



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
Olympia, Washington 98504

September 9, 2021

Geoff Schackmann, Program Manager
Healthy Living at Home – Seattle, LLC
1499 SE Tech Center Place, Suite 140
Vancouver, WA 98683

Sent via email: gschackmann@healthyliving-vancouver.com

RE: Certificate of Need Application #21-44 – Department's Evaluation

Geoff Schackmann:

We have completed review of the Certificate of Need application submitted HLH Seattle Holdings, LLC. The application proposes to provide Medicare and Medicaid-certified home health services to the residents of King County, within Washington State. 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 HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC agrees to the following in its entirety.

Project Description:

This Certificate of Need approves HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC to establish a Medicare and Medicaid-certified home health agency to serve the residents of the entirety of King County, Washington from its office in Renton. Home Health services provided to King County residents include skilled nursing care, physical, occupational, and speech therapies, medical social work, home health aide, medical director, and nutritional counseling. Services may be provided directly or under contract.

Conditions:

1. Approval of the project description as stated above. HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC further agrees that any change to the project as described in the project description is a new project that requires a new Certificate of Need.
2. HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC shall finance the project using the financing as described in the application.

3. HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC will obtain and maintain Medicare and Medicaid certification.
4. Prior to providing Medicare and Medicaid-certified home health services to King County residents, HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC will provide the Certificate of Need Program with a final patient transfer policy and procedure to ensure that Medicare and Medicaid-certified home health services for persons under the age of 18 years and residing in King County are accessible.
5. Prior to providing Medicare and Medicaid-certified home health services to King County residents, HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC will provide the Certificate of Need Program with an executed and signed business association agreement with at least one home health agency that is approved to provide Medicare and Medicaid-certified home health services to King County residents and are able to serve persons under the age of 18 years.
6. Prior to providing Medicare and Medicaid-certified home health services to King County residents, HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC will provide the Certificate of Need Program with an executed version of its Medical Consultant Agreement. The executed agreement must be consistent with the draft agreement provided in the application.
7. Prior to providing Medicare and Medicaid-certified home health services to King County residents, HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC will provide the Certificate of Need Program with a complete listing of its credentialed staff for review. The listing shall include each staff person's name and professional license number.
8. The service area for this Medicare and Medicaid-certified home health agency is King County. HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC must provide home health services to the entire county for which this Certificate of Need is granted.

Approved Costs:

The approved capital expenditure for the establishment of the King County home health agency is \$9,828, which includes office furniture, movable office equipment, and applicable sales tax.

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

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

Geoff Schackmann, Healthy Living at Home – Seattle, LLC
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Email your response to the Certificate of Need Program at FSLCON@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,

A handwritten signature in black ink, appearing to read "Eric Hernandez", with a stylized flourish extending from the end.

Eric Hernandez, Program Manager
Certificate of Need
Office of Community Health Systems

Attachment

CC: Jonathan Bliss jonbliss@healthylivingnet.com

**EVALUATION DATED SEPTEMBER 9, 2021 FOR CERTIFICATE OF NEED APPLICATIONS
SUBMITTED BY:**

- **WELLSPRING HOME HEALTH CENTER, LLC DBA WELLSPRING HOME HEALTH CENTER, PROPOSING TO EXPAND ITS CURRENT SERVICES TO INCLUDE MEDICARE AND MEDICAID-CERTIFIED HOME HEALTH SERVICES TO RESIDENTS OF KING COUNTY.**
- **HEALTHY LIVING AT HOME – SEATTLE, LLC, PROPOSING TO ESTABLISH A NEW HOME HEALTH AGENCY WHICH PROVIDES MEDICARE AND MEDICAID-CERTIFIED HOME HEALTH SERVICES TO RESIDENTS OF KING COUNTY.**

APPLICANT DESCRIPTIONS

Wellspring Home Health Center, LLC dba Wellspring Home Health Center

Wellspring Home Health Center, LLC (Wellspring) is a limited liability company.¹ Wellspring is currently owned and operated by its members, Dr. Ernest Ibanga and Joyce Ibanga. Wellspring currently operates in-home services agencies in Alaska and was recently² licensed in Washington State.³ Its Washington State operations are located at 8815 South Tacoma Way, Suite 120, Lakewood [98498] within Pierce County, adjacent to King County to the South. [Source: Application, pp 5-6]

Wellspring’s stated fundamental philosophies are “*First, that each person has innate worth, regardless of their health, age, race, color, creed, gender, sexual orientation, or national origin. Second, that each person has entitled to maximize their potential and enjoy a great quality of life. That’s why we treat all our patients like our own family.*” [Source: Wellspring’s website, About]

For this application, Wellspring Home Health Center, LLC dba Wellspring Home Health Center is the applicant and will be referenced in this evaluation as “*Wellspring.*” Additionally, the proposed agency, Wellspring Home Health Center will be referenced in this evaluation as “*WHHC.*”

HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC

Healthy Living at Home – Seattle, LLC is a limited liability company⁴ formed in May of 2019 and a wholly-owned subsidiary of HLH Seattle Holdings, LLC consisting of two members, HLH Capricorn Holdings, LLC and Vistariver Healthcare Solutions, Inc. Healthy Living at Home – Seattle, LLC is a limited liability company that was created specifically for this project. Additionally, Healthy Living at Home – Seattle, LLC, has an affiliate Health Living Network which is a Professional Employer Organization and functions as a central office which assists with non-clinical operational tasks. [Source: Application p5 and Appendices A and C]

Healthy Living Holdings, LLC established its first home health agency in 2008 in San Jose, California. Since its inception in 2008, Healthy Living Holdings, LLC has grown from one agency to several dozen agencies throughout seven states, including, Arizona, California, Idaho, Nevada, Oregon, Utah, and Washington providing a variety of in-home services. [Sources: March 26, 2021, screening response, pdf5 and Healthy Living Network website, About, Our Story]

HLH’s website states “*Our mission is to provide the highest quality of personalized in-home healthcare services with kindness and compassion.*” [Source: Healthy Living Network website, About, Mission & Vision]

¹ Wellspring’s Washington Secretary of State unified business identifier is 604 416 352

² Wellspring’s Washington State Department of Health license first issuance date is 03/26/2020

³ Wellspring’s Washington State Department of Health license number is IHS.FS.61055973

⁴ HLH’s Washington Secretary of State unified business identifier is 604 451 650

For this project, HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC is the applicant; and will be referenced in this evaluation as “*HLH*.” If a Certificate of Need is issued for this project, the department recognizes that the in-home service license could be issued to Healthy Living at Home-Seattle, LLC. Health Living Network an affiliate of the applicant, will be referenced in this evaluation as “*HLN*.”

PROJECT DESCRIPTIONS

Wellspring Home Health Center, LLC dba Wellspring Home Health Center

Wellspring Home Health Center, LLC dba Wellspring Home Health Center is proposing to expand its current services to include Medicare and Medicaid-certified home health services to the residents of King County. This project proposes to operate its Medicare and Medicaid-certified home health agency from its recently licensed agency located at, 8815 South Tacoma Way, Suite 120, Lakewood, Washington [98498] within a county adjacent to the service area, Pierce County. [Source: Application, p8]

Services to be provided to King County residents include the full range of care defined by the Medicare home health conditions of participation. Including: skilled nursing care, physical, occupational, and speech therapies, medical social work, home health aide, medical director, respite, and IV therapy services. [Source: Application, p8]

With the expectation of a Certificate of Need review takes about seven months, if approved, Wellspring would begin providing Medicare and Medicaid-certified home health services for King County residents within approximately four months of Certificate of Need review being completed.⁵ [Source: Application, p10] For this project, full calendar year one is 2022 and year three is 2024.

The estimated capital expenditure for the project is \$25,000. Since this project proposes to set up an office in an existing facility the costs are for tenant improvements, office furniture, movable office equipment, and applicable sales tax. There are no construction costs associated with this project. [Source: Application, p9]

HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC

HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC is proposing to establish a new Medicare and Medicaid-certified home health agency to serve the residents of King County. This project proposes to operate its Medicare and Medicaid-certified home health agency from offices located at, 707 South Grady Way, Suite 600, Renton, Washington [98057] within King County. [Source: May 28, 2021, screening response, p3 and p5]

Services to be provided to King County residents include the full range of care defined by the Medicare home health conditions of participation. Including: skilled nursing care, physical, occupational, and speech therapies, medical social work, home health aide, medical director, and nutritional counseling. [Source: Application, p9]

With the expectation that Certificate of Need review would be completed in December 2021, if approved, HLH would begin providing Medicare and Medicaid-certified home health services for King County

⁵ November 1, 2021 is the completion date specified by the applicant, however, when making this estimate the applicant was not able to foresee concurrent review delays and incorporate this timing.

residents in January 2022. [Source: Application, p9] For this project, full calendar year one is 2022 and year three is 2024.

The estimated capital expenditure for the project is \$9,828. Since this project proposes to set up an office in an existing facility the costs are for office furniture, movable office equipment, and applicable sales tax. There are no construction costs associated with this project. [Source: March 26, 2021, screening response, pdf13]

APPLICABILITY OF CERTIFICATE OF NEED LAW

These applications are 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 WAC 246-310 does not contain service or facility standards in sufficient detail to make the required determinations, WAC 246-310-200(2)(b) identifies the types of standards the department may consider in making its required determinations.

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

Two applications were received proposing to provide Medicare and Medicaid-certified home health services to the residents of King County. One was received on December 17, 2020 submitted by Wellspring. The second was received on January 21, 2021 submitted by HLH. Since both applicants proposed projects to serve the residents of King County, they were reviewed concurrently under the regular timeline outlined in WAC 246-310-160.

APPLICATION CHRONOLOGY

Action	WHH	HLH
Letter of Intent Received	July 21, 2020	December 8, 2020
Application Received	December 17, 2020	January 21, 2021
Department's pre-review activities <ul style="list-style-type: none">• DOH 1st Screening Letter Sent• Supplemental Screening Letter Sent• Applicant's Responses Received	January 11, 2021 February 11, 2021 March 26, 2021	February 11, 2021 Not Applicable March 26, 2021
<ul style="list-style-type: none">• DOH 2nd Screening Letter Sent• Applicant's Responses Received	April 16, 2021 May 19, 2021	April 16, 2021 May 28, 2021
Beginning of Review	June 7, 2021	
Public Hearing	None requested or conducted	
Public Comments Deadline	July 12, 2021	
Rebuttal Comments Deadline	July 26, 2021	
Department's Anticipated Decision Date	September 9, 2021	
Department's Actual Decision Date	September 9, 2021	

AFFECTED PERSONS

“Affected persons” are defined under WAC 246-310-010(2). In order to qualify as an affected person, someone must first qualify as an *“interested person,”* defined under WAC 246-310-010(34). Under concurrent review, each applicant is an affected person for the other's application. Although comment was provided by multiple organizations and individuals, no other entities sought affected person status. Only the applicants are considered affected persons.

SOURCE INFORMATION REVIEWED

- Wellspring's Certificate of Need application received December 17, 2020
- Wellspring's first screening response received March 26, 2021
- Wellspring's second screening response received May 19, 2021
- HLH's Certificate of Need application received January 21, 2021
- HLH's first screening response received March 26, 2021
- HLH's second screening response received May 28, 2021
- 1987 Washington State Health Plan
- Office of Financial Management Population Data 2017
- 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
- Wellspring's website: <https://www.wellspringhomehealth.com/about/>
- HLN's website: <https://healthylivingnet.com/>
- CMS QCOR Compliance website: https://qcor.cms.gov/index_new.jsp
- Washington Secretary of State corporation data

CONCLUSIONS

Wellspring Home Health Center, LLC dba Wellspring Home Health Center

For the reasons stated in this evaluation, the application submitted by Wellspring Home Health Center, LLC dba Wellspring Home Health Center is proposing to expand its current services to include Medicare and Medicaid-certified home health services to the residents of King County, is consistent with applicable criteria of the Certificate of Need Program, provided Wellspring agrees to the following in its entirety.

Project Description:

This Certificate of Need approves Wellspring Home Health Center, LLC dba Wellspring Home Health Center to expand its current services to include Medicare and Medicaid-certified home health services to the residents of the entirety of King County, Washington from its office in Lakewood. Home Health services provided to King County residents include skilled nursing care, physical, occupational, and speech therapies, medical social work, home health aide, medical director, respite, and IV therapy services. Services may be provided directly or under contract.

Conditions:

1. Approval of the project description as stated above Wellspring Home Health Center, LLC dba Wellspring Home Health Center further agrees that any change to the project as described in the project description is a new project that requires a new Certificate of Need.
2. Wellspring Home Health Center, LLC dba Wellspring Home Health Center shall finance the project using the financing as described in the application.
3. Wellspring Home Health Center, LLC dba Wellspring Home Health Center will obtain and maintain Medicare and Medicaid certification.
4. Prior to providing Medicare and Medicaid-certified home health services to King County residents, Wellspring Home Health Center, LLC dba Wellspring Home Health Center will provide the Certificate of Need Program with a complete listing of its credentialed staff for review. The listing shall include each staff person's name and professional license number.
5. The service area for this Medicare and Medicaid-certified home health agency is King County. Wellspring Home Health Center, LLC dba Wellspring Home Health Center must provide home health services to the entire county for which this Certificate of Need is granted.

Approved Costs:

The approved capital expenditure for the home health agency's expansion to King County is \$25,000, which includes tenant improvements, office furniture, movable office equipment, and applicable sales tax.

HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC

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

Project Description:

This Certificate of Need approves HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC to establish a Medicare and Medicaid-certified home health agency to serve the residents of the entirety of King County, Washington from its office in Renton. Home Health services provided to King County residents include skilled nursing care, physical, occupational, and speech therapies, medical social work, home health aide, medical director, and nutritional counseling. Services may be provided directly or under contract.

Conditions:

1. Approval of the project description as stated above. HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC further agrees that any change to the project as described in the project description is a new project that requires a new Certificate of Need.
2. HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC shall finance the project using the financing as described in the application.
3. HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC will obtain and maintain Medicare and Medicaid certification.
4. Prior to providing Medicare and Medicaid-certified home health services to King County residents, HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC will provide the Certificate of Need Program with a final patient transfer policy and procedure to ensure that Medicare and Medicaid-certified home health services for persons under the age of 18 years and residing in King County are accessible.
5. Prior to providing Medicare and Medicaid-certified home health services to King County residents, HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC will provide the Certificate of Need Program with an executed and signed business association agreement with at least one home health agency that is approved to provide Medicare and Medicaid-certified home health services to King County residents and are able to serve persons under the age of 18 years.
6. Prior to providing Medicare and Medicaid-certified home health services to King County residents, HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC will provide the Certificate of Need Program with an executed version of its Medical Consultant Agreement. The executed agreement must be consistent with the draft agreement provided in the application.
7. Prior to providing Medicare and Medicaid-certified home health services to King County residents, HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC will provide the Certificate of Need Program with a complete listing of its credentialed staff for review. The listing shall include each staff person's name and professional license number.
8. The service area for this Medicare and Medicaid-certified home health agency is King County. HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC must provide home health services to the entire county for which this Certificate of Need is granted.

Approved Costs:

The approved capital expenditure for the establishment of the King County home health agency is \$9,828, which includes office furniture, movable office equipment, and applicable sales tax.

CRITERIA DETERMINATIONS

A. Need (WAC 246-310-210)

Wellspring Home Health Center, LLC dba Wellspring Home Health Center

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

HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC

Based on the source information reviewed and agreement to the conditions identified in the conclusion section of this evaluation, the department determines that the Healthy Living at Home – Seattle, LLC 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.*

WAC 246-310-210(1) 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. [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 cohorts' projected number of home health patients (calculated in the previous step) by its 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 to a planning area from the projected number of agencies needed. This results in the net number of agencies needed for the planning area.

Wellspring Home Health Center, LLC dba Wellspring Home Health Center

Wellspring provided a numeric methodology based on the five steps identified in the SHP. The applicant’s methodology is summarized in the following table. [Source: Application, pp13-14]

Department’s Table 1
Wellspring’s Numeric Need Methodology for Year 2023

Estimated home health agency gross need	58.08
Subtract # of home health agencies in the supply	(32)
Net need for Medicare and Medicaid home health agencies	26.08
Total net need	26

As shown in the table, Wellspring estimates a net need for 26 home health agencies by the end of year 2023.

Public Comment

None

Rebuttal Comment

None

Department Evaluation

The department’s evaluation of both applicants’ numeric methodology is presented following the discussion of HLH’s project.

HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC

HLH provided a numeric methodology based on the five steps identified in the SHP. The applicant’s methodology is summarized in the following table. [Source: Application, pp15-17]

Department’s Table 2
HLH’s Numeric Need Methodology for Year 2023

Estimated home health agency gross need	58.33
Subtract # of home health agencies in the supply	(32)
Net need for Medicare and Medicaid home health agencies	26.33
Total net need	26

As shown in the table, HLH estimates a net need for 26 home health agencies by the end of year 2023.

Public Comment

None

Rebuttal Comment

None

Department Evaluation of Numeric Need for the King County Home Health Projects

The SHP methodology is a five-step process that projects the number of home health visits in a planning area. This section outlines these steps and applies them to King County. [Source: SHP, pB-35]

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

Department's Table 3
Numeric Need Methodology for King County
Step One – Project Planning Area Population by Age Cohort

Age Cohort	2022	2023	2024
0-64	1,930,192	1,941,913	1,953,635
65-79	273,267	282,808	292,350
80+	77,614	81,184	84,753

[Source: OFM “Projections of the Population by Age and Sex for Growth Management, 2017 GMA Projections - Medium Series”]

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.

Department's Table 4
Numeric Need Methodology for King County
Step Two – Projected Number of Home Health Patients

Age Cohort	Use Rate	2022	2023	2024
0-64	0.005	9,650.96	9,709.57	9,768.17
65-79	0.044	12,023.74	12,443.56	12,863.38
80+	0.183	14,203.44	14,856.60	15,509.76

Step three: Project number of patient visits

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

Department's Table 5
Numeric Need Methodology for King County
Step Three – Projected Number of Home Health Visits

Age Cohort	Use Rate	Visits	2022	2023	2024
0-64	0.005	10	96,510	97,096	97,682
65-79	0.044	14	168,332	174,210	180,087
80+	0.183	21	298,272	311,989	325,705
Totals			563,114	583,294	603,474

Step four: Determine the projected home health agencies needed

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.

Department’s Table 6
Numeric Need Methodology for King County
Step Four – Projected Number of Home Health Agencies Needed

Age Cohort	Use Rate	Visits	2022	2023	2024
0-64	0.005	10	96,510	97,096	97,682
65-79	0.044	14	168,332	174,210	180,087
80+	0.183	21	298,272	311,989	325,705
Totals			563,114	583,294	603,474
Target Minimum Operating Volume			10,000	10,000	10,000
Number of Agencies			56.31	58.33	60.35
Number of Agencies Needed			56	58	60

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 to a planning area from the projected number of agencies needed. This results in the net number of agencies needed for the planning area. Following is a brief description of how the department determines what agencies should be included or excluded from the numeric need methodology’s supply.

Important to note is 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 factors 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.⁶ At initial licensure, renewal, or through separate request, agencies are able to list or edit its service areas, number of home health employees, and services provided. Each of these are used to help determine if an agency is available and accessible to the entirety of King County residents.

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

Another factor used includes an agencies’ response to the department’s home health utilization survey. In 2019 and 2020, the department sent utilization surveys to all home health agencies that

⁶ Integrated Licensing and Regulatory System (ILRS).

were licensed. The survey requested historical admissions and visits for the preceding years, 2018 and 2019 respectively.

An additional factor used in this assessment is each agencies' public website. First, is there a site that is verifiably linked to the licensee. Second, are services listed in line with the SHP discussed earlier. Then, is King County an area that the agency lists as available to serve.

The attached analysis in Appendix A lists which agencies are sufficiently available and accessible was used in order to determine which agencies were counted in the King County home health supply.

The department started with a listing of licensed in-home services agencies, which had 1,118 licenses. Next, the department eliminated any licenses that had a status of closed, denied licensure, expired, revoked, or suspended. This left 527 in-home services licenses with a status of active or pending.

Then, agencies that did not list on their state license, home health as an agency service category or that was not serving King County, were excluded. Next, applied is the SHP definition of home health agency. Based on these factors 78 home health agencies remained.

The department's findings on these 78 agencies are detailed as Appendix A attached to this evaluation, including the rationale outlining each agencies' inclusion or exclusion from the supply for the numeric methodology for King County. A summary is in the following table.

Department's Table 7
Summary of Determining the Existing Supply for King County

Applicants	Two agencies are excluded on this basis.
Medicare and Medicaid-certified agencies	18 agencies are <i>counted</i> .
Website research shows services are limited to a special population or to only parts of King County	11 agencies are excluded on this basis, which includes one Medicare and Medicaid-certified agency, counted above.
Website research shows services exclude the agency from the SHP definition of a home health agency	15 agencies are excluded on this basis.
No recent surveys were submitted, and no website located	Six agencies are excluded on this basis.
No recent surveys were submitted, website research did not specify service area limitations/inclusions, and low FTE to service area ratio	Two agencies are excluded on this basis.
No recent surveys were submitted or no King County admits in submitted survey, and low FTE to service area ratio	Ten agencies are excluded on this basis.
Agency which submitted a survey, no website was located, and low FTE to service area ratio	One agency excluded since its recent survey had few (two) King County admits,

Exclusion of the 47 agencies listed in Appendix A results in 31 remaining agencies. The following table shows the remaining 31 licenses, all of which represent the existing supply of home health agencies serving the residents of King County.

Department's Table 8
The Existing Supply for King County

Agency Name	WA DOH License Number
AdvisaCare	IHS.FS.00000156
Amedisys Home Health	IHS.FS.61035006
American Healthcare Services	IHS.FS.00000214
Amicable Health Care	IHS.FS.00000215
A-One Home Care	IHS.FS.00000219
Assured Home Health	IHS.FS.60497952
Avail Home Health	IHS.FS.00000231
Brookdale Home Health	IHS.FS.61186662
Careage Home Health	IHS.FS.60007888
CHI Franciscan Health at Home	IHS.FS.60506466
Eden Home Health	IHS.FS.60871865
Encore Home Health	IHS.FS.60922864
Envision Home Health	IHS.FS.60521160
Evergreen Health	IHS.FS.00000278
Family Resource Home Care	IHS.FS.60857773
Fedelta Care Solutions	IHS.FS.61028960
Haven Home Health Care	IHS.FS.61108148
ICHHS PACE at Legacy House	IHS.FS.60904213
Kindred at Home	IHS.FS.00000295
Kindred at Home	IHS.FS.00000293
Kline Galland Community Based Services	IHS.FS.60103742
MultiCare Home Health, Hospice and Palliative Care	IHS.FS.60081744
Providence Elder Place	IHS.FS.00000415
Providence Home Services	IHS.FS.00000419
Puget Sound Home Health of King County	IHS.FS.60751653
Right At Home	IHS.FS.00000096
Sea Mar Home Health	IHS.FS.00000433
Signature Healthcare at Home	IHS.FS.00000220
Signature Healthcare at Home	IHS.FS.00000382
Wellspring Home Health, LLC	IHS.FS.61055973
Wesley Health and Homecare	IHS.FS.60276500

The next table includes a row with the number of existing agencies (31) that are counted in the supply.

Department's Table 9
Numeric Need Methodology for King County
Step Five – Subtract the Existing Supply

Age Cohort	Use Rate	Visits	2022	2023	2024
0-64	0.005	10	96,510	97,096	97,682
65-79	0.044	14	168,332	174,210	180,087
80+	0.183	21	298,272	311,989	325,705
Totals			563,114	583,294	603,474
Target Minimum Operating Volume			10,000	10,000	10,000
Number of Agencies			56.31	58.33	60.35
Number of Gross Agencies Needed			56	58	60
Number of Existing Agencies			31	31	31
Net Agencies Needed			25	27	29

Both applicants under review anticipate their first full year of services to be year 2022. Taking this timeline into consideration, time spent for this review, and the completed utilization data, the department's methodology base year is 2022; projected year is 2024.

The following table is a summary of the factors used in the department's numeric home health methodology for King County.

Department's Table 10
Department's Numeric Methodology Assumptions and Data

Assumption	Data Used
Planning Area	King County
Population Estimates and Forecasts	Age Group: 0 – 85+ OFM Population Data released year 2017, medium series: Projected Year 2024 – 2,330,737
Utilization by Age Cohort	Age 0-64 = 0.005 Age 65 – 79 = 0.044 Age 80+ = 0.183
Number of Visits by Age Cohort	Age 0-64 = 10 visits Age 65 – 79 = 14 visits Age 80+ = 21 visits
Existing Number of Providers	31 providers based on the attached analysis

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 11
Summary of Department of Health
King County Home Health Need Projection

	2022	2023	2024
Total Number of Patient Visits	563,114	583,294	603,474
Divided by 10,000	56.31	58.33	60.35
Rounded Down	56	58	60
Existing Number of Agencies	31	31	31
Net Need	25	27	29

As shown in the preceding table, need for an additional 29 home health providers is projected in projection year 2024. Based solely on the numeric methodology, need for additional home health agencies 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.

Wellspring Home Health Center, LLC dba Wellspring Home Health Center

Wellspring provided the following statements related to this sub-criterion. [Source: Application, pp17-18]

“Please see Exhibit 6 for a list of the existing supply of home health agencies located in King County or provide hospice services to King County residents. The Department’s need methodology (see Table 5 above and Exhibit 6), after accounting for all relevant supply of home health agencies, estimates current (CY2020) net need for twenty (20) additional agencies, growing to twenty-six (26) additional agencies by CY2023. Therefore, there is tremendous need for additional home health services in King County beyond the capacity of the existing providers.

As demonstrated above, there exists significant unmet need for additional home health agencies in King 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 King County residents to outmigrate to other areas.

Since there exists a significant unmet need for additional home health agencies in King County, Wellspring’s proposed project is by definition not an unnecessary duplication of services.”

In response to a question asking about overcoming barriers to provision of services Wellspring provided the following statement. [Source: March 26, 2021, screening response, pp2-4]

“Most home health patients are Medicare-sponsored patients, and without Certificate of Need approval, Wellspring is unable to provide services to these individuals, or individuals sponsored by Medicaid. However, there do exist patients who belong to private insurance plans, as well as a small number of uninsured individuals who require home health services. As such, in principle, it is possible for Wellspring to serve non-Medicare patients as a state-only licensed agency, but Wellspring has suffered due to some unfortunate timing.

Wellspring Home Health opened in November 2019 and planned to start serving patients in March 2020. It began hiring staff in February 2020 and was working on receiving contracts with residents and area healthcare providers. However, it was at this moment that COVID-19 dramatically affected Pierce and King County healthcare providers, challenging efforts to obtain any referrals. Wellspring has a tradition of serving a certain number of patients Pro Bono, and in March 2020, contacted local healthcare providers for patients in need of home health services otherwise unable to obtain them. Wellspring received a handful of referrals in March and April of 2020, however the referred patients chose to cease services due to COVID-19 related concerns. The number of unique patients and visits are included in the table below.

Table 1: Wellspring Lakewood Pro Bono Patients, CY2020	
	Lakewood (CY2020)
Total Home Health Visits	20 total visits
Unduplicated home health patients	9 unique patients
Skilled Nursing	14 visits
Physical Therapy	0
Occupational Therapy	2 visits
Speech Pathology	0
Medical Social Services	0
Home Health Aide	4 visits

Without the prospect of any patients over 2020, it was necessary for Wellspring to wait out the pandemic-related factors that led to patients and provider reticence to schedule home health services. Currently, as attitudes towards in-home services have shifted and vaccinations for the 65+ population continue, Wellspring does not anticipate the barriers it faced in 2020 and early 2021 to continue.”

Wellspring also provided the following statements on potential negative impacts and consequences of unmet home health needs. [Source: Application, p14]

“There is significant unmet need for home health services currently in the King County. This unmet need is only expected to grow further with population growth and population aging. If there is not sufficient capacity in the planning area, then King County residents will not have timely access to home health services, which will result in poorer quality, lower outcomes, and a reduced patient experience as patients may delay or forgo receiving the necessary skilled services. Further, without sufficient access to home health agencies, this can also lead to increased costs due to preventable emergency room visits or hospitalizations and patients having to receive care at more expensive alternatives.”

Wellspring provided the additional information about specialized home health services it plans to offer to specific populations. [Source: March 26, 2021, screening response, pp4-5]

“Wellspring Home Health Center will serve all residents in King County in need of home health services. Wellspring Home Health offers a wide variety of home medical and support care services to meet the unique needs of each individual patient. As indicated above, Wellspring Home Health will directly provide skilled nursing physical therapy, occupational therapy, speech therapy, medical social work, home health aide, and respite care services while contracting medical director and IV therapy services. All Wellspring Home Health’s programs are coordinated by highly trained,

experienced, and licensed nurses whose focus is providing the most appropriate, professional, and compassionate care for our patients in an in-home setting.

We also plan to offer the following specialty home health services for the pediatric and veteran populations:

Pediatric Home Health Services

Wellspring Home Health Center provides an effective and holistic treatment of children with medical complexity or developmental disabilities who otherwise may experience frequent and/or prolonged hospitalizations or who may enter chronic institutional care. Each child benefits from a readily accessible and comprehensive written plan of care that represents a consensus among the family, the patient, and the caregivers. Our Pediatric specialty providers interact with the child, family, and home health providers, using home visits and telehealth technologies to optimize care, minimize family disruptions, and avoid unnecessary medical utilization.

Veterans Home Health Services

Wellspring Home Health Center helps veterans or their surviving spouses receive personal care services to help them retain their quality of life and stay in their homes. We assist veterans who protected our freedom to stay in their homes and live with honor and dignity. Home care is delivered by our home health Agency through contract with VA. The program is for Veterans who need skilled services such as skilled nursing, case management, physical therapy, occupational therapy, speech therapy, wound care, or IV antibiotics. Skilled Home Health Care is used in combination with other home-based services.”

Public Comment

The following entities provided comments related to this sub-criterion. Presented here are excerpts specific to this review sub-criterion.

Dr. Janice Kalip, President, Mothers Bread Charity Organization

“As the President of Mothers Bread, a charity organization dedicate to providing financial support and counseling to minority women in Tacoma. I have had the pleasure of working with the President of Wellspring Home Health Center on numerous occasions to serve our minority and military community.

...

There exists current need for additional Home Health Agencies in King County. I strongly believe that Wellspring would be a welcome addition and answer to prayers to alleviate these overwhelming needs. I urge you to approve Wellspring Home Health Center, LLC Certificate of Need Application to Establish a Medicare certified and Medicaid eligible Home Health Agency to serve King County.”

John Colvin, Treasurer, Thurston County Veteran Services

“I am writing on behalf of the Thurston County Veteran Services asking for your approval of Wellspring Home Health Center, LLC application to provide Medicare and Medicaid Home Health services to King County. As a community leader, it is vital to me to have expanded access to Home Health Care services for King County residents. There exists current need for additional Home Health Agency in King County due to an increasing segment of our community that is aging.”

Miguel D. Padilla, President, In Touch “We Care” Support Group

“As the President of In Touch ‘We Care’ Support Group, we are a 501C3 Nonprofit Organization which partners with organizations in the community with programs that supports Homeless Veterans, Surviving Spouses & their children, and the Alex Calliste Scholarship Fund.

As a community leader dedicated to serving the need of our military Veterans, I am writing today to advocate for the approval of Wellspring Home Health Center, LLC application to provide Home Health services in King County because our Veterans population is growing and aging and the need for Home Health Services has increased exponentially.”

Isabella Colvin, President, Association of the United States Army

“As the president of the Association of the United States Army (AUSA) Captain Meriwether Lewis Chapter, a nonprofit educational and professional development association serving America’s Army and supporters of a strong national defense. AUSA also provides a voice for the Army, supports the Soldier, and honors those who have served in order to advance the security of the nation.

I am writing today to advocate for the approval of Wellspring Home Health Center, LLC application to provide Home Health Care services in the King County region because our Veterans population is growing and aging and the need for Home Health Services has increased.”

Rebuttal Comment

None

Department Evaluation

Wellspring is proposing to serve King County residents from its adjacent Pierce County agency located in Lakewood. Wellspring states that the significant numeric need itself evidences that existing services and agencies are not sufficiently available to meet the calculated need. If its application is approved, Wellspring would be required to be available to all residents of King County.

Typically, the department reviews the number of home health visits by agencies counted in the supply against the projected number of visits to further assess availability and accessibility. Historical visit information is only available to the department through its use of annual surveys. Since there was a very limited number of completed surveys returned in recent years, even by CN-approved agencies, the department did not conduct this analysis for these projects. Rather, the department takes into consideration the public comments received which support the addition of a new provider to King County.

The department concludes that the numeric methodology supports need for additional home health agencies to serve the residents of King County. Wellspring provided a reasonable rationale for its project, including negative impacts of unmet home health needs and specialized services meant to reach unique portions of the population that are in need of services. Based on the information received, the department concludes that Wellspring demonstrated need for its proposed project and **meets this sub-criterion.**

HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC

HLH provided the following statements related to this sub-criterion.

“The applicant and this application is not considered an unnecessary duplication of services for King County as evidenced by the need for 26 additional agencies by the year 2023.” [Source: Application, p22]

“In order to meet the increased visit demand in the planning area, an additional 26 agencies are needed by the year 2023 (based on WA Department Analysis). This demand cannot be met by the current list of approved agencies so any agencies added to the service area will not be a duplication of service nor will it impact existing agency market shares; it will only allow more patients to be seen. Furthermore, as the COVID pandemic has shown, there is a greater desire from patients to receive care outside of institutional settings. This will move visit projections higher than we have seen historically and will also push more staff out of institutional settings into home care thus preventing a significant impact to existing home health agency staffing. Finally, the Healthy Living Network has a rather robust recruiting and placement process to drive clinicians into markets where they are most needed without impacting the markets where they currently reside.” [Source: March 26, 2021, screening response, pdf7]

In response to a question asking about overcoming barriers to provision of services HLH provided the following statement. [Source: Application, p21]

“Availability of clinical staff is identified as one of the main factors in the planning area that could restrict patient access to home health services.

According to Healthy Living Network Resources, there is high competition in King County with many RN home health job openings and only 4.4 job seekers per opening.

The Applicant will mitigate these factors with the following:

- 1) Has an established agreement with Healthy Living Network Resources who has a dedicated recruitment team. They will leverage the many resources available to them to promote and advertise job listings, screen and hire candidates.*
- 2) Healthy Living Network Resources currently has clinicians interested in transferring to the Seattle market when opened.*
- 3) The Applicant has a competitive benefit package designed to attract and retain clinical staff.”*

Public Comments

None

Rebuttal

None

Department Evaluation

HLH is proposing its agency would serve King County residents from offices located in Renton, within King County. HLH states that the significant numeric need itself evidences that existing services and agencies are not sufficiently available to meet the calculated need. If its application is approved, HLH would be required to be available to all residents of King County.

As stated earlier, the department did not review the number of home health visits by agencies counted in the supply against the projected number of visits to further assess availability and accessibility. Instead, the department may take into consideration the public comments received which support the addition of a new provider to King County. For this project, there were no public comments provided in support of this project. It is noted that none of the existing home health agencies provided comments asserting that the addition of new home health agency should be considered a duplication of services for King County. Further, HLH acknowledged a potential barrier for all providers is

recruitment of necessary staff to provide the services. HLH provided a viable option for ensuring staff is available for the new services.

The department concludes that the numeric methodology supports need for additional home health agencies to serve the residents of King County. HLH provided a reasonable rationale for its project, including its proven strategies to overcome planning area barriers. Based on the information received, the department concludes that HLH 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 that cannot afford to pay for services.

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

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

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

Charity care shows a willingness of a provider to provide services to individuals who do not have private insurance, do not qualify for Medicare, do not qualify for Medicaid, or are under insured. With the passage of the Affordable Care Act, the amount of charity care is expected to decrease, but not disappear.

Wellspring Home Health Center, LLC dba Wellspring Home Health Center

Wellspring provided copies of the following policies. [Source: March 26, 2021, screening response, Exhibits 7A-revised, 7B-revised, 7C, 8A-revised, 8B, 8C, 9-revised]

- Admission Criteria Policy
- Patient Referral Policy
- Case Management and Assignment Policy
- Financial Assistance Policy
- Bill of Rights/Responsibilities
- Patient Grievance Policy
- Policy on Abuse, Neglect and Exploitation

Wellspring also provided the following statements related to this sub-criterion.

“Wellspring Home Health will seek Medicare and Medicaid certification and will not discriminate due to a patient’s financial status and will not discriminate on the basis of age, sexual orientation, gender, mental/physical handicap, race, religion, ancestry or national origin. Our financial assistance policy is included in Exhibit 9.” [Source: Application, p18]

To provide additional clarification on its policies, Wellspring submitted the following statements. [Source: March 26, 2021, screening response, p12]

“Wellspring is committed to take care of the community irrespective of a patient’s financial status. This policy is rooted in our core value and principle of servant leadership and compassionate care. This is one of the reasons why Wellspring’s President, Ernest Ibanga, spent 23 years in the military, including three (3) tours of duty, - to, as he states, ‘give back to America, our adopted country who has been so welcoming and loving to us.’ In Wellspring’s Alaska operations, it has provided free medicine, clothing, meals, home cleaning, and other services to patients in need. Wellspring would continue its commitment to serving the needs of the community in Washington.

Versions of these policies are in place at Wellspring’s Alaska facilities, and are consistent with the rules and regulations in place there. The policies submitted as part of our application and screening responses for the proposed project reflect revisions of these Alaska policies such that they are consistent with the Washington State rules and regulations.”

As related to assumed payer mix and its associated assumptions, Wellspring provided the following statements.

“Please see Table 2 below for an amended version of Application Table 9 that includes the projected payer mix by both percentage of patients and percentage of gross revenue by payer source. Note that the percentage of gross revenue and patient assumed in the financial model and identified in the table below are the same, as patients will have similar charges (i.e. gross revenues) regardless of payer source.

Because there have been no patients treated at our Washington location (except the few patients treated pro-bono as referenced in screening response #4 above) and recognizing that the Alaska operations are not representative of what would be expected for Washington, the projections are based on Washington benchmarks based on public documents for other home health projects similar to Wellspring’s proposed project. See our response to question #7 below for verifiable reference to these benchmarks.

The projected percentages of patients are not expected to change for the first three years of operation.” [Source: March 26, 2021, screening response, p6]

“In determining appropriate assumptions for our financial Pro Forma, we applied an average of financial assumptions from three previously approved Washington home health applications. These included the approvals of Amicable Healthcare, Inc (CN #19-52) in King County, Providence Home Health (CN #20-24) in Clark County, and Eden Home Health (CN #19-67) in Spokane County.

Financial assumptions for payer mix and, reimbursement, expenses, and other assumptions, and the statistics upon which they are based, vary significantly from applicant to applicant, even within a given county. For example, the payer mixes from approved King County applications or applicants with King County histories, which we present in Table 1, vary substantially by applicant.

Table 1: Payer Mix by King County Approved Home Health Applicant					
Applicant Name	Wellspring	Amicable	Eden	Envision	Careage
County of Proposed Project	King	King	King	Pierce	Pierce
County of Presented Payer Mix	King	King	King	King	King
CN Number	21-35	19-52	18-02	18-03	17-08
Approval Date	Current Applicant	9/6/2019	5/11/2018	12/22/2017	12/22/2017
Historical/Projected	Projected	Projected	Projected	Historical	Historical
Medicare	77%	73%	75.0%	93%	65.8%
Medicaid	6%	5%	6.0%	2%	7.2%
Commercial/Other	17%	22%	19.0%	5%	27.0%
Total	100%	100%	100%	100%	100%
Sources: CN#19-52 Eval p. 17; CN #18-02 Eval p. 22; CN #18-03 p. 19; CN #17-08 p. 43					

Furthermore, county demographics are not static over time, and shift with fertility, mortality, and migration. Over the period 2014 to 2018, King County had on average about 2,138,336 persons aged one and older. Estimates from the American Community Survey indicate that between 2014 and 2018, on average about 121,735 individuals moved to King County from other areas in the United States, while about 122,589 King County residents moved to other areas. This indicates that, every year, about 5 to 6 percent of the King County population leaves and is replaced by persons from other areas. Most of this in- and outmigration occurs within Washington State with about a third of in-migrants (41,083) and half of out-migrants (57,298) either arriving from or leaving to other Washington counties.

For the above reasons, including the facts that payer and other financial statistics vary substantially from applicant to applicant, and that the King County demographics underlying these financial statistics shift over time and are affected by the current and past demographics of other Washington areas, we decided it was most reasonable to apply financial assumptions which reflected an average across multiple applicants whose projects were approved in representative counties across Washington State. King County, Clark County, and Spokane County all reflect relatively urban and population dense counties, and all rank within the top five populous counties in Washington State. Furthermore, it is reasonable to expect the current demographics of Clark and Spokane county to affect the future demographics of King County, given that, on average, these counties each send about 1,700 persons per year to King County in the form of in-migrants.” [Source: May 19, 2021, screening response, pp2-3]

Wellspring also provided the following payer mix associated with this project. [Sources: Application, p23 and March 26, 2021, screening response, p6]

**Department's Table 12
Wellspring's Projected Payer Mix**

Revenue Source	Percent of Gross Revenue	Percent of Net Revenue	Percent of Patients
Medicare	77%	84.1%	77%
Medicaid	6%	3.3%	6%
Commercial/Other	17%	12.6%	17%
Total	100%	100%	100%

Public Comment

The following entities provided comments related to this sub-criterion. Following are excerpts specific to this review sub-criterion.

Ernest Ibanga, President, Wellspring Home Health Center, LLC

“1. Letters of support for Wellspring.

Wellspring is committing to taking care of the community irrespective of a patient's race, color, creed, gender, sexual orientation, national origin, or financial status. This approach is rooted in our core value and principle of servant leadership and compassionate care and highlights the ability of the proposed project to meet the needs of underserved communities, including the poor and uninsured, a small but traditionally underserved population of home health users.

Wellspring is also well equipped to provide needed home health services to the veteran community in King County. Wellspring's President, Ernest Ibanga, served 23 years in the military and has developed Wellspring to help veterans and surviving spouses by providing home health services designed to help retain their quality of life and stay in their home. Wellspring's goal is to help all veterans live with honor and dignity. Please see attached Exhibit 1 letters of support for Wellspring with an emphasis on its ability to serve the veteran community in King County.”

Dr. Janice Kalip, President, Mothers Bread Charity Organization

“As the President of Mothers Bread, a charity organization dedicate to providing financial support and counseling to minority women in Tacoma. I have had the pleasure of working with the President of Wellspring Home Health Center on numerous occasions to serve our minority and military community. Wellspring Home Health Center has earned the highest reputation demonstrating their commitment to serving Veterans and Military Retirees and their families in the communities they serve. Home Health service is a very intimate form of healthcare provided in private and retirement homes and at life's weakest and most vulnerable moments. The President of Wellspring Home Health Center, having served in the U.S. Army as a commissioned officer on Active-Duty for 23 years and was awarded the Bronze Star Medal for Combat and four (4) Meritorious Service Medals for superb service, and has received numerous outstanding ribbons, awards, and accolades for protecting our freedom and liberty, has trained all Wellspring staff and leaders to become sensitive and competent in discerning and serving the unique needs of Veterans.

There exist a high number of Veterans in King County. Wellspring Home Health Center has a specialized Veterans Home Health services program that helps Veterans and surviving spouses by providing both skilled and unskilled personal Home Health services designed to help them retain their quality of life and stay in their home. One of their primary goals is to help all Veterans who bravely protect our freedom and way of life, live with honor and dignity.”

John Colvin, Treasurer, Thurston County Veteran Services

"I am writing on behalf of the Thurston County Veteran Services asking for your approval of Wellspring Home Health Center, LLC application to provide Medicare and Medicaid Home Health services to King County. As a community leader, it is vital to me to have expanded access to Home Health Care services for King County residents. There exists current need for additional Home Health Agency in King County due to an increasing segment of our community that is aging. Home Health Care services provides a unique service to help our seniors, home bound patients with terminal illness, and minority populations. Wellspring Home Health Center has a history of providing superb care to Veterans, underserved, and vulnerable populations to live out their lives with dignity and respect. Wellspring is also financially and operationally prepared to develop and operate the proposed Medicare and Medicaid certified Home Health Agency to serve King County residents.

...

For these reasons, I urge you to approve Wellspring Home Health Center, LLC Certificate of Need Application to Establish a Medicare Certified and Medicaid Eligible Home Health Agency to serve King County."

Miguel D. Padilla, President, In Touch "We Care" Support Group

"As the President of In Touch 'We Care' Support Group, we are a 501C3 Nonprofit Organization which partners with organizations in the community with programs that supports Homeless Veterans, Surviving Spouses & their children, and the Alex Calliste Scholarship Fund.

...

Wellspring Home Health Center has an excellent history of providing superb care to Veterans. Their primary goal is to help Veterans and Surviving Spouses by providing personal care services designed to help them retain their quality of life and stay in their home to live out their lives with dignity and respect.

...

I urge you to approve Wellspring Home Health Center, LLC Certificate of Need Application to establish a Medicare certified and Medicaid eligible Home Health Agency to serve King County."

Isabella Colvin, President, Association of the United States Army

"As the president of the Association of the United States Army (AUSA) Captain Meriwether Lewis Chapter, a nonprofit educational and professional development association serving America's Army and supporters of a strong national defense. AUSA also provides a voice for the Army, supports the Soldier, and honors those who have served in order to advance the security of the nation.

...

Wellspring Home Health Center has a history of providing superb care to Veterans, underserved, and vulnerable populations to live out their lives with dignity and respect.

...

I urge you to approve Wellspring Home Health Center, LLC Certificate of Need Application to establish a Medicare certified and Medicaid eligible Home Health Agency to serve King County."

Rebuttal Comments

None

Department Evaluation

Wellspring has stated in its application and its public-facing website that it is dedicated to providing access to healthcare services to all persons regardless of their health, age, race, color, creed, gender, sexual orientation, or national origin.

Wellspring provided a copy of its Admission Policy, which describes the policy's eligibility and admission criteria, types of patients admitted, and process. The Admission Policy includes language to ensure all patients would be admitted for treatment without discrimination. The policy states: *"Patients are accepted for care without regard to age, race, color, creed, sex, national origin or handicap(s)."* [Source: March 26, 2021, screening response, Revised Exhibit 8A]

Wellspring anticipates through its projection period WHHC's Medicare net revenues will average 84.1% of total net revenues; Medicaid 3.3% of total net revenues; while commercial and other will average 12.6% of total net revenues. Wellspring provided a sound rationale for the basis of these figures and how they could be applicable to an agency serving King County. Wellspring's pro forma financial statements also show each of these revenues are anticipated in projections.

Wellspring also provided a copy of its Financial Assistance Policy which states its procedure, requirements, contact information, and its sliding scale of discount relative to income. Attached to the policy are some example forms. The pro forma financial statements provided by Wellspring also include charity care as a deduction from revenue.

Wellspring's assertions that it serves all populations, are affirmed by public comment which supports the Wellspring project. After reviewing the information received from the applicant and the public, the department concludes that the Wellspring project, **meets this sub-criterion.**

HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC

HLH provided copies of the following policies. [Sources: Application, pp24-28, pp31-41 and March 26, 2021, screening response, pdf9-10]

- Admissions Policy
- Charity Care Policy
- Patient Rights & Responsibilities Policy
- Non-discrimination & Grievance Policy
- Discharge Policy

HLH also provided the following statement related to this sub-criterion. [Source: Application, p22]
"Healthy Living at Home - Seattle, LLC will serve individuals with a wide variety of healthcare needs, many of whom have few other support resources for skilled routine medical or personal care. As a home-health care agency, Healthy Living at Home - Seattle will work with all racial and ethnic minorities, women, and people with disabilities. The Applicant will also develop preferred provider relationships with managed care payors servicing the King County area. Finally, the Applicant will provide charity care to clients as outlined in the question 11 below."

HLH provided the following clarification related to its admission policy, as to whether any patients would be denied services due to financial constraints. [Source: March 26, 2021, screening response, pdf8]
"No, patients are accepted based solely on our ability to properly meet their medical needs. At times, a particular payer may determine the level of care needed for their client or a particular contracted agency where they want the services provided. We will work with that provider to honor patient

preference and ensure that services are covered by the provider if possible. If not, the patient will be informed of any out of pocket uncovered costs they may incur by choosing our agency instead.”

HLH provided the following clarification related to the patients it expects to serve, and contingencies in place in case it does not have the resources to provide specialized care. [Source: May 28, 2021, screening response, pdf2]

“Yes. HLH Seattle has talked with A-One, Avail Home Health, Alliance Nursing Inc, and Maxim Healthcare Group who have confirmed that they provide pediatric home health services to clients under the age of eighteen (18). After licensing/credentialing, HLH Seattle will establish a Business Associate Agreement with these locations and will work with them on any pediatric referrals we may receive. HLH Seattle will not turn away pediatric referrals but will work with the responsible parties and referral sources to provide placement assistance for any pediatric referral or inquiry received. This will be done by providing them with a list of pediatric services available to them in their area and connecting them with an agency they select for services. HLH Seattle will continue to follow up with all parties to ensure that a successful handoff and start of care has been achieved.”

HLH provided the following additional statement related to its policies. [Source: March 26, 2021, screening response, pdf11]

“No, they are not currently in place. This is a new agency that does not have any patients at this time.”

HLH also provided the following payer mix associated with this project. [Source: Application, p47]

**Department’s Table 13
HLH’s Projected Payer Mix**

Revenue Source	Percent of Gross Revenue	Percent of Patients
Medicare	78%	70%
Medicaid	5%	10%
HMO	11%	12%
Private Pay	1%	1%
Commercial/Government/L&I	4%	7%
Total	99%*	100%

*Total may not equal 100% due to rounding

Public Comment

The following entity provided comment related to this sub-criterion. Following is an excerpt specific to this review sub-criterion.

Ernest Ibanga, President, Wellspring Home Health Center, LLC

“2. Comparative Analysis of Financial Assistance.

The second sub-criterion under WAC 246-310-210) is ‘(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.’

Both applicants submitted (1) admissions policies demonstrated non-discriminatory practices, (2) payer mix tables showing their intent to accept and treat Medicare and Medicaid patients and (3) financial assistance policies for uninsured persons unable to pay for services.

Regarding the financial assistance policies, we wish to highlight two strengths of Wellspring Home Health's policy, including its documentation of the sliding fee schedule and explicit reference that the policy also covers insured patients who indicate an inability to pay for their out-of-pocket responsibilities for the cost of care.

Sliding Fee Schedule

Wellspring Home Health's financial assistance policy documents the standard charity care discounts it will apply based on the patient's income as measured under the Federal Poverty Level guidelines (see Table 2 below).

Table 2. Wellspring Home Health Financial Assistance Discount Rate by Income Level	
Patient/Household Income Level	Discount Rate (%)
0-200% of the Federal Poverty Level (FPL)	100% Charity Care Discount
200% to 300% of FPL	75% Charity Care Discount
301% to 350% of FPL	50% Charity Care Discount
350% to 400% of FPL	25% Charity Care Discount

Source: CN 21-35 March 2021 Screening, p. 43

Healthy Living's financial assistance policy also allows for charity care, but it does not provide specifics discount rates by income level. Instead, it states that '...the Executive Director/Administrator, with the Clinical Director, will determine the appropriate payment plan schedule to be implemented.' Although these payment plans have the potential to be as generous as those specified in Wellspring's, we believe Wellspring's approach of including the sliding fee schedule within its financial assistance policy is a strength that shows its commitment to providing charity care to those in need.

Financial Assistance for Insured Patients

Wellspring Home Health's financial assistance policy explicitly references within the scope of the policy that it also will be available to insured patients: 'Any self-pay, uninsured patient who indicates an inability to pay will be screened for charity care. Additionally, at the discretion of the agency, any insured patient who indicates an inability to pay their liability after their insurance has paid may be screened for charity care.'

Healthy Living's charity care policy meanwhile states: 'Patients without third-party payer coverage and who are unable to pay for medically necessary care will be accepted for charity care admission by applying the following policy.' and '1. When it is identified that the patient has no source for payment of services and requires medically necessary care, the patient must provide...'

We recognize that Healthy Living did state it will be accessible to all persons and will provide financial assistance, but on a comparative basis, Wellspring Home Health's financial assistance policy is more generous based on the terms stated in the policy and supporting text provided through the CN process.

Rebuttal Comments

None

Department Evaluation

HLH has stated in its application that it is dedicated to providing access to healthcare services to all persons regardless of their race, color, religion, age, gender, sexual orientation, disability (mental or physical), communicable disease, or place of national origin.

HLH provided a copy of its Admission Policy, which describes the policy's purpose and admission criteria, and procedure. The Admission Policy includes language to ensure all patients would be admitted for treatment without discrimination. The policy states: "*Patients will be accepted for care without discrimination on the basis of race, color, religion, age, gender, sexual orientation, disability (mental or physical), communicable disease, or place of national origin.*" [Sources: Application, pp24-28 and March 26, 2021, screening response, pdf9]

HLH anticipates through its projection period its Medicare revenues will average 78% of total revenues; Medicaid 5% of total revenues; while commercial and other will average 16% of total revenues. HLH provided a sound rationale for the basis of these figures and how they could be applicable to an agency serving King County. HLH's pro forma financial statements also show each of these revenues are anticipated in projections.

HLH also provided a copy of its Charity Care Policy which states its purpose and procedure. The pro forma financial statements provided by HLH also include charity care as a deduction from revenue. Public comment was provided which compared aspects of the two applicants' charity policies and concluding that the Wellspring policy is superior based on its specificity in qualifying patients and the transparent presentation of the amount that would be covered. While the department concurs that the Wellspring Financial Assistance Policy may be more accessible when compared to the HLH Charity Care Policy, both policies meet the requirements necessary for this sub-criterion.

After reviewing the information received from the applicants, the department concludes that the HLH 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 these applications.

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

Wellspring Home Health Center, LLC dba Wellspring Home Health Center

Based on the source information reviewed and agreement to the conditions identified in the conclusion section of this evaluation, the department determines that the Wellspring Home Health Center project **meets** the applicable financial feasibility criteria in WAC 246-310-220.

HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC

Based on the source information reviewed and agreement to the conditions identified in the conclusion section of this evaluation, the department determines that the Healthy Living at Home – Seattle, LLC 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.*

WAC 246-310-220(1) 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 directs 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 each 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.

Wellspring Home Health Center, LLC dba Wellspring Home Health Center

Wellspring's project to offer King County residents Medicare and Medicaid-certified home health services includes operating out of an office in Lakewood, within a county adjacent to the service area, Pierce County. Wellspring provided the following assumptions used to determine the projected number of patients and visits for the proposed agency.

Applicant's Table

Table 6: Home Health Visit and Patient Projections, 2021 to 2024				
Home Health Visits	2021	2022	2023	2024
Months of Operation	2	12	12	12
Total Visits	902	8,412	10,164	12,036
Total Unduplicated Patients	37	342	413	453
Visits by Occupational Category	2021	2022	2023	2024
Skilled Nursing	361	3,365	4,066	4,814
Physical Therapy	316	2,944	3,557	4,213
Occupational Therapy	108	1,009	1,220	1,444
Speech Pathology	18	168	203	241
Medical Social Services	9	84	102	120
Home Health Aid	90	841	1,016	1,204
Sources: Applicant; See Table 7 and Table 8.				

[Source: Application, pp15-16]

“From Table 3, we project King County residents in need of Home Health services to equal 541,320 in 2021, 560,659 in 2022, and 580,804 in 2023. Extending this forecast for an additional year, we estimate this number to equal 601,790 in 2024. These numbers correspond to 45,110, 46,722, 48,400, and 50,149 visits per month in 2021, 2022, 2023, and 2024. We assume that, on a monthly basis, Wellspring Home Health will provide services to 1% of these patients in 2021, 1.5% in 2022, 1.75% in 2023, and 2% in 2024. Furthermore, we assume that, based on 2019 CMS numbers, the number of visits per patient are equal to 24.6. These statistics and assumptions, along with the implied utilization, are summarized in Table 7.

Table 7: Wellspring Home Health Utilization Assumptions					
Utilization Assumptions	Row	2021	2022	2023	2024
King County Visit Projections	1	541,320	560,659	580,804	601,790
Visits per Month	2	45,110	46,722	48,400	50,149
Assumed Market Share	3	1.00%	1.50%	1.75%	2.00%
Wellspring HH Visits per Month ([1]*[2]*[3])	4	451	701	847	1,003
Months of Operation	5	2	12	12	12
Wellspring HH Visits ([4]*[5])	6	902	8,412	10,164	12,036
Visits per Patient	7	24.6	24.6	24.6	24.6
Unduplicated Patients ([6]/[7])	8	37	342	413	453
Applicant and Medicare Home Health Agency Utilization by State, Current Year 2019 (https://www.cms.gov/files/document/cy-2019-medicare-home-health-utilization-state.pdf , Last Accessed November 5 ,2020)					

The number of visits by occupational category are calculated based on Wellspring's historical service mix in its Alaska facilities, but adjusted for anticipated differences in home health needs in

Washington State as observed in recent Certificate of Need decisions. We present these assumptions in Table 8.

Table 8: Assumed Proportions of Home Health Visits by Occupational Category	
Occupational Category	Proportion
Skilled Nursing	40.00%
Physical Therapy	35.00%
Occupational Therapy	12.00%
Speech Pathology	2.00%
Medical Social Services	1.00%
Home Health Aid	10.00%
Sources: Applicant	

In support of the reasonableness of our utilization assumptions, we note that, based on the methodology above, there exists significant excess demand for home health services within King County. Our utilization assumptions imply that in 2024 (Year 3), the projected Wellspring visits account for only 5% of this excess demand.” [Source: Application, pp16-17]

Based on these assumptions, Wellspring provided the following projections for utilization of the home health agency. [Sources: Application, p16 and March 26, 2021, screening response, Revised Exhibit 10B]

**Department’s Table 14
WHHC’s Projected Utilization**

	FY 2021	FY 2022	FY 2023	FY 2024
Unduplicated Patients	37	342	413	489
Total Visits	902	8,411	10,164	12,036
Market Share	1.00%	1.50%	1.75%	2.00%

Wellspring provided the following assumptions used to determine the financial feasibility for the proposed King County operations.

Applicant's Table

Wellspring Home Health Center, LLC Financial Model Assumptions

Unless otherwise noted, the assumptions are based on average of public documents for other home projects similar to Wellspring's proposed project ("Washington Benchmarks")

<i>Gross Revenue Per Visit</i>	Calculation Method	Estimate
Skilled Nursing	Gross Revenue Per Visit	\$243
Physical Therapy	Gross Revenue Per Visit	\$207
Occupational Therapy	Gross Revenue Per Visit	\$213
Speech Pathology	Gross Revenue Per Visit	\$242
Medical Social Services	Gross Revenue Per Visit	\$228
Home Health Aid	Gross Revenue Per Visit	\$124
<i>Gross Revenue Payer Mix</i>	Calculation Method	Estimate
Medicare	% of Gross Revenue	77%
Medicaid	% of Gross Revenue	6%
Commercial/Other	% of Gross Revenue	17%
<i>Deductions from patient service revenue</i>	Calculation Method	Estimate
Contractual Adjustments		
Medicare	% of [Payer] Gross Revenue	7%
Medicaid	% of [Payer] Gross Revenue	53%
Commercial/Other	% of [Payer] Gross Revenue	37%
Bad Debt	% of Gross Revenue	1.3%
Charity Care	% of Gross Revenue	1.6%
<i>Operating Expenses</i>	Calculation Method	Estimate
Salaries	See Staffing Worksheet	See Staffing Worksheet
Benefits	% of Salaries	30.2%
		\$20K annual maintenance fee. \$150/hr service fees assumed at 5 hours per month in 2021 and 10 hours per month assumed in 2022-2024
Medical Director*	MDA Section 4	
Supplies	Per Visit	3.7
Base Rent*	Lease Section 1.7 (Monthly)	1,500
Other Property Expenses*	Lease Section 1.7 (Monthly)	291
Information Technology	Annual Amount Adj by # Months	22,700
Equipment	Annual Amount Adj by # Months	5,600
Maintenance	Annual Amount Adj by # Months	700
Purchased Services	Per Visit	9.3
Mileage & Travel	Per Visit	5.0
B & O Tax	% of Net Revenue	1.50%
Other Expenses	Per Visit	1.1
<i>Non-Operating Expenses</i>	Calculation Method	Estimate
Overhead Allocation	% of Net Revenue	4.5%
Depreciation & Amortization*	See Depreciation Worksheet	See Depreciation Worksheet

*Not based on Washington Benchmarks

[Source: May 19, 2021, screening response, Revised Exhibit 10B]

Applicant's Table

Wellspring Home Health Center, LLC Staffing Worksheet						
			PY 2021	2022	2023	2024
# of Months			2	12	12	12
Visits			PY 2021	2022	2023	2024
	Skilled Nursing		361	3,365	4,066	4,814
	Physical Therapy		316	2,944	3,557	4,213
	Occupational Therapy		108	1,009	1,220	1,444
	Speech Pathology		18	168	203	241
	Medical Social Services		9	84	102	120
	Home Health Aid		90	841	1,016	1,204
	Total Visits		902	8,411	10,164	12,036
Clinical FTEs		FTEs Per 1,000 Visits	PY 2021	2022	2023	2024
	Skilled Nursing	1.01	0.36	3.40	4.11	4.86
	Physical Therapy	0.86	0.27	2.53	3.06	3.62
	Occupational Therapy	0.82	0.09	0.83	1.00	1.18
	Speech Pathology	0.84	0.02	0.14	0.17	0.20
	Medical Social Services	0.86	0.01	0.07	0.09	0.10
	Home Health Aid	0.77	0.07	0.65	0.78	0.93
	Total Clinical FTEs		0.82	7.62	9.21	10.89
Management and Non-Clinical FTEs			PY 2021	2022	2023	2024
	Manager / Administrator		0.17	1.00	1.00	1.00
	Director of Nursing and Clinical Services		0.17	1.00	1.00	1.00
	Business/Clerical		0.33	2.50	2.50	3.00
	Total Non-Clinical FTEs		0.67	4.50	4.50	5.00
Salaries		Salaries Per FTE	PY 2021	2022	2023	2024
	Skilled Nursing	81,101	29,196	275,743	333,325	394,151
	Physical Therapy	89,911	24,276	227,475	275,128	325,478
	Occupational Therapy	89,817	8,084	74,548	89,817	105,984
	Speech Pathology	91,280	1,826	12,779	15,518	18,256
	Medical Social Services	67,169	672	4,702	6,045	6,717
	Home Health Aid	35,814	2,507	23,279	27,935	33,307
	Manager / Administrator	89,496	15,214	89,496	89,496	89,496
	Director of Nursing and Clinical Services	89,496	15,214	89,496	89,496	89,496
	Administrative and Clerical	48,696	16,070	121,740	121,740	146,088
	Total Salaries		113,058	919,258	1,048,500	1,208,973

[Source: May 19, 2021, screening response, Revised Exhibit 10B]

Wellspring's payer mix assumptions are detailed earlier in this evaluation⁷ and will not be repeated here.

Related to how it formed staffing ratios for this project, Wellspring provided the following information and clarification.

"The staff to visit ratios were constructed based on Washington Benchmarks estimated from based on public documents for other home projects similar to Wellspring's proposed project." [Source: Application, p26]

⁷ Payer mix assumptions are detailed under the section for WAC 246-310-210(2)

“The Washington benchmarks are based on review of the following certificate of need approved Washington projects:

+ Amicable Healthcare, Inc. - CN App #19-52

+ Providence Home Health - CN App #20-24

+ EmpRes Healthcare Group, Inc (Eden Home Health) - CN App #19-67”

Based on these assumptions, Wellspring provided its projected revenue, expenses, and net income for the agency for projection years 2022 through 2024, which are summarized in the following table.

[Source: May 19, 2021, screening response, Revised Exhibit 10B]

Department’s Table 15
Wellspring’s King County Projected Revenues and Expenses Summary
Years 2022 through 2024

	CY 2022	CY 2023	CY 2024
Net Revenue	\$1,485,347	\$1,794,941	\$2,125,446
Total Expenses	\$1,539,594	\$1,759,925	\$2,024,446
Net Profit / (Loss)	(\$54,247)	\$35,016	\$101,000

Here “*Net Revenue*” includes gross revenue minus contractual allowances, bad debt, and charity care; and “*Total Expenses*” includes direct expenses, as well as administrative costs.

Additionally, Wellspring provided the projected cash flow pro forma including projection years 2022 through 2024 for its proposed agency. [Source: May 19, 2021, screening response, Revised Exhibit 10B]

Applicant's Cash Flow

Wellspring Home Health Center, LLC Cash Flow Statement (WA Only)					
	YEAR 0 PY 2021	-----Forecast-----			
		Year 1 2022	Year 2 2023	Year 3 2024	
Beginning Balance	\$ -	\$ (27,581)	\$ (84,828)	\$ 10,207	
<u>CASH INFLOWS</u>					
<u>Investment Income</u>					
Short term Investment					
<u>Loan & Equity proceeds</u>					
Equity for Project Capital Exp	\$ 25,000				
Equity - Other					
Working Capital Loan					
Subtotal Cash Proceeds	\$ 25,000	\$ -			
<u>Net Revenue</u>					
Net Revenue	\$ 159,305	\$ 1,485,347	\$ 1,794,940	\$ 2,125,446	
<u>Adjustments</u>					
Days in A/R (50 days)	\$ (21,823)	\$ (203,472)	\$ (245,882)	\$ (291,157)	
A/R from prior year		\$ 21,823	\$ 203,472	\$ 245,882	
Total Cash inflows	\$ 162,482	\$ 1,303,698	\$ 1,752,530	\$ 2,080,171	
<u>CASH OUTFLOWS</u>					
<u>Capital Expenditures</u>	\$ 25,000				
<u>Operating Expenses</u>					
Direct Costs	\$ 180,069	\$ 1,468,297	\$ 1,674,695	\$ 1,924,344	
Days in A/P (30 Days)	\$ (15,006)	\$ (122,358)	\$ (139,558)	\$ (160,362)	
A/P from prior year		\$ 15,006	\$ 122,358	\$ 139,558	
Interest & Depreciation	\$ 743	\$ 4,457	\$ 4,457	\$ 4,457	
Subtotal Operating Expenses	\$ 165,806	\$ 1,365,402	\$ 1,661,952	\$ 1,907,997	
<u>Existing Debt</u>					
Working Capital Repayment	\$ -	\$ -	\$ -	\$ -	
Principal Repayment	\$ -	\$ -	\$ -	\$ -	
<u>Adjustments</u>					
Depreciation	\$ (743)	\$ (4,457)	\$ (4,457)	\$ (4,457)	
Subtotal Adjustments	\$ (743)	\$ (4,457)	\$ (4,457)	\$ (4,457)	
Total Cash Outflows	\$ 190,063	\$ 1,360,944	\$ 1,657,495	\$ 1,903,540	
Increase (Decrease)	\$ (27,581)	\$ (57,247)	\$ 95,035	\$ 176,631	
*Any negative cash flow in a year specific to the proposed project will be covered by Wellspring Home Health Center, LLC reserves. See Wellspring (AK + WA) balance sheet that demonstrates Wellspring has sufficient cash reserves, as well as Application Exhibit 11 for a letter of financial commitment from Wellspring's administrator. Further, see Screening1 Exhibit 16 for an attestation letter from Key Bank that Wellspring has a revolving line of credit of \$100,000 available to be utilized in case of cash flow need.					

Wellspring additionally submitted the projected balance sheets for the proposed agency as well as the funding entity's balance sheets. The following tables summarize years 2022 through 2024. [Source: May 19, 2021, screening response, Revised Exhibit 10B]

Department's Table 16
Wellspring's King County Balance Sheets' Summary
Years 2022 through 2024

ASSETS	CY 2022	CY 2023	CY 2024
Current Assets	\$89,968	\$201,841	\$513,009
Property & Equipment	\$19,800	\$15,343	\$10,886
Other Assets	\$0	\$0	\$0
Total Assets	\$109,768	\$217,184	\$523,895
LIABILITIES	CY 2022	CY 2023	CY 2024
Current Liabilities	\$122,358	\$139,558	\$160,362
Long Term Liabilities	\$0	\$0	\$0
Total Capital	(\$12,590)	\$77,626	\$363,534
Total Liabilities & Capital	\$109,768	\$217,184	\$523,896

Department's Table 17
Wellspring's Washington & Alaska Balance Sheets' Summary
Years 2022 through 2024

ASSETS	CY 2022	CY 2023	CY 2024
Current Assets	\$2,647,422	\$2,759,294	\$3,070,464
Property & Equipment	\$159,674	\$155,217	\$150,760
Other Assets	\$28,525	\$28,525	\$28,525
Total Assets	\$2,835,621	\$2,943,036	\$3,249,749
LIABILITIES	CY 2022	CY 2023	CY 2024
Current Liabilities	\$904,811	\$922,011	\$942,815
Long Term Liabilities	\$0	\$0	\$0
Total Capital	\$1,930,811	\$2,021,026	\$2,306,935
Total Liabilities & Capital	\$2,835,622	\$2,943,037	\$3,249,750

Public Comment

The following entity provided comment related to this sub-criterion. Included here is an excerpt specific to financial feasibility of Wellspring's project.

John Colvin, Treasurer, Thurston County Veteran Services

"Wellspring is also financially and operationally prepared to develop and operate the proposed Medicare and Medicaid certified Home Health Agency to serve King County residents."

Rebuttal Comments

None

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 Wellspring to determine the projected number of patients and visits by discipline for the proposed agency. Wellspring did so by first estimating the number of King County residents in need of home health services by year, then

estimating a conservative market share of these patients that grows with each projection year from 1.00% in year 2021 to 2.00% in year 2024. Then estimates its projected visits per month and then per year. Then last, using a consistent year over year visit per patient calculated its unduplicated patients. The department concludes that Wellspring's utilization assumptions are reasonable.

Pro Forma Financial Statements

The applicant provided pro forma financial statements, including the revenue and expense statements, balance sheets, and cash flow statements, which allows the department to evaluate the financial viability of the proposal.

Wellspring based its anticipated revenue and expenses for its proposed agency on the earlier discussed average of public documents for other home health projects similar to Wellspring's proposal, Washington benchmarks. Based on this, and assumptions listed earlier in this section, Wellspring expects the King County agency to have a slow start with a net loss of \$54,247 in its first full year of operation; which grows to a net profit of \$101,000 by its third full year of operation.

The home health agency's office space will be located at 8815 South Tacoma Way, Suite 120, Lakewood [98498] within Pierce County. Wellspring provided documentation that the office and land is owned by the entity in its lease agreement. Additionally, Wellspring provided copies of a single line drawing of the office space to be used, and costs associated with use of the space. Wellspring also accounted for the lease expenses in its projected revenue and expense statements as a line item "*Base Rent*" and "*Other Property Expenses*" The anticipated expenses in financial statements match those assumed by the applicant. [Sources: Application, Exhibit 4A and 4B and May 19, 2021, screening response, Exhibit 10B]

Wellspring provided an executed agreement for the Medical Director, Amar Kapur, MD. The medical director agreement identifies the responsibilities of both the home health agency and its medical director, and the projected revenue and expense statements identify all costs associated with this agreement are included in line items "*Medical Director*". [Sources: March 26, 2021, screening response, Revised Exhibit 2 and May 19, 2021, screening response, Revised Exhibit 10B]

The department also reviewed the projected balance sheets for Wellspring's King County proposal. As previously stated, the purpose of the balance sheet is to review the financial status of the home health agency at a specific point in time. The balance sheet shows what the home health agency owns (assets) and how much it owes (liabilities), as well as the amount invested in the business (equity). Tables 16 and 17 summarize the projected balance sheets provided by the applicant for King County operations alone and alongside Wellspring's Alaska operations. Projected balance sheets provided in the review shows the agency is expecting to balance assets and liabilities through the projection period.

After reviewing the information provided by the applicant, public comment which only reinforced Wellspring's financial assertions and documentation, the department concludes that the Wellspring project, **meets this sub-criterion.**

HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC

HLH's project to offer King County residents Medicare and Medicaid-certified home health services includes operating out of an office in Renton, within King County. HLH provided the following

assumptions used to determine the projected number of patients and visits for the proposed agency.
[Source: May 28, 2021 screening response, Excel spreadsheets]

“Avg of 14.44 total visits per unduplicated admission rounded down for each discipline

Healthy Living at Home - Vancouver & Portland Average Visits per episode (non-Lupa, non duplicated pts)

Source for patients' and visits by discipline, by year, is derived from Healthy Living at home - Vancouver and Portland historical data from agency inception excluding duplicated patients.

Total monthly visits post certification is based on ending patient census for the month x 7.2 visits for that month

2022 & 2023 assumes a 216% increase of new admissions from the previous years data while 2023 & 2024 assumes a 154% increase. This is based on significant short term growth for a new agency until it matures by year four or five and achieves a nominal 10 - 15% thereafter. We have based this assumption on historical first hand data from Healthy Living at Home - Vancouver and Portland.

For partial year calculation, it is assumed that we will have a total of 15 episodes (roughly admitting 10 - 15 patients for credentialing purposes). 15 episodes x avg of 14.44 visits/episode = 217. Calculations on 'Summary' tab are rounding down visit counts thus totaling roughly 214 visits to be conducted in 2021.

Discharge 80% of prior 60 day's census

Recertification Amount 20% of prior 60 day's census

Discharge and recertification amounts using first hand Healthy Living Data”

Based on these assumptions, HLH provided the following projections for visits and utilization of the home health agency. [Source: May 28, 2021 screening response, Excel spreadsheets]

Applicant's Tables

** Healthy Living at Home - Vancouver & Portland Average Visits per episode (non-Lupa, non duplicated pts)					
Discipline	Healthy Living at Home - Portland		Healthy Living at Home - Vancouver		AVG*
Skilled Nursing	4.6	30%	5.7	42%	36%
Physical Therapy	7.7	51%	5	36%	44%
Occupational Therapy	2	13%	2.3	17%	15%
Speech Therapy	0.2	1%	0.3	3%	2%
Medical Social Work	0.3	2%	0.2	1%	2%
Home Health Aide	0.2	1%	0.1	1%	1%
Registered Dietician	0.1	1%	0	0%	0%
Total	15.1	100%	13.6	100%	14.4
*Combined averages from Healthy Living at Home - Portland and Vancouver Data (2020)					

Visits by discipline (a)	% of Visits	2021	2022	2023	2024
RN	36%	77	1585	3430	5302
PT	44%	95	1937	4193	6480
HHA	1%	2	44	95	147
OT	15%	32	660	1429	2209
SLP	2%	4	88	190	294
MSW	2%	4	88	190	294
Total Visits	100%	214	4402	9527	14726
Unduplicated pts (b)		15	305	660	1020
Total Visits	14.44	217	4404	9530	14729

Utilization forecast by discipline serving King County 2022 to 2024				
Year	2021	2022*	2023*	2024
Unduplicated Admissions	15	305	660	1,020
Visits by discipline**				
Skilled Nursing	77	2039	4567	7098
Physical Therapy	94	2492	5582	8675
Occupational Therapy	32	849	1903	2958
Speech Therapy	4	113	254	394
Medical Social Work	4	113	254	394
Home Health Aide	2	57	127	197
Total Visits (a)	214	5,663	12,685	19,717

HLH provided the following assumptions used to determine the financial feasibility for the proposed King County operations.

Applicant's Financial Assumptions

*All 2021 costs are start up costs before Medicare and Medicaid accreditation and include expenses related to seeing necessary 10 - 15 probono patients for accreditation.
Gross Margin = Net Revenue - Total Direct Patient Care Costs
Margin Increase in year 3 due to efficiencies gained with direct labor staff optimization
Fee increase in 2023
Anticipate 3% bad debt to total revenue (based on experience)
Business Development Budget Increase in 2023
YR 1 = 4 hrs per month, YR 2 = 5 hrs per month, YR 3 = 6 hrs per month
Annual Education Budget increase with new staff
Consistent YoY fee estimate
Consistent YoY fee estimate
2021 costs minimal with a move to a bigger office in 2022 with an estimated increased cost of 5% in 2023 and 2024
Consistent YoY fee estimate - based on historical exp with HLH Vancouver and Portland
Growth based on additional FTEs
Liability Insurance consistent over a 3 year period
Office Supplies Budget consistent over a 3 year period
Payroll Fees consistent over 3 year period
Consistent YoY fee estimate
Consistent YoY fee estimate
est @ 1% of Total Direct Cost of Labor
Stipend for DPCS at \$450 per month
Consistent YoY fee estimate
EBITDA = Gross Margin - Total Op Expenses
Management fee of 6.5% of revenue
Corp tax at 21% ; ((EBITDA - HLNLR Management Fees)*0.21)
Net Profit = EBITDA - HLNLR Mgmt. Fees - Taxes Incurred

[Source: May 28, 2021 screening response, Excel spreadsheets]

FIELD STAFF PERSONNEL				
	2021	2022	2023	2024
Field Staff Count				
Registered Nurse-FTE	0.5	2.1	4.8	6.9
Physical Therapist-FTE	0.5	2.6	5.8	8.7
Occupational Therapist-FTE	0.5	0.9	2.0	3.0
Speech Language Pathologist	0.1	0.2	0.4	0.5
Medical Social Worker	0.1	0.2	0.4	0.5
Home Health Aide	0.1	0.1	0.2	0.3
Total Field Staff	1.8	6.0	13.4	20.0
Salary Per Position				
Registered Nurse-FTE	\$83,232	\$83,232	\$83,232	\$83,232
Physical Therapist-FTE	\$104,040	\$104,040	\$104,040	\$104,040
Occupational Therapist-FTE	\$104,040	\$104,040	\$104,040	\$104,040
Speech Language Pathologist	\$104,040	\$104,040	\$104,040	\$104,040
Medical Social Worker	\$72,828	\$72,828	\$72,828	\$72,828
Home Health Aide	\$37,454	\$37,454	\$37,454	\$37,454
Payroll Per Position (Count x Salary)				
Registered Nurse-FTE	\$6,936	\$176,752	\$395,935	\$573,787
Physical Therapist-FTE	\$8,670	\$270,038	\$604,900	\$908,988
Occupational Therapist-FTE	\$8,670	\$92,059	\$206,216	\$310,119
Speech Language Pathologist	\$1,734	\$16,366	\$36,661	\$56,982
Medical Social Worker	\$1,214	\$11,456	\$25,662	\$39,887
Home Health Aide	\$624	\$2,946	\$6,599	\$10,257
Total Field Staff Payroll	\$27,848	\$569,617	\$1,275,973	\$1,900,020
TOTAL PERSONNEL BREAKDOWN				
	2021	2022	2023	2024
Total Personnel	2.8	9.9	22.4	31.9
Total Payroll	\$38,348	\$909,534	\$1,940,890	\$2,786,936
Payroll/Revenue	0.00%	72.01%	68.60%	63.37%

[Source: March 26, 2021 screening response, pdf26]

ADMINISTRATIVE/OFFICE PERSONNEL				
	2021	2022	2023	2024
Administrative Staff Count				
Administrator	0.0	0.0	0.0	0.0
Director of Patient Care Svcs	1.0	1.0	1.0	1.0
Assistant Director of Clinical Svcs	0.0	0.0	1.0	1.0
Business Office Manager	0.0	0.0	0.0	0.0
Clinical Supervisor	0.0	0.0	0.6	1.9
Intake/Scheduling	0.0	1.0	1.0	2.0
Administrative Asst/Reception	0.0	0.0	1.0	1.0
Non-Clinical Case Manager	0.0	0.0	1.0	1.0
Area Director	0.0	1.9	3.3	4.0
Total Administrative Staff	1.0	3.9	8.9	11.9
Salary Per Position				
Administrator	\$0	\$0	\$0	\$0
Director of Patient Care Svcs	\$10,500	\$125,000	\$125,000	\$125,000
Assistant Director of Clinical Svcs	\$0	\$100,000	\$100,000	\$100,000
Business Office Manager	\$0	\$45,000	\$45,000	\$45,000
Clinical Supervisor	\$0	\$85,000	\$85,000	\$85,000
Intake/Scheduling	\$0	\$52,000	\$52,000	\$52,000
Administrative Asst/Reception	\$0	\$27,500	\$27,500	\$27,500
Non-Clinical Case Manager	\$0	\$27,500	\$27,500	\$27,500
Area Director	\$0	\$85,000	\$85,000	\$85,000
Payroll Per Position (Count x Salary)				
Administrator	\$0	\$0	\$0	\$0
Director of Patient Care Svcs	\$10,500	\$125,000	\$125,000	\$125,000
Assistant Director of Clinical Svcs	\$0	\$0	\$100,000	\$100,000
Business Office Manager	\$0	\$0	\$0	\$0
Clinical Supervisor	\$0	\$0	\$49,583	\$162,917
Intake/Scheduling	\$0	\$52,000	\$52,000	\$104,000
Administrative Asst/Reception	\$0	\$0	\$27,500	\$27,500
Non-Clinical Case Manager	\$0	\$0	\$27,500	\$27,500
Area Director	\$0	\$162,917	\$283,333	\$340,000
Total Admininstrative/Office Payr	\$10,500	\$339,917	\$664,917	\$886,917

[Source: March 26, 2021 screening response, pdf25]

“We will not have any FTE costs until the certificate of need process is approved after which we will incur expenses related to seeing the necessary 10 - 15 pro bono patients for accreditation purposes.

Our contractual allowances are calculated and reflected in the Revenue Forecast and are currently set at 2% of total revenue. That number impacts the Gross Margin shown in the Pro Forma Profit and Loss listed.

a. Medical supplies

Based on network experience of operating in Clark County and Portland we anticipate our average costs being approximately \$5.20 each visit.

b. Audit/Accounting Fees

Based on network experience of operating in Clark County and Portland and typical costs associated with HLNR accounting and auditing teams.

c. Staff payroll taxes (field and office staff)

Payroll taxes based on roughly 7% of salaries/wages.

d. Workers' compensation

This was based on the network's experience of operating in Clark County and Portland.

e. Health insurance

Based on network experience of operating in Clark County and Portland and group purchasing power with HLNR - avg costs per FTE.

f. Taxes & Licenses

Based on avg yearly costs for Joint Commission Accreditation and State license renewal fees.

g. Depreciation

Based on Equipment/CapEx depreciated over a 15 year period. In this case, \$9,828/15 years = \$655/year."

2021 includes all capital and start up costs associated with the licensing and accreditation of this agency. It is assumed that our first billable patient will be seen Jan 2022 after we are accredited.

Based on a 30 Daily Sales Outstanding (DSO) amount.

Based on 50% of Dec Salaries x 2 months of ops invoices

Note payable to HLH Capricorn Holdings for additional cash contributed

If we do not receive CON approval, our only expenses will be the CON license/fee, small office space for one year, and audit/accounting fees in 2021.

We would close down everything at the end of the year 2021 and return any remaining cash to the owners.

[Source: May 28, 2021 screening response, Excel spreadsheets]

HLH's payer mix assumptions are detailed earlier in this evaluation⁸ and will not be repeated here.

Based on these assumptions, HLH provided its projected revenue, expenses, and net income for the proposed agency for projection years 2022 through 2024. Projections are summarized in the following table. [Source: May 28, 2021 screening response, Excel spreadsheets]

Department's Table 18
HLH's King County Projected Revenues and Expenses Summary
Years 2022 through 2024

	CY 2022	CY 2023	CY 2024
Net Revenue	\$1,225,175	\$2,744,457	\$4,265,725
Total Expenses	\$1,225,913	\$2,594,847	\$3,814,914
Net Profit / (Loss)	(\$738)	\$149,610	\$450,811

HLH additionally submitted projected balance sheets for the proposed agency. The following table summarizes projection years 2022 through 2024. [Source: May 28, 2021 screening response, Excel spreadsheets]

⁸ Payer mix assumptions are detailed under the section for WAC 246-310-210(2)

Department's Table 19
HLH's King County Balance Sheets' Summary
Years 2022 through 2024

ASSETS	CY 2022	CY 2023	CY 2024
Current Assets	\$165,470	\$364,866	\$788,254
Property & Equipment	\$9,173	\$8,518	\$7,862
Other Assets	\$0	\$0	\$0
Total Assets	\$174,643	\$373,384	\$796,116
LIABILITIES	CY 2022	CY 2023	CY 2024
Current Liabilities	\$71,944	\$131,430	\$176,675
Long Term Liabilities	\$83,681	\$73,324	\$0
Total Capital	\$19,018	\$168,630	\$619,441
Total Liabilities & Capital	\$174,643	\$373,384	\$796,116

Public Comment

The following entity provided comment related to this sub-criterion. Following is an excerpt specific to this review sub-criterion.

Ernest Ibanga, President, Wellspring Home Health Center, LLC

“3. Analysis of Utilization Assumptions.”

In its March 26th screening responses, Healthy Living provided the following utilization forecast table and a summary explanation of the assumptions that these projections were based on (replicated in Table 3 below).”

Commenter's Table

Table 3. [March 26th Screening] Healthy Living Utilization Forecast, 2022-2024			
COUNTY	2022	2023	2024
Total number of admissions	305	660	1,020
Total number of visits*	5,662	12,685	19,717
Projected number of visits/patient	14.44	14.44	14.44
<small>*Total number of visits over a sixty day episode include recertified patients. Based on applicant's experience in Clark County and the Portland Oregon area, it is estimated that 20% of patients will be recertified every sixty days. Total visit count is determined by ending census each month * 7.22 visits per patient with patients staying on service for a full sixty days (14.44 visits per patient over a sixty day episode).</small>			
Source: CN 21-44 Screening, March 26, 2021, p. 7.			

[Source: Wellspring's public comments, p6]

“In its May 28th screening responses, Healthy Living proceeded to provide an Excel Spreadsheet, self-titled ‘King Co Utilization Info’, to clarify the assumptions used to construct its utilization forecast. That file continued to show the same total number of visits and unduplicated admissions figures as was provided in its March screening responses. The May 28th utilization table is provided below as Table 4.”

Commenter's Table

Table 4. [May 28th Screening] Healthy Living Utilization forecast by discipline serving King County 2022 to 2024

Year	2021	2022*	2023*	2024
Unduplicated Admissions (b)**	15	305	660	1,020
Visits by discipline**				
Skilled Nursing	77	2039	4567	7098
Physical Therapy	94	2492	5582	8675
Occupational Therapy	32	849	1903	2958
Speech Therapy	4	113	254	394
Medical Social Work	4	113	254	394
Home Health Aide	2	57	127	197
Total Visits (a)	214	5,663	12,685	19,717

*2022 & 2023 assumes a 216% increase of new admissions from the previous years data while 2023 & 2024 assumes a 154% increase. This is based on significant short term growth for a new agency until it matures by year four or five and achieves a nominal 10 - 15% thereafter. We have based this assumption on historical first hand data from Healthy Living at Home - Vancouver and Portland.

**Source for patients' and visits by discipline, by year, is derived from Healthy Living at home - Vancouver and Portland historical data from agency inception excluding duplicated patients.

[Source: Wellspring's public comments, p6]

“The May 28th screening responses also highlights the 14.44 projected number of visits per patient assumption. However, using 2024 as an example, dividing the total visits (19,717) by the total unduplicated admissions (1,020) equals an average of 19.33. Part of this may be due to the 20% of recertified patients and escalating new patient admissions by month provided in the ‘Detail’ worksheet of the Excel spreadsheet. What is unclear though is how the top table on the ‘Summary’ worksheet that shows different visits by discipline tie to the other visits by discipline table in the ‘Summary’ worksheet that has been replicated in Table 4 above. The top table in the ‘Summary’ worksheet reports 14,729 visits and 1,020 unduplicated patients which would result from the stated 14.44 visits/patient assumption.

Although we have questions about some of the underlying assumptions, we acknowledge that Healthy Living’s total visit count by its third full year (19,717) can still be supported given the tremendous unmet need currently existing in King County.

Based on the State Health Plan forecast methodology and the Department’s evaluation used in its December 2019 denial of CN 20-02, we estimate net need of over 280,000 home health visits by King County residents by 2024 (see Table 5 below). This translates to approximately 11,500 planning area residents in need of home health services in King County by 2024. Further, there is an estimated 60,540 incremental new visits estimated from growth in 2022, 2023, and 2024 alone. Thus, this more than supports both applicants’ volume forecasts and further demonstrates neither applicant will have a negative impact on existing planning area providers, as the incremental visit volume (60,540) in 2022-2024 alone in King County is a 1.9X multiple of the combined 2024 visit count of Wellspring and Healthy Living (12,036 + 19,719 = 31,753 visits).”

Commenter's Table

Table 5. King County Home Health Service Need, 2021-2024				
	2021	2022	2023	2024
Total Visits (Demand) ¹	542,934	563,114	583,294	603,474
+Incremental Visits	-	20,180	20,180	20,180
Total Visits (Supply) ²	320,000	320,000	320,000	320,000
Total Visits (Net Need)	222,934	243,114	263,294	283,474
Patients (Net Need) ³	9,062	9,883	10,703	11,523
¹ Assumes 2024 total visits is equal to 2023 visits (583,294) plus 20,180.				
² 32 Existing Agencies at 10,000 Visits Per Agency				
³ Assumes 24.6 visits per patient.				
Source: 2021-2023 Demand and Supply based on data from Attachment A in Department Evaluation of CN20-02.				

[Source: Wellspring's public comments, p7]

"1. Sensitivity Analysis of Financial Projections.

As referenced above in Table 3, Healthy Living's utilization forecast assumes a relatively high number of total visits (19,717 visits) by its third full year of operation (2024) compared to the minimum visit standard established in the Department's need methodology (10,000 visits) and Wellspring's volume projections (12,036 total visits by 2024). Again, Wellspring views the high unmet need for additional home agencies as clear support for the volume forecast by both Healthy Living and Wellspring.

Healthy Living and Wellspring's pro forma models demonstrated financial viability by its third full year of operation. Healthy Living's pro forma provided in its May 2021 screening responses show positive net income of \$450,811 by 2024. Wellspring's pro forma provided in Revised Exhibit 10B of its March 2021 screening responses demonstrates positive net income of \$217,524 in 2024 even though Wellspring's forecast of 12,036 total visit by 2024 is conservative compared to Healthy Living's projections of 19,717 visits.

Included below in Table 6 is a sensitivity analysis demonstrating that had Wellspring made volume assumptions similar to Healthy Living, then it would have shown even stronger financial viability for its project."

Commenter's Table

Table 6. Wellspring Home Health Financial Model Sensitivity Analysis	
2024 Total Visits	2024 Net Income
12,036 Visits (CN Forecast)	\$217,524
20,000 Visits (Sensitivity Test)	\$622,905

[Source: Wellspring's public comments, p8]

Rebuttal Comments

None

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 HLH to determine the projected number of patients and visits by discipline for the King County agency. Using the knowledge of its two urban regional affiliate's existing home health operations HLH was able to use averages of the two to determine assumptions listed earlier in this section. With this HLH also assumed an aggressive startup that matures and levels off in later years.

There was a substantial analysis provided in public comment on HLH's utilization assumptions, some of which is characterized HLH's information as unclear. The commenter questions the projected number of visits by patient assumed in HLH's application. The department concurs that the HLH projected number of visits relative to Wellspring's is ambitious. However, the commenter does not assert that the projections are unreasonable or unachievable. Rather, they could be considered ambitious. The department also concurs that the projections are ambitious, but not unreasonable. Further, the same commenter also states King County home health need is significant enough to support both applicants' projected visits. The department also concurs with this assertion.

Based on HLH's assumptions, rigorous calculations, the department's understanding of HLH's calculations, and lack of objection from public comment. The department concludes that HLH's utilization assumptions are acceptable.

Pro Forma Financial Statements

The applicant provided pro forma financial statements, including the revenue and expense statements, balance sheets, and cash flow statements, which allows the department to evaluate the financial viability of the proposal.

HLH based its anticipated revenue and expenses for its proposed agency on the assumptions referenced earlier. HLH used its affiliates' experience operating two regional and urban home health agencies as a basis for the anticipated revenue, expenses, and payer mix. HLH expects a slow start up, which results in a net loss of \$738 for King County for its first full year. But the subsequent year and third full year (2023 and 2024) there is enough growth that HLH anticipates a net profit of \$149,610 and \$450,811 respectively.

Public comment was provided comparing both applicants' pro forma models and states that Wellspring's utilization forecasts are relatively conservative, and that if looking at a visit to net income ratio, Wellspring appears to operate more efficiently. Although this analysis is interesting, the commenter also recognizes that both applicant's pro forma models demonstrate financial viability by the third full year of operation.

The home health agency plans lease office space located at 707 South Grady Way, Suite 600, Renton [98057] within King County. HLH provided copies of a signed lease, single-line drawings of the space, and accounted for all costs associated with the lease expense in its projected revenue and expense statements as a line item "*Facilities – Rent / Prop. Mgmt. Fee.*" The anticipated amounts match those in the lease agreement. [Source: May 28, 2021, screening response, pdf pp5-27]

HLH also provided an Operating Agreement between the applicant HLH, and its parent HLH Seattle Holdings, LLC. The agreement identifies the roles and responsibilities of both the home health

agency and the Company, and the projected revenue and expense statements identify all costs associated with this agreement as a line item “*HLNR (PEO) 6.5% of Revenue.*” [Sources: Application, Appendix D, and May 28, 2021, screening response, pdf16]

HLH provided a Draft Medical Consultant Agreement for its Medical Director, Kirsten Marie Winn Carr, MD. The draft agreement identifies the roles and responsibilities of both the home health agency and its medical director. Since it is a draft agreement, HLH provided an attestation signed by both entities of the agreement agreeing to execute the agreement upon “...*successful passage of the Certificate of Need for King County...*” HLH additionally included all costs associated with this agreement in its the projected revenue and expense statements, identified as a line item “*Consulting Fees (Medical Director).*” [Sources: Application, Appendix E, March 26, 2021, screening response, pdf pp20-22, and May 28, 2021, screening response, pdf16]

The department also reviewed the projected balance sheets of HLH. As previously stated, the purpose of the balance sheet is to review the financial status of the home health agency at a specific point in time. Both sets of balance sheets show what each entity owns (assets) and how much it owes (liabilities), as well as the amount invested in the business (equity). Table 19 summarizes the projected balance sheets provided by the applicant. Projected balance sheets provided in the review show the agency expects to balance assets and liabilities through the projection period.

After reviewing the information provided by the applicant, the department concludes that a condition is necessary to ensure the draft Medical Consultant Agreement is executed as described in the application. Based on the information provided by the applicant and in public comment, the department concludes that the HLH project, with written agreement to the condition in the conclusion section of this evaluation, **meets this sub-criterion.**

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

WAC 246-310-220(2) 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 directs 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 each proposed project’s costs with those previously considered by the department.

Wellspring Home Health Center, LLC dba Wellspring Home Health Center

Wellspring anticipates an estimated capital expenditure of \$25,000 for expanding its current services to include Medicare and Medicaid-certified home health services to the residents of King County. Since this project proposes to set up an office in an existing facility the costs are for tenant improvements, office furniture, movable office equipment, and applicable sales tax. There are no construction costs required for this project. Wellspring provided the following statements on these costs and lack of construction.

“*Wellspring developed the capital expenditure estimates in Table 1 based on its experience operating home health services in Alaska and developing its operations here in Washington State.*” [Source: Application, p20]

“*No construction is necessary;*” [Source: Application, p31]

Wellspring provided the following statements related to the capital and operating costs, and lack of impact on costs and charges for health services.

“The capital and equipment expenditures detailed in Table 1 reflect the capital required to become Medicare certified and Medicaid eligible and handle the expected increases in utilization therefrom. The \$25,000 in capital and equipment expenditures represents a small expense relative to Wellspring Home Health Center’s reserves, from which the proposed project will be funded. Furthermore, in most cases Wellspring does not set its rates. They are based on fee schedules with CMS and principal payers. Thus, the proposed project will not impact costs or charges for health services.” [Source: Application, pp20-21]

“The costs of operation until Medicare reimbursement will be covered by Wellspring Home Health Center’s reserves. See the Balance Sheet demonstrating sufficient reserves in Exhibit 10A.” [Source: Application, p24]

Wellspring provided the following statement and tables on anticipated costs and charges per visit. [Source: Application, pp23-24]

“The Pierce County Wellspring Home Health Center has been licensed since November 2019, however it has yet to serve any patients.”

Applicant’s Tables

Table 10: Average Cost and Charge Per Visit by Discipline Category		
	Cost Per Visit	Charge Per Visit
Skilled Nursing	\$183	\$243
Physical Therapy	\$156	\$207
Occupational Therapy	\$160	\$213
Speech Pathology	\$182	\$242
Medical Social Services	\$171	\$228
Home Health Aid	\$93	\$124
Source: Applicant calculations of Washington benchmarks.		

Table 11: Total Cost and Charge by Payer, Year 3 (2024)		
	Costs	Charges
Medicare	\$1,384,281	\$1,841,213
Medicaid	\$107,866	\$143,471
Commercial/Other	\$305,620	\$406,502
Source: Applicant calculations of Washington benchmarks.		

When questioned about “Washington benchmarks” referenced here and in other parts of the application, Wellspring provided the following response. [Source: March 26, 2021, screening response, pp6-7]

“Because there have been no patients treated at our Washington location (except the few patients treated pro-bono as referenced in screening response #4 above) and recognizing that the Alaska operations are not representative of what would be expected for Washington, the projections are based on Washington benchmarks based on public documents for other home health projects similar to Wellspring's proposed project.

The Washington benchmarks are based on review of the following certificate of need approved Washington projects:

- + Amicable Healthcare, Inc. - CN App #19-52
- + Providence Home Health - CN App #20-24
- + EmpRes Healthcare Group, Inc (Eden Home Health) - CN App #19-67”

Wellspring also provided the following statements on potential negative impacts and consequences of unmet home health needs, which includes costs to the system. [Source: Application, p14]

“If there is not sufficient capacity in the planning area, then King County residents will not have timely access to home health services, which will result in poorer quality, lower outcomes, and a reduced patient experience as patients may delay or forgo receiving the necessary skilled services. Further, without sufficient access to home health agencies, this can also lead to increased costs due to preventable emergency room visits or hospitalizations and patients having to receive care at more expensive alternatives.”

Public Comments

None

Rebuttal Comments

None

Department Evaluation

Given that the only tenant improvements, office furniture, and movable office equipment are needed to expand the agency’s service area, the relatively low estimated capital expenditure is reasonable. Wellspring provided a projected payer mix for this project and a sound rationale for the basis of these figures and how they could be applicable to an agency serving King County summarized in the following table. [Sources: Application, p23 and March 26, 2021, screening response, p6]

Department’s Table 20
Wellspring’s Projected Payer Mix as a Percent of Gross Revenue for Projection Years

Source	CY 2022	CY 2023	CY 2024
Medicare	77%	77%	77%
Medicaid	6%	6%	6%
Commercial/Other	17%	17%	17%

This anticipated payer mix is based on regional rates Wellspring justified as applicable to this project. The estimated capital expenditure is based on Wellspring’s experience operating home health agencies in Alaska.

Wellspring states that although there is an expected capital expenditure for this project, these costs are small relative to the reserves of the applicant; and that in most cases fee schedules are not set by the applicant, but by payers. Further, Wellspring states that access to home health services, as this project proposes, can decrease the need for more expensive services, such as emergency room visits and hospitalizations. The department does not expect an unreasonable impact on costs and charges for healthcare services in King County as a result of this project. Wellspring’s project **meets this sub-criterion.**

HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC

HLH anticipates an estimated capital expenditure of \$9,828 to establish a new Medicare and Medicaid-certified home health agency to serve the residents of King County. Since this project proposes to set up an office in an existing facility the costs are for office furniture, movable office equipment, and applicable sales tax. There are no construction costs required for this project.

HLH provided the following statements related to this sub-criterion and on these costs and lack of construction.

“Medicare and Medicaid Home Health rates are established independent of King County’s Home Health supply and demand. As such the project would not impact the costs and charges for these healthcare services.

This project does not include any construction costs and will not materially affect any costs and charges for healthcare services in the planning area.” [Source: Application, p47]

Public Comments

None

Rebuttal Comments

None

Department Evaluation

Given that the only office furniture and movable office equipment are needed to establish this new home health agency, the relatively low estimated capital expenditure is reasonable.

HLH provided a projected payer mix for this project and a sound rationale for the basis of these figures and how they could be applicable to an agency serving King County summarized in the following table. [Source: Application, p47]

Department’s Table 21
HLH’s Projected Payer Mix as a Percent of Gross Revenue for Projection Years

Source	CY 2022	CY 2023	CY 2024
Medicare	78%	78%	78%
Medicaid	5%	5%	5%
HMO	11%	11%	11%
Private Pay	1%	1%	1%
Commercial/Government/L&I	4%	4%	4%

This anticipated payer mix is based on regional rates of HLH affiliates justified as applicable to this project.

HLH states that although there is an expected capital expenditure for this project, these costs do not include construction and that rates are established independent of King County’s supply and demand. The department does not expect an unreasonable impact on costs and charges for healthcare services in King County as a result of this project. HLH’s project **meets this sub-criterion**.

(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 directs 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.

Wellspring Home Health Center, LLC dba Wellspring Home Health Center

Wellspring provided the following statements related to this sub-criterion.

“The \$25,000 in capital and equipment expenditures represents a small expense relative to Wellspring Home Health Center’s reserves, from which the proposed project will be funded. Records of historical financials and balance sheets, provided in Exhibit 10A, demonstrate sufficient reserves for the proposed project.

Wellspring’s historical balance sheets demonstrate sufficient reserves for the proposed project. A letter of financial commitment from Wellspring’s owner is attached as Exhibit 11.

Since Wellspring’s reserves are sufficient to fund the proposed project, and Wellspring does not have other concurrent projects which might otherwise compete for funds, this represents the most cost-effective method of financing. Other methods of financing carry financing costs, which funding through reserves avoids.” [Source: Application, p22]

“It is our understanding the Department requests audited financial statements to assess the ability of the applicant to fund the proposed project. With that in mind, we have attached a letter from Key Bank attesting to the availability of the \$25,000 necessary for the capital expenditures of the proposed project. In addition, although Wellspring does not anticipate its need, this letter identifies Wellspring’s revolving credit line of \$100,000 which would be available in the case of cash-flow need. Please see new Exhibit 16 for a copy of this attestation letter from Key Bank.” [Source: March 26, 2021, screening response, p13]

Public Comments

None

Rebuttal Comments

None

Department Evaluation

Wellspring provided a reasonable explanation of its modest estimated capital costs; and the project has no construction costs. All capital costs are attributed to tenant improvements, office furniture, movable office equipment, and applicable sales tax.

Wellspring intends to fund its project using existing cash reserves. Wellspring provided a letter of financial commitment signed by its Administrator, Joyce Ibanga. The letter is dated November 25, 2020 and states *“Wellspring Home Health Center, LLC's is pleased to commit to fund the estimated capital expenditures and other costs of operations associated with the project. Wellspring Home Health Center, LLC has sufficient cash reserves to fully fund the intended project.”* [Source: Application, Exhibit 11]

Since Wellspring does not have audited financial statements it instead provided historical financial statements including its Alaska operations, for years 2017 through 2020. This includes its income statements and balance sheets. Additionally, Wellspring provided a letter signed by Sue Meyerderk, Key Bank, Lakewood Branch Manager, dated February 2, 2021, attesting that Wellspring has capital funds and credit to sufficiently cover the estimated capital cost of this project. [Source: March 26, 2021, Exhibit 16]

After reviewing the estimated capital costs and the financial statements provided, the department concludes that a condition is necessary to ensure the project would be financed as described in the application. The department concludes that the Wellspring project, with written agreement to the condition in the conclusion section of this evaluation, **meets this sub-criterion.**

HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC

HLH provided the following statements related to this sub-criterion.

“Healthy Living Network is responsible for all start-up costs.” [Source: Application, p47]

“Healthy Living Network is the financial source who will fund the project as needed.” [Source: Application, p49]

“The funding of the organization will be made 100% by HLH Capricorn Holdings, LLC (see attached letter). HLH Capricorn Holdings LLC audited financials have previously been provided. VistaRiver Healthcare Solutions, Inc is a class B member participating holding company and will not be a funding source for this venture.” [Source: March 26, 2021, screening response, pdf23]

“HLH Capricorn Holdings represented by Healthy Living Network Resources (Healthy Living Network) will fund 100% of this project.” [Source: March 26, 2021, screening response, pdf30]

Public Comments

None

Rebuttal Comments

None

Department Evaluation

HLH provided a reasonable explanation of its modest estimated capital costs; and the project has no construction costs. All capital costs are attributed to office furniture, movable office equipment, and applicable sales tax

HLH intends to fund its project using existing cash reserves; and provided a letter of financial commitment signed by its President, Caroline Breeding, and its Chief Operating Officer, John Cullen. The letter is dated March 10, 2021 and states in part *“We, the governing board of Healthy Living Network (representing Healthy Living Network Resources and HLH Capricorn Holdings, LLC), will commit the necessary personnel, capital investment, and financial resources needed to startup and operate Healthy Living at Home – Seattle, LLC. HLH Capricorn Holdings, LLC will fund this startup; audited financials have been provided.”* [Source: March 26, 2021, screening response, pdf24]

After reviewing the estimated capital costs and the financial statements provided, the department concludes that a condition is necessary to ensure the project would be financed as described in the application. The department concludes that the HLH project, with written agreement to the condition in the conclusion section of this evaluation, **meets this sub-criterion.**

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

Wellspring Home Health Center, LLC dba Wellspring Home Health Center

Based on the source information reviewed and agreement to the conditions identified in the conclusion section of this evaluation, the department determines that Wellspring Home Health Center project **meets** the applicable structure and process of care criteria in WAC 246-310-230.

HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC

Based on the source information reviewed and agreement to the conditions identified in the conclusion section of this evaluation, the department determines that the Healthy Living at Home – Seattle, LLC 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.

WAC 246-310-230(1) 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 directs what specific 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 concludes that the planning area would allow for the required coverage.

Wellspring Home Health Center, LLC dba Wellspring Home Health Center

As stated earlier in this evaluation, Wellspring currently operates in-home services agencies in Alaska and was recently licensed in Washington State. With this project Wellspring would provide Medicare and Medicaid-certified home health services in King County from a location in Pierce County. Wellspring provided a table showing its proposed staffing. This information is summarized in the following table. [Source: March 26, 2021, screening response p9]

Department's Table 22
Wellspring's Proposed FTEs for Years 2022 through 2024

Type of Staff	CY 2022	CY 2023	CY 2024
Nursing	3.40	4.11	4.86
Physical Therapy	2.53	3.06	3.62
Occupational Therapy	0.83	1.00	1.18
Speech Therapy	0.14	0.17	0.20
Medical Social Worker	0.07	0.09	0.10
Home Health Aide	0.65	0.78	0.93
Manager/Administrator	1.00	1.00	1.00
Director of Nursing and Clinical Services	1.00	1.00	1.00
Business/Clerical	2.50	2.50	3.00
Total	12.12	13.71	15.89

Wellspring's medical director is under contract and is not included in the preceding table. [Sources: Application, p7 and March 26, 2021, screening response p9]

Wellspring also provided a breakdown of anticipated ratios for clinical staffing positions as well as the assumption on which they are based.

Applicant's Table

Table 13: Staff to Visit Ratio by Occupational Category	
Type of Staff	Staff / Visit Ratio
Skilled Nursing (RN & LPN)	1.01 FTE per 1,000 Visits
Physical Therapist	0.86 FTE per 1,000 Visits
Occupational Therapist	0.82 FTE per 1,000 Visits
Medical Social Worker	0.84 FTE per 1,000 Visits
Speech Therapist	0.86 FTE per 1,000 Visits
Home Health Aide	0.77 FTE per 1,000 Visits
Other (list)	N/A
Total	0.906 FTE per 1,000 Visits
Source: Applicant	

[Source: Application, p25]

“The staff to visit ratios were constructed based on Washington Benchmarks estimated from based on public documents for other home projects similar to Wellspring’s proposed project.” [Source: Application, p26]

When questioned about “Washington benchmarks” referenced here and in other parts of the application, Wellspring provided the following response. [Source: March 26, 2021, screening response, pp6-7]

“Because there have been no patients treated at our Washington location (except the few patients treated pro-bono as referenced in screening response #4 above) and recognizing that the Alaska operations are not representative of what would be expected for Washington, the projections are based on Washington benchmarks based on public documents for other home health projects similar to Wellspring's proposed project.

The Washington benchmarks are based on review of the following certificate of need approved Washington projects:

- + Amicable Healthcare, Inc. - CN App #19-52
- + Providence Home Health - CN App #20-24
- + EmpRes Healthcare Group, Inc (Eden Home Health) - CN App #19-67”

Wellspring provided the following statements and tables related to this sub-criterion. [Source: Application, p28]

“Wellspring Home Health has operated a Medicare and Medicaid certified home health agency in Alaska since 2017. Please see Exhibit 14 for the resumes of its key personnel.”

Wellspring provided the following additional statements related to the availability of sufficient qualified staff.

“Table 12 provides the number of proposed FTEs, by type. By virtue of our geographic location, Wellspring Home Health anticipate recruiting additional staff from King County and Pierce County. To be effective in staff recruitment and retention, Wellspring Home Health offers competitive wage and benefit packages. Wellspring Home Health operates a Medicare and Medicaid certified home health agency in Alaska and will use similar methods (Zip Recruiter, Glassdoor, workforce, etc.) to recruit and retain qualified staff for its proposed project.

For the above reasons, Wellspring Home Health believes that we will be successful in recruiting additional qualified, core staff to provide and promote quality of care.” [Source: Application, p26]

“Wellspring Home Health does not anticipate any barriers to recruiting staff, however if such barriers arise, Wellspring is prepared with its existing relationships with the medical staffing agencies Marvel Medical Staffing and Core Medical Group. Both organizations support Wellspring’s operations in Alaska and have been informed and are prepared to provide the same support should the proposed project be approved.” [Source: March 26, 2021, screening response, p9]

When asked to further explain how it’s geographic location will help with recruiting additional staff, Wellspring provided the following response. [Source: March 26, 2021, screening response, p7]

“Wellspring’s office located in Lakewood, WA is in Pierce County, but is near the southern border of King County. Given its location near the King County border, Wellspring Home Health anticipates being able to take advantage of the pools of healthcare workers in both the King County and Pierce County markets, two of the biggest healthcare markets in Washington State.

Furthermore, Lakewood, WA, with its location in Pierce County, offers both a lower cost of living and lower sales tax rate relative to comparable areas in King County. These advantages would apply to any home health agency located in Lakewood.”

Public Comments

None

Rebuttal Comments

None

Department Evaluation

Wellspring is currently licensed by the Washington State Department of Health to provide home health services⁹ in King, Pierce, and Thurston counties. Under this license, Wellspring provides home health services to only private pay residents of the three counties. Additionally, Wellspring is currently licensed in the State of Alaska to provide home health services from two locations.¹⁰ As a current healthcare provider, Wellspring has a general understanding of the appropriate staffing necessary to establish Medicare and Medicaid home health services. Using both this general understanding and research it conducted of Medicare and Medicaid-certified Washington providers, Wellspring provided the number of anticipated FTEs to serve King County. Wellspring expects to have a total staff of approximately 16 full-time employees by its third full year of operation.

Wellspring anticipates its location in adjacent Pierce County will be advantageous to its recruitment efforts as it will be able to draw from both Pierce and King counties for its employees. Additionally, Wellspring will use for employee recruitment and retention methods similar to those of its Alaska locations which are proven to be successful. These include competitive wage and benefit packages and online recruitment resources. In the case that Wellspring’s proposed operations face barriers to recruitment it will use its existing relationships with medical staffing agencies to fill vacancies.

⁹ IHS.FS.61055973

¹⁰ The two Alaska locations are federally licensed under CMS certification number 027036 [Source: May 19, 2021, screening response, p2]

Wellspring also identified a projected staffing ratio that is based on its sourced research of Medicare and Medicaid-certified Washington providers. These ratios are reasonable and consistent with data provided in past home health applications reviewed by the program. The applicant identified a contracted medical director and provided an executed medical director agreement. Additionally, the pro forma identifies all costs associated with this staffing plan.

Based on the above information, the department concludes that Wellspring has the ability and expertise to recruit and retain a sufficient supply of qualified staff for this project. **This sub-criterion is met.**

HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC

As stated earlier in this evaluation, HLH currently has affiliate in-home services agencies in Arizona, California, Nevada, Oregon, Utah, and Washington. With this project HLH would operate its Medicare and Medicaid-certified home health agency office from a location in King County. HLH provided a table showing its proposed staffing. This information is summarized in the following table. [Source: March 26, 2021, screening response pdf25-26]

Department's Table 23
HLH's Proposed FTEs for Years 2022 through 2024

Type of Staff	CY 2022	CY 2023	CY 2024
Nursing	2.10	4.80	6.90
Physical Therapy	2.60	5.80	8.70
Occupational Therapy	0.90	2.00	3.00
Speech Therapy	0.20	0.40	0.50
Medical Social Worker	0.20	0.40	0.50
Home Health Aide	0.10	0.20	0.30
Director of Patient Care Services	1.00	1.00	1.00
Assistant Director of Clinical Services	0.00	1.00	1.00
Clinical Supervisor	0.00	0.60	1.90
Intake/Scheduling	1.00	1.00	2.00
Administrative Asst/Reception	0.00	1.00	1.00
Non-Clinical Case Manager	0.00	1.00	1.00
Area Director	1.90	3.30	4.00
Total	10.00	22.50	31.80

HLH's medical direct will be under contract and is not included in the preceding table. [Sources: Application, p55 and March 26, 2021, screening response pdf19]

HLH also provided a breakdown of anticipated ratios for clinical staffing positions as well as the assumption on which they are based.

Applicant's Table

Type of Staff	Staff / Visit Ratio per day
Skilled Nursing (RN & LPN)	4.5
Physical Therapist	4.5
Occupational Therapist	4.5
Medical Social Worker	4.0
Speech Therapist	4.0
Home Health Aide	6.0

[Source: Application, p56]

“The projected staffing is adequate for the number of patients and visits projected based on the experience of the applicant. The applicant’s projected staffing also aligns with the last five (5) Certificate of Need staffing ratios submitted for the area. Additionally, we have increased the number of FTEs needed to account for poor productivity, staff turnover, vacation, sick, etc.” [Source: Application, p56]

HLH provided the following additional statements related to its methods for staff recruitment and retention as well as the availability of sufficient qualified staff.

“Healthy Living Network has a dedicated recruitment department whose responsibility is to manage the entire recruitment process end to end. This includes advertising, marketing, interviewing, screening and hiring candidates. The recruitment department has many advanced resources to leverage in finding candidates for a given geographic area. Additionally, they collaborate with other healthcare professionals, facilities and providers to source candidates.

Healthy Living Network has clinical staff interested in relocating to King County once it is approved and operational.

Between the dedicated recruitment team and interested clinical staff, the applicant has confidence in providing enough staff to support the project through internal and external healthcare professionals.” [Source: Application, p57]

“HLH Seattle will use a sophisticated proprietary scheduling and patient placement software system to ensure that any patient accepted for services has all applicable disciplines available to them. As part of our Intake review process, we will ensure that we only accept patients for whom we have available disciplines within the allotted 24 - 48 hour admission time frame. This also includes any added discipline through the course of care. In the rare event that we cannot cover an added discipline, we will work the patient, responsible parties, MDs, etc. to ensure the patient is placed with another provider that is able to cover what is needed.” [Source: March 26, 2021, screening response, pdf16]

When questioned about relocating staff from other areas, HLH provided the following clarification. [Source: March 26, 2021, screening response, pdf16]

“Yes, these individuals will be relocating to WA State from other States and areas with less staffing shortages. These individuals have expressed an interest and desire to relocate to the Seattle area to assist us with this start up and bless the community as a whole.”

Public Comments

None

Rebuttal Comments

None

Department Evaluation

Since mid-2018 a HLH affiliated agency has been licensed by the Washington State Department of Health to provide home health services in Clark County.¹¹ HLH based its projected staff and staffing ratio for the new agency's King County services on the experience of its affiliates in another urban center within Washington State as well as other King County provider staffing benchmarks. HLH provided the number of anticipated FTEs to serve King County residents, expecting to have a total of approximately 32 FTEs by year three.

Additionally, HLH also has an affiliate that manages all aspects of recruitment, as well as known sources of staffing currently interested in relocating to Washington State and King County. HLH will use its affiliates' proven strategies when facing barriers to staffing such as checks and balances in the intake process making sure there is enough staff of a discipline to provide needed services.

The applicant identified a contracted medical director and provided an executed medical director agreement. Additionally, the pro forma identifies all costs associated with this staffing plan.

Based on the above information, the department concludes that HLH has the ability and expertise to recruit and retain a sufficient supply of qualified staff for this project. **This sub-criterion is met.**

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

WAC 246-310-230(2) 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 each applicant's ability to establish and maintain appropriate relationships.

Wellspring Home Health Center, LLC dba Wellspring Home Health Center

Wellspring provided the following statements and tables related to this sub-criterion.

"Wellspring Home Health has operated a Medicare and Medicaid certified home health agency in Alaska since 2017. Please see Exhibit 14 for the resumes of its key personnel." [Source: Application, p28]

"Wellspring Home Health is currently developing its relationship with ancillary and support services in Washington State. It has experience developing similar relationships with medical supply companies, office supply companies, temporary staff agencies, accounting firms, legal firms, etc. for its Alaska operations." [Source: Application, p27]

¹¹ IHS.FS.60814521

“Wellspring anticipates leveraging its existing relationships with medical supply and other vendors to support the proposed Lakewood agency. These include Henry Schein, Medline, Hopkins Medical Products, and SO-LOW Environmental Equipment,” [Source: March 26, 2021, screening response, pp7-8]

“Wellspring Home Health does not anticipate any barriers to recruiting staff, however if such barriers arise, Wellspring is prepared with its existing relationships with the medical staffing agencies Marvel Medical Staffing and Core Medical Group. Both organizations support Wellspring’s operations in Alaska and have been informed and are prepared to provide the same support should the proposed project be approved.” [Source: March 26, 2021, screening response, p9]

Additionally, Wellspring provided the following information regarding patients’ access to services. [Source: Application, p26]

“The Wellspring Lakewood office will be open from 9:00am – 5:00pm, Monday through Friday. We will have staff on call 24 hours to assist with any patient needs.”

Public Comments

None

Rebuttal Comments

None

Department Evaluation

Since 2017 Wellspring has been providing Medicare and Medicaid-certified in-home services in Alaska State. For this project, Wellspring proposes to serve Medicare and Medicaid patients residing in King County from its facility in Lakewood, within adjacent Pierce County. Wellspring is currently developing relationships with potential ancillary and support vendors in King County, a task which it has successfully undertaken at its Alaska operations. Additionally, Wellspring will leverage any existing relationships which are also available for King County operations.

Wellspring also stated that although its offices will maintain typical business hours, services will be available with an on-call staff person all hours and days.

Information provided in the application demonstrates that the applicant has the ability and expertise to establish any new relationships necessary for the King County services. Based on the information reviewed, the department concludes Wellspring **meets this sub-criterion**.

HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC

HLH provided the following lists and statement related to this sub-criterion.

Applicant's Listing of Ancillary and Support Services

Comcast - Internet
Fazzi - Coding
Stericycle - Medical Waste
Medline - Medical Supplies
WellSky Kinser - Electronic Medical Record
Telelanguage - Interpretive services
Strategic Healthcare Programs - Internal Qualitative Data and Reporting and Internal Scorecard / Scrubbing
DSS Research - 3rd party Qualitative Data reporting to CMS
Quest Diagnostic - Lab Services
Healthy Living Network - Payroll, AP, HR, Legal, Recruiting, Consultation Services
Medical Director - Kiersten Carr M.D.
Trust Alvin - OIG Search and State License Verification Check
Cortex - patient callback, patient satisfaction, employee satisfaction
Amazon - Office supplies
Relias - Learning Management System

[Source: Application, p58]

Additionally, HLH provided the following information regarding patients' access to services.
[Source: Application, p57]

"Agency office hours are from 8:30 AM to 5:00 PM Monday through Friday. Healthy Living at Home - Seattle, LLC will have an RN and office representative on call 24 hours per day 7 days per week 365 days per year allowing patients to access services outside of normal office hours."

Public Comments

None

Rebuttal Comments

None

Department Evaluation

HLH affiliates have been providing Medicare and Medicaid-certified in-home services in seven western states including Washington State; and proposes to serve Medicare and Medicaid patients residing in King County from its facility in Renton, within King County. HLH provided a list of ancillary and support vendors for its King County operations.

HLH also stated that although its offices will maintain typical business hours, services will be available with an on-call staff person all hours and days.

Information provided in the application demonstrates that the applicant has the ability and expertise to establish any new relationships necessary for the King County services. Based on the information reviewed, the department concludes HLH **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.*

WAC 246-310-230(3) 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 each applicant's history in meeting these standards at other facilities owned or operated by each 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.¹² 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 2018 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.¹³

- 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 it may be 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.

Wellspring Home Health Center, LLC dba Wellspring Home Health Center

Wellspring provided the following statements related to this sub-criterion.

"Wellspring Home Health Center has no history with respect to criminal convictions, denial or revocation of a license to practice a health profession, or decertification as a provider of services in the Medicare or Medicaid program." [Source: Application, 27]

"Wellspring Home Health Center in Pierce County is not an existing CMS certified home health agency. Please see Exhibit 15A for the CMS home health agency survey activity report for Wellspring's Alaska agency available on CMS' Certification & Oversight Reports (QCOR) website. The last survey was on 05/17/2017 and showed no deficiencies were found."

¹² WAC 246-310-230(5).

¹³ Definitions of standard and condition level surveys: <https://www.compass-clinical.com/deciphering-tjc-condition-level-findings/>

Attached in Exhibit 15B is Wellspring Home Health’s accreditation letter and certificate from Community Health Accreditation Partner (CHAP).” [Source: Application, p28]

“On page six of our application, we list three facilities owned or operated by Wellspring Home Health. These include the two Alaska facilities in Wasilla and Anchorage, and the Lakewood, WA facility. The two Alaska facilities operate under the CMS certification number 027036. The Lakewood, WA facility is not currently CMS certified. Obtaining CMS certification for our Lakewood, WA facility is the motivation of our application.” [Source: May 19, 2021, screening response, p2]

Wellspring also provided its in-service staff training materials; which includes study materials, sample tests, test keys, and completion certificates. [Source: Application, Exhibit 12]

Public Comment

None

Rebuttal Comments

None

Department Evaluation

As stated in the applicant descriptions section of this evaluation, Wellspring Home Health Center, LLC dba Wellspring Home Health Center is one of the applicants. As of the writing of this evaluation, this applicant operates in-home services agencies in Alaska and Washington states.

Conformance with Medicare and Medicaid Standards

Using the CMS Quality, Certification & Oversight Reports (QCOR) website, the department reviewed the historical survey information for Wellspring’s in-home services agencies.¹⁴ The following table shows the total number of agencies by state and the number of surveys reported on the QCOR website from year 2018 through current.¹⁵

Department’s Table 24
Wellspring’s In-Home Services Agencies

State	# of Operational Agencies	QCOR Surveys Home Health	# of Standard Level Findings	# of Condition Level Findings
Alaska	2	0	0	0
Washington	1	0	0	0
Totals	3	0	0	0

As shown in the preceding table, from year 2018 through current, CMS did not conduct any surveys for the applicant’s existing in-home services agencies.

Terminated Provider Counts Report

Focusing on years 2018 through current, there is no evidence that any Wellspring-affiliated agencies were involuntarily terminated from participation in Medicare reimbursement. The department

¹⁴ ‘In home service agencies’ are home care agencies, home health agencies, and hospice agencies.

¹⁵ ‘Current’ in this section, is through August 22, 2021

concludes that all Wellspring-affiliated agencies are substantially compliant with state licensure and Medicare conditions of participation. [Source: CMS Quality, Certification, and Oversight Reports, as of August 22, 2021]

Wellspring provided the name and professional license number for its Medical Director, Amar Kapur, M.D.¹⁶ Using data from the Washington State Medical Quality Assurance Commission the department confirmed that Dr. Kapur has an active license with no enforcement action in Washington State.

Wellspring also identified its key staff members including its Director of Clinical Services and Nursing, Carol Schneer¹⁷ and an Occupational Therapist, Tara Sperry.¹⁸ Carol Schneer has an active license with no enforcement. Tara Sperry has an active license with conditions related to past enforcement¹⁹ alleged as related to inconsistencies in charted and billed therapy sessions. These allegations are not related to an agency's capacity to furnish quality care, nor are likely to jeopardize or adversely affect the health or safety of patients. Additionally, past billing practices of an agency's employee is out of the scope of this sub-criterion's review.

Although there is no recent compliance history of Wellspring or its affiliates, lack of history does not equate to lack of or sufficient quality. To prove its commitment to quality services Wellspring provided evidence of CHAP full accreditation for three years beginning in year 2020.

Additionally, Wellspring provided the credential information for the agency's Medical Director and its current staff. Based on these facts, there is reasonable assurance the agency's service area expansion would be operated in conformance with applicable state and federal licensing and certification requirements.

However, since only a portion of the agency's staff have been identified, a condition is necessary to ensure Wellspring's commitment to qualified, credentialed staff is met. The department concludes that the Wellspring project, with written agreement to the condition in the conclusion section of this evaluation, **meets this sub-criterion.**

HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC

HLH provided the following statements related to this sub-criterion. [Source: Application, p56]

“Kirsten Marie Winn Carr, MD, will serve as a contracted Medical Director for Healthy Living at Home – Seattle, LLC. Dr. Carr is a board certified internal medicine doctor. Her license number is MD60672461. Dr. Carr’s resume, Washington DOH Provider Credential Search PDF and Medical Director Agreement is attached as Appendix E, F, and G.”

In response to a question asking about the criminal conviction, license, and certification histories of those affiliated with this project, HLH provided the following response.

“N/A - none of these apply.” [Source: Application, p58]

“N/A - Per the Department of Health’s evaluation for CoN 20-02, the applicant met this sub-criterion (see following page screenshots).” [Source: Application, p60]

¹⁶ OP61134689

¹⁷ RN61004740

¹⁸ OT60096143

¹⁹ M2016-500 and M2016-1026

“N/A - the applicant does not have a history of condition-level findings.” [Source: Application, p62]

Public Comments

None

Rebuttal Comments

None

Department Evaluation

As stated in the applicant descriptions section of this evaluation, HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC is one of the applicants. As of the writing of this evaluation, this applicant operates in-home service agencies in seven states, including, Arizona, California, Idaho, Nevada, Oregon, Utah, and Washington.

Conformance with Medicare and Medicaid Standards

Using the CMS Quality, Certification & Oversight Reports (QCOR) website, the department reviewed the historical survey information for HLH’s in-home services agencies.²⁰ The following table shows the total number of agencies by state and the number of surveys reported on the QCOR website from year 2018 through current.²¹

Department’s Table 25
HLH’s In-Home Services Agencies

State	# of Operational Agencies	QCOR Surveys Home Health & Hospice	# of Standard Level Findings	# of Condition Level Findings
Arizona	2	1	0	0
California	22	26	15	1
Idaho	3	3	0	0
Nevada	2	2	1	0
Oregon	3	1	2	0
Utah	1	4	4	0
Washington	2	1	0	0
Totals	35	38	22	1

As shown in the preceding table, from year 2018 through current, CMS has conducted a total of 38 surveys for the applicant’s existing in-home services agency. Of the 35 agencies, 13 were not surveyed in the timeframe. Of the 38 surveys, only 22 standard level findings were noted, and only one condition level finding. [Source: CMS Quality, Certification, and Oversight Reports, as of August 22, 2021]

Terminated Provider Counts Report

Focusing on years 2018 through current, there is no evidence that any HLH-affiliated agencies were involuntarily terminated from participation in Medicare reimbursement. The department concludes that all HLH-affiliated agencies are substantially compliant with state licensure and Medicare

²⁰ ‘In home service agencies’ are home care agencies, home health agencies, and hospice agencies.

²¹ ‘Current’ in this section, is through August 22, 2021

conditions of participation. [Source: CMS Quality, Certification, and Oversight Reports, as of August 22, 2021]

HLH provided the name and professional license number for its proposed Medical Director, Kirsten Marie Winn Carr, M.D.²² Using data from the Washington State Medical Quality Assurance Commission the department confirmed that Dr. Carr has an active license with no enforcement action in Washington State. Key staff identified in this application are: Director of Patient Care Services, Kathryn Cikler-Swett²³ and Clinical Director, Ashley Nicole Davis.²⁴ Both of which have active licenses with no enforcement action in Washington State.

Given the compliance history of the agencies affiliated with HLH, as well as that of the agency's proposed Medical Director and key staff, there is reasonable assurance the home health agency would be operated in conformance with applicable state and federal licensing and certification requirements. However, a condition is necessary to ensure the agency's commitment to qualified staff is met. The department concludes that the HLH project, with written agreement to the condition in the conclusion section of this evaluation, **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.

WAC 246-310-230(4) 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 directs 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 each application.

Wellspring Home Health Center, LLC dba Wellspring Home Health Center

Wellspring provided the following statements related to this sub criterion.

"There is significant unmet need for home health services currently in the King County, as demonstrated by the Department's numeric need methodology for home health services. Wellspring Home Health's proposed project will help to address part of this net need and provided desperately needed capacity in the planning area to ensure King County residents will have continued access to home health services. Thus, the proposed will not result in unwarranted fragmentation.

Wellspring Home Health is currently developing its working relationship with other healthcare providers in Washington State. It has experience developing similar relationships with hospitals, nursing homes, and other health service providers for its Alaska operations." [Source: Application, p27]

"In addition, Wellspring has been in contact with or targeted a series of organizations for sources of referrals. These organizations and their addresses are listed in Table 3." [Source: March 26, 2021, screening response, p8]

²² MD60672461

²³ RN60698951

²⁴ RN60925866

Applicant's Listing of Potential Referrals

Table 3: List of Potential Referral Organizations	
Referral Source	Address
Medigan Army Medical Center	9040 Jackson Ave, Tacoma, WA 98431
HCR Manor Care	4524 Intelco Lp SE, Lacey, WA 98503
Dr. In Kwon Park Clinic	8730 S. Tacoma Way, #104 Lakewood
Tacoma Nursing & Rehab	2102 S 96th Street, Tacoma WA 98444
MultiCare Clinic	400 15th Av. Puyallup, WA 98372
Puyallup Nursing & Rehab	516 23rd Ave SE, Puyallup, WA
American Lake VA Hospital	9600 Veteran Dr. SW Tacoma, WA
Capital Medical Center	3900 Capital Mall Dr. SW Olympia, WA
Swedish Hospital -First Hill East	747 Broadway, Seattle, WA
Carolyn Downs Family Ctr.	2101 E Yesler Way, Seattle, WA
Immediate Clinic	1560 NE 8th St A-4, Bellevue
Overlake Medical Center	1035 11th Ave., NE, Bellevue
Snoqualmie Valley Hospital	9801 Frontier Ave., SE, Snoquaimie
Virginia Mason Hospital	1100 9th Ave., Seattle, WA
U.S. Coast Guard Base Seattle	14 S. Massachusetts St. Seattle, WA
Burien Medical Center Seattle	1440 Ambaum Boulevard SW, Seattle
Swedish Medical Center	5300 Tallman Ave., NW, Seattle, WA
Brookdale Senior Living	2326 California Ave., SW, Seattle, WA 98116
Judson Park Senior Living	23600 Marine View Dr., S. Des Moines, WA
Quail Park Memory Care	4515 41st Ave., SW, Seattle
Seattle Childrens Hospital	4800 Sand Point Way, NE Seattle
Naval Hospital Bremerton	1 Boone Rd., Bremeton, WA
Source: Applicant	

[Source: March 26, 2021, screening response, p8]

Public Comments

The following entities provided comments related to this sub-criterion. Following are excerpts specific to this review sub-criterion.

John Colvin, Treasurer, Thurston County Veteran Services

“By approving an expansion of new Home Health Care Services in King County, these new agencies will help ensure that our veterans and aging communities have better and adequate continuity of Home Health Care services in the comfort of their homes.”

Miguel D. Padilla, President, In Touch “We Care” Support Group

“Home Health services provided by Wellspring Home Health Center; LLC would be an asset to our aging Veterans and military retirees community. By approving additional Home Health care services in King County, the Washington State Department of Health will help ensure that our Veterans communities have access to more and better continuity of care through another agency for Home Health Care services.”

Isabella Colvin, President, Association of the United States Army

“Home Health care provided by Wellspring Home Health Center; LLC would be an asset to our aging Veterans community. By approving additional Home Health services in King County. The Washington State Department of Health will help ensure that our Veterans communities have access to better continuity of care through another source for Home Health Care services.”

Rebuttal Comments

None

Department Evaluation

Information provided in Wellspring's application and supported by public comment, demonstrates that it has the basic infrastructure in place to expand Medicare and Medicaid-certified home health services for King County residents.

For this sub-criterion, the department must also consider the outcome of the financial feasibility section of this review. If a project is denied under WAC 246-310-220(1), (2), or (3), then the project must also be denied under this sub-criterion. This result is based on the department's reasoning that if a project is not deemed financially feasible, the project has the potential to cause unwarranted fragmentation of services in the planning area if approved. Based on the information provided and conclusions in earlier parts of this evaluation, the Wellspring project **meets this sub-criterion**.

HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC

HLH provided the following statements related to this sub criterion.

“Healthy Living at Home - Seattle, LLC has the ability to promote continuity in the provision of health care by ensuring that referred patients receive the appropriate level of care. When a patient is evaluated for home health and is determined to need a different level of care, Healthy Living at Home – Seattle will work cooperatively with the discharging facility, patient, and the patient health care provider to identify the appropriate level and setting for the care needed (i.e. skilled nursing facility, home health, hospice, inpatient rehab, etc). By working with the community (health care providers, acute facilities and others), we can avoid unwarranted fragmentation of services and promote appropriate care for every referral.” [Source: Application, p59]

“Healthy Living at Home - Seattle, LLC will establish formal Business Associate Agreements with the various healthcare providers detailed in our response to question 16. Doing so will ensure that an appropriate relationship is established and followed to safeguard patient information and ensure appropriate care is being provided. Furthermore, the applicant will only provide care to individuals where we have sufficient ancillary support services available.

The Applicant will also participate in hospital and community healthcare based continuing education and coordination meetings. This will result in increased access, coordination, and availability of in home services to patients.” [Source: Application, p60]

“There are a wide array of relationships that will be established once we are approved to serve the residents of King County. At a minimum, we will establish relationships with the following healthcare providers:

- *Hospitals*
 - *Skilled Nursing Facilities*
 - *Assisted Living Facilities*
 - *Independent Living Facilities*
 - *Memory Care Facilities*
 - *Adult Family Homes*
 - *Health Clinics*
 - *Independent M.D.s*
 - *Outpatient and Inpatient Therapy*
 - *Hospice Agencies*
 - *Other Home Health Agencies*
 - *Durable Medical Equipment Providers*
- [Source: Application, p58]

In response to a screening question about establishing referral sources for the new agency, HLH provided the following response. [Source: March 26, 2021, screening response, pdf16]

“Healthy Living at Home has formal agreements with Kaiser in Vancouver, Portland, Salem and Bend to serve as a preferred provider for their Home Health patients. An informal agreement is in place with HLH - Seattle once it is eligible to see patients in King County.

A similar informal agreement is in place with Prestige Care, a provider of skilled nursing and assisted living services in the NorthWest, based on it’s formalized agreements in other markets.

HLH Seattle will continue to work on formalizing these agreements, and others, as the agency launches.”

Public Comments

None

Rebuttal Comments

None

Department Evaluation

Information provided in HLH’s application demonstrates that it has the basic expertise to establish Medicare and Medicaid-certified home health services for King County residents.

For this sub-criterion, the department must also consider the outcome of the financial feasibility section of this review. If a project is denied under WAC 246-310-220(1), (2), or (3), then the project must also be denied under this sub-criterion. This result is based on the department’s reasoning that if a project is not deemed financially feasible, the project has the potential to cause unwarranted fragmentation of services in the planning area if approved. Based on the information provided and conclusions in earlier parts of this evaluation, the HLH project **meets this sub-criterion**.

- (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.*

Wellspring Home Health Center, LLC dba Wellspring Home Health Center
This sub-criterion is addressed in sub-section (3) above and is **met**.

HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC
This sub-criterion is addressed in sub-section (3) above and is **met**.

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

Wellspring Home Health Center, LLC dba Wellspring Home Health Center

Based on the source information reviewed and agreement to the conditions identified in the conclusion section of this evaluation, the department determines that the Wellspring Home Health Center project **meets** the applicable cost containment criteria in WAC 246-310-240.

HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC

Based on the source information reviewed and agreement to the conditions identified in the conclusion section of this evaluation, the department determines that the Healthy Living at Home – Seattle, LLC 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 each application has met the criteria of WAC 246-310-210 thru 230. If either project fails to meet one or more of these criteria then the project cannot be considered to be the best alternative in terms of cost, efficiency, or effectiveness as a result the application would fail this sub-criterion.

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

If there are multiple applications, the department's assessment is to apply any service or facility superiority criteria contained throughout WAC 246-310 and the 1987 State Health Plan related to the specific project type.

Wellspring Home Health Center, LLC dba Wellspring Home Health Center

For this project, Wellspring met the applicable review criteria under WAC 246-310-210, 220, and 230. Therefore, the department moves on to alternatives considered by the applicant. Wellspring considered the several options outlined in the following statement and tables. [Source: Application, pp29-30]

"The following three options were evaluated in the alternatives analysis:

- *Option One: Develop a Medicare/Medicaid Project in Pierce County*
- *Option Two: Develop a Medicare/Medicaid Project in King County—The Project*
- *Option Three: Do Nothing*

Please see Tables 14-18, respectively. They provide a summary of advantages and disadvantages of each of the two options based on the following evaluative criteria: Promoting availability, or access

to healthcare services; Promoting Quality of Care; Promoting Cost and Operating Efficiency; and Legal Restrictions.”

Applicant’s Tables

Table 14. Alternatives Analysis: Promoting Access to Healthcare Services.

Option:	Advantages/Disadvantages:
Option One Develop a Medicare/Medicaid Project in Pierce County	<ul style="list-style-type: none"> Limited need for additional home health agency. (Neutral, “N”)
Option Two Develop a Medicare/Medicaid Project in King County—The Project	<ul style="list-style-type: none"> Significant unmet need for additional home health agency services based on the Department’s numeric need methodology (Advantage, “A”)
Option Three Do nothing	<ul style="list-style-type: none"> Would do nothing to improve access (Disadvantage (“D”)). Without additional capacity, some patients may have to delay or not receive care altogether. (D)

Table 15. Alternatives Analysis: Promoting Quality of Care.

Option:	Advantages/Disadvantages:
Option One Develop a Medicare/Medicaid Project in Pierce County	<ul style="list-style-type: none"> Residents of the Planning Area would have increased home health capacity--this improves quality of care inasmuch as it improves continuity of care. (A)
Option Two Develop a Medicare/Medicaid Project in King County—The Project	<ul style="list-style-type: none"> Residents of the Planning Area would have increased home health capacity--this improves quality of care inasmuch as it improves continuity of care. (A)
Option Three Do nothing	<ul style="list-style-type: none"> Without sufficient access home health, this can also lead to preventable emergency room visits or hospitalizations. (D)

Table 16. Alternatives Analysis: Cost Efficiency and Capital Impacts.

Option:	Advantages/Disadvantages:
Option One Develop a Medicare/Medicaid Project in Pierce County	<ul style="list-style-type: none"> Limited capital expenditures necessary. (A) Improved access prevents unnecessary emergency room and hospitalization visits. (A)
Option Two Develop a Medicare/Medicaid Project in King County—The Project	<ul style="list-style-type: none"> Limited capital expenditures necessary. (A) Improved access prevents unnecessary emergency room and hospitalization visits. (A)
Option Three Do nothing	<ul style="list-style-type: none"> Least costly with respect to capital expenditures. However, lack of sufficient access to home health services leads to increased use of more expensive alternatives (emergency room utilization, hospitalization, etc.). (D)

Table 17. Alternatives Analysis: Staffing Impacts.

Option:	Advantages/Disadvantages:
Option One Develop a Medicare/Medicaid Project in Pierce County	<ul style="list-style-type: none">• Large concentration of skilled health service professionals. (A).• Competitive market in demand for skilled labor. (D).
Option Two Develop a Medicare/Medicaid Project in King County—The Project	<ul style="list-style-type: none">• Large concentration of skilled health service professionals. (A).• Competitive market in demand for skilled labor. (D).
Option Three Do nothing	<ul style="list-style-type: none">• No impact.

Table 18. Alternatives Analysis: Legal Restrictions.

Option:	Advantages/Disadvantages:
Option One Develop a Medicare/Medicaid Project in Pierce County	<ul style="list-style-type: none">• This option requires certificate-of-need approval.• There is uncertainty in how much unmet need exists for additional home health agencies in Pierce County. (D)
Option Two Develop a Medicare/Medicaid Project in King County—The Project	<ul style="list-style-type: none">• This option requires certificate-of-need approval.
Option Three Do nothing	<ul style="list-style-type: none">• There are no legal implications with this option.

When asked to discuss why its project should be considered the best available alternative for King County residents, Wellspring provided the following statements and table. [Source: March 26, 2021, screening response, pp14-15]

“On January 21, 2021, Healthy Living at Home submitted a Certificate of Need application for a new home health agency in King County (CN 21-44), concurrent with the Wellspring application for the same. The Health Living at Home application represents a resubmission of an earlier application which was denied, CN 20-02.

*If the new application by Healthy Living at Home satisfies the Department criteria of Need, Financial Feasibility, Structure and Process of Care, and Cost Containment, then **it is Wellspring’s position that both the Wellspring and Healthy Living applications should be approved.** There currently exists significant need in King County for additional home health services. Based on the State Health Plan forecast methodology, we estimate a need of over 240,000 home health visits by King County residents. This translates to approximately 9,800 planning area residents in need of home health services in King County.*

Wellspring Strengths - NEED

We would again emphasize Wellspring’s commitment to taking care of the community irrespective of a patient’s financial status. This policy is rooted in our core value and principle of servant leadership and compassionate care and highlights the ability of the proposed project to meet the needs of the poor and uninsured, a small but traditionally underserved population of home health users.

Wellspring is also dedicated to serving the veteran community. Wellspring’s President, Ernest Ibanga, served 23 years in the military and has developed Wellspring to help veterans and surviving

spouses by providing home health services designed to help retain their quality of life and stay in their home. Wellspring's goal is to help all veterans live with honor and dignity.

Wellspring Strengths – FINANCIAL FEASIBILITY

As demonstrated in Revised Exhibit 10 featuring the updated historical financial worksheet, Wellspring has continued to grow its Alaska operations considerably in 2020 with strong organization-wide financial performance. As an organization, Wellspring is well positioned financially to develop and operate the proposed Medicare and Medicaid certified home health services to King County residents.

Wellspring Strengths – STRUCTURE AND PROCESS OF CARE

See the response to screening question #10 related to staffing shortages. Wellspring acknowledges these concerns, but it is experienced in developing staffing solutions to meet the needs of the community. Notably, Wellspring has successfully staffed and operated a home health agency in Alaska, a state which has significant challenges with respect to recruitment and workforce development.

Wellspring is also committed to further developing relationships with providers in King County and the greater region and serving as a collaborative care partner to promote continuity of care.

Wellspring Strengths – COST CONTAINMENT / SUPERIORITY

See Table 5²⁵ below for a description of Wellspring's adherence to the superiority criteria for home health agencies established under the 1987 State Health Plan."

Public Comments

The following entity provided comment related to this sub-criterion. Following is an excerpt specific to this review sub-criterion.

Ernest Ibanga, President, Wellspring Home Health Center, LLC

*"If the new application by Healthy Living at Home satisfies the Department criteria of Need, Financial Feasibility, Structure and Process of Care, and Cost Containment, then it is **Wellspring's position that both the Wellspring and Healthy Living applications should be approved.** There currently exists significant need in King County for additional home health services. Based on the State Health Plan forecast methodology and the Department's evaluation used in its December 2019 denial of CN 20-02, we estimate net need of over 280,000 home health visits by King County residents by 2024. This translates to approximately 11,500 planning area residents in need of home health services in King County by 2024.2 Such tremendous need in the planning area means that the Department can approve both applications and remain consistent with the expressed public policy goal of Revised Code of Washington 70.38 that the development and/or expansion of health care facilities be accomplished in a planned, orderly fashion and without unnecessary duplication."*

²⁵ An updated table was provided in the public comment period.

Commenter's Table

Table 1: Superiority Criteria		
	Criteria	Wellspring
(a)	The proposed agency will meet state certification requirements.	Confirmed. Wellspring will meet all Washington state certification requirements
(b)	The proposed agency will serve either directly or through formal agreements with other providers the entire planning area in which it operates.	Wellspring will continue to develop relationships and collaborate with other providers in the planning area.
(c)	The proposed agency has a written policy and budget to serve clients without regard to their source of payment.	Please see Revised Exhibit 9 included in our March 2021 screening response, as well as the Need section included in this public comment letter.
(d)	The agency has a lower charge per visit compared to similarly-organized agencies providing comparable services in the home health planning area. "Organization" refers to whether the agency is freestanding or hospital-based.	Wellspring is a freestanding agency. The charges per visit projections for Washington State operations are based on Washington benchmarks based on public documents for other home health projects similar to Wellspring's proposed project.
(e)	The agency assures continuity of care by having documented formal linkages to other levels of care.	Confirmed. Wellspring is committed to being a partner in care with the greater health system and collaborating with other organization to promote continuity of care.
(f)	The agency has arrangements to provide charity care to clients who are unable to pay for services.	Please see Revised Exhibit 9 included in our March 2021 screening response, as well as the Need section included in this public comment letter.
(g)	The agency demonstrates a mechanism for measuring and responding to community concerns.	See CN 21-35 Application Exhibit 13 for Wellspring's Quality Improvement Program Policy.
Source: 1987 State Health Plan		

Rebuttal Comments

None

Department Evaluation

The department concluded in the need section of this evaluation that King County could accommodate another 29 home health agencies in projection year 2024. Wellspring provided a discussion of options considered, including, expanding its Medicare and Medicaid-certified home health services to the residents of Pierce County, this proposal, and not seeking a new agency. Since this project's advantages outweighed disadvantages when compared with the alternative options, Wellspring's rejection of options other than the one proposed in this application is appropriate. The department did not identify any alternative that was a superior alternative in terms of cost, efficiency, or effectiveness that is available or practicable. **This sub-criterion is met.**

HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC

For this project, HLH met the applicable review criteria under WAC 246-310-210, 220, and 230. Therefore, the department moves on to alternatives considered by the applicant. HLH considered the several options outlined in the following statements and table. [Source: Application, pp63-64]

“The alternatives that were considered are as follows:

1) Acquire an existing CoN certified Home Health Agency

a) Attempts were made via direct contact with existing home health agencies to determine their interest level in selling. None of the agencies contacted had any interest at this time.

Alternative attempts to assess availability of agencies for sale were made by contacting brokers as well as the State’s needs analysts both of which were unable to identify any Home Health agencies for sale.

Based on the lack of available CoN certified Home Health agencies in King County the applicant eliminated the possibility of acquiring an agency.

2) Not pursue a CoN certified Home Health Agency

a) Not pursuing the certificate of need to establish a Home Health agency in King County fails to resolve the unmet service needs of the patients in this area as identified in this application. As such, this option is ruled out as a viable alternative.

Based on the alternatives considered prior to submitting this project, the applicant determined that establishing a new Medicare and Medicaid home health agency in King County is the best path forward as it addresses the need for additional home health in the planning area. The applicant intends to increase home health access for all King County residents.

Additional discussion and evaluation of alternative financing options is made here:

Identify all financing alternatives considered prior to submitting this project. At a minimum include a brief discussion of this project versus no project.

- 1) Bank Loan (Financing)*
- 2) Hard Money Loan (Financing)*
- 3) Raising Money from outside sources (Equity / Financing)*

Criteria used to determine if any of the alternative financing options should be considered are as follows:

- 1) Cost*
- 2) Access*
- 3) Availability*
- 4) Amount*

Table 1.0 comparing alternative financing options				
Criteria	Inter-Company Contribution	Bank Loan	Hard Money	Fundraising
Cost	Zero interest rate	8%+ interest rate	15-30%+ Interest	6% - 9%+
Access	Immediate	Moderate	Moderately Accessible	Difficult due to the length of time needed to fund raise
Availability	Immediate	90-120 days	30-60 days	3-9 months
Amount	Sufficient to cover long range project costs	unable to make a determination as a new line of credit would need to be established with the bank	Sufficient to cover long range costs	Unable to estimate / assess based on institutional capital available for new start ups

The best financing option for the success of this long term project is the inter-company contribution from Healthy Living Network.”

Public Comments

None

Rebuttal Comments

None

Department Evaluation

The department concluded in the need section of this evaluation that King County could accommodate another 29 home health agencies in projection year 2024. HLH provided a discussion of options considered, including, acquiring an existing CN-approved agency, doing nothing, and this proposal. Since finding no agencies available for sale, and based on the growing need for services, HLH’s rejection of options other than the one proposed in this application is appropriate. The department did not identify any alternative that was a superior alternative in terms of cost, efficiency, or effectiveness that is available or practicable. **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 Wellspring Home Health Center, LLC dba Wellspring Home Health Center

This proposal does not involve construction; thus, this sub-criterion does not apply to this project.

Department Evaluation for HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC

This proposal 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.

Wellspring Home Health Center, LLC dba Wellspring Home Health Center

Wellspring provided the following statement related to this sub criterion. [Source: Application, p31]

“There is significant unmet need for home health services currently in the King County, as demonstrated by the Department’s numeric need methodology for home health services. The proposed Wellspring Home Health project will help increase capacity in the planning area, providing King County residents with timely access to home health services, which will result in enhanced quality, outcomes, and patient experience as patients won’t have to delay or forgo receiving the necessary skilled services due to lack of access. Further, without sufficient access home health, this can also lead to increased costs due to preventable emergency room visits or hospitalizations and patients having to receive care at more expensive care alternatives.”

Public Comments

None

Rebuttal Comments

None

Department Evaluation

Wellspring provided sound and reasonable rationale for expanding its existing services to include Medicare and Medicaid-certified home health services to King County residents. If approved, this project has the potential to improve delivery of necessary in-home services to King County residents. **This sub-criterion is met.**

HLH Seattle Holdings, LLC dba Healthy Living at Home – Seattle, LLC

HLH provided the following statement related to this sub criterion. [Source: Application, p65]

“If approved, this project will improve delivery of necessary in-home services to King County residents. The need methodology demonstrates a net need of 22 additional Home Health agencies for King County in 2021, and 26 by 2023. This project, if approved, would increase the availability of Medicare home health services to the residents of King County. Home Health services are a critical component of cost savings strategies for King County’s acute and post-acute hospital and skilled nursing providers. When in-home services are insufficiently available, inpatient providers have difficulty discharging patients on a timely basis.

Additional cost improvements are seen by reducing hospitalizations and ER visits. When a patient is recovering from an illness or injury at home, or is discharged to home from an acute setting, there is an increased risk of re-injury as the patient recovers. Sufficient home health services can prevent re-injury and reduce the risk of unnecessary acute care where there are significantly higher costs.”

Public Comments

None

Rebuttal Comments

None

Department Evaluation

HLH provided sound and reasonable rationale for establishing Medicare and Medicaid-certified home health services for King County residents. If approved, this project has the potential to improve delivery of necessary in-home services to King County residents. **This sub-criterion is met.**

APPENDIX A

Home Health Supply for King County
Certificate of Need Applications 21-35 and 21-44
Updated August 2021

Agency	License Number	CN HH Files Research	ILRs Research	Internet Research	CN Survey Research	Conclusion
A and K Health Care Services L	IHS.FS.60844133		Service Area(s): King, Pierce Number of HH FTEs: 1.83 Services: RN, HHA, PC, chore License 1st issued: 06/28/2018	URL: None found	2019 data: Survey completed, no King admits or visits, 1st year of service listed as 2018. 2018 data: No survey completed.	Excluded No King admits or visits in its most recent utilization survey, year 2020; and unable to verify what services are currently available to King County.
Advanced Health Care	IHS.FS.00000206		Service Area(s): Grays, King, Kitsap, Lewis, Mason, Pierce, Thurston Number of HH FTEs: 80 Services: RN, HHA, PC, chore, RC, transport License 1st issued: predates ILRs	URL: https://www.advanced-healthcare.com/services/ Limitations (if any): Does not appear to offer therapy or home health aide services.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Limited services do not meet the definition of home health agency according to the SHP.
AdvisaCare	IHS.FS.00000156		Service Area(s): Chelan, Cowlitz, Island, King, Kitsap, Pierce, Skagit, Thurston Number of HH FTEs: 15 Services: RN, PC, chore, RT, transport License 1st issued: predates ILRs	URL: www.advisacare.com Limitations (if any): None	2019 data: No survey completed. 2018 data: No survey completed.	Included
Agape Healthcare Services LLC	IHS.FS.60876117		Service Area(s): King, Pierce, Snohomish Number of HH FTEs: 4 Services: RN, HHA, OT, PT, PC License 1st issued: 08/30/2018	URL: https://www.agapehealthcarenw.com/home-health-care-services Limitations (if any): Does not appear to offer therapy or home health aide services.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Limited services do not meet the definition of home health agency according to the SHP.
Amedisys Home Health	IHS.FS.61035006		Service Area(s): King Number of HH FTEs: 12.5 Services: RN, ST, PT, HHA, MSW, OT, IV License 1st issued: 03/02/2020	URL: www.amedisys.com Limitations (if any): None	2019 data: Survey completed, no King admits or visits, CHOW 2020. 2018 data: No survey completed.	Included
American Healthcare Services	IHS.FS.00000214		Service Area(s): King Number of HH FTEs: 2.0 Services: RN, HHA, DME, PC, chore, RC, transport License 1st issued: predates ILRs	URL: http://www.amhomehealth.net/home-health-services-in-broadway-seattle-washington Limitations (if any): None	2019 data: Survey completed, limited King admits & visits (5 each), 1st year of serces listed as '21' 2018 data: No survey completed.	Included
Amicable Health Care	IHS.FS.00000215	Medicare & Medicaid-certified	Service Area(s): King, Piece, Snohomish Number of HH FTEs: 1.0 Services: RN, HHA, PC, chore, RC, transport License 1st issued: predates ILRs	URL: www.amicablehealth.net Limitations (if any): None	2019 data: No survey completed. 2018 data: Survey completed, no King admits or visits, 1st year of service listed as 2018.	Included
A-One Home Care	IHS.FS.00000219		Service Area(s): Chelan, Island, King, Skagit, Snohomish, Whatcom Number of HH FTEs: 31 Services: RN, HHA License 1st issued: predates ILRs	URL: https://www.aonemedicalservices.com/pages/services Limitations (if any): None	2019 data: No survey completed. 2018 data: No survey completed.	Included

Home Health Supply for King County
Certificate of Need Applications 21-35 and 21-44
Updated August 2021

Agency	License Number	CN HH Files Research	ILRs Research	Internet Research	CN Survey Research	Conclusion
Ashley House	IHS.FS.00000227		Service Area(s): All counties in the State Number of HH FTEs: 79 Services: RN, HHA, MSW, BC, PC, RT, transport License 1st issued: predates ILRs	None functioning	2019 data: Survey completed, limited King admits & visits, 1st year of service listed as 1989. 2018 data: No survey completed.	Excluded Services not accessible to all residents of King County.
Assured Home Health	IHS.FS.60497952	Medicare & Medicaid-certified	Service Area(s): King, Pierce, Snohomish Number of HH FTEs: 23 Services: RN, HHA, ST, MSW, OT, PT License 1st issued: 09/10/2014	URL: https://lhcgroupp.com/locations/assured-home-health-of-renton/ Limitations (if any): None	2019 data: Survey completed, King admits & visits, 1st year 2017. 2018 data: Survey completed, King admits & visits, 1st year 2017.	Included
Atlas Home Health	IHS.FS.61117906		Service Area(s): King, Kitsap, Mason, Pierce Number of HH FTEs: 4 Services: RN, HHA, PC, chore, RC, transport License 1st issued: PENDING	URL: None found	2019 data: No survey completed. 2018 data: No survey completed.	Excluded License pending. Unable to verify what if any services will be available to residents of King.
Avail Home Health	IHS.FS.00000231		Service Area(s): King, plus 27 counties Number of HH FTEs: 125 Services: RN, HHA, PC, chore, RC, transport License 1st issued: predates ILRs	URL: http://www.availhome.com/ Limitations (if any): None	2019 data: No survey completed. 2018 data: No survey completed.	Included
Aveanna Healthcare	IHS.FS.00000452		Service Area(s): King, plus 26 counties Number of HH FTEs: 93 Services: RN, HHA, PC, chore, RC, transport License 1st issued: predates ILRs	URL: https://www.aveanna.com/locations.html Limitations (if any): All the Washington State locations appear to only provide pediatric & adult private duty nursing.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Limited services do not meet the definition of home health agency according to the SHP.
Bethany Home Health LLC	IHS.FS.60966822		Service Area(s): King, Skagit, Snohomish Number of HH FTEs: 2 Services: RN, HHA, DME, ST, MSW, OT, NC, BC, PT, IV, ABA, PC, chore, transport, PC License 1st issued: 07/22/2020	URL: Only nursing facilities' webpages found	2019 data: No survey completed. 2018 data: Survey response, no King admits or visits.	Excluded License home health FTE count to service area ratio, likely unable to serve the entirety of each county.
Brightstar Care	IHS.FS.60934498		Service Area(s): King, Pierce, Thurston Number of HH FTEs: 3 Services: RN, HHA, ST, NC, PT, MSW, OT, IV, RT, ABA, PC, chore, RC, transport License 1st issued: 06/20/2019	URL: https://www.brightstarcare.com/bellevue-eastside/home-care/skilled-nursing-services Limitations (if any): Service area includes only "Bellevue & North Seattle"	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Services not accessible to all residents of King County.
Brookdale Home Health	IHS.FS.61186662	Medicare & Medicaid-certified	Service Area(s): Island, King, Snohomish Number of HH FTEs: 20.96 Services: RN, ST, PT, HHA, MSW, OT, IV, RT License 1st issued: 01/15/2015	URL: https://www.brookdale.com/en/our-services/home-health/our-services.html Limitations (if any): None	2019 data: No survey completed. 2018 data: Survey completed, King admits & visits, 1st year 2013.	Included

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Careage Home Health	IHS.FS.60007888	Medicare & Medicaid-certified	Service Area(s): King Number of HH FTEs: 40 Services: RN, HHA, ST, PC, chore, MSW, OT, PT License 1st issued: 10/01/2019	URL: https://www.careage.com/senior-living/wa/bellevue/ne-29th-place/about-us Limitations (if any): None	2019 data: No survey completed. 2018 data: No survey completed.	Included
Careforce	IHS.FS.00000243		Service Area(s): King, plus 14 counties Number of HH FTEs: 28 Services: RN, HHA, chore, PC, RC, transport License 1st issued: predates ILRs	URL: https://careforce.com/services/ Limitations (if any): Does not appear to offer therapy or home health aide services.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Limited services do not meet the definition of home health agency according to the SHP.
CHI Franciscan Health at Home	IHS.FS.60506466	Medicare & Medicaid-certified	Service Area(s): King, Kitsap, Pierce Number of HH FTEs: 48 Services: RN, HHA, ST, MSW, OT, PT License 1st issued: 11/26/2014	URL: https://www.chifranciscan.org/health-care-services/health-at-home.html Limitations (if any): None	2019 data: No survey completed. 2018 data: No survey completed.	Included
Childrens Country Home	IHS.FS.00000253		Service Area(s): King Number of HH FTEs: 21 Services: RN, HHA, MS, IV License 1st issued: predates ILRs	URL: www.childrenscountryhome.org Limitations (if any): Services only available to children.	2019 data: Survey completed, limited King admits & visits, 1st year 1997. 2018 data: No survey completed.	Excluded Services not accessible to all residents of King County.
Childress Nursing Services	IHS.FS.60959298		Service Area(s): King, Pierce, Snohomish Number of HH FTEs: 3 Services: RN, ST, NC, PT, HHA, MSW, OT, RT, DME, PC, chore, transport License 1st issued: 02/25/2020	URL: https://www.childressnursing.com/about Limitations (if any): Services focus on supporting women and their families from pre-conception to post-delivery.	2019 data: No survey completed. 2018 data: Survey completed, no King admits or visits, 1st year listed as 2020.	Excluded Limited services do not meet the definition of home health agency according to the SHP.
Comfort of Care	IHS.FS.61105988		Service Area(s): King, Lincoln, Mason, Okanogan, Snohomish Number of HH FTEs: 5 Services: RN, HHA, PC, chore, transport License 1st issued: PENDING	URL: None found	2019 data: No survey completed. 2018 data: No survey completed.	Excluded License pending. Unable to verify what if any services will be available to residents of King.
Critical Nurse Staffing LLC	IHS.FS.60852239		Service Area(s): All other counties in the State Number of HH FTEs: 45 Services: RN, HHA, PC, chore, RC, transport License 1st issued: 04/24/2018	URL: https://cnscares.com/locations/ & https://cnscares.com/home-care-services/ Limitations (if any): Services appear to only be available to specific types of workers.	2019 data: No survey completed. 2018 data: Survey completed, limited King admits & visits, 1st year 2018.	Excluded Services not accessible to all residents of King County.
D.C.S. LLC	IHS.FS.60871359		Service Area(s): Chelan, King, Pierce Number of HH FTEs: 2.62 Services: RN, HHA, PC, chore, transport License 1st issued: 07/31/2018	None found	2019 data: Survey completed, no King admits or visits, 1st year 2019. 2018 data: No survey completed.	Excluded Unable to verify what if any services will be available to residents of King.
Day by Day Nursing Services	IHS.FS.60907239		Service Area(s): King, Snohomish Number of HH FTEs: 2 Services: RN, HHA, MSW, PC, chore, RC, transport License 1st issued: 01/09/2020	URL: https://www.facebook.com/daybydaynursing/ Limitations (if any): Service area not specified.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Unable to verify what if any services will be available to residents of King.

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Eden Home Health	IHS.FS.60871865	Medicare & Medicaid-certified	Service Area(s): King Number of HH FTEs: 1 Services: RN, HHA, ST, MSW, OT, PT License 1st issued: 11/21/2018	URL: https://www.empres.com/service/home-health/ Limitations (if any): None	2019 data: Survey completed, King admits & visits, 1st year 2018. 2018 data: No survey completed.	Included
Encore Home Health	IHS.FS.60922864		Service Area(s): King, Pierce, Snohomish, Thurston Number of HH FTEs: 32.75 Services: RN, HHA, ST, MSW, OT, PT License 1st issued: 12/22/2014	URL: Only nursing facilities' webpages found	2019 data: No survey completed. 2018 data: No survey completed.	Included
Envision Home Health	IHS.FS.60521160	Medicare & Medicaid-certified	Service Area(s): Snohomish, plus King, Pierce, Thurston Number of HH FTEs: 32.75 Services: RN, HHA, ST, MSW, OT, PT License 1st issued: 12/22/2014	URL: https://www.envisionhomehealth.com/home-health-wa/ Limitations (if any): None	2019 data: Survey completed, King admits & visits, 1st year 2015. 2018 data: Survey completed, King admits & visits, 1st year 2015.	Included
Estelita Su Homecare	IHS.FS.60542868		Service Area(s): King, Snohomish Number of HH FTEs: 5 Services: RN, HHA, PC, chore, RC, transport License 1st issued: 08/21/2015	URL: http://estelita.care/services Limitations (if any): Services listed are all non-medical with medical services listed under other.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Limited services do not meet the definition of home health agency according to the SHP.
Evergreen Health	IHS.FS.00000278	Medicare & Medicaid-certified	Service Area(s): Island, King, Snohomish Number of HH FTEs: 202.20 Services: RN, HHA, DME, ST, RT, MSW, OT, NC, BC, PT, IV, PC License 1st issued: predates ILRs	URL: https://www.evergreenhealth.com/home-health Limitations (if any): None	2019 data: Survey completed, King admits & visits, 1st year 1986. 2018 data: Survey completed, King admits & visits, 1st year 1986.	Included
Everhome Healthcare	IHS.FS.00000184		Service Area(s): King, plus nine counties Number of HH FTEs: 9 Services: RN, HHA, PT, OT, ST, MSW, IV, PC, chore, RC License 1st issued: 01/01/2007	URL: www.chcservices.com https://www.everhomehealthcare.com/about-us Limitations (if any): None	2019 data: No survey completed. 2018 data: No survey completed.	Excluded License home health FTE count to service area ratio, likely unable to serve the entirety of each county.
Family Resource Home Care	IHS.FS.60857773		Service Area(s): King, plus 21 counties Number of HH FTEs: 50 Services: RN, HHA, PC, RC, chore, transport License 1st issued: 05/23/2018	URL: www.fhccares.com https://www.familyresourcehomecare.com/how-we-help/frequently-asked-questions/ Limitations (if any): None	2019 data: Survey completed, King admits & visits, 1st year 2018. 2018 data: Survey completed, no King admits or visits.	Included
Fedelta Care Solutions	IHS.FS.61028960		Service Area(s): King, plus 6 counties Number of HH FTEs: 50 Services: RN, HHA, PC, chore, PC, transport, IV License 1st issued: 12/13/2019	URL: www.fedeltahomecare.com Limitations (if any): None	2019 data: No survey completed. 2018 data: No survey completed.	Included
Goldencare Home Health Agency	IHS.FS.60720687		Service Area(s): King Number of HH FTEs: 5 Services: RN, HHA, DME, RT, ST, MSW, OT, NC, PT, PC, chore, RC License 1st issued: 03/19/2018	URL: www.goldencarefamilyhospice.com Limitations (if any): Services limited to home care services.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Limited services do not meet the definition of home health agency according to the SHP.

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Guardian Home Care	IHS.FS.60266397		Service Area(s): King, plus 21 counties Number of HH FTEs: 25.82 Services: RN, ST, NC, PT, HHA, MSW, OT, PC, chore, RC License 1st issued: 03/07/2012	URL: https://www.amadaseniorcare.com/senior-care-services/ Limitations (if any): Services limited to home care services.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Limited services do not meet the definition of home health agency according to the SHP.
Harbor Health Solutions LLC	IHS.FS.60892797		Service Area(s): King, plus 17 counties Number of HH FTEs: 18 Services: RN, PT, HHA, IV, ABA, PC, chore, RT, transport License 1st issued: 04/16/2019	None found	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Unable to verify what if any services are available to residents of King.
Haven Home Health Care	IHS.FS.61108148	Medicare & Medicaid-certified	Service Area(s): King Number of HH FTEs: 2 Services: RN, ST, PT, HHA, MSW, OT, PC License 1st issued: 10/01/2020	URL: https://www.havenhhc.com/medicare/ Limitations (if any): None	2019 data: No survey completed. 2018 data: No survey completed.	Included
Home Care by Wesley	IHS.FS.00000028		Service Area(s): King, Pierce Number of HH FTEs: 2.3 Services: RN, OT, PT License 1st issued: 01/01/2003	URL: https://wesleychoice.org/health-services/home-health/ Limitations (if any): None	2019 data: No survey completed. 2018 data: No survey completed.	Excluded License home health FTE count to service area ratio, likely unable to serve the entirety of each county.
Husky Senior Care	IHS.FS.60082962		Service Area(s): Island, King, Pierce, Snohomish Number of HH FTEs: 4 Services: RN, HHA, PC, chore, RC, ST License 1st issued: 04/01/2009	URL: https://www.huskyseniorcare.com/services-fees Limitations (if any): Does not appear to offer therapy or home health aide services.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Limited services do not meet the definition of home health agency according to the SHP.
ICHS PACE at Legacy House	IHS.FS.60904213		Service Area(s): King Number of HH FTEs: 13.5 Services: RN, HHA, DME, ST, RT, MSW, OT, NC, BC, PT, IV, ABA, chore, PC, RC, transport License 1st issued: 12/11/2018	URL: www.ichs.com Limitations (if any): None	2019 data: No survey completed. 2018 data: No survey completed.	Included
Infinity Homehealth Solutions	IHS.FS.60955703		Service Area(s): King, Kitsap, Pierce, Thurston, Yakima Number of HH FTEs: 5 Services: RN, ST, NC, PT, HHA, MSW, OT, IV, RT, DME, ABA, PC, chore, RC, transport License 1st issued: 07/10/2019	URL: https://ihhsolutions.com/about-us/ Limitations (if any): No service area specified, but office in Federal Way.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded License home health FTE count to service area ratio, likely unable to serve the entirety of each county.
Journey Nursing Services	IHS.FS.61114400		Service Area(s): Island, King, Pierce, Skagit, Snohomish Number of HH FTEs: 3.1 Services: RN, NC, HHA, MSW, IV, chore, PC, RC, transport License 1st issued: 02/10/2021	URL: https://www.journenursingservices.com/services Limitations (if any): Services limited to home care services.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Limited services do not meet the definition of home health agency according to the SHP.

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Judson Park	IHS.FS.60291296		Service Area(s): King Number of HH FTEs: 7.9 Services: RN, HHA, PC, chore, transport License 1st issued: 09/13/2012	URL: Only nursing facilities' webpages found	2019 data: No survey completed. 2018 data: Survey completed, King admits & visits, 1st year 2005.	Excluded Unable to confirm if services accessible to all residents of King County.
Kaiser Permanente Home Health and Hospice	IHS.FS.00000305	Medicare & Medicaid-certified	Service Area(s): King, Kitsap, Pierce, Snohomish Number of HH FTEs: 139.89 Services: RN, HHA, ST, MSW, OT, PT License 1st issued: predates ILRs	URL: https://healthy.kaiserpermanente.org/washington/s-hop-plans#individual-and-family-plans Limitations (if any): Services only available to members.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Services not accessible to all residents of King County.
Kindred at Home	IHS.FS.00000295		Service Area(s): King, Snohomish Number of HH FTEs: 26.11 Services: RN, HHA, ST, MSW, OT, NC, PT License 1st issued: predates ILRs	URL: www.gentiva.com https://www.kindredhealthcare.com/our-services/home-care/types-of-care Limitations (if any): None	2019 data: No survey completed. 2018 data: No survey completed.	Included
Kindred at Home	IHS.FS.00000293		Service Area(s): King Number of HH FTEs: 110 Services: RN, HHA, ST, MSW, OT, PT License 1st issued: predates ILRs	URL: www.gentiva.com https://www.kindredhealthcare.com/our-services/home-care/types-of-care Limitations (if any): None	2019 data: No survey completed. 2018 data: No survey completed.	Included
Kline Galland Community Base	IHS.FS.60103742	Medicare & Medicaid-certified	Service Area(s): King Number of HH FTEs: 43.5 Services: RN, HHA, PT, OT, ST, MSW License 1st issued: 09/17/2009	URL: www.klinegalland.org Limitations (if any): None	2019 data: No survey completed. 2018 data: No survey completed.	Included
Light Within Home Health	IHS.FS.61143217		Service Area(s): King, Pierce Number of HH FTEs: 2 Services: RN, PT, HHA, OT, IV, NC, RT, PC, chore, RT, transport License 1st issued: 05/21/2021	None found	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Unable to verify what if any services are available to residents of King.
Maxim Healthcare Services	IHS.FS.00000375		Service Area(s): King, plus 20 counties Number of HH FTEs: 53.28 Services: RN, chore, ST, RT, OT, PT, IV License 1st issued: 06/26/2003	URL: https://www.maximhealthcare.com/locations/seattle-wa Limitations (if any): Does not appear to offer therapy or home health aide services.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Limited services do not meet the definition of home health agency according to the SHP.
MultiCare Home Health, Hosp	IHS.FS.60081744	Medicare & Medicaid-certified	Service Area(s): King, Pierce Number of HH FTEs: 89 Services: RN, ST, PT, HHA, MSW, OT License 1st issued: 02/27/2008	URL: https://www.multicare.org/services-and-departments/multicare-home-health-hospice/ Limitations (if any): None	2019 data: Survey completed, King admits & visits, 1st year 2009. 2018 data: Survey completed, King admits & visits, 1st year 2009.	Included
Nuclear Care Partners LLC	IHS.FS.60670421		Service Area(s): All counties in the State Number of HH FTEs: 39 Services: RN, HHA License 1st issued: 10/04/2016	URL: https://www.nuclearcarepartners.com/care-services/in-home-care/ Limitations (if any): Services are only available to former Department of Energy, atomic, and Uranium workers.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Services not accessible to all residents of King County.

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Nursing Evolutions	IHS.FS.60318430		Service Area(s): Clallam, Jefferson, King, Kitsap, Mason, Pierce, Snohomish, Thurston Number of HH FTEs: 18 Services: RN, ST, RT, OT, PT, IV License 1st issued: 04/05/2013	URL: https://www.nursingevolutions.com/what-we-do Limitations (if any): Services limited to medically fragile infants and toddlers.	2019 data: Survey completed with limited King admits & visits, 1st year 2015. 2018 data: No survey completed.	Excluded Services not accessible to all residents of King County.
PNW Pace Partners	IHS.FS.61160759		Service Area(s): King, Pierce Number of HH FTEs: 10 Services: RN, ST, NC, PT, HHA, MSW, OT, PC, RC, chore, transport License 1st issued: PENDING	URL: None found	2019 data: No survey completed. 2018 data: No survey completed.	Excluded License pending. Unable to verify what if any services will be available to residents of King.
Popes Kids Place	IHS.FS.60083889		Service Area(s): All counties in the State Number of HH FTEs: 25 Services: RN, PT, HHA, IV, PC, RC, transport License 1st issued: 06/01/2009	URL: https://popesplace.org/services/ Limitations (if any): Services only available to persons from birth to early adulthood.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Services not accessible to all residents of King County.
Precision Home Health	IHS.FS.61034384		Service Area(s): King, Snohomish Number of HH FTEs: 2 Services: RN, ST, NC, PT, HHA, MSW, OT, IV, NC, None found RT, DME, ABA, PC, chore, RC, transport License 1st issued: 10/01/2020		2019 data: No survey completed. 2018 data: No survey completed.	Excluded Unable to verify what if any services are available to residents of King.
Professional Case Managemer	IHS.FS.60474800		Service Area(s): King, plus 21 counties Number of HH FTEs: 95.26 Services: RN, HHA, PC, chore License 1st issued: 07/21/2014	URL: www.procasemanagement.com Limitations (if any): Services are only available to former Department of Energy, atomic, and Uranium workers.	2019 data: Survey completed, no King admits or visits, 1st year 2014. 2018 data: Survey completed, limited King admits & visits, 1st year 2018.	Excluded Services not accessible to all residents of King County.
Providence at Home	IHS.FS.61127868		Service Area(s): King, plus six counties Number of HH FTEs: 7 Services: RN, ST, PT, HHA, OT, IV, RT License 1st issued: PENDING	URL: None found	2019 data: No survey completed. 2018 data: No survey completed.	Excluded License pending. Unable to verify what if any services will be available to residents of King.
Providence Elder Place	IHS.FS.00000415		Service Area(s): King Number of HH FTEs: 16 Services: RN, HHA, PT, OT, ST, RT, MSW, DME, IV, NC, BC, PC, chore, RC License 1st issued: predates ILRs	URL: https://www.providence.org/locations?postal=98001&lookup=&lookupvalue=&page=1&radius=1500&term=providence%20elderplace Limiations (if any): None	2019 data: Survey completed, King admits & visits, 1st year 1995 2018 data: Survey completed, King admits & visits, 1st year 1995	Included
Providence Home Services	IHS.FS.00000419	Medicare & Medicaid-certified	Service Area(s): King Number of HH FTEs: 165 Services: RN, HHA, ST, MSW, OT, PT License 1st issued: predates ILRs	URL: https://www.providence.org/locations?postal=98001&lookup=&lookupvalue=&page=1&radius=1500&term=providence%20home%20services Limitations (if any): None	2019 data: Survey completed, King admits & visits, 1st year 1988. 2018 data: Survey completed, King admits & visits, 1st year 1988.	Included

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Puget Sound Home Health of I	IHS.FS.60751653	Medicare & Medicaid-certified	Service Area(s): King, Pierce Number of HH FTEs: 14.08 Services: RN, HHA, ST, OT, NC, PT License 1st issued: 05/26/2017	URL: http://pugetsoundhh.com/services/ Limitations (if any): None	2019 data: No survey completed. 2018 data: Survey completed, King admits & visits, 1st year 2012.	Included
Reliable Healthcare	IHS.FS.60851874		Service Area(s): All counties in the State Number of HH FTEs: 45.84 Services: RN, ST, PT, HHA, MSW, OT, RT, PC, chore, transport License 1st issued: 05/16/2018	URL: https://www.reliablehealth.care/services/ Limitations (if any): None	2019 data: Survey completed, no King admits or visits. 2018 data: No survey completed.	Excluded License home health FTE count to service area ratio, likely unable to serve the entirety of each county.
Restoration Health Services	IHS.FS.61090653		Service Area(s): King, Pierce, Snohomish, Spokane Number of HH FTEs: 5 Services: RN, HHA, RT, ST, OT, PT, IV, PC, chore, transport License 1st issued: 08/31/2020	URL: http://www.rhscare.com/home-health-care-services Limitations (if any): Staffing agency	2019 data: Survey completed with no King admits or visits. 2018 data: No survey completed.	Excluded Staffing agency and no King admits or visits in its most recent utilization survey, year 2020.
Right At Home	IHS.FS.00000096		Service Area(s): King, plus 14 counties Number of HH FTEs: 14 Services: RN, HHA, IV, PC, chore, transport, RC License 1st issued: 01/01/2004	URL: https://www.rightathome.net/services Limitations (if any): None	2019 data: Survey completed, King admits & visits, 1st year 2009. 2018 data: No survey completed.	Included
Ro Health	IHS.FS.60610351		Service Area(s): Clark, Cowlitz, King, Kitsap, Lewis, Pierce, Snohomish Number of HH FTEs: 9 Services: RN, HHA License 1st issued: 01/21/2016	URL: https://rohealth.com/ Limitations (if any): Limitations in services, the home health-specific page is no longer functioning and is not mentioned on any other active page. Also self-identified as a staffing agency.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Staffing agency
RWW Home and Community Rehab Services, Inc.	IHS.FS.60263077		Service Area(s): King, plus 11 counties Number of HH FTEs: 9 Services: RN, ST, MSW, OT, PT, ABA License 1st issued: 01/10/2012	URL: https://www.rehabwithoutwalls.com/settings/home-and-community-rehab/ Limitations (if any): Services focus on specific injury types.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Limited services do not meet the definition of home health agency according to the SHP.
Sea Mar Home Health	IHS.FS.00000433	Medicare & Medicaid-certified	Service Area(s): King Number of HH FTEs: 2 Services: RN, ST, PT, MSW, OT, DME License 1st issued: predates ILRs	URL: www.seamar.org	2019 data: Survey completed, King admits & visits, 1st year 2007. 2018 data: Survey completed, King admits & visits, 1st year 1998.	Included
Seattle Childrens Hospital Home Care Services	IHS.FS.00000097		Service Area(s): All counties in the State Number of HH FTEs: 59.21 Services: RN, DME, RT, NC, IV License 1st issued: predates ILRs	URL: https://www.seattlechildrens.org/clinics/home-care-services/ Limitations (if any): Services are only available to children.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Services not accessible to all residents of King County.

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Serengeti Care	IHS.FS.60660148		Service Area(s): Chelan, Douglas, King, Kitsap, Pierce, Snohomish, Spokane, Yakima Number of HH FTEs: 2 Services: RN, HHA, PC, chore, transport, RC License 1st issued: 06/17/2016	URL: https://serengeticare.com/services/home-health/ Limitations (if any): None	2019 data: No survey completed. 2018 data: No survey completed.	Excluded License home health FTE count to service area ratio, likely unable to serve the entirety of each county.
Signature Healthcare at Home	IHS.FS.00000220	Medicare & Medicaid-certified	Service Area(s): King, Snohomish Number of HH FTEs: 51 Services: RN, HHA, ST, MSW, OT, PT License 1st issued: predates ILRs	URL: https://signaturehch.com/health Limitations (if any): None	2019 data: No survey completed. 2018 data: No survey completed.	Included
Signature Healthcare at Home	IHS.FS.00000382	Medicare & Medicaid-certified	Service Area(s): King, Kitsap, Pierce Number of HH FTEs: 51.6 Services: RN, ST, PT, HHA, MSW, OT License 1st issued: predates ILRs	URL: https://signaturehch.com/health Limitations (if any): None	2019 data: No survey completed. 2018 data: No survey completed.	Included
Sofavi Home Health LLC	IHS.FS.60950400		Service Area(s): King, Skagit Number of HH FTEs: 3.23 Services: RN, PT, RT, PC, RC, transport License 1st issued: 04/16/2019	None found	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Unable to verify what if any services are available to residents of King.
Sound Options	IHS.FS.60863143		Service Area(s): King, Kitsap, Pierce, Thurston Number of HH FTEs: 5 Services: RN, HHA, PC, RT, chore, transport License 1st issued: 06/01/2018	URL: https://www.soundoptions.com/care-management Limitations (if any): Does not appear to offer therapy or home health aide services.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Limited services do not meet the definition of home health agency according to the SHP.
Total Home Health Care LLC	IHS.FS.61135506		Service Area(s): King Number of HH FTEs: 1 Services: RN, PT, HHA, MSW, OT, IV, NC, RT, PC, chore, RC, transport License 1st issued: PENDING	None found	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Unable to verify what if any services are available to residents of King.
Transitions Care Management, LLC	IHS.FS.61057211		Service Area(s): King, Kitsap, Pierce, Snohomish Number of HH FTEs: 12 Services: RN, NC, MSW, IV, DME, ABA, transport License 1st issued: 05/29/2020	URL: https://transitionscaresmanagement.com/services/care-manager/people-wishing-age-well/ Limitations (if any): Services appear to be broadly non-medical.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Limited services do not meet the definition of home health agency according to the SHP.
Tulamore, Inc.	IHS.FS.61043336		Service Area(s): King, Snohomish Number of HH FTEs: 2 Services: RN, ST, NC, PT, HHA, MSW, OT, IV, RT, DME, ABA, PC, chore, transport License 1st issued: 08/24/2020	URL: https://tulamorecares.us/programs-services/ Limitations (if any): Service area not specified.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Unable to verify what if any services will be available to residents of King.

Home Health Supply for King County
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Agency	License Number	CN HH Files Research	ILRs Research	Internet Research	CN Survey Research	Conclusion
Universal Home Care LLC	IHS.FS.60631342		Service Area(s): King Number of HH FTEs: 2 Services: RN, HHA, ST, RT, PT, OT, PC, RC, transport License 1st issued: 09/16/2016	None functioning	2019 data: Survey completed, limited King admits & visits, 1st year 2016. 2018 data: No survey completed.	Excluded License home health FTE count to service area ratio, likely unable to serve the entirety of each county.
Visions Home Health Care	IHS.FS.00000134		Service Area(s): King Number of HH FTEs: 3.15 Services: RN, HHA, PC, transport, chore License 1st issued: 01/01/2006	None found	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Unable to verify what if any services will be available to residents of King.
Wellspring Home Health, LLC	IHS.FS.61055973		Service Area(s): King, Pierce, Thurston Number of HH FTEs: 13 Services: RN, PT, HHA, OT, RT, DME, ABA, PC, chore, RC, transport License 1st issued: 03/26/2020	URL: https://www.wellspringhomehealth.com/services/ Limitations (if any): None	2019 data: Survey completed, no King admits or visits, 1st year 2020. 2018 data: No survey completed.	Included
Wesley Health and Homecare	IHS.FS.60276500	Medicare & Medicaid-certified	Service Area(s): King, Pierce, Snohomish Number of HH FTEs: 10.5 Services: RN, HHA, PT, OT, ST, MSW License 1st issued: 03/14/2012	URL: https://wesleychoice.org/hh-lp/ Limitations (if any): None	2019 data: No survey completed. 2018 data: Survey completed, King admits & visits, 1st year 2007.	Included
Wilderness Shores Nursing	IHS.FS.60055610		Service Area(s): King, Pierce Number of HH FTEs: 4.5 Services: RN, HHA, PC License 1st issued: 04/01/2009	URL: https://wildernessshoresnursing.com/index.php/private-nursing-services Limitations (if any): Does not appear to offer therapy or home health aide services.	2019 data: No survey completed. 2018 data: No survey completed.	Excluded Limited services do not meet the definition of home health agency according to the SHP.

APPENDIX B

Home Health Methodology

Updated August 2021

Requested Counties	Gross Need	Total Existing Supply	Net Need*
King	60.35	31	29

*a negative number indicates a surplus

There are four parts to this document:

The population worksheet contains population information from the Office of Financial Management (OFM)

Data source: Projections of the Population by Age and Sex for Growth Management, 2017 GMA Projections - Medium Series

The existing agencies worksheet contains all active In-Home Service Agencies that are licensed to provide home health¹ services in Washington State.²

The methodology worksheet contains the numeric need projection, with 2021 as the submission year, projected out three years

¹ Washington State In-Home Services agencies license can include one or more services, including home care, home health, hospice, and hospice care centers. The lists of facilities within this workbook include only those agencies which include home health as one of their services. It may include agencies that provide one or more of the four services. Furthermore, an agency name with the words "home care," "home health," or "hospice" do not necessarily imply the level of service provided by the agency. If you have any questions or concerns regarding the inclusion of one or more listed agencies, please contact us.

² This list includes both CN-approved and state-licensed only home health agencies. Please note, while the department does count all agencies within a county, state-licensed only agencies are under no obligation to provide services across all counties listed on their license. In the event that the Department were to receive an application, the department would use survey data from responding home health providers within the service area and would use actual patient day volumes rather than the default 10,000 in the State Health Plan methodology. It should also be noted that state-licensed only agencies are NOT authorized to provide service to Medicare/Medicaid populations, regardless of the agency's certification status.

County: King

source: OFM "Projections of the Population by Age and Sex for Growth Management, 2017 GMA Projections - Medium Series"

Age	2010	2015	2020	2025	2030
Total	1,931,249	2,052,800	2,231,409	2,355,569	2,474,627
0-4	120,294	122,637	133,532	141,338	145,113
5-9	113,295	122,982	130,652	135,625	143,257
10-14	110,789	115,221	123,432	128,496	133,158
15-19	117,514	120,198	121,298	129,041	134,147
20-24	129,822	132,416	157,213	151,906	162,691
25-29	160,656	166,562	190,506	184,450	177,439
30-34	152,061	176,312	163,740	201,005	193,593
35-39	149,158	155,847	174,253	162,344	199,937
40-44	147,632	146,206	153,108	171,641	159,534
45-49	147,837	142,855	146,751	149,636	167,814
50-54	143,295	144,036	142,773	142,581	145,451
55-59	126,272	136,655	138,523	135,277	135,081
60-64	101,945	116,653	130,968	132,016	129,629
65-69	67,317	91,447	111,565	121,694	123,021
70-74	45,430	60,514	87,497	102,041	111,753
75-79	35,200	39,671	55,122	78,156	91,684
80-84	28,948	28,280	33,441	46,024	66,093
85+	33,784	34,306	37,035	42,298	55,232

Age	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
0-64	1,720,570	1,736,172	1,751,774	1,767,377	1,782,979	1,798,581	1,820,215	1,841,848	1,863,482	1,885,115	1,906,749	1,918,470	1,930,192	1,941,913	1,953,635	1,965,356
65-79	147,947	156,684	165,421	174,158	182,895	191,632	204,143	216,653	229,163	241,674	254,184	263,725	273,267	282,808	292,350	301,891
80+	62,732	62,703	62,674	62,645	62,616	62,586	64,164	65,742	67,320	68,898	70,476	74,045	77,614	81,184	84,753	88,322
Total	1,931,249	1,955,559	1,979,869	2,004,180	2,028,490	2,052,800	2,088,522	2,124,244	2,159,965	2,195,687	2,231,409	2,256,241	2,281,073	2,305,905	2,330,737	2,355,569

Home Health Methodology
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County: King

Agency	License Number	CN Approved
A and K Health Care Services LLC	IHS.FS.60844133	
Advanced Health Care	IHS.FS.00000206	
AdvisaCare	IHS.FS.00000156	
Agape Healthcare Services LLC	IHS.FS.60876117	
Amedisys Home Health	IHS.FS.61035006	
American Healthcare Services	IHS.FS.00000214	
Amicable Health Care	IHS.FS.00000215	Yes
A-One Home Care	IHS.FS.00000219	
Ashley House	IHS.FS.00000227	
Assured Home Health	IHS.FS.60497952	Yes
Atlas Home Health	IHS.FS.61117906	
Avail Home Health	IHS.FS.00000231	
Aveanna Healthcare	IHS.FS.00000452	
Bethany Home Health LLC	IHS.FS.60966822	
Brightstar Care	IHS.FS.60934498	
Brookdale Home Health	IHS.FS.60532952	Yes
Careage Home Health	IHS.FS.60007888	Yes
Careforce	IHS.FS.00000243	
CHI Franciscan Health at Home	IHS.FS.60506466	Yes
Childrens Country Home	IHS.FS.00000253	
Childress Nursing Services	IHS.FS.60959298	
Comfort of Care	IHS.FS.61105988	
Critical Nurse Staffing LLC	IHS.FS.60852239	
D.C.S. LLC	IHS.FS.60871359	
Day by Day Nursing Services	IHS.FS.60907239	
Eden Home Health	IHS.FS.60871865	Yes
Encore Home Health	IHS.FS.60922864	
Envision Home Health	IHS.FS.60521160	Yes
Estelita Su Homecare	IHS.FS.60542868	
Evergreen Health	IHS.FS.00000278	Yes
Everhome Healthcare	IHS.FS.00000184	
Family Resource Home Care	IHS.FS.60857773	
Fedelta Care Solutions	IHS.FS.61028960	
Goldencare Home Health Agency	IHS.FS.60720687	
Guardian Home Care	IHS.FS.60266397	
Harbor Health Solutions LLC	IHS.FS.60892797	
Haven Home Health Care	IHS.FS.61108148	Yes
Home Care by Wesley	IHS.FS.00000028	
Husky Senior Care	IHS.FS.60082962	
ICHS PACE at Legacy House	IHS.FS.60904213	
Infinity Homehealth Solutions Inc.	IHS.FS.60955703	
Journey Nursing Services	IHS.FS.61114400	
Judson Park	IHS.FS.60291296	
Kaiser Permanente Home Health and Hospice	IHS.FS.00000305	Yes
Kindred at Home	IHS.FS.00000293	
Kindred at Home	IHS.FS.00000295	
Kline Galland Community Based Services	IHS.FS.60103742	Yes
Light Within Home Health	IHS.FS.61143217	
Lucid Living	IHS.FS.61100446	
Maxim Healthcare Services	IHS.FS.00000375	
MultiCare Home Health, Hospice and Palliative Care	IHS.FS.60081744	Yes

Home Health Methodology
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Agency	License Number	CN Approved
Nuclear Care Partners LLC	IHS.FS.60670421	
Nursing Evolutions	IHS.FS.60318430	
PNW Pace Partners	IHS.FS.61160759	
Popes Kids Place	IHS.FS.60083889	
Precision Home Health	IHS.FS.61034384	
Professional Case Management of Washington LLC	IHS.FS.60474800	
Providence at Home	IHS.FS.61127868	
Providence Elder Place	IHS.FS.00000415	
Providence Home Services	IHS.FS.00000419	Yes
Puget Sound Home Health of King County	IHS.FS.60751653	Yes
Reliable Healthcare	IHS.FS.60851874	
Restoration Health Services	IHS.FS.61090653	
Right At Home	IHS.FS.00000096	
Ro Health	IHS.FS.60610351	
RWW Home and Community Rehab Services, Inc.	IHS.FS.60263077	
Sea Mar Home Health	IHS.FS.00000433	Yes
Seattle Childrens Hospital Home Care Services	IHS.FS.00000097	
Serengeti Care	IHS.FS.60660148	
Signature Healthcare at Home	IHS.FS.00000382	Yes
Signature Home Health	IHS.FS.00000220	Yes
Sofavi Home Health LLC	IHS.FS.60950400	
Sound Options	IHS.FS.60863143	
Total Home Health Care LLC	IHS.FS.61135506	
Transitions Care Management, LLC	IHS.FS.61057211	
Tulamore, Inc.	IHS.FS.61043336	
Universal Home Care LLC	IHS.FS.60631342	
Visions Home Health Care	IHS.FS.00000134	
Wellspring Home Health, LLC	IHS.FS.61055973	
Wesley Health and Homecare	IHS.FS.60276500	Yes
Wilderness Shores Nursing	IHS.FS.60055610	

Total Home Health Agencies Serving King County: 31
Total M/M Certified Serving King County: 18

Updated August 2021

County: King
Submission year: 2021
Years: 2022 -2024

2024	Age Cohort *	County Population *	SHP Formula	* Number of Visits =	Projected Number of Visits
	0-64	1,953,635	0.005	10	97,682
	65-79	292,350	0.044	14	180,087
	80+	84,753	0.183	21	325,705
				TOTAL:	603,474
			<i>Number of Expected Visits per Agency</i>		<i>10,000</i>
			Projected Number of Needed Agencies		60.35