




STATE HEALTH PLANNING AND DEVELOPMENT AGENCY

100 NORTH UNION STREET, SUITE 870
MONTGOMERY, ALABAMA 36104

NOTICE

DATE: July 24, 2024

TO: Applicant and Interested Parties

FROM: Emily T. Marsal 
Executive Director

SUBJ: Proposed State Health Plan Adjustment submitted by St. Joseph Hospice
PA 2024-002

A Plan Adjustment, designated PA2024-002, has been accepted as complete on July 24, 2024. Persons other than the applicant have thirty (30) days from July 24, 2024, to electronically file statements in opposition to or in support of the application, as well as any other documentation they wish to be considered by the Statewide Health Coordinating Council (SHCC). Pursuant to SHPDA ALA. ADMIN. CODE r. 410-1-3-.09, all such statements and documentation must be filed at shpda.online@shpda.alabama.gov, together with a certification that the filing has been served on the applicant and/or any other persons that have filed notices of support for or opposition to the application.

This Plan Adjustment can be viewed in its entirety at www.shpda.alabama.gov, under Announcements/SHP/Proposed Adjustments & Amendments /PA2024-002 – 410-2-4-.15 Inpatient Hospice Services – St. Joseph Hospice.

Interested parties may address the proposed Plan Adjustment at the SHCC meeting, subject to such time limits and notice requirements as may be imposed by the SHCC Chairman. If the SHCC approves the Plan Adjustment in whole or in part, the adjustment, along with the SHCC's favorable recommendation, will be sent to the Governor for consideration and approval/disapproval. A Plan Adjustment shall be deemed disapproved by the Governor if not acted upon within fifteen (15) days.

SHPDA Rule 410-2-5-.04 – Plan Revision Procedures, may be viewed in its entirety on the Agency's website at www.shpda.alabama.gov, under Announcements/SHP/Approved Adjustments & Amendments/410-2-5-.04 Plan Revision Procedures (Effective 05/15/2020).

Detailed information regarding the applicable deadlines for the proposed Plan Adjustment is listed on the following page.

**STATE OF ALABAMA
STATE HEALTH PLANNING AND DEVELOPMENT AGENCY**

REVIEW SCHEDULE

- TO:
1. Plan Adjustment Applicant
 2. All Providers of Similar Services in the Proposed County
 3. All Providers of Similar Services in Adjacent Counties
 4. Interested Persons

NOTICE: An application for Plan Adjustment has been submitted for review under the provisions of Sections 22-21-260(13), Code of Alabama, 1975. A brief description of the proposal and of the Review Schedule is set forth below:


Emily T. Marsal
Executive Director

July 24, 2024
Date

DESCRIPTION OF PROPOSED FACILITY AND/OR SERVICE		
1. Plan Adjustment No.: PA2024-002	2. TYPE FACILITY: HOSPICE	3. COUNTY: Baldwin
4. NAME OF APPLICANT: St. Joseph Hospice		
5. BRIEF DESCRIPTION OF ADJUSTMENT (Change in bed capacity, service, equipment, units proposed, etc.): The applicant proposes to add ten (10) additional inpatient hospice beds in Baldwin County of Region XIII.		
REVIEW SCHEDULE		
6. REVIEW PERIOD BEGINS (DAY 1): July 24, 2024		
7. DEADLINE FOR PERSONS WISHING TO SUBMIT INFORMATION IN OPPOSITION TO OR SUPPORT OF THE PROPOSED PROJECT (DAY 30): August 22, 2024		
8. PROPOSED DATE OF PUBLIC HEARING: September 10, 2024		

APPLICATION FOR ADJUSTMENT TO THE 2024-2027 ALABAMA STATE HEALTH PLAN

TEN (10) INPATIENT HOSPICE BEDS

BALDWIN COUNTY



PROPOSED ADJUSTMENT

The Statewide Health Coordinating Council (SHCC) has recognized the need in Baldwin County for ten (10) additional inpatient hospice beds as part of Region XIII.

The proposed Plan Adjustment to the Alabama State Health Plan is consistent with the following provisions:

2024-2027 Alabama State Health Plan

410-2-4-.15 Inpatient Hospice Services

(e) Adjustments

The need for inpatient hospice beds, as determined by the methodology, is subject to adjustments by the SHCC. The SHCC may adjust the need for inpatient hospice beds in a region if an applicant documents the existence of at least one of the following conditions:

- 1. Absence of available inpatient beds for a hospice certified for Medicaid and Medicare in the proposed region, and evidence that the applicant will provide Medicaid and Medicare-certified hospice services in the region; or**
- 2. Absence of services by a hospice in the proposed region that serves patients regardless of the patient's ability to pay, and evidence that the applicant will provide services for patients regardless of ability to pay.**
- 3. A community need for additional inpatient hospice services greater than those supported by the numerical methodology.**



410-2-5-.04 Plan Revision Procedures

- (a) Plan Adjustment.** In addition to such other criteria that may be set out in the SHP, a requested modification or exception to the SHP of limited duration, to permit additional facilities, beds, services, or equipment to address circumstances and meet the identified needs of a specific planning area, or part thereof, that is less than statewide and identified in the State Health Plan.
- (3) Application Procedure for Plan Adjustment.** Any person may propose an adjustment to the SHP, which will be considered in accordance with the provisions of SHPDA Rule 410-2-5-.04(4). The proposal will state with specificity the proposed language of the adjustment and shall meet the electronic filing requirements of SHPDA Rule 410-1-3-.09 (Electronic Filing).

(A) APPLICANT IDENTIFICATION:

**St. Joseph Hospice
23 Midtown Park West, Unit B
Mobile, Alabama 36606**

(251) 675-7555

Contact Person:

**Stephen D. Preston
Preston Strategy Group, Inc.
P.O. Box 2183
Fairhope, Alabama 36533**

(205) 873-0816

stephen@prestonstrategygroup.com

Administrative Fee:

\$3,500



INTRODUCTION

St Joseph Hospice

Originally founded in 2002, St. Joseph Hospice specializes in providing peace, comfort, and dignity to those facing a life-limiting illness. Hospice is not a place, but a type of care with a unique philosophy and approach to end-of-life care that focuses on both the patient and their families. Hospice is holistic care that addresses physical, emotional, spiritual and practical concerns.

St. Joseph Hospice provides every patient with a team of healthcare professionals who work together with the patient and family to meet their unique needs and wishes for care. Care team includes:

- Board-certified hospice & palliative care physicians**
- Registered nurses**
- Licensed practical nurses**
- Certified nursing assistants**
- Medical social workers**
- Non-denominational chaplains & pastors**
- Bereavement professionals**
- Hospice-trained volunteers**

St. Joseph Hospice proudly serves locations in Louisiana, Mississippi, Southeast Texas, and South Alabama.





The Carpenter Health Network provides a full continuum of care through a dedicated team of multi-disciplinary, medical professionals ready to help patients and their loved ones.

Mission

The Carpenter Health Network will joyfully provide optimal patient care seamlessly across service lines to ensure spiritual, emotional, and physical healing wherever possible while always respecting life, fostering dignity, and preserving quality of life.



(B) PROJECT DESCRIPTION

Hospice is:

- **Medical care for people with an anticipated life expectancy of 6 months or less, when cure isn't an option, and the focus shifts to symptom management and quality of life.**
- **An interdisciplinary team of professionals trained to address physical, psychosocial, and spiritual needs of the person: the team also supports family members and other intimate unpaid caregivers.**
- **Specialty care that is person-centered, stressing coordination of care, clarification of goals of care, and communication.**

There are four levels of hospice care:

Routine home care - the family and/or loved ones care for patients at home, and receive regular visits from hospice care providers.

General inpatient (GIP) care - hospice care provided in a facility to better manage pain or other symptoms that can't be managed at home

Continuous home care - the patient receives more intensive, short-term support at home to manage a symptom crisis.

Respite care - the patient receives short-term temporary hospice care in a facility to provide caregivers a rest.



AVAILABILITY - There are no Certificate of Need authorized inpatient hospice beds in Baldwin County. Baldwin County is in Planning Region XIII which includes Baldwin, Mobile, and Washington counties. Currently there are 46 CON approved inpatient hospice beds in Region XIII, all of which are located in Mobile County.

ACCESSIBILITY - Baldwin County is the largest geographic county in Alabama. Access to existing inpatient hospice providers is challenged due to distance and traffic congestion between Baldwin and Mobile counties.

The distance from major Baldwin County municipalities to the two existing inpatient hospice providers in Region XIII is challenging:

City	Mileage	
	SAAD	USA Providence
Bay Minette	39.3	39.1
Fairhope	30.8	32.9
Foley	51.0	53.0

Bing Maps Microsoft Bing

COST - 94% of patient days for the hospice providers that serve Baldwin County were covered by Medicare as reported on the most recent SHPDA Annual Reports. In addition, hospice services are covered by Medicaid and private insurers.



Alabama State Health Plan

410-2-4-.15 Inpatient Hospice Services

(1) Discussion

- (b) A hospice program is required by federal statutes as a Condition of Participation for hospice care (Title 42-Public Health; Chapter IV-CMS, Department of Health and Human Services; Part 418-Hospice care; Section 418.98 or successors) and state statutes and regulations (Alabama State Board of Health, Department of Public Health; Administrative Code, Chapter 420-5-17; Section 4200-5-17-.01 or successors) to provide general inpatient level of care and inpatient respite level of care as two of the four levels of hospice care.**

QUALITY OF THE HEALTHCARE -

Alabama State Health Plan

410-2-4-.15 Inpatient Hospice Services

(5) Quality

- (a) Quality is that characteristic which reflects professionally and technically appropriate patient services. Each provider must establish mechanisms for quality assurance, including procedures for resolving concerns identified by patients, physicians, family members, or others in patient care or referral. Providers should also develop internal quality assurance and grievance procedures.**
- (b) Providers are encouraged to achieve a utilization level which promotes the most cost effective service delivery.**



(c) Hospice programs are required to meet the most stringent or exceed the current Medicare Hospice Conditions of Participation, as adopted by CMS, and codified in the Code of Federal Regulations, along with State Licensure Regulations of the Department of Public Health.

Hospice quality scores are published on the CMS Medicare Compare web site: [medicare.gov/care-compare](https://www.medicare.gov/care-compare). Alabama hospice quality scores are higher (better) in every category compared to the national average:

Family caregiver survey summary rating

Question	National Average	Alabama Average
Communication with family	81%	86%
Getting timely help	77%	83%
Treating patient with respect	90%	93%
Emotional and spiritual support	90%	91%
Help for pain and symptoms	74%	79%
Training family to care for patient	75%	81%
Rating of this hospice	81%	85%
Willing to recommend this hospice	84%	88%

CAHPS Hospice Survey 04/01/2021-03/31/2023



Quality of patient care

Question	National Average	Alabama Average
Patients who got an assessment of all 7 HIS quality measures at the beginning of hospice care to meet the HIS Comprehensive Assessment Measure requirements	91.5%	97.7%
Percentage of patients who received visits from a registered nurse or medical social worker on at least 2 of the final 3 days of their life	47.9%	67.2%
Hospice Care Index score (0-10)	8.8	9

07/01/2022-06/30/2023, 01/01/2021-12/31/2022, 01/01/2021-12/31/2022



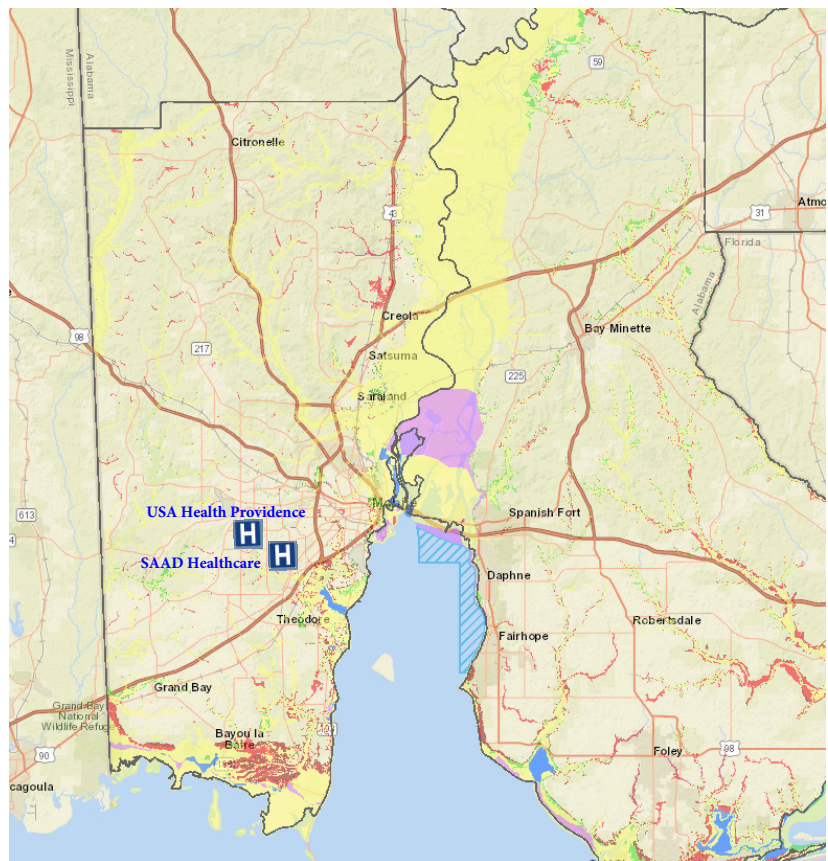
(C) SERVICE AREA

Region XIII is comprised of Baldwin, Mobile, and Washington counties:

Region XIII



Region XIII Providers



(D) POPULATION PROJECTIONS

Region XIII

Population Projections Aged 65 and Over

County	2025	2030	2035	2040	Growth
Baldwin	56,876	66,159	72,875	78,769	38.5%
Mobile	78,836	86,072	88,252	88,908	12.8%
Washington	3,589	3,854	3,936	3,872	7.9%

US Census/CBER, UofA April 2018

Baldwin County has the 4th largest senior population in the State and that demographic is expected to grow by over 38% from 2025 - 2040. Mobile County has the 2nd largest senior population in Alabama.

In addition, the median age in Baldwin County is the oldest of Region XIII and the senior demographic makes up the largest percentage of total population in Baldwin County. Note, the median age in Alabama is 39.6

2022 American Community Survey

	Baldwin	Mobile	Washington
Median Age	44.5	37.9	43.7
65+ % of Pop	21.9%	17.4%	19.8%

2022 American Community Survey

According to the Centers for Disease Control (CDC), the leading cause of death for seniors age 65 and older is:

Death Rate per 100,000

Heart Disease 1,015.9
Cancer 810.2

2022 CDC



(E) NEED FOR THE ADJUSTMENT

**Alabama State Health Plan
410-2-4-.15 Inpatient Hospice Services**

(6) Inpatient Hospice Facility Need Methodology

(a) Purpose. The purpose of this inpatient hospice services need methodology is to identify, by region, the number of inpatient hospice beds needed to assure the continued availability, accessibility, and affordability of quality of care for residents of Alabama.

(b) Basic Methodology

2. The need methodology shall be calculated by aggregating the reported average daily censuses (ADC) for all licensed hospices in the designated Region, as reported annually to SHPDA, and multiplying that aggregate regional ADC by 3%. The resulting figure shall be the regional need.

Accessibility to hospice care for Baldwin County residents appears to be limited based on an analysis of the 65 and older population in Region XIII and hospice utilization.

Residents age 65 and older in Baldwin County represent 41.8% of the senior population in Region XIII:

2022	Baldwin	Mobile	Washington
65 + Population	53,969	71,997	3,160

2022 American Community Survey



The senior population is consistent with the reported number of Medicare Enrollees. Baldwin County accounts for 39.9% of Region XIII’s Medicare population:

Medicare Enrollment

2023	Baldwin	Mobile	Washington
Medicare	64,002	91,927	4,476

CMS Medicare Claims Data thru Dec 2023/HealthPivots

However, according to SHPDA Annual Reports, Baldwin County residents accounted for only 25.4% and 24.2% of hospice patient days in Region XIII in 2023 and 2022 respectively:

Total Patient Days by County

Year	Baldwin	Mobile	Washington
2022	102,428	309,905	10,953
2023	112,050	316,548	12,981

Hosp-2 Report, Admissions by County of Residence SHPDA Annual Reports

Total hospice patient days reported by CMS Medicare Claims data shows a growing trend in the number of hospice patient days for Baldwin County Medicare recipients while Mobile County is trending fewer patient days:

Medicare Hospice Patient Days

Year	Baldwin	Mobile	Washington
2021	150,894	322,505	11,157
2022	157,563	286,578	13,727
2023	165,049	267,901	12,960

CMS Medicare Claims Data thru Dec 2023/HealthPivots



Projected 2023 Inpatient Hospice Bed Need by County based upon the Alabama State Health Plan Need Methodology:

Inpatient Hospice Bed Need

Report	Baldwin	Mobile	Washington
SHPDA	9.2	26.0	1.1
CMS	13.6	22.0	1.1

2023 SHPDA Annual Reports/2023 CMS Medicare Claims

(F) UTILIZATION

CURRENT UTILIZATION

According to 2023 SHPDA Annual Hospice Reports, there were only 24 CON authorized inpatient hospice beds operational in Region XIII with a reported total of 5,615 inpatient patient days.

Based on CMS Medicare Claims data through December 2023, it appears that hospice services are underutilized in Region XIII:

2023	Resident Deaths	Hospice Deaths	Death Service Ratio
Baldwin	2,219	1,368	.62
Mobile	3,794	1,916	.51
Washington	170	88	.52
Region XIII	6,183	3,372	.55

CMS Medicare Claims Data thru Dec 2023/HealthPivots

Utilization of hospice services is higher for Medicare residents of Baldwin County, however, only 55% of all Medicare recipients in Region XIII died receiving hospice services.



PROJECTED UTILIZATION

Based on 2023 SHPDA Hospice Annual Reports hospice patient days and population growth estimates, Region XIII patient days are projected to be:

Hospice Patient Day Projections

Area	2025	2030	2035	2040
Baldwin	133,127	154,855	170,575	184,370
Mobile	329,800	359,482	370,266	373,969
Washington	18,382	19,669	20,062	19,661
Region XIII	481,309	534,006	560,903	578,000

Resulting in the following projected Baldwin County inpatient hospice bed need based on the State Health Plan methodology:

Projected Inpatient Hospice Bed Need

Area	2025	2030	2035	2040
Baldwin	10.9	12.7	14.0	15.2

(G) STAFFING

Ten (10) inpatient hospice beds in Baldwin County would necessitate additional staffing. A broad array of healthcare professionals are drawn to Baldwin County as reflected by the number of medical entities shown in the Alabama Department of Public Health facility directory:



**4 Hospitals
8 Nursing Homes**

**7 In-Home Hospice Agencies
9 Home Health Agencies**

In addition, there are several colleges, universities, and community colleges in the area which provide training and education of healthcare professionals:



University of South Alabama



Coastal Alabama Community College



Pensacola State College



University of West Florida



Bishop State Community College



Fortis Institute Mobile/Pensacola



Remington College Mobile



(H) EFFECT ON EXISTING FACILITIES OR SERVICES

Given the demonstrated underutilization of inpatient hospice care for Baldwin County residents, little to no effect should be experienced by the existing providers in Region XIII.

In addition, the Mobile County Medicare population appears to be underserved as evidenced by a .51 Death Service Ratio in 2023. Projecting a .61 Death Service Ratio in Mobile County (equal to that of Baldwin County) would have resulted in 398 more hospice patients in 2023.

(I) COMMUNITY REACTION

Excerpts from Letters of Support (attached) :

Unfortunately Baldwin county is totally under served for hospice transitions. this is a huge disadvantage to families that are struggling with the final days or weeks of their loved ones life.

**Jimmie G. Gavras Jr. M.D.
Infirmary Surgical Specialists**

Our residents need and deserve this vital service.

**Craig Dowden, M.D.
Family Practice Associates**

Dedicated inpatient hospice services in Baldwin County will complement the existing healthcare delivery system.

**Ormand P. Thompson
Thomas Hospital**

**Kenny Breal
North Baldwin Infirmary**





Emily T. Marsal, Executive Director
P.O. Box 303025
Montgomery, AL 36130-3025

RE: State Health Planning and Development Agency

Ms. Marsal,

This letter is in support of a certificate of need request for inpatient hospice services in Baldwin county. I have been a practicing general surgeon in this area for 23 years and have had the opportunity to care for many patients and family members. Thru out my career it has become clear that many patients and families are simply not prepared for the complexities of end of life care.

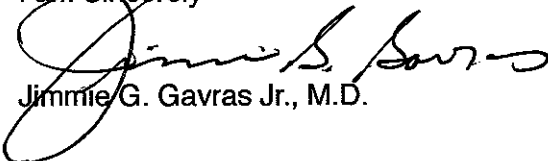
Unfortunately Baldwin county is totally under served for hospice transitions. As you are aware the closest inpatient units are currently in Mobile and Pensacola. Although these locations would appear close on a map I can assure you this is a huge disadvantage to families that are struggling with the final days or weeks of their loved ones live.

Dr. Craig Dowden has been a huge advocate for this type of care. It is thru Dr. Dowden that Thomas Hospital has a palliative care service, he is passionate about the care provided and he performs an outstanding service for the Hospital, other area providers, and the community at large. The service he provides would be complete with the addition of a free standing inpatient facility here in Baldwin county.

On a personal note, my mother recently passed at the age of 87 while at home surrounded by her family on the farm she grew up on with home hospice care in Covington county. South of Montgomery and as far east as Dothan there are only the two inpatient facilities that I have already mentioned, one of which is not even in state. This is only to underscore the intense need for inpatient hospice services in our community.

It is without reservation that I strongly recommend that the requested certificate of need for inpatient hospice services and facility for Baldwin county be granted.

I am Sincerely



Jimmie G. Gavras Jr., M.D.



FAMILY PRACTICE ASSOCIATES

770 MIDDLE STREET
FAIRHOPE, ALABAMA 36532
PHONE (251) 928-1191

WILLIAM C. BINGHAM, M.D.
STEPHEN E. WINSTON, M.D.
CRAIG M. DOWDEN, M.D.

SARAH GONZALEZ, CRNP
STACEY R. KING, CRNP
BLAKE HIGGINS, PA

Emily T. Marsal, Executive Director
P.O. Box 303025
Montgomery, Alabama 36130-3025

RE: State Health Planning and Development Agency

Dear Ms. Marsal,

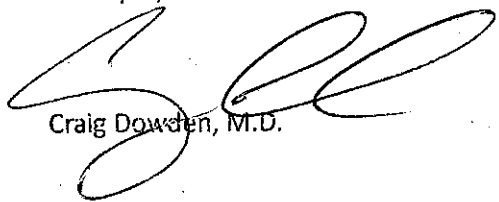
My name is Dr. Craig Dowden, a family physician practicing in Fairhope, Alabama since 2008. In 2015 I began serving as medical director for a local hospice agency and in 2017 I started a palliative care consult service at Thomas Hospital in Fairhope. I am writing to request that you consider granting a certificate of need for inpatient hospice services in Baldwin county.

The palliative care service at Thomas Hospital had over 500 consults in 2022, and a large percentage of these resulted in discharges to home or inpatient hospice. As you know, Baldwin County is one of the fastest growing counties in Alabama and senior citizens make up a significant portion of our population. The closest inpatient hospice unit to Thomas Hospital is 37.1 miles away in Mobile. To get there from Baldwin county, you must cross Mobile Bay which for residents of Baldwin County, may as well be the Atlantic Ocean. Traffic is terrible over the Bayway bridge and travel times can range from 45 minutes to over 2 hours. Traffic is extremely heavy between the months of March and September due to beach travelers. I have many patients in my private clinic who refuse to go to Mobile for any specialty care due to these traffic difficulties.

As the palliative physician at Thomas Hospital, I have seen first-hand how beneficial an inpatient hospice unit would be for the residents of Baldwin county. For complex patients in Baldwin county requiring inpatient hospice care, their only options are GIP hospice at Thomas Hospital or driving across the bay to Mobile with the traffic issues previously mentioned. Doing GIP hospice at Thomas Hospital is not ideal because unfortunately much of the hospital staff is not hospice minded or trained. I have seen this result in patients not receiving comfort medications in adequate doses or intervals. Baldwin County has three hospitals yet not a single inpatient hospice unit to serve them. For patients of South Baldwin Hospital in Foley, the closest hospice units are actually in Pensacola, FL.

I am passionate about hospice and palliative medicine and have been working to find a hospice company willing to place an IPU in Baldwin county for several years. St. Joseph Hospice is willing and able to provide this important service as they have several IPUs in Louisiana and Mississippi. I ask you to strongly consider granting a certificate of need for inpatient hospice services in Baldwin County. Our residents need and deserve this vital service.

Thank you,


Craig Dowden, M.D.



**INFIRMARY
HEALTH**

More devoted to *Your* life.

July 8, 2024

Ms. Emily T. Marsal, Executive Director
State Health Planning and Development Agency
100 North Union Street, Suite 870
Montgomery, AL 36104

RE: Inpatient Hospice Service
Baldwin County

Dear Ms. Marsal:

Thomas Hospital in Fairhope and North Baldwin Infirmary in Bay Minette are the market leader hospitals in Baldwin County providing comprehensive inpatient and outpatient healthcare services. Baldwin County continues to experience population growth - in fact, the 65 and older demographic is now the 4th largest in Alabama.

Dedicated inpatient hospice services in Baldwin County will complement the existing healthcare delivery system. The decision to enter into hospice care is often difficult for a patient and their loved ones - having convenient access to dedicated end-of-life care however can help ease this challenging time.

We support the proposed plan to add inpatient hospice beds in Baldwin County.

Sincerely,

Ormand P. Thompson
President, Thomas Hospital

Kenny Breal
President, North Baldwin Infirmary