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June 9, 2026

Logan Grant
Executive Director
Tennessee Health Facilities Commission
Andrew Jackson Building, 9th Floor
502 Deaderick Street
Nashville, Tennessee 37243
logan.grant@tn.gov

Re: **Opposition to Certificate of Need Application CN2603-007 — CLGLHealth LLC,
d/b/a homeRN Franklin**

Dear Mr. Grant:

On behalf of AccentCare Home Health of Nashville (“AccentCare”), we write pursuant to T.C.A. § 68-11-1607(b)(1) to oppose the Certificate of Need (“CON”) application of CLGLHealth LLC, d/b/a homeRN Franklin (“HomeRN Franklin” or “Applicant”), CN2603-007, which seeks to establish a new home health agency limited to skilled nursing only, private-pay only, in Williamson County. AccentCare is a licensed home health agency actively providing comprehensive home health services in Williamson County, serving 606 patients there in 2025. AccentCare respectfully requests that the Commission deny this application because it fails to satisfy the statutory criteria for approval, and the Commission should deny it accordingly.

1. The Application Fails to Demonstrate Need

Williamson County already has approximately 42 licensed home health agencies and 21 PSSAs. Under the State Health Plan 1.5% need formula, the county shows surplus capacity. The Applicant projects serving only 15 patients (330 hours) in Year 1 and 25 patients in Year 2. This is an extraordinarily small census that does not establish county-level need.

The Applicant itself notes that existing traditional home health agencies average only one self-pay patient per year. This confirms the private-pay market is exceedingly small, not that Williamson County has a broad access problem. HomeRN Franklin has served only approximately 40 total PSSA clients since June 2025, and its proposed home health model is new and untested.

HomeRN Franklin relies on population growth projections showing Williamson County will grow 282,758 in 2026 to 301,248 in 2029. This 6.5% increase is a future demographic point, not JAR-based proof of current unmet need. The Applicant has not documented failed referrals, waiting lists, or patients unable to access services.

The application relies on internal client history and referral assumptions rather than formal referral-source letters or documented failed referrals. AccentCare is specifically named in the application as a comparable provider; AccentCare already serves Williamson County at competitive rates (\$122–\$128/hour for skilled nursing, compared to the Applicant’s proposed \$125/hour) and can accommodate private-pay patients. The purported gap does not exist.

2. The Application Fails to Demonstrate That Quality Standards Will Be Met

In September 2025, the Applicant identified that certain client needs could be interpreted as requiring skilled nursing services and “immediately discontinued” those services. This raises questions about the Applicant’s prior scope of practice compliance and its understanding of the regulatory boundary between PSSA services and licensed home health care.

HomeRN Franklin has no home health quality data and no track record delivering licensed home health services. The Applicant proposes only one PA-C and one FTE RN, with no Medicare certification planned. This means that no CMS quality measures will ever be publicly reported. The Applicant plans to seek CHAP accreditation but has not obtained it. This minimal staffing and absence of quality oversight is inadequate for a new agency.

3. The Application Fails to Demonstrate Consumer Advantage

The project is 100% self-pay with \$0 Medicare, \$0 TennCare/Medicaid, and \$0 charity care. This model does not improve access for low-income, publicly insured, or Medicare patients. The consumer benefit extends only to affluent patients who can afford private-pay supplemental services.

A projected census of 15 patients per year in a county with 42 existing home health agencies is not a meaningful expansion of consumer choice. AccentCare and other existing providers already offer comparable skilled nursing services at comparable rates. The application does not demonstrate that consumers cannot access these services from current providers.

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4. Conclusion

For the foregoing reasons, AccentCare respectfully requests that the Commission deny Application CN2603-007. The Applicant has failed to demonstrate need, quality, or consumer advantage as required by T.C.A. § 68-11-1609(b). Representatives of AccentCare will be present at the Commission meeting to further present opposition.

Sincerely yours,

HOLLAND & KNIGHT LLP



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WT

cc: Graham Baker, Contact Person for Applicant (via email: graham@grahambaker.net)
Jim Christoffersen (via email: jim.christoffersen@tn.gov)
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