Washington State Department of HEALTH
PO Box 47890 Olympia, WA 98504
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November 17, 2025

Jamie Brown, Chief Operating Officer
Eden Health

Robert McGuirk, Principal
RMC Consulting

Sent via email only: jbrown3@eden-health.com and rmconsulting1@qwestoffice.net

RE: Certificate of Need Application #25-22 – Eden Home Health of Spokane, Benton County

To all:

We have completed review of the Certificate of Need application submitted by Eden Home Health of Spokane. The application proposes providing Medicare and Medicaid-certified home health services to the residents of Benton County. Attached is a written evaluation of the application.

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

Project Description:
This Certificate of Need approves EmpRes Healthcare Group, Inc. dba Eden Home Health of Spokane County, LLC to expand its existing in-home services agency's service area to provide Medicare and Medicaid-certified home health services to the residents of Benton County, Washington. The services will be provided from its office located at 13305 E. Trent Ave. in Spokane Valley, WA [99216]. Home Health services available to Benton County residents include skilled nursing, physical, occupational, respiratory, and speech therapies, nutritional counseling, durable medical equipment, medical social services, IV services, applied behavioral analysis, and home health aide services.

Conditions:

1. Approval of the project description as stated above. EmpRes Healthcare Group, Inc. dba Eden Home Health of Spokane County, LLC, further agrees that any change to the

project described in the project description is a new project that requires a new Certificate of Need.
2. The EmpRes Healthcare Group, Inc. dba Eden Home Health of Spokane County, LLC will maintain certification for Benton County home health services.
3. The service area for this Medicare and Medicaid-certified home health agency is Benton and Spokane counties. EmpRes Healthcare Group, Inc. dba Eden Home Health of Spokane County, LLC must provide home health services to residents of the entire counties for which this Certificate of Need is granted.

Approved Costs:
The capital expenditure approved with this project totals $0.

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 their entirety, your application will be approved, and a Certificate of Need sent to you.

If you reject any of the above provisions, your application will be denied. The department will send you a letter denying your application and provide you information about your appeal rights.

Send your written response to the Certificate of Need Program at this email address: cn@doh.wa.gov.

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

Sincerely,

Eric Hernandez, Executive Director
Certificate of Need
Office of Community Health Systems

Attachment

EVALUATION DATED NOVEMBER 17, 2025, FOR THE CERTIFICATE OF NEED APPLICATION SUBMITTED BY EMPRES HEALTHCARE GROUP, INC. DBA EDEN HOME HEALTH PROPOSING TO EXPAND AN EXISTING HOME HEALTH AGENCY TO INCLUDE BENTON COUNTY IN ITS SERVICE AREA.

APPLICANT DESCRIPTION

EmpRes HealthCare Group, Inc. dba Eden Home Health of Spokane County

EmpRes Healthcare Group, Inc. is a for-profit Washington Limited Liability Company.[1] Eden Home Health of Spokane County, LLC (Eden) is part of a group of companies owned by EmpRes Healthcare Group, Inc. This parent company was founded in 1997, is 100% employee owned, and operates 25 healthcare facilities. These facilities provide management and consulting services to rehabilitation and post-acute care centers, assisted and independent living communities, and home health, hospice, and home care agencies throughout Arizona, California, Idaho, Montana, Nevada, Oregon, South Dakota, Washington, and Wyoming. [sources: EmpRes' website and Application, p6 and Appendix 2]

In 2014 EmpRes Healthcare Group, Inc. established its home health care division through the acquisition of Ammon, an Idaho home health agency called Amedisys Home Health. This division operates under the dba Eden Home Health. In 2014 the Eden Home Health division acquired Option Care Enterprises, a Medicare-certified home health agency formerly operated by Walgreen's Infusion Services in Whatcom, Skagit, Island, and Snohomish counties. Upon acquisition of Option Care Enterprises, Eden Home Health began instituting its management and clinical improvement protocols in Whatcom County where 70% of the acquired agency's patients at that time resided. Currently, Eden's home health subsidiaries provide skilled nursing, rehabilitation therapies, medical social services, and certified home health aide services to homebound patients throughout the Whatcom, Skagit, Snohomish, San Juan, Island, Spokane, Clark, and King counties.[2] Eden and its home health subsidiaries have approval to provide Medicare and Medicaid-certified home health services to the residents of Whatcom, Skagit, Snohomish, San Juan, Island, Spokane, Clark, and Pierce, King counties.[3] [sources: Application, p12, CN1857, CN1932, CN1832, progress report files, and certificate of need files]

For this application, EmpRes Healthcare Group, Inc. dba Eden Home Health of Spokane County, LLC is the applicant and will be referenced in this evaluation as "*Eden*," or "*the applicant."* If a Certificate of Need is issued for this project, the department recognizes that the in-home service license could be issued to Eden Home Health of Spokane County, LLC.

PROJECT DESCRIPTION

EmpRes HealthCare Group, Inc. dba Eden Home Health of Spokane County

Eden is proposing to expand Eden Home Health of Spokane County, an existing home health agency in Spokane Valley, Washington within Spokane County, to also serve patients in Benton County. This expansion would lead to an overall service area of Spokane and Benton Counties. Eden Home Health of Spokane County is located at 13305 E. Trent Ave. in Spokane Valley, WA [99216]. [source: Application p8]

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[1] Eden's Washington Secretary of State unified business identifier is 604 069 995

[2] Eden's Washington State Department of Health home health licenses include: IHS.FS.60491681, IHS.FS.60871865, IHS.FS.61014910, IHS.FS.61097918, and IHS.FS.61117985.

[3] Eden's home health certificates of need #1122, #1739, #1832, and #1857.

Eden provided the following table identifying the home health services it intends to provide in Benton County. [source: Application, p9]

Applicant's Table

x Skilled Nursing	x Occupational Therapy
x Home Health Aide	x Nutritional Counseling
x Durable Medical Equipment	x Bereavement Counseling
x Speech Therapy	x Physical Therapy
x Respiratory Therapy	x IV Services
x Medical Social Services	x Applied Behavioral Analysis
▫ Other (please describe)	

With the expectation of this Certificate of Need review being completed in December 2025, Eden Home Health would begin providing Medicare and Medicaid-certified home health services for Benton County residents in January 2026. [source: June 25, 2025, screening response, p2] For this project, full calendar year one is 2026 and year three is 2028.

There is no capital expenditure associated with expanding Medicare and Medicaid hospice services to include Benton County residents. The proposed agency will occupy a portion of the current site. Since the new agency will operate at the same location as their current agency, it is reasonable that there are no capital expenditure costs. [source: Application, p7]

Public Comment

The department received the following comment critical of Eden's proposed project and validity. [source: Public Comment, pp1-3]

"The Department issued screening questions on April 24, 2025, with a deadline for Eden to respond on or before June 9, 2025.4 Per WAC 246-310-090(2)(c), Eden was required to respond on or prior to the assigned deadline with one of three responses:

> *1. Submit written supplemental information with a request to continue screening until the information is complete.*
> *2. Submit written supplemental information with a request to begin the review regardless of whether the information is complete.*
> *3. Submit a written request to review the incomplete application without supplemental information.*

However, to the best of Providence's knowledge, Eden did not submit any written response by the assigned deadline. The application record available on the Department's Box website also shows that at no time prior to June 9, 2025, did Eden file a written request for an extension, which would have served to change the screening deadline for supplemental information. Therefore, due to Eden's failure to either (1) comply with the June 9, 2025, deadline or (2) request an extension of the deadline, its application should have been deemed incomplete by the Department and returned in accordance with WAC 246-310-090(2)(b):

> ***The department shall return an incomplete certificate of need application to the person submitting the application if the department has not received a response** to a request for the supplemental information sent in accordance with subsection (1)(c) of this section within forty-*

five days for emergency, expedited, and regular reviews unless extended by mutual agreement, and within one month for concurrent review after such request was sent.

Again, as a point of emphasis, once the June 9, 2025, deadline passed without any written response from Eden, it no longer had a valid, active application and no further steps to screen the application or proceed with Beginning of Review should have occurred.

B. Request and Issuance of an Extension

Despite Eden no longer having an active application due to the failure to (a) submit a written request and receive approval from the Department for an extension prior to June 9, 2025, or (b) provide one of three written responses by June 9, 2025, in accordance with WAC 246-310- 090(2)(c), the Department took procedural steps that are in direct conflict with WAC 246-310-090.

On June 10, 2025, at 5:29 p.m., the Department contacted Eden via e-mail, noting that a response had not been received by the prior day's deadline and inquiring whether Eden would like to request an extension. The Department made this inquiry even though Eden no longer had an active application that was eligible for an extension. On June 11, Eden responded in the affirmative that they would like a 30-day extension.

> *In a letter dated June 11, 2025, the Department approved the extension and stated: I am confirming receipt of the **applicant's request** for an extension to respond to my April 24, 2025, request for supplemental information. This request is for the application proposing to establish a new home health agency in Benton County. Your **45-day extension** request is granted.*

It is essential to note that the extension for CN #25-22 did not arise as a result of the applicant's request, but rather was the result of a procedural error in which the Department contacted Eden about whether it would like an extension after the validity of Eden's CN application had lapsed pursuant to WAC 246-310-090(2)(b). Second, in its June 11 e-mail, Eden requested only a 30- day extension. For reasons unknown, the Department issued a 45-day extension despite there being no written record to support the issuance of an extension for this length of time.

C. Conclusion

For the reasons set forth above, Eden's CN application (#25-22) should no longer be deemed active due to its failure to provide a written response to the Department's request for supplemental information by June 9, 2025. Rather than returning the incomplete application to Eden in accordance with WAC 246-310-090(2)(b), the Department exacerbated the situation by making a significant procedural error by initiating and issuing an extension for an application that was no longer valid or active. The application is not eligible for an evaluation or approval and must be returned to the applicant."

<u>Eden provided the following rebuttal comment.</u>

"Providence in its testimony dated September 11, stated that Eden's Certificate of Need Application #CN25-22 should no longer be active because the Program did not return the application as incomplete. It is incorrect. The Program did not commit procedural error and was within its administrative authority to grant the extension. It did grant the extension and subsequently declared the application complete for public review.

WAC 246-310-090 (2) (b) states that "The department shall return an incomplete certificate of need application to the person submitting the application if the department has not received a response to a request for the supplemental information sent in accordance with subsection (1)(c) of this section within forty-five days for emergency, expedited, and regular reviews unless extended by mutual agreement . . ." Mutual agreement took place as described below.

*On May 28, 2025, Eden requested a consultation on the **CN #25-22** project in writing within the question response time. On June 5, 2025, the technical consultation was held. At that meeting, Eden stated that it would take several weeks to prepare revised financials, which was satisfactory to the Program's. attendees. On June 10, 2025, Alex Hull requested that Eden provide a firm date for submission of responses to questions. Eden complied. The Program issued a 30-day extension consistent with the technical consultation. The department responded to Eden's response and issued a 30-day extension that had been discussed in the June 5th technical consultation."*

Department's Evaluation of Eden Home Health's Application Validity

The Department finds that Eden Home Health's Certificate of Need application (CN #25-22) remains valid and active. While public comment asserted that the application should have been deemed incomplete due to the absence of a written response by the screening deadline on June 9, 2025, the Department determined that mutual agreement to extend the review period was established prior to that date. On May 28, 2025, Eden requested a technical consultation in writing within the assigned screening timeframe, and the consultation was held on June 5, 2025. During this meeting, the Department concluded that a short extension would be appropriate. This exchange constituted mutual agreement to extend the screening period.

Following the consultation, Department staff contacted Eden on June 10 to confirm a new submission date, and Eden formally requested a 30-day extension on June 11, 2025. Because the Department and applicant maintained ongoing communication and agreement throughout the screening process, the application was never abandoned or inactive. The Department concludes that it acted within its administrative authority to grant the extension, that the screening period was validly extended by mutual agreement, and that Eden's application was appropriately declared complete and advanced to public review.

APPLICABILITY OF CERTIFICATE OF NEED LAW

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

EVALUATION CRITERIA

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

In the event Chapter 246-310 WAC 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.

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 Washington 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 a regular review timeline. The following table shows a summary of the timeline used for the review of this project.

APPLICATION CHRONOLOGY

Action	Eden Home Health
Letter of Intent Received	December 27, 2024
Application Received	March 24, 2025
Department's pre-review activities • DOH 1st Screening Letter Sent • Applicant's 1st Screening Responses Received • DOH 2nd Screening Letter Sent • Applicant's 2nd Screening Responses Received	 April 24, 2025 June 25, 2025 July 28, 2025 August 1, 2025
Beginning of Review	August 7, 2025
Public Hearing	None requested or conducted
Public Comments Deadline	September 11, 2025
Rebuttal Comments Deadline	September 25, 2025
Department's Anticipated Decision Date	November 10, 2025
Department's Actual Decision Date	November 17, 2025

AFFECTED PERSONS

Affected persons are defined under WAC 246-310-010(2). To qualify as an affected person, someone must first qualify as an *interested person*, defined under WAC 246-310-010(34). Throughout the review of this application, two individuals or entities requested interested person status.

Providence Health & Services

On January 30, 2025, Providence Health & Services – Washington d/b/a Providence St. Mary Home Health (Providence) requested interested person status. Providence is a not-for-profit Catholic network of hospitals, care centers, health plans, physicians, clinics, home health care, and affiliated services. Providence submitted public comment and therefore qualifies for an interested person status.

Health Trends

Health Trends is a healthcare consulting firm that often submits requests for interested person status on behalf of another national provider of dialysis services. On May 5, 2025, a representative of the Health Trends consulting firm submitted a request for interested person status on behalf of Health Trends and did not identify any clients on whose behalf it was acting. Health Trends did not provide comments on this application and, therefore, does not qualify as an affected person.

SOURCE INFORMATION REVIEWED

- EmpRes Healthcare Group, Inc. dba Eden Home Health of Spokane County, LLC Certificate of Need application, received March 24, 2025

- EmpRes Healthcare Group, Inc. dba Eden Home Health of Spokane County, LLC first screening response, received June 25, 2025
- EmpRes Healthcare Group, Inc. dba Eden Home Health of Spokane County, LLC second screening response, received August 1, 2025
- Providence Public Comment received on September 11, 2025
- EmpRes Healthcare Group, Inc. dba Eden Home Health of Spokane County rebuttal comment received on September 18, 2025
- 1987 Washington State Health Plan
- Office of Financial Management Population Data for 2022
- Department of Health Integrated Licensing and Regulatory System database (ILRS)
- Licensing and/or survey data provided by the Department of Health's Office of Health Systems Oversight
- Licensing data provided by the Medical Quality Assurance Commission, Nursing Quality Assurance Commission, and Health Systems Quality Assurance Office of Customer Service
- CMS QCOR Compliance website: https://qcor.cms.gov/index_new.jsp
- Washington Secretary of State corporation data

CONCLUSION

EmpRes HealthCare Group, Inc. dba Eden Home Health of Spokane County

For the reasons stated in this evaluation, the application submitted by EmpRes Healthcare Group, Inc., proposing to expand Eden Home Health of Spokane County, LLC, an existing home health agency in Spokane Valley, WA within Spokane County to serve patients in Benton County is consistent with applicable criteria of the Certificate of Need Program, provided Eden agrees to the following in its entirety.

Project Description:

This Certificate of Need approves EmpRes Healthcare Group, Inc. dba Eden Home Health of Spokane County, LLC to expand its existing in-home services agency's service area to provide Medicare and Medicaid-certified home health services to the residents of Benton County, Washington. The services will be provided from its office located at 13305 E. Trent Ave. in Spokane Valley, WA [99216]. Home Health services available to Benton County residents include skilled nursing, physical, occupational, respiratory, and speech therapies, nutritional counseling, durable medical equipment, medical social services, IV services, applied behavioral analysis, and home health aide services.

CONDITIONS

1. Approval of the project description as stated above. EmpRes Healthcare Group, Inc. dba Eden Home Health of Spokane County, LLC, further agrees that any change to the project described in the project description is a new project that requires a new Certificate of Need.
2. The EmpRes Healthcare Group, Inc. dba Eden Home Health of Spokane County, LLC will maintain certification for Benton County home health services.
3. The service area for this Medicare and Medicaid-certified home health agency is Benton and Spokane counties. EmpRes Healthcare Group, Inc. dba Eden Home Health of Spokane County, LLC must provide home health services to residents of the entire counties for which this Certificate of Need is granted.

Approved Costs:

There is no capital costs associated with this project.

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's project **meets** 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.

Chapter 246-310 WAC does not contain specific 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.

Home Health Numeric Methodology-1987 Washington State Health Plan (SHP)

The SHP methodology is a five-step process outlined below that projects the number of home health agencies that will be needed in a planning area or county. [source: SHP, pB-35]

Step one: Project the population of the planning area, broken down by age cohort

Age Cohort
0-64
65-79
80+

Step two: Project the number of home health patients

This is done by multiplying each projected population age cohort by its corresponding use rate identified in the SHP.

Age Cohort	Use Rate
0-64	0.005
65-79	0.044
80+	0.183

Step three: Project number of patient visits

This is done by multiplying each age cohort's projected number of home health patients (calculated in the previous step) by the corresponding number of visits identified in the SHP.

Age Cohort	Use Rate	Visits
0-64	0.005	10
65-79	0.044	14
80+	0.183	21

Step four: Determine the projected home health agencies need

This is done by dividing the total projected number of visits by 10,000, which is the amount the SHP considers 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 specifies that fractions are rounded down to the nearest whole number.

Step five: Subtract the existing number of home health agencies in a planning area
The fifth and final step in the numeric methodology is to subtract the existing number of home health agencies providing services in the planning area from the projected number of agencies needed. This results in the net number of agencies needed for the planning area.

EmpRes HealthCare Group, Inc. dba Eden Home Health of Spokane County
Eden provided a numeric methodology for Benton County using the five steps outlined above. The applicant's methodology is summarized in the following table. [source: Application, pp17-24]

Department's Table 1
Eden's Numeric Need Methodology for Year 2028

Estimated home health agency gross need	7.2
Subtract # of home health agencies in the supply	3.0
Net need for Medicare and Medicaid home health agencies[4]	1.19
Total Net Need	**4.0**

As shown in the table, Eden's numeric methodology projects a net need for four home health agencies in Benton County by the end of year 2028.

Department Evaluation of Numeric Need for the Benton County Home Health
This section outlines the steps detailed earlier in this section and applies them to Benton County. [source: SHP, pB-35]

Step one: Project the population of the planning area, broken down by age cohort.

Department's Table 2
Numeric Need Methodology for Benton County
Step One – Project Planning Area Population by Age Cohort

Age Cohort	2026	2027	2028
0-64	183,656	185,293	186,929
65-79	30,831	31,371	31,911
80+	9,262	9,806	10,351

[source: OFM *Projections of the Population by Age and Sex for Growth Management, 2022 GMA Projections - Medium Series*]

Step two: Project the number of home health patients
The department multiplied each projected population age cohort by its corresponding use rate as identified in the SHP.

Department's Table 3
Numeric Need Methodology for Benton County
Step Two – Projected Number of Home Health Patients

Age Cohort	Use Rate	2026	2027	2028
0-64	0.005	918	926	935
65-79	0.044	1,357	1,380	1,404
80+	0.183	1,695	1,794	1,894

[4] The applicant skipped this step and went directly to total net need. It is added here for clarity.

Step three: Project number of patient visits

The department multiplied each age cohort's projected number of home health patients (calculated in the previous step) by the corresponding number of visits as identified in the SHP.

Department's Table 4
Numeric Need Methodology for Benton County
Step Three – Projected Number of Home Health Visits

Age Cohort	Use Rate	Visits	2026	2027	2028
0-64	0.005	10	9,183	9,265	9,346
65-79	0.044	14	18,992	19,325	19,657
80+	0.183	21	35,592	37,685	39,777
		Totals	**63,767**	**66,274**	**68,781**

Step four: Determine the projected home health agencies needed

The department divided the total projected number of visits by 10,000, which is the amount the SHP considers the *target minimum operating volume for a home health agency*. The resulting number represents the maximum projected number of agencies needed in Benton County. The SHP specifies that fractions are rounded down to the nearest whole number.

Department's Table 5
Numeric Need Methodology for Benton County
Step Four – Projected Number of Home Health Agencies Needed

Age Cohort	Use Rate	Visits	2026	2027	2028
0-64	0.005	10	9,183	9,265	9,346
65-79	0.044	14	18,992	19,325	19,657
80+	0.183	21	35,592	37,685	39,777
		Totals	**63,767**	**66,274**	**68,781**
		Target Minimum Operating Volume	10,000	10,000	10,000
		Number of Agencies	6.38	6.63	6.88
		Gross Number of Agencies Needed	**6**	**6**	**6**

Step five: Subtract the existing number of home health agencies in a planning area

The fifth and final step in the numeric methodology is to subtract the existing number of home health agencies providing home health services in Benton County from the projected number of agencies needed. This results in the net number of agencies needed for the county. Following is a brief description of how the department determines which agencies should be included or excluded from the numeric need methodology's supply.

It is important to note that the department adheres to the definition in the 1987 Washington State Health Plan (SHP) for a home health agency which states,

"*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.*" [source: SHP, pB-34]

Several sources are used to determine whether an agency is appropriately considered part of the supply for any county. The first used by the department is its internal database.[5] At initial licensure, renewal, or through a separate request, agencies may list or edit its service areas, number of home health full-time employees, and services provided. Each of these pieces of information is used to help determine if an agency is reasonably available and accessible to the entirety of Benton County residents.

The second source is the Certificate of Need Program's records on which agencies are Certificate of Need approved, which agencies are Medicare and Medicaid-certified, and which agencies are available and accessible to all residents of a county.

Another source considered includes an agency's response to the department's annual home health utilization surveys. In the years 2023 and 2024, the department sent utilization surveys to all licensed home health agencies in the state. The surveys requested historical admissions and visits for the preceding years, 2022 and 2023 respectively.

An additional source used in this assessment is an agency's website. The department uses the website to determine:

- if there is a site or location that is verifiably linked to the licensee;
- whether the services listed on the website are in line with the SHP's home health definition discussed earlier; and
- whether the planning area, in this review Benton County, is identified as in the agency's service area.

The attached analysis in Appendix A lists which agencies are sufficiently available and accessible for Benton County residents based on the department's review described above.

The department started with a listing of all licensed in-home services agencies. Next, the department eliminated any licenses that had a status of closed, denied licensure, expired, revoked, or suspended.

Then, agencies that did not list home health as an agency service category on their state license, or that were not serving Benton County were excluded. Next, the SHP definition of home health agency was applied.[6] Based on these factors, 42 home health agencies remained.

Of the 42 remaining agencies, three are Medicare and Medicaid certified home health agencies. The remaining 39 are considered 'licensed only' home health agencies. The three Medicare and Medicaid certified agencies will be counted in the supply.

The department's findings on these 42 agencies are detailed in Appendix A of this evaluation, including the rationale outlining each agency's inclusion or exclusion from the supply for the numeric methodology for Benton County. A summary of this analysis is in the following table.

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[5] Integrated Licensing and Regulatory System (ILRS).

[6] *"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."* [source: State Health Plan PB-34]

Department's Table 6
Summary of Determining the Existing Supply for Benton County

Applicant	One agency is excluded on this basis.
Medicare and Medicaid-certified agencies	Three agencies *counted*.
Website research shows services are limited to a special population or only parts of Benton County	19 agencies are excluded on this basis
Website research shows services exclude the agency from the SHP definition of a home health agency	9 agencies are excluded on this basis.
No website located and either no recent surveys or no Benton County admits in submitted surveys.	4 agencies are excluded on this basis.
Home health agencies exclude for other reasons.	6 agencies are excluded on this basis.

Exclusion of 42 agencies listed in Appendix A results in three remaining agencies. The following table shows the remaining licensee which is the current supply of home health agencies serving the residents of Benton County.

Department's Table 7
The Existing Supply for Benton County

Agency Name	WA DOH License Number
Tri Cities Home Health	IHS.FS.00000352
Columbia River Home Health	IHS.FS.60875683
Astria Sunnyside Home Health	IHS.FS.60724314

A summary of the department's numeric methodology is presented in the following table. The methodology and supporting data are provided as Appendix B attached to this evaluation.

Department's Table 8
Numeric Need Methodology for Benton County
Step Five – Subtract the Existing Supply

Age Cohort	Use Rate	Visits	2026	2027	2028
0-64	0.005	10	9,183	9,265	9,346
65-79	0.044	14	18,992	19,325	19,657
80+	0.183	21	35,592	37,685	39,777
		Totals	**63,767**	**66,274**	**68,781**
		Target Minimum Operating Volume	10,000	10,000	10,000
		Number of Agencies	6.38	6.63	6.88
		Gross Number of Agencies Needed	6	6	**6**
		Number of Existing Agencies	3	3	3
		Net Agencies Needed	**3**	**3**	**3**

As shown in the preceding table, the department's need methodology projects need for three additional home health agencies in Benton County by projection year 2028. Despite some minor differences in population data used, both methodologies demonstrate the need for at least one agency within Benton County. Based solely on the numeric methodology, the need for an additional home health agency in Benton County is demonstrated.

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

EmpRes HealthCare Group, Inc. dba Eden Home Health of Spokane County

Eden provided the following statements related to this sub-criterion. [source: Application, pp26-27]

"A critical issue is the overall lack of home health agency capacity in Benton County, which has negatively impacted the county's two largest home health providers. These agencies struggle to register and serve patients referred from hospitals and nursing homes — the two primary sources of home health referrals.

Figures 1 and 2 illustrate that in 2023, Benton County patients faced significantly longer wait times for home health services compared to national standards. National guidelines recommend placing eligible patients into service within two days of eligibility. However, both Tri-Cities Home Health and Columbia River Home Health fall well below this standard, whereas Eden Home Health of Spokane, which serves Spokane County, successfully meets the two-day placement benchmark."

Applicant's Figures

Figure 1: Berg Data Solutions 2023 Data
Percentage of Hospital Discharge Patients Admitted Within 2 Days of Home Health Eligibility

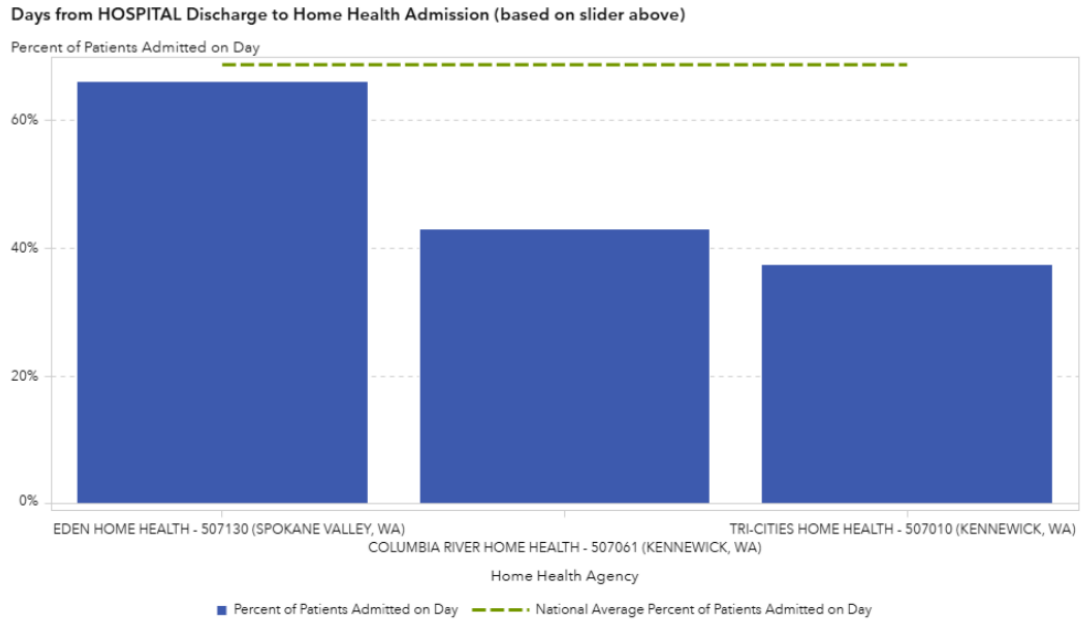
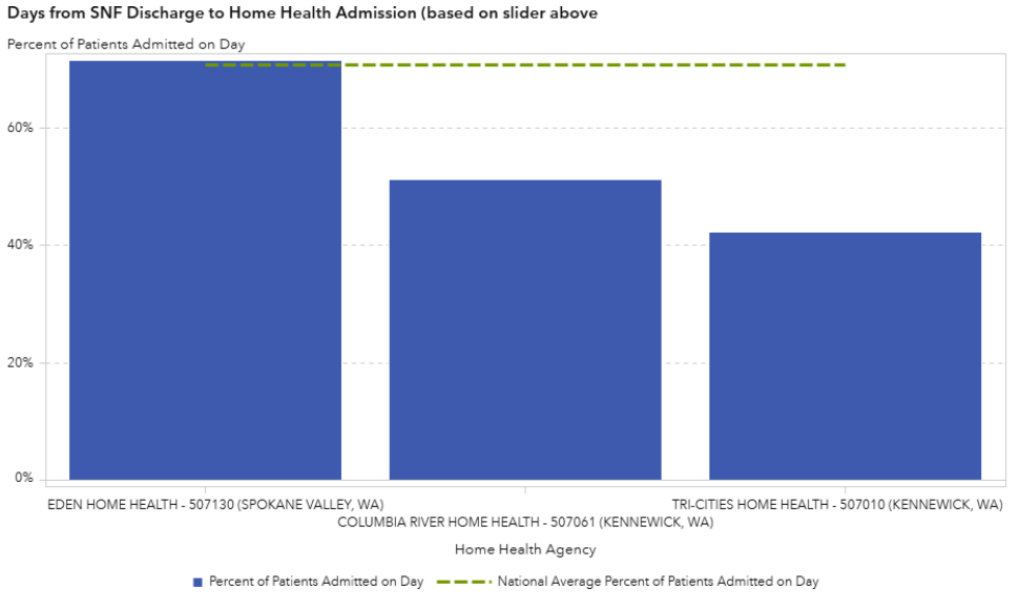


Figure 2: Berg Data Solutions 2023 Data
Percentage of SNF Discharge Patients Admitted Within 2 Days of Home Health Eligibility



Eden also provided additional specific details regarding the strategies that Eden will use to reach populations not receiving timely services. [source: June 25, 2025, screening response, pp2-4]
"Eden Home Health will implement a regionally tailored, multi-pronged strategy to ensure Benton County residents receive timely, coordinated, and high-quality home health services. This approach blends centralized efficiency with strong local presence, supported by advanced technology, experienced staff, and proven administrative systems.

Eden's Spokane home health agency has demonstrated that the approach outlined herein effectively ensures the timely delivery of home health services. On pages 26 and 27, Figure 1 and Figure 2 demonstrate that the Eden Spokane home health agency admits a significantly higher percentage of patients within 2 days of home health eligibility than the two Benton County reporting home health agencies as well as comparing favorably with the other home health agencies in Spokane County. Page 25 of Eden's application outlines key strategies, including the development of recruitment pipelines, use of Electronic Medical Records (EMR) for real-time documentation, centralized scheduling and intake support from Spokane, and partnerships with vendors such as Medline and Language Line. Additional details are provided below.

Centralized Administrative Support & Technology Infrastructure
Eden will leverage its Spokane-based administrative infrastructure to support Benton County staff with:

- ***Electronic scheduling and dispatch systems*** *that streamline clinician routing, reduce travel redundancies, and minimize patient wait times.*
- ***Telehealth capabilities*** *to support:*
    - *Remote patient triage*
    - *Ongoing monitoring and follow-up*

- *Interdisciplinary team collaboration*
- *Timely intervention for urgent but non-emergency cases*

These systems enhance care access, clinical decision-making, and resource deployment —especially important in rural areas like Benton County.

Locally Based Clinical Teams
Eden will recruit and deploy registered nurses, physical, occupational, and speech therapists, and medical social workers who reside in Benton County. While administrative functions remain centralized, all care will be delivered by local staff, ensuring community responsiveness and continuity of care.

Employee Ownership Advantage
As an employee-owned organization, Eden promotes accountability and clinician retention. This ownership model contributes to lower staff turnover and stronger continuity of patient care — which is especially important when entering new service areas.

Targeted Recruitment Strategy
To staff Benton County quickly and effectively, Eden uses:

- *Online platforms such as Indeed, Facebook, and LinkedIn*
- *Applicant tracking software (Paycor)*
- *Background checks via Assure Hire*
- *OIG compliance screening (Certiphi)*

These tools enable local recruitment while ensuring compliance with regulatory and quality standards.

Clinical Oversight & Quality Assurance
Eden integrates robust oversight tools to manage and improve care delivery, including:

- ***Home Health CAHPS*** *surveys for patient satisfaction*
- ***Strategic Healthcare Partners (SHP)*** *for performance monitoring and outcomes tracking*

Community Outreach and Referral Coordination
By 2027, Eden will employ up to two full-time Community Outreach staff in Benton County. These roles will strengthen relationships with hospitals, senior living communities, and local referral sources to support efficient care transitions.

Vendor and Technology Partnerships
Eden's operations will be supported by a suite of established vendor relationships, including:

- ***Healthstream*** *(Learning Management System)*
- ***Ignite Healthcare*** *(Patient education)*
- ***Medline*** *(Medical supplies)*
- ***Language Line*** *(Translation services)*
- ***FedEx***, ***Office Depot***, *and* ***Yolocare*** *for logistical and operational support*

Scalable Central Office Support
To avoid overstaffing and unnecessary cost burdens, Eden will phase in Spokane-based administrative support in proportion to actual patient volume growth in Benton County. This reflects a careful, sustainable expansion strategy.

Expanded Timeliness Strategies
Eden will further ensure rapid and responsive access to care through:

- ***Hiring local per diem clinicians prior to launch if required*** *to support immediate admissions while building patient census*
- ***Establishing a regional float pool*** *to reassign skilled clinicians during surges or unexpected absences*
- ***Assigning dedicated triage staff serving*** *Benton County to prioritize high-risk referrals and expedite admissions*
- ***Building formal partnerships with hospitals and discharge planners*** *to support same-day or next-day starts of care*
- ***Utilizing telehealth*** *(where clinically appropriate) for services such as social work and medication reconciliation, increasing flexibility and clinician availability*
- ***Providing 24/7 after-hours triage support*** *via shared administrative staff, ensuring continuous care coordination for patients and referral sources*

Conclusion
Eden's model is designed to provide immediate, reliable, and high-quality home health care to Benton County residents by combining centralized technology with dedicated local staffing and proven administrative practices. These strategies reflect Eden's commitment to delivering timely access to care from day one of operations."

Department Evaluation
Eden is proposing to expand its agency's current service area to include Medicare and Medicaid-certified home health services for the residents of Benton County. The applicant is already providing Spokane County Medicare and Medicaid-certified home health services from their Spokane Valley, WA location. Eden provided information to support the addition of another Medicare and Medicaid certified home health agency to Benton County.

During the review of this project, none of the other existing providers of Medicare and Medicaid home health services in Benton County provided public comments in support or opposition to the project. With no comments in opposition, the department concludes that an additional provider for Benton County would not substantially affect the existing agencies.

The department concludes that the numeric methodology and the application information support need for an additional home health agency to serve the residents of Benton County. Based on the information received, the department concludes that Eden has demonstrated need for its proposed project and **meets this sub-criterion**.

(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 who 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 ages 65 years and older. Medicaid certification is a measure of an applicant's willingness to serve low-income persons and may include people with disabilities.

Charity care policies show the 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 underinsured.

EmpRes HealthCare Group, Inc. dba Eden Home Health of Spokane County

Eden provided copies of the following policies and documents. [source: Application, Exhibits 5-8]

- Admission Policy
- Charity Care & Financial Assistance Policy
- Patient Rights & Responsibilities Policy
- Nondiscrimination Policy

Eden also provided the following statements related to this sub-criterion. [source: Application p28]
"Eden Home Health will prioritize enrolling patients to ensure they receive services within two days, aligning with the national average for both hospital and skilled nursing home referrals. Additionally, Eden's charity care policy, which offers free or discounted care to patients up to 400% of the poverty level, aligns with industry leaders. This policy supports Eden's Admissions and Non-Discrimination policies, ensuring that eligible individuals are not denied care based on income or other discriminatory factors."

Eden provided the following historical and projected payer mix percentages associated with this project. [source: Application, pp31-32] The applicant explained that the payer mix projections are based on demographic information for Benton County as well as industry experience in surrounding counties.

Department's Table 9
Eden Home Health of Spokane County, LLC Payer Mix Projections

	Benton County Only		Spokane County Only		Benton and Spokane Counties Combined	
Payer Mix	**% of Gross Revenue**	**% by Patient**	**% of Gross Revenue**	**% by Patient**	**% of Gross Revenue**	**% by Patient**

Medicare	72%	68%	72%	68%	72%	68%
Medicaid	5%	7%	5%	7%	5%	7%
Commercial/Other	22%	25%	22%	25%	22%	25%
Charity Care	2%	2%	2%	2%	2%	2%
Total	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**

As an existing agency serving Spokane County, EmpRes HealthCare Group, Inc. dba Eden Home Health of Spokane County, is already licensed and certified to provide home health services. [source: Application, pp14-15]

License Number: IHS.FS.61014910
Medicare Provider Number: 50-7130
Medicaid Provider Number: 2174015

Department Evaluation

Eden stated in its application that Eden Home Health of Spokane County will be available and accessible to all residents of Benton County. Regarding this sub criterion, Eden also provided the following statements: [source: Application, p28]

"The recently approved Vue Home Health application was largely based on a thorough and well-researched assessment conducted by various community agencies, as outlined in the 2022 Community Health Needs Assessment (CHNA). This assessment provided a comprehensive analysis of factors affecting access to home health services. Following a summary of the Vue findings accepted by the Department, Eden will present additional insights into patient access to home health services. Below is an excerpt from the Vue application:

> *'There exists considerable unmet need for additional home health agencies in Benton County. Thus, resident demand for home health programs currently outstrips the present supply, thereby constraining resident access to these necessary services. Furthermore, since home health services are, by definition, provided in the home, it is not possible for Benton County residents to out-migrate to other areas.*
>
> *One of the key inputs of the 2022 CHNA by Benton-Franklin health systems was an April 2022 community health survey of Benton and Franklin adults. The survey revealed that 16% of persons 55+ year old reported that they or someone in their household had a challenge in meeting needs for 'In-home support for seniors or people with disabilities'. In-home support was identified as the second most prevalent challenge for the 55+ age cohort (at 16%) and was within the top three main challenges for the $50K-$100K income group (12%) as well. And even though in-home support wasn't listed within the top three main challenges for the lowest income group, under $50K, in absolute terms the lower income group reported greater challenges in meeting needs (16% for under $50K compared to 12% for $50K-$100K.'*

(See page 16 of the Vue Application and Benton Franklin Health District - Community Health Survey. April 2022. P. 21.)

Another significant barrier to access is that one of the home health agencies identified by the Department does not serve the majority of Benton County residents. During Eden's evaluation of available home health providers, Astria Home Health confirmed that its services are limited to the Prosser area and do

not extend to the rest of the county. This lack of countywide coverage further restricts healthcare accessibility for residents in need of home health services." [source: Application, pp25-26]

*"Eden Home Health of Spokane County will be available and accessible to the **entire** Benton County planning area."*

Eden provided a copy of the Admissions policy that is used at Eden Home Health of Spokane County. The policy includes its purpose, criteria, procedure, and related materials. The *Admissions* policy includes language to ensure all patients would be admitted for treatment without discrimination. The policy states, *"The referral/admission policies apply to all patients admitted to the Agency without regard to race, color, creed, sex, age, handicap (mental or physical), communicable disease(s), veteran status/history, or place of national origin."* [source: Application, appendix 5]

As demonstrated above, Eden provided its historical and projected payer mix by patient and by revenue. [source: Application, pp31-33] Eden provided a sound rationale for the basis of these figures and how they are a realistic estimate for serving Benton County. Eden's pro forma financial statements also show each of these revenues are anticipated in projections.

Eden also provided its *Charity Care* policy. Within this policy, it states:

1. *"Patients will not be refused admission based on ability to pay and may be eligible for charity care at the time of admission to Eden Home Health or during the period when they receive home health services, consistent with the Income Guidelines set out below.*

2. *Eden Health staff notify patients of the option for charity care as the need is identified. Notification may occur in person, via telephone or mail/e-mail.*

3. *Admitted Patients can appeal charity care determinations according to the Patient Concerns and Grievances policy.*

4. *Eligibility for charity care under this policy is at all times contingent upon the patient's cooperation with the application process, including the timely submission of all information that Eden Home Health deems necessary or appropriate to enable it to make a charity care determination.*

5. *Patients' eligibility for free or discounted care is based on household income and family size as identified in Exhibit 1, which is updated annually, and is based on eligible services.*

    Income Level of 200% or less — 100% discount level
    Income Level of 201% to 300% — 75% discount level
    Income Level of 301% to 400% — 50% discount level."

Applicant's Table

EXHIBIT 1 2025 Poverty Guidelines: 48 Contiguous States

Household/ Family Size	100%	200%	300%	400%
1	15,650.00	31,300.00	46,950.00	62,600.00
2	21,150.00	42,300.00	63,450.00	84,600.00
3	26,650.00	53,300.00	79,950.00	106,600.00
4	32,150.00	64,300.00	96,450.00	128,600.00
5	37,650.00	75,300.00	112,950.00	150,600.00
6	43,150.00	86,300.00	129,450.00	172,600.00
7	48,650.00	97,300.00	145,950.00	194,600.00
8	54,150.00	108,300.00	162,450.00	216,600.00
9	59,650.00	119,300.00	178,950.00	238,600.00
10	65,150.00	130,300.00	195,450.00	260,600.00
11	70,650.00	141,300.00	211,950.00	282,600.00
12	76,150.00	152,300.00	228,450.00	304,600.00
13	81,650.00	163,300.00	244,950.00	326,600.00
14	87,150.00	174,300.00	261,450.00	348,600.00

Source: U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation.

[source: Application, Exhibit 6]

The policy also includes its procedure and appeals process. Additionally, the pro forma financial statements for Eden Home Health of Spokane County include charity care as a deduction from revenue.

After reviewing the information received from the applicant the department concludes this project **meets this sub-criterion**.

(3) The applicant has substantiated any of the following special 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 not residing in the health service areas in which the entities are located or in adjacent health service areas.

(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.

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

(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.

(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.

(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
The criteria under WAC 246-310-210(3), (4), and (5) do not apply to this application.

B. Financial Feasibility (WAC 246-310-220)
Based on the source information reviewed and agreement to the conditions identified in the conclusion section of this evaluation, the department determines that Eden's project **meets** the applicable financial feasibility criteria in WAC 246-310-220.

(1) The immediate and long-range capital and operating costs of the project can be met.
Chapter 246-310 WAC does not contain specific 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 direct what the operating revenues and expenses should be for projects of this type and size. Therefore, using its experience and expertise the department evaluates if an 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.

EmpRes HealthCare Group, Inc. dba Eden Home Health of Spokane County
This project proposes establishing a Medicare and Medicaid home health agency within Benton County through the expansion of an established home health agency in Spokane County. The applicant provided the assumptions used to determine the projected number of patients and visits for Benton County only as well as the projections for entire agency (Benton and Spokane counties). Eden provided the following utilization projections for its proposed Benton County home health operations. [source: June 25, 2025, screening response, pp7-8]

Department's Table 10
Eden Patient and Admission Projections
Benton County Only

	FY 2026	FY 2027	FY 2028
Number of Unduplicated Admissions	186	450	810
Average length of stay 60 days	60	60	60
Total Number of Visits	2,673	6,467	11,640

Department's Table 11
Eden Patient and Admission Projections
Spokane and Benton County

	Current Yr. 2025	Full Yr. 2026	Full Yr. 2027	Full Yr. 2028
Number of Unduplicated Admissions	1,347	1,926	2,235	2,610
Average length of stay - 60 days	60	60	60	60
Total Number of Visits	26,137	27,677	32,117	37,506

*Assumes a 1/1/2026 start date

If this project is approved, the home health agency would be operated under Eden Home Health of Spokane County, LLC and its operations would be run out of the existing office located at 13305 E. Trent Ave in Spokane Valley [99216] within Spokane County. The applicant provided several financial statements to assist the department in verifying assumptions including audited financial statements for the applicant, and financial projections for the project (Benton County) and Eden Home Health, Spokane County (Spokane and Benton counties).

Throughout the submitted financials, Eden provided extensive assumptions that were used to determine their projections. [source: June 25, 2025, screening response, pp26-32 and Application, Exhibit 9] Eden provided its Benton County revenue and expense statement showing the first three full years of operation for the new home health service area. The following table shows the first three full years, 2026 through 2028, for Benton County operations only. [source: June 25, 2025, screening response, p24]

Department's Table 12
Eden Home Health – Benton Only
Revenue and Expense Statement for Projected Years 2026 through 2028

	Year 1 2026	Year 2 2027	Year 3 2028
Net Revenue	$552,080	$1,335,677	$2,404,218
Total Expenses	$762,050	$1,470,654	$2,280,133
Net Profit / (Loss)	**$(209,970)**	**$(134,977)**	**$124,085**

In the above revenue and expense summary tables *Net Revenue* includes gross revenue minus contractual allowances, bad debt, and charity care and *Total Expenses* include direct expenses, as well as administrative costs.

To demonstrate the financial impact of the project on Eden Home Health Spokane LLC overall, the applicant also provided financial projections for Eden Home Health including its current service area, Spokane County, and the addition of Benton County, should this project be approved.

Department's Table 13
Eden Home Health – Benton and Spokane County
Revenue and Expense Statement for Projected Years 2026 through 2028

	Year 1 2026	Year 2 2027	Year 3 2028
Net Revenue	$5,716,699	$6,633,864	$7,746,929
Total Expenses	$5,734,836	$6,365,071	$7,186,963
Net Profit / (Loss)	$(39,485)	$247,445	$538,618

In the above revenue and expense summary tables *Net Revenue* includes gross revenue minus contractual allowances, bad debt, and charity care and *Total Expenses* includes direct expenses and administrative costs.

Eden also provided pro forma balance sheets for this review. Eden provided its Benton County balance sheet showing the first three full years of operation for the new home health service area. The following

table shows the first three full years, 2026 through 2028, for Benton County operations only. A summary of the balance sheet is below. [source: June 25, 2025, screening response, p25]

Department's Table 14
Eden Home Health – Benton County
Projected Balance Sheet for Years 2026 through 2028

Assets	**Year 1 2026**	**Year 2 2027**	**Year 3 2028**
Current Assets	$202,979	$343,879	$513,408
Property and Equipment	$0	$0	$0
Other Assets	$0	$0	$0
Total Assets	**$(194,593)**	**$(289,338)**	**$(123,281)**

Liabilities	**Year 1 2026**	**Year 2 2027**	**Year 3 2028**
Total Liabilities	$45,147	$85,378	$127,350
Total Equity	$(239,740)	$(374,716)	$(250,631)
Total Liabilities & Equity	**$(194,593)**	**$(289,338)**	**$(123,281)**

To demonstrate the financial impact of the project on Eden Home Health Spokane LLC overall, the applicant also provided a balance sheet for Eden Home Health including its current service area, Spokane County, and the addition of Benton County, should this project be approved.

Department's Table 15
Eden Home Health – Benton & Spokane Counties
Projected Balance Sheet for Years 2026 through 2028

Assets	**Year 1 2026**	**Year 2 2027**	**Year 3 2028**
Current Assets	$1,111,069	$1,411,147	$2,013,832
Property and Equipment	$42,696	$21,348	$0
Total Assets	**$1,153,765**	**$1,432,495**	**$2,013,832**

Liabilities	**Year 1 2026**	**Year 2 2027**	**Year 3 2028**
Total Liabilities	$323,981	$355,266	$397,986
Total Equity	$829,784	$1,077,230	$1,615,846
Total Liabilities & Equity	**$1,153,765**	**$1,432,495**	**$2,013,832**

Department Evaluation

Utilization Assumptions

An applicant's utilization assumptions are the foundation for the financial review under this sub-criterion. The department first reviewed the assumptions used by Eden to determine the projected number of patients and visits for the proposed expansion into Benton County. Projections were based on

a percentage of the unmet need in Benton County, average visits per patient, and modest increases annually. Using an estimated 14 visits per patient, Eden projected its annual visits. Based on these assumptions, calculations, and lack of objection in public comment, the department concludes that Eden's utilization assumptions are reasonable.

Pro Forma Financial Statements

The applicant provided pro forma financial statements, including its revenue and expense statements and balance sheets to allow the department to evaluate the financial viability of the proposal. Eden relied on its experience and expertise to determine expenses for Benton County services.

The new agency will be located within Eden's existing home health agency building in Spokane. The applicant provided a lease agreement with a commencement date of July 18, 2021, as well as a lease addendum that extends the lease through November 30, 2029. In screening, Eden provided updated lease expenses for known costs of the lease through December 2028.

Further, Eden Home Health identified Gilson Girotto, D.O. as the medical director and provided a medical director agreement. The agreement has an effective date of May 1, 2020, and is renewed annually.

Based on the information submitted by the applicant and the lack of public comment related to this this sub-criterion, the department concludes that the immediate and long-range operating costs of Eden's 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.

Chapter 246-310 WAC does not contain specific 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 direct what an unreasonable impact on costs and charges would be for projects 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.

EmpRes HealthCare Group, Inc. dba Eden Home Health of Spokane County

Eden provided the following statements relating to this sub-criterion. [source: Application p30]

"This application has no associated capital costs. Eden Home Health, Inc. is responsible for any estimated capital expenses."

Department Evaluation

The estimated capital expenditure and start-up costs for this project is $0.

The department does not have an adopted standard on what constitutes an unreasonable impact on charges for health services. Medicare patients typically make up the largest percentage of patients served by home health care agencies. For this project, the applicant projected that 68% of its patients would be eligible for Medicare reimbursement, and gross revenue from Medicare is projected to be 72% of total revenue. Consequently, standard reimbursement amounts, and related discounts are not likely to increase with the approval of this project.

Based on the information reviewed and the lack of public comment, the department concludes that approval of this project is not expected to have an unreasonable impact on the costs and charges of healthcare services in the planning area. **This sub-criterion is met.**

(3) The project can be appropriately financed.
WAC 246-310-220(3) 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 direct how projects of this type and size should be financed. Therefore, using its experience and expertise the department compared each proposed project's source of financing to those previously considered by the department.

EmpRes HealthCare Group, Inc. dba Eden Home Health of Spokane County
Eden identified capital expenditure and start-up costs of $0.

Eden also provided historical financials of Eden Home Health of Spokane County for the years 2022-2024 and a copy of its audited financial statements for 2023 to demonstrate sufficient reserves to finance the project. [source: Application, Appendices 9c & 12]

Department Evaluation
There is no funding associated with this project. However, the applicant provided a letter from Michael J. Miller, Executive Vice President and Chief Financial Officer of Eden Healthcare Management, stating that Eden has committed the necessary working capital to finance the expansion of home health services in Benton County.

The department concludes that this project **meets this sub-criterion**.

C. Structure and Process (Quality) of Care (WAC 246-310-230)
Based on the source information reviewed and agreement to the conditions identified in the conclusion section of this evaluation, the department determines that Eden's project **meets** the applicable structure and process 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.
Chapter 246-310 WAC does not contain specific 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 specify staffing patterns or numbers of FTEs that should be employed for projects of this type or size. Therefore, using its experience and expertise the department determines if the planning area would allow for the required coverage.

EmpRes HealthCare Group, Inc. dba Eden Home Health of Spokane County
Eden currently operates in-home service agencies throughout Washington State. With this project, Eden proposes expanding its Spokane County agency's current service area to include Medicare and Medicaid-certified home health services for the residents of Benton County, from its offices in Spokane Valley, within Spokane County. Eden provided the following information and tables related to staffing. [source: June 25, 2025, screening response, p11 and Application, pp34-35]

Applicant's Tables

Benton County Expansion Staffing Levels

STAFFING INPUT - BY FTE'S		2026	2027	2028
OPERATIONS				
Physician (Medical Director)	contracted			
Director of Professional Services	$ 130,000	0.10	0.20	0.31
Clinical Supervisor	$ 95,000	1.00	1.00	1.00
Nursing	60.00	0.74	1.80	3.24
Pysical Therapy	66.00	0.88	2.14	3.84
Occupational Therapy	48.00	0.35	0.84	1.51
Speech Therapy	54.00	0.06	0.16	0.28
Social Worker (MSW)	65.00	0.04	0.10	0.19
HHaide	30.00	0.00	0.01	0.01
TOTAL		**3.18**	**6.24**	**10.38**
ADMINISTRATIVE				
Administrator	156,000	0.10	0.20	0.31
Office Manager	58,240	-	-	-
Home Care Specialist	46,800	1.00	1.00	1.00
Team Assistant	46,800	0.50	0.75	1.00
Data Entry Clerk	-	-	-	-
Community Outreach	85,000	1.00	2.00	2.00
TOTAL	**0**	2.60	**3.95**	**4.25**
TOTAL FTE'S		**5.78**	**10.19**	**14.63**

Staffing Summary -Spokane Overall Agency FTE's

STAFFING INPUT - BY FTE'S	2021	2022	2023	2024	Current	2026	2027	2028
OPERATIONS								
Physician (Medical Director)	Contract	Contract	Contract	Contract	Contract	Contract	Contract	Contract
Director of Professional Services	0.6	1.0	1.0		1.0	1.0	1.0	1.0
Clinical Supervisor	0.5	1.0	1.0		2.0	3.0	3.0	3.0
Home Care Specialist	0.5	0.7	0.6		6.0	7.0	7.0	7.0
RN*	1.6	3.0	2.7		7.3	7.6	8.9	10.4
LPN	0.1	1.3	1.8					
PT & PT Asst.	0.5	5.2	6.7		8.7	9.1	10.6	12.4
OT & OT Asst.	0.2	3.0	2.6		3.4	3.4	4.2	4.9
Speech Therapy	0.1	0.2	0.3		0.6	0.5	0.8	0.9
MSW	0.2	0.3	0.3		0.4	0.4	0.5	0.6
HHaide	0.0	0.0	0.0		0.0	0.0	0.0	0.0
SUBTOTAL	**4.4**	**15.7**	**16.9**		**29.4**	**32.0**	**36.0**	**40.2**
ADMINISTRATIVE								
Administrator	0.0	0.0	0.5		0.5	0.5	0.6	1.0
Office Manager	1.0	1.0	1.0		1.0	2.0	2.0	2.0
Home Care Specialist	2.0	2.8	2.0		6.0	7.0	7.0	7.0
Team Assistant	1.0	2.0	3.7		1.0	1.0	1.0	2.0
Data Entry Clerk	0.0	0.0	0.0		0.0	0.0	0.0	0.0
Community Outreach	1.7	2.0	2.0		3.0	3.0	4.0	4.0
SUBTOTAL	**5.7**	**7.8**	**9.2**		**11.5**	**13.5**	**14.6**	**16.0**
TOTAL FTE'S	**10.1**	**23.6**	**26.2**		**40.9**	**45.5**	**50.6**	**56.2**

Eden provided the two staffing tables shown above to demonstrate the impact of expanding its home health services to include Benton County. The table labeled *"Benton County Staffing Levels"* shows the

projected staffing for the proposed agency in Benton County only, while the table labeled *"Spokane Overall Agency FTE's"* shows the historical staffing for Eden's Spokane County Home Health operations and the projected staffing for Benton and Spokane counties combined once Benton is added to its service area.

Eden provided additional statements on why these staffing projections are reasonable. [source: Application pp35-37]

"Five key assumptions were used to project the number and types of full-time equivalents (FTEs) involved in direct care:

1. *Patient visits categorized by clinical discipline.*
2. *Number of visits per discipline within an 8-hour shift (productivity).*
3. *Total visits calculated for each variable treatment volume discipline.*
4. *Inclusion of semi-variable volume clinical treatment FTEs.*
5. *Addition of administrative positions."*

Applicant's Tables

Step 1: Patient Visits by Clinical Discipline

STAFFING INPUT - BY VISITS		2025	2026	2027	2028
Total Visits		278	2,673	6,467	11,640
RN	36.2%	101	968	2,342	4,216
PT	43.0%	119	1,149	2,781	5,006
OT	16.9%	47	452	1,094	1,968
ST	2.5%	7	67	162	292
MSW	1.3%	3	33	81	146
HHaide	0.1%	0	3	7	12
SUBTOTAL		**278**	**2,673**	**6,467**	**11,640**

Step 2: Visits Per Discipline in an 8-Hour Shift

		2025	2026	2027	2028
VISITS PER 8 HOUR SHIFT		**278**	**2,673**	**6,467**	**11,640**
Skilled Nursing	5.0	5.0	5.0	5.0	5.0
Physical Therapy	5.0	5.0	5.0	5.0	5.0
Occupational Therapy	5.0	5.0	5.0	5.0	5.0
Speech Pathology	4.0	4.0	4.0	4.0	4.0
Medical Social Service	3.0	3.0	3.0	3.0	3.0
Home Health Aide	5.0	5.0	5.0	5.0	5.0

Step 3: Calculate Total Visits in Each Variable Treatment .Volume Discipline per Year by Multiplying Visits per Discipline in Step 1 by Visits per Shift and Divide by 260.4 Shifts per Year

FTES PER YEAR		2025	2026	2027	2028
		260.4 Clinical Shifts			
Skilled Nursing		0.1	0.7	1.8	3.2
Physical Therapy		0.1	0.9	2.1	3.8
Occupational Therapy		0.0	0.3	0.8	1.5
Speech Pathology		0.0	0.1	0.2	0.3
Medical Social Service		0.0	0.0	0.1	0.2
Home Health Aide		0.0	0.0	0.0	0.0
SUBTOTAL: DIRECT		**0.2**	**2.1**	**5.0**	**9.1**

Step 4: Add Semi-variable Clinical Staffing

STAFFING INPUT - BY FTE'S	2025	2026	2027	2028
OPERATIONS				
Physician (Medical Director)				
Director of Professional Services	0.50	0.50	0.50	0.50
Clinical Supervisor	-	1.00	1.00	1.00
Home Care Specialist	0.50	1.00	1.00	1.00
Subtotal Semi-volume based Clinical	1.00	2.50	2.50	2.50

Step 5: Add Administrative and Support Staff

ADMINISTRATIVE	2025	2026	2027	2028
Administrator	0.33	0.33	0.36	0.50
Office Manager	0.50	1.00	1.00	1.00
Home Care Specialist	0.50	1.00	1.00	1.00
Team Assistant	0.50	1.00	1.00	1.00
Data Entry Clerk	-	-	-	-
Community Outreach	1.00	1.00	2.00	2.00
SUBTOTAL	**2.83**	**4.33**	**5.36**	**5.50**
TOTAL FTE'S	**4.70**	**8.91**	**12.90**	**17.07**

Eden provided the following statements related to recruitment and retention of staff. [source: Application, pp38-39]

"As a large multi-state organization, Eden has extensive visibility and connections across various job markets within the home health and hospice sectors. Specifically in Benton County, Eden leverages both local recruitment strategies and its broader industry expertise to attract and retain qualified staff.

- *As an employee-owned organization, Eden experiences lower turnover rates compared to many other healthcare providers.*
- *The EmpRes commitment to both employees and residents, reflected in its company name, is also a core management principle, prioritizing staff, and patient well-being as key to overall success.*

Since this application seeks to expand Eden Health Spokane's Medicare-Medicaid certified service area to include Benton County, central office recruitment will be incremental. This approach ensures that existing providers are not adversely affected, and that Eden can effectively serve home health patients in Benton County.

To recruit, train, and retain staff while maintaining compliance with federal and state healthcare regulations, Eden utilizes a comprehensive suite of employment resources, including:

- ***Learning Management System*** *– Healthstream*
- ***Online Patient Education*** *– Ignite Healthcare*
- ***Recruiting Platforms*** *– Indeed, Facebook, LinkedIn, and other social media channels*
- ***Applicant Tracking System*** *– Paycor*
- ***Background Checks*** *– Assure Hire*
- ***OIG Compliance Screening*** *– Certiphino Screening"*

Department Evaluation

Eden currently operates several in-home services agencies in Washington State and based its Benton County staffing assumptions experience from these operations. As a current healthcare provider, Eden has a general understanding of the appropriate staffing necessary to expand its Medicare and Medicaid home health service area. This approach to staffing is reasonable.

Based on these assumptions, Eden anticipates 8.9 FTEs will be required to serve Benton County in full year one (2026), and 17 FTEs will be necessary by its third full year of operation (2028). These FTEs represent new staff that will be recruited for Benton County home health services. The pro forma identifies all costs associated with this staffing plan.

Eden will use recruitment and retention methods it has found successful in the past, such as social media, recruitment platforms, and staff networking and referrals. Eden's retention strategies include continuing education, competitive employee benefits, education reimbursement programs, and development plans. These recruitment and retention strategies are reasonable.

The applicant identified Gilson Girotto, D.O., as the medical director and is not an employee of the facility. [source: Application p38]

Based on the above information, the department concludes that Eden 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.

Chapter 246-310 WAC does not contain specific 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 certified and Medicaid eligible. Therefore, using its experience and expertise the department assessed the applicant's ability to establish and maintain appropriate relationships.

EmpRes HealthCare Group, Inc. dba Eden Home Health of Spokane County

Eden provided the following information related to this sub-criterion and stated that the listed working relationships would not change as a result of this project. The following is a list of ancillary and support service vendors already in place at Eden Home Health of Spokane County. [source: Application, pp40-41]

"The Eden Home Health of Spokane agency currently works with the following facilities in Spokane:

- *Assisted Living Facilities*

        - *Avamere at South Hill*
        - *Bethany Place*
        - *Brookdale Nine Mile*
        - *Cherrywood*
        - *Colonial Court*
        - *Fairwinds*
        - *Fields Senior Living*
        - *Northpoint Village*
        - *Orchard Crest*
        - *Riverview Memory Care*
        - *Rockwood Retirement*
        - *Royal Park Retirement Center*
        - *The Cottages of Spokane*
    - *Hospital*
        - *Kootenai Medical Center*
        - *VA Hospital*
        - *Multicare*
        - *Newport Hospital*
        - *Providence*
        - *Pullman Regional Hospital*
        - *Valley Medical Center*
    - *SNF/Rehab/Nursing Home*
        - *Aurora Valley Care*
        - *Alderwood Manor*
        - *Avalon Care Center*
        - *Cheney Care Center*
        - *Coeur d'Alene Health of Cascadia*
        - *Life Care Center Post Falls*
        - *North Central Care Center*
        - *Olympus Living at Spokane*
        - *Spokane Falls Care*
        - *Spokane Health and Rehab*
        - *St Joseph Care Center*
        - *Sullivan Park*
        - *Sunshine Health and Rehab*
        - *Touchmark*
        - *Ivy Court*
        - *Regency at Northpointe*
        - *Royal Park Health and Rehab*
        - *St Lukes Rehabilitation"*

Eden also provided a list of healthcare facilities it will establish relationships with in Benton County. [source: Application, Appendix 20]

Applicant's Table

Benton County Acute Care Provider

Name	Type	Address	City	ZipCode
Kadlec Regional Medical Center	Hospital	888 Swift Boulevard	Richland	99352
Lourdes Counseling Center	Hospital	1175 Carondelet Drive	Richland	99354
Prosser Memorial Health	Hospital	723 MEMORIAL ST	Prosser	99350
Trios Southridge Hospital	Hospital	3810 Plaza Way	Kennewick	99338

Benton County Post-Acute Care Providers

Includes Assisted Living Facilities (ALF) and Nursing Homes (NH)

Name	Type	Address	City	ZipCode
Amber Hills Assisted Living	ALF	125 N Wamba Rd	Prosser	99350
BONAVENTURE OF THE TRI-CITIES	ALF	1800 BELLERIVE DRIVE	RICHLAND	99352
Brookdale Canyon Lakes	ALF	2802 W 35TH AVE	KENNEWICK	99337
Brookdale Meadow Springs	ALF	770 Gage Blvd	Richland	99352
Brookdale Richland	ALF	1629 George Washington Way	Richland	99354
Brookdale Torbett	ALF	221 Torbett St	Richland	99354
Callaway Gardens Alzheimers Special Care Center	ALF	5505 W Skagit Ct	Kennewick	99336
CIELS SENIOR LIVING OF TRI CITIES	ALF	7255 W Grandridge Blvd	Kennewick	99336
CIELS SENIOR LIVING MEMORY CARE	ALF	575 N Young St	Kennewick	99336
GUARDIAN ANGEL HOMES (THE COTTAGE)	ALF	245 Van Giesen St	Richland	99354
HAWTHORNE COURT	ALF	524 N Ely St	Kennewick	99336
Parkview Estates	ALF	7820 W 6th Ave	Kennewick	99336
Prestige Assisted Living at Richland	ALF	1745 Pike Ave	Richland	99354
NORTHCARE ASSISTED LIVING, FISHER	ALF	520 N FISHER STREET	KENNEWICK	99336
NORTHCARE ASSISTED LIVING, HOXIE	ALF	1939 Hoxie Ave	Richland	99354
NORTHCARE ASSISTED LIVING, OLYMPIA	ALF	1208 W 11TH PL	KENNEWICK	99337
NORTHCARE ASSISTED LIVING 110TH	ALF	3321 110TH AVENUE	KENNEWICK	99336
NORTHCARE PASCO	ALF	5921 ROAD 60 DRIVE	PASCO	99301
Royal Columbian Senior Living	ALF	5615 W Umatilla Ave	Kennewick	99336
Ruan's Garden	ALF	3502 W 4th Ave	Kennewick	99336
SUN TERRACE PROSSER	ALF	2131 WINE COUNTRY ROAD	PROSSER	99350
Three Rivers Place Senior Living	ALF	1108 W 5th Ave	Kennewick	99336
Windsong at Southridge	ALF	4000 W 24th Avenue	Kennewick	99338
LIFE CARE CENTER OF KENNEWICK	NH	1508 W 7TH AVE	KENNEWICK	99336
LIFE CARE CENTER OF RICHLAND	NH	44 GOETHALS DR	RICHLAND	99352
Regency Canyon Lakes Rehabilitation and Nursing Center	NH	2702 S Ely St	Kennewick	99337
RICHLAND REHABILITATION CENTER	NH	1745 PIKE AVE	RICHLAND	99354

Additionally, Eden provided the following information regarding patients' access to services. [source: Application, p39]

"*Office hours are from 8:30 a.m. to 5:00 p.m., with 24-hour phone access provided through Telemed Answering Service for after-hours support.*"

Department Evaluation

Eden has been providing Medicare and Medicaid-certified in-home services in Washington State for many years. With this project, Eden proposes to continue to provide Medicare and Medicaid-certified home health services to patients residing in Spokane County from its offices in Spokane Valley and expand its services to include Benton County. Eden already has established working relationships to support this project and does not expect any of them to change by adding Benton County home health services.

Information provided in the application demonstrates that the applicant has the ability and expertise to permanently expand its in-home service area to include home health for Benton County residents with its existing network of relationships. Based on the information reviewed, the department concludes this project **meets 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.

Chapter 246-310 WAC does not contain specific criteria as identified in WAC 246-310-200(2)(a)(i). There are no known recognized standards identified in WAC 246-310-200(2)(a)(ii) and (b) that a facility must meet when it is to be Medicare certified and Medicaid eligible. 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.

As part of this review, the department must also conclude that the proposed services provided by an applicant would be provided in a manner that ensures safe and adequate care to the public.[7] To accomplish this task, the department reviews the quality of care compliance history for all Washington State and out-of-state healthcare facilities owned, operated, or managed by an applicant, its parent company, or its subsidiaries.

For home health agencies, the department reviews two different areas when evaluating this sub-criterion. One is a review of the Centers for Medicare and Medicaid Services (CMS) *Terminated Provider Counts Report* covering years 2020 through current. The department uses this report to identify agencies that were involuntarily terminated from participation in Medicare reimbursement.

The department also reviews an applicant's conformance with Medicare and Medicaid standards, with a focus on Washington State facilities. The department uses the CMS *Survey Activity Report* to identify Washington State facilities with a history of condition-level findings. For CMS surveys, there are two levels of deficiencies: standard and condition.[8]

Standard Level

A deficiency is at the Standard level when there is noncompliance with any single requirement (or several requirements) within a particular standard that is not of such character as to substantially limit a facility's capacity to furnish adequate care, or which would not jeopardize or adversely affect the health or safety of patients if the deficient practice recurred.

Condition Level

Deficiency at the Condition level may be due to noncompliance with requirements in a single standard that, collectively, represent a severe or critical health or safety breach, or the result of noncompliance with several standards within the condition. Even a seemingly small breach in critical actions, or at critical times, can kill or severely injure a patient and such breaches would represent a serious or severe health or safety threat.

[7] WAC 246-310-230(5)

[8] Definitions of standard and condition level surveys: https://www.compass-clinical.com/deciphering-tjc-condition-level-findings/

Although the applicant is affiliated with many types of health care facilities and services, the proposed project is for home health services. Therefore, the focus of this review will be historical hospice and home health operations, as they are either the same or functionally the most similar to the services proposed by this project.

EmpRes HealthCare Group, Inc. dba Eden Home Health of Spokane County

When asked about criminal convictions, revocation of a license, and decertification histories Eden provided the following statement. [source: Application, p41]
"There is no history of actions described above"

In addition to the statements above, Eden provided a listing of all owned and operated facilities, including those recently acquired. [source: Application, Appendix 3]

Eden provided information regarding its method for assessing customer satisfaction and quality improvement for its existing hospice agencies. [source: Application, p39]
"Eden Home Health of Spokane utilizes the Home Health Care CAHPS (HHCAHPS) Survey, a standardized national tool designed to assess the experiences of patients receiving home health care from Medicare-certified agencies. This survey is the first of its kind to provide publicly reported data on patients' perspectives regarding skilled home care services. It is one of the services provided to Eden through its partnership with Strategic Healthcare Partners (SHP).

Eden Health partners with SHP as its performance improvement and outcomes vendors specializing in support for modern post-acute care providers, hospitals, and physician groups."

Department Evaluation

As stated in the *Applicant Description* section of this evaluation, EmpRes HealthCare Group, Inc. owns EmpRes Home and Hospice, LLC, which owns Eden Home Health, LLC, which in turn owns Eden Home Health of Spokane County, LLC d/b/a Eden Home Health. Eden Home Health would continue to provide home health services in Spokane County after the proposed service area expansion to Walla Walla County. Based on the ownership structure, EmpRes HealthCare Group, Inc is the applicant for this project.

EmpRes HealthCare Group, Inc., offers several post-acute lines of service which include in-home care through its subsidiary EmpRes Home and Hospice, LLC.

Through its subsidiaries, EmpRes operates 2 home care agencies, 11 hospice agencies, and 12 home health agencies nationally. Since the proposed project is for home health services, the focus of this review will be home health and hospice operations as they are either the same or functionally the most similar to the services proposed in this project. The table below shows the EmpRes-owned home health or hospice agencies broken down by 8 states.

Department's Table 15
EmpRes Home Health or Hospice Agencies

State	# of Agencies
Arizona	2
California	1
Idaho	4

Montana	2
Nevada	3
Oregon	3
Washington	8
Wyoming	2

Terminated Provider Counts Report for EmpRes HealthCare Group, Inc

Focusing on the years 2022 through 2025, none of EmpRes' hospice or home health agencies were involuntarily terminated from participation in Medicare reimbursement. [source: CMS Quality, Certification, and Oversight Reports and CMS Internet Quality Improvement & Evaluation System as of October 30, 2025]

Conformance with Medicare and Medicaid Standards for EmpRes HealthCare Group, Inc

Using the Center for Medicare and Medicaid Services (CMS) Quality, Certification & Oversight Reports (QCOR) website, the department's review included full year 2022. The department also reviewed available data from the CMS Internet Quality Improvement & Evaluation System (iQIES) for first quarter 2023 through second quarter 2025[9] for home health and hospice agencies in all 12 states.

Of the 25 agencies, 17 were not surveyed during the timeframe identified above. Of the remaining 8 agencies, four had one or more standard surveys and four had findings that did not require follow-up. All agencies are currently certified for Medicare and Medicaid.

Washington State Healthcare Agencies

Focusing on its Washington State facilities, EmpRes subsidiaries operate a total of eight separate agencies in the counties of King (2), Whatcom (3) Clark (1), Spokane (1), and Snohomish (1). Two of the eight agencies were surveyed between 2022 and 2025 and had zero deficiencies with no required follow-up surveys.

In summary, since the year 2022, none of EmpRes' home health or hospice agency surveys resulted in termination from participation and all deficiencies were resolved.

Eden provided a copy of its executed *Medical Director Agreement* with Gilson Girotto, DO. The agreement was executed May 1, 2020, identifies the entities associated with the agreement, outlines roles and responsibilities for both the physician and the agency, and specifies its terms.

Eden provided a copy of its *Management Agreement* between Eden Healthcare Management, LLC. and its subsidiaries. The agreement was executed on January 1, 2023, identifies the entities associated with the agreement, outlines roles and responsibilities for all entities, and specifies the agreement's terms. The agreement is used to ensure the new agency will have consulting services available from its parent.

In review of this sub-criterion, the department considered the total compliance history of the EmpRes organization, by reviewing agencies owned and operated by its subsidiaries which are similar in function to in-home hospice services.

[9] As of October 2025, QCOR displayed the message "Due to systems migrations, hospice provider and survey information will only be accurate and complete through September 29, 2022" when reviewing hospice survey information.

Based on the information reviewed, the department concludes that Eden has been operating in compliance with applicable state and federal licensing and certification requirements. The department also concludes there is reasonable assurance that the applicant's proposed Benton County agency would be operated in compliance with state and federal requirements and not cause a negative effect on the compliance history of Eden. The department concludes that this project **meets this sub-criterion.**

(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.

Chapter 246-310 WAC does not contain specific 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 projects of this type and size. Therefore, using its experience and expertise the department assessed the materials in an application.

EmpRes HealthCare Group, Inc. dba Eden Home Health of Spokane County

Eden provided the following statements related to this sub-criterion. [source: Application, pp41-44]

*"**Overview:***

Building awareness in smaller metropolitan and rural areas requires a strategic, multi-faceted approach that prioritizes personal outreach, trust-building, and consistent messaging. By collaborating with local healthcare providers, engaging in community events, utilizing both traditional and digital media, and sharing impactful patient stories, Eden can establish a strong presence in south-central Washington's rural communities. The key is to become a trusted local resource—the first choice for individuals seeking home healthcare guidance and support. Over time, this trust and visibility will foster steady growth and solidify Eden's reputation as a reliable and compassionate provider in the community.

1. Develop Local Partnerships and Referrals

a. Collaborate with Local Medical Providers

- *Coordinate with physicians, clinics, hospitals, and rehabilitation centers in the area.*
- *Provide educational materials about our services (e.g., brochures, flyers).*
- *Offer to host or participate in continuing education sessions or health seminars at local clinics.*

b. Build Relationships with Social Service Agencies

- *Partner with agencies such as senior centers, churches, and non-profit organizations that work with older adults, individuals with disabilities, and other populations needing homehealth.*
- *Present services during their events or meetings to reach potential clients and caregivers.*

c. Connect with Pharmacies and Medical Supply Stores

- *Place brochures or business cards at pharmacies and stores that sell home medical equipment.*
- *Offer to share educational content about medication management or safe-home setups.*

2. Engage in Community Outreach

a. Attend and Sponsor Local Events

- *Look for health fairs, county fairs, or community festivals where you can set up a booth.*

- *Provide free blood pressure checks, glucose screenings, or simple wellness tips to demonstrate value and generate leads.*
- *Sponsor or co-sponsor small local events to show our commitment to the community.*

b. Host Informational Seminars or Workshops

- *Organize workshops on topics such as caring for aging parents, diabetes management, fall prevention, and more.*
- *Invite local experts (e.g., dietitians, physical therapists) to speak alongside our staff.*
- *Offer these sessions at libraries, community centers, churches, or even virtually (for those with limited mobility).*

c. Volunteer and Join Community Groups

- *Encourage staff to volunteer with local charities or community organizations; wearing company-branded T-shirts can gently reinforce brand awareness.*
- *Participate in service clubs such as Rotary or Lions Clubs to expand networks and visibility.*

3. Leverage Local Media Outlets

a. Regional Newspapers and Radio Stations*"*

- *Pitch human-interest stories to local newspapers or radio stations highlighting how home healthcare services help families in rural areas (e.g., stories about clients whose quality of life has improved).*
- *Purchase print or radio ad spots focusing on the unique benefits of receiving care at home.*

b. Community Newsletters and Bulletins

- *Many small towns have newsletters, church bulletins, or community magazines. Offering an article, ad, or sponsored content can be highly effective.*
- *Keep the language simple, clear, and directly relevant to community needs.*

4. Optimize Digital Presence

a. Local SEO (Search Engine Optimization)

- *Ensure Eden's HH website is optimized for local searches: use location-specific keywords (e.g., "home healthcare in south-central Washington").*
- *Register Eden Health with Google Business Profile and keep it updated with current hours, contact information, and customer reviews.*
- *Encourage satisfied clients or their family members to leave reviews online.*

b. Targeted Social Media Advertising

- *Facebook and Instagram ads can be targeted by location and demographics (e.g., adult children of seniors, individuals with certain health conditions).*
- *Share patient success stories (with permission), staff spotlights, and educational content.*

c. Informational Content Marketing

- *Post blog articles or short videos about home health tips, caregiver support, and healthcare resources specific to rural living.*
- *This positions your organization as an authority and a trusted resource.*

5. Cultivate a Positive Reputation

a. Collect and Publicize Testimonials

- *Ask clients or their family members for written or video testimonials that detail their experiences with your services.*
- *Share these testimonials on your website, social media, and in printed promotional materials (with permission).*

b. Demonstrate Community Investment

- *Showcase any charitable activities or sponsorships.*
- *Highlight how you employ local residents, thus contributing to economic development.*

c. Word-of-Mouth and Caregiver Advocacy

- *Encourage Eden's caregivers and staff to talk about our services in the community.*
- *Offer referral incentives for existing clients who recommend new clients.*

6. Provide Education and Resources

a. Create "Aging in Place" Guides

- *Develop simple, easy-to-read guides on home safety and general caregiving tips.*
- *Distribute these guides at local community centers, libraries, and medical offices.*

b. Host Free "Ask a Nurse" or "Ask a Caregiver" Sessions

- *Schedule virtual Q&A sessions or in-person drop-in hours at a community facility.*
- *This allows potential clients or their families to meet staff and learn what services are offered.*

c. Participate in Telehealth Initiatives

- *Rural communities often benefit from telehealth services if in-person care is limited.*
- *Partner with telehealth providers or local hospital networks to offer integrated healthcare solutions.*

7. Maintain Consistent Branding and Messaging

a. Highlight Your Unique Value

- *Emphasize the convenience of in-home care and the specialized expertise of your staff.*
- *Underscore any programs or certifications that set Eden apart (e.g., specialized memory care, post-surgical rehabilitation, or palliative care).*

b. Use Clear, Person-Centered Language

- *Rural communities often rely on trust and personal relationships. Use language that is compassionate and easy to understand.*
- *Focus on how services can improve patients' quality of life and relieve caregiver stress.*

c. Share Stories and Faces

- *Showcase photos of real staff (with permission).*
- *Humanize brand by showing the people behind the company, not just the company logo.*

Conclusions

The summary above highlights how Eden's model differs from those of many other agencies. While the model concept itself is not proprietary, the specific strategy Eden will implement in Benton County is unique to the organization. No single agency can immediately execute activities across all these areas; however, Eden's skilled outreach coordinators carefully select the most effective mix of approaches based on initial research and ongoing feedback. Supported by a robust needs assessment methodology, any home health care provider that engages in these seven key areas will be well-positioned to achieve its utilization and service goals."

Department Evaluation

Eden has been providing home health services within nearby counties for many years and has already established working relationships with providers within Benton County. For this reason, the department concludes that Eden has the experience and expertise to establish the relationships necessary to provide its proposed home health services.

To evaluate this sub-criterion, the department also considers its own analysis and conclusions of this project as related to WACs 246-310-210, 220, and -230. The department concluded this application was compliant with the need criterion under WAC 246-310-210 and the financial feasibility criterion under WAC 246-310-220.

Based on the information above, the department concludes that approval of Eden's project would not result in unwarranted fragmentation of home health services in Benton County. **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.

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This sub-criterion is addressed in sub-section (3) above and **is met**.

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

Based on the source information reviewed and agreement to the conditions identified in the conclusion section of this evaluation, the department determines that Eden's project **meets** the applicable 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 an application has met the criteria of WAC 246-310-210 through -230. If a project fails to meet one or more of these criteria, then the project cannot be considered the best alternative in terms of cost, efficiency, or effectiveness as a result the application would fail this sub-criterion.

If a 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 chapter 246-310 WAC and the 1987 State Health Plan related to the specific project type.

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Step One

For this project, Eden met the applicable review criteria under WAC 246-310-210, -220, and -230. Therefore, the department moves to step two below.

Step Two

Eden considered three options outlined in the following tables. [source: Application pp45-47]

"Alternative 1: *Add Benton County to the Eden Home Health of Spokane Medicare certified agency service area operated with staff residing in Benton County but fully supported as well as directed by the Spokane central home health agency office.*

Alternative 2: *Add Benton County to the Eden Home Health of Spokane Medicare certified agency service area operated with staff residing in Benton County with a branch office in Benton County but fully directed by the Spokane central home health agency office.*

Alternative 3: *Do not add Benton County to the Eden Home Health of Spokane certified agency.*

Patient Access

To ensure seamless home health access for patients, Eden's outreach staff, trained and managed by the Spokane agency office, maintains frequent communication with hospital discharge planning teams in every hospital and nursing home across Benton County. This proactive approach facilitates rapid referrals to home health services. Additionally, outreach staff collaborates with primary care providers and select specialists to reinforce Eden's commitment to promptly registering patients and initiating home health services within two days of eligibility.

As previously shown in Figures 1 and 2, Eden Home Health of Spokane has consistently registered patients more quickly than the two established home health providers, Tri-Cities Home Health and Columbia River Home Health. Meanwhile, Vue's performance remains untested due to a lack of publicly available data.

Regarding patient access, both Alternative 1 and Alternative 2 would enhance access to hospice services by reducing the time between eligibility determination and service initiation. In contrast, Alternative 3 would maintain the existing delays in Benton County, where the time to service remains significantly longer than the statewide average.

Capital Costs

Following discussions with the Department of Licensing staff, Eden has determined that Alternative 1 presents no legal restrictions regarding capital costs, as it does not involve establishing a Branch Office. Even if supplemental space was added in the future, the capital impact would be minimal due to Eden's existing equipment inventory. From a capital cost perspective, Alternative 1 is slightly more favorable than Alternative 2. In either scenario, capital costs would not necessitate an amendment to the application, and both Alternative 1 and Alternative 2 are clearly preferable to Alternative 3, which involves taking no action.

Quality of Care
In a competitive environment, agencies must continuously improve the quality of care to secure referrals and maintain service demand. Given the significant need for additional home health services, long-term differences in quality of care are unlikely. Overall, both Alternative 1 and Alternative 2 are significantly superior to Alternative 3, the "do nothing" approach.

Staffing Impacts
The addition of Eden Home Health of Spokane is expected to enhance staffing efficiency, as the Medicare-certified administrative and central office staff supporting both Eden Hospice of Spokane alternatives will remain the same. With more eligible patients being admitted more quickly in Benton County, overall service volume will increase. For Eden Spokane specifically, patients are also likely to receive care for a longer duration, allowing administrative and support staff hours to be distributed across a larger number of care episodes.

Regarding direct care staff, most agencies follow similar staffing hour standards, which are expected to remain unchanged.

Cost Reduction and Operational Effectiveness
Alternative 1 offers slightly lower costs, as it does not require a Branch or satellite office. From both a cost and operational effectiveness standpoint, both Alternative 1 and Alternative 2 are far superior to Alternative 3, the "do nothing" approach.

Returning to Eden's superior wait time statistics, Eden Home Health of Spokane can help reduce hospital care costs by minimizing the wait time between a patient's hospital discharge and the initiation of home health services—a current issue in Benton County. Ensuring that patients do not experience a decline in their rehabilitation status while waiting for care, whether in a hospital, nursing home, or at home, is crucial for achieving positive health outcomes. In this regard, both Alternative 1 and Alternative 2 are vastly more cost-effective than Alternative 3."

Step Three
This step is applicable only when there are more approvable projects than available need. Since Eden is the only applicant in this review, this step does not apply.

Department Evaluation
Eden provided an analysis of the three options considered prior to submission of its application:

1. Add Benton County to the Eden Home Health of Spokane's Medicare-certified agency service area, operated with staff residing in Benton County but fully supported and directed by Spokane home health agency office,
2. Add Benton County to the Eden Home Health of Spokane's Medicare-certified agency service area with staff residing in Benton County with a branch office also in Benton County; and,
3. Maintain the status quo.

The applicant specifically considered access to health care services, quality of care, cost and operating efficiency, staffing impacts, and legal considerations.

Of the five criteria considered, all five demonstrated advantages for selecting the proposed project. The only disadvantage identified for the proposed project was the time and expense of receiving Certificate of Need approval. Taking no action primarily resulted in disadvantages since this option would not address access to care.

Eden's rejection of alternatives two and three is appropriate. Eden also noted that it must submit a Certificate of Need application to provide Medicare and Medicaid home health services to residents of Benton County; therefore, submission of this application is the appropriate next step. The department did not identify any alternative that was a superior alternative in terms of cost, efficiency, or effectiveness that is available or practical. **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.
(b) The project will not have an unreasonable impact on the costs and charges to the public of providing health services by other persons.

Department Evaluation for Pennant
The proposed project does not involve construction; thus, this sub-criterion does not apply to this project.

(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.

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Eden provided the following statement related to this sub-criterion. [source: Application, p47]
"Eden is exploring innovative outreach strategies to enhance access and awareness for all residents, with a particular focus on reaching low-income communities. The Eden response to Q-18: Provide a discussion explaining how the proposed project will promote continuity in the provision of health care services in the planning area, and not result in an unwarranted fragmentation of services. WAC 246-310-230 shows that Eden has a carefully set strategy to enhance outreach and promote quality insurance and cost effectiveness.

Department Evaluation
Eden provided a reasonable rationale for expanding its Medicare and Medicaid-certified home health services to Benton County residents. If approved, this project has the potential to improve the delivery of necessary in-home services to Benton County residents. **This sub-criterion is met**.