

**Shannon Drake**  
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404.868.2068



January 28, 2025

RV2025-023

**RECEIVED**

**Feb 10 2025**

STATE HEALTH PLANNING AND  
DEVELOPMENT AGENCY

Via Electronic Filing  
(shpda.online@shpda.alabama.gov)

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

Re: Good Samaritan Hospice of Madison, Inc. d/b/a Affinity Hospice  
SHPDA ID 089-P2460  
Request for Reviewability Determination for Address Correction to Hospice  
Administrative Office

Dear Ms. Marsal:

I am writing on behalf of Good Samaritan Hospice of Madison, Inc. d/b/a Affinity Hospice, an in-home hospice provider, (the "Agency") to request your determination, pursuant to Section 401-1-7-.02 of the Alabama Certificate of Need Program Rules & Regulations ("CON Rules"), that the Agency is not required to obtain a new Certificate of Need ("CON") to correct the address of the administrative office of the Agency to reflect its current and actual location. The appropriate reviewability fee in the amount of \$1000 is attached to the original paper filing as identified above. To assist with this determination, we offer the following information:

Good Samaritan Hospice of Madison, Inc. dba Affinity Hospice (the "Hospice") previously notified SHPDA of its intent to relocate one of its hospice locations from 540 Hughes Road, Suite 12, Madison, AL 35758 (the "Old Address") to a new location at 2705 Artie Street, Building 500, Suite 36 and 37, Huntsville, AL 35805 (the "New Address").

Unfortunately, due to unforeseen circumstances, the landlord for the New Address has leased the property to an unrelated third-party. The Hospice is now unable to relocate to the New Address as previously intended. Accordingly, the Hospice has and will remain at its Old Address (i.e., 540 Hughes Road, Suite 12, Madison, AL 35758). The Hospice has advised both the Medicare Administrative Contractor ("Palmetto") and the State of Alabama Department of Public Health ("ADPH") of the situation, that the Agency will remain in the Old Address. Moreover, the Hospice has advised Palmetto to terminate the change of information process for this location to allow it to remain in the Old Address and requested ADPH to issue a new license reflecting the Old Address.

The Agency's administrative office is currently located and has remained at the Old Address (540 Hughes Road, Suite 12, Madison, AL 35758). Administratively updating the Agency's administrative office (to reflect its current location) will not involve (i) the addition or conversion of any beds, (ii) the acquisition of stock or assets, (iii) any change in services offered

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by the Agency, or (iv) any capital expenditures in excess of the threshold amounts set forth in CON Rule § 410-1-4-.01 (\$3,241,543 for major medical equipment, \$1,296,615 for new annual operating costs, and \$6,483,085 for other capital expenditures). Finally, there will be no changes in staff, management, or service area of the Agency as a result of the proposed correction.

Based upon the above, we respectfully request your determination that Good Samaritan Hospice of Madison, Inc. d/b/a Affinity Hospice is not required to obtain a CON in order to complete the administrative correction/project as described in this letter. We appreciate your consideration of this request, and welcome the opportunity to address any questions regarding this matter. Should you have any questions or need further information, please contact Shannon Drake at 404-868-2068 or [sdrake@bradley.com](mailto:sdrake@bradley.com). Thank you in advance for your assistance with this matter.

Best regards,

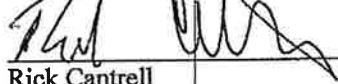


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Affirmation of Requesting Party:

The undersigned, being first duly sworn, hereby makes oath or affirms that he, as Chief Executive officer, has knowledge of the facts in the attached Reviewability Determination Request for Good Samaritan Hospice of Madison, Inc. d/b/a Affinity Hospice and to the best of his information, knowledge and belief, such facts are true and correct.



Rick Cantrell  
Chief Executive Officer

(SEAL)

SUBSCRIBED AND SWORN to before me this \_\_\_\_ day of \_\_\_\_\_, 2025.

Notary Public

My commission expires: \_\_\_\_\_

**Shannon Drake**  
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March 12, 2025

Via Electronic Filing  
(shpda.online@shpda.alabama.gov)

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

Re: Good Samaritan Hospice of Madison, Inc. d/b/a Affinity Hospice (the "Hospice")  
Request for Reviewability Determination for Address Correction  
SHPDA ID 089-P2460  
RV 2025-023

Dear Ms. Marsal:

I am responding to your February 13, 2025, letter regarding the above referenced matter and providing the additional information as requested.

**1. Please provide clarification concerning the complete ownership structure for the proposed project in Madison, AL.**

The Hospice is a wholly owned subsidiary of Affinity Hospice Holdings, LLC. No other healthcare facilities or physician groups have any ownership interest in the Agency and there is no change in the ownership structure of the Hospice because of this address correction. Please see the attached December 9, 2024 correspondence from this office for your review.

**2. Please provide clarification to this Agency as to the service are for the proposed project.**

Pursuant to CON 2460-HPC, the Hospice has the authority to provide in-home hospice services in the following counties: Cullman, Franklin, Jackson, Lawrence, Marshall, Colbert, Lauderdale, Limestone, Madison, and Morgan. The Hospice's location will remain in its current location, 540 Hughes Road, Suite 12, Madison, AL 35758, which is in Madison County, Alabama.

**3. Please reference the Certificate of Need (CON) associated with this filing.**

CON 2460-HPC

**4. Confirm applicable CON thresholds.**

This letter confirms and reiterates that administratively updating the Hospice's office (to reflect its current location) will not involve (i) the addition or conversion of any beds, (ii) the

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acquisition of stock or assets, (iii) any change in services offered by the Agency, or (iv) any capital expenditures in excess of the threshold amounts set forth in CON Rule § 410-1-4-.01 (**\$3,379,066 for major medical equipment, \$1,350,305 for new annual operating costs, and \$6,751,537 for other capital expenditures**). The erroneous amount certified to in the January 28, 2025, correspondence is less than the threshold amount identified in CON Rule § 410-1-4-.01.

Based upon this supplemental information and the prior correspondence, we respectfully request your determination that Good Samaritan Hospice of Madison, Inc. d/b/a Affinity Hospice is not required to obtain a CON to complete the administrative correction/project as described.

Should you have any questions or need further information, please contact me at 404-868-2068 or [sdrake@bradley.com](mailto:sdrake@bradley.com).

Best regards,



Shannon Drake