

From: [Audra Allen](#)
To: [Ann R. Reed](#)
Subject: Re: [EXTERNAL] Request for Classification Guidance – Serenity Surgical Recovery
Date: Tuesday, February 24, 2026 5:04:04 PM
Attachments: [image003.png](#)
[image005.png](#)

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Good afternoon Ms. Reed,

Thank you for your thoughtful follow-up questions. I appreciate the opportunity to further clarify the structure of Serenity Surgical Recovery.

Serenity Surgical Recovery is intended to operate as a private, short-term recovery residence providing non-medical supportive assistance to medically stable adults following outpatient procedures performed elsewhere.

Please see responses below:

Physician Orders (#4 and #5)

Serenity Surgical Recovery does not initiate or direct medical treatment. Clients remain under the care of their operating surgeon at all times. Any post-operative instructions followed during the stay are based solely on written discharge instructions provided by the surgeon.

Lymphatic massage services, when provided, are performed by appropriately trained personnel and are supportive in nature.

Physician Involvement During the 1–5 Day Stay

The operating surgeon remains responsible for the client's medical care. Serenity Surgical Recovery does not replace or assume the role of a treating provider. Any medical concerns are directed to the surgeon or emergency services as appropriate.

Nature of the Location

The 1–5 day stay is considered a temporary private residence voluntarily selected by the client for comfort and recovery support. It is not intended to function as a healthcare facility, assisted living facility, or home health agency.

Assessments and Plans of Care

No independent medical assessments, diagnoses, or formal medical plans of care are developed. Services are supportive in nature and limited to assistance with daily activities, comfort measures, meal preparation, and coordination of non-medical needs.

Clients are required to be medically stable prior to arrival and must have undergone their procedure at a licensed surgical facility.

Please let me know if additional clarification would be helpful. I appreciate your guidance as we ensure compliance with Tennessee regulations.

Kind regards,
Audra M. Allen, DNP, RN
Serenity Surgical Recovery

On Tue, Feb 24, 2026 at 4:12 PM Ann R. Reed <Ann.R.Reed@tn.gov> wrote:

Dr. Allen

Good afternoon. I have a few additional questions. You list the following as being some of the services to be provided by Serenity Surgical Recovery. For the bullet points #4 and 5, will there be a physician order directing this care?

- Post-operative monitoring (non-hospital level)
- Assistance with activities of daily living
- Medication reminders (no prescribing)
- Dressing changes and basic wound care
- Lymphatic massage (performed by appropriately trained personnel)
- Meal preparation and recovery support
- Transportation coordination (if applicable)

Will a physician be involved in the care of the patients during the 1 to 5 day stay? If the location these patients are in for the 1-to-5-day time period is not their regular place of residence, would you call this a temporary place of residence for them? Will nursing assessments be conducted during the 1-to-5-day period? Will a plan of care or an equivalent be developed.

I have also included to this email Caroline Tippens, Director of Licensure and Regulation, and Nathaneil Flinchbaugh, Deputy General Counsel for the Health F

*****Please note our mailing address has changed. Effective immediately, please direct all mail to the new address listed in the signature block below.***



Ann Rutherford Reed RN, BSN, MBA
Deputy Director, Licensure & Regulation
Health Facilities Commission

Andrew Jackson Building

502 Deaderick Street, 9th Floor

Ph: 615-532-6595

Email: ann.r.reed@tn.gov

<https://tn.gov/hfc>

Mission Statement: Protecting patients and promoting quality in healthcare facilities.

acilities Commission, for further thoughts and considerations.

From: Alecia L. Craighead <Alecia.L.Craighead@tn.gov>
Sent: Friday, February 20, 2026 1:08 PM
To: Audra Allen <audra@serenitysurgicalrecovery.com>
Cc: Ann R. Reed <Ann.R.Reed@tn.gov>
Subject: RE: [EXTERNAL] Request for Classification Guidance – Serenity Surgical Recovery

Ms. Allen.

As mentioned on the phone, I do not believe what you are inquiring about will require a Certificate of Need. However, I am copying Ann Reed in the hopes she can help guide you on whether a license is required and which one.

Ann, If my interpretation is incorrect relating to Certificate of Need, please let me know so I can help guide her on that process.

Thank you.

Alecia



Alecia Craighead | Data and Analysis Administrator

Health Facilities Commission

Andrew Jackson State Office Building, 9th Floor

502 Deaderick Street, Nashville, TN 37243

p. 615-253-2782

c: 615.674.0370

alecia.l.craighead@tn.gov

www.tn.gov/hfc

From: Audra Allen <audra@serenitysurgicalrecovery.com>
Sent: Wednesday, February 18, 2026 10:37 AM
To: Alecia L. Craighead <Alecia.L.Craighead@tn.gov>
Subject: [EXTERNAL] Request for Classification Guidance – Serenity Surgical Recovery

Good Morning Ms. Craighead,

My name is Dr. Audra M. Allen, DNP, RN, and I am in the process of establishing a post-operative recovery service in Tennessee called Serenity Surgical Recovery. Before proceeding further with build-out or marketing, I would like clarification on how this type of service would be classified under Tennessee regulations.

Serenity Surgical Recovery will provide non-acute, short-term post-operative support for adult clients who have undergone elective cosmetic or plastic surgery procedures. Services would include:

- Post-operative monitoring (non-hospital level)
- Assistance with activities of daily living
- Medication reminders (no prescribing)
- Dressing changes and basic wound care
- Lymphatic massage (performed by appropriately trained personnel)
- Meal preparation and recovery support
- Transportation coordination (if applicable)

The intent is not to provide hospital-level care, skilled nursing facility services, or emergency medical treatment. Clients would be medically stable and discharged by their surgeon prior to admission to our service.

At this time, I am exploring two possible models:

1. A small, luxury recovery residence where clients stay short-term (1–5 days) after surgery.
2. A mobile/home-care model where services are provided in the client’s residence or hotel.

Could you please advise:

- Whether this type of service requires licensure under the Tennessee Health Facilities Commission
- If so, under what facility classification it would fall
- Or if it would instead be regulated under home care, personal support services, or another category

My goal is full compliance with Tennessee law prior to launch. I would appreciate any guidance, relevant statutes, or direction to the appropriate regulatory body.

Thank you for your time and assistance. I look forward to your guidance.

Respectfully,
Dr. Audra M. Allen, DNP, RN
Founder, Serenity Surgical Recovery
7068884650
audra@serenitysurgicalrecovery.com