Muslim population.
- **Community Engagement:** BSHS describes efforts to connect with Muslim leaders and community members to understand their specific needs. Dr. Omer's personal connection to the Muslim community is presented as an asset.

Data Collection Efforts:

BSHS acknowledges the lack of zip code-based data on the Muslim population and explains its use of data from the Bureau of the Census as a substitute. The applicant briefly mentions the Hindu community and its intention to address their needs as well.

BSHS argues that population growth trends in SA 10 support the need for an additional hospice provider. It makes the following points:

- **Overall Growth:** The overall population growth in SA 10 is slightly higher than the state average.
- **Disproportionate Growth in the Elderly Population:** The population over 65 is projected to increase at a faster rate than the overall population.
- **Rapid Growth in Hispanic Population:** BSHS highlights the significant projected growth of the Hispanic population, particularly in the 65+ age group. The applicant believes this population is currently underserved by hospice services.

Reasons for Potential Hispanic Underservice:

The applicant discusses historical factors that may contribute to lower hospice utilization rates among Hispanics:

- Multi-generational homes providing family support for elderly members.

- Traditionally strong family caregiving roles within Hispanic families.

BSHS argues that these traditional caregiving patterns are changing due to various social and economic factors. It anticipates a rise in hospice demand among the Hispanic population because of these changes. Additionally, the applicant points to a growing openness to hospice care within the Catholic Hispanic community.

Focus on Other Minority Populations: The applicant briefly discusses population growth trends for the Non-Hispanic White and Black populations in SA 10. It mentions plans to target outreach efforts to areas with higher concentrations of Hispanic and African American residents. BSHS acknowledges limitations in obtaining zip code-based demographic data and explains its use of broader area data from the Bureau of the Census.

Minority Patient Service: BSHS expresses a commitment to providing culturally sensitive hospice care for all minority populations, including Hispanics, African Americans, and Muslims. The applicant believes it can outperform existing providers in serving these groups.

Statistical Support: The applicant includes a statistic from calendar year 2023 showing that the percentage of Hispanic hospice patients in Florida is lower than its representation in the general population. This data is intended to support its claim of underserved minority communities.

BSHS outlines its plans to address end-stage heart disease within the underserved communities it identified:

- **African American Community:** BSHS proposes educational programs focused on hospice care as a treatment option for end-stage heart disease.
- **Homeless and Near-Homeless Population:** BSHS acknowledges the challenge of reaching this population directly. The applicant plans to partner with soup kitchens, missions, county medical clinics, and small ALFs to distribute educational brochures about hospice care (available in English and Spanish) to these groups.

Community Engagement and Outreach:

BSHS describes its efforts to understand community needs and perceptions of hospice care in SA 10.

- **Goal:** Identify unmet needs and areas for improvement in hospice services offered by existing providers.
- **Community Outreach:** BSHS conducted outreach to residents, medical professionals, and community leaders. The applicant emphasizes a commitment to serving all residents, regardless of socioeconomic status, ethnicity, or religion.

Focus on Underserved Populations:

The applicant reiterates its focus on reaching traditionally underserved communities, including:

- Muslims
- Hindus
- African Americans
- Hispanics
- Homeless and near-homeless individuals
- Low-income residents
- Residents of small, assisted living facilities (ALFs)
- Geographically isolated residents in remote areas

Financial Commitment: BSHS pledges to allocate \$100,000 to develop an outreach program specifically targeting these underserved populations.

Market Assessment: BSHS aligns its findings with the Agency's determination of a need for additional hospice providers in SA 10. It believes its presence will not negatively impact existing providers, but rather allow all providers to meet the projected increase in demand.

Strengths and Impact:

The applicant expresses confidence that its strengths as a hospice provider, combined with its commitment to serving a broad demographic, will increase overall hospice utilization in SA 10, particularly among underserved populations.

BSHS acknowledges that the rule only requires one office location in Broward County (SA 10). However, it expresses a willingness to open additional offices based on community needs.

- **Focus on Underserved Populations:** BSHS suggests it may locate offices in areas with high concentrations of Muslims (near Islamic Centers or Mosques), Hispanics (south end of the county), and African Americans (Ft. Lauderdale area).

Importance of Staff Location: The applicant emphasizes that most of the hospice care is delivered in patients' homes. Therefore, the home addresses of BSHS staff are more relevant than the office location.

Advantages of a Single Provider: BSHS criticizes the current fragmented system of hospice care in SA 10, where multiple providers compete for patients and revenue. The applicant presents its one-stop-shop model as a solution, allowing patients to seamlessly transition between different care services based on their needs.

Continuum of Care Wheel: The applicant includes a reference to a "Continuum of Care Patient Wheel" which illustrates the various services included in its proposed model.

Comparison with Competitors: BSHS anticipates that other applicants may discuss potential partnerships with other care providers. It emphasizes its commitment to developing a fully integrated continuum of care within two years of licensure, encompassing all the services mentioned above (hospice residential facility, home care, home health, palliative care, DME, transportation, and hospice care).

Competitive Advantage: BSHS highlights its comprehensive care model as a key advantage over competitors. The applicant believes a single provider offering a range of services can better match patient needs, reduce anxiety, and eliminate confusion often associated with transitioning between multiple providers.

Summary:

- **Alignment with AHCA Need:** BSHS aligns its application with the AHCA's published need for an additional hospice program in SA 10.
- **Serving Underserved Communities:** BSHS emphasizes its commitment to serving all residents of SA 10, particularly those who have been traditionally underserved, including Muslims, Hindus, Hispanics, African Americans, the homeless, and low-income residents.
- **Culturally Sensitive Care:** BSHS highlights its efforts to understand and address the specific cultural and religious needs of the Hispanic community.
- **Continuum of Care:** BSHS proposes a comprehensive care model encompassing various services under one roof, aiming to improve efficiency and reduce stress for patients and families.
- **Focus on In-Home Care:** BSHS prioritizes providing in-home care whenever possible, based on individual patient needs.
- **Commitment to All Patients:** BSHS assures it will not discriminate in patient selection based on acuity level or reimbursement potential.
- **Sustainable Growth:** BSHS believes the projected growth in hospice admissions can accommodate a new provider like themselves without impacting existing businesses.

Overall, BSHS portrays itself as a patient-centered provider offering a holistic and accessible approach to hospice care in Broward County.

Bristol Hospice – South Florida, LLC (CON application #10789) cites data substantiate the need for [its](#) proposed hospice program in Broward County.

- **FNP:** The Agency’s statewide hospice utilization rates to project hospice admissions - This projection (12,427 admissions) exceeds the current SA capacity (11,182 admissions) by 1,245 admissions during the July 2025 to June 2026 planning period. Additionally, there haven't been any new hospice agencies approved in Broward County in the past two years. Both factors surpass the AHCA's benchmark for additional hospice need (net need exceeding 350 admissions).
- **Broward County's Demographics:** Broward County's growing elderly population will further increase the demand for hospice services and potentially change the types of services needed.
- **Addressing Additional Needs:** Bristol has identified specific needs within the community that its program aims to address. A comprehensive community needs assessment (detailed elsewhere in the application) explores these gaps in greater detail. Here's a summary of those needs:
 - Growing elderly population
 - Facility-based patients requiring hospice care
 - Patients with specific needs (Alzheimer's, Parkinson's, other neurological diseases, cancer, stroke)
 - Racial and ethnic minorities with lower hospice utilization rates
 - Low-income residents with lower hospice utilization rates
 - Large veteran population

Broward County's demographics make it clear: a rapidly growing population with a significant shift towards an older age bracket. This section of the application by Bristol explores how these trends translate into a growing need for hospice care.

Broward County Profile: Located in southeast Florida, Broward County boasts a population exceeding 1.9 million, making it the state's second-most populous county. The county is predominantly urban, with Ft. Lauderdale as its largest city. With a population density exceeding 1,600 residents per square mile, Broward County is a bustling hub.

Shifting Age Demographics: While the overall population growth rate is projected to slow down in the coming decade, the most significant increase is expected among residents aged 75 to 84. This will cause a substantial change in the county's age distribution, with the proportion of residents over 65 rising from 17 percent to 24 percent by 2035. Notably, the age distribution within the over-65 group will also evolve, with a growing number of people reaching the oldest age brackets.

Impact on Hospice Needs: This surge in elderly residents, particularly those over 85, will significantly increase the demand for hospice services in Broward County. National data demonstrates a clear correlation between age and hospice use rates. By 2035, projections indicate that over half of all hospice patients in Broward County will be over 85 years old. Considering this demographic shift, hospice services designed for elderly individuals, especially those over 75, are crucial. Specialized care for conditions like dementia and mobility issues will be in high demand.

Focus on Facility-Based Care: Many elderly hospice patients, particularly those over 85, reside in skilled nursing facilities. These patients often face challenges accessing hospice care due to factors like limited family support and physical or cognitive limitations. Recognizing this critical service gap, Bristol emphasizes its commitment to providing hospice care within these facilities.

Bristol's Tailored Approach: The applicant will offer targeted services and programs specifically designed for the elderly population. This includes specialized care for common conditions among this age group. Additionally, Bristol will focus on building strong palliative care programs to bridge existing gaps in service delivery.

Broward County's growing elderly population, especially those residing in skilled nursing facilities, faces challenges in accessing hospice care. Bristol acknowledges this gap and outlines its plan to address it, as evidenced by the enthusiastic support from community partners.

- **Community Outreach and Strong Support:** Bristol has already initiated outreach to skilled nursing facilities, and administrators have expressed strong support for Bristol's program, particularly its unique services. Letters of support (detailed in Exhibit 2) highlight the value of:
 - **Timely Response:** "Their commitment to responding within an hour to referral calls and admitting clients within four hours demonstrates a dedication to timely and efficient care, greatly benefiting our patients and residents," says Barbara Yanez Artilles, Administrator at Ft. Lauderdale Health & Rehab.
 - **Innovative Programs:** Grant Belkin Munoz, Director of Nursing at Glades West Rehabilitation and Nursing Center, emphasizes, "With their wealth of experience and resources, Bristol Hospice is well-positioned to introduce innovative programs and services tailored to the unique needs of Broward County residents."

CON Action Numbers: 10786 through 10792

- **Specialized Care:** Paula Calixte, Director of Nursing at NSpire Healthcare - Tamarac, highlights programs crucial to the community: "...the specialized dementia and nighttime programs provided by Bristol Hospice are crucial additions to our community. Its expertise in these areas surpasses current offerings, enhancing the quality of care available to our residents."
- **Serving All Settings:** Bristol's commitment extends to various residential settings, ensuring no patient is left behind:
 - Skilled nursing facilities
 - Assisted living facilities
 - Adult family care homes
 - In-home care (with a focus on allowing patients to remain at home for as long as possible)
- **High-Quality Care for Elderly Patients:** Bristol has pledged specific actions to ensure top-tier care for elderly patients in all settings:
 - Increased staffing levels of nurses and hospice aides (to ensure high intensity of care)
 - Funding for patient and family transportation, particularly in underserved rural areas
 - "Sweet Dreams" program to improve patient outcomes
 - Palliative care through Bristol's Advanced Illness Management Program (AIM)
 - Virtual Reality program (details not provided in this excerpt)

These commitments demonstrate Bristol's understanding of the community's needs and its dedication to providing high-quality hospice care across various settings. By addressing the specific challenges faced by facility-based patients and offering innovative programs, Bristol aims to fill the gaps in Broward County's hospice care system.

Current Patient Population:

- **Leading Diagnoses:** Analysis of hospice admissions and Broward resident deaths (Tables 8 & 9) indicates that Cancer, Circulatory/Heart Diseases, and Alzheimer's, Parkinson's & Other Nervous System Diseases will make up most of Bristol's patients.
- **Length of Stay:** Disparities exist in hospice utilization by diagnosis (Table 12). Cancer patients have the shortest stays, while Neurological conditions like Alzheimer's require significantly longer stays.

Future Considerations:

- **Ageing Population:** Broward County's aging population will lead to a larger share of hospice patients in the oldest age groups.

CON Action Numbers: 10786 through 10792

- **Neurological Conditions:** Diseases like Alzheimer's are expected to become increasingly important for hospice providers due to its rising prevalence among the elderly. Bristol anticipates a 4.4 percent increase in hospice patients with Alzheimer's diagnoses between 2025 and 2035.

Bristol's Commitment to Quality Care:

- **Specialized Programs:** Bristol offers dedicated programs for Cancer Care, Stroke/CVA, and Neurological conditions like Alzheimer's (Bright Moments program).
- **Staff Training:** Bristol invests in specialized training for nurses, social workers, and other staff to ensure expertise in caring for patients with these conditions.
- **Partnerships:** Bristol collaborates with Purple Flag, a program promoting quality dementia care, to further enhance staff education and patient well-being.

By addressing these disease-specific needs and planning for future trends, Bristol demonstrates its commitment to providing comprehensive hospice care for Broward County's growing elderly population.

Building on its focus on patient needs, Bristol has garnered strong support from Broward County physicians, as evidenced by the positive remarks in letters of support (detailed in Exhibit 2). These endorsements not only strengthen Bristol's application but also shed light on potential shortcomings in current hospice care options.

- **Dissatisfaction with the Status Quo:** Several physicians express concerns about the quality of existing services. Dr. Jeffrey P. Wallace, a hospice Medical Director, mentions witnessing a decline in areas like:
 - "...the quality and quantity of bedside services provided to both patients and family members"
 - "...providers accepting fewer patients with more complex medical conditions"
 - "...the inconsistent provision of higher levels of hospice care, especially continuous care services in the home"
- **Alignment with Physician Needs:** Physicians specifically praise Bristol for its commitment to addressing these very concerns. Dr. Francis E. Salazar, M.P.H., highlights Bristol's focus on:
 - "...increased visits by nurses and Certified Nursing Assistants (CNAs)"
 - "...the delivery of elevated levels of care when necessary"
 - "...the implementation of their specialized programs designed to cater to the needs of both patients and family members, irrespective of their financial circumstances"

- **Enhancing Hospice Care in Broward County:** Physicians express confidence that Bristol will significantly improve the hospice landscape. Dr. Corinne Gerhart, a Hospice and Palliative Care Physician, applauds Bristol's dedication to:
 - "...delivering personalized and dignified care"
 - "...innovative service delivery methods and expanded service offerings"
 - "...addressing the crucial need for comfort and support in our community"

These endorsements from medical professionals strengthen Bristol's application by demonstrating a clear need for improved hospice care and highlighting how Bristol's program is designed to fill those gaps. By addressing the concerns raised by physicians and offering a more comprehensive approach, Bristol positions itself as a valuable addition to Broward County's hospice care network.

The applicant analyzes how social determinants of health affect access to hospice care in Broward County, Florida, revealing racial and ethnic disparities in hospice utilization among Medicare beneficiaries.

- **Broward's Diverse Landscape:** Broward County boasts a much more diverse population than Florida as a whole. Black (30.6 percent), Hispanic (32.5 percent), and Asian (4.0 percent) residents make up a larger share of the population compared to the state's average. These demographics are not evenly distributed geographically. Hispanic residents tend to be more spread out, while Black residents are concentrated in Eastern Fort Lauderdale and Lauderhill East.
- **Social Determinants and Racial Disparities:** A 2019 Community Health Needs Survey uncovered significant disparities in social determinants of health between Broward's racial and ethnic groups. Black and Hispanic communities experience higher rates of financial fragility, unhealthy housing conditions, food insecurity, obesity, lower educational attainment, and limited health care access. These factors contribute to higher poverty rates among Black (19.8 percent) and Hispanic (12.6 percent) residents compared to Whites (9.8 percent).
- **Unequal Access to Hospice Care:** Analysis of Medicare beneficiary deaths in 2022 reveals a troubling trend. White beneficiaries not dually eligible for Medicaid and Medicare had the highest hospice utilization rate (60 percent). Black, Asian/Pacific Islander and Hispanic beneficiaries had significantly lower hospice use rates (44.1 percent, 45.9 percent, and 54.6 percent respectively). Even among low-income, dual-eligible beneficiaries, hospice use was slightly higher for Whites.

- **Other Issues:** Limited financial resources, transportation issues, and lower health care access may all contribute to lower hospice use among minorities. Additionally, cultural competency issues and lack of awareness about hospice options in certain communities could be significant barriers.

These findings suggest that a substantial number of minority residents in Broward County who qualify for hospice care are not receiving it.

Bristol's multi-pronged approach to reach these underserved communities:

- **Leveraging Existing Relationships:** Partnering with skilled nursing facilities, assisted living facilities, and senior care providers throughout Broward County to broaden outreach.
- **Community Engagement:** Collaborating with community organizations and representatives to raise awareness of hospice services. As stated by Pastor Anthony Manuel of St. Ruth Church, "increased level of hospice services can bless the lives of the good people of our community."
- **Dedicated Staff:** Hiring a Hospice Community Liaison to coordinate outreach efforts and develop culturally competent care programs for minorities and low-income residents. The Liaison will also target referrals from patients already receiving home health services, personal care services, or family care support. The applicant will address potential barriers faced by traditional referral sources in promoting hospice to underserved populations.
- **Mobile Outreach Unit:** A dedicated unit staffed by bilingual professionals (nurse and social worker) will provide education and information on hospice and palliative care options, along with facilitating early identification of hospice-eligible patients and supporting caregivers. The unit will focus on low-income and ethnically diverse populations.

Addressing Financial Barriers:

- Provide free or discounted care to indigent patients without financial resources.
- Offer transportation assistance (up to \$25,000 annually) for patients and families, particularly in rural areas with limited public transportation.

Additional Efforts in Broward County:

- Establishing a physical presence in Ft. Lauderdale to better serve underserved communities.
- Utilizing virtual reality technology to provide culturally-specific patient experiences.

Letters of Support: Letters from various community providers are included in Exhibit 2 to demonstrate support for Bristol's project and its focus on underserved populations. Catherine Wallace, MS, Regional Director of Florida Death with Dignity, writes, "Bristol Hospice, with its extensive expertise and abundant resources, stands poised as the ideal organization to offer compassionate end-of-life care to those who need it most."

Broward County's Veteran Population: Broward County houses a substantial veteran population, ranking third-highest among Florida counties. With over 80,000 veterans, approximately 37,000 are aged 65 or older. While a slight decline is expected over the next decade (as shown in Table 16), veterans will remain a significant demographic. In recognition of veterans' unique needs, Bristol will establish a specialized hospice program. This program includes:

- Honors ceremonies
- Life review projects
- Special events
- Veteran volunteers who visit patients to provide companionship

Bristol acknowledges the importance of integrating a patient's military history and preferences into their individualized care plan. Additionally, the organization offers ongoing education for staff and volunteers to ensure veteran-centric care.

We Honor Veterans Partnership: Bristol aims to achieve Level 4 Partnership Certification within the We Honor Veterans program within two years of licensure. A brochure detailing this program is included in Exhibit 12.

Broward County Veteran Initiatives:

- Veteran Specific Programming (Condition 7)
- Virtual Reality Program (Condition 17)

Charis Healthcare Holdings, LLC (CON application #10790), a provider of home health and nursing services in Florida, proposes establishing a new hospice program in SA 10. Its application highlights the growing need for hospice care in the area and its qualifications to meet that need.

Community Need:

- Broward County's projected death rate is expected to reach 18,694 for the year starting July 2025.
- AHCA's planning horizon identified a need for additional hospice services in the area.

Charis' Qualifications:

- Experienced team with established relationships with community members, health care providers, and existing facilities.
- Ability to leverage existing infrastructure (office space, staff, equipment) from its home health and nurse registry operations in Broward County, resulting in reduced project costs of \$293,474.28.
- Commitment to providing client-centered hospice services aligned with state and local health plans, with support from the local community (evidenced by attached letters of support).

Charis includes the following quote, "Haven Home Health has been a beacon of compassion, providing comprehensive health care services tailored to meet the unique needs of each patient. Their team of skilled professionals goes above and beyond to ensure that individuals receive the highest standard of care in the comfort of their own homes."

The applicant, Charis, is a multi-state provider of Medicare-certified hospice and home health care services. It operates under the d/b/a "Haven Home Health Care" and currently have 33 locations across nine states.

Charis acknowledges the presence of another hospice provider named "Haven Hospice" in Florida and assures the reviewer that it will establish a clear distinction in branding if awarded the certificate of need.

Strategic Focus:

- Medicare hospice and home health services
- Commercial insurance and private duty home health services for seniors
- Collaboration with relevant health care providers in the SA (S.A.)

Strengths as a Hospice Provider for SA 10:

- Existing presence in the community
- Established relationships with other providers, health care professionals, local officials, and community members
- Commitment to compassionate and dignified care

Charis cites a quote from Danielle Davault, RN, which emphasizes its reputation for quality care as a reason for patient preference.

The applicant highlights several factors contributing to the growing demand for its services:

- Increasing elderly population
- Higher costs associated with acute care settings
- Advancements in technology enabling quality care at home

CON Action Numbers: 10786 through 10792

Mission Statement: Charis offers home and facility-based services to clients, aiming for its highest rehabilitation potential and overall well-being. The applicant delivers high-quality, multidisciplinary care by professionals who conduct comprehensive assessments from both the client's and professional's perspectives.

Hospice Mission: The Charis hospice program provides compassionate care to patients with life-limiting illnesses and their loved ones.

Vision Statement: Charis envisions a community where everyone receives compassionate care while facing serious illnesses, end-of-life situations, or the loss of loved ones.

Values:

- **Compassion, Care, Respect, and Courtesy:** Charis prioritizes treating everyone with these values.
- **Comfort, Dignity, and Safety:** It values ensuring these for their patients, families, and caregivers.
- **Integrity, Honesty, and Ethical Behavior:** These are core values guiding its conduct.
- **Teamwork, Open Communication, and Mutual Respect:** Collaboration and respect are central to its operations.
- **Community Involvement:** The applicant values being an active part of the community.

Philosophy: Charis' philosophy emphasizes commitment to patients, leadership, and excellence.

- **Focus on Individual Needs:** The applicant recognizes the unique physical, emotional, and spiritual needs of each person.
- **High Standards of Care:** It strives to deliver the highest level of service to all stakeholders.
- **Clinical Excellence:** Charis prioritizes state-of-the-art hospice services and fosters excellence through education programs.
- **Teamwork and Performance Improvement:** Charis cultivates a teamwork environment where continuous improvement is valued.
- **Human Resources:** Charis recognizes the importance of its personnel, physicians, and volunteers for success.
- **Supportive Physician Environment:** It provides physicians with an environment conducive to high-quality care.
- **Financial Sustainability:** Charis maintains financial viability through cost-effective operations, ensuring its long-term commitment to the community.

Charis is guided by a tradition of personal, clinical, and technological excellence. It prioritizes serving patients in the community setting while delivering compassionate and respectful care.

Exhibit A contains biographies of the executive leadership team overseeing the project.

A quote from Mark E. Doyle, CEO of Holy Cross Hospital, is included, expressing strong support for Charis' application. Mr. Doyle highlights its patient advocacy, community roots, and commitment to supporting community members.

Need for Additional Hospice Services: Charis proposes establishing a new hospice service in SA 10, citing a projected need identified by AHCA. In February 2024, AHCA published its July 2025 Need Projections for Hospice Programs, indicating a net need for hospice services in SA 10.

SA 10 Demographics: While AHCA's projections are a helpful tool, Charis acknowledges the importance of understanding specific reasons for the need. The applicant points out that, according to AHCA's data, approximately 20 percent of projected deaths in SA 10 will be from cancer, compared to the statewide projection of 31.82 percent. This suggests a higher prevalence of non-cancer-related chronic diseases in SA 10.

Addressing Specific Needs in SA 10:

- **Cancer:** Charis plans to offer a "Cancer Information and Care" program to provide training, education, and resources for staff, health care professionals, caregivers, and patients.
- **Cardiovascular Disease:** Charis will implement a "Cardiovascular Care" training program for staff, health care professionals, and community members, focusing on high-acuity cardiac services.

Charis argues that it will meet community needs by:

- Offering additional choices for hospice care providers
- Providing education about hospice services, particularly for low-income and minority residents
- Facilitating a smoother transition from home health to hospice care for qualified patients
- Offering specialized care for prevalent chronic diseases in the area
- Supporting an "aging in place" approach, allowing clients to remain at home with dignity and comfort

Established Healthcare Provider: Charis is a national health care provider headquartered in Boca Raton, Florida, with over 700 employees and 30 offices nationwide. It offers a comprehensive range of services, including hospice, home health, and private duty nursing.

Existing Hospice and Home Health Operations: Charis currently operates hospice programs in Arizona and Indiana, as well as Medicare-

CON Action Numbers: 10786 through 10792

certified home health agencies in Arizona and Washington. In Florida, the applicant has a home health agency in Broward County (SA 10) and neighboring areas.

Reduced Startup Costs: By leveraging existing office space, administrative staff, and equipment across its Florida operations, Charis anticipates minimizing startup and operational expenses for the proposed hospice program in SA 10.

Market Expertise: Charis emphasizes its experience operating hospice and home health programs in multiple states, demonstrating its understanding of the market and its ability to strengthen it.

Established Presence in SA 10: Charis already provides home health services throughout SA 10 with a district office in Broward County. It also operates a home health agency and private duty nursing registry in nearby Boca Raton. These existing operations are expected to facilitate the smooth implementation of hospice services in SA 10.

Community Relationships: Charis highlights its established relationships with local health and human service organizations throughout Florida. The applicant believes its reputation and these relationships will aid in staffing, referrals, and collaboration within SA 10.

Volunteer Recruitment Strategy: In addition to offering competitive compensation and benefits, Charis plans to actively engage the volunteer community to address potential workforce challenges.

Applicant Testimonial: A quote is included from Danielle Davault, RN, Regional Director of Nursing at Haven Home Health (presumably affiliated with Charis). Ms. Davault emphasizes the positive impact of quality care on patients and families.

Community Involvement and Understanding Needs: Charis emphasizes that volunteer participation will help them understand the health care concerns of the district and raise awareness of hospice care. It plans to engage with local health care providers, community members, and leaders to identify and address underserved areas within the terminally ill population.

Experience in Hospice Operations: Charis highlights its experience operating hospice programs in six locations across Arizona and Indiana.

Employee Education: Charis provides a comprehensive education program for all employees, covering essential topics such as cultural

CON Action Numbers: 10786 through 10792

sensitivity, ethics, pain management, and end-of-life care. Additionally, Charis offers various educational programs for staff, health care partners, caregivers, and clients, focusing on hospice care, grief management, and patient well-being.

Physician Oversight and Home Visits: A hospice medical director will oversee the medical component of the program, providing oversight of physician services, ensuring continuity of care, and managing patient symptoms. A hospice team physician will be available to cover for the medical director when needed. Charis will have a written service agreement with a qualified physician to provide medical direction and consultation.

Continuous Care Services: Charis will provide continuous care services for patients on Medicare, Medicaid, or other qualifying insurance plans. This service provides at least eight hours per day of nursing care to manage symptoms and maintain patients in their homes.

Pharmacy Services: Charis will have contracts with pharmacies to ensure 24/7 access to medications, including controlled substances, for pain and symptom management.

Rehabilitative Services: Qualified rehabilitation professionals will develop and implement personalized rehabilitation plans to promote patient safety, symptom management, and optimal functioning.

Speech Therapy Services: Speech therapy services will be provided by or under the supervision of a speech therapist to address any communication difficulties experienced by patients.

Nutritional Services: Charis will provide nutritional assessments, interventions, and counseling to address the nutritional needs of patients and offer support to families and caregivers. A registered dietician will be available for consultations and training.

Chaplaincy: Charis will provide spiritual care counseling that respects the patient's/family's/caregiver's beliefs. A hospice chaplain will be assigned to each patient based on their needs and will participate in developing and implementing the plan of care.

Psychosocial Services: Charis will provide psychosocial services by qualified social workers to address emotional factors related to terminal illness, offer counseling to patients and families, and support the hospice team.

Bereavement Services: Charis will offer a bereavement program for up to one year following the death of a patient. The program will provide

CON Action Numbers: 10786 through 10792

support to families and caregivers, help them navigate the grieving process, and connect them with additional community resources if needed.

Nursing Care: Nursing services will be provided by or under the supervision of registered nurses. A hospice nurse will be assigned as the case manager for each patient and family, coordinating care and ensuring that the plan of care is implemented effectively.

Volunteer Services: Charis will have a volunteer program with trained volunteers who can provide companionship, emotional support, practical assistance, bereavement support, errands and transportation assistance, and office help. Volunteers will also report on patient and family responses to its services.

We Honor Veterans Program: Charis is committed to providing specialized care for veterans at the end-of-life. It will implement the We Honor Veterans program and partner with the Veterans Administration and local veterans' organizations to understand and address the unique needs of veterans. (Refer to Schedule C)

Hospice Community Education: Charis plans to offer community education programs to raise awareness of hospice services and end-of-life care options.

Medical Equipment and Supplies: Equipment and supplies will be obtained through designated vendors with contracts with Charis.

Transportation Services: Charis will arrange non-emergency medical transportation when medically necessary for admissions, re-evaluations, or respite care.

Support for Nursing Programs: Charis commits to offering \$35,000 to a local nursing program to develop a hospice and palliative care training course. The applicant will also offer rotational positions in the hospice program to nursing students. (Refer to Schedule C)

District Office: Charis will establish a central district office within 120 days of approval. (Not specifically addressed in Schedule C)

Market Competition: Charis believes its experience and high-quality care will allow them to compete effectively with existing hospice providers in SA 10, leading to greater access to care and potentially lower costs.

Hope Florida: Charis expresses a commitment to the community and plans to partner with the Department of Children and Families' Hope

Florida Initiative. This includes a \$25,000 donation, sponsorship of local events, employee volunteerism, and connecting Hope Florida recipients with potential employment opportunities. (Refer to Schedule C)

Diverse Population Needs

Charis recognizes the service area's diverse population with growing minority communities. It believes expanded hospice services will benefit:

- Underserved terminally ill patients
- Indigent, food insecure, homeless, veterans, and LGBTQ communities
- Patients with various diagnoses (heart disease, cancer, diabetes, dementia)
- All age groups (over and under 65)
- Patients in assisted living facilities or nursing homes
- Individuals with limited education, uninformed about hospice, or facing health care barriers

The applicant cites the following - “why Charis is best suited” to serve SA 10:

Established Expertise: Experienced provider with resources, emphasizing holistic care. Existing familiarity with the region allows them to focus on engaging and educating underserved communities.

- **Disease-Tailored Programs:** Specialized programs for patients with specific conditions like heart disease, cancer, diabetes, and dementia.
- **Commitment to Quality Care:** Compassionate professionals including hospice physicians, nurses, social workers, chaplains, volunteers, and more. 24/7 care and services.
- **Accessibility:** Initial assessment within 48 hours of hospice election. Charity Care program for qualifying indigent patients.
- **Community Focus:** Emphasis on local recruitment, education efforts, and collaboration with community leaders, clergy, and officials.

Moments Hospice of Broward, LLC (CON application #10791)

highlights a significant gap in hospice services identified by the FNP in February 2024. Moments Broward emphasizes its qualifications to address this need. The applicant cites its experience from operating hospices in six other states, including a program in neighboring Miami-Dade County.

The strength of Moments Broward's application hinges on the extensive community support it has garnered. This includes endorsements from all major hospital systems in Broward County, along with supportive letters

from major Miami-Dade institutions that refer patients to Broward County.

Notably, 30 out of 32 Broward County nursing homes (representing 97 percent of licensed beds) have expressed support. Additionally, Moments Broward has secured endorsements from various assisted living facilities, veteran organizations, health care providers, faith-based organizations, and other community groups. This broad spectrum of support suggests Moments Broward's potential to effectively integrate into the existing health care landscape and serve diverse patient populations within SA 10.

Moments Broward's intention is to achieve accreditation from the Commission on Accreditation for Home Care & Hospice (CHAP) within 60 days of receiving its license. This aligns with its company-wide commitment to CHAP accreditation for all its hospice locations.

Moments Background and Philosophy: Moments Hospice was founded by Sol Miller and Eli Jaffa, driven by their dissatisfaction with the quality of hospice care available in Minnesota. Witnessing slow response times and inadequate care in existing programs. The applicant envisioned a patient-centered approach that prioritized well-being regardless of complexity or cost. This philosophy has resulted in a stellar reputation for Moments, with families and facilities trusting them to deliver exceptional care.

Moments Hospice operates with a lean and agile structure, where senior leaders support clinical staff and ensure quality care. What sets them apart is their unwavering commitment to prioritizing patient needs, even in complex or high-cost situations, making them more willing to take on patients others may hesitate to serve.

Moments' vision statement underscores its core values:

- **Patient-Centered Care:** The focus is on ensuring comfort and dignity throughout the end-of-life journey, from admission to bereavement support.
- **Expertise and Integrity:** The applicant combines clinical excellence with ethical conduct in serving patients, families, and referral partners.
- **Open Access:** It ensures eligible patients with complex or individualized needs have access to hospice care.
- **Empowerment Through Education:** The applicant believes in educating patients and families about hospice benefits to promote informed decision-making.

- **Investment in Resources:** It prioritizes investment in technology and resources to create an effective work environment that fosters exceptional care delivery.
- **Continuous Improvement:** The applicant embraces a growth mindset, utilizing missed opportunities to learn and improve its processes.

In 2018, Moments recognized the need to go beyond *its* mission, vision, and values to capture the essence of *its* unique patient care philosophy. This led to the development of "The Moments Way," a comprehensive approach that guides every staff member's interaction with patients, families, and care teams.

The Moments Way emphasizes:

- Delivering the highest quality care possible, with a focus on staff pride in their work.
- Combining clinical expertise with integrity to ensure a patient-centered approach.
- Instilling this philosophy in all staff through mandatory training and ongoing reinforcement.

Integration into Company Culture:

- **Mandatory Online Training:** Every new employee undergoes a one-hour interactive training session delivered live by executive leadership. This training delves into the history of The Moments Way, its importance within the company culture, and how staff should embody it in their daily interactions with patients, colleagues, and the community.
- **Daily Decision-Making and Direction:** The Moments Way informs staff decision-making at all levels, guiding the company's direction as well.
- **Public Celebration:** Moments proudly showcases The Moments Way on its website and in brochures for patients and families considering hospice care.

Moments Programs Addressing Diverse Needs:

- **CHIRP Program (Cardiopulmonary Hospital Intervention & Readmission Program):** This program focuses on patients with heart failure and COPD, utilizing rapid response protocols to address symptoms associated with these conditions.
- **MIND Program (Memories, Inclusion, Namaste, Dignity):** Designed for dementia patients, this program addresses some of the most neglected areas of need – preserving memories, fostering inclusion, providing respectful Namaste care, and upholding patient dignity.

- **Tender Moments Program:** This program offers companionship care for all patients, providing options such as afternoon companionship visits, spa visits, or additional bedtime tuck-ins.

Moments' unique programs:

- **Virtual Reality:** Immersive experiences like revisiting cherished places or participating in calming activities.
- **Death Doula Program:** Trained volunteers provide companionship, emotional support, and guidance throughout the end-of-life journey.
- **Non-Pharmacological Interventions:** Reiki, music therapy, massage, and pet therapy offer comfort and symptom relief.
- **Power of Feeling Heard:** Training ensures staff truly listen to and understand patients' and families' needs.
- **Namaste Care:** Promotes a sense of peace, dignity, and connection for all patients through sensory interventions and slow, intentional care.

Moments Hospice stands out for its strong community support and commitment to serving underserved populations.

- **Unmatched Support:** Moments Broward boasts an impressive 187 letters of support, exceeding all other applicants. This includes endorsements from all hospital systems, 97 percent of nursing homes, numerous assisted living facilities, physicians, clinics, veteran organizations, and faith-based groups.
- **Proven Success:** Moments bring valuable experience from its successful launch in neighboring Miami-Dade County.
 - While initial admissions were lower than expected, this can be attributed to the unusual circumstance of two hospices being licensed simultaneously.
- **Focus on Underserved Groups:** Moments identifies specific underserved populations like cardiac patients, Alzheimer's patients, and minorities, and have developed targeted plans to address the unique needs of these groups.
- **Addressing Unmet Needs:** Moments Broward highlights several unmet needs in Broward County's hospice care, including the lack of open access programs and limited services for specific patient groups. Detailed plans outlining how it plans to bridge these gaps are presented in the Fixed Need Pool section (page 25).

The Moments Hospice Foundation: Was established due to the heartfelt desire of patients' families to show gratitude for Moments' caregiving staff. The foundation focuses on fulfilling end-of-life wishes, creating lasting memories for patients and families, whether it's a wedding, lifelong dream, or simple pleasure like reuniting with a lost guitar or lake ride.

Mission and Vision: "Enrich the experience for patients and veterans to create lasting end-of-life memories." Its vision: "A place where every individual has an end-of-life experience filled with dignity, support, and hope."

Moments states it understands the financial burdens associated with end-of-life care and when needed, will provide support for bills, groceries, or travel expenses for families visiting loved ones. The applicant cites its participation in the We Honor Veterans Program stating it recognizes the unique needs of veterans and their families. Aims to provide a peaceful and dignified end-of-life experience for veterans. Appreciates veterans' sacrifices and fosters a sense of camaraderie. Offers events and ceremonies that connect veterans and share their experiences.

Hospice education is addressed with Moments citing it believes education is crucial to increasing access to hospice care. It will provide training for health care professionals by industry experts. Hosting events like lunch-and-learns and virtual meetings to raise awareness. Empowers providers to identify patients who might benefit from hospice.

Strong Leadership:

- Eli Jaffa, co-founder of Moments Hospice, leads the foundation.
- Rabbi Menachem Feller who oversees educational and social programs.
- Benjamin Herman's expertise in Jewish community needs.

Moments Hospice proposes a range of conditions, including:

- Initiate licensure application within 30 days of receiving the CON.
- Notify CHAP of its accreditation survey within 30 days of state licensure.
- Respond to referrals within 1 hour and begin admission within 2 hours (upon receiving physician orders and patient/family readiness).
- Implement 24/7 triage with video capability staffed by Moments employees.
- Ensure RN availability 24/7/365 for admissions and symptom management.
- Provide an average of five CNA visits per week, with flexibility based on patient needs and IDG approval.
- Offer an average of two nursing visits per week, with adjustments based on IDG approval and patient needs.
- Launch an Enterprise Car Lease Program to address clinician transportation challenges and enhance IDG team diversity.
- Participate in at least two volunteer/job fairs annually for the first two years to attract qualified staff.

CON Action Numbers: 10786 through 10792

- Establish clear communication protocols with patients and families at admission.
- Develop individualized care plans in collaboration with patients, families, physicians, and caregivers, reflecting the "Moments Hospice Way" philosophy.
- Include all nursing home or care facility residents in the Initial Moments Program.
- Moments Broward will submit signed declarations to AHCA in its annual conditions compliance reports to demonstrate adherence to these conditions.
- Implement the We Honor Veterans program and achieve Level 4 Star certification within two years.
- Recruit veteran volunteers for peer support.
- Hire a Veteran Liaison to connect with veteran organizations.
- Organize 250 veteran pinning ceremonies annually for two years.
- Create Veteran Honor Walls in health care facilities to honor veterans.
- Sponsor applications for additional homecare services (VeteranCare) for two veterans per year for two years.
- Sponsor Honor Flights for two veterans per year for three years.
- Offer annual Advance Care Planning sessions to veteran groups.
- Moments Open Access Program will accept patients regardless of code status (Full Code).
- Moments will serve medically complex patients receiving high-acuity services like TPN and IV fluids. Provide 24/7/365 admissions with on-call staff.
- Integrate palliative care for pain management, symptom control, and education.
- Join the National Institute for Jewish Hospice within the first year.
- Offer a Bridge Program allowing temporary continuation of certain treatments while transitioning to standard hospice.

Specialty programs within the first year include:

- **Cardiac & Pulmonary:** Includes CHIRP (hospital readmission reduction), AHA Palliative/Hospice Heart Failure certification (year 2), respiratory therapist, and consultant pharmacists.
- **Dementia:** M.I.N.D. program with palliative care items and Namaste Care for a calming environment.
- **Cancer:** Triad Program for complex pain management.
- **Falls:** StepPrep fall prevention program.
- **ALS & Neurological:** Synapse Program for specific needs.
- **Wound & Sepsis:** Dedicated programs for wound management and sepsis care.
- **Renal:** Program for End Stage Renal Disease.

CON Action Numbers: 10786 through 10792

These programs aim to enhance the hospice experience for a diverse patient population in Broward County.

Moments Hospice cites its Final Moments Programs including Muse Health care Analytics (or similar) to identify patients and provision of Death Doula support, Vigil Visits: Trained staff, volunteers, and death doulas offer comforting presence during final days. Moments will recruit volunteers specifically for vigil visits. Moments Tender Moments Program providing Companionship care for all diagnoses.

Moments will implement education programs within the first year, contingent on being appropriate for the patient's care plan. Compliance will be documented through reports.

- **Staff Education:** All staff will be trained on Moments programs upon hire and ongoing.
- **Nurse Preceptor:** A dedicated nurse will manage and train team members.
- **Community Education:** Moments will offer educational programs to the community on program-related topics four times a year for the first two years.
- **Education Trailer:** Moments will utilize its mobile education trailer in Broward County for outreach and education.

Moments acknowledges the diverse population in Broward County and aims to reduce cultural barriers to care – citing its proposes

- **Bilingual Staff & Volunteers:** Hiring and retaining bilingual staff and volunteers to serve Hispanic, Black, and Jewish communities.
- **LGBTQ+ Sensitivity:** Obtaining SAGE Care Platinum Level Certification to ensure staff competency in caring for LGBTQIA+ patients.
- **Community Outreach:** Conducting or partnering in at least two food drives or fundraising events per year for the first two years. Donating \$10,000 annually for two years to support homeless shelters or those experiencing hardship. Compliance will be documented through reports.

Palliative Care Services: Moments intends to extend its existing CHAP-certified Palliative Care program from Miami-Dade County to Broward County. This program addresses the physical, emotional, social, and spiritual needs of patients and families.

Community education programs:

- **Advance Care Planning:** The public will be offered educational sessions on using Five Wishes documents (or similar) for advance care planning, available in English and Spanish with other languages upon request. These sessions will be held at least twice a year.

CON Action Numbers: 10786 through 10792

- **Education for Care Facilities:** Educational programs will be offered to staff in skilled nursing, long-term care, and assisted living facilities at least four times a year for the first two years.
- **Internships:** Internship opportunities will be provided to students in Broward County.
- **Scholarships and Grants:** Moments will offer scholarships or grants of \$5,000 per year for two years to support minority or underserved students pursuing nursing careers in Broward County.

Community Bereavement Support:

- **Extended Bereavement Support:** Expanding bereavement support services beyond the standard 13 months, offering support for up to 24 months for those who need it.
- **Children's Bereavement Center (CBC) Partnership:** Donating \$5,000 annually for two years to support CBC's existing bereavement services.
- **Local In-Person Support Group:** Hosting a local support group open to Moments' families and the community. Collaboration with CBC or similar organizations is a possibility.
- **Grief Discovery Workshop:** Offering an annual workshop (starting year two) showcasing various grief processing methods (art, journaling, yoga, etc.) for attendees to explore and connect with others. This event will be free and open to the community.
- **Butterfly Memorials:** Conducting butterfly release ceremonies (or similar) at least four times a year for two years, starting in year two, for bereaved families of Moments and partnering facilities.
- **Children's Bereavement Support:** Collaborating with CBC or similar organizations to provide events and grief backpacks with supportive items for children experiencing loss. Backpacks will be offered to bereaved families with children upon request by the Moments bereavement team.

Community Support initiatives:

- **Toy Drives:** Organizing or participating in two toy drives during the holiday season for the first two years to aid families experiencing hardship.
- **Donations to Cancer Organizations:** Donating \$5,000 annually for three years to a non-profit supporting cancer patient or those with other serious health issues.
- **Donations to Non-Profits:** Contributing \$15,000 per year for the first three years to non-profit organizations serving underserved or disadvantaged populations.
- **Food Kitchen Support:** Providing \$10,000 annually for three years to a non-profit establishing a commercial food kitchen for families and hospitalized patients in Broward County.

Moments Hospice Foundation: Moments will donate \$10,000 per year for the first three years to its foundation to fund wish fulfillment and veterans' programs. Moments emphasizes it will not solicit donations for the foundation.

Compliance Hotline: Moments Hospice emphasizes its commitment to ethical practices by offering a 24/7 anonymous hotline through Ethical Advocate for employees to report concerns.

Condition Management: Moments acknowledges the numerous conditions outlined in this application. It expresses commitment to fulfilling these conditions, believing it will improve hospice utilization and quality of care. Therefore, a dedicated staff member will be assigned to manage, monitor, and report on compliance with these conditions.

Moments Broward believes the detailed information and proposed programs throughout this application demonstrate it is the best applicant to serve SA 10.

Challenge in Broward County: With its population exceeding 2 million, Broward County faces a growing challenge in providing adequate end-of-life care. The projected number of deaths in the county by July 2025 is estimated to be over 18,600. Currently, only seven hospice providers serve this large population, highlighting a significant gap in available services.

Moments Broward, a subsidiary of the established Moments hospice organization in Miami-Dade County, seeks to address this critical need. Leveraging its proven expertise and success in the neighboring county, Moments Broward proposes the establishment of comprehensive hospice services specifically tailored to the diverse demographics of Broward County.

Needs Assessment: Moments Broward identified underserved populations within the county. This data-driven approach ensures that its proposed programs directly address these specific needs, promoting equitable access to high-quality hospice care for all residents.

Unmet Need in Broward County: - Moments states the projected gap of 1,245 hospice admissions signifies a substantial shortfall in care provision. Notably, this need is not uniformly distributed. Senior citizens (aged 65 and over) account for a substantial portion (63 percent) of the unmet need. Furthermore, the need extends beyond cancer patients, encompassing a significant number of individuals battling other illnesses (62 percent). The applicant contends Moments Broward is uniquely

CON Action Numbers: 10786 through 10792

qualified and possesses valuable insights into tailoring programs to effectively address the specific demographics of Broward County. Recognizing the disproportionately shorter life expectancy of Black and Hispanic residents in Broward County compared to their white counterparts, Moments will provide culturally sensitive hospice care to ensure equitable access to quality end-of-life care for all residents.

Moments addresses its incorporating specialized care for cardiovascular disease, Moments' aim to ensure no resident faces this challenge without access to the appropriate support. Further, it will need various populations unmet needs including minority groups, patients with Alzheimer's diagnoses and Hispanic and Black minorities.

Moments Broward outlines nine programs designed to address these gaps, including:

- Open Access Programs Not Available in Broward County
- Level of Service Enhances Access and Quality of End-of-Life Care
- Cardiac Patients are Underserved
- Alzheimer Patients are Underserved
- Minorities are Underserved
- Opportunity to Enhance Veteran Hospice Services
- Collaboration with Senior Primary Care Clinics to Elevate Hospice Utilization Amongst Seniors
- Palliative Care as Bridge to Hospice
- Enhance Overall Hospice Utilization with Moments Specialized Programming

The applicant will detail the specific circumstances creating these unmet needs and propose its response for each group. This response will include specialized programs, resource allocation, dedicated personnel, and an action plan to meaningfully improve hospice utilization in Broward County.

Open Access - Moments Broward argues that a gap exists in hospice services for patients who would benefit from palliative care but are ineligible for traditional Medicare hospice due to a prognosis exceeding six months or a desire for ongoing treatments. The Florida definition of "terminally ill" allows for hospice care for up to one year, but Medicare reimbursement is limited to shorter timeframes. Moments proposes to address this gap by serving patients that have a prognosis of six months to one year, are receiving treatments like chemotherapy or dialysis and are unwilling to sign a Do Not Resuscitate (DNR) order.

Moments Broward emphasizes that patients retain the right to revoke hospice care at any time. Further, the Moments team respects patients' DNR decisions and provides care regardless of status -all Moments

CON Action Numbers: 10786 through 10792

nurses are CPR certified. Open Access promotes patient-centered care and respects individual needs and preferences. The applicant argues that traditional hospice providers often deny care to these patients due to concerns about reimbursement limitations for patients requiring complex care and the potential for patient rehospitalization if a DNR is not signed.

Moments Broward claims a low hospitalization rate (less than 1.8 percent) despite admitting "Full Code" patients, demonstrates the program's effectiveness.

Moments Broward acknowledges the lack of data on the number of patients who directly benefit from Open Access programs in hospice care. However, it argues that limitations to hospice access are evident through anecdotal evidence from referral sources, such as hospitals, nursing homes, and physician clinics. To gather information on these limitations, Moments met with various referral sources and garnered over 100 letters of support for its application, with a significant number specifically referencing the need for Open Access programs in the community.

Moments lists of the endorsements by facility type include:

- **Hospitals:** Multiple hospitals, including Memorial Regional Hospital, HCA Florida Westside Hospital, and Holy Cross Hospital, expressed its support for the Open Access Program.
- **Nursing Homes:** Facilities like Nspire Healthcare Plantation, Emerald Nursing and Rehabilitation Center, and Sunrise Health and Rehabilitation Center endorsed Moments Broward's approach.
- **Physician Clinics:** TruCare Medical Group and Clinical Research Center of Florida were among the clinics that highlighted the need for Open Access programs.
- **Other Organizations:** Support also came from faith-based organizations like B'nai Aviv Synagogue, indicating a broader community need.

Excerpts from these letters highlight the key points of support for Moments Broward's Open Access Program:

- **Increased access:**
 - "The open access program further illustrates Moments Hospice's dedication to servicing the community, ensuring that hospice care is accessible to all who need it, regardless of their condition," stated Memorial Regional Hospital. [Note: This quote emphasizes the applicant's focus on accessibility for all.]
- **Patient-centered approach:**
 - HCA Florida Westside Hospital noted that Moments' strategy "for engaging these communities and enhancing accessibility...aligns with our commitment to providing

comprehensive care to every segment of our community." [This quote highlights alignment with a patient-centered approach.]

- **Respecting patient autonomy:**
 - Multiple facilities praised Moments' commitment to respecting patient autonomy, particularly regarding DNR decisions. For example, Coral Gables Hospital stated, "Moments Hospice operates with a profound sensitivity to the significance of honoring patients' desires...A distinguishing feature...is their steadfast dedication to upholding patients' autonomy..."
- **Addressing gaps for underserved populations:**
 - Many letters emphasized the program's potential to benefit underserved populations. Holy Cross Hospital noted Moments' approach "addresses a significant gap in our community's health care services, particularly for the underserved populations utilizing Medicaid." [This quote highlights the potential to serve a specific underserved group.]

Moments emphasizes its commitment to providing open access care to uninsured and underinsured patients. Accepting patients on a case-by-case basis, even during ongoing treatments and respecting patient autonomy in all aspects of care, including DNR decisions.

Moments argues that the traditional hospice model often excludes patients who could benefit from its services due to factors like:

- **Ongoing medical treatments:** Some patients may desire or require ongoing treatments, even if they are terminally ill. Moments believes these patients should not be denied hospice care.
- **High deductibles or lack of insurance:** Moments acknowledges that some patients, particularly those under 65 with private insurance, face financial barriers to hospice care. Its financial assistance programs aim to address this gap.
- **Religious beliefs or desire to meet milestones:** Moments respects patients' wishes to continue certain treatments to reach important life events or for religious reasons. Moments also emphasizes its commitment to providing comprehensive hospice care regardless of the patient's religious affiliation, care choices or financial situation. Moments Broward recognizes that traditional hospice limitations may prevent some from receiving care and cites its Open Access program addresses these needs, specifically focusing on the large Hispanic, Black, and Jewish communities within SA 10.

Key elements of the Open Access program restated include

- **Respecting patient autonomy:** Moments accepts patients regardless of DNR status and allows them to continue certain

treatments like IV therapy or palliative TPN (data source not provided).

- **24/7 Admissions:** On-call staff are available for admissions any time.
- **Palliative Care Integration:** Pain and symptom management are addressed alongside patient and family education.

Key operational aspects:

- CHAP accreditation and Medicaid certification ensure adherence to quality standards and accessibility.
- Full Code acceptance reflects its commitment to patient autonomy regarding DNRs.
- Medically complex care includes services like IV therapy and TPN for patients with high acuity needs.
- Evening and weekend admissions provide flexibility for families.
- Palliative care integration remains a core component.
- National Institute for Jewish Hospice membership demonstrates its commitment to serving the specific needs of the Jewish community.
- Bridge program facilitates a smooth transition from Open Access to standard hospice care, allowing patients time to adjust emotionally, physically, and spiritually.
Moment's is a hospice provider in the adjacent Miami-Dade County and concludes it highlights the exceptional level of service Moments Miami offers including:
- **High Service Levels:** Moments Miami prioritizes high-touch care, exceeding industry standards in staff time dedicated to each patient. This translates to:
 - More frequent communication with patients and families.
 - More effective pain and symptom management.
 - Reduced unnecessary hospitalizations and emergency calls.
- **Measurable Results:** Moments Miami boasts the highest patient visit hours per day in the entire state of Florida, with a significant portion dedicated to registered nurses (RNs).
- **Focus on Patient Comfort:** The applicant enables patients to remain in assisted living facilities by providing medication administration, reducing the need for higher levels of care.
- **Commitment to Transparency:** Moments is a private company, reinvesting most Medicare reimbursements back into patient care, unlike competitors with higher overhead costs.
- **Competitive Advantage:** Compared to other applicants, Moments Miami demonstrates significantly higher visit hours and staff dedication per patient, particularly during the last week of life.
- **Rapid Response Initiative:** Moments assures a response to hospice service requests within 90 minutes, emphasizing its commitment to timely care.

CON Action Numbers: 10786 through 10792

Moments plans to replicate the success of Moments Miami:

- **Extensive Patient Time:** Moments Miami dedicates more staff time per patient than any other hospice provider in Florida.
- **Comfort in Assisted Living:** The applicant specializes in keeping patients comfortable in assisted living facilities, reducing the need for higher levels of care.
- **Focus on Quality:** As a private company, Moments prioritizes reinvesting profits back into patient care.
- **Rapid Response:** Moments assures a response to hospice service requests within 90 minutes, showcasing its commitment to timely care.

Moments Broward outlines its commitment to providing a high level of service in Broward County, comparable to that offered in SA 11. To achieve this, Moments Broward pledges to adhere to the following conditions:

- **Referral Response:** Responding to referrals within one hour and initiating the admission process within two hours, contingent upon receiving the physician's order and the patient/family's readiness to begin hospice care.
- **24/7 Triage:** Maintaining a 24-hour triage system staffed by Moments Hospice employees with video conferencing capabilities. Additionally, Moments will have registered nurses (RNs) available for admissions 24/7/365, ensuring patients receive timely symptom management around the clock.
- **Hospice Aide Visits:** Providing an average of at least five certified nursing assistant (CNA) visits per week, subject to approval by the Interdisciplinary Group (IDG), the patient, the patient's family, and the suitability of the plan of care. When necessary, patients will receive up to seven CNA visits per week.
- **Nursing Visits:** Providing an average of at least two nursing visits per week, subject to IDG, patient, family, and plan of care approval.
- **Enterprise Car Lease Program:** Acknowledging that reliable transportation is crucial for hospice visits but may pose a challenge for some clinicians, Moments Hospice will provide car leases to qualifying staff members who would otherwise be unable to work in hospice due to transportation limitations.
- **Team Member Recruitment:** Participating in at least two volunteer and/or job fairs annually for the initial two years of operation.
- **Communication & Coordination of Care:** Establishing clear communication protocols and expectations from patients and families at the time of admission is a core tenet of Moments' Communication and Coordination of Care Program.

CON Action Numbers: 10786 through 10792

- **Customization of Care:** Moments Hospice emphasizes individualized care plans created collaboratively by the Moments Hospice interdisciplinary team, the attending physician, the patient or representative, and the primary caregiver, tailored to the patient's specific needs. This customized care approach is fundamental to the "Moments Hospice Way."
- **Initial Moments Program:** This program, detailed below, would encompass all patients residing in nursing homes or care facilities. This program is designed specifically for the first week of hospice care within nursing homes or residential care facilities.

Key elements of the Initial Moments program include:

- **Prompt Response:** Moments pledges to have a staff member initiate hospice admission within 90 minutes of a family request or physician referral. This staff member will meet with the family to explain Moments' services.
- **Patient Admission Booklet:** All patients receive a customized booklet upon admission, containing essential information about Moments, patient rights, emergency procedures, and contact details. The booklet is available in multiple languages.
- **Interdisciplinary Care Team:** A designated case manager, hospice aide, chaplain, and social worker will be assigned to the patient for the initial seven days. This team aims to build trust with the patient, family, and facility staff. Consistent staff assignments are maintained throughout the hospice service period whenever possible.
- **Admit Bag:** Each new patient receives an admit bag containing personal care supplies.
- **Patient Assessment:** The care team conducts an interview with the patient or family to gather information about the patient's life history, preferences, and wishes. This information is used to create a personalized care plan.
- **Individualized Care Plan:** The hospice team and medical director develop a collaborative, patient-centered plan tailored to the specific needs of the individual. This plan is created in consultation with the patient, family, and facility staff.
- **Collaboration with Facility Staff:** For patients residing in nursing homes or similar facilities, the Moments team collaborates with caregivers and facility staff to develop a coordinated care plan. The goal is to ensure the patient's comfort throughout the hospice experience. The interdisciplinary team includes Moments staff members, a massage therapist, music therapist, medical director, volunteer director, dietician, and bereavement coordinator. Care conferences are conducted with facility staff to ensure they are informed about the care plan. Moments emphasizes its partnership

approach with these facilities, believing that collaboration leads to a better patient experience.

- **Ongoing Communication and Care Plan Adjustments:** The interdisciplinary team meets bi-weekly to evaluate and adjust the care plan as needed. Regular communication is maintained among team members, the patient, family, and facility staff.

Key characteristics of the Final Moments program include:

- **Individualized Care Plans:** Moments develop personalized, coordinated care plans for each family based on their specific needs and background.
- **Increased Visit Frequency:** The frequency and duration of visits from Moments' team members increased during this period. This includes the nurse case manager, hospice aide, chaplain, social worker, and hospice volunteers.
- **Daily Presence:** The nurse case manager and hospice aide are present daily to provide comfort and guidance to the patient and family. The social worker and chaplain provide longer visits (1.5-2 hours) as needed.
- **Emotional Support and Education:** The hospice staff offers emotional support and education tailored to the needs of each family. The applicant attends to every death, honoring both the patient and the family.
- **Legacy Projects:** Moments staff helps families create personalized legacy projects, such as photo albums, scrapbooks, video messages, or memory bears. These projects are designed to facilitate reflection on the patient's life, promote family bonding, and potentially reduce anxiety and anticipatory grief.

The applicant highlights its low 30-day hospital readmission rate (below 1.8 percent) and attributes this success, in part, to the trust established through the Initial Moments and Final Moments programs. It argues that the education provided by Moments staff and the 24/7 availability during critical periods minimize the need for readmission.

Unmet Need Addressing Complex Cardiac Disease:

Cardiac disease is the leading cause of death in the United States.

- It is the primary reason for hospitalization among Medicare patients.
- Roughly 41 percent of patients discharged with a cardiac diagnosis are readmitted within 30 days.

The applicant introduces the PATH program, designed to reduce hospital readmissions for patients with complex cardiac conditions. The applicant claims that when the PATH program is implemented, the hospital readmission rate drops to 5 percent.

Key features of the PATH program:

- **Focus on high-acuity care and complex modalities:** The program aims to manage challenging symptoms associated with advanced cardiac disease.
- **Proactive symptom management:** The program focuses on proactive management of symptoms such as angina, shortness of breath, edema, and fatigue.
- **Disease-specific education:** The program provides education tailored to the specific cardiac condition.
- **Increased Home Health Aide (HHA) visits:** The program incorporates more frequent visits from HHAs.

The applicant details the various modalities offered through the PATH program, including continued cardiac medications, high-flow oxygen therapy, nutritional counseling, and Left Ventricular Assist Device (LVAD) for short-term use.

Open Access, Veteran Programming, and Cardiac Disease Programming:

The applicant concludes the section with a case study of a cardiac patient in Miami who was able to remain at home with his spouse until the end of his life through Moments Hospice's services. This case exemplifies the program's ability to address Open Access, Veteran-specific needs, and Cardiac Disease management.

Cardiac Patients and Hospice Care

The applicant highlights the underutilization of hospice care for cardiac patients in Broward County. It presents data suggesting that only around 35 percent of cardiac patients receive hospice services, compared to 59 percent for non-cancer patients.

Reasons for Low Hospice Utilization:

- **Difficulty in Prognosis:** Predicting life expectancy for cardiac patients can be challenging, making it difficult to determine hospice eligibility (typically requiring a prognosis of six months or less).
- **Stigma:** Some patients and families may associate hospice with giving up hope or abandoning treatment.
- **Preference for Curative Care:** Patients and families may prioritize aggressive medical interventions in hopes of a cure or extended life expectancy.
- **Lack of Awareness:** Limited awareness exists among patients, families, and health care providers regarding the benefits of hospice care for advanced cardiac disease.

CON Action Numbers: 10786 through 10792

- **Communication Challenges:** Discussions about end-of-life care, including hospice, can be difficult due to emotional barriers, time constraints, or lack of training.
- **Healthcare System Factors:** Structural barriers within the health care system, such as reimbursement policies and limited hospice access, can affect enrollment.
- **Cultural and Religious Beliefs:** These can influence attitudes towards end-of-life care and decisions about hospice.

Moments proposes a multifaceted approach to increase hospice utilization among cardiac patients:

- **Moments Heart Program:** This program incorporates the previously mentioned PATH program and focuses on aggressive symptom management to improve quality of life, reduce readmission rates, and extend the hospice benefit for patients. Educational components cover end-stage disease management and symptom tracking.
- **Pharmacological Interventions:** The program includes management of oral and injectable medications, along with inotropic drips (though expensive) to improve cardiac function and patient well-being.
- **Non-pharmacological Interventions:** These encompass fluid management techniques, music and massage therapy, relaxation and meditation techniques, and emotional support to address the psychological aspects of illness. The program acknowledges the importance of emotional validation for patients.
- **LVAD Management:** Moments is prepared to manage patients with LVADs, partnering with local cardiac clinics to ensure a peaceful end-of-life experience at the patient's preferred location.
- **CHIRP Program (Cardiopulmonary Hospital Intervention & Readmission Program):** This program aims to:
 - Improve symptom monitoring and management by patients and caregivers at home.
 - Reduce hospitalizations and emergency department visits.
 - Enhance patient quality of life.
 - The program utilizes a zone assessment system to categorize symptom severity and guide interventions. Educational materials, self-management tools, and a "CHIRP Add-on Kit" with additional supplies are provided. Patients are instructed to use the term "Code CHIRP" when calling hospice to indicate a hospice emergency requiring immediate response.

Moments Hospice is seeking national certification from the American Heart Association (AHA) in palliative/hospice care for heart failure patients, which would make them the sole provider in Florida with such

CON Action Numbers: 10786 through 10792

a distinction and the only entity nationally to have all its programs involved. AHA Certification ensures:

- **Clear Program Structure:** A defined program with goals, structure, and an interdisciplinary oversight committee.
- **Well-Trained Staff:** Ongoing, tailored education for staff on managing heart failure.
- **Informed Patients & Families:** Personalized education and support materials for patients and caregivers.
- **Seamless Care Coordination:** Smooth transitions between health care providers before, during, and after home health admission.
- **Effective Clinical Management:** Proven ability to deliver quality home care for heart failure patients.
- **Continuous Improvement:** A commitment to ongoing quality improvement through data-driven practices.

Moments Broward and Heart Failure Care:

- **CHIRP Program:** This program, previously described, focuses on managing symptoms and reducing hospital readmissions.
- **AHA Certification by Year 2:** Receiving AHA certification within two years is a requirement for Moments Broward's program.
- **Respiratory Therapist:** A contracted respiratory therapist will be available from the start of Moments Broward's operations.
- **Pharmacist Consultations:** Patients will have access to pharmacists for consultations and medication recommendations.

Moments MIND program supports families facing advanced dementia:

- **Memory Support:** Create calming spaces that minimize anxiety and confusion, using familiar objects and routines.
- **Nurturing Abilities:** Identify and encourage remaining patient strengths through engaging activities.
- **Namaste Care:** Promote meaningful activities and a high quality of life through person-centered care.
- **Preserving Dignity:** Respectful communication and support help patients retain a sense of self-worth.

Moments Hospice: Advanced Alzheimer's Program

- **Symptom Management:** A team of specialists manages pain, anxiety, and other symptoms to improve quality of life.
- **Personalized Care Plans:** Tailored care plans address each patient's specific needs and preferences.
- **Family Support:** Moments provides guidance and support to caregivers, including managing behaviors and coping mechanisms.
- **Comfort & Dignity:** A nurturing environment respects patients' individuality and cultural background.
- **Respite Care & End-of-Life Planning:** Moments offers temporary relief for families and helps them make informed decisions.

Benefits of Hospice for Alzheimer's Patients include:

- **Reduced Hospitalizations:** Hospice care can significantly decrease unnecessary hospital admissions during the final stages of Alzheimer's.
- **Improved Pain Management:** Hospice programs prioritize pain management and symptom control for better patient comfort.
- **Family Support:** Hospice offers guidance and support to families caring for loved ones with dementia.
- **Increased Satisfaction:** Studies show higher satisfaction rates among families who choose hospice care for their loved ones with Alzheimer's.

Moments Broward aims to increase hospice utilization among Alzheimer's patients in Broward County. This gap exists despite the substantial number of individuals with severe Alzheimer's. Moments Miami's Success: Moments Miami demonstrates a significantly higher Alzheimer's hospice patient rate compared to Broward County. Moments Broward seeks to replicate this success by implementing similar strategies.

Despite facing a higher risk of Alzheimer's and dementia, racial and ethnic minorities often receive lower quality care. This disparity stems from both health care access issues and perceived discrimination. Moments notes that Black and Hispanic Americans are more likely to develop Alzheimer's and dementia compared to white Americans. However, they are also less likely to receive a diagnosis. A significant portion of minorities believe they will experience discrimination when seeking Alzheimer's care, which can be a major barrier to accessing services. Further, surveys reveal that minority caregivers feel unheard and disrespected by health care providers. This can create frustration and hinder communication.

Moments Broward recognizes the need to improve access to hospice care for all Alzheimer's patients, regardless of race or ethnicity.

- **Equal Access and Services:** Moments Broward is committed to ensuring equal access to hospice services for all patients. This includes outreach programs and culturally sensitive care. Moments Respect Program emphasizes respect and dignity for all patients with dementia, particularly those from minority backgrounds.
- **Interdisciplinary Approach:** A team of caring professionals works together to create a personalized care plan for each patient.

CON Action Numbers: 10786 through 10792

- **Non-Pharmacological Methods:** Moments Respect Program utilizes various non-medical methods to manage symptoms, promote comfort, and maintain patient dignity. These include:
 - **Robotic Pets:** Provide companionship, reduce anxiety, and encourage interaction.
 - **Namaste Care:** Creates a calm environment through gentle touch, soothing music, and aromatherapy.
 - **Weighted Blankets:** Promote a sense of security and reduce agitation.
 - **Fidget Blankets:** Help manage anxiety and keep patients occupied.
 - **Adaptive Utensils:** Promote independence during meals.
 - **Sensory Tools:** Provide calming tactile stimulation and evoke positive memories.
 - **The Power of Feeling Heard Program:** Provides patients and families a safe space for communication and expression.

Moments Broward's commitment to cultural sensitivity and a variety of care options ensures that all patients with Alzheimer's disease receive the respect and support they deserve.

Minorities, including Black, Hispanic, and Jewish individuals, are significantly underrepresented among Moments-Broward's hospice patients compared to the community it serves. This section confronts the documented national trend of lower hospice utilization by racial and ethnic minorities.

The argument presented here emphasizes several factors contributing to this disparity:

- **Divergent Treatment Preferences:** Studies suggest minorities might favor aggressive medical interventions near the end-of-life, potentially due to cultural or religious beliefs.
- **Knowledge Gap and Distrust:** Limited knowledge about hospice services and a general distrust of the health care system can create barriers for minorities.
- **Social and Cultural Considerations:** Traditional hospice models requiring a single primary caregiver at home might not align with the social support structures of some minority families.
- **Quality Concerns:** Research suggests that even when enrolled in hospice, minorities might receive care from lower-quality providers.
- **Provider Bias:** Unconscious bias among health care professionals might contribute to the disparity.

However, the argument acknowledges a potential solution. Studies show that Black patients who receive palliative care consultations are more likely to opt for comfort care at the end-of-life. This suggests that education and open communication can bridge the gap.

Moments details unique cultural considerations for the Hispanic community including - Cultural Emphasis on Family, Prognosis Secrecy, Indirect Communication, Negative Word Association, and Lack of Awareness about hospice services.

Moments also contends that Broward County's existing hospice agencies fall short in serving the Jewish community. It argues cultural and religious sensitivities create a barrier for Jewish people to utilize hospice services, as evidenced by the "aversion to hospice" due to concerns about "specific special needs of the Jewish people and personalized care within the framework of Jewish law and ritual not being provided." This creates a "cultural barrier to end-of-life hospice services for the Jewish population," according to the application.

Data suggests a substantial Jewish population in Broward County and surrounding areas, exceeding 149,000 according to the "Florida's Jewish Electorate Report (February 2021)". Another study (2016) indicates an estimated 149,000 Jewish persons living in Broward County, which is "a meaningful percent of the population (7.9 percent when estimated)." The application breaks down the Jewish population by geographic area, highlighting its concentration.

While acknowledging a decrease in Jewish households since 1997, Moments attributes this to the population's general aging trend, citing the "Size and Geographic Distribution of the Jewish Population, Chapter 3, 2016" study. To bolster its claim of unmet need for culturally sensitive hospice care, the applicant includes letters of support from various Jewish organizations.

Rabbi David Smith of B'nai Aviv Synagogue writes: "Moments is actively addressing the obstacles surrounding hospice care through community education initiatives...Moments Hospice's dedication to offering open access hospice care...alleviates this perceived financial burden..."

These letters highlight the value placed on culturally sensitive care and its absence in existing hospice services.

Further endorsements emphasize the importance of religious considerations in end-of-life care.

CON Action Numbers: 10786 through 10792

Rabbi Mendel Levy of Chabad Chaplaincy Network International echoes this sentiment, stating: "Recognizing the unique needs of our aging Jewish population, we value Moments Hospice's commitment to culturally sensitive end-of-life care, which resonates deeply with our organization's principles."

Similarly, Rabbi Yankie Denburg of Chabad Jewish Center commends Moments Hospice's "holistic approach to care, which extends beyond medical interventions to encompass comprehensive support services such as pain management, emotional counseling, spiritual care, and bereavement support."

This aligns with the Jewish tradition of providing comprehensive support to those facing the end-of-life. The letters also praise Moments Hospice's responsiveness to the needs of the Jewish community.

Rabbi Yossi Gansburg of Chabad Lubavitch of Coconut Creek & W Pompano Beach highlights its "profound community orientation, philanthropy, and commitment to enhancing the welfare of the underserved."

Similarly, Rabbi Yochanon Klein of Healing Hearts commends its "unparalleled rapid response time of just 90 minutes for patient admissions," addressing a critical need in the community.

Overall, the letters from Jewish organizations strongly support the applicant's claim that there is a significant unmet need for culturally sensitive hospice care within the Broward County Jewish community.

Moments contends that Broward County's existing hospice providers fall short of adequately serving the county's minority populations, particularly the Black and Hispanic communities. Data shows a substantial Black population exceeding 548,000 residents, which is 28 percent of the county's total. The Hispanic population is even larger, reaching over 664,000 residents, or 34 percent of the total population.

To highlight the issue of underserved minorities, the applicant utilizes Medicare data to compare hospice use among Black residents to the overall county rate and the rate for non-Black residents. This data reveals a persistent disparity in hospice use by Black residents. In 2022, the hospice penetration rate for Black residents lagged the non-Black rate by a significant 14.7 percentage points.

The data on Hispanic hospice use paints a similar picture. Although some recent improvement is noted, the overall hospice rate for Broward

CON Action Numbers: 10786 through 10792

County itself falls below the statewide average. This indicates a need for improvement in hospice services for both Black and Hispanic residents.

Moments acknowledges the cultural barriers faced by minority communities and proposes a plan to address them. Its approach centers on providing culturally competent care. This plan includes recruiting bilingual staff and volunteers to bridge the communication gap between hospice providers and patients with limited English proficiency.

Moments also cites the need for sensitivity in caring for the LGBTQIA+ community. Its commitment is evidenced by its pursuit of SAGE Care Platinum Level Certification, which signifies staff training and competency in caring for this specific population.

Moments Hospice's plan extends beyond providing culturally competent hospice care. The applicant expresses a commitment to supporting the broader community through charitable efforts. This includes donating to organizations that serve the homeless population and conducting food drives to assist those facing hardship.

Moments Broward also argues there is a significant opportunity to enhance veteran hospice services in Broward County and highlights the large veteran population in Broward County and the growing need for veteran-specific end-of-life care. Broward County has the 3rd largest veteran population of any county in Florida, with over 75,600 veterans. Studies suggest veterans have different needs and preferences for end-of-life care compared to non-veterans.

Moments Broward is committed to providing veteran-centered hospice care. Staff will receive specialized training on veteran-specific issues through the We Honor Veterans program. Moments Broward states it will implement a veteran outreach program and collaborate with veteran organizations. Veteran volunteers will be recruited to ensure peer support and recognition programs. Moments cites it received letters of support from veteran organizations, VA clinics, and individual veterans. The applicant also cites its condition to achieving level 4 certification in the We Honor Veterans program within two years, its specific plans for veteran outreach, recognition, and support services and its Moments Hospice Foundation will donate \$10,000 annually to fund veteran programs.

Moments plans to collaborate with senior primary care clinics throughout Broward County. This initiative aims to bridge the existing gap between the routine health care seniors receive and the specialized services offered by hospice care. Moments Broward acknowledges the invaluable role senior primary care clinics play in the lives of Broward

CON Action Numbers: 10786 through 10792

County's elderly population. Rather than seeking to replace these established health care providers, Moments envisions a collaborative approach. Its letter of support from Dr. Pedro C. Roig of Doctor Internal Medicine states, "Moments has exhibited a profound understanding of the provider-facility partnership, resulting in successful collaboration in crafting optimal care plans for our patients." Through collaboration, clinics and Moments can work together to facilitate a smooth transition for patients considering hospice care.

Moments proposes assigning a dedicated hospice care consultant specifically focused on fostering relationships with clinics throughout Broward County. This bilingual consultant, readily accessible through a dedicated phone line, will serve as a central point of contact for all hospice-related inquiries from clinic staff.

Moments Broward alleges there is the potential confusion surrounding hospice care and cites its pledge to host regular educational events for clinic staff, patients, and families.

These events, as Dr. Cesar A. Rodriguez from Moments observes, will focus on "Moments' specialized programs [which] highlight the exceptional proficiency of their team in symptom management and patient support." Clinics will have the flexibility to choose the format that best suits their needs, ranging from having a Moments consultant available during clinic hours to offering educational materials for patient e-newsletters.

Moments Broward's vision extends beyond the confines of senior primary care clinics. It plans to collaborate with clinics to organize events at churches, senior centers, and adult day care centers. This community-centric approach, as emphasized by Dr. Valentin Estrada of Pasteur Medical, is crucial because "Broward County necessitates a committed industry participant like Moments, devoted to tackling distinctive hurdles of patient engagement...".

By partnering with trusted community centers, Moments aims to create a more open and informed dialogue about hospice care, ensuring all seniors have access to the necessary information.

Moments Broward recognizes that language can be a significant barrier. To address this, all its educational materials and the dedicated hospice care consultant will be available in both English and Spanish. This commitment to inclusivity reflects the diverse community Moments serves, as acknowledged by Dr. Carlos A Lopez of TruCare Medical Group: "Broward has many diverse communities, many of which include those who are uninsured or underinsured. This open access is facilitated by Moments..."

Moments Broward offers a comprehensive suite of hospice care programs specifically designed to address the unique needs of senior populations. These programs complement the collaborative efforts with senior primary care clinics, ensuring patients receive the most appropriate end-of-life care. Here's a closer look at some of the relevant programs:

- **Pain Management:** The Triad Program tackles complex pain management, a common concern for many seniors, especially those battling cancer.
- **Fall Prevention:** The StepPrep Program proactively addresses fall risks, a significant concern for seniors living at home.
- **Neurological Disease Management:** The Synapse Program offers specialized care for patients with ALS and other neurological conditions, ensuring their specific needs are met with sensitivity and expertise.
- **Wound Care:** The Wound Program provides essential wound management services for patients who require it.
- **End-of-Life Care for Specific Conditions:** Moments offers dedicated programs for patients with Sepsis (Sepsis Program) and End Stage Renal Disease (Renal Program), ensuring these complex conditions are effectively managed during their final stages. This is not an exhaustive list, and Moments may offer additional programs as outlined in its application. The effectiveness of these programs will be documented through a signed statement. Moments seeks to expand its reach beyond Miami-Dade County by establishing a comprehensive palliative care program in Broward County, which is based on Moments' existing expertise and infrastructure to serve a new community. Benefits detailed include Moments' Experienced Team, Reduced Hospital Readmissions and Focus on Patient Choice. Like its Miami program, Moments conditions the application on obtaining CHAP certification for palliative care.

In reference to the unique needs of each patient nearing the end-of-life, Moments states it offers a comprehensive suite of specialized programs designed to enhance overall hospice utilization and ensure all receive the care they deserve. The applicant cites its

- **Core Services:** This includes programs like CHIRP (Comfort, Hope, Inspiration, Response, and Presence) that focus on creating a supportive and comforting environment for patients and families.
- **Symptom Management:** Programs like Triad address complex pain management, a common concern for many hospice patients.
- **End-of-Life Care for Specific Conditions:** Moments offers dedicated programs for patients with Alzheimer's (Moments Respect) and cardiac conditions (Moments Heart), ensuring specialized care aligns with their specific needs.

- **Emotional and Spiritual Support:** The MIND program offers comprehensive mental health and spiritual support services for patients and families.
- **Practical Assistance:** Programs like StepPrep focus on fall prevention, a significant concern for seniors living at home.
- **Veteran Support:** The We Honor Veterans program acknowledges the unique needs of veterans and ensures they receive culturally sensitive care.

Optimizing Care for Cardiac Hospice Patients

Moments recognizes that cardiac diagnoses are a leading cause of hospital readmissions due to unmanaged symptoms. The Moments Heart program tackles this challenge head-on, offering aggressive symptom management to improve patients' quality of life and reduce readmission rates.

Key Features of Moments Heart:

- **Comprehensive Education:** All patients receive education on end-stage disease management, empowering them to track vital signs and weight to identify potential issues early.
- **Multifaceted Symptom Management:** This includes:
 - **Medication Management:** Collaboration with physicians to optimize oral medications, including diuretics and antihypertensives.
 - **Intravenous/Intramuscular Interventions:** Utilizing IV/IM medications like diuretics for rapid symptom control during exacerbations.
 - **Inotropic Therapy:** In specific cases, employing medications like Dobutamine and Milrinone to improve heart function and enhance quality of life.
- **Non-pharmacological Interventions:**
 - **Supplies and Treatments:** Providing supplies like Unna Boots and Tubigrips for fluid management, and venous/arterial ulcer treatments.
 - **Holistic Therapies:** Encouraging music and massage therapy to promote relaxation and symptom management.
 - **Relaxation Techniques:** Equipping nurses with scripts for progressive relaxation and guided meditation to assist patients and families.
- **Emotional Support:** Moments incorporates "The Power of Feeling Heard" into the program, creating a safe space for patients to express their emotions related to their condition.
- **Left Ventricular Assist Device (LVAD) Management:** Moments partners with local cardiac clinics to ensure LVAD patients receive hospice care at home, avoiding unnecessary hospitalizations at end-of-life.

Benefits of Moments Heart:

- **Improved Quality of Life:** Effective symptom management translates to a more comfortable and peaceful experience for patients.
- **Reduced Hospital Readmissions:** Proactive interventions minimize the need for emergency hospital visits.
- **Peaceful End-of-Life at Home:** LVAD management allows patients with these devices to spend their final days in their preferred setting.

Moments also recognizes that chronic lung diseases like COPD significantly impact patients' lives, restricting their activity and causing anxiety. The EXPAND program addresses these challenges, aiming to improve quality of life, reduce hospital readmissions, and empower patients to "expand" their world. Challenges include COPD progressively limiting a patient's ability to participate in daily activities and shortness of breath (dyspnea) can trigger anxiety and a feeling of losing control. Moments cites its EXPAND program's multidisciplinary care plan focused on Symptom Management, Education and Support and Emotional Support.

The EXPAND program incorporates the Moments Breathe program, specifically designed for patients with advanced respiratory. Moments offers guidance and support to families facing ventilator removal decisions. Its Interdisciplinary Care Team includes doctors, nurses, music therapists, massage therapists, social workers, and chaplains work together to ensure a peaceful and comfortable experience for patients undergoing ventilator removal.

Addressing COPD and CHF: Moments CHIRP Program focuses on Symptom Management to improve quality of life, Empowerment - Equipping patients and caregivers with the knowledge and skills to manage symptoms effectively at home and reducing hospitalizations by proactive interventions aimed at minimizing unnecessary hospital visits.

Moments recognizes that ventilator dependence can be a complex and emotional issue for patients with advanced respiratory illnesses. The Moments Breathe program offers a supportive and comprehensive approach to ventilator removal, ensuring a peaceful and dignified experience for patients and their families. It involves Collaborative Decision-Making: which emphasizes open communication and guides families through each step of the process, respecting patient wishes. Moments Interdisciplinary Care Team of medical professionals – hospice medical directors, nurses, music therapists, massage therapists, social

CON Action Numbers: 10786 through 10792

workers, and chaplains – working together to ensure a holistic and supportive environment.

Moments Breathe Care Team Roles are also detailed. Moments will also implement Muse, a data-driven software program designed to optimize patient support in the crucial last week of life.

Muse analyzes vast amounts of data from patient visits to identify subtle shifts in health that indicate a potential transition within 7-10 days. Patients are categorized based on their risk of transitioning, allowing

Moments to prioritize care allocation. Clinical supervisors receive alerts for high-risk patients, prompting increased visit frequency and the initiation of the Final Moments program.

Benefits of Muse include proactive support - by identifying at-risk patients earlier, Moments can ensure they receive the additional care and comfort they deserve during their final days. Reduced Risk of Social Isolation by minimizing the chance of patients transitioning alone, guaranteeing support and companionship during this critical time. Moments' proactive approach ensures patients and families feel supported and informed throughout the end-of-life journey. Finally, Muse allows Moments to efficiently allocate resources, focusing on patients with the most urgent needs.

The Final Moments Program - comprehensive support for patients and families in the last days of life, includes: More frequent visits from nurses, social workers, and other care team members ensure patients and families receive the support they need. The focus shifts to ensuring patient comfort and emotional well-being, with pain and symptom management remaining a priority. Social workers provide crucial support and guidance to families navigating the emotional challenges of losing a loved one.

Moments Broward understands that exceptional care requires not only specialized programs but also a well-informed community and staff. Its commitment extends beyond patient care, encompassing education initiatives for both internal staff and the greater Broward County community.

Staff Education includes - Moments Specialty Programs: All staff, including the Interdisciplinary Group (IDG), will receive comprehensive training on Moments Heart, Moments Breathe, and Moments Respect programs. Nurses and certified nursing assistants (CNAs) will receive additional in-depth training specific to their roles. This training program

will be implemented as soon as Moments Broward commences operations.

Community Education is again cited and includes educational programs to the community, focusing on Cardiac disease, Pulmonary disease (including COPD), Alzheimer's disease and the significant benefits of hospice for patients with these diagnoses and their families. Moments plans to host educational events related to each of these diagnoses twice a year during its initial two years of operation. The Moments Breathe Program

Enhancing the Moments Breathe Program:

- **Respiratory Therapist:** Moments will retain a respiratory therapist to support its operations from the start. This therapist will contribute to:
 - Community education on respiratory illnesses.
 - Patient visits as part of the IDG, offering specialized insights and collaborative recommendations.
 - Staff training specific to pulmonary conditions and the Moments Breathe program.

Compassionate End-of-Life Care for Facility Residents

Moments Broward understands the unique challenges faced by nursing homes and assisted living facilities (ALFs) in caring for residents nearing the end-of-life. That's why it has developed a comprehensive approach that addresses both resident needs and facility concerns, earning the endorsement of 94 percent of Broward County nursing homes (representing 97 percent of beds) and over 40 ALFs.

Moments Broward prioritizes a smooth transition for residents entering hospice care. Its Initial Moments Program ensures clear communication and collaboration between facility staff and Moments' team. Staff training empowers facility personnel to better meet residents' needs and work effectively with Moments' hospice aides, who visit frequently to provide personalized attention and companionship.

For ALFs without medication pass capabilities, Moments offers up to two daily medication passes for its hospice patients, ensuring residents receive their medications on time. Additionally, a dedicated Moments Hospice Care Consultant acts as a liaison, fostering open communication and addressing any concerns facilities may have.

Moments Broward goes beyond the basics of hospice care. The applicant understands the importance of pets in residents' lives and offers pet therapy visits. Its Pet Peace of Mind Program helps place pets after a resident's passing, easing anxieties for both residents and their families.

Moments acknowledges the emotional and spiritual needs of residents as well. It has a Rabbi on staff and established relationships with various faith backgrounds to provide spiritual support. Music and massage therapy are available to patients as appropriate for their care plan, promoting relaxation and comfort.

Investing in the Future of Hospice Care

Moments Broward is committed to building a strong network of support for end-of-life care in Broward County. It offers educational programs twice a year for the community and four times a year for skilled nursing, long-term care, and assisted living facilities. These programs raise awareness of hospice care and empower families to make informed decisions.

Furthermore, Moments offers internship opportunities for students and scholarships/grants to support aspiring health care professionals. This commitment to education helps ensure a future workforce equipped to provide compassionate and skilled end-of-life care.

Moments Broward: Partnering with Facilities to Ensure Exceptional Care

By offering a comprehensive suite of programs, fostering strong partnerships with facilities, and investing in the future of hospice care, Moments Broward positions itself as a leader in compassionate end-of-life care for residents in Broward County. [its](#) dedication to seamless integration, individualized care, and resident well-being ensures a dignified and comfortable experience for residents and their families during this critical time.

Investing in Transportation for Staff Wellbeing

Moments understands that a dedicated and well-supported staff is essential for providing exceptional care. Recognizing the challenges of reliable transportation in some areas, Moments offers the Enterprise Fleet Car Lease Program.

This program provides staff, particularly those in rural locations, with access to safe and affordable vehicles, ensuring they can reach patients conveniently.

Moments' Commitment to Holistic Care

These unique programs exemplify Moments' commitment to providing holistic care that extends beyond traditional hospice services. By focusing on emotional, spiritual, and practical needs, Moments helps patients and families navigate the end-of-life journey with dignity, peace, and lasting memories.

Addressing Specific Needs:

- **Triad Program:** Tailored for cancer patients, this program focuses on managing complex pain through a three-pronged approach: addressing total pain, pain management education, and physician collaboration.
- **Synapse Program:** Designed for patients with ALS and other neurological diseases, this program manages a wide variety of symptoms while addressing their physical and psychosocial well-being.
- **Renal Program:** Recognizes the complexities of managing symptoms in patients with End-Stage Renal Disease (ESRD) and offers emotional support for both patients and families.
- **Namaste Care:** Provides dementia patients with unhurried care in a calming environment, utilizing aromatherapy and Reiki to manage anxiety, pain, and breathlessness.
- **Diagnosis-Specific Programs:** Moments offers specialized programs for patients with cardiac, pulmonary, and dementia diagnoses, ensuring their unique needs are addressed.

Enhancing Comfort and Quality of Life:

- **Death Doulas:** These specially trained volunteers provide compassionate support, focusing on mind-body-spirit well-being to create a peaceful environment for patients and families during the end-of-life journey.
- **Tender Moments Program:** Offers companionship, spa visits, or bedtime tuck-in visits for additional emotional support and connection.
- **Lasting Moments Program:** Helps patients find closure and create cherished memories through personalized projects like memory bears, fingerprint jewelry, or greeting cards.
- **Pet Therapy:** Certified therapy animals visit patients to bring comfort and unconditional love.
- **Music Therapy:** Music therapists use music as a therapeutic intervention to enhance patients' lives and create meaningful connections.
- **Massage Therapy:** Licensed massage therapists provide customized massage techniques to promote relaxation and manage pain.

Additional Support:

- **StepPrep Program:** Focuses on fall prevention through risk assessment and implementing appropriate strategies.
- **Tele-Triage Program:** Ensures patients receive the right level of urgency, services, and follow-up by having specially trained staff answer calls 24/7.

CON Action Numbers: 10786 through 10792

- **Wound Program:** Provides proactive treatment and care for various wounds.
- **Sepsis Program:** Offers comfort-focused care for patients with sepsis, managing symptoms like pain and fever.

Beyond Traditional Care:

- **Virtual Reality:** Allows patients to experience virtual environments, fulfilling wishes of visiting familiar places or having new experiences.
- **Death Attendance:** Moments sends a nurse to attend all deaths, honoring the patient and supporting facility staff.
- **Final Moments Program:** Increases visit frequency during the last weeks of life to provide additional support and guidance through Muse technology or similar programs to identify patients nearing the end-of-life.

Bereavement Support:

Individual and Group Counseling: Moments provides grief counseling for individuals and groups for up to 24 months after a loss. Support groups are open to anyone who has experienced loss, regardless of the cause or timeframe.

Staff Training and Development:

- **Certification and Training:** Moments invests in its staff by:
 - Paying for Hospice and Palliative Care certification
 - Offering Death Doula training in the first year
 - Providing Reiki training to staff and volunteers in the first year
- **New Hire Education:** All new staff receive comprehensive training on Moments' programs, including:
 - We Honor Veterans
 - Namaste Care
 - Cardiac, Pulmonary, and Dementia care
- Initial Moments and Final Moments programs
- Non-Pharmacological Interventions
- The Power of Feeling Heard
- **Specialized Training:**
 - Virtual Reality Champions receive dedicated one-on-one training.
- One RN/NP will have the opportunity to pursue CHPN certification.
- **Additional Training:** Moments Miami staff received training on:
 - All Moments programs
 - Working with Assisted Living Facilities
 - SAGE
 - Reiki
 - Death Doula training

Ensuring Compliance and Efficiency:

- Compliance Hotline: Moments offers a 24/7 anonymous hotline for staff to report ethical or compliance concerns.
- nVoq Technology: This platform streamlines documentation through voice-to-text technology, allowing clinicians to spend more time with patients and reducing documentation burden.

Moments Broward's dedication to staff development and bereavement services reflects its commitment to providing exceptional, compassionate care for both patients and families throughout the end-of-life journey and beyond.

Excerpts from a sample of the support letters sponsors and supporters are provided below.

The letters in their entirety are provided behind Tab V of this CON Application.

Hospitals Praise Moments Hospice:

Hospitals across the region recognize Moments Broward's commitment to high-quality care. Broward Health Coral Springs (Jillian Steer) emphasizes Moments Hospice's empathetic and holistic approach, addressing not only physical comfort but also the emotional and spiritual needs of patients. HCA Florida Northwest and Westside Hospitals (Josie Rivera-Abdo) highlights Moments' industry-leading rapid response time of 90 minutes for patient admissions, addressing a crucial challenge in the community.

Additional hospitals offered endorsements, praising Moments' patient-centered approach, focus on symptom management, respect for patient autonomy, and commitment to education. This comprehensive support underscores the critical need for Moments Broward's services and its position as a leader in the field.

Nursing Homes Endorse Moments Hospice

Numerous nursing homes across Broward County have voiced their strong support for Moments Hospice.

Key Areas of Praise:

- **Individualized Care Plans:** Many facilities commended Moments Hospice's focus on creating personalized care plans that address each patient's unique needs and preferences. (The Pearl at Fort Lauderdale Rehabilitation and Nursing Center, Plantation Nursing and Rehabilitation Center)

CON Action Numbers: 10786 through 10792

- **High Standards of Care:** Nursing homes were impressed by Moments Hospice's commitment to maintaining high standards, evident in practices like low staffing ratios and rapid response times to admissions. (OnyxHealth, Regents Park of Sunrise)
- **Compassionate and Experienced Staff:** The expertise and empathy of Moments Hospice's team, including physicians, nurses, social workers, and therapists, were frequently praised. (Superior Healthcare Management, St Johns Nursing Center)
- **Innovative Programs:** Moments Hospice's approach to hospice care goes beyond traditional models, with many applauding its use of music therapy, massage therapy, and pet therapy to enhance patient comfort. (Nspire Healthcare, Kindred Hospital South Florida)
- **Open Access Policy:** The endorsement of Moments Hospice's Open Access program, ensuring all eligible patients receive care regardless of financial background, was particularly lauded. (Sunrise Health and Rehabilitation Center, The Floridean Nursing and Rehabilitation Center)

Like nursing homes, numerous assisted living facilities in Broward County have endorsed Moments Hospice.

Key Areas of Praise:

- **Patient-Centered Care:** Many facilities were impressed by Moments Hospice's focus on creating individualized care plans that address each resident's unique needs and preferences. (DON at Assisted Living Facilities in Broward County, Residence at Pompano Beach)
- **High Standards of Care:** Like nursing homes, assisted living facilities praised Moments Hospice's commitment to maintaining high standards of care, with low staffing ratios and rapid response times for admissions being especially noted. (Havencrest Assisted Living, Coral Springs Country Club for Seniors)
- **Specialized Programs:** Moments Hospice's approach to hospice care goes beyond traditional models, with many assisted living facilities commending its use of music therapy, massage therapy, and pet therapy to enhance resident comfort, particularly for memory care residents. (HarborChase of Tamarac, Wickshire Tamarac)
- **Unrestricted Specialist Visits:** The ability to have unrestricted visits from specialists, therapists, and religious staff was seen as a significant benefit for residents and their families. (Bridgepointe Assisted Living, Hope Garden Assisted Living)

CON Action Numbers: 10786 through 10792

- **Open Access Policy:** The endorsement of Moments Hospice's Open Access program, ensuring all eligible residents receive care regardless of financial background, was again lauded. (Covenant Living of Florida, Jubilee Assisted Living)

Moments Broward has garnered a remarkable level of support from various stakeholders within SA 10 - 94 percent (17 out of 18) of acute hospitals, representing a remarkable 99 percent of licensed hospital beds, have expressed their support for Moments Broward's proposal. This signifies a near-unanimous endorsement from the area's hospitals. Similarly, nursing homes have shown overwhelming backing. 94 percent (30 out of 32) of licensed nursing homes, encompassing 97 percent of licensed beds, have endorsed Moments Broward's application. This widespread support from both hospitals and nursing homes, despite the presence of seven existing hospices in SA 10, highlights the exceptional quality of Moments Broward's proposed services.

Parkside Hospice and Palliative Care, LLC (CON application #10792) states it identifies a gap in hospice services within SA 10 and applies to address this unmet need. Its approach focuses on understanding the specific requirements of the community and tailoring its program accordingly. Parkside conducted a comprehensive needs assessment to pinpoint specific areas where hospice services could be improved. This involved analyzing data on demographics, hospital utilization, population health, and social determinants of health. Recognizing the value of local knowledge, it also held meetings with community leaders, residents, and health care workers to gain a deeper understanding of their concerns and expectations for hospice care.

Based on the findings from the needs assessment and the insights gleaned from community engagement, Parkside developed a customized hospice program proposal. This program aims to directly address the specific needs identified within Broward County. Parkside uses a well-defined methodology to project deaths and expected hospice admissions for the planning year (CY 2025). Its approach considers several factors:

- Current resident deaths categorized by age groups (0-64 and 65+) and cause of death (cancer or other).
- Projected total deaths based on historical data and population trends.
- Statewide hospice utilization rates for different age groups and diagnoses.

The data gathered during the needs assessment revealed:

- Most deaths (71.3 percent) are expected to occur among those aged 65 and over.

CON Action Numbers: 10786 through 10792

- While cancer is projected to cause 21 percent of all deaths, it represents a slightly higher proportion (26.4 percent) of hospice admissions.
- This suggests a potential need for increased hospice services for younger populations (under 65) and those with diagnoses other than cancer.

Parkside Hospice cites the projected growth in Broward County's senior population. Over the next four years, the number of residents aged 65 and over is expected to rise by nine percent. Parkside recognizes this demographic shift and acknowledges the need to expand hospice services to meet the growing demand from this age group.

The assessment also revealed disparities in hospice utilization among minority populations within the SA. Parkside is committed to addressing this gap by implementing targeted outreach and education programs. These initiatives aim to not only increase awareness of hospice care but also foster cultural sensitivity among its staff, ensuring all residents feel comfortable and understood. Specific communities within Broward County that lack adequate access to hospice care. Parkside plans to bridge this gap by collaborating with local organizations. By analyzing data on hospital discharges and information from the Centers for Medicare & Medicaid Services (CMS), it identifies areas with the greatest need and tailors its outreach efforts accordingly.

Parkside acknowledges the unique challenges faced by patients with Alzheimer's and dementia, as well as their caregivers. While the specific solution isn't mentioned here, the document likely details Parkside's approach to supporting these individuals.

Broward County boasts a significant veteran population. Parkside recognizes its service and plans to participate in the "We Honor Veterans" program. This program plays a vital role in educating veterans and their families about end-of-life care options and benefits available to them.

Growing Elderly Population:

Broward County's senior population (aged 65+) is projected to grow by 9 percent in the next four years. This necessitates an increase in hospice services to meet the anticipated demand. Parkside acknowledges this need and plans to expand its services to cater to this growing demographic. The assessment also revealed disparities in hospice utilization among minority populations.

Parkside plans to address this gap by implementing targeted outreach and education programs that promote cultural sensitivity among its staff. Additionally, the applicant will collaborate with local organizations to

improve access to underserved areas. Data analysis of hospital discharges and CMS information will guide its efforts. Specific populations with need include patients with Alzheimer's and dementia and their caregivers and Veterans.

Parkside's proposal highlights the growing need for hospice services in the area and details Parkside's commitment to providing high-quality, locally focused care.

Identified Needs:

- **Aging Population:** Broward County's senior population is projected to increase significantly in the next few years. Parkside acknowledges this demographic shift and plans to expand its services accordingly.
- **Disparities in Utilization:** Minorities in Broward County are less likely to utilize hospice care compared to white residents. Parkside plans to address this gap through targeted outreach and education programs that are culturally sensitive.
- **Underserved Areas:** Certain communities within Broward County have lower hospice penetration rates. Parkside will collaborate with local organizations to improve access to hospice services in these areas.
- **Specific Patient Needs:** The document acknowledges the unique needs of patients with dementia/Alzheimer's and veterans.

Parkside emphasizes its locally focused approach to hospice care. The applicant plans to develop disease-specific programs and outreach strategies tailored to the specific needs of Broward County residents. Additionally, it will build partnerships with local organizations to improve access to care.

Parkside's conservative forecast predicts 151 admissions in year 1 and 303 admissions in year 2. This falls below the 350-admission threshold required by the AHCA rule. However, the rule allows for a "cushion" to accommodate new programs without negatively impacting existing ones. Parkside believes its locally focused approach will allow them to capture unmet needs without harming existing hospices.

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 targeted hospice services.

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

AMOR Hospice Care, LLC (CON application #10786) argues that there are significant racial and ethnic disparities in hospice utilization within District 10, particularly in Broward County. The applicant cites multiple studies to support this claim, demonstrating that Black, Hispanic, Asian, and Native American populations have lower hospice utilization rates compared to the White population. AMOR Hospice acknowledges that Broward County, while having higher hospice penetration rates than most other areas, still shows these racial and ethnic disparities.

The applicant identifies several factors contributing to these disparities, including:

- **Cultural beliefs:** Minority families may place a high value on family caregiving and have misconceptions about hospice.
- **Spiritual/religious beliefs:** Some cultures may view hospice as conflicting with their beliefs about death.
- **Lack of trust** in the health care system due to historical marginalization.
- **Knowledge and language barriers:** Limited English proficiency and a lack of awareness or misconceptions about hospice services can be significant hurdles.
- **Low health literacy:** Difficulty understanding health information can impede informed decision-making about hospice.

AMOR Hospice acknowledges the critical need for culturally competent hospice services in Broward County, particularly for minority populations who underutilize these services. Its program offers a comprehensive approach to bridge this gap and improve end-of-life care access.

Building a Culture of Cultural Competency:

AMOR Hospice prioritizes cultural competency as an organizational cornerstone, not just a training requirement. It will achieve this through a multi-pronged approach:

- **External and Internal Expertise:** AMOR Hospice will leverage The Cross Cultural Health Care Program (CCHCP) for in-depth training across all levels, from leadership to frontline staff. This training will cover core principles of cultural competency, health disparities, and effective

CON Action Numbers: 10786 through 10792

communication skills. Additionally, AMOR Hospice plans to develop internal trainers through CCHCP's "Train the Trainer" program. This ensures ongoing, culturally relevant training becomes embedded in its organizational culture.

- **Evaluation and Continuous Improvement:** AMOR Hospice is committed to measuring the effectiveness of its training programs. It will utilize staff assessments, patient and family feedback surveys, and seek external validation from relevant organizations like We Honor Veterans or the National Institute for Jewish Hospice.

Community Education and Outreach:

AMOR Hospice recognizes the importance of educating minority communities about hospice benefits and dispelling misconceptions. To achieve this, it will:

- **Conduct a Community Needs Assessment:** AMOR Hospice will work with community leaders to understand specific needs, beliefs, and existing misconceptions about hospice care within the community. This ongoing research will inform its outreach efforts.
- **Establish Community Advisory Committees:** AMOR Hospice plans to establish Black and Hispanic advisory committees to guide the development and implementation of culturally sensitive education and outreach programs. These committees will be composed of diverse representatives reflecting the cultural makeup of the communities served.
- **Partner with Trusted Leaders:** AMOR Hospice will collaborate with religious leaders and community organizations to disseminate information about hospice services. This collaboration leverages trusted voices within the community, as exemplified by Pastor Andrew Pires of Calvary Chapel Fort Lauderdale:

“As Pastor of Calvary Chapel Fort Lauderdale, I have witnessed firsthand the importance of providing humane care to individuals and families during their time of need. AMOR Hospice Care, LLC's commitment to offering education to patients facing terminal illness is truly admirable, and we are grateful for their dedication to serving our community. Calvary Chapel Fort Lauderdale is committed to supporting AMOR Hospice Care, LLC throughout the CON application process.”

In addition, Pastor Jose Luis Gomes of Church of God Ministry Jesus Christ Intl. echoes this sentiment:

CON Action Numbers: 10786 through 10792

“Furthermore, I actively engage in initiatives aimed at enhancing the well-being and education of our community. AMOR Hospice Care, LLC's commitment to tackling the hurdles in patient access and community education highlights their dedication to serving the Broward community. Therefore, we are fully supportive of your application for CON in subdistrict 10.”

AMOR Hospice understands the importance of clear communication, especially during sensitive end-of-life conversations. It will ensure effective communication by:

- **Employing a Multilingual Workforce:** AMOR Hospice will strive to employ bilingual providers who reflect the cultural diversity of the community it serves.
- **Providing Language Interpreters:** AMOR Hospice will offer access to qualified interpreters to facilitate complex conversations and ensure clear communication with all patients and families.

By implementing this comprehensive program, AMOR Hospice aims to become a leader in culturally competent hospice care, improve access to services for underserved communities, and ultimately, provide compassionate end-of-life care that respects the unique needs and preferences of all patients and families in Broward County.

AMOR Hospice proposes a multi-pronged approach to address the underutilization of hospice services in Broward County's minority communities.

Culturally Tailored Outreach Materials: AMOR Hospice recognizes the importance of culturally appropriate education. The applicant plans to develop educational materials in multiple languages spoken within the SA, going beyond simple translation. These materials will be culturally tailored, addressing the specific concerns and end-of-life traditions of diverse Broward County demographics. The focus will be on ensuring readability and comprehension for individuals with varying literacy levels.

Bilingual Staff and Leadership: AMOR Hospice acknowledges the critical role of bilingual and bicultural staff for effective communication, particularly with the Latino community, the SA's largest minority group. The applicant has already secured bilingual leadership and are committing an additional \$20,000 towards hiring bonuses for bilingual patient care staff. Furthermore, it's community outreach program director will be bilingual in English and Spanish.

Community Outreach Program: AMOR Hospice outlines a comprehensive outreach plan to educate the community about hospice care and dispel misconceptions. This plan includes:

- **Volunteer Program:** Training community members to become hospice care educators and advocates within their social networks.
- **Educational Events:** Collaboration with local churches, community centers, and schools to organize workshops and seminars on hospice and palliative care.
- **Mobile Outreach Van:** Utilizing a dedicated van to deliver educational services directly at community events and locations.
- **Multilingual Media Campaign:** Leveraging local Spanish and Haitian-Creole media outlets (radio, television, newspapers) to broadcast educational messages about hospice care.
- **Storytelling and Testimonials:** Sharing positive experiences from families who have benefitted from hospice care to personalize the message and address common concerns.
- **Information Sessions:** Conducting educational sessions in familiar community settings to provide a comfortable space for learning and asking questions.
- **Faith-Based Partnerships:** Collaborating with local faith-based organizations to integrate discussions about hospice care within the context of religious beliefs and practices.
- **Health Fair Participation:** Participating in health fairs to provide on-site education and showcase hospice services.
- **Social Media Engagement:** Utilizing popular social media platforms to share information, answer questions, and dispel myths about hospice care.
- **Collaboration with Healthcare Providers:** Working with local health care providers to ensure information about palliative and hospice care is routinely discussed with patients.

Community Support: AMOR Hospice's approach is further bolstered by Pastor Francisco Diaz of St. Boniface Catholic Church, who commends its commitment to compassionate end-of-life care and education in a letter: "St. Boniface Catholic Church deeply understands the importance of compassionate end-of-life care and education for individuals and their families during challenging times. We have witnessed firsthand the profound impact that high-quality hospice services can have on the lives of those facing terminal illnesses. It is our belief that every individual

deserves to receive care that respects their dignity, provides comfort, and upholds their spiritual and emotional well-being. AMOR Hospice Care, LLC has expressed its commitment to excellence in hospice care, with a focus on providing personalized support tailored to the unique needs of each patient and family.

The applicant's dedication to educating aligns closely with the values and mission of our faith community. In conclusion, we enthusiastically endorse AMOR Hospice Care, LLC's application of a Certificate of Need in Sub-District 10, and we hope you consider their proposal favorably."

AMOR Hospice acknowledges the importance of ongoing feedback and plans to implement surveys to gather community input. This feedback will be used to continuously adapt the program and better meet the evolving needs of the community.

Specific Community Outreach & Education Commitments

- **Bilingual Program Coordinator:** AMOR Hospice is committed to hiring a bilingual (English/Spanish) Hospice Outreach Program Coordinator within the first three months of operation.
- **Minority Advisory Committees:** AMOR Hospice plans to establish two advisory committees within the first three months:
 - **A Hispanic Advisory Committee** with at least five members representing various cultural backgrounds within the broader Hispanic community (e.g., Cuban, Venezuelan).
 - **A Black Advisory Committee** with at least five members representing diverse cultural backgrounds within the Black community (e.g., African-American, Haitian, Jamaican). These committees will provide guidance and ensure the program is culturally sensitive.
- **Culturally Tailored Outreach:** AMOR Hospice is committed to implementing a culturally diverse and competent educational outreach program. This program will specifically target the Hispanic, Haitian, and other underserved populations identified through collaboration with program personnel and community leaders.
- **Mobile Outreach Vans:** AMOR Hospice plans to operate a dedicated van from the program's inception. This van will travel to various locations, including community centers, health facilities, churches, temples, assisted living facilities, and nursing homes, to provide hospice outreach and education directly to the community. An additional van will

CON Action Numbers: 10786 through 10792

be added when the program reaches an average daily census of 120 patients. The outreach program will provide informational pamphlets, brochures, and firsthand information about hospice services. AMOR Hospice has allocated \$50,000 to operate the initial van.

- **Educational Events:** AMOR Hospice commits to conducting at least forty-eight (48) educational events within the first two years of operation. These events will be held at local health care providers' offices, community groups, churches, schools, and other relevant locations.
- **Media and Materials Development:** AMOR Hospice has allocated an additional \$20,000 for media outreach, development of bilingual and culturally tailored materials for Broward County's diverse demographics, and other program expenses to support the community outreach program.

Arc Hospice of Florida, LLC (CON application #10787) argues that its proposed hospice program is necessary to meet the growing needs of SA 10. It contends that the Florida AHCA has identified a fixed need for an additional hospice provider in the SA.

Arc Hospice further details several areas where its program would improve access to end-of-life care, including:

- Demographic trends and expected growth in SA 10
- Overall access and availability of hospice services
- Disease-specific care
- Care for ethnic communities
- Care for the homeless and low-income population
- Care for veterans

Bonita Springs Healthcare Services, LLC (CON application #10788) identifies several populations in Broward County with unmet needs for hospice care. The application outlines a commitment to serving these groups, including:

- **Muslims:** The Muslim population in Broward County is vibrant and growing, with a significant number of mosques and Islamic centers. BSHS plans to develop outreach programs to connect with this community.
- **Homeless and Near Homeless:** This population often lacks access to health care, including hospice services. BSHS will target outreach efforts at soup kitchens, shelters, and other organizations that support these individuals. It believes education about hospice can improve access to care.
- **End-Stage Cardiac Patients:** Existing hospice data shows a lower-than-average admission rate for end-stage cardiac patients. BSHS will collaborate with local cardiologists to

CON Action Numbers: 10786 through 10792

educate them and their patients about hospice eligibility and the benefits of care. BSHS emphasizes its experience in telehealth and tele-hospice programs, which can be particularly valuable for this group.

- **Hispanics:** The Hispanic population in Broward County is diverse. BSHS acknowledges that some Hispanic groups may be less familiar with hospice or have reservations due to religious beliefs.
 - BSHS plans to create educational materials and conduct outreach programs in Spanish.
 - It will target both established Hispanic communities and more recent immigrants.
 - The applicant will partner with Catholic parishes to address concerns some Hispanics may have about hospice care conflicting with their faith.
- **Individuals in Remote Locations:** Broward County's large size can make it challenging for some residents to access hospice services. BSHS aims to bridge this gap by ensuring its services are accessible throughout the county.
- **African Americans:** Many African Americans in Broward County reside in lower-income zip codes. BSHS plans to target these areas with educational programs to increase awareness of hospice and the health care system in general. It will also assist with navigating enrollment in Medicaid or Medicare.
- **Residents of Smaller ALFs:** Residents of smaller Assisted Living Facilities (ALFs) may have limited access to hospice information. BSHS includes outreach to these facilities in its plans.

Bristol Hospice – South Florida, LLC (CON application #10789) argues there is a clear need for its proposed hospice program in Broward County. Here's a breakdown of the key points:

- **Community Need:** Broward County is projected to require more hospice admissions (1,182) than currently available within the SA (937) during the July 2025 to June 2026 planning period. This exceeds the benchmark for additional hospice programs.
- **Commitment to Underserved Populations:** Bristol emphasizes its dedication to serving all qualified patients in Broward, particularly those who have historically been underserved by hospice:
 - Low-income residents
 - Racial and ethnic minorities
 - Women

CON Action Numbers: 10786 through 10792

- People with disabilities
- Others facing barriers to hospice care
- **Community Needs Assessment:** Bristol conducted a comprehensive assessment that identified specific underserved groups:
- **Growing elderly population:** This will increase demand for hospice services and potentially change the types of services needed.
- **Facility-based patients:** Residents in hospitals or skilled nursing facilities requiring hospice care.
- **Patients with specific needs:** This includes those with Alzheimer's, Parkinson's, other neurological diseases, cancer, and stroke.
- **Racial and ethnic minorities:** Black, Hispanic, and other minority populations currently have lower hospice utilization rates compared to white residents.
- **Low-income residents:** People at or near the poverty line have lower hospice service utilization rates.
- **Veterans:** Broward County has a large veteran population.

Charis Healthcare Holdings, LLC (CON application #10790)

identifies several underrepresented groups in the SA with unmet hospice needs:

- **African American and Hispanic populations:** These groups face a higher risk of missing out on desired hospice services, particularly those with chronic conditions like heart disease, cancer, and diabetes.
- **HIV/AIDS population:** The community in SA 10 has a disproportionately high prevalence of HIV/AIDS.
- **Lower income and unemployed populations:** These groups often have limited access to health care opportunities.
- **Populations with specific conditions:** Generally, people in the SA with terminal illnesses like heart disease, cancer, HIV/AIDS, and respiratory conditions may not have access to adequate hospice care, including those who could benefit from earlier hospice enrollment.

Charis demonstrates a history of serving underserved communities throughout the country. Its experience in providing hospice care to these populations, combined with its expertise in addressing unique community needs, positions them to deliver a positive impact in SA 10. Charis highlights its extensive experience in caring for individuals with heart disease, various cancers, diabetes, and dementia.

CON Action Numbers: 10786 through 10792

Charis is committed to promoting community programs that raise awareness about end-of-life care and the availability of hospice services. The goal is for the community, families, and caregivers to be familiar with its services "before they need them." The organization also offers comprehensive staff training, with an emphasis on cardiac and respiratory hospice care. Details of its outreach and training initiatives are presented throughout the application.

With the Hispanic population growing rapidly, the need for hospice education, outreach, and financial assistance in Spanish will become increasingly important. Charis plans to address language barriers by incorporating Spanish-speaking representatives and providing educational and hospice resources in Spanish. It has a history of delivering exceptional care to Hispanic communities and diverse groups across Florida and the United States. As the Hispanic population in SA 10 ages, Charis pledges its commitment to meeting their end-of-life care needs.

Charis recognizes the evolving needs of the region and understands that outreach strategies, educational materials, and resources should be adaptable. As the demographics of the SA change, residents will benefit from Charis' diverse programs, which are designed to improve outreach and tailor hospice care to various cultural, religious, spiritual, and LGBTQ groups.

Moments Hospice of Broward, LLC (CON application #10791)

expresses its commitment to serving all patient populations in Broward County (SA 10) facing end-of-life care needs. The applicant's admissions policy encompasses all diagnoses as outlined by the AHCA in its February 2, 2024, publication, "Florida Need Projections for Hospice Programs." This includes patients of all age groups, with both cancer and non-cancer diagnoses. The applicant acknowledges the existence of underserved patient populations within the SA. However, details regarding the identification of these populations and the specific strategies to improve hospice access for them are not provided in this excerpt. The reviewer is directed to refer to Question 1 of the application (Fixed Need Pool section starting on page 25) for this information.

Parkside Hospice and Palliative Care, LLC (CON application #10792) identifies several key target populations with unmet needs for hospice care:

- **The Aging Population (65+):** Broward County's senior population is expected to grow significantly in the coming years, creating a rising demand for specialized geriatric care.

CON Action Numbers: 10786 through 10792

Parkside emphasizes accessibility, aiming to bridge the gap between the growing elderly population and available hospice services.

- **Minorities:** Black/African American communities in the SA have a lower hospice utilization rate compared to white populations. Parkside plans to address this disparity through targeted outreach and education programs, fostering cultural awareness among its staff.
- **Veterans:** Recognizing the high number of veterans in the SA, Parkside commits to participating in the "We Honor Veterans" program. This program offers veterans and their families education and support regarding end-of-life care options and benefits.
- **Underserved Counties:** Parkside acknowledges the needs of underserved counties within its SA and aims to collaborate with local partners to improve access to hospice care in these areas. Data analysis of hospital discharges and CMS data will be used to identify specific needs and tailor services accordingly.
- **Patients with Alzheimer's and Dementia:** Parkside acknowledges the challenges faced by patients with Alzheimer's and dementia, and their caregivers. It plans to incorporate the use of weighted blankets, a therapy based on deep pressure touch stimulation, to potentially improve sleep quality and reduce anxiety in these patients.

- (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.**

AMOR Hospice Care, LLC (CON application #10786) plans to provide inpatient hospice care through contractual agreements with existing health care facilities in the SA. It acknowledges that there is currently no identified need for additional inpatient hospice beds.

The focus will be on home-based care, but AMOR Hospice emphasizes its commitment to ensuring all patients have convenient access to inpatient care when needed. It will achieve this by collaborating with local providers who already have inpatient hospice beds.

CON Action Numbers: 10786 through 10792

AMOR Hospice will secure contracts with these facilities to guarantee inpatient hospice care access. The applicant will also remain attentive to the SA's needs and are prepared to present cost-effective solutions if additional inpatient beds become necessary in the future.

Arc Hospice of Florida, LLC (CON application #10787) focuses on home-based care, it also recognizes the need for additional support for patients requiring a higher level of care. To address this, Arc Hospice plans to collaborate with existing nursing homes in Broward County rather than building *its* own inpatient hospice facility currently.

Benefits of Collaboration:

Improved access for high-acuity patients: Arc Hospice will partner with facilities like Quantum Healthcare Group, which has over 430 beds across several locations in Broward County.

Strong endorsements from nursing homes: Letters from administrators at Wilton Manors Health and Rehabilitation Center and Glades West Rehabilitation and Nursing Center highlight the current challenges with communication and staffing consistency from existing hospice providers. It expresses strong support for Arc Hospice's collaborative approach and its commitment to:

- Building strong relationships with nursing home staff.
- Providing adequate staffing to ensure timely visits and effective communication.
- Offering a wider range of services, including complementary therapies, grief support, and specialized programs.
- Addressing the specific needs of minority communities.

Seamless transitions for residents: Collaboration allows for a smooth transition for residents requiring hospice care, ensuring continuity of support and better overall care during this sensitive time.

Bonita Springs Healthcare Services, LLC (CON application #10788) anticipates a minimal need for inpatient care, projecting only 4.5 percent of patient days will require it during the first two years of operation in Broward County. This translates to an estimated need for around 1.4 beds per day in year one and 3.0 beds per day in year two.

BSHS will not operate its own inpatient facilities. Instead, it plans to partner with existing nursing homes, local hospitals, and

CON Action Numbers: 10786 through 10792

hospices to secure inpatient beds as needed. The most suitable location for each patient will be determined based on a combination of factors, including its geographical location, availability of caregivers at home, and the specific care requirements of the patient.

BSHS highlights its team's extensive experience managing hospices and home health agencies. BSHS is confident in its ability to collaborate with existing inpatient providers to ensure its patients have access to necessary hospice care.

Upon receiving approval for its CON application, BSHS confirms its commitment to developing all required policies and procedures to become a licensed Florida hospice. Dr. Omer, with over ten years of experience leading a hospice program, is projected to head the new hospice service.

BSHS prioritizes providing relevant information in the appendices to demonstrate its qualifications to operate a hospice program. It believes its experience with various health care services included in its proposed care model showcases its ability to succeed. Overall, BSHS expresses confidence that its experience aligns with the Agency's requirements for new hospice providers.

Bristol Hospice – South Florida, LLC (CON application #10789) states that it will not build a separate hospice facility but instead:

- **Contract with Existing Facilities:** Bristol will partner with existing hospitals and skilled nursing facilities that are already certified by Medicare and/or Medicaid.
- **Inpatient Services Provided at Partner Facilities:** Patients requiring inpatient care will receive those services at these contracted facilities.

Charis Healthcare Holdings, LLC (CON application #10790) prioritizes establishing contracts with nursing homes, hospitals, and other health care providers to ensure effective patient care. Working with these facilities for inpatient hospice services offers several advantages:

- Increased awareness of hospice services and referral rates among health care personnel.
- Regular interaction between hospice staff, patients, families, and health care facility residents and staff, fostering opportunities for education and collaboration.

CON Action Numbers: 10786 through 10792

Charis intends to partner with hospitals and nursing homes to provide inpatient or respite care when a patient's needs cannot be effectively managed at home. It will pursue inpatient care contracts with these and potentially other area providers.

The applicant highlights its experience in promoting home and community-based care through its existing skilled nursing registries and home health agencies in Florida. Charis emphasizes its collaborative approach with staff and patients to prioritize the preferred care setting whenever possible. Educational initiatives for staff further support this goal.

Charis expresses its dedication to improving the quality of care experienced by patients in nursing homes and assisted living facilities.

Moments Hospice of Broward, LLC (CON application #10791) will provide the inpatient care component of the Hospice program through contractual agreements with Broward County nursing homes and hospitals. The applicant operates in contiguous Miami-Dade County with its office in Miami Lakes, just seven miles from Broward County. It therefore is very engaged with providers operating in both counties given the regular and normal operating pattern of seeking health care services across county lines. In fact, the closest hospital in Miami-Dade to the Broward County southern border is HCA Florida Aventura Hospital. More than 25 percent of this hospital's medical/surgical discharges are for patients residing in Broward County.

In the southern region of Broward County are the following hospitals along with the percentage of patients discharged from these hospitals who reside in Miami-Dade County:

- Memorial Hospital Miramar: 40 percent Miami-Dade residents
- Memorial Hospital West: 29 percent Miami-Dade residents
- Memorial Hospital Pembroke: 18 percent Miami-Dade residents
- Memorial Regional Hospital: 16 percent Miami-Dade residents

Miramar is the closest to the county line and has many similarities in terms of demographics, economics, and community as the Miami Lakes area. This natural ebb and flow of patients across the county line is notable and is a strong factor in approving the Moments Broward CON application.

Similarly, as expressed in many letters of support, there are physicians and long-term care facilities who treat patients from both counties. These entities don't necessarily distinguish among their patients for referral to a quality hospice provider, and therefore oftentimes refer Broward patients to Moments Miami. Moments Miami, once the address verified, must decline the assessment and potentially resulting admission.

Given its vast network within Miami-Dade including practitioners in Broward with patients from Miami Dade, Moments Broward has been able to canvass many of these potential referral sources to seek input and support for the proposal in this CON application.

During the past several months, its representatives have been meeting with hospitals, physicians, nursing homes, assisted living facilities, community organizations, and other potential referral sources. During these meetings, there were expressed encouragements for Moments Broward to seek approval to introduce its programs and services for the sources' patients. Specific areas with direct requests included number of visits per day, open access, palliative care, Jewish outreach, and minority outreach among others.

Because of its unique programming and responsiveness to SA input, Moments Broward has been able to garner a wide array of support, including the support of 17 hospitals and 30 nursing homes. These represent 94 and 99 percent of hospitals and beds, respectively, and 94 percent of nursing homes with 97 percent of nursing home beds. These providers have expressed support for Moments Broward and the intent to work with Moments Broward once it receives approval to provide hospice services in Broward County. Engagements with these providers are expected to include both routine and inpatient on a scattered bed basis.

Parkside Hospice and Palliative Care, LLC (CON application #10792) did not respond to this preference.

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

Pertinent to this rule preference, the Agency notes the following:

- *Section 400.6095 (1) Florida Statutes requires hospice programs to make its services available to all terminally ill persons and their families without regard to... diagnosis, cost of therapy, ability to pay or life circumstances*

CON Action Numbers: 10786 through 10792

- *Section 400.6095 (5) (a) Florida Statutes requires the hospice to identify the patient's primary care giver, or an alternative plan of care in the absence of the primary care giver, to ensure the patient's needs will be met*
- *Section 400.6095(5) (c) Florida Statutes requires the hospice to assess patient and family needs, identify the services required to meet those needs, and plans for providing those services through the hospice care team, volunteers, contractual providers, and community resources*

AMOR Hospice Care, LLC (CON application #10786)

acknowledges the ongoing need for high-quality hospice care for individuals living with HIV/AIDS. While overall HIV/AIDS death rates in the SA are low, the Crude Death Rate and Age Adjusted Death Rate for HIV in Broward County are significantly higher than the state averages. The provided data table shows this disparity between Broward County and Florida for the years 2013-2022.

AMOR Hospice recognizes that the HIV/AIDS epidemic is not over, and the specific needs of these patients require ongoing attention. It is committed to providing specialized care by:

- **Staff Training and Education:** AMOR Hospice will provide training and educational materials to staff regarding HIV/AIDS and caring for patients with HIV/AIDS.
- **Community Outreach:** AMOR Hospice's community outreach efforts will include educational materials, online tutorials on hospice care for patients and families, and clear online admission guidelines. This information will address eligibility criteria and educate the community on when hospice is appropriate for patients with HIV/AIDS and their families.
- **Medical Expertise:** Leading these efforts will be AMOR Hospice's Medical Director, Juan Carlos Rondon, MD, JD, CPI, FCLM. Dr. Rondon's extensive experience as an HIV/AIDS specialist for nearly 20 years will be an asset in ensuring AMOR Hospice delivers effective and high-quality care to this population.

Arc Hospice of Florida, LLC (CON application #10787)

understands that not everyone has a traditional family support system at the end-of-life. It is committed to providing high-quality hospice care to everyone in SA 10, regardless of:

CON Action Numbers: 10786 through 10792

- Having a primary caregiver at home
- Homelessness
- HIV/AIDS status

Arc Hospice recognizes the importance of comfort and support during this vulnerable time and aims to fill a critical gap for these underserved populations.

Supporting Patients Who Wish to Remain at Home:

- Arc Hospice prioritizes allowing patients to stay in their preferred environment, which is often their own home or with relatives.
- For patients without a primary caregiver, Arc Hospice will provide increased support from staff and volunteers.
- It will work with patients to develop a plan that utilizes their existing network of friends, family, and neighbors to ensure they can stay at home if desired.

Addressing the Needs of Patients Requiring Additional Support:

- Some patients may not be able to develop a support network or remain at home due to physical or mental limitations.
- In these cases, Arc Hospice may recommend transitioning to an assisted living facility, nursing home, or inpatient hospice center.
- It plans to partner with local long-term care facilities to ensure continued hospice care for these patients (letters of willingness included in Exhibit G).
- Arc Hospice staff and volunteers will continue to visit and provide care in these settings.
- To best serve all patients, Arc Hospice will build relationships with various nursing homes, assisted living facilities, and hospitals in the area.

24/7 Support:

Arc Hospice provides 24-hour support for all patients, with approximately 0.5percent of hospice days requiring continuous care.

Bonita Springs Healthcare Services, LLC (CON application #10788) commitment to providing hospice care to a wide range of patients, including those who:

- **Live alone:** BSHS offers various support systems for patients without caregivers, including social worker assistance, volunteer companionship, and exploring options like in-home paid caregivers or moving in with loved ones.

CON Action Numbers: 10786 through 10792

- **Are homeless or near homeless:** BSHS recognizes the unique challenges faced by this population and plans to:
 - Conduct educational outreach programs at shelters and food banks.
 - Train staff to be sensitive to the needs of homeless patients, including mental health and addiction issues.
 - Partner with community organizations serving the homeless.
 - Offer hospice services in shelters when deemed appropriate.
- **Have AIDS:** While AIDS is no longer a major focus of hospice due to lower death rates, BSHS assures it will serve patients with AIDS.
- **Have a variety of diagnoses:** BSHS welcomes patients with any diagnosis meeting hospice eligibility criteria. The document includes data tables (not shown here) on patient diagnoses served by other hospices for comparison.

BSHS emphasizes its commitment to providing care regardless of a patient's living situation, diagnosis, or ability to pay. It plans to achieve this through a combination of services, community partnerships, and staff training.

Bristol Hospice – South Florida, LLC (CON application #10789) emphasizes its dedication to serving all qualified hospice patients within its SA, regardless of background or circumstance. This includes:

- **Patients Without Primary Caregivers:** Bristol acknowledges the challenges faced by patients lacking a primary caregiver at home. It has a detailed procedure to address this:
- **Initial Assessment:** Bristol staff assess a patient's functional abilities during the first visit.
- **Care Plan Review:** The case manager reviews existing care plans and clarifies hospice limitations regarding 24-hour care.
- **Social Worker Support:** If needed, a social worker will visit, address care planning concerns, provide solutions for potential problems, and help arrange additional support.
- **Focus on Continuity:** This approach ensures patients remain supported and cared for throughout their time with Bristol.
- **Policy Reference:** These procedures are detailed in Bristol's Availability of Family/Caregiver policy (Exhibit 4, Policy No. 1-032, not shown here).

CON Action Numbers: 10786 through 10792

- **Homeless Patients:** Bristol will adopt a similar approach for homeless patients.
- **Comprehensive Assessment:** Social workers and staff will conduct a thorough assessment of each patient's health and social circumstances.
- **Community Resource Coordination:** The team will collaborate with local shelters, social services, and other resources to arrange suitable care settings.
- **Patients with HIV/AIDS:** An interdisciplinary team will perform a comprehensive assessment to understand the specific needs of patients with HIV/AIDS. This team will then collaborate with other Bristol staff to develop a compassionate and effective care plan.

Charis Healthcare Holdings, LLC (CON application #10790)

emphasizes its commitment to providing hospice care to all residents in SA 10, regardless of financial resources, race, ethnicity, national origin, gender, or sexual orientation.

Charis acknowledges that some populations often lack access to family support, caregivers, and adequate health care during their later years. The applicant pledges to serve all residents, utilizing available resources to create a safe and comfortable environment. As previously mentioned, Charis prioritizes enabling patients to remain in familiar and emotionally supportive settings whenever possible.

Serving Patients Without In-Home Support or with AIDS

Charis provides enhanced care to terminally ill patients who lack in-home support or who are living with AIDS. The applicant describes its efforts to develop a caregiver network and offer specialized education to staff and volunteers regarding the unique needs of patients with AIDS.

Upon receiving approval, Charis plans to establish a network of caregivers specifically designed to assist patients residing alone or who are homeless.

The applicant also intends to focus on educating the community, particularly those living alone or experiencing homelessness, about the benefits of hospice care. It aims to assist those who may lack the financial resources to access hospice services on their own. Collaboration with local shelters is identified as a key strategy. Charis emphasizes its ability to tailor hospice care to individual patient needs across all its health care operations (hospice, home health, and skilled nursing).

CON Action Numbers: 10786 through 10792

The applicant highlights its extensive experience in caring for patients with HIV/AIDS throughout its health care operations. CHARIS acknowledges the evolving needs of this population and its commitment to adapting the scope of services offered in the hospice accordingly.

Moments Hospice of Broward, LLC (CON application #10791)

emphasizes its dedication to serving all patients in SA 10, regardless of background or circumstance. Here are the key points regarding *its* commitment:

- **Open Access Policy:** Moments Broward offers hospice care to all, including those without insurance, caregivers, or a permanent home.
- **Experience with Vulnerable Populations:** The applicant has a history of serving such patients through its existing Open Access programs.
- **Serving the Homeless:**
 - Homeless patients or those without caregivers will be placed in assisted living facilities, nursing homes, or homeless shelters if necessary.
 - Pro bono care will be provided based on individual needs.
 - The Moments Hospice Foundation exists to assist patients and families facing financial hardship.
 - It will partner with local organizations to conduct outreach programs.
- **Data on Homelessness:** Moments Broward acknowledges the rising number of homeless individuals in Broward County (2,487 in 2023) and believes everyone deserves access to hospice care.

Commitment to Community:

- Beyond hospice care, Moments Broward pledges to give back to the community through various initiatives:
 - Food drives and fundraising events.
 - Annual donations to non-profit organizations supporting the homeless, those facing hardship, and cancer patients.
 - Financial support to establish a commercial food kitchen for underserved families and hospitalized patients.

Parkside Hospice and Palliative Care, LLC (CON application #10792) acknowledges the challenges faced by patients who lack a designated caregiver at home. *Its* approach focuses on maximizing

a patient's ability to remain at home while receiving quality care. Here's a breakdown of [its](#) strategies:

- **Spousal Support:** Parkside works directly with spouses to identify and address any barriers preventing them from assuming the caregiver role. This might involve providing aide or homemaker services or scheduling additional family members to assist with caregiving duties.
- **Friend Support:** Friends can be integrated into the care plan, offering specific assistance and emotional support to the primary caregiver.
- **Comprehensive Caregiver Training:** Hospice care team members provide training to caregivers on all aspects of daily patient care, including administering medications, using medical equipment, and recognizing and reporting changes in the patient's condition.
- **Volunteer Support:** Volunteers play a vital role by offering companionship, additional training on specific caregiving tasks, and practical in-home assistance to alleviate caregiver burden.

Supporting Patients Living Alone: For patients living alone, Parkside prioritizes finding family members or relatives residing nearby to provide care.

Here are some additional strategies to help patients remain at home:

- **Family Engagement:** Parkside actively engages family members in the patient's care plan. This might involve activities like music therapy or memory preservation, fostering a sense of shared responsibility and emotional support for the patient.
- **Volunteer Support:** Like patients with spouses, volunteers offer companionship and practical support to patients living alone.
- **Relocation to Familiar Surroundings:** When a suitable family member's residence is available, Parkside can facilitate moving the patient to a familiar environment, potentially reducing anxiety, and improving comfort.
- **Respite Care:** Parkside offers respite care services to give caregivers a temporary break from their caregiving responsibilities, allowing them to recharge and avoid burnout.

- **Daily Care Call Program:** This program, particularly beneficial in rural areas with dispersed patient populations, allows patients to self-report their status and trigger clinical visits when necessary.

Alternative Care Settings

If a suitable home caregiver cannot be identified, Parkside works with the patient and family to select an assisted living facility or skilled nursing facility to coordinate care. Placement requires an order from the patient's primary care physician or specialist.

- (4) **In the case of proposals for a hospice SA 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.**

This does not apply to SA 10.

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

AMOR Hospice Care, LLC (CON application #10786)

acknowledges that some hospice services fall outside the scope of typical coverage by private insurance, Medicaid, or Medicare. These services include:

- Room and board costs in nursing homes, assisted living facilities, etc.
- Emergency room or ambulance services

Arc Hospice of Florida, LLC (CON application #10787) provides hospice care services typically not covered by insurance. It recognizes that the end-of-life journey is unique and may require additional support not included in standard plans. Here is some of its non-covered programs and services:

- **Community Bereavement Services:** Open to the public, offering grief counseling and support groups for families dealing with loss. Individual counseling is available for those needing extra help navigating grief.
- **Spiritual Counseling:** Chaplains connect with patients' clergy for personalized spiritual support. Trained chaplains offer spiritual counseling, religious services, and resources. Arc Hospice partners with local clergy to provide culturally sensitive education on end-of-life care, particularly within the African American community.

- **Specialized Programs:**
 - **Jewish Population:** Staff trained to understand Jewish traditions and rituals surrounding death and dying. Collaboration with Rabbis to ensure culturally sensitive care. \$20,000 annual commitment for Jewish-specific programming and accreditation within 18 months.
 - **Palliative Arts Program:**
 - Music, pet, massage, and art therapy for relaxation, pain management, and emotional expression.
 - Storytelling, air aromatherapy, relaxation techniques, and mindfulness practices for stress and anxiety reduction.
 - Gentle exercise and stretching to improve well-being.
 - Reiki and energy healing for pain, stress, and anxiety management.
- **Veteran Support:**
 - **We Honor Veterans Program:**
 - Education and training for staff on caring for veterans at end-of-life and addressing PTSD.
 - Level 4 certification within two years and Level 5 as soon as possible.
- **Hospice for Vulnerable Populations:**
 - Arc Hospice assists veterans, homeless, and indigent patients with housing, support services, case management, medical care, medications, and hospice services.
- **Arc Bridge: Early Integration Program:**
 - Allows patients with enhanced hospice benefits to access end-of-life care services earlier than traditional criteria permit.
 - Combines palliative and curative care for a more holistic approach.
- **Unmatched Service Intensity:**
 - Arc Hospice boasts a unique program exceeding national averages for patient visits in the last days of life.
 - This includes increased visits from chaplains, CNAs, volunteers, social workers, and nurses.
 - The goal is to provide daily visits from each team member during a patient's final week, ensuring comfort and support.

CON Action Numbers: 10786 through 10792

- **Financial Commitment:**
 - Arc Hospice dedicates annual funding for programs like "Arc of Life" to fulfill end-of-life wishes for patients and families.
 - The applicant projects covering a significant portion of charity patient care annually.

Bonita Springs Healthcare Services, LLC (CON application #10788) recognizes that traditional hospice services may not meet the needs of all individuals in the Broward County community. It plans to address this by providing a variety of services that are not typically covered by insurance, such as:

- **Alzheimer's and Dementia Program:** This program focuses on improving the quality of life for patients with dementia and their families. It includes alternative therapies like music, aroma, and pet therapy.
- **Bereavement Program:** BSHS offers a comprehensive bereavement program that extends beyond the typical 12-month timeframe. This program includes grief counseling, educational materials, home visits, group activities, and memorial gatherings.
- **Pet Service Support Program:** BSHS recognizes the importance of pets in the lives of hospice patients. The applicant provides assistance with pet care, including walking, feeding, and finding homes for pets after the patient's death.
- **Volunteer Services:** BSHS has a robust volunteer program that provides companionship, emotional support, and assistance with daily tasks to hospice patients.
- **In-Home Services for Homebound Patients:** BSHS recognizes that some patients may become increasingly homebound as their illness progresses. BSHS offers a variety of services to help these patients maintain their dignity and independence, such as help with grooming and hairstyling.
- **Vigil Support:** BSHS provides vigil volunteers to be with patients in the final stages of life who have limited family or support.

By providing these services, BSHS aims to fill the gaps in traditional hospice care and ensure that all patients in Broward County have access to the care they need at the end-of-life.

Bristol Hospice – South Florida, LLC (CON application #10789) outlines its commitment to providing a comprehensive range of hospice services beyond those typically covered by insurance.

CON Action Numbers: 10786 through 10792

These additional programs aim to enhance patient comfort, well-being, and address specific needs.

- **Complementary Services:**
 - **Sweet Dreams Program:** This program focuses on nighttime routines and creating a calming environment for patients. It includes gentle touch techniques, aromatherapy, sound/music therapy, taste therapy, and basic care practices. (See Condition 1 of application and Exhibit 11 for details).
 - **Bright Moments Program:** Designed specifically for patients with end-stage dementia or Alzheimer's. This program utilizes tools like weighted blankets, therapeutic dolls, music for memory stimulation, and aromatherapy to enhance patient well-being. (See Condition 10 and Exhibit 11 for details).
 - **Advanced Illness Management (AIM) Program:** This program caters to patients with a palliative care diagnosis who may require specialized symptom management. The AIM team includes Nurse Practitioners, Palliative Care Coordinators for scheduling needs, and Social Workers/Chaplains for additional support. (See Condition 12 and Exhibit 13 for details).
 - **We Honor Veterans Program:** This program equips hospice staff and volunteers to understand and address the unique needs of veterans nearing the end-of-life. It emphasizes respectful communication, acknowledging service, and providing comfort to veterans with potential physical or psychological trauma related to its service. (See Condition 7 and Exhibit 12 for details).
 - **Virtual Reality Program:** This program offers customized virtual reality experiences tailored to a patient's cultural background. It allows patients to virtually visit meaningful locations or participate in experiences that might not be possible otherwise. For instance, veterans unable to participate in an Honor Flight can experience a virtual one, and patients can virtually "travel" to significant cultural sites. (See Condition 16 for details).

Charis Healthcare Holdings, LLC (CON application #10790) demonstrates its commitment to serving all patients in need.

- **Charitable Care Program:** Charis offers a program to provide core hospice services to patients who lack private insurance, Medicaid, or Medicare coverage.

CON Action Numbers: 10786 through 10792

- **Additional Services:** In addition to core hospice services, Charis provides various programs that go beyond traditional hospice care. These programs address topics including caregiver support, communication with patients experiencing memory issues, pain control, and grief management.

Moments Hospice of Broward, LLC (CON application #10791) emphasizes its comprehensive service offerings designed to meet the specific needs of each patient and their families. The program includes:

- **Open Access:** Coverage for uninsured patients and the ability to continue some aggressive treatments, particularly for reaching important milestones.
- **Non-Core Services (offered upon approval):**
 - Rapid response times
 - Muse technology and increased visits during the final week
 - Death Doulas
 - Virtual Reality
 - Music Therapy
 - Legacy Projects
 - The Power of Feeling Heard Program
 - Veteran-specific programming
 - Palliative Care Program
 - American Heart Association Accreditation for Palliative/Hospice Heart Failure Program
 - [List continues with various other programs]

The applicant argues that the extensive service offerings, particularly the non-core services, exceed the typical hospice program and fulfill a critical need within the community.

Parkside Hospice and Palliative Care, LLC (CON application #10792) proposes to incorporate a music therapy program led by a qualified music therapist. While music therapy is often not covered by private insurance, Medicaid, or Medicare, Parkside recognizes its value.

Research shows that music therapy can:

- Reduce depression in hospice patients.
- Lessen overall pain perception.
- Improve patient satisfaction with care.
- Provide support to patients' families during end-of-life care and bereavement.

Parkside Hospice is committed to developing a music therapy program, integrating a music therapist into its hospice team. Parkside Hospice plans to implement other special programs beyond music therapy, including Pet therapy and Sage Initiative Programs.

- (6) **Consistency with Plans. An applicant for a new Hospice program shall provide evidence in the application that the proposal is consistent with the needs of the community and other criteria contained in local health council plans and the State Health Plan. The application for a new Hospice program shall include letters from health organizations, social services organizations, and other entities within the proposed service area that endorse the applicant's development of a Hospice program.**

AMOR Hospice Care, LLC (CON application#10786) contends that its proposal aligns with both local and statewide health plans.

- **Alignment with AHCA CON Program:** AMOR Hospice references the AHCA CON program, which calls for hospice services when a gap in projected hospice coverage exists. It claim documented AHCA projections for the February 2024 hospice batching cycle support its proposal.
- **Local Health Needs Assessment (CHNA):** The Broward Regional Health Planning Council's (BRHPC) 2023 CHNA does not directly address hospice or end-of-life care, but it identifies other health disparities and needs. AMOR Hospice highlights its efforts to address low health literacy rates, an issue identified in the CHNA, through its program's features, such as bilingual staff and community outreach.
- **Florida State Health Improvement Plan:** AMOR Hospice connects its program to the Florida State Health Improvement Plan's priorities, including increased access to palliative care and hospice education. It plans to address these priorities by providing both palliative care and hospice services, along with targeted outreach to underserved populations. Additionally, the applicant will train staff on specific diseases like Alzheimer's and dementia.

The applicant also presents evidence of substantial community support for its program. This documentation includes excerpts from letters in Appendix I and endorsements from various community organizations and leaders.

Arc Hospice of Florida, LLC (CON application #10787) provides 22 letters of support in this section, from doctors and religious leaders to community organizations and university deans, that paint a compelling picture of Arc Hospice's potential to fill critical gaps in end-of-life care.

Physicians: Physicians on the front lines of caring for terminally ill patients recognized the strain on existing hospice providers. Emmanuel I. Bahamonde, a physician partner at North Beach Renal Care Associates, echoed a common sentiment: "Broward County needs another hospice provider with a commitment to cultural competency and specialized care programs."

Skilled Nursing Facilities: Existing skilled nursing facilities, the crucial intermediaries for many patients transitioning to hospice care, expressed their enthusiasm. "Arc Hospice's focus on integration with skilled nursing facilities ensures a smooth transition for patients," noted Ken Angel, Administrator of Glades West Rehabilitation and Nursing Center.

Community Organizations: Leaders of community organizations, acutely aware of the needs of their constituents, saw Arc Hospice as the missing piece. Rabbi Yosef Weinstock, Senior Rabbi of Young Israel of Hollywood - Ft. Lauderdale, offered this perspective: "Arc Hospice's commitment to cultural sensitivity and building relationships with faith leaders is a step in the right direction to serve the diverse needs of Broward County."

Religious Leaders: Religious leaders recognized the importance of spiritual support during end-of-life care. Rabbi David Spey, Rabbi of Temple Bat Yam of East Fort Lauderdale, stated, "It's crucial that hospice care addresses the spiritual needs of patients and their families. Arc Hospice seems well-positioned to do that."

Academics: The focus on education resonated with representatives from Nova Southeastern University. Dr. Karen Grosby, Dean of the College of Psychology, highlighted Arc Hospice's "multi-disciplinary approach to collaborating with local community leaders to educate families on the bereavement aspects of hospice."

Healthcare Professionals: Healthcare professionals on the ground were impressed by Arc Hospice's patient-centered approach. Dr. Roneo Penalver, a Family Medicine Physician, praised its "commitment to providing high-quality in-home hospice care, respecting patients' wishes and providing them with the dignity and support they deserve."

Community Leaders: Community leaders, from the Mayor of Hollywood to the CEOs of influential organizations, saw Arc Hospice as a beacon of hope. Jennifer O'Flannery Anderson, President & CEO of the Community Foundation of Broward, expressed her enthusiasm: "Arc Hospice's plans to increase the availability of hospice services and their focus on underserved communities will be a tremendous addition to our community."

Bonita Springs Healthcare Services, LLC (CON application #10788), states, "In the past an applicant for a new hospice program provided evidence in the application that the proposal would be consistent with the needs of the community and other criteria contained in local health council plans and the State Health Plan. The application for a new hospice program included letters from health organizations, social services organizations, and other entities within the proposed SA that would endorse Bonita Springs Healthcare Services LLC's development of a hospice program. That is no longer needed as local health councils no longer prepare such plans and the most recent State Health Plan is outdated. The most recent plan for 2022-2026 does not address Hospice."

Bristol Hospice – South Florida, LLC (CON application #10789) has included a comprehensive set of letters in Exhibit 2 (not shown here) demonstrating widespread community support for its proposed hospice program.

- **Letters of Support:** A variety of individuals and organizations have submitted letters endorsing Bristol's application. An outline of these supporters is provided below, with excerpts from some letters included in the Project Summary (not shown here).
 - Support Groups
 - Physician Providers
 - Assisted Living Facilities
 - Skilled Nursing Facilities
 - Home Health Agencies
 - Hospitals
 - Referral Organizations
 - Community Members/Organizations (including representatives from the Alzheimer's Association, Death with Dignity, and local businesses)
 - Hospice Advisors and Industry Professionals
 - Religious Organizations

Charis Healthcare Holdings, LLC (CON application #10790) does not directly respond to this preference.

Moments Hospice of Broward, LLC (CON application #10791) confidently asserts its proposed hospice program aligns perfectly with the needs of the community and the guidelines established by jurisdictional documents. Extensive outreach efforts have resulted in a wealth of support, with over 180 letters of endorsement from Broward County's health care organizations, social service agencies, and other entities. These endorsements demonstrate a clear understanding of the community's needs and Moments Broward's commitment to fulfilling them. The detailed plans outlined within this application showcase how Moments Broward will deliver hospice care that adheres to the established criteria and effectively addresses the unmet needs of Broward County residents.

Moments Hospice has secured a remarkable level of support in Broward County, as evidenced by the following:

- **Letters of Recommendation:** 187 letters of support were received from a wide range of organizations, demonstrating broad community backing.
- **Hospital Systems:** All seven acute care hospital systems in Broward County endorsed Moments Hospice, highlighting its significance for patient care.
- **Miami-Dade County:** Major institutions in Miami-Dade County, which discharge patients to Broward, also expressed their support.
- **Nursing Homes:** An impressive 30 out of 32 nursing homes in Broward County, representing nearly all licensed beds, endorsed Moments Hospice.
- **Assisted Living Facilities:** Over 40 assisted living facilities provided letters of support, indicating Moments Hospice's value for this population.
- **Veteran Organizations:** Support came from Veterans organizations, including the VA Clinic and Veteran Advocacy groups, ensuring care for veterans in Broward County.
- **Medical Providers:** More than 35 physicians, medical clinics, and other care providers endorsed Moments Hospice, signifying trust within the medical community.
- **Jewish Organizations:** Numerous Jewish organizations and synagogues expressed their support, highlighting Moments Hospice's sensitivity to their community's needs.
- **Community Organizations:** Many other organizations, including Make-A-Wish, Children's Bereavement Center, and

Senior Care Foundation, endorsed Moments Hospice, showcasing its broader impact on the community. This overwhelming display of support from various sectors indicates that Moments Hospice is seen as a vital resource for Broward County.

Parkside Hospice and Palliative Care, LLC (CON application #10792) states that while there is no current State Health Plan, the 2020 Florida Community Health Assessment report (referenced in Exhibit 4) supports the need for hospice care as identified in Section 1 (Need Analysis) of this application. The applicant's key points include

- **Socioeconomic factors:** Lower-income areas often have limited access to health care, impacting overall health outcomes.
- **Tobacco use:** High tobacco use rates in Florida contribute to deaths from cancer, lung disease, and respiratory illnesses.
- **Broward County death rates:** Compared to the state average, Broward County has higher age-adjusted death rates for the top five causes of death. Additionally, the overall age-adjusted death rate for all causes is higher in Broward County.
- **Health professional shortages:** The Community Health Assessment also highlights areas with shortages of health care professionals, particularly in rural and low-income communities.

Letters of Support:

The applicant has included letters of support from various entities, including hospitals, nursing homes, physicians, nurses, and a social service organization. These endorsements demonstrate the community's need for additional hospice services.

b. Chapter 59C-1.0355, Florida Administrative Code contains the following general provisions and review criteria to be considered in reviewing hospice programs.

(1) Required Program Description (Rule 59C-1.0355(6), Florida Administrative Code): An applicant for a new hospice program shall provide a detailed program description in its certificate of need application, including:

(a) Proposed staffing, including use of volunteers.

AMOR Hospice Care, LLC (CON application #10786) outlines its proposed staffing model for the first two years of

CON Action Numbers: 10786 through 10792

operation. Year one FTE is 24.55 and year two is 38.91. The staffing plan includes a mix of full-time equivalent (FTE) positions and contracted services.

Staff Positions (FTEs):

- Administrative and Executive Staff
- Medical Records and Coding
- Professional Relations Representatives
- Volunteer Coordinator and Community Outreach
- Bereavement Specialist
- Clinical Staff
- Registered Nurses (RNs)
- Certified Nursing Assistants (CNAs)
- Social Worker
- Chaplain
- Nurse Practitioner
- Medical Director (contracted)
- Team Director/Coordinator
- Patient Access Admissions RNs
- Weekend Patient Access Staff
- On-Call RNs
- Hospice Care Center (HCC) Staff (LPNs and CNAs)

Volunteer Program:

AMOR Hospice plans to develop a volunteer program with a minimum of 10 volunteers after one year of licensure.

Volunteers will fill various roles, including:

- Patient Care Volunteers: Providing companionship and respite care to patients.
- Bereavement Support Volunteers: Offering support services to families and caregivers.
- Administrative Volunteers: Assisting with general office and community tasks.

Guardian Angel Services:

AMOR Hospice is committed to establishing a "Guardian Angel Services" program. This program will consist of specially trained volunteers who can be called upon to provide presence and support during a patient's final hours of life, particularly for patients without family support or those who need additional assistance.

CON Action Numbers: 10786 through 10792

Arc Hospice of Florida, LLC (CON application #10787) will deliver hospice services through a qualified interdisciplinary team comprised of nurses, physicians, social workers, chaplains, hospice aides, and volunteers. The specific staffing plan for the proposed program is detailed in Schedule 6 of the application. Key leadership positions include a Medical Director and an Administrative Director. The Administrative Director will oversee all administrative aspects of the program within SA 10, supported by an Assistant Director of Operations. Arc Hospice projects a total of 24.05 full-time equivalent (FTE) staff dedicated to serving the program in Year One, increasing to 41.55 FTEs in year two.

The applicant highlights the experience it brings to the table. Arc Hospice operates an existing hospice program in Georgia, manages affiliate programs, and has an approved (but not yet operational) program in SA 3E. The proposed program in SA 10 is expected to benefit from this extensive experience in providing high-quality hospice care. Samples of policies and procedures that will be implemented in the new program are included in Exhibit F. Additionally, the new program will leverage the knowledge and expertise gained through relationships with existing programs to ensure high-quality service delivery from the outset.

Arc Hospice expresses confidence in its ability to recruit and retain the necessary staff for the project. It has a proven track record of successful recruitment across all required personnel categories using various methods and processes. The application anticipates no significant challenges in recruiting, developing, training, and retaining qualified staff.

The applicant acknowledges the presence of several local community colleges with nursing programs. Arc Hospice plans to support these programs by offering student shadowing opportunities with its hospice program nurse case managers. This will allow students to gain firsthand experience in hospice care and potentially explore this career path. It emphasizes the opportunity for students to witness the positive impact hospice care can have on patients and the community.

Volunteers: Arc Hospice recognizes the vital role volunteers play in providing hospice care to patients and their families. All Arc Hospice volunteers undergo a comprehensive training

CON Action Numbers: 10786 through 10792

program to prepare them for their specific roles. Training equips volunteers to provide various services such as respite care, companionship, transportation, supportive visits, homemaking, sharing special talents, and bereavement support. Volunteers may receive additional training based on their assigned tasks. The applicant has already begun establishing relationships within the SA to facilitate the rapid identification and recruitment of hospice volunteers to support the program.

The proposed program is expected to benefit from Arc Hospice's established record of success in recruiting, training, and utilizing volunteers in hospice services. Some volunteers may be assigned office tasks such as filing, copying, and preparing informational materials or patient assessment packets used by the care team. Other volunteers or volunteer groups may participate in fundraising activities. All volunteers will be supervised by designated staff members. Based on Arc Hospice's experience, it anticipates that at least five percent of patient care hours will be provided by hospice volunteers. This aligns with the percentage requirement mandated by the Medicare program.

Bonita Springs Healthcare Services, LLC (CON application #10788) is confident in its staffing abilities for its new hospice program. The applicant projects serving 220 patients in the first year, growing to 426 patients in year two. To meet these patient needs, BSHS anticipates needing around 22 employees in year one, including nurses and hospice aides. This number is expected to grow to 30.7 employees in year two.

The application highlights that Dr. S. Mamoona Omer, a hands-on administrator, will be joining the executive staff upon approval.

Condition #15 covers the Volunteer program proposed by BSHS.

Bristol Hospice – South Florida, LLC (CON application #10789) outlines *its* proposed staffing plan for the first two years of operation. Details regarding specific salaries and assumptions can be found in Schedule 6A.

CON Action Numbers: 10786 through 10792

Year One FTE is 22.85 and year 2 is 42.49.

- **Staffing Table (Table 17):** This table summarizes the projected number of Full-Time Equivalents (FTEs) for various positions in year one and year two. Key positions include:
 - Registered Nurses (RNs) - Full-time and PRN
 - Nurse Practitioner
 - Certified Nursing Assistants (CNAs)
 - Administrative Staff: Executive Director, Director of Patient Care Services, Business/Clerical
 - Clinical Staff: Licensed Clinical Social Worker, Spiritual Coordinator (Chaplain), Bereavement Coordinator, Hospice Liaison
- **Volunteer Staff:**
 - Bristol anticipates having 10 volunteers by the end of year one and 20 by the end of year two.
 - Exhibit 4, Policy No. 9-020 (not shown here) details Bristol's Hospice Aide Services Policy.
- **Volunteer Role:** The primary focus of hospice volunteers is to provide companionship and emotional support to patients and their families. Duties vary based on individual needs and may include:
 - Companionship
 - Activities (games, reading)
 - Outings
 - Meal preparation
 - Errands
 - Transportation assistance
 - Respite care for family caregivers

Charis Healthcare Holdings, LLC (CON application #10790) presents the following chart:

Position	Year One FTE Total	Year Two FTE Total
Director of Nursing	1	1
Secretary	3	5
Medical Director	1	1
Registered Nurse	6	6
LPN	6	6
Nurses' Aides	6	6
Chaplain	3	3
Social Services Director	3	3

Source: CON application #10790, Schedule 6.

Charis clarifies that certain staff positions and support functions for the proposed hospice program in SA 10 will be shared resources with its existing neighboring operations.

CON Action Numbers: 10786 through 10792

This cost-sharing approach applies to overhead functions such as:

- General bookkeeping
- Accounts payable and financial reporting
- Education and training
- Quality assurance
- Information technology
- Human resources (including payroll and benefits administration)

Moments Hospice of Broward, LLC (CON application #10791) proposes the following staffing plan for its hospice program:

- Year One: 28.1 full-time equivalent (FTE) staff
- Year Two: 56.1 FTE staff

This excludes contracted staff and is detailed in Schedule 6 of Tab III of the CON application. Charis argues that the focus on FTE nurses, aides, social workers, and chaplains demonstrates a deep commitment to patient care. It believes this staffing model distinguishes them from competing applicants.

Parkside Hospice and Palliative Care, LLC (CON application #10792) outlines its staffing plan for the first two years of operation in Schedule 6 (located behind Tab 5, Resources). This schedule does not include volunteers, although a Volunteer Coordinator position is listed on lines 27 and 28. Schedule 6 shows 14.3 year one FTEs and 23.05 year two FTEs. Parkside notes federal regulations mandate that hospices dedicate at least five of the total patient care hours to volunteers. These volunteers can fulfill various roles, including direct patient care, bereavement support, errands, and general patient and family assistance.

Parkside's Exhibit 3 includes its Volunteer Policy and Procedure for further details on its volunteer program.

(b) Expected sources of patient referrals.

All applicants anticipate referrals from a broad range of sources within the community. These sources include:

- Physicians
- Hospitals
- Nursing Homes
- Assisted Living Facilities
- Home Health Agencies

CON Action Numbers: 10786 through 10792

- Family and Friends
- Patients Themselves
- Faith-Based Organizations
- Insurers
- Community Health Centers and Organizations

AMOR Hospice Care, LLC (CON application #10786)

highlights its letters of support as evidence of established connections with various referral sources. These letters come from clinical staff, operational leaders at hospitals, home health agencies, community health organizations, PACE programs, faith communities, local physicians, nursing homes, and other community members.

Arc Hospice of Florida, LLC (CON application #10787) will utilize the sources listed above.

Bonita Springs Healthcare Services, LLC (CON application #10788) in addition to the sources listed above, plans to reach its goals through outreach programs focused on underserved communities, including:

- Muslim, Hindu, African American, and Hispanic communities
- Religious leaders
- Homeless service organizations

Bristol Hospice – South Florida, LLC (CON application #10789) will utilize the sources listed above.

Charis Healthcare Holdings, LLC (CON application #10790) outlines its plan to develop a network of referral sources for its hospice program but will also use the sources cited above.

Charis intends to implement outreach and marketing programs to raise awareness within SA 10. These efforts will focus on:

- Promoting its core values, vision, and guiding principles
- Educating the community about advanced care planning
- Highlighting the benefits of hospice services, pain relief, symptom control, and intensive palliative care

CON Action Numbers: 10786 through 10792

The applicant emphasizes the importance of community familiarity with its services according to the philosophy of "know us before you need us." Charis also plans to leverage its existing network of liaisons and healthcare representatives throughout SA 10 to facilitate referrals.

Moments Hospice of Broward, LLC (CON application #10791) argues that attracting patients will not be difficult due to the published need for additional hospice services in SA 10 and its extensive outreach and community networking efforts. Moments anticipates referrals from a variety of sources including:

- Hospitals (all Broward County hospital systems represented in letters of support).
- Physicians
- Nursing homes (94 percent of SA 10 nursing homes with letters of support).
- Assisted living facilities
- Other healthcare providers
- Family members
- Patients themselves

Moments states its significant level of support for its application evidenced by letters from a vast network of healthcare providers and community organizations demonstrates a strong referral base for its hospice program.

Parkside Hospice and Palliative Care, LLC (CON application #10792) will utilize the sources listed above.

- (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.**

**AMOR Hospice Care, LLC (CON application #10786)
Projected Year One and Year Two Admissions by Payer**

	Year One	Year Two
Medicare	220	335
Medicaid	12	17
Commercial	10	15
Self-Pay	0	0
Indigent	5	7
Total	247	374

Source: CON application #10786, Page 68, 6(c).

CON Action Numbers: 10786 through 10792

**Arc Hospice of Florida, LLC (CON application #10787)
Projected Year One and Year Two Admissions by Payer**

	Year One	Year Two
Medicare	287	435
Medicaid	11	16
Commercial	8	12
Self-Pay	3	5
Total	309	468

Source: CON application #10787, Page 201, Figure 49.

**Bonita Springs Healthcare Services, LLC (CON application #10788)
Projected Year One and Year Two Admissions by Payer**

Payer	Year One	Year Two
Medicare	206	399
Medicaid	12	23
Private Insurance	0	4
Self-Pay/Uncompensated	2	0
Total	220	426

Source: CON application #10788, Page 99, Table 38.

**Bristol Hospice – South Florida, LLC (CON application #10789)
Projected Year One and Year Two Admissions by Payer**

Payer	Year One	Year Two
Medicare	191	396
Medicaid	4	9
Commercial	10	22
Self-Pay	11	9
All Payers	217*	435*

Source: CON application #10789, Page 48, Table 19.

*Totals for All Payers for year 1 are 216 and 436 for year 2.

**Charis Healthcare Holdings, LLC (CON application #10790)
Projected Year One and Year Two Admissions by Payer**

Payer	Year One	Year Two
Medicare	1,000	1,500
Medicaid	200	275
Private Pay	50	75
VA Tri-Care	150	200
All Payers	1,400	2,050

Source: CON application # 10790 (No Page numbers)

**Moments Hospice of Broward, LLC (CON application #10791)
Projected Year One and Year Two Admissions by Payer**

Payer	Year One	Year Two
Medicare	189	428
Medicaid	16	36
Charity	11	26
Insurance	11	26
All Payers	228*	516

Source: CON application #10791, Page 175 (c)

*Totals for All Payers for year 1 are 227.

CON Action Numbers: 10786 through 10792

**Parkside Hospice and Palliative Care, LLC (CON application #10792)
Projected Year One and Year Two Admissions by Payer**

Payer	Year One	Year Two
Medicare	136	273
Medicaid HMO	8	15
Commercial	6	11
Self-Pay	0	2
Charity	1	2
Total	151	303

Source: CON application #10792, (No page numbers) Table 2-2.

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

**AMOR Hospice Care, LLC (CON application #10786)
Projected Year One and Two Admissions by Type of Terminal Illness**

	Year One	Year Two
Cancer	50	76
Non-Cancer	197	298
Total Admissions	247	374

Source: CON application #10786, Page 84, 6(d).

**Arc Hospice of Florida, LLC (CON application #10787)
Projected Year One and Two Admissions by Type of Terminal Illness**

	Year One	Year Two
Cancer	86	130
Non-Cancer	223	338
Total Admissions	309	468

Source: CON application #10787, Page 201, Figure 50.

**Bonita Springs Healthcare Services, LLC (CON application #10788)
Projected Year One and Two Admissions by Type of Terminal Illness**

	Year One	Year Two
Cancer	48	94
Non-Cancer	171	333
Total Admissions	220*	426

Source: CON application #10788, Page 100, Table 40.

*Year 1 total is 219 and year 2 is 427.

**Bristol Hospice – South Florida, LLC (CON application #10789)
Projected Year One and Two Admissions by Type of Terminal Illness**

	Year One	Year Two
Cancer	46	91
Non-Cancer	171	344
Total Admissions	217	435

Source: CON application # 10789, Page 48, Table 20.

**Charis Healthcare Holdings, LLC (CON application #10790)
Projected Year One and Two Admissions by Type of Terminal Illness**

	Year One	Year Two
Cancer	600	800
Non-Cancer	622	1,250
Total	1,222	2,050

Source: CON application # 10790 (No Page numbers)

CON Action Numbers: 10786 through 10792

**Moments Hospice of Broward, LLC (CON application #10791)
Projected Year One and Two Admissions by Type of Terminal Illness**

	Year One	Year Two
Cancer	70	139
Non-Cancer	157	37
Total	228*	516

Source: CON application #10791, Page 175 (d)

*The total for year 1 admissions is 227.

**Parkside Hospice and Palliative Care, LLC (CON application #10792)
Projected Year One and Two Admissions by Type of Terminal Illness**

	Year One	Year Two
Cancer	39	79
Non-Cancer	112	224
Total Admissions	151	303

Source: CON application #10792, (No page numbers) Table 2-3.

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

**AMOR Hospice Care, LLC (CON application #10786)
Projected Year One and Two Admissions by Age**

	Year One	Year Two
Under 65	63	96
65+	184	278
Total	247	374

Source: CON application #10786, Page 84, 6(e).

**Arc Hospice of Florida, LLC (CON application #10787)
Projected Year One and Two Admissions by Age**

	Year 1	Year 2
Under 65	33	49
65+	276	419
Total	309	468

Source: CON application #10787, page 201.

**Bonita Springs Healthcare Services, LLC (CON application #10788)
Projected Year One and Two Admissions by Age**

	Year One	Year Two
0-64	28	55
65 & Older	192	371
Total	220	426

Source: CON application #10789, Page 101, Table 41.

**Bristol Hospice – South Florida, LLC (CON application #10789)
Projected Year One and Two Admissions by Age**

	Year One	Year Two
Under 65	23	45
65+	194	390
Total	217	435

Source: CON application # 10789, Page 49, Table 21.

CON Action Numbers: 10786 through 10792

**Charis Healthcare Holdings, LLC (CON application #10790)
Projected Year One and Two Admissions by Age**

	Year One	Year Two
Under 65	350	494
65+	1,050	1,537.5
Total	1,400	2,031.5

Source: CON application # 10790 (No Page numbers)

Charis states that, "...The reliability of CHARIS' overall volume projections in this application is supported by actual experience in hospice services throughout the country." The reviewer notes Charis has differing admissions between its categories.

**Moments Hospice of Broward, LLC (CON application #10791)
Projected Year One and Two Admissions by Age**

	Year One	Year Two
Under 65	27	66
65+	201	450
Total	228	516

Source: CON application #10791, Page 176 (e)

Parkside Hospice and Palliative Care, LLC (CON application #10792) does not respond to this review criteria.

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

Pertinent to this rule preference, the Agency notes the following:

- **Section 400.609 (1) (a) & (b) Florida Statutes,** states (a):
 - *The hospice care team shall directly provide the following core services: nursing services, social work services, pastoral or counseling services, dietary counseling, and bereavement counseling services. Physician services may be provided by the hospice directly or through contract. A hospice may also use contracted staff if necessary to supplement hospice employees in order to meet the needs of patients during periods of peak patient loads or under extraordinary circumstances*

- (b):
 - *Each hospice must also provide or arrange for such additional services as are needed to meet the palliative and support needs of the patient and family. These services may include, but are not*

CON Action Numbers: 10786 through 10792

limited to, physical therapy, occupational therapy, speech therapy, massage therapy, home health aide services, infusion therapy, provision of medical supplies and durable medical equipment, day care, homemaker and chore services, and funeral services

AMOR Hospice Care, LLC (CON application #10786)

outlines a service delivery model that combines directly provided services with contracted services.

- **Directly Provided Services:** AMOR Hospice will directly employ staff to provide core hospice services, including:
 - Physician services
 - Nursing services
 - Home care aides
 - Medical social services
 - Bereavement counseling
 - Dietary counseling
 - Spiritual counseling
 - Pharmacy services
 - Durable medical equipment and medical supplies
 - Volunteer services
 - Infection control
 - Quality measurement and reporting
 - Community outreach and education
- **Contracted Services:** AMOR Hospice will contract with outside providers for the following services:
 - Medical Director
 - Alternative therapies
 - Inpatient general care
 - Inpatient respite care

The applicant emphasizes that it will retain administrative, clinical, and legal responsibility for all care provided, even when delivered by contracted staff. Additionally, AMOR Hospice will directly provide any services mandated by state and federal regulations.

Arc Hospice of Florida, LLC (CON application #10787) outlines the core services that Arc Hospice staff will directly deliver to patients. These core services include:

- Care/Case Management
- Hospice Home Care
- Bereavement Services
- Respite Services
- After Hours Nursing Triage Services

CON Action Numbers: 10786 through 10792

- Nursing Services
- Social Services
- Dietary Counseling
- Spiritual Counseling/Chaplains
- Veterans Services
- Patient Intake: Evaluation, Plan of Care
- Evening and Weekend Care
- Infusion Services
- Pharmacy Services
- DME (Durable Medical Equipment) and Medical Supplies
- Physician Services/Medical Director
- Patient and Family Education/Support
- Volunteer Services

In addition to direct patient care, the application highlights the quality assurance measures Arc Hospice will implement, including Quality Measurement and Reporting and Infection Control. The applicant also states its integrative therapies promote patient and family well-being. Arc also cites its Professional/Community Outreach and Education. To gather feedback and improve service delivery, Arc Hospice will utilize patient/family surveys.

Finally, the applicant describes the comprehensive administrative support provided by Arc Hospice's parent company, American Hospice Systems. These in-house services encompass:

- Billing and Collections
- Finance
- Human Resources
- Staffing, Recruitment
- Education/Training
- Information Technology
- Risk Management
- Managed Care Contracting
- Marketing and Public Relations
- Legal Services
- Compliance
- Real Estate/Leasing
- Purchasing/Procurement
- Contract Administration
- Maintenance
- Reporting/Decision Support
- Medical Records
- Governance Support

CON Action Numbers: 10786 through 10792

- Licensure/Accreditation
- Website Management
- Advocacy/Public Policy
- Policies and Procedures

Bonita Springs Healthcare Services, LLC (CON application #10788) states it will meet all state and Medicare guidelines to become a Medicare-certified hospice including the provision of the following core services:

- Physician services,
- Nursing services,
- Social work services,
- Pastoral or counseling services,
- Dietary counseling,
- Home health aide services, and
- Bereavement counseling services.

To provide these core services Bonita Springs Healthcare Services LLC will hire full time, part time or PRN staff paid by the hospice including:

Table # 42: Staffing

Description	Hospice Employees and Volunteers	Contract
Administrator	Yes	
Director of Clinical Services	Yes	
Chaplain (Spiritual Counselor)	Yes	
Social Worker	Yes	
Hospice Liaison Marketing	Yes	
Office Manager Clerical Staff	Yes	
Billing Clerk	Yes	
Bereavement Counselor	Yes	
Medical Director		Contract
Alternate Medical Director		Contract
Continuous Care – RNs, LPNs, HHAs	Yes	
Hospice Liaison Pt. Care	Yes	
PT/OT/ST		Contract
Alternative Integrative Therapies		Contract
RN's	Yes	
Hospice Aides/Homemakers	Yes	
Volunteer Coordinator	Yes	
Volunteers	Yes	
Dietary Counselor		Contract
FNP		Contract

BSHS provides or arranges for additional services that address patients' and families' palliative and support needs. This includes therapies like physical, occupational, speech, and massage therapy. Medical interventions like infusion therapy and palliative radiation therapy are also available.

CON Action Numbers: 10786 through 10792

BSHS also helps source medical supplies, durable medical equipment, and even funeral services.

As a Medicare-certified hospice, BSHS fulfills two additional requirements:

- 1. Volunteer Integration:** BSHS actively incorporates volunteers into its caregiving approach, as detailed in its application.
- 2. Non-Discrimination Based on Payment:** BSHS cannot discontinue service to a Medicare beneficiary due to its inability to pay. This ensures all patients receive the care they need regardless of financial limitations.

Bristol Hospice – South Florida, LLC (CON application #10789) states that its commitment is to provide high-quality hospice care through a combination of direct staff and contracted services. The applicants mission is to treat patients and families with compassion, respect, and quality care.

- **Compliance:** Bristol is dedicated to meeting all state and Medicare guidelines to become a certified hospice provider.
- **Service Delivery Model:** Bristol proposes a blended service delivery model with:
 - Direct Care: Provided by Bristol's dedicated staff and volunteers (described in "Use of Volunteers" section, not shown here).
 - Contracted Services: Provided by specialized partners.
- **Direct Care Staff (Table 22):**
 - Nursing Professionals: Registered Nurses (full-time and PRN), Nurse Practitioner, and Certified Nursing Assistants.
 - Administrative Staff: Executive Director, Director of Patient Care Services, Business/Clerical staff.
 - Clinical Staff: Licensed Clinical Social Worker, Spiritual Coordinator (Chaplain), Bereavement Coordinator, Hospice Liaison.
 - Medical Director.
- **Contracted Services (Table 22):**
 - Physical Therapy/Occupational Therapy/Speech Therapy (PT/OT/ST)
 - Dietary Counselor
 - Complementary Therapies

Charis Healthcare Holdings, LLC (CON application #10790) outlines the hospice services it will provide directly and those offered under contract with qualified personnel.

Directly Provided Services:

- Registered Nurse
- Licensed Practical/Vocational Nurse
- Medical Social Worker
- Registered Dietary Consultant
- Hospice Aide
- Homemaker
- Volunteers
- Hospice Chaplain
- Bereavement Services
- Physician Services

Services Provided Under Contract:

- Physical Therapist
- Occupational Therapist
- Speech Therapist
- Pharmacy Consultant
- Physician Services

Policy on Contracted Staff: Charis emphasizes senior management's responsibility to ensure contracted staff provide the same level of care and service as its directly employed personnel. All contracted services will be established through formal written agreements before individuals can begin providing services on behalf of Charis.

Moments Hospice of Broward, LLC (CON application #10791), states that, "All hospice services will be provided by Moments Miami staff and Moments Miami volunteers, with the exception of physical, occupational, respiratory, and speech therapy. Moments will contract with these therapists based on patients' needs."

Parkside Hospice and Palliative Care, LLC (CON application #10792) emphasizes a team-based approach to patient care. A dedicated team of professionals, including nurses, social workers, chaplains, dietitians, bereavement specialists, and even music therapists, works together to deliver services tailored to each patient's individualized plan of care. A Clinical Administrator and Medical Director oversee the entire care process.

CON Action Numbers: 10786 through 10792

Routine care is the primary mode of service delivery at Parkside. Inpatient and respite care are used only when a patient's needs escalate.

Parkside offers a comprehensive range of services to meet patients' physical, emotional, and spiritual needs. This includes symptom management (especially pain control), medication management as directed by the patient's physician, medical equipment and therapy services, regular nursing visits, and 24-hour on-call support. Chaplains provide spiritual guidance, social workers offer emotional support, and music therapy is available for those who find it beneficial. Bereavement services are also available to help families cope with loss. Additionally, Parkside can assist with personal care and light housekeeping tasks if needed, and palliative care services are offered to manage pain and symptoms of a serious illness.

Parkside recognizes the valuable role volunteers play in supplementing its staff and enriching the patient experience. The hospice program requires that at least five percent of total patient care hours be provided by volunteers. All volunteers undergo comprehensive training on various topics, including patient rights, preventing abuse and neglect, ethical considerations, communication with terminally ill patients and their families, recognizing signs of approaching death, cultural sensitivities specific to Broward County, and coping with mortality. Once trained, volunteers can provide companionship to patients and families, read to patients, play music, assist with errands, or minor home maintenance tasks, prepare and deliver meals, or help create memory scrapbooks or videos. Parkside categorizes volunteers based on their roles: patient care, bereavement, or office support. The applicant proposes a dedicated Volunteer Coordinator position to manage the volunteer program (details outlined in financial schedules). Refer to Exhibit 3 for the complete Volunteer Policy and Procedures.

In addition to its core staff and volunteers, Parkside collaborates with contracted professionals to provide specialized care when needed. A contracted Medical Director, as outlined in the letters of support (Exhibit 5-2), oversees the overall medical aspects of patient care. Respiratory therapists and physical therapists can also be brought in on a case-by-case basis depending on the patient's specific requirements. Parkside ensures all contracted personnel

CON Action Numbers: 10786 through 10792

receive proper training in hospice care and have a clear understanding of their service expectations. Contracts with these professionals are reviewed annually.

Finally, Parkside works with other organizations within Broward County to address specific patient needs, such as speech therapy, transportation, or medical equipment rentals. These additional services are documented in the patient's plan of care and require approval from the Medical Director.

(g) Proposed arrangements for providing inpatient care.

AMOR Hospice Care, LLC (CON application #10786) does not plan to build its own inpatient care facility currently. Instead, it will seek to contract with existing inpatient hospice facilities within District 10. The applicant argues that this approach represents the most cost-effective way to provide inpatient care services.

- AMOR Hospice highlights its existing connections with multiple inpatient facilities in the area, evidenced by the letters of support included in the application.
- Upon program approval, AMOR Hospice intends to pursue formal contractual agreements with these and potentially other facilities to secure inpatient care beds for their patients.

Arc Hospice of Florida, LLC (CON application #10787) emphasizes that its proposal for the Certificate of Need does not involve constructing a dedicated inpatient hospice facility. Instead, the applicant intends to establish contractual agreements with existing healthcare facilities to meet patient needs. It argues that such contractual arrangements are the most cost-effective solution, as existing hospitals and nursing homes already have the capacity to accommodate the inpatient and respite care needs of hospice patients. Arc highlights existing working relationships with area nursing homes and expresses plans for further development of these partnerships. A letter of support from the Chief Executive Officer of Quantum Healthcare Group, which operates multiple facilities with over 430 beds within the SA, is included in the application (Exhibit G). This letter indicates its willingness to provide general inpatient beds at its long-term care facilities within the SA. Similarly, a letter

CON Action Numbers: 10786 through 10792

from the Administrator of Wilton Manors Health and Rehabilitation Center, also part of Quantum Healthcare Group, expresses its willingness to provide general inpatient beds (Exhibit G).

Arc plans to cultivate additional relationships with local healthcare providers throughout the SA, including hospitals and nursing homes, to expand access for hospice patients. Discussions with other facilities regarding care provision are ongoing. The applicant contends that developing these partnerships and introducing the inpatient hospice option will improve access to care for Broward residents. Furthermore, on Schedule 5 of the application, Arc Hospice projects that 1.5 percent of its total SA 10 patient days will be dedicated to inpatient services. Arc Hospice cites the several letters of support from health care facilities and excerpts:

- Ken Angel, Administrator of Glades West Rehabilitation and Nursing Center, emphasizes the need for comprehensive end-of-life care and highlights the limitations of skilled nursing facilities in providing such care. He believes Arc Hospice would ensure expert medical care, pain management, and emotional support tailored to individual needs. He commends the potential for a comforting and dignified setting, facilitated by close collaboration between the hospice and the nursing facility.
- Barbara Yanez-Artiles, Administrator of Ft. Lauderdale Health and Rehab Center, appreciates Arc Hospice's commitment to patient-centered care and its focus on emotional and spiritual support alongside pain management. She finds value in the specialized programs for specific illnesses and the bereavement and spiritual care programs offered. She emphasizes the importance of integrated care plans, consistent communication, and joint planning for admissions and discharges. Finally, she highlights the educational support Arc Hospice offers to facility staff.
- Shalonda Morton, Administrator of Wilton Manors Health and Rehabilitation Center, expresses concern about communication breakdowns and staffing inconsistencies with existing hospice providers. She finds Arc Hospice's teamwork approach and commitment to consistent staffing appealing. She is impressed by its investment in complementary

CON Action Numbers: 10786 through 10792

therapies, grief support, community education, outreach programs, and specialized programs for veterans. Additionally, she commends its initiative to hire from underserved communities and its plan to develop a cultural liaison program.

- Belkin Munoz, Director of Nursing at Glades West Rehabilitation and Nursing Center, emphasizes the need for specialized hospice services to ensure comfort and dignity for residents. They believe Arc Hospice would provide access to expert medical care, pain management, and emotional support tailored to individual needs. They view collaboration with Arc Hospice as beneficial for improving the quality of life for residents and their families during the end-of-life journey.
- Madeline Nava, Chief Executive Officer of HCA Florida University Hospital, commends Arc Hospice's community outreach and education efforts aimed at improving understanding of hospice services. She believes Arc Hospice's palliative care program would be a valuable asset in assisting with pain and symptom management and reducing unnecessary hospitalizations.

Bonita Springs Healthcare Services, LLC (CON application #10788) plans to provide inpatient hospice care by partnering with existing hospitals and nursing homes in Broward County and cites its experience in securing these relationships. Its approach is

- **Contracting Existing Facilities:** BSHS will not build its own inpatient care facilities. Instead, it will contract with existing providers.
- **Meetings and Assurances:** BSHS has already met with potential partners and secured preliminary agreements to discuss contracts after BSHS receives approval.
- **Multiple Providers Likely:** Due to the size of Broward County, BSHS anticipates contracting with several facilities to ensure geographic accessibility for patients' families.
- **Focus on Patient Accessibility:** BSHS prioritizes choosing inpatient partners that allow for convenient visits from caregivers, families, and friends.

By partnering with established providers, the applicant aims to offer inpatient care without the burden of building new facilities. This approach should streamline its application

process and ensure patient access to inpatient care upon receiving approval.

Bristol Hospice – South Florida, LLC (CON application #10789) outlines its selection criteria and approach to partnering with existing facilities for inpatient hospice care, emphasizing its commitment to quality care and a seamless patient experience.

- **Partner Selection Criteria:** Bristol will select partners based on the following criteria:
 - **Nursing Care:** 24-hour nursing services with a registered nurse on every shift to ensure comprehensive patient care.
 - **Care Plan Adherence:** Commitment to following each patient's individualized plan of care, including treatments, medications, and dietary needs.
 - **Safety and Preparedness:** Implementation of disaster preparedness plans and adherence to health and safety regulations.
 - **Medication Security:** Secure storage and strict accountability for medications, particularly controlled substances, with established protocols for access, documentation, and disposal.
 - **Hospice Philosophy Alignment:** Facilities that embody the hospice philosophy, including:
 - Unlimited and private visitation for patients.
 - Accommodation for patient privacy and personalization of their environment.
 - Facilities for family involvement, including overnight stays.
- **Partnership Agreements:** Written agreements will be established with each partner facility, outlining roles, responsibilities, and care delivery protocols. This ensures clear communication and seamless integration of services while adhering to Bristol's patient care standards.
- **Staff Training:** Bristol plans to provide training for inpatient care personnel to ensure alignment with their hospice care protocols, including procedures for post-mortem care.

CON Action Numbers: 10786 through 10792

- **Admission/Discharge Coordination:** The Bristol team will manage admissions to and discharges from inpatient care. This includes facilitating smooth transitions for patients and families, obtaining necessary physician orders for changes in care level, and communicating with all involved healthcare professionals.

Bristol's Inpatient Services Policy is in the application's Exhibit 4, Policy No. 9029 and samples of inpatient care contracts can be found in Exhibit 5.

Charis Healthcare Holdings, LLC (CON application #10790) states it, "...proposed to provide inpatient care through contractual arrangements with local healthcare facilities."

Moments Hospice of Broward, LLC (CON application #10791) proposes to secure inpatient hospice care for patients in SA 10 through contractual agreements with existing hospitals, nursing homes, and other facilities. Moments Broward highlights the significant level of support for its application, evidenced by letters of support from Broward County hospitals and nursing homes. Its letters of support specifically mentioning Moments' Open Access philosophy and its successful track record of collaboration with similar facilities. The applicant expresses confidence in its ability to establish sufficient contracts to meet inpatient care needs based on the positive response from potential partnering facilities.

Parkside Hospice and Palliative Care, LLC (CON application #10792) proposes to provide inpatient care services through its VITAS contracted 16-bed freestanding facility and plans to expand this facility to accommodate up to 30 beds in the future. Parkside emphasizes its commitment to ensuring sufficient hospice bed availability for Broward County residents.

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

AMOR Hospice Care, LLC (CON application #10786) states above in (g), the applicant is not requesting any new inpatient beds currently.

CON Action Numbers: 10786 through 10792

Arc Hospice of Florida, LLC (CON application #10787) will contract with existing health care facilities for inpatient beds when needed.

Bonita Springs Healthcare Services, LLC (CON application #10788) will contract with existing health care facilities for inpatient beds when needed.

Bristol Hospice – South Florida, LLC (CON application #10789) will partner with existing Medicare and/or Medicaid certified hospitals and skilled nursing facilities to provide inpatient care services.

Charis Healthcare Holdings, LLC (CON application #10790) plans to secure inpatient care agreements within SA 10 following CON approval.

Moments Hospice of Broward, LLC (CON application #10791) is not proposing additional hospice beds and plans to partner with existing hospitals and nursing homes. Letters of support confirm these collaborations. This approach utilizes existing infrastructure, potentially reducing costs and expediting service rollout. While Moments Broward is confident in securing enough partnerships, its success hinges on these contracts and the quality of care ultimately depends on the contracted facilities' standards.

Parkside Hospice and Palliative Care, LLC (CON application #10792) currently has VITAS contracted 16-bed inpatient hospice facility). This facility functions independently and contracts for hospice beds at a negotiated rate. The hospice continues to manage patients' care plans regardless of whether it is in the inpatient facility, a nursing home, or a hospital. Inpatient admissions are typically short-term, used for stabilization or respite care. The care plan remains in effect unless the patient requests a change based on their needs and wishes.

Parkside Hospice plans to dedicate a 16-bed unit and has future expansion plans to accommodate up to 30 beds.

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

AMOR Hospice Care, LLC (CON application #10786)

outlines its approach to inpatient care admission, following CMS, state, and national guidelines.

- **General Inpatient Care:** Inpatient care will be initiated when the interdisciplinary team, including the attending physician and/or Medical Director, determines a patient's pain and symptoms cannot be effectively managed at home or in another residential setting. This could occur due to:
 - Sudden changes after a gradual decline
 - Sudden changes in symptoms or condition
 - Failure of continuous home care to manage patient issues

The decision for general inpatient care is based on the interdisciplinary team's clinical assessment of the need for a higher level of skilled nursing care for effective symptom management.

- **Documentation:** Clear documentation of the need for general inpatient care is essential to inform medical reviewers.
- **Physician Orders:** Industry best practices dictate obtaining a physician's order for a change in care level.
- **Eligibility for General Inpatient Care:** A patient may be eligible for short-term general inpatient care if:
 - The hospice team and caregiver cannot provide necessary skilled care at home.
 - The patient's pain and symptoms cannot be managed by the hospice team at home.
 - There is a need for pain control or symptom management following an acute hospital stay, unfeasible to manage at home upon discharge.
- **Inpatient Respite Care:** Inpatient respite care is for short-term relief of caregivers. While CMS does not provide specific scenarios for respite care, AMOR Hospice will use its discretion to determine the merit of a caregiver's need. Examples may include:
 - Caregiver exhaustion from 24/7 care.
 - Caregiver needs to attend a family event.
 - Caregiver illness requiring a break from caregiving.

CON Action Numbers: 10786 through 10792

AMOR Hospice emphasizes thoughtful consideration of the caregiver's reason for requesting respite care. The interdisciplinary team will review the patient and family situation to ensure appropriate care planning.

Arc Hospice of Florida, LLC (CON application #10787) describes inpatient hospice care as a short-term option for managing symptoms that cannot be effectively controlled at home. Its interdisciplinary team will assess patients receiving inpatient care to determine the ongoing need for this level of service. Inpatient care is also considered appropriate for temporary stays during emergencies where the caregiver cannot provide skilled care at home, such as situations involving sudden illness, disability, or death of the primary caregiver.

Upon receiving approval for the Certificate of Need, Arc Hospice intends to use existing relationships to develop inpatient care options for patients. Wilton Manors Health and Rehabilitation Center has already expressed interest in collaborating with Arc Hospice to provide inpatient services.

The applicant acknowledges that while home care is preferred by most patients, it may not be feasible for all. The need for inpatient hospice care is determined by a patient's medical condition or family circumstances. Typically, such care is required for patients experiencing acute pain or other uncontrollable symptoms in the home setting. Additionally, inpatient hospice services are a crucial option for patients nearing the end-of-life who have complex care needs that cannot be managed at home.

Arc Hospice proposes to offer inpatient care through contractual agreements with existing hospitals, skilled nursing homes, and assisted living facilities within SA 10. This strategy aims to ensure that care options cater to the unique needs of each patient and their family. The applicant highlights that this comprehensive spectrum of inpatient hospice options allows Arc Hospice to provide the most suitable care for a patient throughout their illness journey.

Bonita Springs Healthcare Services, LLC (CON application #10788) highlights the situations where inpatient hospice care is most appropriate. These situations involve complex medical needs that require:

- **Pain Management:** Managing severe or persistent pain that requires ongoing medication adjustments.

CON Action Numbers: 10786 through 10792

- **Mental Status Fluctuations:** Providing care for patients with fluctuating or worsening mental clarity that necessitates medication adjustments.
- **Respiratory Distress:** Assisting patients experiencing severe shortness of breath or difficulty managing their breathing at home.
- **Nausea and Vomiting:** Offering care for patients with persistent nausea and vomiting that cannot be controlled at home.
- **Unstable Medical Conditions:** Providing close monitoring and treatment for patients with unstable or recurring medical conditions.
- **Complex Procedures:** Performing procedures like respiratory or GI suctioning that require specialized equipment or training.

By focusing on inpatient care for these complex situations, BSHS aims to ensure patients receive the intensive medical support they need while still prioritizing comfort and symptom management.

Bristol Hospice – South Florida, LLC (CON application #10789) outlines its criteria for admitting patients to its general inpatient hospice program. Admissions are based on individual needs and a collaborative evaluation process.

- **Medicare, Medicaid, and Private Insurance Standards:** Inpatient care adheres to the standards set by these insurance programs for hospice benefits.
- **Admission Criteria:** Patients must meet at least one of the following clinical criteria to be considered for admission:
 - **Pain Management:** Inability to effectively manage pain in the home setting.
 - **Other Symptoms:**
 - Rapid health decline due to various factors, making home care unsuitable.
 - Fluctuating mental status, psychosis, confusion, or combativeness requiring medication adjustments, environmental changes, or specialist intervention.
 - Severe shortness of breath or respiratory distress creates an unmanageable situation at home.
 - Uncontrolled nausea or vomiting.

CON Action Numbers: 10786 through 10792

- Open wounds requiring frequent professional care (e.g., pressure ulcers, malignant ulcers, burns).
- Other complex care needs (e.g., frequent suctioning, injections, fistula management).
- Need for close monitoring of unstable medical conditions (e.g., bleeding, anemia, hypertension, diabetes, electrolyte imbalances, seizures, fluid buildup).
- Other presenting problems may be evaluated on a case-by-case basis.
- **Psychosocial Issues:**
 - Disturbed mental status requiring intensive monitoring (e.g., hallucinations, paranoia, agitation, combativeness).
 - Severe depression, anxiety, or suicidal ideation.
- **Continued Inpatient Care:** The decision to continue inpatient care is made on a case-by-case basis, considering the interdisciplinary team's evaluation and the attending physician's input. Patients requiring continued inpatient care will not be routinely discharged.

Charis Healthcare Holdings, LLC (CON application

#10790) outlines its approach to inpatient hospice care.

Decisions regarding inpatient admissions will be based on a patient's specific medical condition, the availability of family caregiving support, and the patient's wishes. These include:

- **Respite Care:** Provide temporary relief for caregivers and families.
- **Symptom Management:** Address pain or symptoms that cannot be effectively controlled in a home setting. This is typically a short-term solution (up to five days) to allow for medication adjustments, care plan reassessment, and service refinement. Once stabilized, the goal is to discharge the patient back home.

The applicant emphasizes its capability to provide continuous care, potentially reducing the need for inpatient admissions.

Moments Hospice of Broward, LLC (CON application

#10791) states it will offer inpatient hospice care for Broward patients requiring specific medical interventions. These will be in contracted hospitals or nursing homes and

CON Action Numbers: 10786 through 10792

will be determined by the Moments interdisciplinary team for patients needing pain management and management of acute or chronic symptoms that cannot be effectively managed in other settings (e.g., home care). Traditional Medicare Part A will cover hospitalizations unrelated to a terminal diagnosis. Respite will also be offered on “as needed” basis.

Moments states it has established policies and procedures for inpatient services within its existing operations and it will develop and adhere to similar policies specifically tailored for its Broward operation.

Parkside Hospice and Palliative Care, LLC (CON application #10792) acknowledges that some patients transitioning to home hospice care may require a short-term stay in a general inpatient (GIP) setting. This could be necessary for:

- **Pain management:** If a patient requires pain control beyond what can be provided in another setting after a hospital stay, GIP care might be used.
- **Symptom management:** Similarly, GIP care can address complex symptom management needs that cannot be feasibly managed elsewhere during the transition to home hospice care.

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

AMOR Hospice Care, LLC (CON application #10786) prioritizes keeping patients in their preferred supportive environment throughout their care. Here's how it will address caregiver needs and patient placement:

- **Plan of Care:** Every admitted patient will have a detailed plan of care considering the primary caregiver's availability.
- **Primary Support Person:** Patients are required to identify a family member, caregiver, or legal representative willing to act as a primary support person.
- **Patients Without Identified Caregivers:** For patients who lack an identified caregiver and are independent in daily activities, a social worker will develop a specific plan upon admission. This plan may involve identifying a caregiver through the patient's network.

CON Action Numbers: 10786 through 10792

- **Emergency Respite Care:** AMOR Hospice will offer emergency respite care to patients in need.
- **Assisted Living, Nursing Home, or Hospice House Placement:** If a patient lacks a caregiver, AMOR Hospice may, with the patient's consent, facilitate placement in an assisted living facility, nursing home, or hospice house, as dictated by the patient's care plan.
- **Financial Assistance:** AMOR Hospice will assist patients without a primary caregiver in navigating the application process for Medicare/Medicaid assistance. This includes support in exploring Medicaid spend-down options, which allows individuals to qualify for Medicaid despite exceeding income limits by reducing their income to meet the program's requirements.
- **Guardian Angel Services:** As previously mentioned, AMOR Hospice plans to develop a "Guardian Angel Services" program. This program will consist of trained volunteers who can be called upon to provide presence and support during a patient's final hours, particularly for patients without family support.

Arc Hospice of Florida, LLC (CON application #10787) prioritizes providing hospice care in the least restrictive and most emotionally supportive environment for each patient. This aligns with patient preferences, with many desiring to remain in their homes or with relatives. For patients lacking home support, Arc Hospice proposes to augment care through increased support from staff and volunteers. The interdisciplinary team will collaborate with each patient to develop a plan of care that leverages existing social networks, including friends, family, neighbors, and community members, to facilitate remaining at home.

However, the applicant acknowledges that some patients may be unable to establish a caregiver network or lack the physical or mental capacity for home-based care. In such situations, where a patient cannot care for themselves and has no caregiver support, Arc Hospice may recommend placement in an assisted living facility, nursing home, or inpatient hospice facility. Hospice care would continue to be provided by staff and volunteers in these settings. To achieve this, the applicant plans to establish relationships with various nursing homes, assisted living facilities, and hospitals within the SA.

Bonita Springs Healthcare Services, LLC (CON application #10788) acknowledges that many hospice patients lack primary caregivers at home. To address this, it has developed a policy to ensure all eligible patients receive care, regardless of their living situation.

The applicant states it will serve patients who meet hospice eligibility criteria, irrespective of their living arrangements or ability to pay. Its interdisciplinary team will ensure patients receive safe, high-quality care through appropriate resource allocation. For patients living alone upon admission a social worker will conduct a psychosocial assessment to develop a plan for primary caregiving.

Within 48 hours, the social worker will discuss options with the patient, including a family member or loved one moving in, hiring in-home caregivers, the patient moving in with family/friends or to a skilled nursing facility. The agreed-upon plan will be documented in the Care Plan Form. The applicant states that by implementing this policy, it demonstrates its commitment to providing hospice care to all eligible patients, even those without a traditional home caregiver support system.

Bristol Hospice – South Florida, LLC (CON application #10789) acknowledges the challenges faced by patients without a primary caregiver at home. It outlines a detailed procedure to proactively identify and address the needs of these patients.

- **Focus on Accessibility:** Bristol emphasizes its commitment to ensuring all patients receive necessary care and support, regardless of their situation.
- **Procedure Summary:**
 1. **Initial Assessment:** A Hospice Case Manager (or admitting nurse) evaluates the patient's functional abilities during the initial visit.
 2. **Planning for Care:**
 - If the patient requires assistance and lacks a suitable caregiver, the Case Manager clarifies the patient's existing care plan (if any) and explains Bristol's limitations regarding providing 24/7 care.
 - For patients needing help planning for caregiving, a Hospice Social Worker is involved.

CON Action Numbers: 10786 through 10792

- 3. Social Work Support:** The Social Worker provides information and explores solutions with the patient and family/caregiver to address identified needs.
 - 4. Arranging Additional Assistance:** The Social Worker assists the patient and family/caregiver in planning and securing additional caregiving support.
 - 5. Addressing Refusal or Inability:** If the patient and family/caregiver refuse or are financially unable to accept the proposed caregiving plan, the situation is further discussed.
- **Additional Information:** Details of this procedure are included in Bristol's Availability of Family/Caregiver Policy (Policy No. 1-032) within Exhibit 4.

Charis Healthcare Holdings, LLC (CON application #10790), states that “Upon discovery of a patient who does not have an existing caregiver network, CHARIS will assist in creating that network.”

Moments Hospice of Broward, LLC (CON application #10791) emphasizes its dedication to serving all patients in SA 10, particularly those who lack primary caregivers at home or who are experiencing homelessness. It will achieve this through the Open Access philosophy, which ensures equitable hospice care regardless of a patient's situation. Moment's Open Access philosophy is to not deny care based on factors like caregiver status, homelessness, religious beliefs, financial limitations, or the need for additional comfort measures. Moments will arrange placement for homeless patients and those without caregivers or homes in assisted living facilities or nursing homes.

Parkside Hospice and Palliative Care, LLC (CON application #10792) prioritizes keeping patients living alone in their homes for end-of-life care. Here's how it will achieve this:

- **Family and Friend Involvement:** Parkside Hospice encourages family and friends to participate in the patient's care by creating a shared care schedule and engaging them in activities like music therapy or memory preservation.
- **Volunteer Support:** Trained volunteers can provide additional support to caregivers, allowing patients to remain at home.
- **Relocation to Family Home:** In some cases, Parkside Hospice facilitates moving the patient to a family member's residence for a familiar environment.

CON Action Numbers: 10786 through 10792

- **Respite Care:** Parkside Hospice offers respite care services to give primary caregivers a break, enabling them to continue caring for the patient at home.

(k) Arrangements for the provision of bereavement services.

Pertinent to this rule preference, the Agency notes the following:

- *Section 400.609 (1) (a) Florida Statutes indicates the hospice care team shall directly provide bereavement counseling services*
- *Section 400.609(5) Florida Statutes states this must be a comprehensive program, under professional supervision, that provides a continuum of formal and informal support services to the family for a minimum of one year after the patient's death*

AMOR Hospice Care, LLC (CON application #10786)

states it will offer comprehensive bereavement services to hospice patients' families and caregivers. AMOR Hospice's bereavement program will be designed to support a natural grieving process for families and caregivers. The program will identify individuals who may be experiencing complicated grief requiring more specialized interventions. AMOR will then provide referrals to appropriate resources. The program also aims to equip individuals to function independently after their time with hospice. AMOR Hospice states it will work with families and caregivers to identify and establish support systems. Bereavement services will be available to families and caregivers before and after a patient's death, as outlined in the patient's interdisciplinary care plan. Services may also be extended to staff and residents of assisted living, skilled nursing, and inpatient nursing facilities, as appropriate. AMOR Hospice will collaborate, when applicable, with a patient's spiritual advisor and other community resources deemed helpful for the family or caregiver.

AMOR Hospice states it will provide at least 13 months of bereavement follow-up, delivered by staff and specially trained volunteers experienced in bereavement support and will include mailings and phone calls, educational resources, individual and group counseling sessions, referrals to community resources, crisis intervention counseling, grief support groups and memorial services.

Arc Hospice of Florida, LLC (CON application #10787)

provides a robust bereavement and spiritual care program designed to support patients, families, and the broader community. Its application details a range of services:

- **Multifaceted Bereavement Support:** The application outlines individual and family counseling, grief counseling, and even bereavement support groups. This comprehensive approach ensures patients and families have access to the resources they need throughout the illness and grieving process. The extended follow-up care for thirteen months is a commendable commitment.
- **Individualized Spiritual Care:** Arc Hospice employs chaplains and spiritual care providers who cater to patients' specific religious and spiritual needs. This personalized approach ensures patients receive the spiritual support that aligns with their beliefs. The outreach efforts to establish partnerships with faith-based communities, particularly within the African American community, demonstrate a commitment to cultural sensitivity.
- **Holistic Support:** The application highlights support groups designed for caregivers, acknowledging the emotional toll caregiving can take. This program provides a valuable resource for caregivers' well-being.
- **Palliative Arts Therapies:** The use of music therapy, pet therapy, massage therapy, and other complementary therapies showcases Arc Hospice's focus on patient-centered care and symptom management beyond traditional methods.

The inclusion of an annual Bereavement Symposium aimed at local clergy and professionals further strengthens Arc Hospice's application. This initiative highlights its commitment to education and ensuring a wider support network for those experiencing grief.

Bonita Springs Healthcare Services, LLC (CON

application #10788) offers comprehensive bereavement services that extend beyond the one-year minimum required by Medicare. The include

- Individual and Family Grief Support
- Telephone support
- Support groups
- Individual counseling
- Specialized Support Groups:

CON Action Numbers: 10786 through 10792

- Teenagers
- School Support Groups
- Memorial Services
- Coping with Grief During Holidays Program
- Community Outreach/Education on Grief
- Yoga for Grieving Hearts Sessions
- Family Weekend Bereavement Retreat
- Children's Bereavement Camps (Ages 6-17)

The applicant states it will offer bereavement services for up to 18 months, exceeding the Medicare requirement. Specially trained staff will provide bereavement services, including grief support groups, community outreach, and collaborating with patients and families and it will have volunteers to support the bereavement program.

Bristol Hospice – South Florida, LLC (CON application #10789) outlines its bereavement program designed to support families and caregivers following a patient's death. The program is available for up to one year after the patient's passing and is supervised by a qualified Bereavement Coordinator.

- **Program Staff:** Bereavement services will be delivered by trained and experienced personnel equipped to address grief.
- **Program Services:**
 - Offered to families and caregivers of hospice patients before and after the patient's death.
 - **Designed to:**
 - Facilitate a healthy grieving process.
 - Identify and refer individuals experiencing complicated grief requiring further support.
 - Prepare individuals to function independently after hospice care and develop a support system.
- **Bereavement Assessment:** A social worker conducts a bereavement risk assessment upon hospice admission. Bristol's bereavement plan is then tailored based on this initial assessment, ongoing patient and family needs, and a comprehensive assessment at the time of death.
- **Collaboration:** Whenever possible, Bristol coordinates bereavement services with the patient's clergy and other relevant community resources to best assist families and caregivers.

CON Action Numbers: 10786 through 10792

Details on Bristol's Bereavement Services Policy (Policy No. 9-023) and Bereavement Assessment Policy (Policy No. 1-021) are provided in Exhibit 4.

Charis Healthcare Holdings, LLC (CON application #10790) proposes a structured bereavement program led by a qualified Bereavement Coordinator. This program will offer services to families and caregivers of hospice patients for up to one year following the patient's death. Bereavement counselors involved in the program will be trained and experienced in grief management. Job descriptions will clearly outline the duties and responsibilities of the Bereavement Coordinator and counselors.

The applicant states bereavement services will be available to families and caregivers of hospice patients both before and after the patient's death, aligned with the established plan of care. CHARIS will extend bereavement services to families and caregivers of residents in skilled nursing facilities (SNFs) and inpatient rehabilitation centers (ICRs), when appropriate. Charis states its bereavement programs will facilitate a healthy grieving process, identify and refer individuals experiencing complicated grief reactions that may impede their ability to cope with loss, prepare individuals to function independently after hospice services conclude and assist individuals in identifying a support system.

CHARIS intends to coordinate bereavement services, whenever possible, with the patient's clergy and other community resources deemed beneficial to the families and caregivers.

Moments Hospice of Broward, LLC (CON application #10791) emphasizes creating personalized bereavement plans based on each loved one's needs. These plans can extend up to 24 months after a patient's death. Moment's bereavement program begins with an initial risk assessment at admission, which helps tailor support throughout the grieving process. After the death, the bereavement coordinator works with the care team to understand the situation and create a plan. This plan typically includes ongoing contact via phone calls, visits, and invitations to support groups and special events. Moments will offer a variety of support groups, including weekly sessions facilitated by a rabbi and a social worker. It also plans to collaborate with the Children's Bereavement Center (CBC) to

CON Action Numbers: 10786 through 10792

offer additional options for bereaved families and community members.

Moments acknowledges the need for community education on grief and loss and states plans to donate to the CBC to support their existing services, offer a local in-person support group open to the community, host an annual Grief Discovery Workshop with various activities to help people explore different coping mechanisms, organize butterfly memorial ceremonies several times a year and provide support for children experiencing grief through partnerships with the CBC and by offering children's grief backpacks.

Parkside Hospice and Palliative Care, LLC (CON application #10792) states it will offer bereavement services to families and caregivers of deceased patients for thirteen months. These services aim to facilitate a healthy grieving process and identify individuals who may require further support beyond hospice services.

A Bereavement Coordinator oversees the program. Staff providing services have grief counseling experience supporting grieving individuals. The hospice collaborates with the patient's clergy, if applicable. A bereavement risk assessment is conducted upon patient admission and incorporated into the care plan. In some cases, a bereavement counselor may proactively contact families before the patient's death. Bereavement services are tailored to the preferences of the family/caregiver.

Parkside Hospice offers various support options, including informational resources through the "Hope Through Healing" program, support groups, and individual grief counseling. Trained volunteers may also provide bereavement support.

The applicant refers to a Bereavement Policy and Procedures document included in a separate exhibit, which could be found.

(1) Proposed community education activities concerning hospice programs.

AMOR Hospice Care, LLC (CON application #10786) proposes a comprehensive community outreach program, as evidenced by the endorsement from Oyedepo A. Oyetoro, Executive Director of Nspire Healthcare Lauderhill: "AMOR

CON Action Numbers: 10786 through 10792

Hospice demonstrates a strong dedication to collaboration and community engagement... Their proactive outreach efforts will undoubtedly enhance the continuum of care." The applicant notes the lower hospice utilization rates in the Black, Hispanic, Native American, and Asian communities compared to the white population. AMOR states misconceptions about hospice services and benefits are prevalent within these minority communities.

AMOR Hospice aims to bridge the gap through targeted outreach initiatives by assessing community needs and partnering with trusted community leaders to disseminate accurate information, developing educational materials in various languages, "trans created" to resonate with diverse cultural backgrounds. The applicant also will have bilingual staff and a dedicated bilingual program coordinator to enhance communication and program delivery. AMOR states it will utilize various strategies like workshops, a mobile outreach van, faith-based partnerships, and social media campaigns.

Arc Hospice of Florida, LLC (CON application #10787)

argues that increased education and training for healthcare professionals and referral sources is essential to improve access to hospice care in the SA. It plans to implement a multifaceted educational program targeting physicians, nurses, and other patient referral sources.

The program will cover various topics including:

- Death, dying, and bereavement
- Overview of hospice care
- Hospice eligibility requirements
- Advance care planning
- Pain management
- Symptom management
- Caregiver support

Arc Hospice acknowledges that many referral sources are unfamiliar with hospice care for non-cancer diagnoses. It aims to address this gap by providing educational materials and tools to help healthcare professionals determine when a hospice is appropriate for both cancer and non-cancer patients.

Partnership with Nova Southeastern University (NSU):

Arc Hospice proposes a partnership with NSU to develop a coordinated educational curriculum related to hospice and provide high-quality field placement opportunities for NSU's healthcare professions students. This collaboration will benefit both parties by:

- **Benefits for NSU:**
 - Clinical rotations for students in healthcare programs.
 - Collaboration on developing specialized training programs.
 - Opportunities for research and clinical trials.
 - Networking and career development for students.
 - Community outreach and education initiatives.
- **Benefits for Arc Hospice:**
 - Access to skilled and motivated student interns.
 - Research collaborations.
 - Continuous professional development for staff.
 - Increased access to qualified care teams.
 - Opportunities for advanced care planning and family support.

Arc Hospice is committed to collaborating with NSU and will provide \$20,000 annually for the first five years to support the educational program. A letter of support from NSU's Vice President for Operations, Health Professions Division is included in the application (Exhibit H).

Arc Hospice's application has garnered significant backing from a range of community leaders and healthcare professionals. Seven letters of support for this section were submitted, with contributors including:

- Academic leaders from Nova Southeastern University (NSU), including the Dean of the College of Nursing, Chair of the Department of Geriatrics, and Chair of the Department of Rural and Urban Underserved Medicine.
- Healthcare providers such as a Chief Executive Officer of a local hospital and a board-certified physician specializing in geriatrics.
- Religious leaders representing a local ministry with experience serving first responders.
- An attorney with prior experience working with a Continuing Care Retirement Community.

CON Action Numbers: 10786 through 10792

These letters collectively endorse Arc Hospice's qualifications to serve the community and address a critical need for increased access to hospice care.

Bonita Springs Healthcare Services, LLC (CON application #10788) recognizes that hospice care can be underutilized by certain groups. To address this, BSHS plans to launch a comprehensive educational program focused on increasing awareness and access to hospice services. Bonita Springs will target educational efforts towards underserved communities, including:

- Minority groups (African Americans, Hispanics, Muslims, Hindus)
- People lacking social support systems (homeless, veterans, recently incarcerated individuals)
- Residents with limited access to healthcare (rural areas, those without regular physicians)

Multi-pronged educational initiatives will include - BSHS providing at least two educational programs annually to raise awareness about hospice services within these target communities. Further, BSHS will educate potential patients about 'When hospice is appropriate', how to access general healthcare and how to access hospice care. BSHS will focus on improving healthcare professionals' understanding of hospice through staff internal to enhance their ability to guide patients towards hospice. The applicant will collaborate with universities and colleges to develop educational programs for healthcare professionals. BSHS will provide continuing education workshops and presentations for physicians, covering topics like 'The evolving role of hospice care', 'Patient preferences for end-of-life care' and 'The benefits of hospice care for patients and families'.

BSHS will also utilize traditional outreach methods such as educational meetings for senior citizen groups, presentations at assisted living facilities, shelters, food banks, faith-based organizations, veterans' groups, and nursing homes and participating in health fairs. The applicant concludes that by combining targeted education with traditional outreach, BSHS aims to empower patients, families, and healthcare professionals to make informed decisions about hospice care. Its extensive experience will be an asset in developing and implementing these educational programs.

Bristol Hospice – South Florida, LLC (CON application #10789) emphasizes its commitment to community engagement and patient education. It believes these efforts are crucial to raising awareness about hospice and ensuring its services are accessible.

- **Community Relationship Development:** Bristol prioritizes building strong relationships with healthcare providers, patient advocacy groups, and local organizations. This collaboration aims to foster a broad understanding of hospice benefits and the specific services Bristol offers.
- **Education on Medicare Hospice:** A significant focus of Bristol's outreach is educating the community regarding Medicare hospice eligibility requirements and the range of services available. It aims to ensure patients and families are well-informed about their options.
- **Presentations:** Bristol offers educational presentations to healthcare professionals and community groups. These sessions cover hospice philosophy, program requirements, and the process of receiving hospice care.
- **Streamlining Referrals:** Bristol prioritizes a smooth and timely referral process for both healthcare providers and patients. It aims to make transitioning to hospice care as comfortable as possible.
- **Responsive Support:** Bristol highlights its commitment to rapid and effective responses to inquiries from both existing patients and the broader community. It emphasizes its dedication to addressing concerns, providing information, and supporting informed decision-making about hospice care.

Charis Healthcare Holdings, LLC (CON application #10790) acknowledges the significance of fostering strong relationships with the SA's residents, organizations, and healthcare providers. Its strategy involves frequent meetings with various local hospitals, nursing homes, assisted living facilities (ALFs), physicians, and community organizations. Charis aims to become a trusted resource for end-of-life care inquiries from area providers and social service organizations.

As previously mentioned, upon receiving authorization to serve SA 10, Charis plans to launch numerous outreach and educational events within the community.

Moments Hospice of Broward, LLC (CON application #10791) acknowledges the importance of building SA relationships with residents and organizations. It emphasizes its experience in developing educational programs tailored to community needs in other service areas. Planned educational initiatives will include:

- **Mobile Education Vehicle:** Moments plans to deploy an education vehicle within three months of receiving accreditation. This vehicle, modeled after a successful program in SA 11, will travel throughout SA 10 providing information and resources on hospice services.
- **Community Training Programs:** Moments will offer regular educational events focusing on specific conditions, including:
 - Cardiac Disease (CHIRP and Heart Program)
 - Pulmonary Disease (EXPAND and Breathe Program)
 - Alzheimer's Disease (MIND and Respect Program) - including information on the Namaste Care program
- **Educational Materials:** Moments has developed printed materials in English and Spanish that address various hospice-related topics. These materials will be available at educational events and distributed through the mobile education vehicle. The brochures cover topics such as:
 - Basic hospice eligibility
 - Moments' Circle of Care approach (including a Spanish language version)
 - Specific programs offered by Moments, such as music therapy.

Moments Broward recognizes the prevalence of community clinics in SA 10 and its role in serving Medicare beneficiaries. It plans to collaborate with these clinics by hosting quarterly educational events on hospice care for clinic staff, patients, and families.

In addition to this focus on senior clinics, Moments dedicated hospice care consultants will receive specialized training in - Moments Veterans programs, National Institute of Jewish Hospice (NIJH) accreditation standards and culturally competent care for racial and ethnic minorities. Moments believes this comprehensive approach will allow its HCCs to effectively reach out to and serve underserved populations within SA 10.

Parkside Hospice and Palliative Care, LLC (CON application #10792) offers bereavement services, including annual Celebrations of Life events. These ceremonies allow friends and family to gather and commemorate the life of a deceased loved one. The Bereavement Coordinator collaborates with families to personalize each Celebration of Life experience. Ceremonies may feature memory tables showcasing the deceased's hobbies, achievements, or passions. Attendees are offered small wooden hearts to inscribe with the deceased's name. During the ceremony, hospice staff and attendees can share memories and stories about the deceased. The inscribed wooden hearts are collected and displayed in a shadow box.

(m) Fundraising activities.

AMOR Hospice Care, LLC (CON application #10786) makes a commitment to not seek fundraising from the community, ensuring the new program does not compete with existing providers for funds.

Arc Hospice of Florida, LLC (CON application #10787) will partner with its parent company's foundation to coordinate fundraising efforts within the SA. The foundation will raise and manage charitable contributions to support Arc Hospice's mission and various patient and family care services. These donations will enable Arc Hospice to offer a comprehensive range of interdisciplinary and volunteer services, ultimately improving the experience for patients and families facing end-of-life needs.

Bonita Springs Healthcare Services, LLC (CON application #10788) is committed to improving the well-being of the community through its non-profit outreach programs. BSHS prioritizes programs that directly address the comfort and health needs of underserved community members with limited financial resources.

BSHS acknowledges existing non-profit hospices and doesn't intend to compete for donations. It recognizes that donations are crucial for these organizations to expand services such as:

- Continuing education for healthcare professionals
- Grief support groups for various age groups
- Children's Grief Camps
- Reminiscence groups for memory support

CON Action Numbers: 10786 through 10792

- Research on improving healthcare delivery systems
- End-of-life care for patients facing financial hardship

BSHS aims to complement existing services by focusing on outreach and education within underserved communities. This collaborative approach can improve overall community well-being.

Bristol Hospice – South Florida, LLC (CON application #10789) introduces the Bristol Foundation, a 501(c)(3) non-profit organization dedicated to improving hospice care accessibility and quality. The Foundation fulfills its mission through education, financial assistance, and community outreach, following the acronym CARE:

- **Communicate:** Raising awareness about hospice care benefits and its role in end-of-life care.
- **Assist:** Providing financial aid to patients facing financial barriers to hospice care.
- **Reach:** Promoting and expanding the availability of hospice care services.
- **Educate:** Enhancing knowledge about hospice care among both healthcare professionals and the general public.

To achieve its goals, the Bristol Foundation offers various programs:

- **Educational Programs:** Activities and informational sessions focused on hospice care.
- **Community Support:** Providing aid and support for events relevant to the communities served.
- **Burial/Benefits:** Assisting families who cannot afford burial services.
- **Financial Assistance:** Helping patients facing financial hardship cover hospice care costs.

The applicant states The Bristol Foundation has provided more than \$300,000 in support to 371 families over the last two years. This assistance includes funds for burials and cremations, travel expenses, and other necessities related to fulfilling end-of-life wishes.

Charis Healthcare Holdings, LLC (CON application #10790) intends to manage its own fundraising efforts within SA 10. Donations will be used to support a broad range of interdisciplinary services and volunteer opportunities for hospice patients and their families. These

CON Action Numbers: 10786 through 10792

resources will be reinvested into the local community by providing palliative and hospice care, training and assistance for caregivers, community awareness programs, support services for families and grief counseling services.

Moments Hospice of Broward, LLC (CON application #10791) states it will not actively solicit charitable donations or engage in fundraising activities. Any unsolicited donations received will be directed to the Moments Hospice Foundation, a non-profit organization. The foundation uses funds to support local organizations and families and will ensure all contributions received in SA 10 are reinvested in the local community.

Moments states that Moments Miami has consistently donated funds, with a significant portion directed towards Miami-Dade and Monroe Counties. The applicant notes its record of charitable giving in SA 11 surpasses the commitments outlined in its original CON application for that area. Moments concludes that its commitments will be strategically designed to provide meaningful support to SA 10's terminally ill patients, their families, and related organizations.

Parkside Hospice and Palliative Care, LLC (CON application #10792) cites the Parkside Hospice Care Foundation (PHCF), a non-profit organization affiliated with Parkside Healthcare. PHCF's mission is to provide financial and emotional support to families in Broward County experiencing the loss of a loved one. The foundation is stated to offer grief support services to the community, educate the community on end-of-life care resources and the benefits of hospice and supports grieving families. Donations to PHCF can be made through memorial donations, honorary donations, bequests, or cash contributions.

- c. 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.**

All applicants except Charis directly respond stating compliance with this reporting requirement. All applicants completed Schedule D-1 (Item H.) of which certifies it will provide utilization reports.

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) and (2), Florida Statutes.**

As previously stated in item E.1.a. of this report, per Volume 50, Number 23, of the Florida Administrative Register, dated February 2, 2024, need was published for a hospice program Service Area 10 (Broward County) for the July 2025 hospice planning horizon.

Broward County has 23 hospitals with 6,792 licensed beds, 32 SNFs with 4,382 beds, 251 ALFs with 9,707 licensed beds, and 286 home health agencies.

All applicants discussed the need for the projects in response to Item E. 1. of this report.

Agency records indicate that for the three-year period ending April 23, 2024, Bristol Hospice – South Florida, LLC, nor Moments Hospice of Broward, LLC had no substantiated complaints.

- b. Does the applicant have a history of providing quality of care? Has the applicant demonstrated the ability to provide quality care? ss. 408.035 (3), Florida Statutes.**

AMOR Hospice Care, LLC (CON application #10786), a new organization, prioritizes states its commitment is evident in its pursuit of CHAP accreditation and investments in key areas.

- **Quality Metrics:** The applicant plans to achieve CHAP accreditation (allocating \$10,000) and ensure comprehensive care through minimum visit quotas for home health aides and RNs, along with timely response to referrals and focus on end-of-life care.
- **Unique Programs:** AMOR Hospice will develop a "Guardian Angel" volunteer program for companionship during final hours and offer pet therapy, massage & reiki therapy, and music therapy with a "Legacy Program" component.
- **Culturally Competent Care:** Recognizing the diverse community, AMOR Hospice is committed to a bilingual staff (Spanish dialects and Haitian-Creole emphasized) with \$20,000 allocated for signing bonuses. All staff will receive cultural competency training through the Cross Cultural Health Care Program (\$10,000 per year for two years). Additionally, it plans to pursue specialized certifications for veteran and LGBTQ+ care.

CON Action Numbers: 10786 through 10792

Jesus Tundidor, Council President for the City of Hialeah, applauds the leadership's focus on patient care, highlighting their experience and the quality services AMOR has provided in the past.

AMOR Hospice's focus on quality, cultural competency, and unique programs positions them to effectively serve Broward County's diverse population.

Arc Hospice of Florida, LLC (CON application #10787) emphasizes its commitment to quality and continuous improvement through a Quality Assurance Performance Improvement (QAPI) program. Here's a breakdown of the key points:

- **Commitment to Improvement:** Arc Hospice highlights its dedication to creating a work environment where problems are openly addressed, and service improvement is encouraged.
- **Resource Allocation and Utilization:** It monitors resource allocation to ensure optimal care that aligns with patient and family needs. This includes reviewing appropriateness of services, patient admissions, length of stay, delays in services, and specific treatment modalities.
- **Quality Assurance Performance Improvement (QAPI) Program:** Arc Hospice will establish a QAPI program to systematically evaluate the quality of care provided. This program will:
 - Be interdisciplinary, involving various staff members.
 - Focus on infrastructure to make quality improvement routine.
 - Emphasize patient rights, family needs, and customer satisfaction.
 - Comprise a multifaceted program with ongoing evaluation of structural, process, and measurable outcome criteria.
 - Ensure compliance with internal and external standards for cost-effective services.
- **The applicant will establish a QAPI Committee** to oversee QAPI activities, including:
 - Representatives from administration, clinical services, medical director, compliance, skilled and unskilled disciplines.
 - Monthly meetings to review data, monitor program progress, and track performance improvement plans (PIPs).
 - Responsibilities to prioritize improvement areas, maintain confidentiality, track adverse events, and keep staff informed.
- **Focus on Improvement:** Arc Hospice aims to achieve high-value, effective, and efficient services through QAPI activities. This includes:

CON Action Numbers: 10786 through 10792

- Establishing a systematic mechanism to measure and assess quality care using elements like appropriateness, dignity, efficiency, effectiveness, timeliness, safety, continuity, and availability of care.
- Identifying areas for improvement in patient care, processes, outcomes, and hospice operations.
- Implementing ongoing measures to improve patient care, processes, outcomes, and hospice operations.
- Prioritizing improvement opportunities with the greatest impact on patient outcomes, operations, and customer satisfaction.
- Monitoring high-risk, high-volume, or problem-prone areas of care and services.
- Tracking adverse events, analyzing causes, and implementing preventive actions.
- Taking actions to improve performance, patient safety, and quality of care.
- Ensuring coordination and integration of all performance improvement activities.
- Comparing performance with similar organizations nationally.
- Identifying ongoing educational needs for staff.
- Assigning personnel, time, and information systems to support QAPI activities.
- Participating in the community to improve access and continuity of care.
- Sustaining improved performance.
- **Self-Assessment:** The QAPI Committee will conduct an ongoing self-assessment of the quality and appropriateness of care provided. This includes:
 - Analyzing a representative sample of services provided to patients.
 - Analyzing client complaint and satisfaction survey data.
 - Conducting annual evaluations of the total operation, including contracted services.

Bonita Springs Healthcare Services, LLC (CON application #10788) prioritizes quality care delivery through a multi-pronged approach that emphasizes exceeding regulatory standards.

- **Mission and Values:** BSHS underscores its mission of providing compassionate care and exceptional service. The applicant's management philosophy prioritizes quality and customer service, ensuring these values permeate all aspects of care delivery.
- **Experienced Personnel:** BSHS highlights the qualifications of key personnel through brief biographies, demonstrating its expertise in delivering quality hospice care.

CON Action Numbers: 10786 through 10792

- **Quality Initiatives:** BSHS outlines its commitment to quality through a comprehensive set of initiatives:
 - Staff are encouraged to pursue certifications in hospice and palliative care.
 - Regular physician visits are complemented by 24/7 access to nurses.
 - Weekend visits by nurses, chaplains, and social workers ensure continuity of care for patients in long-term care facilities.
 - Bereavement specialists offer dedicated support to families.
 - Culturally sensitive programs and multilingual staff with access to translation services cater to diverse patient needs.
 - A robust Quality Assurance Program focuses on continuous improvement.

BSHS states it will exceed minimum standards by implementing a more ambitious pain reduction target of 80 percent within 48 hours, compared to the state standard of 50 percent within 96 hours. Developing culturally sensitive programs specifically designed for the SA's underserved populations, utilizing telehealth/telehealth resources and electronic medical records to enhance care coordination and symptom management, and requiring higher educational qualifications for chaplains (Master of Divinity or equivalent) and social workers (master's degree or licensed clinical social worker).

BSHS emphasizes its commitment to seeking accreditation within two years of licensure, demonstrating a strong desire to meet the highest industry standards. BSHS details its Quality Improvement (QI) program's objectives:

- Identifying areas for improvement in patient care.
- Ensuring care aligns with patient needs.
- Revising procedures to achieve the highest quality standards.
- Utilizing staff expertise for data collection and sharing best practices.

Bristol Hospice – South Florida, LLC (CON application #10789)

emphasizes its dedication to providing high-quality hospice care with a focus on meeting patients' needs for skilled services.

- Bristol outlines its plan to ensure patients receive an individualized plan of care, including:
 - 5 to 7 home health aide visits per week
 - A minimum of two registered nurse (RN) visits per week
 - Adjustments based on each patient's specific needs
- To support its claim of providing high-quality care, Bristol presents data from Medicare's Post-Acute Care and Hospice Public Use Files (PAC PUF). This data demonstrates that Bristol's national

CON Action Numbers: 10786 through 10792

operations deliver a higher-than-average number of skilled nursing visits per beneficiary compared to both Florida and national averages during the years 2020-2021 (Tables 23).

- Bristol also references quality measures captured in the Hospice Item Set (HIS) and reports exceeding national and state averages in all eight measured categories (Table 24).
- Family caregiver experience is addressed through Medicare's CAHPS measures. While Bristol outperformed the state average in six out of eight categories for its Miami-Dade program, it did not outperform the state average in getting timely help (Table 25).
- Finally, Bristol highlights its performance on the new Hospice Care Index (HCI) developed by CMS. It reports exceeding both national and state averages in this measure for overall hospice care quality (Table 26).

The applicant also states it will seek Accreditation by Community Health Accreditation Program (CHAP) is cited as a demonstration of Bristol's commitment to high standards. Bristol also references its Quality Assessment Performance Improvement (QAPI) plan as evidence of its dedication to continuous improvement (details in Exhibit 9). Bristol includes positive social media reviews and testimonials to showcase patient and family satisfaction with its care.

Charis Healthcare Holdings, LLC (CON application #10790)

emphasizes its commitment to quality and service efficiency. It outlines a program for continuous review and improvement, including a leadership team that encourages staff suggestions. Additionally, Charis has established policies to address identified problems in hospice service delivery. The applicant highlights its experience in providing quality care as a hospice provider, skilled nursing registry, and home health agency across the nation.

- Private Duty Nursing Registries in Broward County

Moments Hospice of Broward, LLC (CON application #10791)

emphasizes its commitment to quality care, citing the experience of its parent organization, Moments Hospice.

Moments Hospice Quality Assurance

- All Moments agencies are accredited by the Community Health Accreditation Partner (CHAP).
- Moments has a history of high marks on state and CHAP surveys, demonstrating a focus on compliance and exceeding quality standards.
- No Moments facility or patient home has ever received a negative CMS or state complaint survey.

CON Action Numbers: 10786 through 10792

- Moments employs Quality Review and Education nurses to ensure quality care through documentation review, staff education, and ongoing performance improvement initiatives.

Moments Hospice outlines its QAPI program, a data-driven, SA-wide initiative focused on continuous improvement in quality of care. Key aspects include:

- **Proactive Approach:** The program emphasizes identifying and addressing potential problems before it impacts patient care in SA 10.
- **Performance Improvement Projects (PIPs):** Specific plans are developed to address identified areas for improvement within SA 10. These plans involve data collection, goal setting, implementation strategies, and measurement of progress.
- **Ongoing Monitoring and Evaluation:** Regular data analysis, audits, and review of PIPs ensure the program remains effective in SA 10.
- **Staff Involvement:** All staff members participate in the QAPI program through various means, including identifying potential issues, attending training sessions, and implementing quality improvement initiatives within SA 10.
- **Focus on Patient Care:** The goal of the QAPI program is to ensure high quality patient and family care, with positive impacts on patient health, safety, and palliative outcomes in SA 10. Moments also cites additional measures it utilizes to ensure quality care:
- **SHP Data and Analytics:** Moments uses Strategic Healthcare Programs (SHP) to collect and analyze performance improvement data, allowing them to benchmark its performance against state and national averages. SHP also gathers feedback through the Consumer Assessment of Healthcare Providers Survey (CAHPS) to gain insights from patients' families in SA 10.
- **Home Visits:** Supervisory staff conduct home visits with clinicians to monitor care delivery and identify areas for improvement in SA 10.
- **Governing Body Oversight:** The Moments Hospice Governing Body maintains oversight of the QAPI program, including approving the program, appointing a program manager, and receiving regular updates on program activities (also to apply in SA 10).

Parkside Hospice and Palliative Care, LLC (CON application #10792) prioritizes quality care in its application to serve Broward County. Its commitment is reflected in [its](#) pursuit of accreditation from CHAP, memberships in NHPCO and FHPCA for ongoing education, and adherence to CMS reporting requirements.

CON Action Numbers: 10786 through 10792

Parkside's core values translate into high-quality care. It emphasizes ethical conduct, patient rights, clinical excellence with a focus on safety, inclusion, and access to care for all, a culture of quality and accountability, and a skilled, collaborative workforce.

Parkside aligns with the National Hospice and Palliative Care Organization's (NHPCO) ten quality components, ensuring patient and family-centered care, ethical behavior, clinical excellence, access for diverse populations, organizational excellence, workforce excellence, adherence to standards and regulations, strong stewardship, and continuous improvement through performance measurement.

Parkside utilizes two key CMS-mandated quality measurement methods: the Hospice Item Set (HIS) tracking pain management and other vital aspects of care, and the Consumer Assessment of Healthcare Providers and Systems (CAHPS) surveying caregivers' experiences.

A dedicated Quality Assessment and Performance Improvement (QAPI) committee focuses on identifying and resolving quality issues, evaluating care quality, assessing the impact of interventions, and recommending improvements in patient and family care. This committee also considers input from the Patient and Family Advisory Council to ensure accessibility for all.

Parkside Hospice's commitment to quality care, from accreditation and adherence to standards to a structured improvement process, positions them well to deliver exceptional hospice services in Broward County. Its focus on patient and family needs, ethical conduct, and ongoing performance measurement ensures a high standard of care.

Parkside states it will offer specialized programs like the SAGE Initiative, which caters to patients with dementia/Alzheimer's, providing unique tools and support for both patients and families. Its Veteran's Initiative tackles the specific needs of veterans facing terminal illness, with skilled social workers collaborating with community resources to assist homeless veterans and manage socioeconomic challenges. Additionally, the non-billable Palliative Care Program offers support and symptom management to seriously ill patients not yet ready for hospice, aiming to improve quality of life and prevent hospital readmissions.

Parkside has built a strong network within Broward County. Collaborations with hospitals like Woodmont, Aventura Hospital, Memorial Regional, and Broward Medical Center ensure a smooth transition for patients entering hospice care. Partnerships with major insurance providers like UHC, Aetna, Humana, and Medicare make its

services accessible to a wider range of patients. Furthermore, Parkside emphasizes providing care at home whenever possible, aligning with its philosophy of "aging in place."

Parkside's commitment to quality care is evident in its high staff ratings, reflecting the skill and expertise of its clinical staff. It also benchmarks competitively with other hospices in areas like re-hospitalization rates, Medical Examiner investigations, and appropriate opioid use for pain management. The applicant cites its accreditations from CHAP (Community Health Accreditation Program) and Joint Commission demonstrate adherence to rigorous quality standards. Parkside actively participates in organizations like NHPCO (National Hospice and Palliative Care Organization) and Florida Health, ensuring its staff remains up-to-date on changing regulations and best practices.

- c. What resources, including health manpower, management personnel and funds for capital and operating expenditures, are available for project accomplishment and operation? ss. 408.035 (4), Florida Statutes.**

Applies to all applicants:

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.

AMOR Hospice Care, LLC (CON application #10786): The applicant is a developmental stage entity and has \$1,019,912 in cash but no operations.

CON Action Numbers: 10786 through 10792

Capital Requirements and Funding:

On Schedule 2, the applicant indicates capital projects totaling \$542,017, which includes this project (\$517,017) and capital expenditures (\$25,000). The applicant indicates on Schedule 3 of its application that funding for the project will be by cash on hand. With \$1,019,912 in cash and cash equivalents, the applicant has sufficient resources to fund this project and all capital expenditures.

Arc Hospice of Florida, LLC (CON application #10787): The applicant is a developmental stage entity and has \$10,000 in cash but no operations.

Capital Requirements and Funding:

On Schedule 2, the applicant indicates capital projects totaling \$1,585,845, which includes this project (\$373,370), and other CONs (\$1,212,475). The applicant indicates on Schedule 3 of its application that funding for the project will be by related company financing. The applicant submitted a letter from Flagstar Bank indicating Tunic Capital (an affiliate) has excess of \$2,500,000. With \$2,500,000 in cash, the applicant has sufficient resources to fund this project and all capital expenditures.

Conclusion:

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

Bonita Springs Healthcare Services, LLC (CON application #10788): The applicant is a developmental stage entity and has \$400,685 in cash but no operations.

Capital Requirements and Funding:

On Schedule 2, the applicant indicates capital projects totaling \$486,449, which includes this project (\$436,449) and capital expenditures (\$50,000). The applicant indicates on Schedule 3 of its application that funding for the project will be by cash on hand (\$400,000), and operating cash flows (\$100,000). With \$486,449 in cash and cash equivalents, the applicant does not have sufficient resources to fund this project and all capital expenditures.

Conclusion:

Funding for this project and the entire capital budget is in question.

CON Action Numbers: 10786 through 10792

Bristol Hospice – South Florida, LLC (CON application #10789)

10789 - Bristol Ultimate Holdco, LP & Combined Affiliate		
	Dec-22	Dec-21
Current Assets	\$116,455,518	\$106,120,139
Total Assets	\$519,990,637	\$527,324,095
Current Liabilities	\$53,843,931	\$54,611,067
Total Liabilities	\$435,917,683	\$386,558,439
Net Assets	\$84,072,954	\$140,765,656
Total Revenues	\$385,205,825	\$352,755,572
Excess of Revenues Over Expenses	(\$38,562,059)	(\$14,456,794)
Cash Flow from Operations	(\$44,741,531)	\$4,277,028
Short-Term Analysis		
Current Ratio (CA/CL)	2.2	1.9
Cash Flow to Current Liabilities (CFO/CL)	-83.09%	7.83%
Long-Term Analysis		
Long-Term Debt to Net Assets (TL-CL/NA)	454.5%	235.8%
Total Margin (ER/TR)	-10.01%	-4.10%
Measure of Available Funding		
Working Capital	\$62,611,587	\$51,509,072

Capital Requirements and Funding:

On Schedule 2, the applicant indicates capital projects totaling \$325,163, which includes this project (\$315,163) & capital expenditures (\$10,000). The applicant indicates on Schedule 3 of its application that funding for the project will be by related company financing. While the parent has a relatively weak overall financial position, it has sufficient liquidity to fund this project.

Conclusion:

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

CON Action Numbers: 10786 through 10792

Charis Healthcare Holdings, LLC (CON application #10790)

10790 - Charis Healthcare Holdings		
	Dec-22	Dec-21
Current Assets	\$9,331,571	\$8,269,497
Total Assets	\$13,408,351	\$12,239,861
Current Liabilities	\$6,310,798	\$5,042,607
Total Liabilities	\$11,130,749	\$8,477,733
Net Assets	\$2,277,602	\$3,762,128
Total Revenues	\$52,767,472	\$39,185,914
Excess of Revenues Over Expenses	\$1,550,290	\$3,362,639
Cash Flow from Operations	(\$2,725,813)	\$3,017,619
Short-Term Analysis		
Current Ratio (CA/CL)	1.5	1.6
Cash Flow to Current Liabilities (CFO/CL)	-43.19%	59.84%
Long-Term Analysis		
Long-Term Debt to Net Assets (TL-CL/NA)	211.6%	91.3%
Total Margin (ER/TR)	2.94%	8.58%
Measure of Available Funding		
Working Capital	\$3,020,773	\$3,226,890

Capital Requirements and Funding:

On Schedule 2, the applicant did not indicate the total of capital projects including the cost on Schedule 1 for this project of \$236,541. However, the applicant has three other CON applications with total project costs of \$709,623 submitted in this batching cycle. The applicant indicates on Schedule 3 of its application that funding for the project will be by cash on hand. Schedule 3 indicates \$1.3 million in cash on hand, but the financial statements presented show only \$655,165 in cash. It should also be noted that the applicant did not provide the required audited financial statements. Instead, it provided reviewed financial statements which are less in scope than an audit. In reviewing the financial statements provided, the applicant has \$3 million in working capital to fund capital projects. Given the lack of information provided on Schedule 2 it is unknown how many other capital projects are pending and/or underway.

Conclusion:

Funding for this project appears achievable. Funding for the entire capital budget is in question.

Moments Hospice of Broward, LLC (CON application #10791): The applicant is a developmental stage entity and has \$741,503 in cash but no operations.

Capital Requirements and Funding:

On Schedule 2, the applicant indicates capital projects totaling \$446,549, which includes this project (\$436,549) and capital expenditures (\$10,000). The applicant indicates on Schedule 3 of its application that funding for the project will be by cash on hand. With \$741,503 in cash, the applicant has sufficient resources to fund this project and all capital expenditures.

Conclusion:

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

Parkside Hospice and Palliative Care, LLC (CON application #10792):

The applicant is a developmental stage entity and has \$500,000 in cash but no operations.

Capital Requirements and Funding:

On Schedule 2, the applicant indicates capital projects totaling \$305,365, which includes this project only. 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, 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

Applies to all co-batched applicants: The immediate and long-term financial feasibility of the project is tied to expected profitability. Profitability for hospice is driven by two factors, volume of patients and length of stay/condition of the patient. A new hospice program in a SA with published need is more likely than not to be financially feasible since patient volume and mix is presumed to be available in sufficient amounts to sustain a new program. The focus of our review will be on the reasonableness of projections, specifically the revenue.

The vast majority of hospice days are paid by Medicare (Medicaid is the next largest payer with similar reimbursement rates). As such, revenue is predictable by day and service type. Schedule 7 includes revenue by service type. We have divided the applicant's projected revenues by the estimated Medicare reimbursement rates for each level of service in year two to estimate the total patient days that would be generated by that level of revenue. The results were then compared to the applicant's estimated number of patient days. Calculated patient days that

CON Action Numbers: 10786 through 10792

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.

AMOR Hospice Care, LLC (CON application #10786)

CON 10786	AMOR Hospice Care, LLC				
Broward	Wage Component	Wage Index	Adjusted Wage Amount	Unadjusted Component	Payment Rate
Base Rate Calculation					
Routine Home Care 1-60 days	\$144.10	0.97	\$139.78	\$74.23	\$214.01
Routine Home Care 61+ days	\$113.75	0.97	\$110.34	\$58.60	\$168.94
Continuous Home Care	\$1,177.23	0.97	\$1,141.91	\$388.23	\$1,530.14
Inpatient Respite	\$309.70	0.97	\$300.41	\$198.01	\$498.42
General Inpatient	\$727.27	0.97	\$705.45	\$418.04	\$1,123.49
Year Two Comparison	Inflation Factor Year Two	Inflation Adjusted Payment Rate	Schedule 7 Revenue Year 2	Continuous Service Hours Provided	Calculated Patient Days
Routine Home Care 1-60 days	1.129	\$241.70	\$1,974,815		8,171
Routine Home Care 61+ days	1.129	\$190.80	\$2,614,994		13,706
Continuous Home Care	1.129	\$1,728.13	\$416,472	24	241
Inpatient Respite	1.129	\$562.91	\$21,671		38
General Inpatient	1.129	\$1,268.86	\$1,074,957		847
		Total	\$6,102,909		23,003
				Days from Schedule 7	24,545
				Difference	1,542
				Percentage Difference	6.28%

As such, the applicant’s projected patient days are 6.28 percent or 1,542 days more than the number of patient days calculated by staff. Revenues appear to be understated, which is a conservative assumption. Operating profits from this project are expected to increase from a net loss of \$532,290 in year one to a net profit of \$220,629 in year two.

Conclusion:

This project appears to be financially feasible.

CON Action Numbers: 10786 through 10792

Arc Hospice of Florida, LLC (CON application #10787)

CON 10787	Arc Hospice of Florida				
Broward	Wage Component	Wage Index	Adjusted Wage Amount	Unadjusted Component	Payment Rate
Base Rate Calculation					
Routine Home Care 1-60 days	\$144.10	0.97	\$139.78	\$74.23	\$214.01
Routine Home Care 61+ days	\$113.75	0.97	\$110.34	\$58.60	\$168.94
Continuous Home Care	\$1,177.23	0.97	\$1,141.91	\$388.23	\$1,530.14
Inpatient Respite	\$309.70	0.97	\$300.41	\$198.01	\$498.42
General Inpatient	\$727.27	0.97	\$705.45	\$418.04	\$1,123.49
Year Two Comparison	Inflation Factor Year Two	Inflation Adjusted Payment Rate	Schedule 7 Revenue Year 2	Continuous Service Hours Provided	Calculated Patient Days
Routine Home Care 1-60 days	1.114	\$238.36	\$3,906,848		16,391
Routine Home Care 61+ days	1.114	\$188.16	\$1,927,546		10,244
Continuous Home Care	1.114	\$1,704.27	\$174,616	24	102
Inpatient Respite	1.114	\$555.14	\$75,826		137
General Inpatient	1.114	\$1,251.34	\$512,762		410
		Total	\$6,597,598		27,283
			Days from Schedule 7		28,080
			Difference		797
			Percentage Difference		2.84%

As such, the applicant’s projected patient days are 2.84 percent or 797 days more than the number of patient days calculated by staff. Revenues appear to be understated, which is a conservative assumption. Operating profits from this project are expected to increase from a net loss of \$103,422 in year one to a net profit of \$772,431 in year two.

Conclusion:

This project appears to be financially feasible.

CON Action Numbers: 10786 through 10792

Bonita Springs Healthcare Services, LLC (CON application #10788):

CON 10788	Bonita Springs Healthcare Services, LLC				
Broward	Wage Component	Wage Index	Adjusted Wage Amount	Unadjusted Component	Payment Rate
Base Rate Calculation					
Routine Home Care 1-60 days	\$144.10	0.97	\$139.78	\$74.23	\$214.01
Routine Home Care 61+ days	\$113.75	0.97	\$110.34	\$58.60	\$168.94
Continuous Home Care	\$1,177.23	0.97	\$1,141.91	\$388.23	\$1,530.14
Inpatient Respite	\$309.70	0.97	\$300.41	\$198.01	\$498.42
General Inpatient	\$727.27	0.97	\$705.45	\$418.04	\$1,123.49
Year Two Comparison	Inflation Factor Year Two	Inflation Adjusted Payment Rate	Schedule 7 Revenue Year 2	Continuous Service Hours Provided	Calculated Patient Days
Routine Home Care 1-60 days	1.114	\$238.36	\$3,827,758		16,059
Routine Home Care 61+ days	1.114	\$188.16	\$852,040		4,528
Continuous Home Care	1.114	\$1,704.27	\$562,363	24	330
Inpatient Respite	1.114	\$555.14	\$244,241		440
General Inpatient	1.114	\$1,251.34	\$688,182		550
		Total	\$6,174,584		21,907
			Days from Schedule 7		24,283
			Difference		2,376
			Percentage Difference		9.79%

As such, the applicant’s projected patient days are 9.79 percent or 2,376 days more than the number of patient days calculated by staff. Revenues appear to be understated, which is a conservative assumption. Operating profits from this project are expected to increase from a net loss of \$260,132 in year one to a net profit of \$653,844 in year two.

Conclusion:

This project appears to be financially feasible.

CON Action Numbers: 10786 through 10792

Bristol Hospice – South Florida, LLC (CON application #10789)

CON 10789	Bristol Hospice South Florida, LLC				
Broward	Wage Component	Wage Index	Adjusted Wage Amount	Unadjusted Component	Payment Rate
Base Rate Calculation					
Routine Home Care 1-60 days	\$144.10	0.97	\$139.78	\$74.23	\$214.01
Routine Home Care 61+ days	\$113.75	0.97	\$110.34	\$58.60	\$168.94
Continuous Home Care	\$1,177.23	0.97	\$1,141.91	\$388.23	\$1,530.14
Inpatient Respite	\$309.70	0.97	\$300.41	\$198.01	\$498.42
General Inpatient	\$727.27	0.97	\$705.45	\$418.04	\$1,123.49
Year Two Comparison	Inflation Factor Year Two	Inflation Adjusted Payment Rate	Schedule 7 Revenue Year 2	Continuous Service Hours Provided	Calculated Patient Days
Routine Home Care 1-60 days	1.114	\$238.36	\$2,343,338		9,831
Routine Home Care 61+ days	1.114	\$188.16	\$3,885,276		20,649
Continuous Home Care	1.114	\$1,704.27	\$442,086	24	259
Inpatient Respite	1.114	\$555.14	\$344,702		621
General Inpatient	1.114	\$1,251.34	\$484,622		387
		Total	\$7,500,024		31,747
			Days from Schedule 7		34,450
			Difference		2,703
			Percentage Difference		7.85%

As such, the applicant’s projected patient days are 7.85 percent or 2,703 days more than the number of patient days calculated by staff. Revenues appear to be understated, which is a conservative position. Operating profits from this project are expected to increase from a net loss of \$399,481 in year one to a net profit of \$972,336 in year two.

Conclusion:

This project appears to be financially feasible.

CON Action Numbers: 10786 through 10792

Charis Healthcare Holdings, LLC (CON application #10790)

CON 10790	Charis Healthcare Holdings				
Broward	Wage Component	Wage Index	Adjusted Wage Amount	Unadjusted Component	Payment Rate
Base Rate Calculation					
Routine Home Care 1-60 days	\$144.10	0.97	\$139.78	\$74.23	\$214.01
Routine Home Care 61+ days	\$113.75	0.97	\$110.34	\$58.60	\$168.94
Continuous Home Care	\$1,177.23	0.97	\$1,141.91	\$388.23	\$1,530.14
Inpatient Respite	\$309.70	0.97	\$300.41	\$198.01	\$498.42
General Inpatient	\$727.27	0.97	\$705.45	\$418.04	\$1,123.49
Year Two Comparison	Inflation Factor Year Two	Inflation Adjusted Payment Rate	Schedule 7 Revenue Year 2	Continuous Service Hours Provided	Calculated Patient Days
Routine Home Care 1-60 days	1.114	\$238.36	\$2,061,228		8,648
Routine Home Care 61+ days	1.114	\$188.16	\$721,430		3,834
Continuous Home Care	1.114	\$1,704.27	\$0	24	0
Inpatient Respite	1.114	\$555.14	\$0		0
General Inpatient	1.114	\$1,251.34	\$0		0
		Total	\$2,782,658		12,482
			Days from Schedule 7		21,358
			Difference		8,876
			Percentage Difference		41.56%

As such, the applicant’s projected patient days are 41.56 percent or 8,876 days more than the number of patient days calculated by staff. Revenues appear to be understated, which is a conservative assumption. Operating profits from this project are expected to increase from a net profit of \$497,940.33 in year one to a net profit of \$728,255 in year two. It should be noted that the applicant is only projecting Routine Home Care and does not include any revenue for Continuous Home Care, Inpatient Respite and General Inpatient. These levels of care are required to be made available and are more costly to deliver. The overall level of profitability percentage would likely be lower if the applicant projected the required other levels of service.

Conclusion:

This project appears to be financially feasible. However, the overall level of profitability is likely overstated.

CON Action Numbers: 10786 through 10792

Moments Hospice of Broward, LLC (CON application #10791)

CON 10791	Moments Hospice of Broward, LLC				
Broward	Wage Component	Wage Index	Adjusted Wage Amount	Unadjusted Component	Payment Rate
Base Rate Calculation					
Routine Home Care 1-60 days	\$144.10	0.97	\$139.78	\$74.23	\$214.01
Routine Home Care 61+ days	\$113.75	0.97	\$110.34	\$58.60	\$168.94
Continuous Home Care	\$1,177.23	0.97	\$1,141.91	\$388.23	\$1,530.14
Inpatient Respite	\$309.70	0.97	\$300.41	\$198.01	\$498.42
General Inpatient	\$727.27	0.97	\$705.45	\$418.04	\$1,123.49
Year Two Comparison	Inflation Factor Year Two	Inflation Adjusted Payment Rate	Schedule 7 Revenue Year 2	Continuous Service Hours Provided	Calculated Patient Days
Routine Home Care 1-60 days	1.103	\$236.12	\$5,728,401		24,260
Routine Home Care 61+ days	1.103	\$186.39	\$1,364,550		7,321
Continuous Home Care	1.103	\$1,688.26	\$354,995	24	210
Inpatient Respite	1.103	\$549.92	\$89,062		162
General Inpatient	1.103	\$1,239.59	\$507,279		409
		Total	\$8,044,287		32,363
			Days from Schedule 7		34,798
			Difference		2,435
			Percentage Difference		7.00%

As such, the applicant’s projected patient days are 7.0 percent or 2,435 days more than the number of patient days calculated by staff. Revenues appear to be understated, which is a conservative assumption. Operating profits from this project are expected to increase from a net loss of \$1,291,719 in year one to a net profit of \$751,572 in year two.

Conclusion:

This project appears to be financially feasible.

CON Action Numbers: 10786 through 10792

Parkside Hospice and Palliative Care, LLC (CON application #10792)

CON 10791	Parkside Hospice & Palliative Care				
Broward	Wage Component	Wage Index	Adjusted Wage Amount	Unadjusted Component	Payment Rate
Base Rate Calculation					
Routine Home Care 1-60 days	\$144.10	0.97	\$139.78	\$74.23	\$214.01
Routine Home Care 61+ days	\$113.75	0.97	\$110.34	\$58.60	\$168.94
Continuous Home Care	\$1,177.23	0.97	\$1,141.91	\$388.23	\$1,530.14
Inpatient Respite	\$309.70	0.97	\$300.41	\$198.01	\$498.42
General Inpatient	\$727.27	0.97	\$705.45	\$418.04	\$1,123.49
Year Two Comparison	Inflation Factor Year Two	Inflation Adjusted Payment Rate	Schedule 7 Revenue Year 2	Continuous Service Hours Provided	Calculated Patient Days
Routine Home Care 1-60 days	1.114	\$238.36	\$1,711,400		7,180
Routine Home Care 61+ days	1.114	\$188.16	\$2,268,600		12,057
Continuous Home Care	1.114	\$1,704.27	\$93,900	24	55
Inpatient Respite	1.114	\$555.14	\$0		0
General Inpatient	1.114	\$1,251.34	\$81,200		65
		Total	\$4,155,100		19,357
			Days from Schedule 7		20,537
			Difference		1,180
			Percentage Difference		5.75%

As such, the applicant’s projected patient days are 5.75 percent or 1,180 days more than the number of patient days calculated by staff.

Revenues appear to be understated, which is a conservative assumption. Operating profits from this project are expected to increase from a net loss of \$392,112 in year one to a net profit of \$265,340 in year two.

Conclusion:

This project appears to be financially feasible.

- e. **Will the proposed project foster competition to promote quality and cost-effectiveness? ss. 408.035(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: None of the co-batched projects, strictly, from a financial perspective, will have a material impact on price-based competition. However, the introduction of a new provider in the SA should foster competition to improve quality and cost-effectiveness.

- f. **Are the proposed costs and methods of construction reasonable? Do they comply with statutory and rule requirements? ss. 408.035(8), Florida Statutes; Ch. 59A-4, Florida Administrative Code.**

There are no construction costs and methods associated in establishing the proposed hospice programs.

- g. **Does the applicant have a history of providing health services to Medicaid patients and the medically indigent? Does the applicant propose to provide health services to Medicaid patients and the medically indigent? ss. 408.035 (9), Florida Statutes.**

Hospice programs are required by federal and state law to provide hospice patients with inpatient care when needed (42 Code of Federal Regulations 418.108). Hospice care also must be provided regardless of ability to pay and regardless of age, race, religion, sexual orientation, diagnosis, payer source or financial status. Therefore, the Agency will not impose a charity care or Medicaid patient day condition on an applicant.

AMOR Hospice Care, LLC (CON application #10786): While a new organization, AMOR Hospice leadership has experience serving Medicaid and indigent patients. It details its commitment to this population. AMOR Hospice plans to dedicate at least 4.5 percent of admissions to Medicaid patients in the first two years and serving at least two percent of its patients without insurance (indigent) in the first two years.

Arc Hospice of Florida, LLC (CON application #10787) emphasizes its commitment to serving all patients in the SA, regardless of their ability to pay. Arc's Schedule 7A indicates the applicant proposes to provide 3.5 percent of year one and year two patient days to Medicaid patients.

Notes to the applicant's Schedule 7A state "Self-pay which would consist primarily of charity care and uncompensated care, is projected at 1.0% of patient days".

Bonita Springs Healthcare Services, LLC (CON application #10788), cites it prioritizes serving underserved communities, particularly the homeless population. Schedule 7A indicates the applicant proposes to

CON Action Numbers: 10786 through 10792

provide 5.4 percent and self-pay 1.0 percent of year one and year total annual patient days. Notes to the schedule indicate 0.90% of all revenue will be written off as “Charity Care”.

Bristol Hospice – South Florida, LLC (CON application #10789) emphasizes its commitment to serving Medicaid patients and the low income population and presents historical data to support this claim. Bristol’s Schedule 7A indicates the applicant proposes to provide 1.9 percent of year one and 2.0 percent of year two patient days to Medicaid patients. Schedule 7A shows Self-pay 5.3 percent of year one patient days and 2.0 percent in year two. Schedule 7 notes state “We estimate that 2% of our census will receive charity care in year two...the relative self-pay (i.e. charity) percentage is higher in year one with the initial months of operation prior to CMS certification”.

Charis Healthcare Holdings, LLC (CON application #10790) states it is committed to providing hospice care to all terminally ill patients, regardless of their financial situation. It recognizes the need to support medically indigent and Medicaid patients and will actively work to address the unmet needs of underserved populations in its service area. Notes to the applicant’s Schedule 7A indicates Charis proposes to provide 0.5 percent of its payor days to Medicaid patients and “self-pay, largely made up of charity care and uncompensated care, is projected to be less than 1.0% of the patient days”.

Moments Hospice of Broward, LLC (CON application #10791) cites the experience of other Moments Hospice locations. These programs, operating in areas with lower uninsured and poverty rates admitted approximately four percent of patients through Medicaid and charity care in 2024 (year to date). Moments Schedule 7A projects Medicaid will be 7.0 percent and charity care 5.0 percent of year one and year total annual patient days.

Parkside Hospice and Palliative Care, LLC (CON application #10792) proposes to have a Medicaid patient day percentage of 2.5 percent in the first two years of operation. The applicant plans to provide pro bono days, which will amount to 186 days in year one and 419 days in year two. These days are included in the self-pay category on the financial projections.

F. SUMMARY

The applicants projects are in response to the need for an additional hospice in SA 10.

AMOR Hospice Care, LLC (CON application #10786) is a newly formed for profit entity established in Florida on February 9, 2024.

AMOR Hospice expects issuance of license in July 2025, and initiation of service July 2025.

The applicant proposes \$518,811 in total project costs, including equipment, project development, and start-up costs.

AMOR Hospice proposes 20 Schedule C conditions.

Arc Hospice of Florida, LLC (CON application #10787) has an approved CON #10642 for SA 3E.

The applicant expects issuance of license in January 2025, and initiation of service January 2025.

The applicant proposes \$373,370 in total project costs, including equipment, project development, and start-up costs.

Arc Hospice proposes 12 Schedule C conditions.

Bonita Springs Healthcare Services, LLC (CON application #10788) is a newly formed for profit entity established in Florida on February 21, 2024.

The applicant expects issuance of license on October 15, 2024, and initiation of service January 1, 2025.

The applicant proposes \$436,449 in total project costs, including building, equipment, project development, and start-up costs.

Bonita Springs offers 35 Schedule C conditions.

Bristol Hospice – South Florida, LLC (CON application #10789) is a newly formed for profit entity established in Florida on February 12, 2024.

The applicant expects issuance of license on December 31, 2024, and initiation of service January 1, 2025.

CON Action Numbers: 10786 through 10792

The applicant proposes \$315,163 in total project costs, including equipment, project development, and start-up costs.

Bristol Hospice offers 17 Schedule C conditions.

Charis Healthcare Holdings, LLC (CON application #10790) is a for profit entity established in Florida on March 31, 2014.

The applicant expects issuance of license in October 2024, and initiation of service January 2025.

The applicant proposes \$236,541.28 in total project costs, including equipment, project development, and start-up costs.

Charis offers eight Schedule C conditions.

Moments Hospice of Broward, LLC (CON application #10791) is a newly formed development stage corporation established in Florida on February 20, 2024.

The applicant expects issuance of license in September 2024, and initiation of service in September 2024.

The applicant proposes \$436,549 in total project costs, which include equipment, project development, and start-up costs.

Moments Broward offers conditions in 17 areas in its Schedule C conditions.

Parkside Hospice and Palliative Care, LLC (CON application #10792) is a newly formed for profit entity established in Florida on March 21, 2024.

The applicant expects issuance of license in January 2025, and initiation of service in June 2025.

The applicant proposes \$305,365 in total project costs and includes project development cost and start-up costs.

Parkside Hospice offers 10 Schedule C conditions.

Need/Access:

AMOR Hospice Care, LLC (CON application #10786) highlights both numerical need and the importance of culturally competent care for a growing and diverse elderly population. Factors cited in support of its need include

- **Population Growth:** Broward County's population is projected to grow by 5.23 percent by 2030, with an even sharper increase (23.9 percent) in the elderly (65+) population. This translates to a rising need for hospice services.
- **Shifting Demographics:** AMOR Hospice emphasizes the significant demographic shift within the elderly population. Hispanic and Black populations are growing rapidly, surpassing the Non-Hispanic White population by 2030.
- **Cultural Competency:** AMOR Hospice recognizes the importance of catering to this diverse population. Its focus on building a culturally competent team and offering services tailored to specific needs positions them well to serve the community.

Arc Hospice of Florida, LLC (CON application #10787) argues that its proposed hospice program is necessary to meet the growing needs of SA 10. Arc Hospice further details several areas where its program would improve access to end-of-life care, including:

- Demographic trends and expected growth in SA 10
- Overall access and availability of hospice services
- Disease-specific care
- Care for ethnic communities
- Care for the homeless and low-income population
- Care for veterans

The applicant highlights these areas as both unmet needs and cites Arc's community support.

Bonita Springs Healthcare Services, LLC (CON application #10788) emphasizes its commitment to serving all residents of Broward County in need of hospice care, regardless of race, religion, ethnicity, or socioeconomic status. Bonita Springs cites additional factors support its need.

- **Muslim Community:** BSHS recognizes the growing Muslim population and plans to hold outreach meetings at mosques and Islamic centers throughout the county. Meetings will be conducted in the predominant languages spoken by these communities.
- **Need for services** focused on the cultural, linguistic, and religious needs of the Muslim, Hindu, Hispanic, and African American communities.

CON Action Numbers: 10786 through 10792

- **Hispanic Community's** lower utilization rates of hospice care among Hispanics, particularly Catholic Hispanics who may have concerns about compatibility with their faith. The applicant plans to address this through:
- **African American Community:** BSHS plans to hold outreach meetings in predominantly African American neighborhoods, with presentations offered in English, Spanish, and other relevant languages.
- Homeless and Near-Homeless: BSHS recognizes the challenges faced by this population in accessing healthcare.
- Geographically Remote and ALF Residents: BSHS will ensure these often-overlooked populations receive outreach efforts to ensure they are aware of hospice care options.
BSHS highlights its experience in telehealth and tele hospice programs and its commitment to utilizing this technology to improve access to care, particularly for end-stage cardiac patients.

Bristol Hospice – South Florida, LLC (CON application #10789)

argues Broward County needs its proposed program due to a growing elderly population and a projected service gap.

- **Growing Elderly Population:** Broward County's elderly population is rapidly growing, leading to a significant increase in hospice service demands.
- **Community Needs Assessment** needs include serving facility-based patients, those with specific conditions (e.g., Alzheimer's), minorities and low-income residents with lower utilization rates, and veterans.
- **Strong Community Support:** Bristol has garnered strong support from skilled nursing facilities, particularly for its unique offerings like timely response to referrals, innovative programs, and specialized dementia and nighttime care.
- **Serving All Settings:** Bristol caters to various residential settings, including skilled nursing facilities, assisted living facilities, adult family care homes, and in-home care, ensuring no patient is left behind.

Charis Healthcare Holdings, LLC (CON application #10790) states understanding client needs by offering specialized programs tailored to prevalent diseases in SA 10. This includes a "Cancer Information and Care" program providing training, education, and resources for staff, healthcare professionals, caregivers, and patients. Similarly, a "Cardiovascular Care" program will train staff, healthcare professionals, and community members on high-acuity cardiac services. These targeted initiatives exemplify Charis' focus on addressing the specific needs of the SA 10 community.

Moments Hospice of Broward, LLC (CON application #10791)

contends the projected gap of 1,245 hospice admissions translates to a real disparity in access, particularly for senior citizens (63 percent of the unmet need) and those battling illnesses beyond cancer (62 percent).

Need is supported by:

- Open Access Programs Not Available in Broward County
- Level of Service Enhances Access and Quality of End-of-Life Care
- Cardiac Patients are Underserved
- Alzheimer Patients are Underserved
- Minorities are Underserved
- Opportunity to Enhance Veteran Hospice Services
- Collaboration with Senior Primary Care Clinics to Elevate Hospice Utilization Amongst Seniors
- Palliative Care as Bridge to Hospice
- Enhance Overall Hospice Utilization with Moments Specialized Programming

This commitment to inclusivity is evident in its widespread support. Endorsements from 187 stakeholders, including all major hospital systems and numerous religious organizations, veterans' groups, and individual physicians, solidify Moments Broward's reputation and dedication to collaborative, culturally competent care.

Parkside Hospice and Palliative Care, LLC (CON application #10792)

identified a gap in hospice services in SA 10 and applied to address this unmet need. It conducted a comprehensive needs assessment, analyzing data on demographics, hospital utilization, and population health, as well as holding community meetings to gain insights from local leaders, residents, and healthcare workers. Based on the findings, Parkside developed a customized hospice program proposal that aims to directly address the specific needs identified in the community.

The assessment revealed several key trends, including an expected growth in Broward County's senior population (65+), a higher proportion of hospice admissions due to cancer, and a potential need for increased hospice services for younger populations (under 65) and those with diagnoses other than cancer.

Parkside's proposal highlights the need to expand hospice services to meet the growing demand from this age group, as well as addressing disparities in hospice utilization among minority populations. It plans to partner with local organizations to improve access to care in underserved areas and support specific patient needs, such as those with Alzheimer's and dementia, and veterans.

Parkside's conservative forecast predicts 151 admissions in year one and 303 admissions in year two, which is below the 350-admission threshold required by the AHCA rule. However, the applicant believes its locally focused approach will allow them to capture unmet needs without harming existing hospices.

Quality of Care:

All co-batched applicants demonstrate the ability to provide quality care.

AMOR Hospice Care, LLC (CON application #10786), states its focus is on providing quality care to Broward County. Its commitment is evident in several areas - **CHAP Accreditation, +Comprehensive Care, Unique Programs, and +Culturally Competent Care.**

Arc Hospice of Florida, LLC (CON application #10787) prioritizes quality care through a robust Quality Assurance Performance Improvement (QAPI) program. This program fosters a culture of continuous improvement, ensuring adherence to internal and external standards.

Bonita Springs Healthcare Services, LLC (CON application #10788) prioritizes quality care and exceptional service for its patients and families. Its experienced leadership and management philosophy emphasizes focusing on staff, quality service, and customer satisfaction, believing this will lead to positive business results.

BSHS emphasizes the importance of continuous quality improvement through data collection, analysis, and program revisions based on findings. It highlights the applicant's reliance on experienced staff to ensure appropriate data is collected and shared for ongoing improvement.

Bristol Hospice – South Florida, LLC (CON application #10789) addresses the capacity gap by prioritizing high-quality care for Broward County's elderly population utilizing **Increased Staffing Transportation Assistance Improved Patient Outcomes, Palliative Care Integration, Innovative Approaches.**

Charis Healthcare Holdings, LLC (CON application #10790) cites proven experience translates to high-quality care for SA 10. Its team of compassionate professionals, including hospice physicians, nurses, social workers, and chaplains, provides holistic care that addresses each patient's specific needs. Specialized programs for diseases like heart disease, cancer, and dementia ensure the most effective treatment.

CON Action Numbers: 10786 through 10792

Furthermore, Charis' commitment to quality extends to 24/7 service, guaranteeing support whenever needed.

Moments Hospice of Broward, LLC (CON application #10791), cites its proven track record of quality care to Broward County. Backed by Moments Hospice' accreditation and history of exceeding quality standards, Moments Broward is committed to continuous improvement.

Moments Quality Assessment and Performance Improvement (QAPI) program actively identifies and addresses potential issues before it impact patients.

Parkside Hospice and Palliative Care, LLC (CON application #10792) states it is committed to providing high-quality hospice care. The hospice has already established several programs in Georgia and Massachusetts and is seeking accreditation and certification to further improve quality care.

The hospice is committed to continuously monitoring and improving its performance through data analysis and performance measurement.

Financial Feasibility/Availability of Funds:

The co-batched projects, strictly, from a financial perspective, will not have a material impact on price-based competition. However, the introduction of a new provider in the SA should foster competition to improve quality and cost-effectiveness.

All applicants appear capable of funding the project and all capital projects.

All applicants appear to be financially feasible.

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).

All applicants discussed their history or parent's history of care to Medicaid and medically indigent patients and committed to serving all patients. Schedule 7A has the applicant's projected Medicaid and charity care (in notes).

G. RECOMMENDATION

Approve CON #10787 to establish a new hospice program in Service Area 10. The total project cost is \$373,370.

CONDITIONS:

General

- Arc Hospice will commit to conduct an annual Bereavement Symposium to provide local clergy and other professionals with resources to support those in grief.

Proposed Measure: This will be measured by annual reporting of the Symposium date and attendance to AHCA.

- Arc Hospice also proposes to provide annual funding of \$20,000 for at least the first five years, towards the Arc of Life program designated for the end-of-life wishes for Arc Hospice patients and their families beginning in the first year of operation.

Proposed Measure: This will be measured by reporting the expenditures of the funds to AHCA.

- Arc Hospice will develop and implement a pre-hospice palliative care program.

Proposed Measure: This will be measured by reports presented to AHCA detailing the program and initiatives within the program.

- Arc Hospice will allocate \$10,000 annually for five years to organizations in Broward County which support unfunded and undocumented community members by providing an array of medical services.

Proposed Measure: This will be measured by reporting the expenditures of the funds to AHCA.

Cultural, Ethnic, and Racial

- For the cultural connections outreach and education program, Arc Hospice commits \$15,000 annually for a period of five years for hosting quarterly community educational programs specifically for the Caribbean, Hispanic, and African American communities.

CON Action Numbers: 10786 through 10792

Proposed Measure: This will be measured by reporting the expenditures of the funds to AHCA.

- Arc Hospice will have in place a Cultural Liaison position, a key team member who is appointed to take the lead on minority outreach initiatives. This individual will be responsible for helping to identify, develop and implement strategies and plans to bridge cultural differences.

Proposed Measure: This will be measured by reports presented to AHCA detailing the position is filled and the progress of the development of annual initiatives.

- Arc Hospice commits \$20,000 annually for a period of five years for programming specifically for the Jewish community. Additionally, Arc Hospice will seek accreditation with the National Institute for Jewish Hospice within 18 months of initial licensure.

Proposed Measure: This will be measured by reporting the expenditures of the funds to AHCA and submitting certification for accreditation documentation upon receipt.

Education

- Arc Hospice commits to collaborating with Nova Southeastern University to develop a coordinated education curriculum related to hospice and provide high-quality field placement opportunities for the numerous healthcare professions degree programs offered at the university. This program will be supplemented with a \$20,000 annual funding commitment for, at a minimum, the first five years of operation.

Proposed Measure: This will be measured by reporting the expenditures of the funds to AHCA.

- Arc Hospice also commits to developing a formalized internship program with a local educational institution specifically to provide internship opportunities within Arc Hospice for the Caribbean, Hispanic, and African American communities. This program will be supplemented with a \$15,000 annual funding commitment for, at a minimum, the first five years of operation.

CON Action Numbers: 10786 through 10792

Proposed Measure: This will be measured by reporting the expenditures of the funds to AHCA.

- Arc Hospice is committed to providing internship opportunities to qualified students in nursing, gerontology, social work, music therapy, and pastoral counseling training programs within the hospice service area. This program will be supplemented with a \$15,000 annual funding commitment for, at a minimum, the first five years of operation.

Proposed Measure: This will be measured by reporting the expenditures of the funds to AHCA.

- Arc Hospice is committed to supporting and sponsoring hospice and palliative care certifications for its skilled nursing staff (CNA, LPN, RN, and APN). This program will be supplemented with a \$15,000 annual funding commitment for, at a minimum, the first five years of operation.

Proposed Measure: This will be measured by reporting the expenditures of the funds to AHCA.

Transportation

- Arc Hospice will allocate \$15,000 per year for three years to fund patient and family transportation needs where transportation is a barrier in the Service Area.

Proposed Measure: This will be measured by reports presented to AHCA detailing the progress of the development of the program. The reports will be annual until the program development is completed.

Approve CON #10791 to establish a new hospice program in Service Area 10. The total project cost is \$436,549.

CONDITIONS:

Initiation of Operation

Moments Hospice Conditions this application with submitting its licensure application for operations in Broward County within 30 days of being awarded the Certificate of Need.

- a. Moments conditions this application on notifying CHAP it is ready for its accreditation survey within 30

days of receiving state licensure. The Applicant will demonstrate compliance with this condition by submitting to AHCA a signed declaration in the annual conditions compliance report.

Patient Touches

Moments Hospice believes in giving generously of our services to improve the patient and family experience with hospice. Moments conditions this application with the following conditions:

- a. Responding to referrals within 1 hour of referral and starting the admission process within 2 hours of referral, subject to receiving the physician order and the patient and/or family being prepared to meet to initiate the hospice benefit,
- b. 24-hour Triage staffed by Moments Hospice direct employees with video capability. Additionally, Moments will have RNs available to do admissions 24/7/365, thus ensuring patients can receive the care they need to manage symptoms at all times, day and night.
- c. Hospice Aide Visits Providing at least five CNA visits per week on average, provided this is acceptable to the IDG, the patient, the patients family, and appropriate to the plan of care. When a need is present the patient will receive up to 7 CNA visits per week.
- d. Nursing Visits Providing at least two nursing visits per week on average, provided this is acceptable to the IDC, the patient, the patient's family and appropriate to the plan of care.
- e. Enterprise Car Lease Program 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.
- f. Team Member Recruitment Participation in at least 2 volunteer and/or job fairs a year for the first two years of operations.
- g. Communication & Coordination of Care - Communication tools and established expectations from patients and families at the time of admission are at the core of our Communication and Coordination of Care Program.
- h. Customization of care - An individualized hospice care plan is established by Moments Hospice interdisciplinary group in collaboration with the attending physician, the patient or

CON Action Numbers: 10786 through 10792

representative, and the primary caregiver in accordance with the patient's needs. Customized care is at the core of the Moments Hospice Way.

- i. Initial Moments Program - All patients residing in nursing home or care facility setting would be included in this program as described in schedule B.

These conditions will be measured by a signed declaration submitted by the Applicant to AHCA in the conditions compliance report.

Team Member Training

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

- a. Hospice and Palliative Care Certification Moments will pay for hospice staff to obtain and maintain Hospice and Palliative Care certification.
- b. Death Doula training will be offered to volunteers and staff beginning the first year of operations.
- c. Reiki 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 submitting signed declaratory statement in the conditions compliance report.

Services Beyond Core

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 this application with the following services:

- a. Transportation Moments Hospice Foundation will assist with transportation costs for families and patients with limited resources to receive transportation to visit one another.
- b. Lasting Moments Legacy Projects. These will provide a comforting memory of their loved one after they have transitioned from their life.
- c. Final Wishes for hospice patients. Requests will be processed through the Moments Hospice Foundation.

CON Action Numbers: 10786 through 10792

- d. Pets are such an important part of people's lives. They are more than pets, they are family. Knowing the benefits of pets for the comfort and palliation of patients' symptoms at the end-of-life Moments has added the following conditions to honor the importance of pets in people's lives.
 - i. 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.
 - ii. Pet Peace of Mind Program will be initiated in Broward County within the second year of operations. Pet Peace of Mind uses hospice volunteers to attempt to keep pets with the patients until end-of-life and provide reassurance that a home for the pet has been found so the pet is ready to make a smooth transition to the new home at the end of the patients' life. Initiating this program will help patients with some of the psychological pain that comes from leaving their beloved pets behind.
 - iii. Reimbursement for volunteers for the certification and required vaccinations for their pets to become certified pet therapy animal to visit hospice patients.
- e. Virtual Reality: 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.
- f. Rabbi and access to other religions Moments will have a Rabbi and will have agreements and/or working relationships with various faith backgrounds such as Catholic, Muslim, and Buddhist.
- g. Music Therapy on staff. These services will be made available to all of Moments patients as appropriate to the plan of care and subject to the wishes of the patient and family.
- h. Massage Therapy on staff. These services will be made available to all of Moments patients as appropriate to the plan of care and subject to the wishes of the patient and family.

Compliance will be documented in the annual condition's compliance report by a signed declaratory statement.

Veteran Services

Broward County is home to many elderly veterans who would benefit from specialized hospice programming.

CON Action Numbers: 10786 through 10792

We Honor Veterans Program: Moments Hospice conditions this application on implementing the We Honor Veterans program upon commencement of operations. Moments will attain level 4 Star certification during the first two years of operations.

Other aspects of Moments Hospices commitment to veterans will be as described below.

- a. 4 Stars Moments will attain 4 stars in the We Honor Veterans Program within the 2nd year of operation.
- b. Veteran Volunteers Moments Hospice will recruit and retain veteran volunteers to provide veteran to veteran visits.
- c. Veteran Liaison A Veteran Liaison will be hired and provided special training to work with veteran organizations.
- d. Veteran Pinnings Moments Hospice will do 250 pinning's a year for 2 years.
- e. Veterans Honor Walls Creation of Veterans Honor Walls in at least 2 healthcare facilities in Broward County per year for two years. This will honor veterans living within these facilities and provide them with a sense of pride.
- f. Application Sponsorship for Veterans Moments Hospice will provide sponsorship to 2 veterans a year to complete application for additional homecare services through their VA benefit. This sponsorship will continue for at least 2 Years starting at least by the second year of operations for applications for VA benefit through VeteranCare or like organization. VeteranCare has noted to Moments Hospice that terminally ill veterans often do not receive this benefit related to the lengthy application process. Through a hardship letter from the physician and Moment's sponsorship of the application completion, more veterans can receive this benefit.
- g. Honor Flight Sponsorship Honor Flight Network sponsorship for at least 2 veterans a year for 3 years starting no later than the second year of operations through the south Florida Honor Flight Hub or like organization. Compliance will be demonstrated by submitting proof of payment.
- h. Advance Care Planning Annually for 2 years Advance Care Planning sessions will be offered to veteran groups utilizing the five wishes or similar document.

The Applicant will demonstrate compliance with this condition by a signed declaratory statement in the annual conditions compliance report.

Open Access

Broward County 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, upon commencement of operations. Compliance will be demonstrated by a signed declaration in the annual conditions compliance report. The program will include these elements:

- a. Full Code patients Accepting eligible hospice patients, regardless of their code status.
- b. Medically Complexity Accepting eligible hospice patients receiving medically complex high acuity services 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.
- e. National Institute for Jewish Hospice 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.
- f. Bridge Program - This program serves as a bridge of transition from open access hospice to standard hospice. It allows patients to access their Hospice benefit while continuing certain treatments or medications that may otherwise be considered "life prolonging" for a defined period of time with the goal of ultimately discontinuing said treatment/medication once the patient/family has been emotionally, physically, or spiritually prepared.

Compliance with this condition will be demonstrated by a signed declaratory statement on the annual conditions compliance report.

Specialty Clinical Programs

Moments has developed programs that support our mission of Changing the Hospice Experience One Moment at a Time. Moments Hospice conditions this application with the initiation of the following programs within the first year of operation.

Cardiac and Pulmonary Program

- a. CHIRP Program- Cardiopulmonary Hospital Intervention & Readmission Program — As described in Schedule B.
- b. AHA (American Heart Failure) Certification The Palliative/Hospice Heart Failure certification will assist Moments in providing the optimal care to Broward County residents with life limited and severe heart disease. Moments conditions this application with receiving the AHA (American Heart Association) certification by the end of the 2nd year of operations.
- c. A Respiratory Therapist will be contracted and available upon commencement of hospice operations.
- d. Consultant Pharmacists Access to pharmacists for consultation and recommendations.

Dementia Program

- a. M.I.N.D. (Memories, Inclusion, Namaste, Dignity) Program - A program for those with Dementia as described in schedule B.
- b. Items will be provided to dementia patients to help their palliation symptoms. These items may include items such as fidget blankets, busy boxes, interactive robotic pets, lifelike dolls, and weighted blankets. Compliance with this condition will be demonstrated with a signed declaratory statement in the annual conditions compliance report.
- c. 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.

Cancer

Triad Program - an approach to managing complex pain among patients with Cancer as described in schedule B.

Falls

StepPrep Program is a Fall Prevention Program as described in schedule B.

ALS (Amyotrophic Lateral Sclerosis) and Neurological Program Synapse Program which was developed due to the unique nature and progression of ALS and other neurological diseases, as described in schedule B.

Wound Program

Wound Program is for patients requiring wound management and is described in schedule B.

Sepsis Program

Sepsis Program will be used when patients with a primary diagnosis of Sepsis are admitted to hospice they will receive care as per this program as described in schedule B.

Renal Program

Renal Program is End Stage Renal Disease program and is described in schedule B.

Programs for Patients Approaching the Final Moments of Life

Final Moments —A program for all patients in their final moments of life as described in Schedule B. The program will include these elements:

- a. Muse Healthcare Analytics Moments will utilize Muse Healthcare Analytics or a similar program to identify patients entering their Final Moments.
- b. Death Doula Program Moments will implement the Death Doula program upon commencement of operations.
- c. Vigil Visits Moments Hospice trains staff, volunteers, and death doulas on providing care during the Final Moments also known as Active Phase of Dying. This Vigil Visit training equips team members, volunteers, and death doulas to provide comforting presence for patients and family members during the final days of life. Additionally, volunteers will be requested to make additional visits or sit with patients providing support to families and preventing patients from being alone. Moments will recruit volunteers specifically to support vigil visits with those nearing their last breath.
- d. Tender Moments Program -Companionship care program for all diagnoses as described in schedule B.

Moments conditions this application on providing all programs to hospice patients in Broward County, as appropriate to the patients Plan of Care. The programs will be implemented within the first year of operations. Compliance with the implementation of the programs will be demonstrated by a signed declaratory statement in the conditions compliance report. The programs are described in schedule B and will include these elements:

- a. Moments Staff Education Moments will train all IDG staff on the Moments Programs upon implementation of the programs and on hire going forward. Compliance will be demonstrated by a signed declaratory statement in the annual conditions compliance report.

CON Action Numbers: 10786 through 10792

- b. Nurse Preceptor Moments Hospice's nurse preceptor will manage and train team members on programs.
- c. Community Education Moments will provide community education programs to inform the community on topics related to programs. Moments will provide educational events related to programs available four times a year, during the first two years of operations. Compliance will be demonstrated with attached sign in sheets for educational offerings in the annual conditions compliance report.
- d. Education Trailer Moments Hospice will extend use of the education trailer into Broward County to assist with education and outreach.

Supporting Minorities

Moments recognizes the diverse communities in Broward County who experience cultural barriers to care, including several Hispanic cultures, Black (Haitian, African American, etc.) residents, Jewish residents, and LGBTQIA+ residents. Moments Hospice conditions this application with providing the following elements.

- a. Bilingual Team Members To increase these residents' use of hospice services, Moments will hire bilingual staff.
- b. Bilingual Volunteers Moments will recruit and retain hospice volunteers that are bilingual.
- c. All Languages available
- d. SAGE Care 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.
- e. Food Drives Moments will conduct and/or partnering in at least 2 food drives or fund raising and awareness events for community members who are experiencing hardship during each of the first 2 years.
- f. Donations to provide aid for the homeless. Moments conditions this application on donating \$10,000 a year for 2 years to non-profit organizations who provide aid to the homeless or less fortunate.

The Applicant will demonstrate compliance with this condition by submitting a signed declaratory statement in the annual conditions compliance report.

Palliative Care

There is a need for palliative care for people not eligible or ready for hospice. Moments already has an established Palliative care program in Miami-Dade County and will extend its services seamlessly into Broward County. Moments Palliative Care program is CHAP Certified. The CHAP Palliative Care Standards were developed by providers of palliative care and the National Consensus Project for Quality Palliative Care. CHAP Certification 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 a signed declaratory statement as part of the conditions compliance report to AHCA.

Community Education

Providing education to the community helps everyone. As the saying goes "A rising tide lifts all boats". Moments conditions this application on the following community education initiatives:

- a. Five Wishes Moments conditions this application with the provision on Advance Care Planning education being provided to the community. This education will be provided with the 5 wishes or similar document. These documents will be available in English and Spanish. Upon request the document can be made available in other languages. These will be offered to the community at least 2 times a year.
- b. Education for Care Facilities Moments conditions this application with providing education in Skilled Nursing, Long Term Care, and Assisted Living Facilities. This education will be offered at least 4 times a year for 2 years.
- c. Internships Moments Conditions this application to provide internships to students in Broward County.
- d. Scholarships and Grants Moments Hospice conditions this application with providing scholarships or grants to schools for the education of minority or underserved persons in the community hoping to advance from CNA to LPN or RN and/or LPNs working to advance to RN. This will increase the number of nurses in Broward County to care for the residents. It will also help to provide opportunities to minorities and other residents experiencing hardship to improve their life circumstances. These grants/scholarships will be in the amount of \$5,000 per year for 2 years.
- e. Compliance will be demonstrated with a signed declaratory statement on the annual condition's compliance report.

Community Bereavement Support

- a. Grief and loss affect so many. Moments Hospice Bereavement program offers grief support to the loved ones of the patients we serve. Community members may be experiencing grief and not know where to turn or how to find the resources to help them through the emotions they are processing. Moments Hospice wants to support the community and help facilitate discussions about grief and provide ways for the community to access resources. Moments conditions this application with the following:
- b. Bereavement Program - Our trained bereavement coordinators follow our bereaved families for 13 months after the death of their loved one. As grief is an individual journey Moments Hospice will extend bereavement support for up to 24 months (about 2 years) for those who need the additional support.
- c. Children's Bereavement Center (CBC) Partnership Moments will donate \$5,000 per year during its first two years of operations to Children's Bereavement Center (CBC) to support its existing bereavement services and groups in south Florida. CBC provides bereavement services to Broward, Miami-Dade, and Palm Beach counties. The bereavement services are available for people from age 4 through the end-of-life. Their services are always offered free of charge to those in need. The Applicant will demonstrate compliance with this condition by providing AHCA proof of donations.
- d. Local In-Person Support Group Moments Hospice conditions this application with provision of a local in-person support group. This group may be done in collaboration with Children's Bereavement Center or like organization. This will be offered to the bereaved family members of Moments Hospice but will also welcome in community members who are experiencing grief.
- e. Greif Discovery Workshop We recognize that everyone grieves in their own way and time Moments Hospice will offer annually for at least 2 years a Greif [sic] Discovery Workshop starting by the second year of operations. It will be a day where bereaved family and friends can come and experience various options so they can utilize them in their healing journey going forward. Experiences could include activities such as: art, journaling, yoga, reiki, meditation, walking/hiking, tai chi, somatic work, sound healing/music/dance, EFT (Emotional Freedom Technique) or other therapeutic and complementary and alternative

methods to aide people in processing grief. Attendees could sample different ways of processing grief to find those most helpful for them during their mourning time. Additionally, this would allow grieving people to meet and connect with other people experiencing loss. This event would be open to members of the community providing free access to this information to any community member needing it, including minorities or socially disadvantaged people who may ordinarily not have access to this information.

- f. Butterfly Memorials Moments Conditions this application with the provision of a butterfly memorial or similar ceremony. This will occur at least 4 times per year for 2 years starting by the second year of operations or earlier. This will be provided for the bereaved Moments Hospice and partnering facilities who have had resident's pass.
- g. Children's Bereavement Support Moments Hospice conditions this application with providing support to children who experience grief. This support may include events in conjunction with Children's Bereavement Center (CBC) or like organizations for expressions through grief.
- h. Children's Grief Backpacks Support will also be provided through the provision of grief backpacks with supportive items inside to help children express and work through their grief. When the bereaved family members include children, age-appropriate backpacks will be sent out as requested by the bereavement team at Moments Hospice.
- i. Compliance with this condition will be demonstrated with a signed declaration in the annual condition compliance report.

Community Initiatives and support

Moments Hospice conditions this application on the following donations or involvement in community projects/initiatives to support the community.

- a. Toy Drives Moments Hospice conditions this application to participate or organize 2 toy drives during the holiday season during the first 2 years of operation. Moments wants to give back to the community in Broward County by helping families experiencing hardship will help ensure they have a fun and fulfilling holiday season. Moments will work with local partners or nonprofits in these toy drives.
- b. Donations to Cancer Organizations Moments conditions this application on donating \$5,000 to a non-profit organization to support patients going through cancer or other serious health issues in the region during each of Moments' first three years of operation.

CON Action Numbers: 10786 through 10792

- c. Donations to Non-Profits Moments Hospice wants to support the community, provide resources and solace to those who are disenfranchised, underserved in the current healthcare arena, experiencing hardship, or part of minority populations. Moments Hospice Conditions this application with providing donations of \$15,000 per year for the first 3 years of operations to non-profit organizations.
- d. Donation to Establish Commercial Food Kitchen Moments Hospice conditions this application with providing financial support of \$10,000 a year for three years of operations to a nonprofit organization who will establish a commercial food kitchen to support the needs of underserved families and patients hospitalized in Broward County.

Compliance will be demonstrated with a signed declaratory statement and proof of donations in the conditions compliance report.

Moments Hospice Foundation

Moments conditions this application donating \$10,000 per year to the Moments Hospice Foundation for the first 3 years of operation to fund wish fulfillment and veterans' programs. The Applicant will demonstrate compliance with this condition by providing AHCA with a copy of the checks or funds transfer.

Moments is committed to not soliciting any donations for the Moments Hospice Foundation.

Other

Compliance Hotline Health Care workers want to work for ethical compliant companies. Moments Hospice contracts with Ethical Advocate to provide 24-hour, everyday access for ethical and compliance concerns to be anonymously reported. Having access to this resource will ensure Moments can attract ethical heart centered employees to provide care to our hospice patients. Moments will provide a compliance hotline to all Moments Hospice staff at commencement of operations. Compliance will be demonstrated with signed declaratory statement in the annual conditions compliance report.

CON Action Numbers: 10786 through 10792

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 believes they will improve hospice utilization and quality. Therefore, Moments has conditioned this application on employees who will be responsible 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 in its annual conditions compliance report.

Deny CON #10786, 10788, 10789, 10790 and 10792.

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: June 21, 2024



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



Certificate of Need
2727 Mahan Drive
Building 2
Tallahassee, FL 32308
Ph: 850-412-4401