

### STATE HEALTH PLANNING AND DEVELOPMENT AGENCY

#### 100 NORTH UNION STREET, SUITE 870 MONTGOMERY, ALABAMA 36104

NOTICE

DATE:

October 20, 2025

TO:

Applicant and Interested Parties

FROM:

Emily T. Marsal

**Executive Director** 

**SUBJ:** 

Proposed State Health Plan Adjustment submitted by Amedisys Home Health

PA 2026-001

A Plan Adjustment, designated PA2026-001, has been accepted as complete on October 20, 2025. Persons other than the applicant have thirty (30) days from October 20, 2025, 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 <a href="mailto:shpda.alabama.gov">shpda.alabama.gov</a>, 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 <a href="www.shpda.alabama.gov">www.shpda.alabama.gov</a>, under Announcements/SHP/Proposed Adjustments & Amendments /PA2026-001-410-2-4-.07 Home Health - Amedisys Home Health, a Lawrence Medical Center Partner, LLC.

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 <a href="https://www.shpda.alabama.gov">www.shpda.alabama.gov</a>, 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:



October 20, 2025

	DESCRIPTION OF PROPOSED FACILITY AND/OR SERVICE									
1.	Plan Adjustment No.: PA2026-001	2. TYPE FACILITY: Home Health	3. COUNTY: Lawrence							
4.	NAME OF APPLICANT: Amedisys Home Health, a Lawrence Medical Center Partner, LLC d/b/a Amedisys Home Health, a Lawrence Medical Center Partner									
5.	5. BRIEF DESCRIPTION OF ADJUSTMENT (Change in bed capacity, service, equipment, units proposed, etc.): The applicant proposes an adjustment to Section 410-2-407, Home Health, 2024-2027 Alabama State Health Plan, to show a need for home health services in Lawrence County.  REVIEW SCHEDULE									
_	REVIEW PERIOD BEGINS (D.	A 37 1).								
6.	October 20, 2025	AY 1):								
6. 7.	October 20, 2025	ISHING TO SUBMIT INFORMA	TION IN OPPOSITION TO OR							

# APPLICATION FOR ADJUSTMENT TO THE ALABAMA STATE HEALTH PLAN

## **Submitted by:**

Amedisys Home Health, a Lawrence Medical Center

Partner, LLC

d/b/a Amedisys Home Health, a Lawrence Medical Center

**Partner** 

Lawrence County, Alabama



PA2026-001 RECEIVED Oct. 03, 2025

STATE HEALTH PLANNING AND DEVELOPMENT AGENCY

October 3, 2025

Stephen M. Angelette (214) 661-5563 <a href="mailto:sangelette@polsinelli.com">sangelette@polsinelli.com</a>

Via Email: <a href="mailto:shpda.alabama.gov">shpda.alabama.gov</a>

Emily T. Marsal Executive Director State Health Planning & Development Agency 100 North Union St., Suite 870 Montogomery, AL 36104

#### Re: Proposed Plan Adjustment to the Alabama State Health Plan – Lawrence County

Dear Ms. Marsal:

On behalf of Amedisys Home Health, a Amedisys Home Health, a Lawrence Medical Center Partner, LLC d/b/a Amedisys Home Health, a Lawrence Medical Center Partner, we have identified a need for a home health agency in Lawrence County, Alabama. We are submitting this request to initiate a review and request an adjustment of the existing State Health Plan to address an impending service gap.

Should you have any questions regarding this request for plan adjustment, please do not hesitate to contact me by email at <a href="mailto:sangelette@polsinelli.com">sangelette@polsinelli.com</a> or by calling (214)-661-5563.

Very truly yours,

**POLSINELLI PC** 

Stephen M. Angelette

Atlanta | Boston | Chattanooga | Chicago | Dallas | Denver | Fort Lauderdale | Fort Worth | Houston Kansas City | Los Angeles | Miami | Nashville | New York | Park City | Philadelphia | Phoenix | Raleigh Salt Lake City | San Diego | San Francisco | Seattle | St. Louis | Washington, D.C. | Wilmington

#### I. IDENTIFICATION OF APPLICANT.

Applicant Name: Amedisys Home Health, a Lawrence Medical Center Partner, LLC

d/b/a Amedisys Home Health, a Lawrence Medical Center Partner

Address: 14765 Court Street

Moulton, AL 35650-1263

Lawrence County

Telephone: (256) 974-2298

Contact Person: Stephen M. Angelette

4020 Maple Avenue

Suite 300

Dallas, TX 75219 (214) 661-5563

sangelette@polsinelli.com

#### II. PROJECT DESCRIPTION.

Provide a narrative statement explaining the nature of the request, with details of the plan adjustment desired. (If the request is for additional beds, indicate the number and type, i.e., Psychiatric, Rehabilitation, Pediatric, Nursing Home, etc.) The narrative should address availability, accessibility, cost, quality of the health care in question, and state with specificity the proposed language of the adjustment.

#### A. Overview.

Amedisys Home Health, a Lawrence Medical Center Partner, LLC d/b/a Amedisys Home Health, a Lawrence Medical Center Partner ("Amedisys Home Health") petitions the Alabama Statewide Coordinating Council ("SHCC") for an adjustment to the Home Health Section of the State Health Plan, Ala. Admin. Code r. 410-2-4-.07, in order to continue delivering critical home health services in Lawrence County and contiguous counties. This adjustment is essential to meet the growing need for home health care in the Service Area and to ensure continuity of care for existing patient populations.

Home health agencies provide a broad range of specialized services including skilled nursing, home health aides, physical therapy, occupational therapy, speech therapy, medical social work, pain and medication management, wound care, infusion therapy, and psychiatric services to patients. These services are not only clinically essential but also enable patients to remain comfortable in their homes while receiving quality care, which reduces recovery complications, hospital readmissions, and overall healthcare costs.

In 1993, Lawrence Medical Center requested and received a letter of non-reviewability from the Alabama State Health Planning and Development Agency ("SHPDA"), pursuant to the 1993 Code of Alabama § 22-21-263(a)(4) (now codified at Code of Ala. § 22-21-463(a)(4) (2024). This approval allowed Lawrence Medical Center to operate a home health agency without a Certificate of Need ("CON") under an exemption for entities with rural hospital provider ownership. Lawrence Medical Center has operated Amedisys Home Health, more recently with its joint venture partner, Amedisys Inc., for the last 32 years. Unfortunately, on May 23, 2025, Lawrence Medical Center ceased operating and permanently closed. As a result of the hospital's cessation of operations, the exemption from CON requirements for the home health agency is no longer applicable and Amedisys Home Health's authority to operate without a CON will expire on May 23, 2026.

Under the current statistical report, the State Health Plan has determined that there is no need for any additional home health agencies in Lawrence County. This proposed adjustment to the State Health Plan directly addresses the imminent care gap expected to arise in mid-2026 and aims to prevent a significant disruption in services currently provided. Currently, only three home health agencies operate in Lawrence County. Amedisys Home Health is one of them and has operated under a Certificate of Need exemption that is no longer operative.

If this adjustment is not effectuated and Amedisys Home Health is forced to close, Lawrence County will be left with only two agencies – falling below the current State Health Plan's determination of need to adequately serve the population. This proposed adjustment addresses exactly that, ensuring that Alabama communities continue to have reliable access to home health services as they do currently and avoid creating a severe burden on the remaining agencies, compromising quality care, timeliness and patient outcomes.

Over the past four years, Amedisys Home Health has provided care to an average of approximately 160 patients annually and has consistently maintained an average of over 800 patient admissions each year. These figures reflect a sustained and stable demand for home health services in the Service Area, underscoring Amedisys Home Health's important role in providing home health services in the community.

#### B. Availability.

Currently, Lawrence County meets the State Health Plan's home health need methodology assessment that determines that three operating home health agencies are necessary to serve the population. However, with the impending closure of Amedisys Home Health due to the expiration of the Certificate of Need, the county will fall below the established threshold. This would leave only two agencies to provide services to a population that data already shows requires three. The remaining two agencies will not be able to absorb this increased demand effectively, creating an access issue for patients. These circumstances reflect a unique and urgent service gap that Amedisys Home Health seeks to address through this proposed plan adjustment, preventing disruption in care.

#### C. Accessibility.

Amedisys Home Health provides home health services across Lawrence, Lauderdale, Limestone, Morgan, Winston, Franklin, and Colbert counties, many of which are rural and underserved areas. Indeed, of the foregoing contiguous counties served by Amedisys Home Health – Limestone – has been determined to need additional home health providers by SHPDA in its Statistical Update for the 2024-2027 Alabama State Health Plan for home health agencies. This plan adjustment addresses the imminent need that patients in these counties will face due to the closure of a key home health agency. Should Amedisys Home Health close, around 500,000 people will lose access to critical home health care in the above listed counties. It is unlikely that the remaining two agencies in Lawrence County will have the capacity to meet the increased need without delays, reduced visit frequencies, or waitlists. By maintaining operations through this proposed plan adjustment, Amedisys Home Health will continue to fill a critical accessibility gap ensuring patients continue to receive care in the Service Area.

#### D. Cost.

There is no additional cost to continue to operate Amedisys Home Health. The infrastructure, providers, administrators, staff, and operating systems are already in place. Amedisys Home Health has been serving the community for over 30 years and is fully equipped to continue providing care using its existing resources. This proposed plan adjustment will allow the facility to continue utilizing its existing resources without the higher additional costs of establishing a new home health agency from the ground up to meet the determined need. Continuing operations at Amedisys Home Health is the most cost-effective solution to meet the documented need of three home health agencies in Lawrence County and contiguous counties.

#### E. Quality of Care.

Amedisys Home Health is certified to participate in both Medicare and Medicaid programs and consistently delivers professional and effective home health services across its seven-county service area. Amedisys Home Health maintains internal quality assurance mechanisms and procedures to address concerns raised by patients, families, physicians, and other referral sources that ensure continuous evaluation and improvement of care. These efforts are reflected in Amedisys Home Health's strong performance on key quality measures such as timely initiation of care, management of pain, improvement in mobility, and prevention of hospital readmissions, demonstrating its commitment to positive patient outcomes and safety. With a comprehensive team of providers, nurses, administrative and support staff, Amedisys Home Health ensures that patients receive care that meets regulatory standards and individual medical needs. Approval of this plan adjustment will allow Amedisys Home Health to continue delivering high-quality home health care without interruption to the communities that rely on these services.

#### F. Proposed Plan Adjustment.

We agree with the need methodology's determination that three home health agencies are required in Lawrence County. Understanding that Amedisys Home Health's continued operation of its home health agency will cease on May 23, 2026, a new CON must be authorized to allow providers to continue meeting the need determined by the State Health Plan's home health agency need methodology. If a new CON is authorized, Amedisys Home Health would immediately file its Letter of Intent to become eligible for the receipt of a CON so that might be allowed to continue serving the patient population to which it has provided services for the past 30+ years.

#### III. SERVICE AREA.

Describe the geographical area to be served. (Provide an  $8\frac{1}{2}$ " x 11" map of the service area. The map should indicate the location of other similar health care facilities in the area.

The service area consists of Lawrence, Lauderdale, Limestone, Morgan, Winston, Franklin, and Colbert Counties ("Service Area"). A map of the Service Area is attached as **Exhibit A**.

#### IV. POPULATION PROJECTIONS.

Provide population projections for the service area. In the case of beds for a specific age group, such as pediatric beds or nursing home beds, document the existence of the affected population. An example for nursing home beds is the number of persons 65 and older. The applicant must include the source of all information provided.

Currently, Amedisys Home Health serves a population area of over 475,000 residents, which consists of nearly 10% of the population of Alabama. This multi-county service area is projected to grow over 2.5% in the next five years and is projected to continue increasing in the next decade. The requested plan adjustment will serve the current and growing population in the Service Area.

<u>Table 1</u>										
Total Population Projection, 2025-2030										
County	2025	2030	Percent Change (%)							
Lawrence	32,070	31,420	-2.02%							
Lauderdale	93,591	94,074	0.52%							
Limestone	114,427	124,420	8.7%							
Morgan	123,847	124,933	0.88%							
Winston	22,876	22,438	-1.91%							
Franklin	32,014	32,110	0.30%							
Colbert	58,482	59,844	2.33%							
<b>Total Service Area</b>	477,307	489,239	2.50%							
Alabama	5,100,644	5,197,874	1.91%							

Source: U.S. Census Bureau and Center for Business and Economic Research, The University of Alabama, October 2024.

The steadily increasing population will face a service gap if Amedisys Home Health is forced to cease operations in 2026. Thus, the current population and projections show a need for this plan adjustment.

#### V. NEEDS FOR ADJUSTMENT.

Address the current need methodology. If the application is to increase beds or services in a planning area, give evidence that those beds or services have not been available and/or accessible to the population of the area.

This request is not seeking a change to the State Health Plan to add a new facility, but rather to maintain services that already align with the determination of need for home health agencies in Lawrence County and contiguous counties. The State Health Plan methodology supports the operation of three home health agencies in the county. Amedisys Home Health has an existing patient base and utilization of services that has remained steady based on population aging and

increased demand for home health care services. Amedisys Home Health operates with a fully staffed team of experienced nurses and administrators, along with a well-established facility and comprehensive infrastructure, all of which deliver high-quality, accessible home health care services to meet the needs of the current population in the Service Area.

Because of the time required for the Alabama CON process, this plan adjustment remains the only viable option to avoid disruption in care and maintain adequate access for patients in the Service Area. To emphasize, our request is not for approval of a new home health agency in Lawrence County, but to address the impending limitation that Lawrence County is facing due to the expiration of the CON exemption under which Amedisys Home Health was previously operating.

Without this plan adjustment, there would be a significant gap in service and force patients to either go without care or create a heightened burden on current providers who are operating at capacity. The recent closure of Lawrence Medical Center has only heightened the urgency of maintaining home health services in this rural area. Amedisys Home Health seeks to continue meeting the needs of the community, consistent with the State Health Plan need determination.

Table 2 Alabama Home Health Agencies in Service Area						
Lawrence	2*					
Lauderdale	3					
Limestone	4					
Morgan	3					
Winston	1					
Franklin	3					
Colbert	2					

Source State of Alabama, Alabama Public Health Bureau of Health Provider Standards Healthcare Facilities Directory Home Health Agencies Report, September 29, 2025

#### VI. CURRENT AND PROJECTED UTILIZATION.

Provide current and projected utilization of similar facilities or services within the proposed service area.

This proposed State Health Plan adjustment is necessary to continue meeting the needs of Lawrence County and contiguous counties. Amedisys Home Health has a strong consistent record

<sup>\*</sup>There are currently three home health agencies operating in Lawrence County. This figure reflects the number of agencies that will remain open should this plan adjustment be denied, falling below the State Health Plan's determination of need for three home health agencies required to adequately serve the geographic service area.

in the Service Area and maintains a stable patient census that reflects community demand for home care services. As mentioned above, Amedisys Home Health's services are continuously being utilized in the Service Area. Please refer to <u>Table 3</u> for patient census and admissions. statistical data.

Table 3 Amedisys Home Health Patient and Admissions Census												
Year	2022		2023		2024		2025					
County	Patient	Admissions	Patient	Admissions	Patient	Admissions	Patient	Admissions				
	Census		Census		Census		Census					
Lawrence	49	224	60	240	71	276	80					
Lauderdale	1	1	1	1								
Limestone												
Morgan	92	446	115	517	71	421	80					
Winston			1	2	1	2						
Franklin	21	96	20	77	9	92	16					
Colbert			1	5	1	4						

Source: Internal Amedisys Home Health patient census and admissions data from Jan 1, 2022 – September 29, 2025

#### VII. ADDITIONAL STAFFING.

If additional staffing will be required to support the additional need, indicate the availability of such staffing.

Amedisys Home Health does not anticipate the need for additional staffing or support as a part of this plan adjustment proposal Currently, personnel are already in place and actively providing care, with clinical, support, and administrative staff and providers expected to remain employed throughout this transition. If the need for additional staffing becomes imminent, Amedisys Home Health is confident in its ability to recruit qualified professionals, due to its long-standing presence in the region and strong reputation for delivering high quality home health services.

#### VIII. EFFECT ON EXISTING FACILITIES OR SERVICES.

Address the impact this plan adjustment will have on other facilities in the area both in occupancy and manpower.

This plan adjustment is not expected to have any adverse effects on other home health providers in the area. Amedisys Home Health's sole intent is to maintain existing services and continue meeting the already-established need for three home health agencies in Lawrence County. As such, there will be no impact on existing providers or staffing requirements.

#### IX. COMMUNITY REACTION.

Give evidence of project support demonstrated by local community, civic and other organizations. (Testimony and/or comments regarding plan adjustment provided by community leaders, health care professionals, and other interested citizens.)

The Huntsville Health System leadership team has expressed its full support of this request for plan adjustment because of the impending need for home health care services as a result of the loss of the Amedisys Home Health CON exemption.

#### X. ADDITIONAL INFORMATION.

Provide any other information or data available in justification of the plan adjustment request.

Recent developments in Alabama's rural healthcare landscape highlight the growing challenges faced by hospitals in maintaining inpatient and emergency services. The closure of inpatient and ER services at several rural hospitals, including the aforementioned Lawrence Medical Center, has increased the reliance on home health care providers to meet patient needs in these underserved areas. These changes underscore the critical role that well-established home health agencies play in ensuring continuity of care outside the hospital setting.

**EXHIBIT A**Geographic Service Area of Amedisys Home Health

