



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
PO Box 47852 • Olympia, Washington 98504-7852

August 21, 2017

CERTIFIED MAIL # 7014 2120 0002 7589 9445

Steve Morris, CEO
Inspiring Hospice Partners of Oregon
Dba Heart of Hospice
2621 Wasco Street
Hood River, OR 97031

RE: Certificate of Need Application #17-10

Dear Mr. Morris:

We have completed review of the Certificate of Need application submitted by Inspiring Hospice Partners of Oregon dba Heart of Hospice proposing to establish a Medicare and Medicaid certified hospice agency in Klickitat County. Enclosed is a written evaluation of the application.

For the reasons stated in the enclosed decision, the application is consistent with the applicable criteria of the Certificate of Need Program, provided Inspiring Hospice Partners of Oregon agrees to the following in its entirety.

Project Description:

This certificate approves Inspiring Hospice Partners of Oregon dba Heart of Hospice, LLC to establish a Medicare and Medicaid certified hospice agency in Klickitat County. Services will include the following physician and clinical services, nursing care, medical equipment and supplies, symptoms control and pain relief management, hospital based short-term care, respite care, home health aide and homemaker services, physical and occupational therapy, social worker services, dietary counseling, grief and loss counseling. Hospice staff will be available 24/7 for emergencies.

Conditions:

1. Inspiring Hospice Partners of Oregon dba Heart of Hospice, LLC agrees with the project description as stated above. Inspiring Hospice Partners of Oregon dba Heart of Hospice, 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. Inspiring Hospice Partners of Oregon dba Heart of Hospice, LLC will maintain Medicare and Medicaid certification regardless of ownership.

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3. Inspiring Hospice Partners of Oregon dba Heart of Hospice, LLC will provide services throughout the entire Klickitat County service area.
4. Prior to providing services, Inspiring Hospice Partners of Oregon dba Heart of Hospice, LLC will provide a copy of an updated non-discrimination policy that is consistent with the policy statement as provided in the application but updated to reflect the appropriate agency contact person/Section 504 Coordinator.

Approved Costs:

The capital expenditure cost associated with this project is \$0.00

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

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

Send your written response to the Certificate of Need Program, at one of the following addresses.

Mailing Address:

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

Physical Address:

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

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

Sincerely,



Steve Bowman, PhD, MHA
Director, Office of Community Health Systems

Enclosure



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DEPARTMENT OF HEALTH
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Director, Office of Community Health Systems

Enclosure

**EVALUATION DATED AUGUST 21,2017 OF THE CERTIFICATE OF NEED
APPLICATION SUBMITTED BY INSPIRING HOSPICE PARTNERS OF OREGON DBA
HEART OF HOSPICE PROPOSING TO ESTABLISH A MEDICARE AND MEDICAID
CERTIFIED HOSPICE AGENCY IN KLICKITAT COUNTY**

APPLICANT DESCRIPTION

Inspiring Hospice Partners of Oregon dba Heart of Hospice, LLC (Heart of Hospice) is a Limited Liability Corporation and all members and shareholders are employees of the company. Heart of Hospice is located at 2621 Wasco Street in Hood River, OR 97031. Heart of Hospice is an existing Medicare certified hospice agency that is CN authorized to provide Medicare/Medicaid hospice services in Skamania County. It also is currently a licensed only hospice agency serving Klickitat County. Under WAC 246-310-020(1)(a)(ii), a hospice agency is required to obtain a CN as a new hospice agency, if it expanding its services on a regular and ongoing basis. Heart of Hospice has been providing some Medicare/Medicaid services in Klickitat County on an intermittent basis and after receiving approval from the CN program. [Source: Screening responses received February 24, 2017, pages 12-13 and attachments and Historic Certificate of Need record.]

PROJECT DESCRIPTION

Heart of Hospice is proposing to provide Medicare and Medicaid certified hospice care services to the residents of Klickitat County on a regular and ongoing basis. They state that currently Klickitat County does not have a qualified Medicare and Medicaid certified hospice provider approved to provide services to residents throughout Klickitat County. [Source: Application pages 4 and 9] With this application, Heart of Hospice will be co-located with the previously approved hospice agency serving Skamania County located at 2621 Wasco Street in Hood River, Oregon 97031. [Source: Application, page 6 and pages 67-82]

Under the Medicare payment system, hospice care benefit consist of the following services physician and clinical services, nursing care, medical equipment and supplies, symptoms control and pain relief management, hospital based short-term care, respite care, home health aide and homemaker services, physical and occupational therapy, social worker services, dietary counseling, grief and loss counseling. Respite care and outpatient drugs are each subject to a small co-payment and other services are covered in full¹. Hospice staff would be available 24/7 for emergencies. There is no capital expenditure associated with the establishment the hospice agency. [Source: Screening responses received February 24, 2017, page 7 and 14]

If this project is approved, Heart of Hospice expects that Medicare and Medicaid hospice services would be available in January 2018. Under this timeline, Heart of Hospice's first full calendar year of operation as a Medicare certified hospice agency is expected to be year 2018 and the third year of operation is year 2020. For ease of reference, the department will refer to the Inspiring Hospice Partners of Oregon dba Heart of Hospice, LLC as "Heart of Hospice".

¹ Medicare Hospice Benefits, p. 8 Centers for Medicare & Medicaid Services. CMS Product No. 02154, Revised April 2017.

APPLICABILITY OF CERTIFICATE OF NEED LAW

This project is subject to review under Revised Code of Washington 70.38.105(4)(a) and Washington Administrative Code 246-310-020(1)(a)² as the establishment of a new healthcare facility.

EVALUATION CRITERIA

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

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

(a) In the use of criteria for making the required determinations, the department shall consider:

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

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

“The department may consider any of the following in its use of criteria for making the required determinations:

- (i) Nationally recognized standards from professional organizations;*
- (ii) Standards developed by professional organizations in Washington State;*
- (iii) Federal Medicare and Medicaid certification requirements;*
- (iv) State licensing requirements;*
- (v) Applicable standards developed by other individuals, groups, or organizations with recognized expertise related to a proposed undertaking; and*
- (vi) The written findings and recommendations of individuals, groups, or organizations with recognized expertise related to a proposed undertaking, with whom the department consults during the review of an application.”*

WAC 246-310-290 contains service or facility specific criteria for hospice projects and must be used to make the required determinations. To obtain Certificate of Need approval, the applicant must demonstrate compliance with the applicable criteria found in WAC 246-310-210 (need); 246-310-220 (financial feasibility); 246-310-230 (structure and process of care); 246-310-240 (cost containment); and WAC 246-310-290 (hospice standards and forecasting method).

TYPE OF REVIEW

As directed under WAC 246-310-290(3), the department accepted this project under the 2016 hospice agency concurrent review. The concurrent review process promotes the expressed public policy goal of

² WAC 246-310-020(1)(a)(ii) states *“The provision of services by a home health agency or hospice to a county, on a regular and ongoing basis, that was not previously included in the home health agency or hospice service area shall be considered the development of a new home health agency or hospice”*

RCW 70.38 that the development or expansion of health care services is accomplished in a planned, orderly fashion and without unnecessary duplication. For hospice services, concurrent review allows the department to review applications proposing to serve the same planning area as defined in WAC 246-310-290 and simultaneously to reach a decision that serves the best interests of the planning area's residents. The new hospice services would be provided in the Klickitat County hospice planning area.³ No other hospice applications were submitted for the Klickitat County planning area during the 2016 review cycle. Therefore, as allowed under WAC 246-310-290(5), this application was converted to a regular review. A chronologic summary of the review is summarized below.

APPLICATION CHRONOLOGY

Action	Heart of Hospice
Letter of Intent Submitted	September 28, 2016
Application Submitted	October 31, 2016
Department's Pre-review Activities including <ul style="list-style-type: none"> • DOH 1st Screening Letter • Applicant's 1st Screening Responses Received⁴ • DOH 2nd Screening Letter • Applicant's 2nd Screening Responses Received⁵ 	November 30, 2016 February 24, 2017 March 17, 2017 May 5, 2017
Beginning of Review	May 17, 2017
End of Public Comment <ul style="list-style-type: none"> • Public comments accepted through • Public hearing conducted⁶ • Rebuttal Comments Received⁷ 	June 21, 2017 N/A N/A
Department's Anticipated Decision Date	August 21, 2017
Department's Actual Decision Date	August 21, 2017

AFFECTED PERSONS

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

"...an *"interested person"* who:

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

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

- (a) *The applicant;*
- (b) *Health care facilities and health maintenance organizations providing services similar to the services under review and located in the health service area;*
- (c) *Third-party payers reimbursing health care facilities in the health service area;*

³ Hospice rules adopted in April 2003 identify the individual counties as the smallest planning or service area for hospice. Klickitat County, as a whole, is a single hospice planning area.

⁴ The applicant requested 45 days extension to submit screening responses.

⁵ On April 7, 2017 the department mailed supplemental information to the applicant related to ownership and extends screening responses due date until May 8, 2017

⁶ The department did not conduct a hearing

⁷ The department received five letters of support and no opposition letter therefore, the applicant chose not provide rebuttal comments

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

Providence Health & Services

Providence Health & Services-Oregon operates a hospice agency, located in Hood River, Oregon, which is CN approve to serve residents of west Klickitat and east Skamania counties⁸. Providence Health & Services asked to be informed of the department’s decision. Providence Health & Services meets the definition of an “interested person” under WAC 246-310-010(34). Providence however, did not provide any public comment. Therefore, Providence does not qualify as an “affected person” for this application.

SOURCE INFORMATION REVIEWED

- Inspiring Hospice Partners of Oregon dba Heart of Hospice, LLC Certificate of Need application received October 31, 2016
- Inspiring Hospice Partners of Oregon dba Heart of Hospice, LLC first screening responses received February 24, 2017
- Inspiring Hospice Partners of Oregon dba Heart of Hospice, LLC second screening responses received May 5, 2017.
- Department of Health’s 2015-2016 Hospice Need Methodology
- Department of Health's Integrated Licensing and Regulatory System [ILRS] compliance data
- Medical Quality Assurance Commission compliance history for credentialed or licensed staff
- Washington State Secretary of State website at www.sos.wa.gov
- Washington State Department of Revenue website at www.dor.wa.gov
- Center for Medicare and Medicaid Services website at www.medicare.gov
- National Hospice and Palliative Care Organization at www.nhpco.org
- Licensing data provided by the Medical Quality Assurance Commission, Nursing Quality Assurance Commission, and Health Systems Quality Assurance Office of Customer Service
- Certificate of Need Historical files

⁸ On November 8, 1993, CN#1098 was issued to Hospice of Hood River approving the entity to establish a Medicare and Medicaid certified hospice agency to serve the residents of West Klickitat and East Skamania counties. On October 27, 2010, Hospice of the Gorge (formerly Hospice of Hood River) notified the Certificate of Need Program that it has been acquired by Providence Health & Services-Oregon. [Source: CN historical files]

CONCLUSION

For the reasons stated in this evaluation, the application submitted by Inspiring Hospice Partners of Oregon dba Heart of Hospice, LLC proposing to establish a Medicare and Medicaid certified hospice agency in Klickitat County is consistent with applicable criteria of the Certificate of Need Program, provided Inspiring Hospice Partners of Oregon dba Heart of Hospice, LLC agrees to the following in its entirety.

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Approved Costs:

The capital expenditure cost associated with this project is \$0.00

CRITERIA DETERMINATIONS

A. Need (WAC 246-310-210) and Hospice Services Standards and Need Forecasting Methodology (WAC 246-310-290)

Based on the source information reviewed and the applicant's agreement to the conditions identified in the conclusion section of this evaluation, the department determines that Inspiring Hospice Partners of Oregon dba Heart of Hospice, LLC has met the applicable need criteria in WAC 246-310-210 and WAC 246-310-290.

- (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 246-310-290(7)-Hospice Agency Numeric Methodology

The Department of Health's Certificate of Need Program uses the numeric methodology outlined in WAC 246-310-290 for determining the need for additional hospice agencies in Washington State. The methodology is a six-step process of information gathering and mathematical computation. The first step examines historical hospice utilization rates at the statewide level. The remaining five steps apply that utilization to current and future populations at the service area level and are intended to determine total baseline hospice services need and compare that need to the capacity of existing providers. The completed methodology is presented as Appendix A attached to this evaluation.

Heart of Hospice-Numeric Methodology

Heart of Hospice did not calculate its own numeric need using the projection method in WAC 246-310-290. Instead, it relied on the department's 2016-2017 Hospice Numeric Need Methodology released August 2015. A copy of the department's methodology was included in the application.

Public Comments

- None

Rebuttal Comments

- None

Department Evaluation-Numeric Methodology

Each year, prior to the Letter of Intent period for the annual hospice concurrent review cycle, the department produces and posts to its website the projected hospice need, by county, that will be used in the upcoming review cycle. For this evaluation, the 2016-2017 numeric methodology will be used. This portion of the evaluation will describe, in summary, the calculations made at each step and the assumptions and changes made in that process. The titles for each step are excerpted from WAC. The completed methodology is presented as an appendix to this evaluation.

Step 1: Calculate the following four statewide predicted hospice use rates using CMS and department of health data or other available sources.

- (i) *The predicted percentage of cancer patients sixty-five and over who will use hospice services. This percentage is calculated by dividing the average number of hospice admissions over the last three years for patients the age of sixty-five and over with cancer by the average number of past three years statewide total deaths sixty-five and over from cancer.*

- (ii) *The predicted percentage of cancer patients under sixty-five who will use hospice services. This percentage is calculated by dividing the average number of hospice admissions over the last three years for patients under the age of sixty-five with cancer by the current statewide total of deaths under sixty-five with cancer.*
- (iii) *The predicted percentage of non-cancer patients sixty-five and over who will use hospice services. This percentage is calculated by dividing the average number of hospice admissions over the last three years for patients age sixty-five and over with diagnoses other than cancer by the current statewide total of deaths over sixty-five with diagnoses other than cancer.*
- (iv) *The predicted percentage of non-cancer patients under sixty-five who will use hospice services. This percentage is calculated by dividing the average number of hospice admissions over the last three years for patients under the age of sixty-five with diagnoses other than cancer by the current statewide total of deaths under sixty-five with diagnoses other than cancer.*

For these sub-steps within Step 1, the department obtained utilization data for 2013 through 2015 from the licensed and Certificate of Need approved hospice providers throughout the state. The department asked providers to report their admissions by age group (under 65 and 65 and over) and diagnosis (cancer/non-cancer) for each of the most recent three years. This information is provided by county of residence. The results of this survey were compared with data provided by the Department of Health's Center for Health Statistics and Cancer Registry office to determine the percentages of deaths due to cancer and non-cancer causes for the two age groups.

Step 2: Calculate the average number of total resident deaths over the last three years for each planning area.

This step was completed using death statistics from the Department of Health's Center for Health Statistics. The total deaths in each of the planning areas for 2013-2015 were averaged for each planning area.⁹

Step 3: Multiply each hospice use rate determined in Step 1 by the planning area's average total resident deaths determined in Step 2.

In this step, the use rates from Step 1 are multiplied by the applicable age group's death rate for each planning area to determine the number of likely hospice patients for each of the four age/diagnosis categories.

Step 4: Add the four subtotals derived in Step 3 to project the potential volume of hospice services in each planning area.

The numbers of likely hospice patients from each of the four categories derived in Step 3 are added together for each planning area. This number is described as the "potential volume" of hospice services in the area. This represents the number of patients expected to elect hospice services in the area.

⁹ In applying Step 2, the department reads "total" to mean the total number of death for each of the four categories of patients identified in Step 1. The department adopts this reading because the various steps in the methodology build on each other and should be read together.

Step 5: Inflate the potential volume of hospice service by the one-year estimated population growth (using OFM data).

The values derived in Step 4, above, were inflated by the expected populations for each planning area. The age-specific population projections for each county were obtained from the state’s Office of Financial Management. The most recent age-specific data set is the “Population Projections developed for Growth Management Act medium series: 2010-2040 by single year. The department applied the one-year estimated population growth to the potential volume of hospice services derived in Step 4 to estimate potential hospice volume in 2016, the first year following the three-year data range.

Step 6: Subtract the current hospice capacity in each planning area from the above projected volume of hospice services to determine unmet need. Determine the number of hospice agencies in the proposed planning area which could support the unmet need with an ADC [average daily census] of thirty-five.

Current hospice capacity is defined in the rule as the average number of admissions for the most recent three years of operation for those agencies that have operated or have been approved to operate in the planning area for three years or more. For the remaining agencies that have not operated in the planning area for at least three years, an average daily census (ADC) of thirty-five is assumed for that agency.

In order to provide a numeric need methodology as described above, data from existing Washington State hospice providers must be obtained. On April 27, 2015, the department conducted its annual survey of agencies that provide hospice services in Washington State. Providence Health & Services-Oregon and Klickitat County Public Hospital District No. 1 dba Klickitat Valley Home Health & Hospice (KVHH&H) are the only Medicare and Medicaid certified hospice agencies serving Klickitat County. Providence Hospice is CN approved to serve the residents of West Klickitat and East Skamania counties. KVHH&H is owned and operated by Klickitat County Public Hospital District No. 1 is a critical access hospital. KVHH&H provides hospice services primarily to residents that live within its district boundary.

The department calculated the ADC for each hospice agency by multiplying the state’s most recent average length of stay (ALOS), calculated from responses to the agency’s survey, by each hospice agency’s average admissions for the past three years and divided that total by 365 (days per year). The result of this calculation shows a minimal unmet need for Klickitat County. The unmet need is divided by the minimum ADC of 35. The calculations and result for years 2016 through 2019 is shown in the table below.

**Table 1
Klickitat County Hospice Methodology Summary for Years 2016- 2019**

	Year 2016	Year 2017	Year 2018	Year 2019
Unmet Need for Patients Days	666	685	717	732
Unmet Patient Days divided by 365	2	2	2	2
Number of Agencies Needed (subtract 35)	0	0	0	0

In conclusion, the numeric methodology is a population-based assessment used to determine the projected need for hospice services in a county (planning area). Based solely on the numeric

methodology applied by the department there is no need for an additional hospice agency in Klickitat County. However, Heart of Hospice is asking for an exception to the numeric method to serve all residents in Klickitat County. That request will be evaluated as part of the department’s assessment of whether the existing hospice providers are sufficiently available and accessible in the next section of the need analysis and the financial feasibility section of this analysis.

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

Heart of Hospice

- “... *Proposing to serve a County without an existing operational Medicare Certified Program that is currently and completely serving the entire county of Klickitat. We have continued to fill the gap of the two agencies who are not fully serving the county. As you are aware Klickitat County is a large county that runs along the Columbia River. Heart of Hospice has fully committed to serving this entire county that is connected to Stevenson County, Hood River County, and Wasco County, being that we currently serve hospice patients in all these surrounding counties including Klickitat County...*” [Source: Screening responses received May 5, 2017]
- “*Klickitat Valley Hospital based out of Goldendale Washington provides hospice services to very few individuals outside of Goldendale Washington. This hospital based program has depended on us to provide hospice care to the beneficiaries outside of their reach.*”
- *Hospice of the Gorge (Providence Hospital). This hospital based program has also reached out to us to serve the beneficiary whom outside of their scope of reach*”. [Source: Screening responses received February 24, 2017]
- *We are seeking approval for Klickitat County because the residents are having to wait for the communication from the State prior to receiving their hospice benefit. The approval of this project will allow for us to serve the residents of Klickitat without explaining to them that we must wait for approval from the state each time...Many of these residents have been referred to both KVH and Providence Hospice...these families have had to wait to discover that neither one of these program is going to serve them...*” [Source: Screening responses received February 24, 2017, page 21]
- “*Our projection methodology for Klickitat County parallels the methodology in WAC 246-310-290 as applied to Klickitat County. In summary, the methodology projects 36 Klickitat County patients will seek hospice care in 2017. Assuming an ALOS of 60 days, and a 50% market share, we project the followings census:*

Reproduced

	Klickitat 2017	Klickitat 2018	Klickitat 2019
<i>Total # of Patients</i>	87	87	88
<i>Patients Served by HOH Market (at50% share)</i>	43	43	43
<i>ALOS</i>	60	60	60
<i>ADC</i>	3	3	3

Reproduced

Diagnosis	Estimated Percent	2017	2018	2019
Total Patients		43	43	44
<i>Cancer</i>	33%	14	14	9
<i>AIDS</i>	0%	0	0	0
<i>ALS</i>	6%	3	3	3
<i>Heart/Cardiac</i>	22%	10	10	10
<i>Alzheimer's</i>	17%	6	6	6
<i>Pulmonary</i>	22%	10	10	10
Total	100%			

- *The quantities methodology used in the table above is based on 2016-2017 Department of Health Hospice Numeric Need Methodology released August 2016. We assume we will care for 50% of the hospice patient population. The percentage for each diagnosis is provided in the table”. [Source: Screening responses received February 24, 2017, page 12]*
 - a. *“According to the exemption language in WAC246-310-290(6) An application projecting an ADC under thirty-five patients may be approved if the applicant:

 - i. *Commits to serve one or maintain Medicare certification*
 - ii. *Commit to serve one or more counties that do not have any Medicare certified providers and*
 - iii. *Can document overall financial feasibility**
 - b. *Heart of Hospice is absolutely committed to maintain Medicare Certification, we are proposing to serve a County without an existing operational Medical Certified Program that is currently and completely serving the entire county of Klickitat. We have continued to fill the gap of the two agencies who are not fully serving the county. As you are aware Klickitat County is a large county that runs along the Columbia River. Heart of Hospice has fully committed to serving this entire county that is connected to Stevenson County, Hood River County, and Wasco County, being that we currently serve hospice patients in all these surrounding counties including Klickitat County we have continued to prove Overall Financial Feasibility. For all of these reasons we have proposed to serve Klickitat County but most importantly approving Klickitat County would allow for us to continue to provide Continuity of Care to our patients who often move from Oregon to Klickitat County for family care reasons. For the majority of the residents of Klickitat County they seek medical care and treatments in Oregon where we also fully serve our providers. It would be unjust to the Community we serve to not allow for Heart of Hospice to provide”. [Source: Screening responses received May 5, 2017]*

Public Comments

- *“...I’m writing in reference to support and declare the need of Heart of Hospice care in this county.” [Source: Support letter received June 16, 2017 from Barbara Johnston]*
- *“...Please help us by keeping them available to us at Klickitat County. They are much needed.” [Source: Support letter received June 16, 2017 from Betty Graves, Dallesport, WA.]*

- “The day after we arrived home, we received a phone call from a woman identifying herself as a case-worker for Klickitat Valley Hospital Hospice. She spoke with us for a few minutes and then hung up. The next day, (two days after his release from the Portland hospital) a nurse came to our home, took my husband’s vitals and asked if there was anything else we needed. When we said no, she left. I never saw or heard from anybody at KVH Hospice again...To deny the families of Klickitat County, the care offered by Heart of Hospice would be a severe disservice to them.” [Source: Support letter received June 13, 2017 from Michele Stanley, Roosevelt, WA]

Rebuttal Comments

- None

Department’s Evaluation

Heart of Hospice acknowledges that the numeric methodology alone does not support the approval of another Medicare/Medicaid certified hospice agency serving Klickitat County. However, they are seeking approval under the exception language found in WAC 246-310-290(6). WAC 246-310-290(6) states:

“Hospice agencies applying for a certificate of need must demonstrate that they can meet a minimum average daily census (ADC) of thirty-five patients by the third year of operation. An application projecting an ADC of under thirty-five patients may be approved if the applicant:

- (a) Commits to maintain Medicare certification;*
- (b) Commits to serve one or more counties that do not have any Medicare certified Providers; and*
- (c) Can document overall financial feasibility.”*

As part of the department’s analysis this criteria, the department assess the reasonableness of the applicant’s volume projections. As an existing hospice provider, the department first looked at Heart of Hospice’s historic utilization data to determine if volumes projected are reasonable.

DoH staff reproduction the table provided by Heart of Hospice of its historical utilization. That table is below. [Source: Screening responses received February 24, 2017, page 6]

***Reproduced
Heart of Hospice Historical Utilization***

<i>Oregon Hospice Patients</i>	<i>2016 OR</i>	<i>2015 OR</i>	<i>2014 OR</i>	<i>2013 OR</i>
<i>Total# of unduplicated hospice patients</i>	<i>181</i>	<i>187</i>	<i>195</i>	<i>169</i>
<i>Average length of stay</i>	<i>174</i>	<i>159</i>	<i>212</i>	<i>197</i>
<i>Median length of stay</i>	<i>35</i>	<i>28</i>	<i>40</i>	<i>52</i>
<i>Average daily census</i>	<i>45</i>	<i>42</i>	<i>41</i>	<i>44</i>
<i>Washington Hospice Patients</i>	<i>2016 WA</i>	<i>2015 WA</i>	<i>2014 WA</i>	<i>2013 WA</i>
<i>Total # of unduplicated hospice patients</i>	<i>57</i>	<i>38</i>	<i>47</i>	<i>34</i>
<i>Average length of stay</i>	<i>106</i>	<i>111</i>	<i>88</i>	<i>141</i>
<i>Median length of stay</i>	<i>31</i>	<i>36</i>	<i>25</i>	<i>22</i>
<i>Average daily census</i>	<i>13</i>	<i>7</i>	<i>9</i>	<i>6</i>

From the table above, it shows that the applicant projected volumes are consistent with historic utilization. As noted in the reproduce table on page 9, Heart of Hospice does not project to meet the ADC of 35 in Klickitat County. However, the agency as a whole has had an ADC greater than 35. The department concludes Heart of Hospice's projected patient volumes are reasonable.

As part of its evaluation, the department must also evaluate whether the existing hospice providers are sufficiently available and accessible in the Klickitat service area. The department assessed the status of the hospice agencies serving Klickitat County. Klickitat County has two CN approved Medicare and Medicaid certified providers. However, neither provider services to the entire county. Providence Hospice is CN approved to serve patients in west Klickitat and east Skamania counties. The department's records show that on November 8, 1993, CN#1098 was issued to Hospice of Hood River approving the entity to establish a Medicare and Medicaid certified hospice agency to serve the residents of West Klickitat and East Skamania counties. On October 27, 2010, Hospice of the Gorge (formerly Hospice of Hood River) notified the Certificate of Need Program that it had been acquired by Providence Health & Services-Oregon. Attached to the notification letter were copies of the articles of the merger between Hospice of Hood River and Providence Health & Services. [Source: CN historical files] On July 27, 2005, the department issued CN#1314 to Klickitat County Public Hospital District No. 1 to establish a Medicare and Medicaid certified hospice agency to serve the residents of Klickitat County. The department's records show that KVHH&H does not provide hospice services to all residents of Klickitat County. KVHH&H as a public district hospital, provides hospice services to residents that live within its district boundary.

The department's record shows that at least six occasions, the most recent on December 19, 2016, Heart of Hospice sought and received permission to provide services to a patient in Klickitat County. [Source: Screening responses received February 24, 2017, page 12 - 13] This demonstrates that residents of Klickitat County are able to obtain services from the existing providers.

Based on the assessment above, the department conclude that existing Klickitat County does not have a hospice agency CN approved to serve the entire service area. The department further concludes that the existing hospice agencies serving Klickitat County are not sufficiently available and accessible. Consistent with the department's past 2008 decision for Skamania County, the department concludes, sub-criterion (b) of the exemption criterion is met.

Based on the information reviewed, the department concludes need for an additional hospice agency in Klickitat County has been demonstrated. **This sub-criterion is met.**

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

To evaluate this sub-criterion, the department evaluates an applicant's admission policies, willingness to serve Medicare and Medicaid patients, and to serve patients that cannot afford to pay for services. The admission policy provides the overall guiding principles of the facility as to the types of patients that are appropriate candidates to use the facility and assurances regarding access to treatment. The admission policy must also include language to ensure all residents of the planning area would have access to the proposed services. This is accomplished by providing an admission policy that states patients would be admitted without regard to race, ethnicity, national origin, age, sex, pre-existing condition, physical, or mental status.

Medicare certification is a measure of an agency’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 do and therefore more likely to be on Medicare longer.

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

A facility’s charity care policy should show a willingness of a provider to provide services to patients 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 (ACA), the amount of charity care is expected to decrease, but not disappear.

Heart of Hospice

- *“Inspiring Hospice Partners admission policies prohibit the discrimination on the basis of race, income, ethnicity, sex or handicap. A copy of our admission is included as Exhibit 2”.* [Source: Application Exhibit 2 and Screening responses received February 5, 2017, page 17]
- *“All individuals in need of, and electing to choose, hospice services will be served by this project. Inspiring Hospice Partners admission policy is included in Exhibit 2.”* [Source: Screening responses received February 5, 2017, page 10]
- DoH staff reproduction of Inspiring Hospice historical and projected sources of revenue based on screening responses. [Source: Screening responses received February 24, 2017, page 17]

<i>Medicare</i>	<i>83%</i>
<i>Medicaid</i>	<i>13%</i>
<i>Private</i>	<i>4%</i>

- *“Heart of Hospice-Charity Care policy”* [Source: Application, page 167]

Public Comments

- None

Rebuttal Comments

- None

Department Evaluation

The Access to Hospice Care, Admission Orders and Admission to Hospice Care policies provided by Heart of Hospice outlines the process and criteria it uses to admit patients for services and ensures that patients will receive appropriate care. The non-discrimination policy provided gave the name of a contact person who is no longer part of Heart of Hospice or the present organization. Therefore, if this project is approved, the department would attach a condition requiring Heart of Hospice to provide a copy of an updated non-discrimination policy that is consistent with the policy statement as provided in the application but updated to reflect the appropriate agency contact person/Section 504 Coordinator.

Heart of Hospice is certified to provide services to Medicare and Medicaid patients in Oregon and in Skamania County in Washington. Information provided in the application shows Heart of Hospice expects reimbursements from Medicare and Medicaid and the applicant stated it will continue to maintain its Medicare and Medicaid certification. [Sources: Application page 5 Exhibit 2 and

Screening responses received May 5, 2017] Heart of Hospice meets the Medicare certification commitment criteria identified in the numeric need exception criteria.

Heart of Hospice provided a copy of its Charity Care policy. The policy outlines who is eligible for charity care. It also outlines the procedure used. The department review of Heart of Hospice's pro forma financial statement, shows it included a 'charity care' line item as a deduction from expenses.

Based on the source document reviewed and the applicant agreement to the conditions identified in the "conclusion" section of this evaluation, the department concludes **this sub-criterion is met.**

(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.

Department Evaluation

This sub-criterion is not applicable to the application.

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

Department Evaluation

This sub-criterion is not applicable to the application.

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

Department Evaluation

This sub-criterion is not applicable to the application.

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

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

Department Evaluation

This sub-criterion is not applicable to the application.

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

Department Evaluation

This sub-criterion is not applicable to the application.

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

Department Evaluation

This sub-criterion is not applicable to the application.

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

Based on the source information reviewed and the applicant's agreement to the conditions identified in the conclusion section of this evaluation, the department determines that Inspiring Hospice Partners of Oregon dba Heart of Hospice, LLC has met 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 does not contain specific WAC 246-310-220(1) financial feasibility criteria as identified in WAC 246-310-200(2)(a)(i). There are also no known recognized standards as identified in WAC 246-310-200(2)(a)(ii) and (b) that directs what the operating revenues and expenses should be for a project of this type and size. Therefore, using its experience and expertise the department evaluates if the applicant's pro forma income statements reasonably project the proposed project is meeting its immediate and long-range capital and operating costs by the end of the third complete year of operation.

Heart of Hospice

- *"We are fully operational and this project will not add any additional cost*
- *Gross revenue based on a blended average of Medicare, Medicaid, and Private 3rd Party Insurance reimbursement of \$186 per day in 2017.*
- *A 5% deduction from Gross Revenue is assumed for billing adjustment and charitable care support are based upon current levels, additional staffing as ADC increases. Payroll taxes and benefits are directly tied to staffing and wages.*
- *Medical supplies, drugs and DME are based upon a review of over 100 Hospice 990 IRS reports, other CN application, and our history. While these costs per patient's day normally decrease with volume, in an effort to be conservative, we have held them flat. These are approximately \$24 per day per patient.*
- *Other Expenses were also held flat at approximately \$6 per day per patient.*
- *Office Expenses were also held flat at approximately \$3 per day per patient.*
- *State and local tax is Washington B&O at current rates.*
- *Heart of Hospice Foundation is a non-profit Foundation which Heart of Hospice supports. The amount provided is discretionary and can increase or decrease as necessary for Heart of Hospice to remain financially viable. The amount shown is the budgeted level of support.*
- *Rent is the current office space.*

- *The financials assume that Heart of Hospice can leverage its current Oregon and Washington infrastructure and costs to also support service in Klickitat Count, with limited growth in administrative cost and fixed overhead as the Average Daily Census increases.*
- *Attached you will find our actual P&L. These numbers are exact as printed. We have been operating hospice for over 10 years and know that the revenue and expense will remain the same as we have already been serving these residents.* [Source: Screening responses received February 24, 2017, page 15]
- *“See attached with the addition and correction of the pro forma.”* [Source: Screening responses received May 5, 2017]
- DoH staff reproduction of Heart of Hospice Profit and Loss financial statement based on screening responses. [Source: Screening responses received May 5, 2017]

**Reproduced
Heart of Hospice P &L Year 2017-2020**

	Year 2017	Year 2018	Year 2019	Year 2020
Unduplicated census	43	43	44	44
ALOS	60	60	60	60
#of Patient Days	360	360	360	360
ADC	3.0	3.0	3.0	3.0
Net Revenue	\$871,687	\$871,687	\$888,354	\$905,021
Total Expenses	\$783,852	\$783,752	\$798,840	\$813,828
Net Income	\$87,834	\$87,934	\$89,514	\$91,193
Revenue per patient day	\$2,421.36	\$2,421.35	\$2,467.65	\$2,513.95
Expenses per patient day	\$2,177.37	\$2,177.05	\$2,219.00	\$2,260.63
Profit per patient day	\$243.98	\$244.26	\$248.65	\$253.31

- *“See attached assets, liabilities, and net worth”.* [Source: Screening responses received May 5, 2017]

Heart of Hospice Balance Sheet Year 2017

Assets		Liabilities	
Current Assets	\$134,696	Current Liabilities	\$2,191
Fixed Assets	-	Other equity	-
Other Assets	\$271,146	Equity	\$403,651
Total Assets	\$405,842	Total Liabilities and Equity	\$405,842

Public Comments

- None

Rebuttal Comments

- None

Department Evaluation

Heart of Hospice expects Medicare and Medicaid hospice services would be available in January 2018. [Source: Supplemental information, received May 5, 2017] Under this timeline, Heart of Hospice’s first full calendar year of operation as a Medicare certified hospice agency is expected to be year 2018 and the third year of operation is year 2020. [Source: Supplemental information received May 10, 2017] Summarized in Table 2 below is Heart of Hospice pro forma revenue and expense statement for the project.

Table 2
Heart of Hospice Projected Revenue and Expense Years 2017-2020

	Year 2017	Year 2018	Year 2019	Year 2020
Net Revenue	\$871,687	\$871,687	\$888,354	\$905,021
Total Expenses	\$783,852	\$783,752	\$798,840	\$813,828
Net Profit / (Loss)	\$87,852	\$87,934	\$89,514	\$91,193

The “Total Expenses” line item includes salaries and wages & benefits, lease costs. As shown above, Heart of Hospice anticipates Certificate of Need approval will contribute to profitability over time, as services are able to expand. Dr. Sonia Scheumann, MD was identified as the medical director of the hospice agency. This position is an independent contractor. A copy of the Medical Director’s executed contract was included in the application. The term of the contract is one year with automatic renewals unless specifically terminated. The costs were also identified in the executed contract. [Source: Application page 137-140 and screening responses received May 5, 2017].

As noted earlier in this evaluation, Heart of Hospice, is requesting approval of this project under the exception language of WAC 24-310-290(6). The department concluded in the Need section of this analysis, Heart of Hospice met the applicable access criteria of the exception. Based on the above analysis of Heart of Hospice’s financial statements, the department concludes Heart of Hospice meets the financial feasibility criteria identified in the exception criteria.

Heart of Hospice is located at 2621 Wasco Street in the City of Hood River, Oregon and facility currently leases office space from VOAG Ventures, LLC. Heart of Hospice provided an executed lease agreement between VOAG Ventures, LLC (Landlord) and Heart of Hospice, LLC (Tennant). [Source: Application page 67-189] The initial lease was executed in October 2012 and updated and expires in October 2017. Heart of Hospice has the right or option to extend the lease for two additional period of two years each. The executed lease agreement outlines the roles and responsibilities of the lessor and lessee.

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

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

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

Heart of Hospice

- “The estimated capital expenditure is ZERO for this project. We are fully operational and this project will not add any additional cost.” [Source: Screening responses received February 24, 2017, page 14]

- *“ZERO, we are fully operational and this project will not add any additional cost.”* [Source: Screening responses received February 24, 2017, page 14]
- *“This project involves no new construction or capital expenditure”.* [Source: Screening responses received February 24, 2017, page 16]

Public Comments

- None

Rebuttal Comments

- None

Department Evaluation

Heart of Hospice is an existing Medicare certified hospice agency that is CN authorized to provide Medicare/Medicaid hospice services in Skamania County. Heart of Hospice also is currently a licensed only hospice agency serving Klickitat County. Under WAC 246-310-020(1)(a)(ii), a hospice agency is required to obtain a CN as a new hospice agency, if it expanding its services on a regular and ongoing basis. As noted in the need section of this analysis, Heart of Hospice has been providing some Medicare/Medicaid services in Klickitat County on an intermittent basis and after receiving approval from the CN program. There is no construction associated with this project and the applicant did not anticipate buying any equipment. The cost to provide services in Klickitat County is included in the projected operating revenue and expenses statement. As shown in the revenue and expense statement, adding Klickitat County is not expected to have a significant impact. CN approval to provide hospice services in Klickitat County on a regular and ongoing basis is not expected to have an unreasonable impact on the costs and charges of healthcare services in the planning area. Based on the information, the department concludes **this sub criterion is met.**

(3) *The project can be appropriately financed.*

WAC 246-310 does not contain specific source of financing criteria as identified in WAC 246-310-200(2)(a)(i). There are also no known recognized standards as identified in WAC 246-310-200(2)(a)(ii) and (b) that directs how a project of this type and size should be financed. Therefore, using its experience and expertise the department compared the proposed project’s source of financing to those previously considered by the department.

Heart of Hospice

- *“The estimated capital expenditure is ZERO for this project. We are fully operational and this project will not add any additional cost.”* [Source: Application, page 13, Screening responses received February 24, 2017 page 14]
- *“This project involves no new construction or capital expenditures.”* [Source: Application, page 14]

Public Comments

- None

Rebuttal Comments

- None

Department Evaluation

Heart of Hospice is already operational. There are no capital expenditures associated with this project. The department concludes **this sub criterion is met.**

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

Based on the source information reviewed and the applicant’s agreement to the conditions identified in the conclusion section of this evaluation, the department determines that Inspiring Hospice Partners of Oregon dba Heart of Hospice, LLC has met 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 does not contain specific WAC 246-310-230(1) criteria as identified in WAC 246-310-200(2)(a)(i). There are also no known recognized standards as identified in WAC 246-310-200(2)(a)(ii) and (b) that directs what specific staffing patterns or numbers of FTEs that should be employed for projects of this type or size. Therefore, using its experience and expertise the department concludes that the planning would allow for the required coverage.

Heart of Hospice

- “We have all staff members on full time employment we do not foresee any additional staffing needs as we are already serving these residents based on CN #1373 issued on June 30, 2008, to Heart of Hospice approves the agency to provide Medicare hospice services to the residents of Skamania of Skamania County. The Certificate of Need Program allows an agency to provide Medicare and Medicaid hospice services beyond Skamania County on an occasional basis”.
[Source: Screening responses received February 24, 2017, page 18]

**Reproduced Table
Inspiring Hospice Staffing Pattern**

	Current FTE		Year 1		Year 2		Year 3	
	FTE	Contracted	FTE	Contracted	FTE	Contracted	FTE	Contracted
<i>RN</i>	10	0	10		11		11	
<i>LPN</i>	0	0						
<i>Hospice Aide</i>	8	0	8		9		9	
<i>Nursing Total</i>	18	0	18		20		20	
<i>Admin</i>	1		1		1		1	
<i>Medical Director</i>	2		2		2		2	
<i>DNS</i>	1		1		1		1	
<i>Business /Clerical</i>	4		4		4		4	
<i>ADMIN Total</i>	8		8		10		10	
<i>PT</i>		1		1		1	1	
<i>OT</i>		1		1		1	1	
<i>Speech Therapist</i>	1		1		1		1	
<i>Med Social</i>	2		2		2		2	

	Current FTE		Year 1		Year 2		Year 3	
	FTE	Contracted	FTE	Contracted	FTE	Contracted	FTE	Contracted
Work								
Pastoral /Other Counselor	2		2		2		2	
Volunteers	3		3		3		3	
Others (specify)	2		2		2		2	
ALL OTHERS TOTAL	2		2		2		2	
TOTAL STAFFING	38		38		40		40	

**Reproduced Table
Inspiring Hospice staff to Patient Ratio**

Type of Staff	Staff/Patient Ratio
Skilled Nursing (RN & LPN)	1 RN per 8 patients
Physical Therapist	Under contract with MCMC Visiting Home Health
Occupational Therapist	Under contract with MCMC Visiting Home Health
Medical Social Worker	1 MSW per 30 patients
Speech Therapist	1 ST on staff for all patients
Home Health/ Hospice Aide	1 CHA per 8 patients
Other (list)	

- “Inspiring Hospice Partners believes in keeping our ratios lower than national average is most important in providing the highest levels of service to our patients. Many Hospices nationally will have 1 RN per 15 patients, 1 MSW per 50 patients, 1 Spiritual Care Consoler per 50 patients, 1 C.N.A per 12 patients. We take pride in being able to meet the complete hospice needs of our patients.
- Inspiring Hospice Partners ratios are consistent if not better than those put forth by the National Hospice and Palliative Care Organization. As required by federal law we ensure 24-hour per day 7 days per week availability”.
- Inspiring hospice Partners will continue to utilize existing staff from our existing program. Several of our medical staff live in Klickitat County”. [Source: Screening responses received February 24, 2017, page 19-20]

Public Comments

- None

Rebuttal Comments

- None

Department Evaluation

As shown in the reproduced FTE table above, it appears that Heart of Hospice currently has all the FTEs needed for this project. During the first full year of operation no additional staff are anticipated to be needed. A review of the FTE table shows that Heart of Hospice expects to add one RN and one hospice aide in year 2. No additional staff are anticipated. This is a minimum number of staff and Heart of Hospice states that several of their current staff live in Klickitat County. Dr. Sonia Scheumann an independent contractor was identified as the medical director. Based on the above information, the department concludes that Heart of Hospice has the ability and expertise to recruit and retain a sufficient supply of qualified staff for this project. **This sub criterion is met.**

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

WAC 246-310 does not contain specific WAC 246-310-230(3) criteria as identified in WAC 246-310-200(2)(a)(i). There are no known recognized standards as identified in WAC 246-310-200(2)(a)(ii) and (b) that a facility must meet when it is to be Medicare certified and Medicaid eligible. Therefore, using its experience and expertise the department assessed the applicant's history in meeting these standards at other facilities owned or operated by the applicant.

Heart of Hospice

- *“Given our current operation we are contracted with Sky Lakes Hospital¹⁰ in White Salmon Washington to provide ancillary and support services, we are also contracted with MCMC in the Dalles”.* [Source: Application page 18 and Attachment 8-10 pages 88-94 and 101-117]

Public Comments

- None

Rebuttal Comments

- None

Department Evaluation

Heart of Hospice provided executed copies of its physical therapy services, occupational therapy services, speech/language pathology services agreement between itself and the Visiting Health Services (“MCMC”). The other ancillary agreement is between itself and Skyline Hospital (“The Facility”) and Inspiring Hospice Partners of Oregon d/b/a Heart of Hospice (The “Hospice”). [Source: Attachment 8-10 pages 88-94 and 101-117] Based on the information reviewed in the application, the department concludes that there is reasonable assurance that Heart of Hospice would continue to maintain the necessary relationships with local ancillary and support services providers located in the community. The department concludes **this sub criterion is met.**

¹⁰ The department has identified the reference of “Sky Lakes” Hospital in White Salmon to be a typographical error. The actual hospital’s name is Skyline Hospital. The application contains a copy of the contract between Skyline Hospital and Inspiring Hospice Partners of Oregon d/b/a Heart of Hospice for hospice inpatient, respite and home care services. [Source: Application, pages 101-117]

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

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

Heart of Hospice

- *“Inspiring Hospice Partners is in perfect standing with both Washington Law, as well as other states. We have never had any history of any of the above.”* [Source: Application page 20]

Public Comments

- None

Rebuttal Comments

- None

Department Evaluation

Heart of Hospice has been providing hospice services to residents in Skamania County since 2008. As a part of this review, the department must conclude that the services provided by the agency would continue to be provided in a manner that ensures safe and adequate care to the public.¹¹ To accomplish this task, the department reviewed the quality of care compliance history of the hospice agency. Before Heart of Hospice was sold to Inspiring Hospice, the agency was last surveyed by Washington State office of Investigation and Inspection on June 7, 2016 and the survey revealed no substantial non-compliance issues. Further to assure that provider clinical staff are in compliance with state licensing requirements, the department conducts quality of care check for all active medical staff and others through the Nursing Quality Assurance Commission (NQAC) and Health Systems Quality Assurance (HSQA OCS). For Inspiring Hospice, the department quality check shows the agency credentialed staff members licenses are in good standing, and this includes the agency direct care supervisor Leigh Straton. [Source: Application Page 24 and NQAC, HSQA OCS]

In addition to verifying the quality of care for the hospice agency, the department also performed a quality of care check for Dr. Sonia Scheumann the medical director for Heart of Hospice. The result of the quality of care for the physician did not reveal any adverse license restriction with the State of Washington. [Sources: DOH Provider Credential Search and application pages 2 and 24]

Given the compliance history of Heart of Hospice and its staff, there is reasonable assurance the hospice agency would continue to be operated and managed in conformance with applicable state and federal licensing and certification requirements. Based on the information reviewed, the department concludes that there is reasonable assurance that Heart of Hospice would continue to operate and be managed in conformance with applicable state and federal licensing and certification requirements. **This sub criterion is met.**

¹¹ WAC 246-310-230(5)

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

WAC 246-310 does not contain specific WAC 246-310-230(4) criteria as identified in WAC 246-310-200(2)(a)(i). There are also no known recognized standards as identified in WAC 246-310-200(2)(a)(ii) and (b) that 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 a project of this type and size. Therefore, using its experience and expertise the department assessed the materials in the application.

Heart of Hospice

- *“Consistent with Medicare requirements, the Inspiring Hospice Partners program will involve the patient’s family/caregivers; the patients attending physician, hospice medical director, hospice registered nurses, home health aides, medical social worker, chaplain, trained volunteer, speech, physical and occupational therapist (if needed) on the interdisciplinary team.*
- *Medicare has conditions of participations for hospice providers that require a comprehensive quality assessment and performance improvement (QAPI) requirement that enables hospice to take tailored proactive steps to ensure quality care be measuring that in-service training, customer satisfaction, and quality improvement. Inspiring Hospice Partners is fully committed to continue to participate in QAPI and continued education. Inspiring Partners has also engaged with Relias Learning to provide continued education. See attached example*
- *Inspiring Hospice Partners is contracted with Fazzie who is one of the Medicare approved agencies for hospice. See attached”.* [Source: Screening responses received February 24, 2017, page 20]
- *“Given our current operation we are contracted with Sky Lakes Hospital¹² in White Salmon Washington to provide ancillary and support services, we are also contracted with MCMC in The Dalles.”* [Source: Application page 18]

Public Comments

- None

Rebuttal Comments

- None

Department Evaluation

The department notes that currently the Klickitat County does not have a CN approved Medicare provider providing service to the entire county. The existing hospice agencies have referred Klickitat County patients to Heart of Heart for services. Heart of Hospice has a service agreement with Skyline Hospital located in White Salmon, Klickitat County. The services identified in the service agreement contract are hospice inpatient, respite and home care services. With the approval of the applicant’s proposed project, residents in the planning area would have access to hospice services. Therefore, the department concludes that approval of this project will promote continuity

¹² The department has identified the reference of “Sky Lakes” Hospital in White Salmon to be a typographical error. The actual hospital’s name is Skyline Hospital. The application contains a copy of the contract between Skyline Hospital and Inspiring Hospice Partners of Oregon d/b/a Heart of Hospice for hospice inpatient, respite and home care services. [Source: Application, pages 101-117]

in the provision of healthcare and not result in an unwarranted fragmentation of Medicare certified hospice services within the service area. **This sub-criterion is met.**

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

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

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

Based on the source information reviewed and the applicant's agreement to the conditions identified in the conclusion section of this evaluation, the department determines that Inspiring Hospice Partners of Oregon dba Heart of Hospice, LLC has met 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, the department takes a multi-step approach. Step one determines if the application has met the other criteria of WAC 246-310-210 thru 230. If it has failed to meet one or more of these criteria then the project is determined not to be the best alternative, and would fail this sub-criterion.

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

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

Department Evaluation

Step One

The department determined Heart of Hospice met the applicable review criteria under WAC 246-310-210, 220, and 230. Therefore, the department moves to step two.

Step Two

Heart of Hospice

- *"This project greatly improves continuity and avoids fragmentation. Klickitat County residents currently have less access to Medicare and Medicaid hospice program. Currently based on*

(CN #1373 issued on June 30, 2008, to Heart of Hospice approves the agency to provide Medicare and Medicaid hospice services to the residents of Skamania County.

- *We are seeking approval for Klickitat County because the residents are having to wait for the communication from the State prior to receiving their hospice benefit. The approval of this project will allow for us to serve the residents of Klickitat without explaining to them that we must wait for approval from the state each time...Many of these residents have been referred to both KVH and Providence Hospice...these families have had to wait to discover that neither one of these program is going to serve them...* [Source: Screening responses received February 24, 2017, page 21]

Public Comments

- None

Rebuttal Comments

- None

Department Evaluation

Based on Heart of Hospice's experience with the other Klickitat County hospice agencies referring patients to it, they did not explore other alternatives to submitting this application. The department agrees with the applicant's assertion that Klickitat County residents have less access to Medicare and Medicaid certified hospice services. On numerous occasions within the previous twelve months, the department has permitted the applicant provide services to residents in Klickitat County because the two providers in the planning area could not provide services to those residents. Further, the department notes that the approval of this project would enable the residents of Klickitat County to have access to a Medicare and Medicaid certified hospice agency approved to serve the entire county. The department did not identify any other alternative that was a superior alternative, in terms of cost, efficiency, or effectiveness that is available or practicable. The department previously concluded in the need section of this evaluation that the ADC in the planning area is not sufficient, but due to the lack of a Medicare and Medicaid provider available to provider hospice services to all residents in Klickitat County, and given that the applicant qualified for an exemption, the department concludes approval of Heart of Hospice application is the best available alternative. **This sub-criterion is met.**

Step Three

Department Evaluation

This step is applicable only when there are two or more approvable projects. Heart of Hospice's application is the only application under review to add a hospice agency in Klickitat County. Therefore this step does not apply.

Based on the information above, the department concludes **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;

WAC 246-310 does not contain specific WAC 246-310-240(2)(a) criteria as identified in WAC 246-310-200(2)(a)(i). There are known minimum building and energy standards that healthcare

facilities must meet to be licensed or certified to provide care. If built to only the minimum standards all construction projects could be determined to be reasonable.

Department Evaluation

This project does not involve construction. Therefore, **this sub-criterion is not applicable to the application.**

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

Department Evaluation

This project does not involve construction. Therefore, **this sub-criterion is not applicable.**

(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.

Department Evaluation

This project will improve the delivery of health services. Although there are two hospice agencies approved for Klickitat County neither provide services to the entire county. Providence Hospice is approved to serve only West Klickitat County and KVHH&H serves hospice patients primarily only within its public hospital district. If approved, Heart of Hospice has stated is commitment to serve hospice patients throughout Klickitat County. This project will appropriately improve the delivery of health services. Therefore, the department concludes this sub-criterion is met.

APPENDIX A



**Department of Health
2016-2017 Hospice Numeric Need Methodology
Released August 2016**

WAC 246-310-290(7)(a): Step 1. Calculate the following four statewide predicted hospice use rates using CMS and department of health data or other available data sources.

- (i) The predicted percentage of cancer patients sixty-five and over who will use hospice services. This percentage is calculated by dividing the average number of hospice admissions over the last three years for patients the age of sixty-five and over with cancer by the average number of past three years statewide total deaths sixty-five and over from cancer.
- (ii) The predicted percentage of cancer patients under sixty-five who will use hospice services. This percentage is calculated by dividing the average number of hospice admissions over the last three years for patients under the age of sixty-five with cancer by the current statewide total of deaths under sixty-five with cancer.
- (iii) The predicted percentage of noncancer patients sixty-five and over who will use hospice services. This percentage is calculated by dividing the average number of hospice admissions over the last three years for patients age sixty-five and over with diagnoses other than cancer by the current statewide total of deaths over sixty-five with diagnoses other than cancer.
- (iv) The predicted percentage of noncancer patients under sixty-five who will use hospice services. This percentage is calculated by dividing the average number of hospice admissions over the last three years for patients under the age of sixty-five with diagnoses other than cancer by the current statewide total of deaths under sixty-five with diagnoses other than cancer.

i. Hospice admissions ages 65+ w/cancer	
2013	7,064
2014	7,420
2015	7,485
average	7,323.00

Deaths ages 65+ w/cancer	
2013	8,296
2014	8,580
2015	8,953
average	8,609.67

Hospice use rates by age and diagnosis	
65+ w/cancer	85.06%
0-64 w/cancer	72.08%
65+ w/o cancer	52.79%
0-64 w/o cancer	14.04%

Rates of cancer as cause of death	
65+	22.14%
0-64	26.20%

Hospice use rate by age	
65+	59.93%
0-64	29.25%

ii. Hospice admissions age 0-64 w/cancer	
2013	2,405
2014	2,450
2015	2,864
average	2,573.00

Deaths ages 0-64 w/cancer	
2013	3,516
2014	3,610
2015	3,583
average	3,569.67

Year	Total Deaths		
	Ages 0-64	Ages 65+	All
2013	13,027	38,011	51,038
2014	13,496	38,538	52,034
2015	14,347	40,135	54,482
average	13,623	38,895	52,518

iii. Hospice admissions ages 65+ w/o cancer	
2013	14,902
2014	16,017
2015	17,043
average	15,987.33

Deaths ages 65+ w/o cancer	
2013	29,715
2014	29,958
2015	31,182
average	30,285.00

iv. Hospice admissions ages 0-64 w/o cancer	
2013	1,354
2014	1,291
2015	1,590
average	1,411.67

Deaths ages 0-64 w/o cancer	
2013	9,511
2014	9,886
2015	10,764
average	10,053.67

Sources:
 Vital Statistics reports A9 and C3 for 2013 and 2014
 Vital Statistics Preliminary Death Data - April 2016 for 2015
 2016-2017 Survey for 2015 Data.



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WAC 246-310-290(7)(b) Step 2. Calculate the average number of total resident deaths over the last three years for each planning area.

County	Ages 0-64			Average
	2013	2014	2015	
Adams	36	35	35	35.33
Asotin	42	46	62	50.00
Benton	338	316	371	341.67
Chelan	136	152	152	146.67
Clallam	173	178	203	184.67
Clark	831	885	881	865.67
Columbia	13	7	14	11.33
Cowlitz	273	280	280	277.67
Douglas	63	69	82	71.33
Ferry	29	28	23	26.67
Franklin	122	109	111	114.00
Garfield	3	0	4	2.33
Grant	181	187	197	188.33
Grays Harbor	210	232	239	227.00
Island	144	154	165	154.33
Jefferson	61	61	67	63.00
King	3,090	3,266	3,392	3,249.33
Kitsap	446	551	537	511.33
Kittitas	73	61	82	72.00
Klickitat	37	54	33	41.33
Lewis	187	187	234	202.67
Lincoln	21	22	20	21.00
Mason	156	152	184	164.00
Okanogan	91	117	128	112.00
Pacific	51	67	71	63.00
Pend Oreille	37	47	42	42.00
Pierce	1,782	1,777	1,889	1,816.00
San Juan	33	34	32	33.00
Skagit	240	259	279	259.33
Skamania	21	20	33	24.67
Snohomish	1,275	1,368	1,474	1,372.33
Spokane	1,105	1,093	1,228	1,142.00
Stevens	105	112	127	114.67
Thurston	526	493	581	533.33
Wahkiakum	13	12	3	9.33
Walla Walla	116	130	122	122.67
Whatcom	378	337	371	362.00
Whitman	59	55	74	62.67
Yakima	530	543	525	532.67

County	Ages 65+			Average
	2013	2014	2015	
Adams	85	98	101	94.67
Asotin	195	188	212	198.33
Benton	932	993	1,103	1,009.33
Chelan	553	573	543	556.33
Clallam	770	773	754	765.67
Clark	2,255	2,392	2,555	2,400.67
Columbia	38	46	48	44.00
Cowlitz	806	832	864	834.00
Douglas	241	244	230	238.33
Ferry	59	52	54	55.00
Franklin	238	252	257	249.00
Garfield	22	12	28	20.67
Grant	490	454	488	477.33
Grays Harbor	599	587	557	581.00
Island	496	521	597	538.00
Jefferson	263	278	313	284.67
King	9,330	9,375	9,307	9,337.33
Kitsap	1,543	1,593	1,608	1,581.33
Kittitas	231	201	223	218.33
Klickitat	121	130	120	123.67
Lewis	614	614	666	631.33
Lincoln	90	82	79	83.67
Mason	485	473	497	485.00
Okanogan	304	305	340	316.33
Pacific	239	248	257	248.00
Pend Oreille	106	93	101	100.00
Pierce	4,217	4,365	4,548	4,376.67
San Juan	101	113	118	110.67
Skagit	834	871	909	871.33
Skamania	53	58	51	54.00
Snohomish	3,581	3,589	3,831	3,667.00
Spokane	3,119	3,060	3,362	3,180.33
Stevens	295	347	358	333.33
Thurston	1,485	1,551	1,650	1,562.00
Wahkiakum	41	34	35	36.67
Walla Walla	429	450	468	449.00
Whatcom	1,206	1,154	1,261	1,207.00
Whitman	201	214	223	212.67
Yakima	1,344	1,323	1,419	1,362.00

Sources:

Vital Statistics reports A9 and C3 for 2013 and 2014
 Vital Statistics Preliminary Death Data - April 2016 for 2015



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WAC 246-310-290(7)(c) Step 3. Multiply each hospice use rate determined in Step 1 by the planning areas average total resident deaths determined in Step 2.

Ages 0-64			
County	2013-2015 Average Deaths	Cancer Projected	No Cancer Projected
Adams	35.33	7	4
Asotin	50.00	9	5
Benton	341.67	65	35
Chelan	146.67	28	15
Clallam	184.67	35	19
Clark	865.67	163	90
Columbia	11.33	2	1
Cowlitz	277.67	52	29
Douglas	71.33	13	7
Ferry	26.67	5	3
Franklin	114.00	22	12
Garfield	2.33	0	0
Grant	188.33	36	20
Grays Harbor	227.00	43	24
Island	154.33	29	16
Jefferson	63.00	12	7
King	3,249.33	614	337
Kitsap	511.33	97	53
Kittitas	72.00	14	7
Klickitat	41.33	8	4
Lewis	202.67	38	21
Lincoln	21.00	4	2
Mason	164.00	31	17
Okanogan	112.00	21	12
Pacific	63.00	12	7
Pend Oreille	42.00	8	4
Pierce	1,816.00	343	188
San Juan	33.00	6	3
Skagit	259.33	49	27
Skamania	24.67	5	3
Snohomish	1,372.33	259	142
Spokane	1,142.00	216	118
Stevens	114.67	22	12
Thurston	533.33	101	55
Wahkiakum	9.33	2	1
Walla Walla	122.67	23	13
Whatcom	362.00	68	38
Whitman	62.67	12	6
Yakima	532.67	101	55

Ages 65+			
County	2013-2015 Average Deaths	Cancer Projected	No Cancer Projected
Adams	94.67	18	39
Asotin	198.33	37	82
Benton	1,009.33	190	415
Chelan	556.33	105	229
Clallam	765.67	144	315
Clark	2,400.67	452	987
Columbia	44.00	8	18
Cowlitz	834.00	157	343
Douglas	238.33	45	98
Ferry	55.00	10	23
Franklin	249.00	47	102
Garfield	20.67	4	8
Grant	477.33	90	196
Grays Harbor	581.00	109	239
Island	538.00	101	221
Jefferson	284.67	54	117
King	9,337.33	1,758	3,838
Kitsap	1,581.33	298	650
Kittitas	218.33	41	90
Klickitat	123.67	23	51
Lewis	631.33	119	260
Lincoln	83.67	16	34
Mason	485.00	91	199
Okanogan	316.33	60	130
Pacific	248.00	47	102
Pend Oreille	100.00	19	41
Pierce	4,376.67	824	1,799
San Juan	110.67	21	45
Skagit	871.33	164	358
Skamania	54.00	10	22
Snohomish	3,667.00	690	1,507
Spokane	3,180.33	599	1,307
Stevens	333.33	63	137
Thurston	1,562.00	294	642
Wahkiakum	36.67	7	15
Walla Walla	449.00	85	185
Whatcom	1,207.00	227	496
Whitman	212.67	40	87
Yakima	1,362.00	256	560



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WAC 246-310-290(7)(d) Step 4. Add the four subtotals derived in Step 3 to project the potential volume of hospice services in each planning area.

County	Average Deaths	Ages 0-64 w/Cancer Projected	Ages 0-64 w/o Cancer Projected	Ages 65+ w/Cancer Projected	Ages 65+ w/o Cancer Projected	Total Projected Patients
Adams	130.00	7	4	18	39	67
Asotin	248.33	9	5	37	82	133
Benton	1,351.00	65	35	190	415	705
Chelan	703.00	28	15	105	229	376
Clallam	950.33	35	19	144	315	513
Clark	3,266.33	163	90	452	987	1,692
Columbia	55.33	2	1	8	18	30
Cowlitz	1,111.67	52	29	157	343	581
Douglas	309.67	13	7	45	98	164
Ferry	81.67	5	3	10	23	41
Franklin	363.00	22	12	47	102	183
Garfield	23.00	0	0	4	8	13
Grant	665.67	36	20	90	196	341
Grays Harbor	808.00	43	24	109	239	415
Island	692.33	29	16	101	221	368
Jefferson	347.67	12	7	54	117	189
King	12,586.67	614	337	1,758	3,838	6,546
Kitsap	2,092.67	97	53	298	650	1,097
Kittitas	290.33	14	7	41	90	152
Klickitat	165.00	8	4	23	51	86
Lewis	834.00	38	21	119	260	438
Lincoln	104.67	4	2	16	34	56
Mason	649.00	31	17	91	199	339
Okanogan	428.33	21	12	60	130	222
Pacific	311.00	12	7	47	102	167
Pend Oreille	142.00	8	4	19	41	72
Pierce	6,192.67	343	188	824	1,799	3,154
San Juan	143.67	6	3	21	45	76
Skagit	1,130.67	49	27	164	358	598
Skamania	78.67	5	3	10	22	40
Snohomish	5,039.33	259	142	690	1,507	2,599
Spokane	4,322.33	216	118	599	1,307	2,240
Stevens	448.00	22	12	63	137	233
Thurston	2,095.33	101	55	294	642	1,092
Wahkiakum	46.00	2	1	7	15	25
Walla Walla	571.67	23	13	85	185	305
Whatcom	1,569.00	68	38	227	496	829
Whitman	275.33	12	6	40	87	146
Yakima	1,894.67	101	55	256	560	972



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WAC 246-310-290(7)(e) Step 5. Inflate the potential volume of hospice service by the one-year estimated population growth (using OFM data).

County	Projected Patients	2013-2015 Average Population	2016	2017	2018	2019	2020	2016 Potential volume	2017 Potential volume	2018 Potential volume	2019 Potential volume	2020 Potential volume
Adams	67	19,951	20,502	20,794	21,082	21,364	21,640	69	70	71	72	73
Asotin	133	21,779	21,852	21,905	21,954	21,996	22,033	134	134	135	135	135
Benton	705	182,941	187,492	190,054	192,631	195,217	197,806	722	732	742	752	762
Chelan	376	74,635	75,854	76,550	77,238	77,918	78,586	382	386	389	393	396
Clallam	513	71,775	72,273	72,617	72,956	73,290	73,616	516	519	521	524	526
Clark	1,692	442,833	453,499	459,548	465,638	471,753	477,884	1,733	1,756	1,779	1,802	1,826
Columbia	30	4,053	4,038	4,034	4,028	4,021	4,013	30	30	30	29	29
Cowlitz	581	104,586	105,814	106,534	107,239	107,924	108,588	588	592	596	600	603
Douglas	164	40,169	41,218	41,812	42,411	43,014	43,619	168	170	173	175	178
Ferry	41	7,605	7,634	7,655	7,674	7,691	7,706	41	41	41	41	41
Franklin	183	85,837	90,363	92,902	95,511	98,185	100,926	192	198	203	209	215
Garfield	13	2,244	2,234	2,231	2,228	2,225	2,220	13	13	13	13	13
Grant	341	94,482	97,447	99,090	100,744	102,408	104,078	352	358	364	370	376
Grays Harbor	415	73,419	73,701	73,898	74,083	74,253	74,408	416	417	418	419	420
Island	368	79,971	80,808	81,307	81,796	82,273	82,735	371	374	376	378	380
Jefferson	189	30,350	30,818	31,108	31,405	31,709	32,017	192	194	196	198	199
King	6,546	1,996,475	2,031,620	2,051,383	2,070,888	2,090,044	2,108,814	6,662	6,726	6,790	6,853	6,915
Kitsap	1,097	259,852	264,698	267,433	270,161	272,865	275,546	1,118	1,129	1,141	1,152	1,164
Kittitas	152	42,257	43,152	43,671	44,195	44,723	45,255	155	157	159	161	163
Klickitat	86	20,548	20,667	20,743	20,815	20,881	20,943	87	87	87	88	88
Lewis	438	77,188	78,169	78,741	79,302	79,852	80,385	443	446	450	453	456
Lincoln	56	10,607	10,632	10,654	10,674	10,692	10,707	56	57	57	57	57
Mason	339	62,702	64,134	64,968	65,816	66,675	67,545	346	351	355	360	365
Okanogan	222	42,008	42,383	42,597	42,799	42,989	43,163	224	225	227	228	228
Pacific	167	20,872	20,884	20,913	20,940	20,966	20,990	167	167	168	168	168
Pend Oreille	72	13,231	13,372	13,457	13,538	13,616	13,692	73	73	74	74	75
Pierce	3,154	824,600	840,654	849,678	858,691	867,659	876,565	3,216	3,250	3,285	3,319	3,353
San Juan	76	15,879	15,982	16,052	16,122	16,189	16,256	76	77	77	77	78
Skagit	598	120,679	122,945	124,246	125,567	126,902	128,249	609	616	622	629	636
Skamania	40	11,239	11,328	11,383	11,438	11,493	11,548	40	40	40	40	41
Snohomish	2,599	742,953	761,734	772,428	783,224	794,090	805,015	2,665	2,702	2,740	2,778	2,816
Spokane	2,240	485,837	494,431	499,348	504,243	509,100	513,910	2,280	2,302	2,325	2,347	2,369
Stevens	233	44,116	44,436	44,636	44,834	45,026	45,212	235	236	237	238	239
Thurston	1,092	263,432	270,918	275,194	279,516	283,875	288,265	1,123	1,141	1,159	1,177	1,195
Wahkiakum	25	3,940	3,917	3,909	3,899	3,889	3,877	25	25	24	24	24
Walla Walla	305	59,768	60,343	60,690	61,031	61,363	61,685	308	310	311	313	315
Whatcom	829	208,268	213,303	216,228	219,209	222,235	225,307	849	861	873	885	897
Whitman	146	45,866	46,472	46,822	47,165	47,501	47,826	148	149	150	151	152
Yakima	972	253,719	258,730	261,462	264,150	266,780	269,347	991	1,002	1,012	1,022	1,032

Source:
 OFM - Projections of the total resident population for the growth management act medium series: 2010-2040 by single year



Department of Health
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Released August 2016

WAC 246-310-290(7)(f) Step 6. Subtract the current hospice capacity in each planning area from the above projected volume of hospice services to determine unmet need.
WAC 246-310-290(7)(g) Determine the number of hospice agencies in the proposed planning area which could support the unmet need with an ADC of thirty-five.

County	2016 Potential Volume	2017 Potential Volume	2018 Potential Volume	2019 Potential Volume	2020 Potential Volume	Current Capacity	2016 Unmet Need admits	2017 Unmet Need admits	2018 Unmet Need admits	2019 Unmet Need admits	2020 Unmet Need admits	Statewide ALOS	2016 Unmet Need Patient Days	2017 Unmet Need Patient Days	2018 Unmet Need Patient Days	2019 Unmet Need Patient Days	2020 Unmet Need Patient Days	2016 Unmet Need ADC	2017 Unmet Need ADC	2018 Unmet Need ADC	2019 Unmet Need ADC	2020 Unmet Need ADC	Need for Additional Agency?	# of Additional Agencies Needed
Adams	69	70	71	72	73	40.00	29	30	31	32	33	56.94	1,647	1,703	1,758	1,812	1,865	5	5	5	5	5	FALSE	FALSE
Asotin	134	134	135	135	135	59.00	75	75	76	76	76	56.94	4,267	4,285	4,303	4,317	4,330	12	12	12	12	12	FALSE	FALSE
Benton	722	732	742	752	762	796.00	-74	-64	-54	-44	-34	56.94	-4,192	-3,630	-3,064	-2,497	-1,929	-11	-10	-8	-7	-5	FALSE	FALSE
Chelan	382	386	389	393	396	375.00	7	11	14	18	21	56.94	425	625	823	1,018	1,210	1	2	2	3	3	FALSE	FALSE
Clallam	516	519	521	524	526	192.00	324	327	329	332	334	56.94	18,474	18,614	18,752	18,888	19,021	51	51	51	52	52	TRUE	1.49
Clark	1,733	1,756	1,779	1,802	1,826	1,703.67	29	52	75	99	122	56.94	1,654	2,970	4,295	5,625	6,959	5	8	12	15	19	FALSE	FALSE
Columbia	30	30	30	29	29	13.33	16	16	16	16	16	56.94	925	923	921	918	914	3	3	3	3	2	FALSE	FALSE
Cowlitz	588	592	596	600	603	743.00	-155	-151	-147	-143	-140	56.94	-8,833	-8,605	-8,382	-8,166	-7,956	-24	-24	-23	-22	-21	FALSE	FALSE
Douglas	168	170	173	175	178	157.33	11	13	16	18	20	56.94	606	744	883	1,023	1,163	2	2	2	3	3	FALSE	FALSE
Ferry	41	41	41	41	41	23.33	18	18	18	18	18	56.94	1,001	1,008	1,013	1,019	1,023	3	3	3	3	2	FALSE	FALSE
Franklin	192	198	203	209	215	155.33	37	42	48	54	59	56.94	2,099	2,407	2,723	3,047	3,379	6	7	7	8	9	FALSE	FALSE
Garfield	13	13	13	13	13	4.33	9	9	9	9	9	56.94	494	493	492	491	490	1	1	1	1	1	FALSE	FALSE
Grant	352	358	364	370	376	224.00	128	134	140	146	152	56.94	7,281	7,619	7,959	8,301	8,644	20	21	22	23	23	FALSE	FALSE
Grays Harbor	416	417	418	419	420	174.67	242	243	244	245	246	56.94	13,752	13,816	13,875	13,930	13,980	38	38	38	38	38	TRUE	1.09
Island	371	374	376	378	380	332.67	39	41	43	45	48	56.94	2,207	2,337	2,465	2,590	2,711	6	6	7	7	7	FALSE	FALSE
Jefferson	192	194	196	198	199	146.67	45	47	49	51	53	56.94	2,578	2,681	2,787	2,894	3,004	7	7	8	8	8	FALSE	FALSE
King	6,662	6,726	6,790	6,853	6,915	7,443.33	-782	-717	-653	-590	-529	56.94	-44,507	-40,818	-37,176	-33,599	-30,095	-122	-112	-102	-92	-82	FALSE	FALSE
Kitsap	1,118	1,129	1,141	1,152	1,164	1,048.67	69	81	92	104	115	56.94	3,933	4,591	5,247	5,897	6,542	11	13	14	16	17	FALSE	FALSE
Kittitas	155	157	159	161	163	109.00	46	48	50	52	54	56.94	2,627	2,733	2,840	2,948	3,057	7	7	8	8	8	FALSE	FALSE
Klickitat	87	87	87	88	88	75.00	12	12	12	13	13	56.94	666	685	702	717	732	2	2	2	2	2	FALSE	FALSE
Lewis	443	446	450	453	456	384.67	59	62	65	68	71	56.94	3,334	3,518	3,699	3,877	4,049	9	10	10	11	11	FALSE	FALSE
Lincoln	56	57	57	57	57	19.67	37	37	37	37	37	56.94	2,093	2,099	2,105	2,111	2,115	6	6	6	6	5	FALSE	FALSE
Mason	346	351	355	360	365	243.00	103	108	112	117	122	56.94	5,886	6,142	6,403	6,667	6,935	16	17	18	18	18	FALSE	FALSE
Okanogan	224	225	227	228	228	170.00	54	55	57	58	58	56.94	3,093	3,158	3,219	3,276	3,329	8	9	9	9	9	FALSE	FALSE
Pacific	167	167	168	168	168	63.33	104	104	104	104	105	56.94	5,912	5,925	5,937	5,949	5,960	16	16	16	16	16	FALSE	FALSE
Pend Oreille	73	73	74	74	75	46.33	27	27	28	28	28	56.94	1,517	1,544	1,569	1,593	1,617	4	4	4	4	4	FALSE	FALSE
Pierce	3,216	3,250	3,285	3,319	3,353	3,698.67	-483	-449	-414	-380	-346	56.94	-27,506	-25,541	-23,578	-21,625	-19,685	-75	-70	-65	-59	-53	FALSE	FALSE
San Juan	76	77	77	77	78	59.67	17	17	17	18	18	56.94	957	976	995	1,013	1,031	3	3	3	3	3	FALSE	FALSE
Skagit	609	616	622	629	636	585.33	24	30	37	44	50	56.94	1,364	1,731	2,104	2,481	2,861	4	5	6	7	7	FALSE	FALSE
Skamania	40	40	40	40	41	43.00	-3	-3	-3	-3	-2	56.94	-177	-166	-155	-144	-133	0	0	0	0	0	FALSE	FALSE
Snohomish	2,665	2,702	2,740	2,778	2,816	2,635.00	30	67	105	143	181	56.94	1,697	3,827	5,977	8,142	10,318	5	10	16	22	28	FALSE	FALSE
Spokane	2,280	2,302	2,325	2,347	2,369	2,553.67	-274	-251	-229	-206	-184	56.94	-15,601	-14,310	-13,025	-11,750	-10,487	-43	-39	-36	-32	-28	FALSE	FALSE
Stevens	235	236	237	238	239	128.33	107	108	109	110	111	56.94	6,074	6,134	6,194	6,252	6,308	17	17	17	17	17	FALSE	FALSE
Thurston	1,123	1,141	1,159	1,177	1,195	972.00	151	169	187	205	223	56.94	8,607	9,617	10,637	11,666	12,702	24	26	29	32	34	FALSE	FALSE
Wahkiakum	25	25	24	24	24	17.67	7	7	7	7	7	56.94	392	390	386	382	378	1	1	1	1	1	FALSE	FALSE
Walla Walla	308	310	311	313	315	293.67	14	16	18	19	21	56.94	811	912	1,011	1,107	1,201	2	2	3	3	3	FALSE	FALSE
Whatcom	849	861	873	885	897	874.33	-25	-13	-2	11	23	56.94	-1,425	-762	-86	600	1,297	-4	-2	0	2	3	FALSE	FALSE
Whitman	148	149	150	151	152	146.00	2	3	4	5	6	56.94	97	161	223	284	342	0	0	1	1	0	FALSE	FALSE
Yakima	991	1,002	1,012	1,022	1,032	953.67	38	48	58	68	78	56.94	2,141	2,737	3,324	3,897	4,457	6	7	9	11	12	FALSE	FALSE



**Department of Health
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SURVEY RESPONSES**

County	Agency	License Number	2013				2014				2015				"Current Capacity"
			Ages 0-64		Ages 65+		Ages 0-64		Ages 65+		Ages 0-64		Ages 65+		
			Cancer	No Cancer	Cancer	No Cancer	Cancer	No Cancer	Cancer	No Cancer	Cancer	No Cancer	Cancer	No Cancer	
Adams	Assured Home Health and Hospice (Central Basin/Assured Hospice)	IHS.FS.60092413	3	2	10	18	7	0	15	29	7	1	8	20	40.00
Asotin	Elite Home Health and Hospice (Tri State Memorial)	IHS.FS.60384078	11	2	19	19	4	2	24	25	8	4	24	35	59.00
Benton	Tri-Cities Chaplaincy	IHS.FS.00000456	69	29	142	318	61	35	150	383	70	33	193	390	796.00
Benton	Heartlinks Hospice and Palliative Care (Lower Valley Hospice)	IHS.FS.00000369	6	14	49	114	7	4	23	118	3	2	20	155	
Chelan	Central Washington Hospital Home Care Services	IHS.FS.00000250	29	14	68	190	28	19	88	277	28	21	88	275	375.00
Chelan	Lake Chelan Community Hospital Home Health and Hospice (Leah Thompson) ¹	IHS.FS.00000363	5	0	0	0									
Clallam	Assured Home Health, Hospice & Home Care	IHS.FS.00000229	17	108	48	108	16	8	53	102	9	4	36	67	192.00
Clark	Kaiser Permanente Continuing Care Services	IHS.FS.00000353	29	10	76	196	37	10	122	270	31	21	80	273	1,703.67
Clark	Community Home Health and Hospice CHHH Community Home Care Hospice	IHS.FS.00000262	31	28	65	169	26	24	53	139	25	55	85	270	
Clark	Homecare and Hospice Southwest (Hospice SW)	IHS.FS.60331226	98	47	253	634	151	87	342	796	48	77	134	317	
Clark	Providence Hospice (Hospice of the Gorge)	IHS.FS.60201476	1	0	0	1	0	0	0	0	0	0	0	0	
Columbia	Walla Walla Community Hospice	IHS.FS.60480441	1	0	3	1	0	0	7	7	2	1	8	10	13.33
Cowlitz	Kaiser Permanente Continuing Care Services	IHS.FS.00000353	0	0	1	1	0	0	2	7	0	1	2	4	743.00
Cowlitz	Community Home Health and Hospice CHHH Community Home Care Hospice	IHS.FS.00000262	71	62	182	458	59	52	153	384	45	59	126	472	
Cowlitz	Homecare and Hospice Southwest (Hospice SW)	IHS.FS.60331226	3	1	4	9	3	1	9	12	1	13	3	29	
Douglas	Frontier Home Health and Hospice (Okanogan Regional)	IHS.FS.60379608	2	0	1	2	0	1	2	0	0	0	3	4	157.33
Douglas	Central Washington Hospital Home Care Services	IHS.FS.00000250	14	7	26	101	5	4	30	113	12	7	52	86	
Ferry	Hospice of Spokane	IHS.FS.00000337	7	2	3	18	3	3	9	8	2	0	7	8	23.33
Franklin	Tri-Cities Chaplaincy	IHS.FS.00000456	23	10	29	97	12	7	29	76	13	13	34	123	155.33
Garfield	Elite Home Health and Hospice (Tri State Memorial)	IHS.FS.60384078	0	0	2	0	0	0	2	2	0	0	5	2	4.33
Grant	Frontier Home Health and Hospice (Okanogan Regional)	IHS.FS.60379608	0	0	0	1	0	0	2	4	1	0	1	4	224.00
Grant	Assured Home Health and Hospice (Central Basin/Assured Hospice)	IHS.FS.60092413	31	9	71	127	30	18	74	111	22	8	80	78	
Grays Harbor	Harbors Home Health and Hospice	IHS.FS.00000306	24	7	96	52	33	11	88	65	10	18	47	73	174.67
Island	Providence Hospice and Home Care of Snohomish County	IHS.FS.00000418	2	2	10	11	4	1	9	12	1	0	6	9	
Island	Home Health Care of Whidbey General Hospital (Whidbey General) ²	IHS.FS.00000323	0	0	0	0	2	0	16	19	16	4	58	104	
Island	Hospice of the Northwest (Skagit Hospice Service)	IHS.FS.00000437	14	5	64	97	22	6	61	113	8	4	29	56	



**Department of Health
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SURVEY RESPONSES**

County	Agency	License Number	2013				2014				2015				"Current Capacity"	
			Ages 0-64		Ages 65+		Ages 0-64		Ages 65+		Ages 0-64		Ages 65+			
			Cancer	No Cancer	Cancer	No Cancer	Cancer	No Cancer	Cancer	No Cancer	Cancer	No Cancer	Cancer	No Cancer		
Island	Evergreen Health Home Care Services	IHS.FS.00000278	0	0	2	0	0	0	0	0	1	0	0	0	1	332.67
Jefferson	Assured Home Health, Hospice & Home Care	IHS.FS.00000229	1	0	0	4	1	0	0	3	1	0	2	1	146.67	
Jefferson	Jefferson Healthcare Home Health and Hospice (Hospice of Jefferson County)	IHS.FS.00000349	13	0	44	54	14	3	46	69	10	5	63	106		
King	Providence Hospice and Home Care of Snohomish County	IHS.FS.00000418	0	0	0	0	0	0	2	1	1	1	0	1		
King	Gentiva Hospice (Odyssey Hospice) ³	IHS.FS.60330209	0	0	3	50	2	60	2	173	13	6	80	158		
King	Group Health Home Health and Hospice	IHS.FS.00000305	42	10	212	495	76	29	260	591	36	50	204	1,039		
King	Franciscan Hospice	IHS.FS.00000287	50	26	260	529	29	15	324	614	172	43	361	700		
King	Providence Hospice of Seattle	IHS.FS.00000336	318	109	615	1,199	290	125	551	1,183	339	131	653	1,094		
King	Evergreen Health Home Care Services	IHS.FS.00000278	204	76	571	1,395	223	85	608	1,570	219	72	580	1,542		
King	Multicare Good Samaritan Hospice (Good Samaritan)	IHS.FS.60223505	23	4	47	82	13	12	53	65	11	11	52	51		
King	Kline Galland Community Based Services	IHS.FS.60103742	6	4	50	106	14	6	100	236	14	6	59	214		
King	Wesley Homes ⁴	n/a									0	0	0	0	7,443.33	
Kitsap	Hospice of Kitsap County	IHS.FS.00000335	70	35	215	350	66	23	157	192					1,048.67	
Kitsap	Group Health Home Health and Hospice	IHS.FS.00000305	9	6	33	48	23	1	32	90	7	15	33	153		
Kitsap	Franciscan Hospice	IHS.FS.00000287	15	10	84	170	10	6	136	237	61	30	133	299		
Kitsap	Multicare Good Samaritan Hospice (Good Samaritan)	IHS.FS.60223505									55	9	131	202		
Kittitas	Kittitas Valley Home Health and Hospice	IHS.FS.00000320	10	4	38	53	8	1	34	53	11	4	48	63	109.00	
Klickitat	Klickitat Valley Home Health & Hospice (Klickitat Valley Health)	IHS.FS.00000361	4	0	14	11	4	0	13	12	3	1	19	17	75.00	
Klickitat	Heart of Hospice LLC	IHS.FS.00000185	0	0	0	0	2	1	11	10	1	0	9	7		
Klickitat	Providence Hospice (Hospice of the Gorge)	IHS.FS.60201476	1	3	8	17	4	2	9	19	3	1	7	12		
Lewis	Providence SoundHomeCare and Hospice	IHS.FS.00000420	26	6	35	52	19	9	45	66	32	14	55	79	384.67	
Lewis	Assured Home Health, Hospice & Home Care	IHS.FS.00000229	15	14	68	149	14	6	74	137	12	18	61	148		
Lincoln	Assured Home Health and Hospice (Central Basin/Assured Hospice)	IHS.FS.60092413	2	1	16	10	6	0	5	8	1	1	7	1	19.67	
Lincoln	Hospice of Spokane	IHS.FS.00000337	0	0	0	0	0	0	0	0	0	0	0	1		
Mason	Providence SoundHomeCare and Hospice	IHS.FS.00000420	22	10	69	95	20	12	52	85	26	11	53	95	243.00	
Mason	Assured Home Health, Hospice & Home Care	IHS.FS.00000229	3	0	12	19	4	1	23	52	6	4	25	30		
Okanogan	Frontier Home Health and Hospice (Okanogan Regional)	IHS.FS.60379608	10	3	35	47	31	8	74	65	17	21	80	119	170.00	
Pacific	Harbors Home Health and Hospice	IHS.FS.00000306	9	1	31	27	11	1	26	31	6	7	16	24	63.33	
Pend Oreille	Hospice of Spokane	IHS.FS.00000337	8	3	22	18	5	3	18	18	7	5	13	19	46.33	
Pierce	Group Health Home Health and Hospice	IHS.FS.00000305	34	7	67	128	31	11	102	150	73	61	104	340		



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SURVEY RESPONSES**

County	Agency	License Number	2013				2014				2015				"Current Capacity"
			Ages 0-64		Ages 65+		Ages 0-64		Ages 65+		Ages 0-64		Ages 65+		
			Cancer	No Cancer	Cancer	No Cancer	Cancer	No Cancer	Cancer	No Cancer	Cancer	No Cancer	Cancer	No Cancer	
Pierce	Franciscan Hospice	IHS.FS.00000287	118	83	792	1,413	47	23	774	1,501	309	133	693	1,541	3,698.67
Pierce	Multicare Good Samaritan Hospice (Good Samaritan)	IHS.FS.60223505	66	115	237	435	104	88	278	435	123	48	290	342	
San Juan	Hospice of the Northwest (Skagit Hospice Service)	IHS.FS.00000437	7	4	17	22	8	5	15	29	4	1	23	44	59.67
Skagit	Hospice of the Northwest (Skagit Hospice Service)	IHS.FS.00000437	47	23	158	363	61	22	172	354	53	24	124	355	585.33
Skamania	Homecare and Hospice Southwest (Hospice SW)	IHS.FS.60331226	0	0	0	0	0	0	0	0	0	0	0	0	43.00
Skamania	Heart of Hospice	IHS.FS.00000185	5	0	6	20	3	1	12	13	5	4	7	12	
Skamania	Kaiser Permanente Continuing Care Services	IHS.FS.00000353	0	0	0	0	0	0	0	0	0	0	0	2	
Skamania	Providence Hospice (Hospice of the Gorge)	IHS.FS.60201476	4	0	0	10	2	0	4	6	2	0	3	8	
Snohomish	Providence Hospice and Home Care of Snohomish County	IHS.FS.00000418	173	85	457	1,047	177	83	388	1,007	201	88	433	1,008	2,635.00
Snohomish	Hospice of the Northwest (Skagit Hospice Service)	IHS.FS.00000437	7	3	23	35	4	1	19	37	6	1	23	53	
Snohomish	Group Health Home Health and Hospice	IHS.FS.00000305	6	1	37	67	13	0	41	82	8	50	42	222	
Snohomish	Providence Hospice of Seattle	IHS.FS.00000336	0	0	0	0	0	0	1	2	4	0	18	10	
Snohomish	Evergreen Health Home Care Services	IHS.FS.00000278	44	22	114	396	36	36	122	450	71	21	153	477	
Spokane	Gentiva Hospice (Family Home Care)	IHS.FS.60308060	4	10	16	91	8	13	21	160	4	19	25	166	2,553.67
Spokane	Hospice of Spokane	IHS.FS.00000337	219	103	512	1,056	237	89	544	955	221	106	572	1,105	
Spokane	Horizon Hospice	IHS.FS.00000332	17	15	83	235	18	11	45	229	25	11	75	256	
Stevens	Hospice of Spokane	IHS.FS.00000337	9	6	49	53	14	4	58	63	18	6	50	55	128.33
Thurston	Providence SoundHomeCare and Hospice	IHS.FS.00000420	66	38	190	402	77	36	170	424	104	30	174	495	972.00
Thurston	Assured Home Health, Hospice & Home Care	IHS.FS.00000229	25	14	69	122	19	11	66	139	16	11	60	158	
Wahkiakum	Community Home Health and Hospice CHHH Community Home Care Hospice	IHS.FS.00000262	3	4	9	12	4	0	11	1	0	1	5	3	17.67
Walla Walla	Walla Walla Community Hospice	IHS.FS.60480441	25	21	82	164	25	13	99	140	27	12	104	169	293.67
Whatcom	Whatcom Hospice (Peacehealth)	IHS.FS.00000471	98	50	219	558	76	48	190	547	72	57	279	429	874.33
Whitman	Gentiva Hospice (Family Home Care)	IHS.FS.60308060	7	1	22	52	11	9	45	102	0	0	58	128	146.00
Whitman	Hospice of Spokane	IHS.FS.00000337	0	0	0	0	0	0	0	0	0	2	1	0	
Yakima	Yakima Regional Home Health and Hospice	IHS.FS.60097245	9	7	12	18	8	19	9	66	8	11	27	68	953.67
Yakima	Heartlinks Hospice and Palliative Care (Lower Valley Hospice)	IHS.FS.00000369	6	15	53	125	14	10	69	103	9	12	84	144	
Yakima	Memorial Home Care Services	IHS.FS.00000376	54	43	134	356	54	56	147	369	75	69	185	413	
TOTAL:			2,405	1,354	7,064	14,902	2,450	1,291	7,420	16,017	2,864	1,590	7,485	17,043	

¹Facility is no longer operating, but has provided data within the last 3 years

²Home Health Care of Whidbey General Hospital. Operational since August 2014 (2014 and 2015 reported data for this facility replaced with 224 admits to assume 35 ADC at statewide ALOS)

³Gentiva Hospice (formerly known as Odyssey Hospice, CN #1416R). Operational since April 2014 (2013 reported data for this facility replaced with 224 admits to assume 35 ADC at statewide ALOS). 2014 and 2015 data exceeded 224

⁴Wesley Homes Community Health Services (CN#1553). Approved June 2015 - not yet in operation (no data reporting, so 224 added to 2014 and 2015 capacity to assume 35 ADC at statewide ALOS)

224 admits for new agency calculated by multiplying 35 ADC by 365 days = 12,775 patient days. Divide the patient days by the statewide ALOS (56.94, per CMS), which results in 224 admits