January 13, 2026

VIA EMAIL
Logan Grant
Executive Director
Tennessee Health Facilities Commission
Andrew Jackson Building, 9th Floor
502 Deaderick Street
Nashville, TN 37243

RE: Heart and Soul Hospice, LLC, CN2511-041

This letter provides Caris Healthcare's formal opposition to the Certificate of Need application submitted by Heart and Soul Hospice, LLC seeking approval to initiate hospice services in Cannon, Clay, Cumberland, DeKalb, Fentress, Jackson, Macon, Overton, Pickett, Putnam, Smith, Trousdale and White Counties. Caris does not oppose the Heart & Soul application as to Cannon, Clay, DeKalb, Fentress, Jackson, Macon, Overton, Pickett, Smith, Trousdale and White Counties. Caris does oppose the approval of Heart & Soul's application as to Putnam and Cumberland Counties. As to those counties, the project fails to demonstrate need under the State Health Plan, it would not materially enhance access to care, and it would further undermine the availability of appropriate hospice staffing in those counties.

Caris is a hospice and palliative care provider licensed to provide hospice care in every county in Tennessee, along with areas of Virginia, Georgia, South Carolina, and Missouri. Since its founding in 2003, Caris' mission has been to deliver compassionate, high-quality end-of-life care, something it does for tens of thousands of patients and families every year across its operational footprint. Caris has received multiple recognitions for the quality of its care and satisfaction among patients, routinely exceeding national benchmarks.

Caris opposes the approval of an additional unneeded hospice provider in Putnam and Cumberland Counties. The Heart and Soul application relies on hospice utilization data for FY2022 and FY2023. However, these utilization data do not reflect the addition of two new hospice providers in Putnam and Cumberland counties over the past three years.

In 2023, Hospice of Chattanooga received a CON from the Commission to initiate hospice services in Putnam and Cumberland (along with other surrounding counties) and began first offering services in FY2024. In FY2025, Hospice of Chattanooga treated 176 patients in Putnam County and 22 patients in Cumberland County. In total, hospice utilization has grown in Putnam County from 410 patients in FY2023 to 610 patients in FY2025, a 49% increase. Similarly, hospice utilization has grown in Cumberland County from 468 patients in FY2023 to 662 patients in FY2025, a 42% increase.

Additionally, in May 2025, Quality Hospice was also approved by the Commission to expand its hospice services into Putnam and Cumberland Counties. So, the growth in nearly 400 additional patients served in these two communities since FY2023 does not factor into account that there is yet another new provider authorized to begin offering hospice services. It makes little health planning sense to approve a third new provider in Putnam and Cumberland Counties, given the massive growth in utilization over the past two years and without yet knowing what further impact that Quality may have in increasing hospice penetration.

Not only is a third new provider not needed, but hiring hospice staff in non-urban markets is particularly challenging due to a limited local workforce and longer travel distances between patients. The increased competition for qualified clinicians – especially in markets already saturated with hospice providers – will ultimately risk impacting both the quality of care and patient experience with providers that they have come to know and trust.

Caris appreciates the Commission's attention to this letter, and Caris respectfully requests that the Heart and Soul application be denied as to Putnam and Cumberland Counties.

Sincerely,

Michelle Stutz, Senior Vice President of Operations

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