

# Holland & Knight

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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](mailto:logan.grant@tn.gov)

Re: **Opposition to Certificate of Need Application CN2603-008 — AMA Home Care Services LLC, d/b/a homeRN Nashville**

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 AMA Home Care Services LLC, d/b/a homeRN Nashville (“HomeRN Nashville” or “Applicant”), CN2603-008, which seeks to establish a new home health agency limited to skilled nursing only, private-pay only, in Davidson County. AccentCare is a licensed home health agency actively providing comprehensive home health services in Davidson County, serving 705 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**

Davidson County already has approximately 20 licensed home health agencies and 50 to 70 PSSAs. Under the State Health Plan 1.5% need formula, the county shows surplus capacity. The Applicant projects serving only 30 patients in Year 1, which is an exceedingly small census that does not establish countywide need for another licensed agency.

HomeRN Nashville relies on population growth projections showing Davidson County will grow from 734,808 in 2026 to 755,634 in 2029. This is a mere 2.8% increase. This 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 Applicant's own data undercuts its claims: it reports approximately 40 to 60 PSSA clients, of whom only 20 to 30% could benefit from skilled nursing, and 65 to 70% of that subgroup already uses a licensed home health agency. This confirms that existing providers are meeting community needs.

HomeRN Nashville has not established formal referral arrangements or written working agreements with hospitals or healthcare providers. Its referral sources consist of Google searches, PSSA companies, care navigators, and word of mouth, not the type of institutional documentation that would demonstrate unmet need. Medicare-certified agencies like AccentCare can and do accommodate private-pay patients when needed.

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

HomeRN Nashville had not yet received its PSSA license at the time of application. Additionally, the Applicant admitted it had previously been providing skilled nursing services and stopped only when advised a home health license was required. This raises compliance concerns.

The Applicant has no home health quality data, plans only three FTEs (owner/NP, one RN, and Medical Director), and will not participate in Medicare. Without Medicare certification, no CMS quality measures will ever be publicly reported. The Applicant plans to seek CHAP accreditation but has not obtained it. This limited staffing and lack of quality oversight is insufficient for a new licensed 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 any of the populations most likely to face access barriers, including low-income, publicly insured, or Medicare patients. The consumer benefit is limited to affluent patients who can afford out-of-pocket services.

A projected census of 30 patients per year in a county with 20 or more existing home health agencies does not represent a meaningful expansion of consumer choice. The described gaps, including scheduling flexibility and continuity preferences, are service-level preferences that existing providers can address, not deficiencies warranting a new CON.

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#### **4. Conclusion**

For the foregoing reasons, AccentCare respectfully requests that the Commission deny Application CN2603-008. 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**



Wells Trompeter

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