

Opposition to Heart & Soul Hospice



CARIS

healthcare

Hospice: Your Life, Our Mission



Tennessee Hospice Provider for 25+ Years

Hospice Provider Throughout Service Area

“Superior Caregiver” Recognition

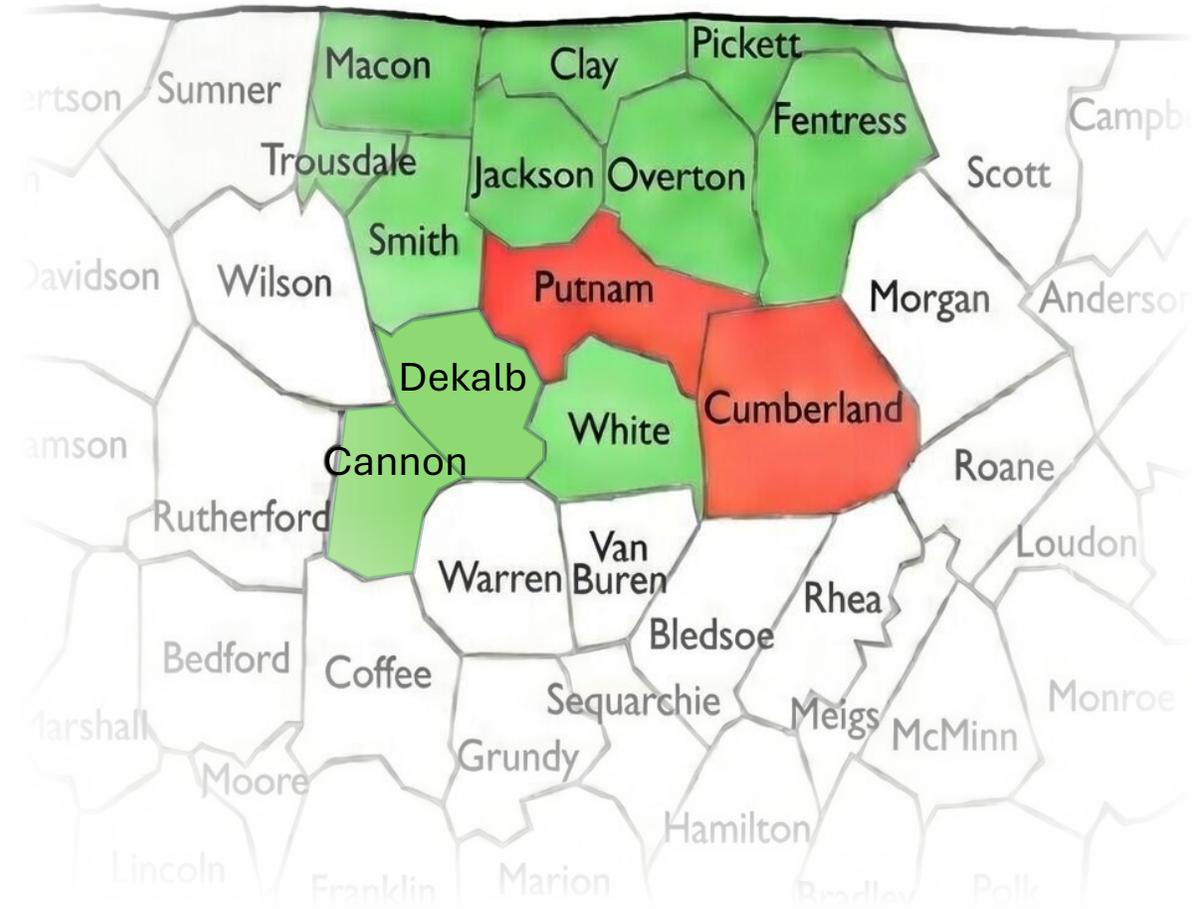
Perfect CMS Hospice Care Index Score

Proposed Service Area

Tenn Code Ann. 68-11-1609

“You can approve part or all of the application...”

You can disapprove part or all of the application...on grounds that the applicant has not affirmatively demonstrated that those parts of the proposal meet the applicable criteria.”





No Need In
**Cumberland or
Putnam Counties**

New Providers Already Approved

October 1, 2020

***Hospice of Chattanooga
Purchases Hospice in
Putnam County***

May 23, 2023

***Hospice of
Chattanooga
Approved to Serve
Cumberland County***

2020

2021

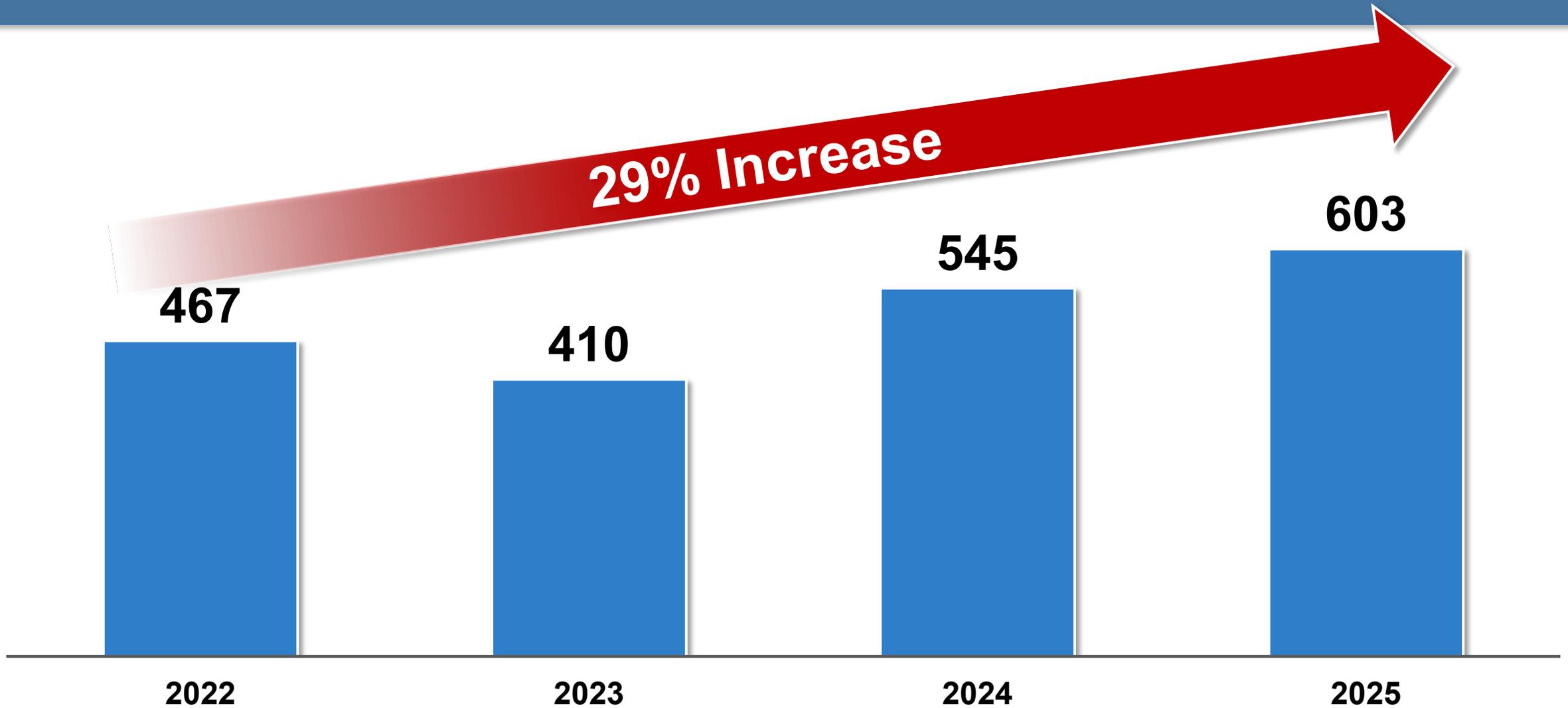
2022

2023

2024

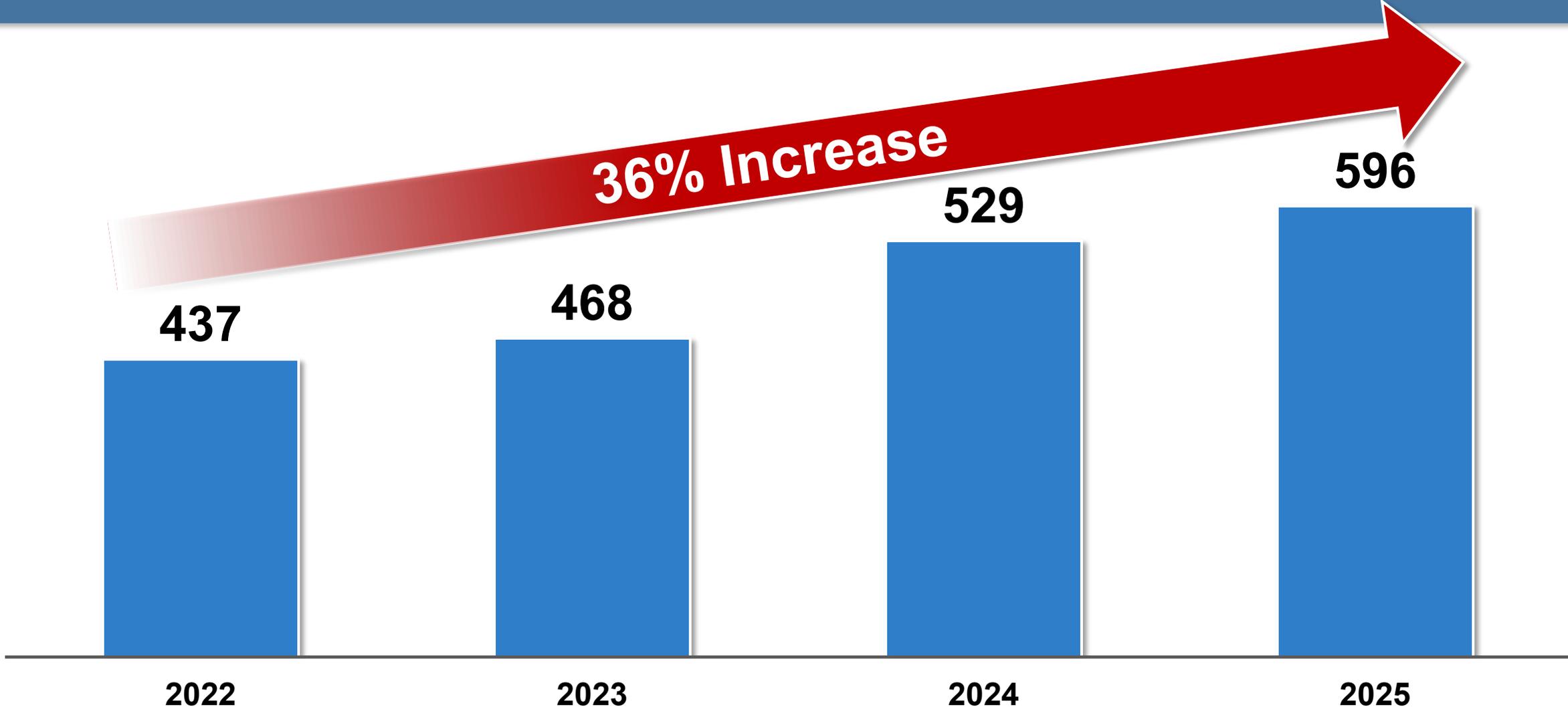
2025

Growth in Putnam County Utilization



Source: CON Application and JAR Hospice Data File for 2024 and 2025

Growth in Cumberland County Utilization



Source: CON Application and JAR Hospice Data File for 2024 and 2025

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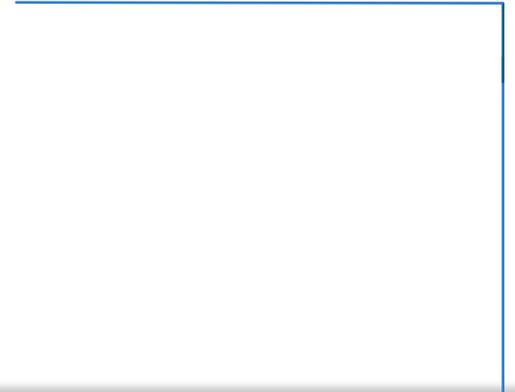
May 23, 2023

***Hospice of
Chattanooga
Approved to Serve
Cumberland County***



May 28, 2025

***Quality Hospice
Approved to Serve
Cumberland and
Putnam Counties***



2020

2021

2022

2023

2024

2025

Quality Hospice: Additional Patients Served

- The largest number of hospice patients were served in Anderson County in 2024 (1,245) followed by Roane County (611) and Putnam County (541).

Applicant's Historical and There is no historical utilization following table indicates the in Year 1 (2025).

Service Area County
Cumberland
Roane
Anderson
Putnam
Campbell
Total

Source: CN2408-022, Application, Page 11

- The applicant projects Cumberland County

Note to Commission members historical conversion rate it currently offers both services. However, the health services in one of the it is licensed to serve only for Cumberland County and on conversion rates being

Pr

Admissions	55	55
Average Length of Stay - ALOS (Days)		
Patient Days	6,985	7,314

Source: CN2408-022, Attachment 6N

- The applicant is projecting an average length of stay for patients of 55 days in Year 1 (2025) and Year 2 (2026).
- The applicant states that approximately 10% of its projected patients are expected to be served by its hospice agency alone, without having previously been served by its affiliate home health agency.

QUALITY HOSPICE
CN2408-022
MAY 28, 2025
Page 9

Projected Utilization - Quality Hospice

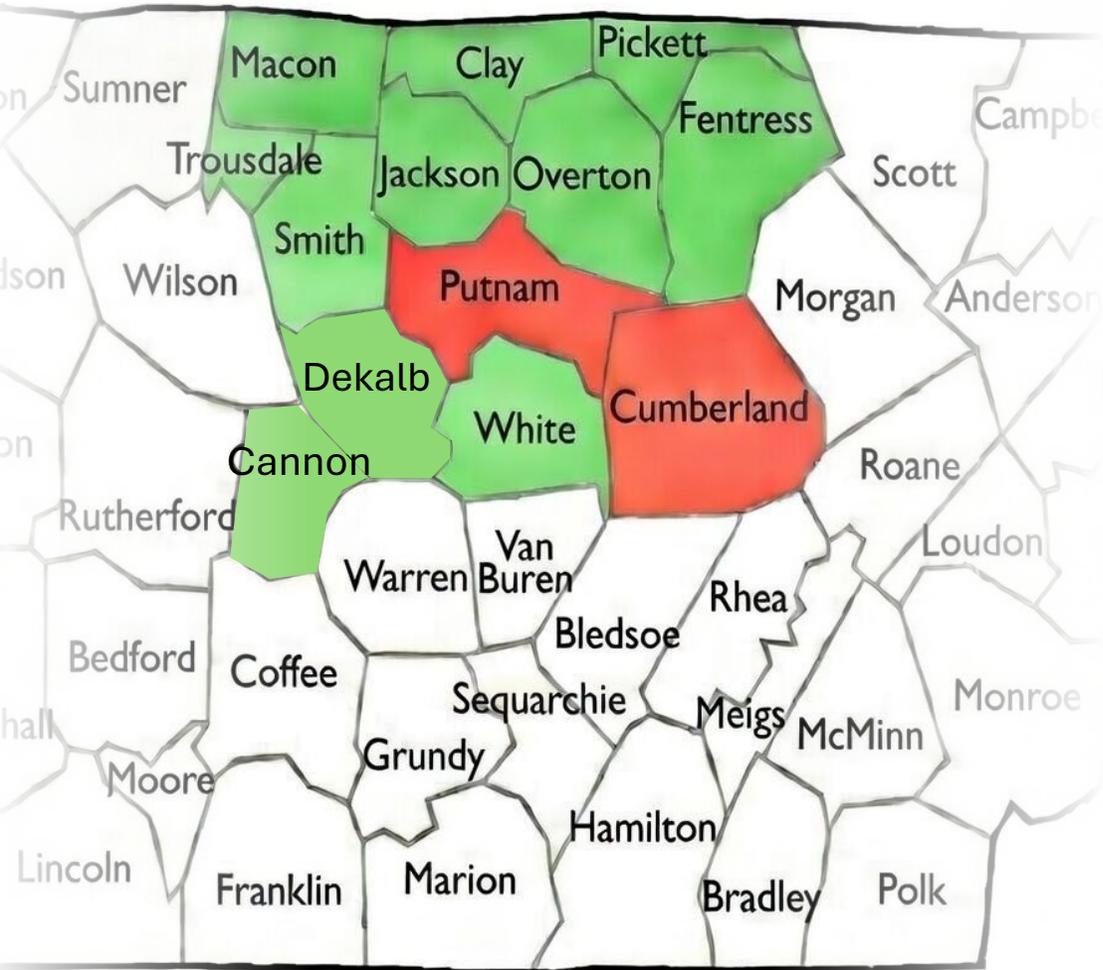
Service Area County	Projected Utilization Year 1 (2025)	Total Cases
Cumberland	51	40.2%
Roane	30	23.6%
Anderson	18	14.2%
Putnam	18	14.2%
Campbell	10	7.8%
Total	127	100%

Source: CN2408-022, Application, Page 11



No Consumer
Advantage: Already
*Ample Choice of Low
Cost Providers*

Existing Patient Choice



Existing Hospice Providers



Staffing Impact

Agreements

- The applicant does not list any proposed transfer agreements.

Staffing

The applicant's Year One proposed staffing includes the following:

	Year One
Direct Patient Care Positions	12.25
Non-Patient Care Positions	3.75
Contractual Staff	0.0
Total	16.0

Source: CN2511-041, Application, Page 26.

- Direct Care positions in Year One of the project include the following: Hospice Aide/Homemaker (4.0 FTEs); Nurse, RN Patient Care Manager (4.0 FTEs); Social Worker (1.25 FTE); LPN/Health Coordinator (0.75 FTE); Clinical Director / Assistant Director (0.5 FTE); Medical Director (0.25 FTE); Nurse Practitioner (0.25); Chaplain (0.75 FTE); and Bereavement Coordinator (0.5 FTE).
- Non-Patient Care positions include the following: Office Manager (1.0 FTE); Administrator (1.0 FTE); Receptionist (1.0 FTE); Volunteer Coordinator (0.5 FTE); and Nutritionist / Dietician (0.25 FTE).
- The applicant states that it will develop its recruitment strategy through a multi-pronged approach which includes developing partnerships with local educational institutions, hosting community-based hiring events at churches, community centers, local gathering places, and through online recruitment and use of job boards, social media, and professional nursing networks.
- The applicant states that it has successfully staffed a service area of 8 counties around the Tallahassee, FL region, which is comparable in size to the service area proposed for this project.
- The applicant states that it does not anticipate needing to use contracted specialists, but it has the staffing networks necessary should it become necessary.
- Please refer to Item 8Q on Page 26 and Attachment 1N, Criterion 1, Pages 4 - 6 of the application for additional details regarding project staffing.

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More Expensive Provider

2024 Comparison of Licensed Hospice Agencies in the Project Service Area Net Charge/Patient Day

Hospice Agency	State ID	2024 Patient Days	2024 Net Revenue	Net Charge (Net Revenue/Patient Days)
Hospice Compassus- The Highland Rim	16604	101,305	\$19,061,526	\$188
Alive Hospice	19624	142,350	\$24,766,940	\$174
All Care Plus dba Quality Hospice	25604	18,784	\$3,302,583	\$176
*Avalon Hospice	19694	667,639	\$66,938,991	\$100
**Kindred Hospice	19684	9,740	\$724,643	\$74
***Kindred Hospice	71604	24,519	\$2,407,667	\$98
Amedisys Hospice an Adventa Company	47602	405,687	\$38,628,189	\$95
Hospice of Cumberland County	18604	7,325	\$1,154,073	\$158
Covenant Homecare	47632	45,981	\$7,606,973	\$165
Univ. of TN Med. Ctr Home Health/Hospice Service	32603	73,907	\$9,330,940	\$126
Caris Healthcare	74624	18,437	\$2,881,475	\$156
Highpoint Hospice (TN In Home Partners II, LLC)	83614	44,591	\$4,794,868	\$108
Aveanna Hospice	94604	67,549	\$11,356,823	\$168
Home Health Care of East Tennessee, Inc.	06613	60,301	\$10,974,828	\$182
Amedisys Hospice Care Nashville	19604	15,207	\$1,274,768	\$84
Caris Healthcare LP Murfreesboro	75624	50,181	\$7,479,573	\$149
Hospice of Chattanooga Inc	33613	196,801	\$40,092,154	\$204
Heart and Soul Hospice, LLC	19744	22,989	\$3,877,584	\$169
Total		1,950,304	\$252,777,014	\$130

Source: CN2511-041, Application, Attachment 9C

The applicant's projected Net Revenue per Patient Day for Routine Home Care in Year One is higher (\$169) than all but five other providers in the service area

2024 Comparison of Medicare per Diem Rates by Level of Hospice Care					
Hospice Agency	State ID	Routine Hospice Care	Continuous Hospice Care	General Inpatient	Hospice Care
Hospice Compassus- The Highland Rim	16604	\$218	\$1,565	\$1,145	\$508
Alive Hospice	19624	\$193	\$1,368	\$1,016	\$452
All Care Plus dba Quality Hospice	25604	\$190	\$1,330	\$1,000	\$446
*Avalon Hospice	19694	\$193	\$1,368	\$1,016	\$452
**Kindred Hospice	19684	\$201	\$1,422	\$1,057	\$470
***Kindred Hospice	71604	\$183	\$1,296	\$970	\$432
Amedisys Hospice an Adventa Company	47602	\$154	\$500	\$1,000	\$419
Hospice of Cumberland County	18604	\$190	\$1,330	\$1,000	\$446
Covenant Homecare	47632	\$190	\$1,330	\$1,000	\$446
Univ. of TN Med. Ctr Home Health/Hospice Service	32603	\$159	\$500	\$1,000	\$431
Caris Healthcare	74624	\$201	\$1,422	\$1,057	\$470
Highpoint Hospice (TN In Home Partners II, LLC)	83614	\$170	\$500	\$867	\$423
Aveanna Hospice	94604	\$153	\$1,422	\$1,024	\$453
Home Health Care of East Tennessee, Inc.	06613	\$190	\$1,330	\$999	\$446
Amedisys Hospice Care Nashville	19604	\$168	\$500	\$959	\$443
Caris Healthcare LP Murfreesboro	75624	\$201	\$1,422	\$1,057	\$470
Hospice of Chattanooga Inc	33613	\$197	\$1,382	\$1,037	\$462
Heart and Soul Hospice, LLC	19744	\$201	\$1,422	\$1,057	\$470
Total		\$185	\$1,376	\$1,011	\$451

- The applicants' reported Medicare Per Diem Rates for Routine Home Care in Year One are higher (\$201) than reported per diem average of other area providers in 2024 (\$185). See Attachment 9C of the application for the above reference tables.

Project Payor Mix

Year 1	Percentage of Gross Operating Revenue					
	Medicare	Medicaid	Commercial	Self-Pay	Other	Charity Care
Year 1	82.5%	13.5%	3.0%	1.0%	0.0%	100%

Source: CN2511-041, Application, Page 22

- Please refer to Item 10C, in the Consumer Advantage section of the application for specific Payor Mix information.
- A full list of in-network payors is included in response to Item 2.C. on pages 16-17 of the application.
- The applicant states that it intends to contract with three Managed Care Organizations (MCOs) serving the area including Wellpoint, BlueCare, and UnitedHealthcare Community Plan. TennCare Select is not included by the applicant.

HEART AND SOUL HOSPICE, LLC
CN2511-041
JANUARY 28, 2026
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Application Should Be Partially Denied



***No Need* in *Cumberland* or *Putnam* Counties**



***No Consumer Advantage*: Already Ample Choice**



***No Consumer Advantage*: Staffing Impact**