



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
Olympia, Washington 98504

May 11, 2018

CERTIFIED MAIL # 7014 2120 0002 7590 6761

Michael Rogers
EmpRes Healthcare Management
4601 NE 77th Avenue #300
Vancouver, WA 98662

RE: CN 18-02

Dear Mr. Rogers:

We have completed review of the Certificate of Need application submitted by Eden Home Health of King County, LLC proposing to establish a Medicare and Medicaid certified home health agency in King County. Enclosed is a written evaluation of the application.

For the reasons stated in the enclosed decision, the application is consistent with the applicable criteria of the Certificate of Need Program, provided Eden Home Health of King County, LLC agrees to the following in its entirety.

Project Description:

This Certificate of Need approves Eden Home Health of King County, LLC to establish a Medicare and Medicaid certified home health agency in Seattle to serve the residents of King County. Eden Home Health of King County, LLC will provide in-home skilled nursing, physical therapy, occupational therapy, speech therapy, medical social work, and home health aide services.

Conditions:

1. Approval of the project description as stated above. Eden Home Health of King County, LLC further agrees that any change to the project as described in the project description is a new project that requires a new Certificate of Need.
2. Eden Home Health of King County, LLC will provide charity care in compliance with its charity care policies provided in the application.
3. Eden Home Health of King County, LLC will maintain Medicare and Medicaid certification regardless of ownership.

4. Prior to providing Medicare and Medicaid home health services in King County, Eden Home Health shall provide the Certificate of Need Program with a copy of the executed "Directorship Independent Contractor Agreement." The executed agreement shall be consistent with the draft agreement provided in the application.
5. Prior to providing services, Eden Home Health of King County, LLC will provide copies of the fiscal intermediary forms as stated on page 32 of the application for the department's review and approval. The fiscal intermediary forms must be consistent with the forms Eden Home Health of King County, LLC provided to National Government Services.

Approved Costs:

The approved capital expenditure associated with this project is \$33,700.

Please notify the Department of Health within 20 days of the date of this letter whether you accept the above project description, conditions, and capital costs for your project. If you accept these in entirety, your application will be approved and a Certificate of Need sent to you.

If you reject any of the above provision, your application will be denied. The department will send you a letter denying your application and provide you information regarding your appeal rights. Your written response should be sent to the Certificate of Need Program, at one of the following addresses.

Mailing Address:

Department of Health
Certificate of Need Program
Mail Stop 47852
Olympia, WA 98504-7852

Physical Address:

Department of Health
Certificate of Need Program
111 Israel Road SE
Tumwater, WA 98501

If you have any questions, or would like to arrange for a meeting to discuss our decision, please contact Janis Sigman with the Certificate of Need Program at (360) 236-2955.

Sincerely,



Nancy Tyson, Executive Director
Health Facilities and Certificate of Need
Community Health Systems

Enclosure

EVALUATION DATED MAY 11, 2018, FOR THE CERTIFICATE OF NEED APPLICATION SUBMITTED BY EDEN HOME HEALTH OF KING COUNTY, LLC PROPOSING TO ESTABLISH A MEDICARE AND MEDICAID CERTIFIED HOME HEALTH AGENCY TO SERVE KING COUNTY

APPLICANT DESCRIPTION

Eden Home Health, LLC is the applicant for this project. Eden Home Health, LLC is a division of EmpRes Healthcare Group Inc.

EmpRes Healthcare Group, Inc. is an employee stock ownership trust company under the trust company EmpRes Healthcare Group, Inc. EmpRes Healthcare Group manages, owns or operates eight EmpRes Healthcare, LLCs in California, Idaho, Montana, Nevada, Oregon, Washington and Wyoming. These eight EmpRes Healthcare, LLCs operate skilled nursing and assisted living facilities. Under the EmpRes Healthcare Group, Inc. is EmpRes Home and Hospice, LLC, and under this entity is a division known as EmpRes Home Health, LLC which operates home health and home care services under the brand named Eden Home Health. Two other entities owned or operated by EmpRes Healthcare Group are EmpRes Financial Services, LLC and EmpRes Healthcare Management, LLC. The former entity provides financial and consulting services; the latter entity provides management services. [Source: Application pages 1-3, and Appendix B and empres.com]

In Washington State, EmpRes Healthcare Group, Inc. manages or owns EmpRes Washington Healthcare, LLC. This entity manages or operates 19 skilled nursing facilities and 3 assisted living facilities. In 2014, the Eden Home Health division acquired Option Care Enterprise, a Medicare and Medicaid certified home health agency located in Whatcom County. For this application, Eden Home Health of King County, LLC is the applicant and will be referenced in this evaluation as “Eden Home Health.” [Source: Application pages 1-3, and Appendix B and empres.com]

PROJECT DESCRIPTION

Eden Home Health proposes to establish a Medicare and Medicaid certified home health agency to serve the residents of King County. The agency would be located at the Seafirst Avenue Plaza 800 Fifth Avenue, Suite 4100, Seattle, [98104]. Services to be provided by Eden Home Health would include in-home skilled nursing, physical therapy, occupational therapy, speech therapy, medical social work, and home health aide services. [Source: Application, page 4 and Screening responses received October 6, 2017, page 2]

Eden Home Health expects to begin providing Medicare and Medicaid home health services to King County residents in April 2018. [Source: Screening responses received September 12, 2017, page 2]

The estimated capital expenditure for the project is \$33,700. Of that amount 59% is associated with network telemedicine and phone equipment and the remaining 41% is associated with computer equipment. [Source: Application, page 30 and Appendix L]

APPLICABILITY OF CERTIFICATE OF NEED LAW

This application is subject to review as the construction, development, or other establishment of new health care facility under Revised Code of Washington (RCW) 70.38.105(4)(a) and Washington Administrative Code 246-310-020(1)(a).

EVALUATION CRITERIA

WAC 246-310-200(1)(a)-(d) identifies the four determinations that the department must make for each application. WAC 246-310-200(2) provides additional direction in how the department is to make its determinations. It states:

“Criteria contained in this section and in WAC 246-310-210, 246-310-220, 246-310-230, and 246-310-240 shall be used by the department in making the required determinations.

- (a) In the use of criteria for making the required determinations the department shall consider:*
 - (i) The consistency of the proposed project with service or facility standards contained in this chapter;*
 - (ii) In the event the standards contained in this chapter do not address in sufficient detail for a required determination the services or facilities for health services proposed, the department may consider standards not in conflict with those standards in accordance with subsection (2)(b) of this section; and*
 - (iii) The relationship of the proposed project to the long-range plan (if any) of the person proposing the project”*

In the event that WAC 246-310 does not contain service or facility standards in sufficient detail to make the required determinations, WAC 246-310-200(2)(b) identifies the types of standards the department may consider in making its required determinations. Specifically WAC 246-310-200(2)(b) states:

- (b) “The department may consider any of the following in its use of criteria for making the required determinations:*
 - (i) Nationally recognized standards from professional organizations;*
 - (ii) Standards developed by professional organizations in Washington State;*
 - (iii) Federal Medicare and Medicaid certification requirements;*
 - (iv) State licensing requirements;*
 - (v) Applicable standards developed by other individuals, groups, or organizations with recognized expertise related to a proposed undertaking; and*
 - (vi) The written findings and recommendations of individuals, groups, or organizations with recognized experience related to a proposed undertaking, with whom the department consults during the review of an application.”*

To obtain Certificate of Need approval, the applicant must demonstrate compliance with the criteria found in WAC 246-310-210 (need) including applicable portions of the 1987 State Health Plan; 246-310-220 (financial feasibility); 246-310-230 (structure and process of care); 246-310-240 (cost containment).

TYPE OF REVIEW

This application was reviewed under the regular review timeline outlined in WAC 246-310-160, which is summarized below.

APPLICATION CHRONOLOGY

Action	Date
Letter of Intent Submitted	May 31, 2017
Application Submitted	July 24, 2017
Department’s pre-review activities <ul style="list-style-type: none"> • DOH 1st Screening Letter • Applicant’s Responses Received • DOH 2nd Screening Letter • Applicant’s Responses Received • Applicant’s Supplemental Responses Received 	August 14, 2017 September 12, 2017 October 3, 2017 October 6, 2017 October 11, 2017
Beginning of Review	October 13, 2017
Public Hearing Conducted	N/A
Public Comments accepted through end of public comment	November 27, 2017
Rebuttal Comments Due	December 12, 2017
Department’s Anticipated Decision Date	January 25, 2018
Department’s Actual Decision Date	May 11, 2018

AFFECTED PERSONS

Washington Administrative Code 246-310-010(2) defines “affected person” as:

“...an “interested person” who:

- (a) Is located or resides in the applicant's health service area;
- (b) Testified at a public hearing or submitted written evidence; and
- (c) Requested in writing to be informed of the department's decision.”

As noted above, WAC 246-310-010(2) requires an affected person to first meet the definition of an ‘interested person.’ WAC 246-310-010(34) defines “interested person” as:

- (a) The applicant;
- (b) Health care facilities and health maintenance organizations providing services similar to the services under review and located in the health service area;
- (c) Third-party payers reimbursing health care facilities in the health service area;
- (d) Any agency establishing rates for health care facilities and health maintenance organizations in the health service area where the proposed project is to be located;
- (e) Health care facilities and health maintenance organizations which, in the twelve months prior to receipt of the application, have submitted a letter of intent to provide similar services in the same planning area;
- (f) Any person residing within the geographic area to be served by the applicant; and
- (g) Any person regularly using health care facilities within the geographic area to be served by the applicant.

For this project, Providence Health and Services and Health Facilities Planning and Development sought interested person status.

Providence Health and Services

Providence Health and Services (Providence), requested interested person status. Providence Health and Services owns and operates Providence Home Services in Tukwila, Washington. Providence Home Services provides Medicare and Medicaid home health services in King County. This qualifies Providence as an interested person under WAC 246-310-010(34)(b). Providence did not provide comments related to this project, and therefore does not qualify as an affected person for this project.

Health Facilities Planning and Development

Health Facilities Planning and Development is a healthcare consultation entity located in King County. It is hired by some applicants to prepare and submit Certificate of Need letters of intent and applications on their behalf. Health Facilities Planning and Development requested to receive copies of all correspondence related to this application. Health Facilities Planning and Development does not meet any of the criteria under WAC 246-310-010(34) and therefore cannot qualify as an interested person. Health Facilities Planning and Development did not provide comments related to this project. Health Facilities Planning and Development does not qualify as an interested person or affected person for this project.

Therefore, there are no affected persons for this project.

SOURCE INFORMATION REVIEWED

- Eden Home Health of King County, LLC's Certificate of Need application submitted July 24, 2017
- Eden Home Health of King County, LLC's screening responses received September 12, 2017 and October 6, 2017
- Compliance history for credentialed or licensed staff from the Medical Quality Assurance Commission and Nursing Quality Assurance Commission
- Compliance history for Eden Home Care Bellingham from the Washington State Department of Health – Office of Investigation and Inspection
- DOH Provider Credential Search website: <http://www.doh.wa.gov/pcs>
- Year 2012 OFM population estimates, medium series
- Department of Health internal database – Integrated Licensing & Regulatory Systems (ILRS)
- EmpRes Healthcare Group, Inc. website: <http://www.empres.com/>
- Washington Secretary of State website: <http://www.sos.wa.gov/corps/>
- Nursing Home Compare: <https://www.medicare.gov/nursinghomecompare/search.html>
- Certificate of Need historical files

CONCLUSIONS

For the reasons stated in this evaluation, the application submitted by Eden Home Health of King County, LLC proposing to establish a Medicare and Medicaid certified home health agency in Seattle to serve the residents of King County is consistent with applicable criteria of the Certificate of Need Program, provided Eden Home Health of King County, LLC agrees to the following in its entirety.

Project Description:

This Certificate of Need approves Eden Home Health of King County, LLC to establish a Medicare and Medicaid certified home health agency in Seattle to serve the residents of King County. Eden Home

Health of King County, LLC will provide in-home skilled nursing, physical therapy, occupational therapy, speech therapy, medical social work, and home health aide services.

Conditions:

1. Approval of the project description as stated above. Eden Home Health of King County, LLC further agrees that any change to the project as described in the project description is a new project that requires a new Certificate of Need.
2. Eden Home Health of King County, LLC will provide charity care in compliance with its charity care policies provided in the application.
3. Eden Home Health of King County, LLC will maintain Medicare and Medicaid certification regardless of ownership.
4. Prior to providing Medicare and Medicaid home health services in King County, Eden Home Health shall provide the Certificate of Need Program with a copy of the executed "Directorship Independent Contractor Agreement." The executed agreement shall be consistent with the draft agreement provided in the application, which includes the "Business Associate Agreement."
5. Prior to providing services, Eden Home Health of King County, LLC will provide copies of the fiscal intermediary forms as stated on page 32 of the application for the department's review and approval. The fiscal intermediary forms must be consistent with the forms Eden Home Health of King County, LLC provided to National Government Services

Approved Costs:

The approved capital expenditure associated with this project is \$33,700.

CRITERIA DETERMINATIONS

A. Need (WAC 246-310-210)

Based on the source information reviewed and agreement to the conditions identified in the conclusion section of this evaluation, the department determines that Eden Home Health of King County, LLC project **met** the applicable need criteria in WAC 246-310-210.

(1) *The population served or to be served has need for the project and other services and facilities of the type proposed are not or will not be sufficiently available or accessible to meet that need.*

WAC 246-310 does not contain specific WAC 246-310-210(1) need criteria as identified in WAC 246-310-200(2)(a)(i). To assist with the determination of numeric need for home health agencies, the department uses the numeric methodology contained in the 1987 Washington State Health Plan (SHP).

Home Health Numeric Methodology-1987 State Health Plan

The 1987 State Health Plan contains a numeric need methodology to project need for additional home health services in a planning area. This methodology uses the following data elements to establish the expected number of home health visits in a planning area:

Age Cohort Population		Use Rate by Age Group		Number of Expected Visits ¹ by Age Group	=	Expected Number of Home Health Visits
Ages 0-64	*	0.5%	*	10		?
Ages 65-79		4.4%		14		
Ages 80+		18.3%		21		

The total projected number of visits is then divided by 10,000, which is considered the ‘target minimum operating volume’ for a home health agency. The resulting number represents the maximum projected number of agencies needed in a planning area. The SHP states that fractions should be rounded down to the nearest whole number. [Source: SHP, Page B-35]

The final step in the numeric methodology is to subtract the existing number of home health agencies in a planning area from the projected number of agencies needed. This results in the net number of agencies needed for the planning area.

Eden Home Health

Eden Home Health provided a numeric need methodology based on the five steps identified in the SHP and concluded a gross need for 49 home health agencies in King County in the year 2020.

“As the 1987 State Health Plan Need Estimate method shows, the King County target population for home health services is expanding rapidly. Taking Eden Home Health of King County, LLC’s 2017 application year as a baseline, the SHP Need Estimate shows a growth in need between 2016 and 2020 of 26,898 home health visits. In the SHP method, this additional demand for care is driven by a combination of overall King County population growth and by the baby boom generation moving into the 65-79 age cohort. That demographic trend itself shows a 15% population increase in the population of that age cohort, 2017-2020, compared to the overall population growth of 2.8% in the same 4-year period.

¹ Per Home Health episode of care

This analysis shows that, even if all SHP need were being met in 2017, 27,000 additional visits would be needed by 2020, this growth alone would support over two new agencies.” [source: Application p18]

“DOH provides an inventory of 70 agencies that may be currently serving King County, but the 1987 SHP numeric method calls for a total of only 49 agencies in 2020. If all 70 agencies were counted as “existing similar providers” in the numeric need method, it could take 20 years before another Medicare-certified agency could be establish in King County. In the meantime, the licensed-only agencies not covered by insurance are not as financially accessible as those CON-approved agencies for which most patients have insurance coverage. For that reason, approval of a new Medicare-certified agency should not be considered as unnecessary duplication of exiting “licensed-only” service that are not financially accessible, especially to the elderly and disadvantaged populations”. [Source: Application page 11-12]

Eden Home Health categorized the existing providers serving King County as follows, with rationale for inclusion or exclusion from the numeric need methodology. A more detailed excerpt from the application that follows each of the seventy facilities is attached to this evaluation as Appendix A.

<i>Provider Category</i>	<i>Count</i>
<i>A. Agency does not offer any services in King</i>	<i>17</i>
<i>B. Offers services in King County but not nursing</i>	<i>9</i>
<i>C. Offers nursing in King County but not home health aide or other service</i>	<i>14</i>
<i>D. Meets most SHP criteria for HHA in King County</i>	<i>4</i>
<i>E. Not CON-approved but meets SHP Criteria</i>	<i>9</i>
<i>F. CON-approved for HHA in King</i>	<i>17</i>
<i>TOTAL from DOH Inventory</i>	<i>70</i>

Note related to this table are shown below:

- 1) Twenty-six agencies are licensed-only and either do not appear to offer any services in King County (Category A) or appear to offer some services in King county but do not provide nursing services there (Category B). Upon review of these agencies’ websites, they cannot be considered to offer home health services in King County*
- 2) Fourteen other agencies offer nursing services to King patients but do not provide either home health or another service. By not providing one of these other services, these agencies do not meet the 1987 SHP method and standards required for them to be included in the county’s existing count of “home health services” (Category C)*
- 3) Twelve “licensed only” agencies that are not Medicare-certified to serve King patients with home health services either meet most of the SHP standards for a HHA (Category D) or appear to meet all of the standards set by the 1987 SHP (Category E)*
- 4) Seventeen Medicare-certified home health agencies are CON-approved to provide home health services in King, Pierce or Snohomish County. Those CON-approved only for Pierce or Snohomish may meet the 1987 SHP HHA standards to be counted in home health capacity in King County. [source: Application pp21-27]*

Public Comment

On August 25, 2017 the department mailed provider utilization surveys to the home health agencies located in King County or known to provide home health services to the residents of King County². In response to the survey, the department received responses from seven Medicare and Medicaid certified home health agencies.³ The department also received responses from four providers who do not provide similar type services proposed by the applicant⁴. Some of the survey responses received by the department includes comments and those comments are summary below.

Envision Home Health of Washington, LLC

"Envision HH has continued to provide services to patients within 24-48 hrs, meeting the Medicare Regulations. With the closing of Highline Home Health, we have continued to increase our staffing model to meet continued home health referrals needs. In addition, we have additional capacity to accept new referrals and provide SOC within 24.48 hrs". [Source: Survey response received September 25, 2017]

Evergreen Health Home Care Services

"Quality of patients care has not improved through market saturation of for-profit agencies. Providing excellent patient care is very expensive and for profit organizations stress the market through non-compliance practices and accepting only profitable Medicare patients. I am strongly against allowing yet another agency to enter the market and practice the wrong type of home health. When profit are only 5% and for-profit demand 15% bottom line, care is worse and nurses and other professionals are under paid." [Source: Survey response received September 12, 2017]

Kindred at Home/Gentiva Health Services

"We fully oppose the addition of more home health providers in King County. We have many weeks where our clinical staff do not meet productivity due to lack of patient volume. Adding more agencies put us at risk for not meeting budget and will be harmful to our business." [Source: Survey response received September 8, 2017]

The department also received the following comments from nursing providers in King County:

Advanced Post-Acute (formerly Regency Auburn)

"I have worked at the Advanced Post-Acute, formerly Regency Auburn, for the last 4 years as the Executive Director. In the last 12- 15 months, we have seen a steady decline in home health agencies able to accommodate many of our discharges in a timely manner, for various reasons. One obstacle for our facility in particular, is the fact that we work with several different insurance companies. Depending on the residents insurance, several companies will not contract with them and the ones that are contracted are often not able to get into a residents home for several days, which is just not sufficient in most cases."

² The department sent utilization survey to 72 providers located in King County or know to provide home health services to the residents of King County. Of the 72 surveys that were mailed to King County providers, the department received 11 responses.

³ Brookdale Home Health, Envision Home Health of Washington, LLC, Evergreen Health Home Care Services, Harvard Partners, Kindred/Gentiva; SeaMar, and Wesley Homes Community Health Services.

⁴ Community Home Health & Hospice, Critical Nurse Staffing, Inc., Comfort Keeper and Amicable Health.

We firmly believe that there is a great need for additional home health resources in King County, which is why I am writing this letter in support of Eden Home Health's application to add to the home health agencies in King County. We serve a very diverse population with countless types of need, from surgical aftercare, to continue strengthening and endurance as they transition back home. Our facility alone could refer 1-2 people per week to Eden if it were approved within King County."

Enumclaw Health and Rehabilitation Center

"Our facility is licensed for 92 beds. Our resident population is roughly two-thirds long-term care and one-third short-term care where the residents get their rehabilitation and go back out into the community. A high percentage of those residents discharging back to the community require home health in order for them to be successful in the community.

Unfortunately we find since these communities we serve are at too much of a distance from urban communities, we are limited to services those we serve require. These services include Ambulance and non-emergency transport, mental health, and home health services.

I am writing today to support Eden Home Health's application for a Certificate of Need to establish a Medicare-certified home health agency to serve King County. We have few home health agencies that will serve our population this far south and most that do struggle to meet the timely needs of our residents. These struggles include just responding or following up to our requests, delay in assessing or accepting residents, delay in implementing home health once accepted (up to 5 to 7 days), having enough staff to visit residents, and being too particular in which residents they will accept.

If Eden Home Health is approved we anticipate we would refer patients to them. We are required to give residents choices in Home Health Agencies, which we do, but currently only have one Agency that is consistently responsive. We refer two or three residents to Home Health a week. We would support having another Home Health Agency that would benefit our residents."

Health and Rehabilitation of North Seattle

"If Eden Home Health were approved I would likely be able to discharge 2 residents per week, which would be about 104 residents per year."

Seattle Medical Post-Acute Care

"Eden Home Health would greatly benefit Seattle Medical Post-Acute Care because of the residents we would refer. Have a high acute respiratory floor, many of our residents require many hours of service that many home health agency cannot accommodate. We would refer about 25 residents a year to Eden Home Health agency, all of which would need many hours of home care because of their high acuity."

Talbot Center for Rehabilitation and Healthcare

"Home health services are especially vital for our short-term rehab residents, as their goal is to return to their home and the access to quality home health services can make all the difference in their being able to reach that goal. Currently, home health agencies we work with have some challenges meeting the needs of the patients. Long waits to arrange for services, lack of appropriate follow-up, issues we face with some home health providers.

Talbot Center makes several referrals to home health agencies each week which makes access to quality home health essential. Our residents we discharge home with services deserve to receive those services timely and appropriately. I believe that Eden Home Health, if granted the Certificate of Need, will be able to assist us in our efforts to deliver quality care and service to the people we serve."

Rebuttal

In response to the comments within the home health agencies provider's surveys received by the department, Eden Home Health provided the following rebuttal, categorized by provider commenter:

Envision Home Health of King County LLC

"Envision points out that Highline Home Health has closed. This closure needs to be reflected in the Department's calculation of existing supply when it determines the need for additional King County home health agencies in 2021. Envision also states that it has additional capacity but it does not provide a quantity for use in the Department's calculations". [Source: Eden Home Health rebuttal comment received December 12, 2017, page 2-3]

Harvard Partners

"Harvard Partners did not provide narrative comments with its survey. Its Payer Source response indicates however, that it does not serve Medicaid patients. One must question whether a Medicare-certified agency that does not serve Medicaid patients should be counted as a provider of "similar services" to those agencies who serve both Medicare and Medicaid". [Source: Eden Home Health rebuttal comment received December 12, 2017, page 2-3]

Evergreen Home Health Care Services.

"Evergreen makes numerous disparaging and unsubstantiated remarks about the existing "for profit" home health agencies in King County. As a 100% employee-owned company, EmpRes Healthcare Group, Inc. and its subsidiary Eden Home Health of King County, LLC object to the blanket and uninformed characterizations made by Evergreen. Evergreen states it could have provided detail if it had time. Yet, the Certificate of Need process allowed Evergreen nearly two months for public comment beyond the time allowed for Evergreen's survey response. Evergreen's comments are unfortunate and inflammatory coming from an official of a publicly-owned hospital district with locally elected commissioners.

Furthermore, it is surprising that, as one of the largest home health agencies in the state, Evergreen cannot report firm numbers for admissions or visits serving King County residents in 2016. Provided as estimates and not solid volume numbers the Evergreen figures cannot be used by the Department to make an accurate determination of exist in g capacity in King County". [Source: Eden Home Health rebuttal comment received December 12, 2017, page 2-3]

Kindred at Home

"Kindred at Home expresses a general concern that new providers will be harmful to its business. While not offering any data supporting its claim, Kindred's survey response shows that it has over one third of the entire King County market. With that large a market share, Kindred's problems with staffing and productivity are likely not ones that the Certificate of Need

Program can solve by denying new entrants”. [Source: Eden Home Health rebuttal comment received December 12, 2017, page 2-3]

Department’s Numeric Methodology and Evaluation

Based on the department’s internal database⁵ and historical records 68⁶ agencies claim to provide home health services in King County. Table 1 shows a listing of the 68 agencies. The bold highlighted home health agencies in the table are Medicare and Medicaid certified agencies either located in King County or provide services to the residents of the county those agencies are counted in the department methodology.

**Table 1
Agencies Licensed to Serve King County**

Agency Name	Location City	Location County
ADMA Healthcare, Inc.	SeaTac	King
Advanced Health Care	Tacoma	Pierce
Andelcare	Bellevue	King
Advisacare	Seattle	King
Alliance Nursing	Tacoma	Pierce
American Healthcare Services	Seattle	King
Amicable Health Care	SeaTac	King
Assured Home Health	Federal Way	King
Beam	Bellevue	King
Brookdale Home Health, LLC	Federal Way	King
Brookdale Home Seattle	Seattle	King
Care Force	Seattle	King
Careage Home Health	Renton	King
Catherine Dambrosio PHD RN and Associates, LLC	Seattle	King
Chesterfield Health Services	Seattle	King
Children Country Home	Woodinville	King
CHI Franciscan Health at Home	University Place	Pierce
Conscious Home Health Care	Seattle	King
Comfort Keepers	Federal Way	King
Divine Home Health Care	Renton	King
EKL Health	Woodinville	King
Elite Nursing	Seattle	King
Envision Home Health	Burien	King
Estelita Su Homecare	Seattle	King
Evergreen Health	Kirkland	King
Family Resource Home Care	Seattle	King
Fedelta Care Solutions	Seattle	King
Kaiser Permanente	Federal Way	King

⁵ Integrated Licensing and Regulatory System (ILRS).

⁶ At the time data was requested by Eden Home Health, the existing supply was 70 agencies. Between the time of their data request and the preparation of this evaluation, a net loss of two agencies occurred.

Agency Name	Location City	Location County
Harvard Partners	Seattle	King
Health People	Bellevue	King
Home Angels	Seattle	King
J and J Integrity Home Health Care, LLC	Lynnwood	Snohomish
Jewish Family Services	Seattle	King
Judson park	Seattle	King
Kays Home Health Services	Auburn	King
Kindred at Home	Bellevue	King
Kindred at Home	Renton	King
Kindred at Home	Tacoma	Pierce
Kline Galland Community Based Services	Seattle	King
Millennia Healthcare	SeaTac	King
MultiCare Home Health Hospice, and Palliative Care	Tacoma	Pierce
New Care Concepts	Seattle	King
Nogah Home Care	Seattle	King
Personal Best Services, LLC	Seattle	King
Proactive HomeCare	Seattle	King
Providence Elder Place	Seattle	King
Providence Home Care Services.	Tukwila	King
Providence Hospice and Home Care of Snohomish	Everett	Snohomish
PSA Healthcare	Seattle	King
Rainier Home Health	Seattle	King
Rehab Without Walls	Seattle	King
ResCare HomeCare	Lynnwood	King
Restoration Home Health Services	Federal Way	King
Right at home	Seattle	King
Riverstone HomeCare Riverstone Healthcare	Bellevue	King
Ro Health	Seattle	King
SeaMar Community Health Center	Seattle	King
Serengeti Home Care	Renton	King
Signature Home Health	Federal Way	King
Signature Home Health	Bellevue	King
Sound Health Medical Supply	Tacoma	King
Sunup Home Care	Sammamish	King
Tacoma Lutheran Support Services	Tacoma	Pierce
Unicare, LLC	Lakewood	Snohomish
Visions Home Health Care	Seattle	King
Wesley Homes at Home, LLC	Des Moines	King
Wesley Homes Hospice	Des Moines	King
Wilderness Shores Nursing	Maple Valley	King

Within the application, Eden Home Health stated that King County inventory of home health providers it received from the department has 70 agencies and of those agencies, 17 have Certificate of Need approval. However, a count of the agencies listed in the table above, shows there are 68 home health providers. Of the 68 home health agencies listed in Table 1 above, the department counted 20 Certificate of Need approved agencies. This is not unexpected – licensed-only agencies are not subject to CN review and can be established relatively quickly. The discrepancy between the department’s count of CN-approved agencies and the applicants is due to discovery of documentation that grandfathered agencies into CN approval. Acceptable reasons for exclusion of an agency can include, but not limited to service area limitations, patient type limitations, and service type limitations. Furthermore, it is possible that an agency may claim a county on their license, but the agency website and marketing may indicate a narrower service area. It should be noted that the 1987 State Health Plan includes the following definitions, which were considered by the department. [Source: 1987 SHP, page B-34]

“Home health agency means an entity coordinating or providing the organized delivery of home health services”

“Home health services means the provision of nursing services along with at least one other therapeutic service or with a supervised home health aide service to ill or disabled persons in their residences on a part-time or intermittent basis, as approved by a physician”

Using this information and these definitions, the department has completed an analysis of all agencies serving King County, with a determination of which agencies should be included, below. The department considered licensing information, historical files, and information found on agency websites. The table below and on the next page show this information.

**Table 2
Department Analysis of Existing Agencies**

Agency Name	Services/Limitations	Include?	Source
ADMA Healthcare, Inc.	No Longer Licensed	Exclude	ILRS
Advanced Health Care	Skilled Nursing, Home Health Aide; serves "Tacoma, Olympia, Federal Way, and Surrounding Areas"	Exclude	ILRS
Advisacare	Skilled nursing, home health aide, and therapy services	Include	ILRS & Agency website
Alliance Nursing	Provides medically intensive ⁷ home health only	Exclude	Agency website
American Healthcare Services	Personal Care, Homemaker, Respite, Skilled Nursing, Home Health Aide	Include	ILRS
Amicable Health Care	Home Care Agency that provides Medical Staffing to Home Health	Exclude	ILRS & Agency website

⁷ Unlike the home health services included in the review of this application, medically intensive home health services are targeted specifically towards individuals with medically complex needs, and require at least four hours of continuous skilled nursing care per day. [source: WA Healthcare Authority]

Agency Name	Services/Limitations	Include?	Source
Andelcare	Change of Ownership - new owner does not provide home health, only home care	Exclude	ILRS
Assured Home Health	CN Approved	Include	CN Historical Records
Beam for Seniors - Capital Place	According to website, does not provide care outside of independent living community	Exclude	Agency website
Brookdale Home Health, LLC	CN Approved	Include	CN Historical Records
Brookdale Home Seattle	CN Approved	Include	CN Historical Records
Care Force	Personal Care, Homemaker, Respite, Skilled Nursing, Home Health Aide	Include	ILRS
Careage Home Health	CN Approved	Include	CN Historical Records
Catherine Dambrosio PHD RN and Associates LLC	Provides medically intensive home health only	Exclude	Agency website
Chesterfield Health Services	Skilled Nursing, no therapies	Exclude	ILRS
Children Country Home	Provides medically intensive home health only	Exclude	Agency website
CHI Franciscan at Home	CN Approved	Include	CN Historical Records
Comfort Keepers	Home Care only - no longer licensed to provide home health	Exclude	ILRS
Conscious Home Health Care	No Longer Licensed	Exclude	ILRS
Divine Home Health Care	No longer claims King on license	Exclude	ILRS
EKL Health	Skilled Nursing, no therapies	Exclude	ILRS
Elite Nursing	Nurse staffing agency based in Yakima with only one FTE – likely not serving King County	Exclude	ILRS
Envision Home Health	CN Approved	Include	CN Historical Records
Estelita Su Homecare	Skilled Nursing, Home Health Aide	Include	ILRS
EvergreenHealth HomeCare	CN Approved	Include	CN Historical Records
Family Resource Home Care	Skilled Nursing, Home Health Aide; only serves Seattle area	Exclude	ILRS & Agency website
Fedelta Care Solutions	Primarily Home Care agency with Nurse Delegation	Exclude	ILRS & Agency website

Agency Name	Services/Limitations	Include?	Source
Harvard Partners	CN Approved, but not currently serving Medicaid	Exclude	Survey & CN Historical Records
Health People	Skilled Nursing, Home Health Aide	Include	ILRS
Highline Home Care Services	CLOSED	Exclude	CN Historical Records
Home Angels	Home Care only - no longer licensed to provide home health	Exclude	ILRS
J and J Integrity Home Health Care, LLC	Skilled Nursing, Home Health Aide; only serves Seattle area	Exclude	ILRS & Agency website
Jewish Family Services	Home Care only - no longer licensed to provide home health	Exclude	ILRS
Judson Park	According to website, does not provide care outside of independent living community	Exclude	ILRS & Agency website
Kaiser Permanente Home Health & Hospice	Limited to HMO members	Exclude	ILRS & Agency website
Kays Home Health Services	Nursing, Home Health, Therapies	Include	ILRS
Kindred at Home	CN Approved	Include	CN Historical Records
Kindred at Home	CN Approved	Include	CN Historical Records
Kindred at Home	CN Approved	Include	CN Historical Records
Kline Galland Community Based Services	CN Approved	Include	CN Historical Records
Millennia Healthcare	Skilled nursing, home health aide, and therapy services	Include	ILRS
MultiCare Home Health Hospice, and Palliative Care	CN Approved	Include	CN Historical Records
New Care Concepts	Skilled Nursing, Respite	Exclude	ILRS
Nogah Home Care	Skilled nursing, home health aide, and therapy services	Include	ILRS
Personal Best Services, LLC	Skilled nursing and nurse delegation only	Exclude	Agency website

Agency Name	Services/Limitations	Include?	Source
Proactive HomeCare	Serves "greater Seattle Area"	Exclude	Agency website
Providence Elder Place	Services are not provided in-home, are provided at program location	Exclude	Agency website
Providence Home Care Services.	CN Approved	Include	CN Historical Records
Providence Hospice and Home Care of Snohomish	CN Approved	Include	CN Historical Records
PSA Healthcare	Skilled Nursing, Respite	Exclude	ILRS
Rainier Home Health	CN Approved	Include	CN Historical Records
Rehab Without Walls	Skilled Nursing, Therapies - serves I-5 corridor only	Exclude	ILRS & Agency website
ResCare HomeCare	Home Care only - no longer licensed to provide home health	Exclude	ILRS
Restoration Home Health Services	No Longer Licensed	Exclude	ILRS
Right at home	Skilled nursing, home health aide, and therapy services; service area restricted to metropolitan areas	Exclude	ILRS & Agency website
Riverstone HomeCare Riverstone Healthcare	Home Care only - no longer licensed to provide home health	Exclude	ILRS
Ro Health	Provides medically intensive home health only	Exclude	Agency website
SeaMar Community Health Center	CN Approved	Include	CN Historical Records
Serengeti Home Care	Skilled Nursing, Home Health Aide	Include	ILRS
Signature Home Health	CN Approved	Include	CN Historical Records
Signature Home Health	CN Approved	Include	CN Historical Records
Sound Health Medical Supply	Skilled Nursing and DME	Exclude	ILRS
Sunup Home Care	Skilled nursing, home health aide, and therapy services	Include	ILRS
Tacoma Lutheran Support Services	No longer claims King on license	Exclude	ILRS
Unicare, LLC	No skilled nursing	Exclude	ILRS
Visions Home Health Care	Skilled nursing, home health aide, and therapy services	Include	ILRS
Wesley Homes at Home, LLC	Skilled nursing, home health aide, and therapy services	Include	ILRS

Agency Name	Services/Limitations	Include?	Source
Wesley Homes Hospice	CN Approved	Include	CN Historical Records
Wilderness Shores Nursing	Skilled nursing, home health aide	Include	ILRS

Based on the information in Table 2 above, the department concludes that 31 agencies should be included in the numeric need methodology. Table 3 identifies the agencies the department will count in the numeric need methodology.

**Table 3
Agencies Counted in the King County Home Health Methodology**

Agency Name
Advisacare
American Healthcare Services
Assured Home Health
Brookdale Home Health, LLC
Brookdale Home Seattle
Care Force
Careage Home Health
CHI Franciscan at Home
Envision Home Health
Estelita Su Homecare
EvergreenHealth HomeCare
Health People
Kays Home Health Services
Kindred at Home
Kindred at Home
Kindred at Home
Kline Galland Community Based Services
Millennia Healthcare
MultiCare Home Health Hospice, and Palliative Care
Nogah Home Care
Providence Home Care Services.
Providence Hospice and Home Care of Snohomish
Rainier Home Health
SeaMar Community Health Center
Serengeti Home Care
Signature Home Health
Signature Home Health
Sunup Home Care
Visions Home Health Care
Wesley Homes at Home, LLC
Wesley Homes Hospice
Wilderness Shores Nursing

Table 4 contains a summary of the factors used in the department’s home health numeric need methodology for King County.

**Table 4
Department’s Numeric Need Methodology Assumptions and Data**

Assumption	Data Used
Planning Area	King County
Population Estimates and Forecasts	Age Group: 0 – 85+ OFM Population Data released year 2012, medium series: Base Year 2017 – 2,051,195 Projected Year 2020 – 2,108,814
Utilization by Age Cohort	Age 0-64 = 0.005 Age 65 – 79 = 0.044 Age 80+ = 0.183
Number of Visits by Age Cohort	Age 0-64 = 10 visits Age 65 – 79 = 14 visits Age 80+ = 21 visits
Existing Number of Providers	32 providers based on Table 3

A summary of the department’s numeric need methodology is presented below in Table 5. The methodology and supporting data is provided in Appendix B attached to this evaluation.

**Table 5
King County Home Health Need Projection**

	2018	2019	2020
Total Number of Patient Visits	479,425	488,391	497,357
Divided by 10,000	47.94	48.84	49.74
Rounded Down	47	48	49
Existing Number of Agencies	32	32	32
Net Need	15	16	17

Based solely on the numeric need methodology above, need for an additional home health agency in King County is demonstrated.

WAC 246-310-210

In addition to the numeric need, the department must determine whether other services and facilities of the type proposed are not or will not be sufficiently available and accessible to meet that need.

Eden Home Health

“As the Department has recognized, Washington’s licensed-only home health agencies do provide some part of the planning area’s need in-home health services. The limited data we have—from the 2016 Pierce County and other prior such surveys—shows that is less than 1% of the total being delivered. A different approach to data collection might generate a different split.

And, the relative percentages may vary from planning area to planning area⁸. Nevertheless, two factors prevent the counting of license-only agencies in considering whether a new agency is an unnecessary duplication of similar services:

- 1. They are not financially accessible to Type 2⁹ patients. And, it is the Type 2 patients that make up over 99% of all patients in King County.*
- 2. The 1987 SHP Interim Home Health Need Estimate methodology and standards prohibits their being counted as available capacity unless they meet all of the standards delineated there.*

As a result, even absent numeric need, the addition of a new Medicare-certified HHA is not an unnecessary duplication of existing services if those existing services include one or more licensed-only agencies.” [Source: Application page 28]

Public Comment

Please see the public comment outlined under the numeric need section

Rebuttal Comment

Please see the rebuttal outlined under the numeric need section

Department Evaluation

The letters of support received by the department supports the applicant effort to establish a Medicare and Medicaid home health agency in King County. Letters from existing skilled nursing providers show that if project is approved, they would refer home health patients to for Eden Home Health.

The comments in opposition to the establishment of a new home health agency were limited to two existing home health providers.

For the projected numeric need in the planning area, it is important to note that the numeric methodology assumes that all 31 agencies counted as available to provide home health services in King County will provide at least 10,000 visits annually. Shown in Table 6 is the names and the number of visits provided by the agencies who responded to the department survey in King County.

⁸ The Department might consider asking for visit volumes on the annual in-home agency license renewal forms; it might consider generating planning area percentage splits between Medicare-certified and licensed only volumes similar to those generated for dedicated vs. mixed-use OR's in evaluation of "need" for ASC's in a planning area.

⁹ The application defines a 'type 2' patient as: "*those patients whose condition is complex and/or acute enough to require a physician's monitoring of their care, who need the intermittent care of both nursing and at least one other therapy or home health aide.*" [source: Application p23]

Table 6
Survey Respondents and Volumes

Respondent	# of Visits
Brookdale Home Health	24,532
Envision Home Health of Washington, LLC	6,750
Evergreen Health Home Care Services	125,000
Harvard Partners	20,096
Kindred/ Gentiva	96,017
SeaMar Community Health Services	467
Wesley Homes Community Health Services	7,599
Total Number of Visits reported in survey	280,461
Department project number of visits in 2018	479,425

Of the agencies listed in the table above, three provided visits that are less than 10,000 expected visits. However four agencies provided visits that far exceeded the 10,000 expected visits. In year 2018, the applicant first year of operation the department methodology projected 479,425 annual visits for the planning area. If this projected number (479,425 – 280,461) is deducted from the number of visits reported by the agencies responding to the department survey, the result is 198,964 visits which are more than enough to support the addition of another agency.

The department inventory of Medicare and Medicaid certified home health agencies shows that 20 agencies are within this category, but of that number only seven responded to the department survey. Because the department did receive survey responses from all Medicare and Medicaid certified agencies in King County, the department will assume that the addition of another Medicare and Medicaid certified agency, will not negatively affect those agencies. For those agencies responding to the department’s request for utilization survey, only two agencies voiced opposition to the addition of a new agency. These two agencies provide around 100,000 visits annually, controlling a significant portion of the King County market. The department does not expect that the addition of a single home health agency would adversely affect these agencies, especially considering the numeric need for approximately 17 agencies.

Eden Home Health indicated in the application that it intend to serve the entirety of King County and letters of support from management staff at the nursing homes operated or owned by the applicant parent entity stated if approved, Eden Home Health will serve as a referral source for patients.

Based on the information above, the department concludes that Eden Home Health demonstrated need for its proposed project, and that this project has the potential to improve access to home health services in King County. Furthermore, it does not appear that approval of an additional Medicare and Medicaid certified home health agency would result in an unnecessary duplication of services. **This sub-criterion is met.**

- (2) All residents of the service area, including low-income persons, racial and ethnic minorities, women, handicapped persons, and other underserved groups and the elderly are likely to have adequate access to the proposed health service or services.

To evaluate this sub-criterion, the department evaluates an applicant's admission policies, willingness to serve Medicare and Medicaid patients, and to serve patients that cannot afford to pay for services.

The admission policy provides the overall guiding principles of the facility as to the types of patients that are appropriate candidates to use the facility and assurances regarding access to treatment. The admission policy must also include language to ensure all residents of the planning area would have access to the proposed services. This is accomplished by providing an admission policy that states patients would be admitted without regard to race, ethnicity, national origin, age, sex, pre-existing condition, physical, or mental status.

Medicare certification is a measure of an applicant's willingness to serve the elderly. With limited exceptions, Medicare is coverage for individuals age 65 and over. It is also well recognized that women live longer than men and therefore more likely to be on Medicare longer.

Medicaid certification is a measure of an applicant's willingness to serve low income persons and may include individuals with disabilities.

Charity care shows a willingness of a provider to provide services to individuals who do not have private insurance, do not qualify for Medicare, do not qualify for Medicaid, or are under insured. With the passage of the Affordable Care Act in 2010, the amount of charity care decreased over time. However, with recent federal legislative changes affecting the ACA, it is uncertain whether this trend will continue.

Eden Home Health

"For copies of the listed policies please see Appendix K. Eden Home Health of King County LLC will be Medicare and Medicaid certified. Eden Home Health of King County, LLC will also coordinate with payers providing reimbursement for home health services to military personnel and their families and to veterans"

In order to provide services to patients consistent with the demographic and ethnic make-up of King County, outreach efforts will be made to minorities groups, ethnic communities, veteran, people with English as a second language and the hearing –or sight –impaired. These efforts include marketing and promotional materials in the predominant languages, hiring of bi-lingual staff, language line access, TTY, advertising in local ethnic neighborhood newspaper/journal and radio stations."
[Source: Application page 28-29]

Eden provided copies of the following policies that will be used by proposed King County home health agency. [Source: Application Appendix K]

- Admission Criteria and Acceptance Policy
- Charity Care Policy
- Intake Service Policy

Information within Eden Home Health application stated the table below is, *"Eden Home Health of King County, LLC Payer Mix, Percent...the percentages are not expected to change over time"*.
[Source: Application page 33]

Applicant's Table
Eden Home Health Payer Mix, King, % (Reproduced)

<i>Payer</i>	<i>Percent</i>
<i>Medicare</i>	<i>75%</i>
<i>Medicaid</i>	<i>6%</i>
<i>Commercial</i>	<i>19%</i>
<i>Self Pay</i>	<i>0%</i>
<i>Total</i>	<i>100.0%</i>

Public Comment

None

Rebuttal Comment

None

Department Evaluation

Eden Home Health company own or operate multiple skilled nursing facilities in King County and have been providing healthcare services to low-income, racial and ethnic minorities, handicapped and other underserved groups for many years. The Admission Criteria and Acceptance Policy provided by the applicant describes the process Eden Home Health will uses to admit a patient to its home health agency and it outlines rights and responsibilities for both applicant and the patient. The Admission Criteria and Acceptance Policy includes language to ensure all patients would be admitted for treatment without discrimination.

The policy states: *“As part of our commitment to providing services for Medicare and Medicaid participants, Eden Home Health does not excludes, deny benefits to, or otherwise discriminate against any person on the basis of race, color, national origin, disability, or age in admission to, participants in, or receipt of the services and benefits of nay of its programs and activities or in employment, therein, whether carried out by, Eden Home Health directly or through a contractor or any other entity with whom, Eden Home Health arranges to carry out its programs and activities”.*

A review of the pro forma financial document provided by the applicant shows it expects revenues from Medicare and Medicaid and commercial insurance. Eden Home Health stated that it does not expect the percentages of its projected payer sources to change.

Eden Home Health also provided a copy of its charity care policy that will be used at the King County home health agency. The charity policy provides the circumstances under which a patient may qualify for charity care and outlines the process a patient can use to obtain charity care. The charity policy also includes the same non-discrimination language that is included in the Admission Criteria and Acceptance Policy referenced above. The pro forma operating statement provided in the application include a charity care 'line item' as a deduction of revenue.

Based on the information provided in the application, the department concludes Eden Home Health **meets this sub-criterion.**

(3) The applicant has substantiated any of the following needs and circumstances the proposed project is to serve.

(a) The special needs and circumstances of entities such as medical and other health professions schools, multidisciplinary clinics and specialty centers providing a substantial portion of their services or resources, or both to individuals no residing in the health service areas in which the entities are located or in adjacent health service areas.

Department Evaluation

This criterion is not applicable to this application.

(b) *The special needs and circumstances of biomedical and behavioral research projects designed to meet a national need and for which local conditions offer special advantages.*

Department Evaluation

This criterion is not applicable to this application.

(c) *The special needs and circumstances of osteopathic hospitals and non-allopathic services.*

Department Evaluation

This criterion is not applicable to this application.

(4) *The project will not have an adverse effect on health professional schools and training programs. The assessment of the conformance of a project with this criterion shall include consideration of:*

(a) *The effect of the means proposed for the delivery of health services on the clinical needs of health professional training programs in the area in which the services are to be provided.*

Department Evaluation

This criterion is not applicable to this application.

(b) *If proposed health services are to be available in a limited number of facilities, the extent to which the health professions schools serving the area will have access to the services for training purposes.*

Department Evaluation

This criterion is not applicable to this application.

(5) *The project is needed to meet the special needs and circumstances of enrolled members or reasonably anticipated new members of a health maintenance organization or proposed health maintenance organization and the services proposed are not available from nonhealth maintenance organization providers or other health maintenance organizations in a reasonable and cost-effective manner consistent with the basic method of operation of the health maintenance organization or proposed health maintenance organization.*

Department Evaluation

This criterion is not applicable to this application.

B. Financial Feasibility (WAC 246-310-220)

Based on the source information reviewed and applicant’s agreement to the conditions identified in the “Conclusion” section of this evaluation, the department concludes that Eden Home Health of King County, LLC has met the financial feasibility criteria in WAC 246-310-220.

(1) The immediate and long-range capital and operating costs of the project can be met.

WAC 246-310 does not contain specific WAC 246-310-220(1) financial feasibility criteria as identified in WAC 246-310-200(2)(a)(i). There are also no known recognized standards as identified in WAC 246-310-200(2)(a)(ii) and (b) that directs what the operating revenues and expenses should be for a project of this type and size. Therefore, using its experience and expertise the department evaluates if the applicant’s pro forma income statements reasonably project the proposed project is meeting its immediate and long-range capital and operating costs by the end of the third complete year of operation.

Eden Home Health

Eden Home Health provided the assumptions used to project its King County utilization for years 2018 through 2021. [source: October 6, 2017, p11 and October 11, 2017 screening response, p2]

“... Eden provides the revised Utilization Forecast in the table below. With this revision, the initiation of home health services is now scheduled for April 1, 2018. The first year is, therefore, only 3 quarters of forecast volumes. The first three full years of operation are now 2019-2021. These assumptions underlying these volumes are the same as that discussed in the initial application. In order to be conservative while projecting out forty-five months, growth admission is held constant when admissions per month reach 60 at August, 2021.”

Reproduced Table

Utilization Forecasts				
Eden Home Health of King County, LLC				
Visits	2018 (3 qtrs.)	2019	2020	2021
RN	1,770	3,392	4,572	5,671
PT	1,261	2,416	3,256	4,039
OT	396	758	1,022	1,267
ST	93	178	241	298
MSW	47	90	121	150
HHA	279	534	720	893
Total Visits	3,846	7,368	9,932	12,318
Patients	2018 (3qtrs.)	2019	2020	2021
Unduplicated patients	216	414	558	692

Restated below are the assumptions used by Eden Home Health to project its revenue, expenses, and net income for the proposed home health agency for years 2018 through 2021. [Source: Screening responses received October 11, 2017, Page 6 and Attachment S2-1]

“Please see Attachment S2-1 for a Revised Pro Forma Operating Statement with additional information regarding the supporting assumptions. Attachment S2-1 also includes Revised Staffing Summary and Revised Depreciation Schedule incorporating 2021.

All line items in the operating statement have been annotated.

Revenue

- a) All volume assumptions are based on the Revised Volumes shown in responses to Question 10 above.
- b) Medicare and Medicaid Managed Care revenue is assumed to follow the payor mix percentages as provided in response to Question 2 above. Medicare programs are assumed to be billed at the established and published payment levels of each program and, therefore, no contractual allowances are included.
- c) Published per visit payment rates of Washington Medicaid and other Washington variants on Medicaid average \$90 per home health visit. This assumption is used for Medicaid revenues along with percent payor mix as provided in response to Question 2 above. These programs are assumed to be billed at the established and published payment levels of each program and, therefore, no contractual allowances are included.
- d) Charity care is assumed at 25% of Medicare revenue.
- e) Contractual allowances are set at 25% of commercial and other payor revenue.
- f) Percent “bed debt” is assumed at 1.5% based on Eden Home Health current experience in its other home health operations.

Expense

- a) All staffing assumptions, including salaries and FTE’s are described at the Revised Staffing Summary provided at Attachment S2-1. Assumptions driving the staffing FTE’s are shown in the initial application at the table providing visits per patients.
- b) B and O tax is statutory requirement at 1.8% of gross revenue.
- c) All line items assumptions using a “per visit” dollar cost are based on existing Eden home operations experience in Whatcom, Skagit, Snohomish and Island Counties.
- d) All other per year or per month line item cost assumptions are based on existing Eden home operations experience in Whatcom, Skagit, Snohomish and Island Counties.
- e) Depreciation amounts are based on the Revised Depreciation Schedule.
- f) Calculations for the annual lease expenses are shown in the response to Question 12 below.
- g) No inflation is assumed.

Revisions made to extend proforma through 2021:

- a) Lease costs for 2021 per year were calculated for use in the 2021 proforma operating statement. The table below is taken from Question 19 of the First Screening response. It is now revised to add a line at the bottom that shows the estimated annual lease amount for the third year, 2021, as permitted In the language of the draft lease agreement:

The month to month base price	\$1,964
Calculate 10% discount of base	$\$1,964 \times .1 = \196.40 .
Subtract discount from base price	$\$1964 - \$196.40 = \$1,767.60$
Multiply discounted price x 12 months	$\$1767.60 \times 12 = \$21,211.20$
Estimate annual cost of living increase	3.5%
2018 cost x 103.5% = 2019 cost	$\$21,211.20 \times 1.035 = \$21,953.59$
2019 cost x 103.5% = 2020 cost	$\$21,953.59 \times 1.035 = \$22,721,97$
2020 cost x 103.5% = 2021 cost	$\\$22,721,97 \times 1.035 = \\$23,517.24$

b) *Depreciation schedule is revised to add 2021. Capital items with 3-year useful life are no longer being depreciated after 2020. Please see Appendix S2-1 for the revised Depreciation Schedule.*

In addition to the assumptions restated above, Eden Home Health also provided its expected payor mix for the proposed home health agency. [source: October 6, 2017, screening response, p2] The payor mix is reproduced below.

**Eden Health of King County, LLC (Reproduced)
Percent patients by Payor, King, 2018-2021**

<i>Payer</i>	<i>2018 3qtrs.</i>	<i>2019</i>	<i>2020</i>	<i>2021</i>
<i>Medicare</i>	60%	60%	60%	60%
<i>Medicare Managed Care</i>	15%	15%	15%	15%
<i>Medicaid</i>	6%	6%	6%	6%
<i>Commercial/Other</i>	19%	19%	19%	19%
<i>Self pay</i>	0%	0%	0%	0%

Based on the assumptions restated above, Eden Home Health projected its revenue, expenses, and net income for the proposed home health agency for years 2018 through 2021. A summary of the information is shown in Table 6. [Source: Screening responses received October 6, 2017, Attachment S2-1]

**Table 7
Eden Home Health projected Revenue for Years 2018 through 2021**

	Partial Yr. 2018	Full Yr. 1 2019	Full Yr. 2 2020	Full Yr. 3 2021
Net Revenue	\$722,780	\$1,385,328	\$1,867,181	\$2,315,572
Total Expenses	\$785,947	\$1,345,546	\$1,733,553	2,113,590
EBITDA	(\$63,167)	\$39,782	\$133,628	\$201,982
Depreciation	\$7,443	\$9,924	\$9,924	\$2,843
Net Profit/(Loss)	(\$70,610)	\$29,858	\$123,704	\$199,139

Eden Home Health also provided a projected balance sheets for the proposed home health agency. Table 8 below is a summary of the projected balance sheet for year 2019. Table 9 is a summary for year 2021. [Source: Screening responses received October 6, 2017, Attachment S2-1]

**Table 8
Eden Home Health Full Year 2019**

Assets		Liabilities	
Current Assets	\$190,030	Current Liabilities	\$83,216
Property/Equipment	\$2,433	Long term Liabilities	\$0
Accumulated Depreciation	\$0	Capital/Equity	\$109,247
Total Assets	\$192,463	Total Liabilities and Equity	\$192,463

Table 9
Eden Home Health Full Year 2021

Assets		Liabilities	
Current Assets	\$573,551	Current Liabilities	\$131,127
Property/Equipment	(\$10,334)	Long term Liabilities	\$0
Accumulated Depreciation	\$0	Capital/Equity	\$432,090
Total Assets	\$563,217	Total Liabilities and Equity	\$563,217

Public Comment

None

Rebuttal Comment

None

Department Evaluation

To evaluate this sub-criterion, the department reviews the assumptions provided by Eden Home Health to project its utilization and number of visits. These assumptions are the foundation for the revenue and expense statements. The department also reviews the assumptions used for the projected revenue and expense (income) statements and balance sheets. These assumptions are also a foundation for the two projected statements.

The income statement is a financial statement that reports a company's financial performance over a specific period—either historical or projected. Projected financial performance is assessed by giving a summary of how the business expects its revenues to cover its expenses for both operating and non-operating activities. It also projects the net profit or loss incurred over a specific accounting period.

The purpose of the balance sheet is to review the financial status of the home health agency at a specific point in time. The balance sheet shows what the home health owns (assets) and how much it owes (liabilities), as well as the amount invested in the business (equity). This information is more valuable when the balance sheets for several consecutive periods are grouped together, so that trends in the different line items can be viewed.

For this application, the department reviewed the assumptions used by Eden Home Health to determine the projected number of patients and visits by discipline. Eden Home Health stated the types of patients it will serve in King County will be consistent with the experience in other markets with similar demographic profile. The applicant operate a home health agency in Snohomish County and the county demographic profile is similar to King County. A review of Eden Home Health projected patient visits shows that it assumed it will provide 17.8 visits per patient. The department concludes the applicant assumptions and projected patient visits are reasonable.

Eden Home Health expects that its operations would operate at a slight loss in partial year 2018 (three quarters of the year). However, the agency is projected to operate at a profit in full year one through year three. Based on its review of the assumptions used to project the revenues and expenses, the department concludes they are reasonable.

Eden Home Health is leasing space in Seafirst Fifth Avenue Plaza, a business center office, located at 800 Fifth Avenue in Seattle [98104]. The business center office space is located in a multi-story building and Eden Home Health intends to lease space on fourth floor of the building [suite 4100]. Eden Home Health provided a signed lease agreement for the business office space it intends to use for the home health agency. The signed agreement is between Regus Management Group, LLC (“Provider”) and Eden Home Health of King County, LLC (“Client”). [Source: Application, Appendix G]

The lease agreement Addendum provides the following clarification on the terms of the executed agreement. [Source: Application, Appendix G]

“This Addendum supplements and modifies the Online Office Agreement between Eden Home Health of King County, LLC (“Client”) and Regus Management Group, LLC (“Provider”) executed on the same date as this Addendum (“Agreement”). In the event of any conflicts between the terms and conditions of Agreement and this Addendum, the terms and conditions of this Addendum below shall control. The parties, for good and valuable consideration, the receipt and sufficiency of which is acknowledged, agree as provided above and as follows:

- 1. Party in Interest. Notwithstanding anything in the Agreement to the contrary, it is understood the contract is between the above-mentioned parties.*
- 2. The second bullet in the Comments section of the first page of the Agreement addressing the Agreement term is amended to read as follows:*

“The term of this agreement is month-to-month. In the that Client is issued a Certificate of Need by the Washington State Department of Health, upon written notice by Client, the term of this Agreement will be converted to a 1 year term starting on the date of such conversion with option for Client to renew the Agreement for 3 additional renewal terms each. Upon conversion of the term of the agreement to a 1-year term, monthly rent will be reduced by 10%.”

In addition to the documents provided above, Eden Home Health provided the following statements related to the lease agreement. [Source: October 6, 2017, Screening responses, page 8]

“As stated in the First Screening Response at page 18, “the applicant would provide a more detailed lease agreement with the relevant terms and conditions than that provided in Appendix G of the initial application for the department to review if the project is approved. Eden Home Health of King County, LLC would certainly agree to a condition related to the lease agreement that requires the applicant to provide a copy of a revised lease to contain additional detail as specified by the Department.”

Eden Home Health also provided a draft Medical Director Agreement, with an attached Business Associate Agreement. The draft agreement is between Eden Home Health of King County, LLC and Dr. Sabine Maria von Preyss-Friedman, MD. The draft Medical Director Agreement identifies roles and responsibilities for each. All costs associated with the agreement are substantiated in the pro forma revenue and expense statement. The agreement is effective for one year from the date of signature, with automatic annual renewals. [source: Application, Appendix E]

If this project is approved the department would attach a condition related to the draft Medical Director Agreement. The condition is stated below.

Prior to providing Medicare and Medicaid home health services in King County, Eden Home Health shall provide the Certificate of Need Program with a copy of the executed "Directorship Independent Contractor Agreement." The executed agreement shall be consistent with the draft agreement provided in the application, which includes the "Business Associate Agreement."

Based on the information above and provided the applicant agrees to the conditions, the department concludes that the immediate and long-range operating costs of the project can be met. **This sub-criterion is met.**

- (2) The costs of the project, including any construction costs, will probably not result in an unreasonable impact on the costs and charges for health services.

WAC 246-310 does not contain specific WAC 246-310-220(2) financial feasibility criteria as identified in WAC 246-310-200(2)(a)(i). There are also no known recognized standards as identified in WAC 246-310-200(2)(a)(ii) and (b) that directs what an unreasonable impact on costs and charges would be for a project of this type and size. Therefore, using its experience and expertise the department compared the proposed project's costs with those previously considered by the department.

Eden Home Health

"Estimated capital expenditures are limited to office furnishings and equipment. They are based on Eden Home Health of King County, LLC's experience establishing similar offices and on vendor estimates."

"Appendix L provides a list of furnishings and equipment and their estimated costs." [Source: Application Page 30-31]

The capital expenditure associated with this project is \$33,700. The capital expenditure costs is for furniture and equipment. There are no construction costs required for this project. [Source: Application Page 30 Appendix L]

Public Comment

None

Rebuttal Comment

None

Department Evaluation

Within the application, Eden Home Health stated the capital costs associated with this project is limited to office furniture and equipment. When cost of this project compared to similar home health applications in the past, the department concludes the cost is reasonable. A review of the projected payer mix projected by the applicant is consistent with similar projects payer mix for King County. **This sub-criterion is met.**

- (3) The project can be appropriately financed.

WAC 246-310 does not contain specific source of financing criteria as identified in WAC 246-310-200(2)(a)(i). There are also no known recognized standards as identified in WAC 246-310-200(2)(a)(ii) and (b) that directs how a project of this type and size should be financed. Therefore,

using its experience and expertise the department compared the proposed project's source of financing to those previously considered by the department.

Eden Home Health

“Eden Home Health provided the following information related to this sub-criterion”. [Source: Application Page 30 Appendix L]

(Reproduced)

<i>Item</i>	<i>Expenses</i>
<i>Network, telephone equip.</i>	<i>\$ 12,900.00</i>
<i>Phone Switch</i>	<i>\$ 7,000.00</i>
<i>Hand –held/laptops</i>	<i>\$ 13,800.00</i>
<i>Total</i>	<i>\$ 33,700.00</i>

“Estimated capital expenditures are limited to office furnishings and equipment. They are based on Eden Home Health of King County, LLC’s experience establishing similar offices and on vendor estimates.” [Source: Application Page 30-31]

“Please see Appendix M for a letter of commitment from Michael Miller, Vice President and Chief Financial Officer.

“Since financing involves unnecessary interest expense, Eden Home Health of King County, LLC has elected to fund the establishment of the agency with available cash”. [Source: Application Page 32-33]

Public Comment

None

Rebuttal Comment

None

Department Evaluation

Eden Home Health provided a breakdown of its estimated capital costs and letter from its Chief Financial Officer confirming applicant’s commitment to finance the project (including startup costs) using its reserves. [source: Application, Appendix M]

The application included projected pro forma balance sheet financial statements, and it shows that cash would be available for this project. The estimated capital expenditure would likely not have any impact on the financial health of Eden Home Health.

Based on the source information reviewed the department concludes **this sub-criterion is met.**

C. Structure and Process (Quality) of Care (WAC 246-310-230)

Based on the source information reviewed and the applicant’s agreement to the conditions identified in the “Conclusion” section of this evaluation, the department concludes that Eden Home Health of King County, LLC has met the structure and process (quality) of care criteria in WAC 246-310-230.

- (1) *A sufficient supply of qualified staff for the project, including both health personnel and management personnel, are available or can be recruited.*

WAC 246-310 does not contain specific WAC 246-310-230(1) criteria as identified in WAC 246-310-200(2)(a)(i). There are also no known recognized standards as identified in WAC 246-310-200(2)(a)(ii) and (b) that directs what specific staffing patterns or numbers of FTEs that should be employed for projects of this type or size. Therefore, the department uses its experience and expertise to determine whether the planning would allow for the required coverage.

Eden Home Health

“Based on current experience, Eden Home Health does not expect staff availability to be a problem. A number of factors support this:

- *As a large multi-state organization, EmpRes and Eden have employees and exposure across numerous job markets. Staff mobility between markets supports recruitment and retention efforts.*
- *As an employee-owned organization, EmpRes and Eden experience lower turn-over rates than many other health care providers.*
- *The EmpRes commitment to employees/Residents reflected in the company name is also reflected in management efforts to prioritize employees and residents core to any success.*
- *With five skilled nursing facilities located in King County, EmpRes is already familiar with the most effective means for local and regional outreach and networking to support recruitment efforts.”* [Source: Application page 35-36]

Eden Home Health provided a table showing the projected number of FTEs (full time equivalents) for the proposed home health agency. The table is reproduced below. [Source: Screening responses received October 6, 2017, Attachment S2-1]

Eden Staffing Pattern (Reproduced)

<i>Staffing Input –By FTE’S</i>		<i>2018 3 qtrs.</i>	<i>2019</i>	<i>2020</i>	<i>2021</i>
<i>Operations</i>	<i>Salary</i>				
<i>Physician (Medical Director)</i>	<i>Contracted</i>				
<i>Director of Professional Services</i>	<i>\$ 100,000</i>	<i>0.75</i>	<i>1.00</i>	<i>1.00</i>	<i>1.00</i>
<i>Clinical Manager</i>	<i>\$ 80,000</i>	<i>-</i>	<i>0.50</i>	<i>1.00</i>	<i>1.00</i>
<i>RN</i>	<i>\$ 70,700</i>	<i>1.24</i>	<i>2.37</i>	<i>3.19</i>	<i>3.95</i>
<i>PT</i>	<i>\$ 95,491</i>	<i>0.97</i>	<i>1.86</i>	<i>2.50</i>	<i>3.10</i>
<i>OT</i>	<i>\$ 89,338</i>	<i>0.30</i>	<i>0.58</i>	<i>0.78</i>	<i>0.97</i>
<i>ST</i>	<i>\$ 75,989</i>	<i>0.08</i>	<i>0.15</i>	<i>0.21</i>	<i>0.25</i>
<i>MSW</i>	<i>\$ 65,000</i>	<i>0.06</i>	<i>0.11</i>	<i>0.15</i>	<i>0.18</i>
<i>HHaide</i>	<i>\$ 31,200</i>	<i>0.18</i>	<i>0.34</i>	<i>0.46</i>	<i>0.57</i>
<i>Total</i>		<i>3.57</i>	<i>6.91</i>	<i>9.29</i>	<i>11.04</i>

Eden Staffing Pattern (Reproduced)

Administrative					
<i>Administrator</i>	\$ 115,000	-	-	0.50	1.00
<i>Office Manager</i>	\$ 48,000	0.75	1.00	1.00	1.00
<i>Team Assistant</i>	\$ 35,360	0.75	1.00	1.00	1.00
<i>Data Entry Clerk</i>	\$ 30,000	0.41	0.80	1.06	1.23
<i>Community Outreach</i>	\$ 80,000	1.50	2.00	2.00	2.00
Total		3.41	4.80	5.56	7.23

Total FTE's		6.98	11.71	14.85	18.27
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Related to this sub-criterion, Eden Home Health provided its projected staff to patient visit ratio using information from three of recent CN applications submitted for the planning area. The information is below.

“The table below shows the ratios provided by three recent CON applicants and also shows the existing staffing ration at Eden Home Health Bellingham, serving Whatcom, Skagit, Snohomish and Island Counties.” [Source: Application page 35 and Screening responses received September 12, 2017, page 14]

Staffing ratios by discipline, recent applicants and Eden in WA (Reproduced)

Discipline	Eden	Careage	Envision	Encore	Bellingham
<i>Skilled Nursing (RN)</i>	4.5	4.4	4.9	4.5	4.5
<i>Physical Therapy</i>	4.5	4.4	contracted	4.5	4.5
<i>Occupational Therapy</i>	4.5	4.4	contracted	3.85	4.5
<i>MSW</i>	3.2	1.5	contracted	3.85	4.5
<i>Speech Therapy</i>	4.0	4.4	3.2	5.06	4.0
<i>Home Health Aides</i>	6.0	6.0	5.1	3.47	6.0

Public Comment

None

Rebuttal Comment

None

Department Evaluation

As stated in the “Applicant Description” section of this evaluation, Eden Home Health is owned by EmpRes Home Health and Hospice, LLC, which in turn is operated under EmpRes Healthcare Group, Inc. EmpRes Healthcare Group, Inc. manages or operates 19 skilled nursing and 3 assisted living facilities in Washington. Many of the 19 skilled nursing and 3 assisted living facilities have been in continuous operation in Washington for many years. Based on this information, the department can establish that Eden Home Health shares an understanding of recruitment and retention of appropriate staff for its home health agency.

Since Eden Home Health will be establishing a new agency in King County, it is assumed that all staff would be new to the agency. As shown in the reproduced table, the applicant identified need for 6.98 FTEs in partial year 2018. By the end of the third year of operation, 18.27 FTEs are projected

to be needed. Most of the projected FTEs are nurses and physical therapist which are positions responsible for direct patient care.

Eden Home Health also provided its projected staffing ratio of 4.5 staff per patient visit. This staff per patient visit ratio is reasonable and consistent with data provided in past home health applications reviewed by the program.

Eden Home Health also provided a draft Medical Director Agreement with Dr. Sabine Maria von Preyss-Friedman, MD. The draft agreement includes all of the information necessary for the department to include a condition if this project is approved.

The strategies identified by Eden Home Health are consistent with those of other home health applicants reviewed and approved by the department. Based on the above information, the department concludes that Eden Home Health has the ability and expertise to recruit and retain a sufficient supply of qualified staff for this project. **This sub-criterion is met.**

(2) The proposed service(s) will have an appropriate relationship, including organizational relationship to ancillary and support services, and ancillary and support services will be sufficient to support any health services included in the proposed project.

WAC 246-310 does not contain specific WAC 246-310-230(2) as identified in WAC 246-310-200(2)(a)(i). There are also no known recognized standards as identified in WAC 246-310-200(2)(a)(ii) and (b) that directs what relationships, ancillary and support services should be for a project of this type and size. Therefore, using its experience and expertise the department assessed the materials contained in the application.

Eden Home Health

“Please see Appendix P for a list of vendors of support services for Eden Home Health of King County.” [Source: Application, page 37, Appendix P]

- Medical Supplies—Medline and Roche Diagnostics
- Quality and Outcome Vendor—Strategic Healthcare Programs (SHP)
- HHC AHPS—Pinnacle
- Electronic Health Record—Homecare Homebase Celltrak Clearing House—Zirmed
- Telephone/Internet Services—Verizon Wireless
- Shredding—Iron Mountain
- Answering Service (After-hours)—Telemed
- Virtual Care Technology—Collain
- Coding—Fazzi
- Learning Management System—Fazzi Academy and Lippincott
- Online Patient Education—Krames
- Shipping /Postage—FedEx
- Payroll System—Kronos
- Financial Monitor-Simione
- Wound Vacs—KCI
- Hazardous Waste Disposal—Stericycle
- Interpretation—Language Line Services
- Website—Yolocare
- Recruiting—Indeed and Healthjobs Nationwide
- Background Checks—HR Profile
- OIG Searches—Certiphino Screening
- Office Supplies/Promotional Products—Office Depot

Public Comment

None

Rebuttal Comment

None

Department Evaluation

As shown by the extensive listing of ancillary and support services vendors that Eden Home Health intends to use, the applicant project to have all necessary ancillary and support services in place. As previously stated, the department can conclude that Eden Home Health shares an understanding of ancillary and support services necessary for a home health agency.

Based on the information reviewed, the department concludes Eden Home Health **meet this sub-criterion**.

- (3) There is reasonable assurance that the project will be in conformance with applicable state licensing requirements and, if the applicant is or plans to be certified under the Medicaid or Medicare program, with the applicable conditions of participation related to those programs.

WAC 246-310 does not contain specific WAC 246-310-230(3) criteria as identified in WAC 246-310-200(2)(a)(i). There are known recognized standards as identified in WAC 246-310-200(2)(a)(ii) and (b) that a facility must meet when it is to be Medicare and Medicaid certified. Therefore, using its experience and expertise the department assessed the applicant's history in meeting these standards at other facilities owned or operated by the applicant.

Eden Home Health

Eden Home Health provided the following information related to this sub-criterion. [Source: Application, page 38]

“Eden Health family of agencies offers a combination of seven home health, hospice and personal care agencies in four states. Each Eden Health agency employs competent qualified staff, paired with organization and responsive management.

Additionally, senior level leadership is provided by the agency's management company, EmpRes Healthcare Management, LLC, located in Vancouver Washington.

Each Eden home health agency has developed an excellent reputation within their respective communities and has built strong relationships with their referral source and healthcare partners.

Eden Home Health of King County, LLC d/b/a Eden Home Health (“Eden Home Health”) will establish its agency office in downtown Seattle. King County is home to five skilled nursing facilities which are affiliates under common ownership with Eden Home Health and which are also managed by EmpRes Healthcare Management, LLC.

The Eden health family of agencies expanded its provision of home health services into new locations in the last three years: Idaho Falls, Idaho in 2014 and Elk Grove, California in 2016. In the short time that these agencies have been operating, they have successfully managed a steady increase in patients served. Each agency ta present has over 90 patients on service.”

Public Comment

A section of the department's utilization survey allows for existing providers to include comments. One agency provided comments in the survey related to this sub-criterion. The comments are restated below.

Evergreen Health Home Care Services

“Quality of patient care has not improved through market saturation of for-profit agencies. Providing excellent patient care is very expensive and for profit organizations stress the market through non-compliance practices AND accepting only profitable Medicare patients. I am strongly against allowing yet another agency to enter the market and practice the wrong type of home health. When profits are only 5% and for profit firms demand 15% bottom line, care is worse and nurses and other professionals are underpaid. Happy to provide more detail. I am on the board of directors of the National Home Care Association and could support this with data if given time. I apologize for the informal response.” [emphasis in original]

[source: Evergreen Home Health Care Services utilization survey response, p3]

Rebuttal Comment

Eden Home Health’s rebuttal comments are below. [source: Eden Home Health rebuttal comment, pp3-4]

“Evergreen makes numerous disparaging and unsubstantiated remarks about the existing "for profit" home health agencies in King County. As a 100% employee-owned company, EmpRes Healthcare Group, Inc. and its subsidiary Eden Home Health of King County, LLC object to the blanket and uninformed characterizations made by Evergreen. Evergreen states it could have provided detail if it had time. Yet, the Certificate of Need process allowed Evergreen nearly two months for public comment beyond the time allowed for Evergreen's survey response. Evergreen's comments are unfortunate and inflammatory coming from an official of a publicly-owned hospital district with locally elected commissioners.

Furthermore, it is surprising that, as one of the largest home health agencies in the state, Evergreen cannot report firm numbers for admissions or visits serving King County residents in 2016. Provided as estimates - and not solid volume numbers – the Evergreen figures cannot be used by the Department to make an accurate determination of existing capacity in King County.”

Department Evaluation

As stated in the applicant description section of this evaluation EmpRes Healthcare Group, Inc. owns, manages, or operates eight EmpRes Healthcare, LLCs in California, Idaho, Montana, Nevada, Oregon, Washington and Wyoming. These eight EmpRes Healthcare, LLCs operate skilled nursing and assisted living facilities. Another entity under EmpRes Healthcare Group, Inc. is EmpRes Home and Hospice, LLC under this entity a division known as EmpRes Home Health, LLC operate home health and home care services under the brand name of Eden Home Health.

In Washington EmpRes Washington Healthcare, LLC manages or operates 19 skilled nursing and 3 assisted living facilities. In 2014, Eden Home Health acquired Option Care Enterprise’s Medicare and Medicaid certified home health agency and its home care agency. Both agencies are located in Whatcom County and provide services under Eden Home Health and Eden Home Care, respectively.

The home health agency obtained an initial Washington State home health license on July 15, 2014. Since then, the agency has been surveyed twice: January 15, 2015 and June 6, 2016. Both surveys resulted did not find significant non-compliance issues. [Source: ILRS survey data and Department of Health Investigations and Inspections Office]

The home care agency obtained an initial Washington State home care license on April 5, 2016. Since then, the agency has been surveyed once: May 3, 2016. The survey did not find any significant non-compliance issues. [Source: ILRS survey data and Department of Health Investigations and Inspections Office]

For the 19 skilled nursing and 3 assisted living facilities in Washington that are operated under EmpRes Washington Healthcare, LLC, as part of this review, the department must conclude that the proposed services will be provided in a manner that ensure safe and adequate care to the public.¹⁰

To accomplish this task, the department reviewed information from the Center for Medicare and Medicaid Services Nursing Home Compare (CMS) website for its health inspections star rating. CMS assigns one to five ‘star rating’ in three separate sources: health inspections, staffing, and quality of residents care measures. The health inspection star rating is based on the three most recent nursing home inspections CMS calculates a star rating for each of the three sources, along with an overall rating. The more stars, the better the rating. Shown in Table 10 below is the nursing facilities owned, managed or operated by EmpRes Washington Healthcare, LLC. [Source: January 12, 2017, CMS Compare Data]

**Table 10
Medicare and Medicaid Star Rating and Most Recent Standard Health Inspection**

Facility Name	City	Inspection Date	# of Health Citations	Health Inspection Rating¹¹
Advance Post Acute	Auburn	03/29/2017	20	2
Alaska Gardens Health and Rehab	Tacoma	06/14/2017	16	3
Alderwood Park Health and Rehab	Bellingham	03/30/2017	16	2
Americana Health and Rehab Center	Longview	06/14/2017	12	3
Buena Vista Nursing Home	Colville	06/22/2017	6	5
Canterbury House	Auburn	12/14/2016	22	2
Enumclaw Health & Rehab Center	Enumclaw	08/24/2016	13	2
Frontier Rehab and Extended Care Center	Longview	07/18/2017	13	3
Fort Vancouver Post Acute Home	Vancouver	10/24/2017	12	3
Highland Health and Rehab	Bellingham	05/25/2017	31	1
Health and Rehab of North Seattle ¹²	Seattle	08/18/2017	19	2
North Cascades Health and Rehab Center	Bellingham	11/18/2016	14	3
Park Royal Health and Rehab	Longview	06/12/2017	8	4
Royal Park Health and Rehab	Spokane	10/17/2016	15	3
Seattle Medical Post Acute Care	Seattle	11/01/2016	12	1
Shelton Health & Rehab Center	Shelton	06/28/2017	17	2
Snohomish Health and Rehab	Snohomish	08/21/2017	37	1
Talbot Center for Rehab and Healthcare	Renton	10/13/2016	36	1
Whitman Health and Rehab center	Colfax	08/15/2017	4	4

¹⁰ WAC 246-310-230(5)

¹¹ Nursing homes that are certified by Medicare and Medicaid are regularly inspected each year by health care professionals. During a nursing home regular quality of care, environmental and fire safety inspection, and or complaints investigations, nursing homes found to be deficient receive deficiency citations. [Source: <https://www.medicare.gov/nursinghomecompare>]

¹² Health and Rehabilitation of North Seattle is no longer operational as of January 2018.

According to CMS nursing home compare the average number of health inspections citations received by Washington nursing homes is 13.7. Of the 19 nursing homes, 11—or 58%—have had more than the average citations for Washington State.

The review of the out of state facilities own or operated by EmpRes Healthcare Group, Inc. is shown in the table below.

**Table 11
EmpRes Healthcare Group Out of State Facilities
Medicare and Medicaid Star Rating and Most Recent Standard Health Inspection**

Facility Name	City/State	Inspection Date	# of Health Citations	Health Inspection Rating
Evergreen at Arvin Healthcare	Arvin, CA	08/17/2017	13	1
Heartwood Avenue Healthcare	Vallejo, CA	08/04/2017	4	3
EmpRes Post Acute Rehabilitation	Petaluma, CA	01/09/2017	11	4
New Hope Post Acute Care	Tracy, CA	02/10/2017	6	3
Teton Post Acute Care and Rehabilitation	Idaho Falls, ID	04/10/2017	10	4
Royal Plaza Health and Rehabilitation	Lewiston, ID	04/20/2017	3	5
Hot Springs Health and Rehab Center	Hot Springs, MT	08/09/2017	7	5
Laurel Health and Rehab Center	Laurel, MT	08/31/2017	13	3
Missoula Health and Rehab Center	Missoula, MT	03/23/2017	9	4
Polson Health and Rehab Center	Polson, MT	07/26/2017	13	4
Ormsby Post Acute Rehab Center	Carson City, NV	02/16/2017	5	4
Gardnerville Health and Rehab Center	Gardnerville, NV	12/21/2017	7	2
Mountain View Health and Rehab Ctr.	Carson City, NV	03/29/2017	7	4
Pahrump Health and Rehab Center	Pahrump, NV	06/23/2017	3	1
Independence Health and Rehab Center	Independence, OR	04/10/2017	16	2
LaGrande Post Acute Rehab	LaGrande, OR	05/19/2017	16	1
Milton Freewater Health and Rehab Ctr.	Milton Freewater, OR	07/13/2017	3	4
Portland Health and Rehab Center	Portland, OR	04/25/2017	9	5
EmpRes Hillsboro Health and Rehab Ctr.	Hillsboro, OR	04/10/2017	9	5

[Source: September 12, 2017, screening response, Appendix s-1]

Information obtained from the CM website shows non-compliance deficiencies were cited within the past three years. Those facilities submitted and implemented acceptable plans of correction. Given the compliance history of the out-of-state facilities owned or operated by EmpRes Healthcare Group, Inc. the department concludes that the out of state non-compliance history for EmpRes Healthcare Group, Inc. is acceptable.

Eden Home Health identified Sabine Von Preyss-Friedman, MD as the proposed medical director for proposed home health agency. A review of Sabine Von Preyss-Friedman compliance history with the Department of Health's Medical Quality Assurance Commission did not revealed any recorded sanctions. [Source: Compliance history provided by Medical Quality Assurance Commission]

Based on the above information the department concludes there is reasonable assurance Eden Home Health would operate in compliance with state and federal licensing and certification requirements. **This sub criterion is met.**

- (4) *The proposed project will promote continuity in the provision of health care, not result in an unwarranted fragmentation of services, and have an appropriate relationship to the service area's existing health care system.*

WAC 246-310 does not contain specific WAC 246-310-230(4) criteria as identified in WAC 246-310-200(2)(a)(i). There are also no known recognized standards as identified in WAC 246-310-200(2)(a)(ii) and (b) that direct how to measure unwarranted fragmentation of services or what types of relationships with a services area's existing health care system should be for a project of this type and size. Therefore, using its experience and expertise the department assessed the materials in the application.

Eden Home Health

"When entering a new market, Eden local team focuses on relationships with institutions that refer large numbers of their current patients to home health agencies. Especially with skilled nursing facilities under the same ownership, Eden staff is key to implementing the Transitions program that is an evidence-based, 30-day program offered to patients who meet certain criteria, and is provided at no cost to the patient.

Participating patients are tracked for re-hospitalization for 60 days from the day of discharge. The goals of the Care Transitions program are to improve patient outcomes, reduce avoidable readmissions as well as reduce health care costs by training or "coaching" as well as encouraging patients to be more involved in their health care.

Eden Home Health partners with LG technologies for its tele-health/virtual care technology platform. With this technology, Eden is able to obtain vitals for blood pressure, body weight and oxygen saturation are measured daily and monitored at the Eden Home Health office on working business days. Vitals that are outside physician specified parameters are reviewed by a nurse and subsequent interventions such as nursing visit and MD notification occurs. In other markets, Eden Home Health has been able to partner with local physicians for video visits to be completed in the patient's home". [Source: Application page 37]

Public Comment

Advanced Post Acute

"Our facility alone could refer 1-2 people per week to Eden if it were approved within King County. We feel that Eden's Company values mirror the values of Advanced Post-Acute and that it would provide the best continuity of care for our residents as they transition back home." [Source: Letter of support]

Canterbury House

"Providing Eden Home Health in King County would be beneficial for nursing facilities likes ours. Residents being admitted are younger and higher functioning that could benefit from home health services. It would create a better tracking system after skilled service are no longer needed, and

would increase resident retention through multiple levels of care. Similar to Health Maintenance Organization, it would create more efficient and effective way for our building to continue to provide quality care to residents after discharge.” [Source: Letter of support]

Health and Rehabilitation of North Seattle

“I feel this county is currently underserved and my residents would benefit with another option for care after discharge from my center. I have been an Administrator for almost 2 years and working for EmpRes Healthcare for over 5 years. During my tenure at this building we have been successful in increasing the number of short-term rehabilitation residents we serve; therefore, increasing the number discharged resident integrating back into the community with a need for home health services.” [Source: Letter of support]

Seattle Medical Post Acute Care

“We serve a very specific and different population of skilled care patients in the Seattle and King County area. Unlike most Skilled Nursing Facilities, Seattle Medical Post-Acute care is one of the few Skilled Nursing Facilities in the state of Washington that can accommodate respiratory residents. We often discharge many of our respiratory residents to home health who need caregivers and are healthy enough to go home. Often because they have such acute care they need many hours of caregivers at home.” [Source: Letter of support]

Talbot Center for Rehabilitation and Healthcare

“Currently, home health agencies we work with have lack of appropriate follow-up, staff shortages (particularly physical therapist), and reduced frequency of visits are some of the issues we face with some home health providers. Talbot Center makes several referrals to home agencies each week which makes access to quality home health essential.” [Source: Letter of support]

Rebuttal Comment

None

Department Evaluation

As shown by the letters of support the department received from the applicant affiliated nursing homes located within King County, it appears that those support letters provide valuable perspectives related to this sub-criterion. The dominant theme of the letters emphasizes finding a provider that can provide follow up home health care services to patients discharged from skilled nursing facilities. Eden Home Health stated its staff are key to implementing care transitions programs that track and can improve patient outcomes and reduce avoidable readmissions to the hospitals.

Within its projected FTEs Eden Home Health demonstrated it would allocate adequate hours to its nursing staff who will be the key to implementing the care transitions programs. With access to home health referrals within the planning area, Eden Home is better positioned to use its care transitions program to provide home health care in King County. Based on the information reviewed, the department concludes **this sub-criterion is met.**

- (5) There is reasonable assurance that the services to be provided through the proposed project will be provided in a manner that ensures safe and adequate care to the public to be served and in accord with applicable federal and state laws, rules, and regulations.

Department Evaluation

This sub-criterion is evaluated in sub-section (3) above, **is met**

D. Cost Containment (WAC 246-310-240)

Based on the source information reviewed and the applicant’s agreement to the conditions identified in the “Conclusion” section of this evaluation, the department concludes that Eden Home Health of King County, LLC has met the cost containment criteria in WAC 246-310-240.

(1) Superior alternatives, in terms of cost, efficiency, or effectiveness, are not available or practicable.

To determine if a proposed project is the best alternative, in terms of cost, efficiency, or effectiveness, the department takes a multi-step approach. First the department determines if the application has met the other criteria of WAC 246-310-210 thru 230. If the project has failed to meet one or more of these criteria then the project cannot be considered to be the best alternative in terms of cost, efficiency, or effectiveness as a result the application would fail this sub-criterion.

If the project has met the applicable criteria in WAC 246-310-210 through 230 criteria, the department then assesses the other options considered by the applicant. If the department determines the proposed project is better or equal to other options considered by the applicant and the department has not identified any other better options this criterion is determined to be met unless there are multiple applications.

If there are multiple applications, the department’s assessment is to apply any service or facility superiority criteria contained throughout WAC 246-310 related to the specific project type. The adopted superiority criteria are objective measures used to compare competing projects and make the determination between two or more approvable projects which is the best alternative. If WAC 246-310 does not contain any service or facility type superiority criteria as directed by WAC 246-310-200(2) (a)(i), then the department would look to WAC 246-310-240(2)(a)(ii) and (b) for criteria to make the assessment of the competing proposals. If there are no known recognized standards as identified in WAC 246-310-200(2)(a)(ii) and (b), then using its experience and expertise, the department would assess the competing projects and determine which project should be approved.

Department Evaluation

Step One:

The department concluded that Eden Home Health of King County, LLC met the applicable review criteria under WAC 246-310-210, 220, and 230. Therefore, the department moves to step two.

Step Two:

Eden Home Health

“The alternative to the proposed project that Eden Home Health of King County considered include:

- 1. Postponing action.*
- 2. Purchasing an existing King County agency.*
- 3. Establishing a new agency in different county.*

Eden Home Health of King County's decision-making criteria:

- Response to community's need including synergy with Transitions program
- Availability
- Quality of care.

1. Postponing action, results of analysis

Summary: Overall, waiting and thereby postponing action was rejected as a reasonable alternative. Eden Home Health of King County sees the immediate need to improve timeliness of response to institution referral requests and patient clinical requirement.

2. Purchasing an existing King County agency, results of analysis

Summary: Overall, purchasing an existing agency responded well to Eden's criteria. Unfortunately, since no agency was available for purchase this alternative could not be pursued any further.

3. Establishing a home health agency in a different county, result of analysis

Summary: Overall, establishing an agency in a different county was not a preferred alternative to establishing one in King County. Referral relationships are not in place as they are at Eden's related skilled nursing facilities, so responsiveness to community need would be slower. For the same reason, improvement in quality of in-home care for patients would be slower.

Conclusion

Application of the decision-making criteria, and taking the advantages and disadvantages into account, establishing a new agency in King County was the preferred alternative." [Source: Application page 39-41]

Public Comment

None

Rebuttal Comment

None

Department Evaluation

The department concluded in the need section of this evaluation that King County can accommodate at least one more home health provider. Eden Home Health provided documentation to demonstrate the proposed project is a superior alternative. As a result, the applicant's rejection of postponing action is reasonable.

Eden Home Health provided sound reasons why the option of purchasing an existing King County agency was not pursued.

The department did not identify any other alternatives that would be considered superior in terms of cost, efficiency, or effectiveness that is available or practicable for Eden Home Health.

Since there is no construction costs to establish the home health agency, services can be provided with very little financial impact to the applicant or the community.

Taking into account the public comments related to need for additional Medicare and Medicaid home health services in King County, the department concludes that Eden Home Health application is the best available alternative for the residents of the planning area. Therefore, the department moves to step three.

Step Three:

Department Evaluation

This step is applicable only when there are two or more approvable projects. Eden Home Health’s application is the only application under review to establish a Medicare and Medicaid certified home health agency in King County. Therefore, this step does not apply.

Based on the information stated above, **this sub-criterion is met.**

(2) In the case of a project involving construction:

(a) The costs, scope, and methods of construction and energy conservation are reasonable;

Eden Home Health

As stated in the project description portion of this evaluation, this project does not involve construction. This sub-criterion is not applicable to this application.

(b) The project will not have an unreasonable impact on the costs and charges to the public of providing health services by other persons.

Eden Home Health

As stated in the project description portion of this evaluation, this project does not involve construction. This sub-criterion is not applicable to this application.

(3) The project will involve appropriate improvements or innovations in the financing and delivery of health services which foster cost containment and which promote quality assurance and cost effectiveness.

Eden Home Health

Eden Home Health provided the following statements related to this sub criterion. [Source: Application page 41-42]

“Support systems from corporate offices in Vancouver WA

Eden has developed strong central support systems for administrative and clinical functions. Among those are infrastructure and systems located in Vancouver that do not have to be re-created in each local agency office. Eden’s company-wide use of tele-health adds improved patient monitoring and tailoring home health visits to each patient’s current clinical needs.

Supporting timely access to care

The proposed development of Medicare-certified home health agency in King County will increase the availability of Medicare home health services in the planning area. Home health services are critical component of cost saving strategies for King County’s acute and post-acute hospital and

skilled nursing providers. When in-home services are not sufficiently available, inpatient's providers have difficulty discharging patients on timely basis. When a patient's condition allows discharge, it is not only wasteful of money but also of staff time to maintain the patient in the inpatient setting.

Reducing re-hospitalization and ER visits

Furthermore, when a patient recovering from an illness or injury that requires acute care is discharged to the home setting, there is an increased risk of re-injury as the patient adjusts back to the home environment with compromised functions. Sufficient in-home services and support can prevent this re-injury and reduce the risk of unnecessary re-admission to the acute setting and the resulting waste of medical care dollars. In addition, if a patient is discharged without adequate home health support in place, there is an increased risk of unnecessary emergency room visits and the additional morbidity and waste of financial resources that result."

Public Comment

None

Rebuttal Comment

None

Department Evaluation

The statements above by Eden Home Health are reasonable and the department agrees with its rationale for applying to add another Medicare and Medicaid certified home health agency in King County. If Eden Home Health's application is approved, it has the potential to improve delivery of in home services to King County residents. **This sub-criterion is met.**

APPENDIX A

EDEN SURVEY OF WEBSITES: AGENCIES LISTED BY DOH AS KING COUNTY "HOME HEALTH"

C. OFFERS NURSING IN KING COUNTY BUT NOT HOME HEALTH AIDE OR OTHER SERVICE - 14 COUNT

Agency	Notes	Offered in King County>>	Any medical/therapeutic? Which >>	RN visits?	HHA visits?	HHA RN supervised?	Therapies? Which?	MD supervised?	Offers any Home Health in King County?	Meets standards of 1987 SHP home health method?
Alliance Nursing	Adult Family Home - Nursing Only	x		x					Yes	No
American Healthcare Services	Home Care and Nursing Only	x		x					Yes	No
Amicable Health Care	Home Care Agency	x		x					Yes	No
Andelcare	Home Care Agency	x	End of life care	Nursing Care					Yes	No
Beam	Home Care Agency	x							Yes	No
Cams Homehealth	Home Care and Nursing Only	x		x					Yes	No
Care Force	Home Care and Nursing Only	x		x					Yes	No
Cascade Companion Care	Home Care and Nursing Only	x		x					Yes	No
Family Resource Home care	Home Care Agency	x		x					Yes	No
Fedelta Care Solutions	Home Care Agency	x		x					Yes	No
Home Angels	Home Care Agency	x			x				Yes	No
Personal Best Services, LLC	Home Care and Nursing Only	x		x					Yes	No
Proactive HomeCare	Home Care and Nursing Only	x		x					Yes	No
Ro Health	Home Care and Nursing Only	x		x					Yes	No

EDEN SURVEY OF WEBSITES: AGENCIES LISTED BY DOH AS KING COUNTY "HOME HEALTH"

D. MEETS MOST STATE HEALTH PLAN CRITERIA IN KING COUNTY - 4 COUNT

Agency	Notes	Offered in King County>>	Any medical/therapeutic? Which >>	RN visits?	HHA visits?	HHA RN supervised?	Therapies? Which?	MD supervised?	Offers any Home Health in King County?	Meets standards of 1987 SHP home health method?
Advanced Health Care	Home Care and Nursing Only	x		x					Yes	No
PSA Healthcare	Doesn't mention being under Physician	x		x			All		Yes	Maybe
Chesterfield Health Services	Home Care and Nursing Only	x		x	x	x			Yes	No
Health People	Home Care Agency	x		x	x	x			Yes	No

E. NOT CON-APPROVED BUT MEETS SHP CRITERIA - 9 COUNT INCLUDING 2 DUPLICATES & 1 HOSPICE/DUPLICATE

Agency	Notes	Offered in King County>>	Any medical/therapeutic? Which >>	RN visits?	HHA visits?	HHA RN supervised?	Therapies? Which?	MD supervised?	Offers any Home Health in King County?	Meets standards of 1987 SHP home health method?
Advisacare	Home Health	x		x	x	x	All	x	Yes	Yes
Careage Home Health	Home Health	x		x	x	x	All	x	Yes	Yes
Kindred at Home	Home Health and Home Care	x		x	x	x	All	x	Yes	Yes
Kindred at Home	Duplicate								Duplicate	Yes
New Care Concepts	Home Health	x		x	x	x	All	x	Yes	Yes
ResCare HomeCare	Home Health	x		x	x	x	All	x	Yes	Yes
Serengeti Care	Home Health and Home Care	x		x	x	x	All	x	Yes	Yes
Signature Home Health	Home Health	x		x	x	x	All	x	Duplicate	Yes
Wesley Homes Hospice	Hospice	x		x	x	x	All	x	Duplicate/Hospice	Duplicate/Hospice

EDEN SURVEY OF WEBSITES: AGENCIES LISTED BY DOH AS KING COUNTY "HOME HEALTH"

F. CERTIFICATE OF NEED APPROVED FOR HHA KING - 17 COUNT INCLUDING 3 DUPLICATES

Agency	Notes	Offered in King County>>	Any medical/therapeutic? Which >>	RN visits?	HHA visits?	HHA RN supervised?	Therapies? Which?	MD supervised?	Offers any Home Health in King County?	Meets standards of 1987 SHP home health method?
Assured Home Health									Yes	Yes
Brookdale Home Health									Yes	Yes
Brookdale Home Health									Duplicate	Yes
Envision Home Health	King only HHA CON								Yes	Yes
EvergreenHealth	King only HHA CON								Yes	Yes
Group Health Home Health and Hospice									Yes	Yes
Harvard Partners	King only HHA CON								Yes	Yes
Highline Home Care Services									Yes	Yes
Kindred at Home									Yes	Yes
Kindred at Home									Duplicate	Yes
Kline Galland Community Based Services									Yes	Yes
MultiCare Home Health Hospice, and Palliative Care									Yes	Yes
Providence Home Services									Yes	Yes
Providence Hospice and Home Care of Snohomish County									Duplicate	Yes
Signature Home Health									Yes	Yes
VOTO Health Care Inc	King only HHA CON								Yes	Yes
Wesley Homes Community Health Services									Yes	Yes

APPENDIX B

1987 State Health Plan Methodology - Home Health

County: King
 Years: 2018-2020

2018	Age Cohort *	County Population *	SHP Formula *	Number of Visits	=	Projected Number of Visits
	0-64	1,785,338	0.005	10		89,267
	65-79	218,575	0.044	14		134,642
	80+	66,489	0.183	21		255,516
					TOTAL:	479,425
					<i>Number of Expected Visits per Agency</i>	<i>10,000</i>
					Projected Number of Needed Agencies	47.94

2019	Age Cohort *	County Population *	SHP Formula *	Number of Visits	=	Projected Number of Visits
	0-64	1,793,556	0.005	10		89,678
	65-79	229,009	0.044	14		141,069
	80+	67,042	0.183	21		257,644
					TOTAL:	488,391
					<i>Number of Expected Visits per Agency</i>	<i>10,000</i>
					Projected Number of Needed Agencies	48.84

2020	Age Cohort *	County Population *	SHP Formula *	Number of Visits	=	Projected Number of Visits
	0-64	1,801,775	0.005	10		90,089
	65-79	239,443	0.044	14		147,497
	80+	67,596	0.183	21		259,771
					TOTAL:	497,357
					<i>Number of Expected Visits per Agency</i>	<i>10,000</i>
					Projected Number of Needed Agencies	49.74