

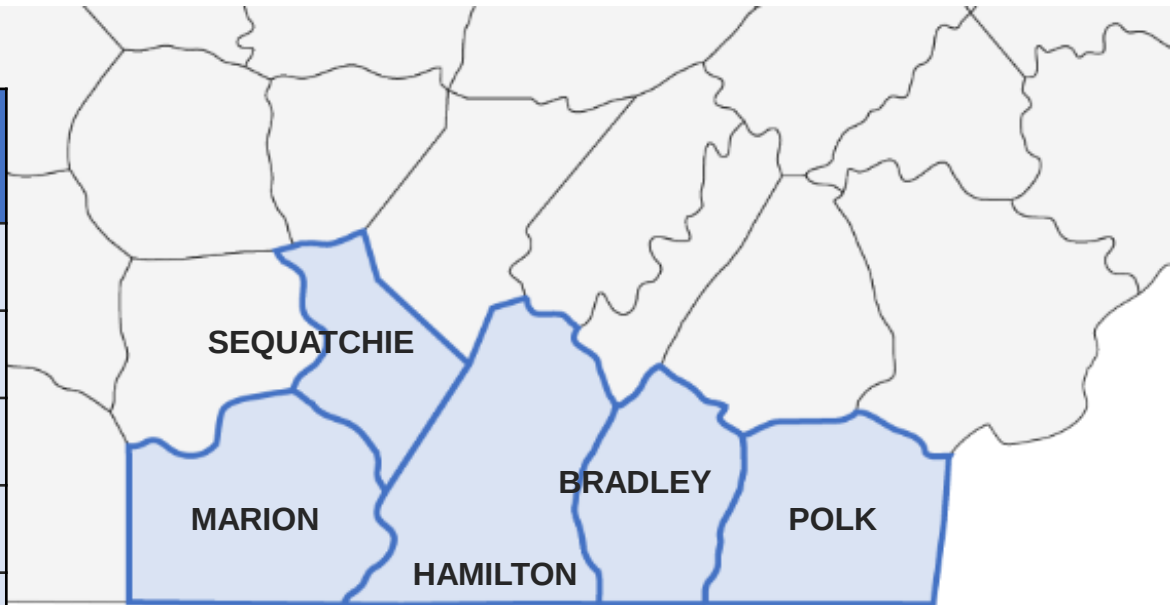


OPPOSITION TO SHALOM HOSPICE OF SOUTHEAST TENNESSEE

WIDELY OPPOSED BY AREA HOSPICES



County	# of Hospices
Marion	7
Sequatchie	8
Hamilton	8
Bradley	8
Polk	8



ABOUT HOC AND HEARTH

Hospice of Chattanooga

- Established in 1980 – *44 years* of hospice experience.
- Serves *21 counties* in Tennessee.
- In 2023, *2,464* unduplicated *SA patients*.

Hearth

- Experienced provider in Tennessee and Georgia.
 - Serves *9 counties* in Tennessee.
- In 2023, *1,521* unduplicated *SA patients*.

- Demonstrated *quality*.



SPIRITUAL RESOURCES FOR ALL PATIENTS

- Seeking *National Institute for Jewish Hospice* accreditation.
 - Expected *January 2025*.
 - Already operating with *NIJH-trained* clinicians.
- Team of nondenominational *spiritual counselors*.
 - Coordinate with clergy of patient's own faith.
- Bereavement resources tailored to *Jewish community*.



Spirituality and Religion

Many people who are grieving find comfort in spiritual or religious practices. Here are some articles that may be helpful, even if you are not a participant in organized religion.

Learning to Live with Loss

This article is written from an evangelical Christian perspective. Death of a Christian loved one, death tests us as it alters our experience in this world. [Live with Loss" here.](#)

Death and Mourning in Judaism

These resources are provided by Chabad.org. Even in the most difficult times, help us grow beyond our loss. [Continue exploring "Death and Mourning in Judaism" here.](#)

Death and Mourning

These resources are provided by ReformJudaism.org. The death of a loved one is a profound experience. Explore the centuries-old Jewish practices around death and mourning. [Continue exploring "Death and Mourning" here.](#)

SPIRITUAL RESOURCES FOR ALL PATIENTS

Your Life. Your Spirit. Our Commitment.

End-of-life care is unique for each individual, which is why our team creates an individual plan of care supporting medical, emotional, and spiritual needs for each patient.

Personal beliefs are important to our team. The Hearth team is committed to your individual end-of-life journey and is with you every step of the way, for the patient and loved ones.

Our spiritual counselors and chaplains provide end-of-life support without bias or prejudice. Be sure to connect with

We have created a list of resources that may be helpful, even if you are not of a specific faith background. Not all resources assume a faith background or participation in organized religion.



As a Hearth patient, in addition to the medical care for the patient, both the patient and loved ones will receive the benefit of a spiritual counselor as part of the Hospice care team. This team member is available to provide support including visits as requested, funeral or memorial services, and crisis support.

Jewish Faith Resources



Our Hospice of Chattanooga team has pulled together a list of available resources in our community. Our spiritual counselors are here for our patients and their loved ones to support needs beyond the medical care provided.

Destinations & Synagogues

- Jewish Cultural Center, funded by the Jewish Federation of Greater Chattanooga
- B'nai Zion Congregation
- Mizpah Congregation

Article

- <http://article.com>
- <http://article.com>

- <http://article.com>
- <http://article.com>

*these resources are available to our community if and when the needs arise.

To access the Halachic Living Will to Tennessee, visit: https://www.jlaw.com/Forms/hlw_tn.html

NO NEED FOR THE PROJECT

All service area counties have excess capacity for hospice services.

County	Hospice Penetration Rate (HPR) (Mean # Hospice Pts / Mean # Deaths)	% of TN HPR	# of Pts in Need of Hospice @ 80% SMHPR
Bradley	0.693	114%	(343)
Hamilton	0.930	153%	(1,959)
Marion	0.688	113%	(106)
Polk	0.583	96%	(42)
Sequatchie	0.913	150%	(92)
Service Area Total	0.845	139%	(2,542)
Tennessee	0.607		

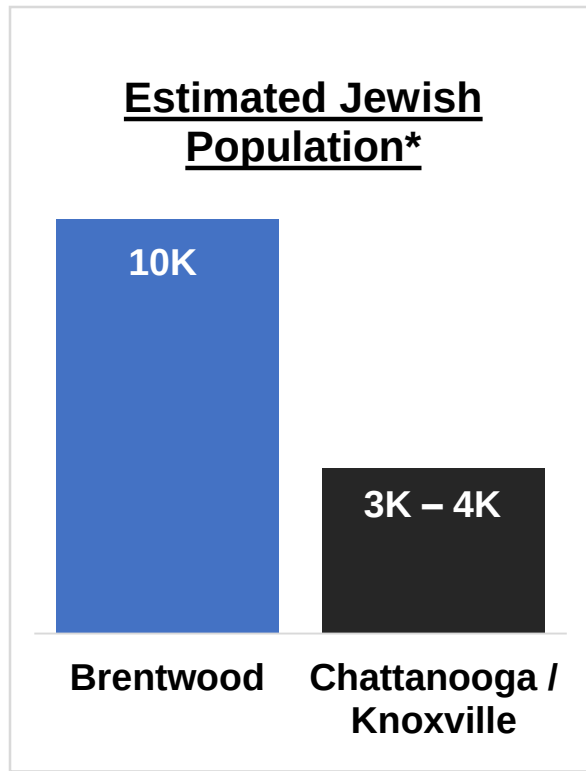
BROAD ACCESS TO HOSPICE IN SERVICE AREA

Proposed PSA has the *4th highest* hospice utilization rate in Tennessee – *1.5x* the statewide average.

HPR Rank Statewide	County	Hospice Penetration Rate (HPR) (Mean # Hospice Pts / Mean # Deaths)
1	Maury	0.946
2	Hamilton	0.930
3	Sequatchie	0.913
4	Shalom PSA	0.845
5	Rhea	0.826
6	Jefferson	0.820
	Tennessee	0.607

NO NEED FOR SHALOM PROJECTS

Shalom's existing hospices operate *well-below* projected targets and serve *only small numbers* of Jewish patients.

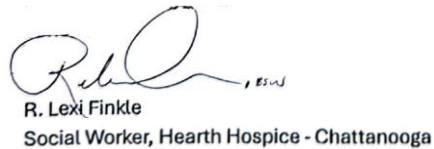


	Shalom Brentwood	Shalom Knoxville	Proposed Shalom Chatt.
Proj. Y1 Util.	107	81	79
Actual Util.	24	N/A	N/A
% Jewish Pts	12%	20%	?
Service Area HPR	0.661	0.640	0.845
Service Area Excess Capacity @ 80%	(1,897)	(2,371)	(2,542)

*Per Shalom estimates.

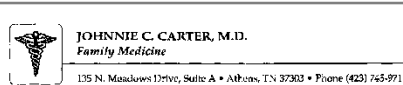
WIDELY OPPOSED BY OTHER AREA PROVIDERS


Johnnie Carter, M.D.


R. Lexi Finkle
Social Worker, Hearth Hospice - Chattanooga


Doyle Love
Administrator Signature HealthCARE


Bruce Pendley, M.D.


JOHNNIE C. CARTER, M.D.
Family Medicine
135 N. Masadown Drive, Suite A • Athens, TN 37303 • Phone (423) 745-9711

August 12, 2024

Mr. Logan Grant
Executive Director
Tennessee Health Facilities Commission
Andrew Jackson Building, 9th Floor
502 Deaderick Street
Nashville, Tennessee 37243

Re: **Opposition to Shalom Hospice of Southeast Tennessee LLC,**

Dear Mr. Grant:

I am a family medicine physician with a private practice in Athens, Tennessee. I am writing to you on behalf of other area providers who are opposed to Shalom Hospice's certificate of need application to offer hospice services in the Chattanooga area.



To whom it may concern,

I wanted to take an opportunity to directly address those tasked with the responsibility of reviewing new healthcare providers. It has come to my attention that there is a hospice organization seeking to join the ranks of our well-established care community in Chattanooga, and I understand that the reasoning is to provide intentionally direct care specifically to the Jewish community.

I am in a unique position to speak to this, having my feet firmly in both communities. I am a lifelong Jewish Chattanooga who has also gone on to pursue providing medical Social Work to the hospice community. I have had the privilege of working with, and for, many Jews in our area. Some that were previously known to me, and some that were not. There are a few universal truths for these Jews: 1. We are a world minority, representing a microscopic 0.2% of the world's population. And specifically to the Jewish faith.


Signature
HealthCARE
of South Pittsburg
Rehab & Wellness Center

August 6, 2024

Mr. Logan Grant
Executive Director
Tennessee Health Facilities Commission
Andrew Jackson Building, 9th Floor
502 Deaderick Street
Nashville, Tennessee 37243

Re: **Opposition to Shalom Hospice of Southeast Tennessee LLC, CN2406-01**

Dear Mr. Grant:

I serve as Administrator of Signature HealthCARE of South Pittsburg Rehab & Center ("Signature"), a 150-bed skilled and intermediate nursing facility in South Tennessee. On behalf of our facility and its residents, I write to oppose Shalom Hospice's certificate of need application to establish a hospice targeting persons of the Jewish faith in Chattanooga and the surrounding areas.

Signature provides clinical services, rehabilitation, care navigation and life enrichment programs to those in need of medical care, specializing in customized dementia and behavior programs for cognitively impaired residents. As a family-based organization, we pride ourselves on our environment where our residents can pursue personalized spiritual journeys. Through our ongoing critical programming, we are able to offer interfaith spirituality and quality of life programs that reflect the multi-ethnic, multi-cultural populations we serve.

Hospice of Chattanooga is a critical partner in helping us fulfill our resident-centered mission. Their hospice and palliative care services consistently meet the medical, emotional and spiritual needs of our residents and their families - regardless of their faiths and backgrounds. We are aware of the high quality hospice providers that exist in Chattanooga and the surrounding areas. These existing providers already provide culturally sensitive care that supports patients of all spiritual backgrounds, including Jewish patients. I have even had a Rabbi as my hospice patient. I witness this same compassionate care firsthand on a regular basis from all levels of caregivers, the CNAs, nurses, social workers, chaplains and physicians.

Shalom Hospice's mission, our service area has ample access to high quality hospice providers who can meet the spiritual needs of all terminally ill patients. For these reasons, we oppose the Health Facilities Commission to deny Shalom's application as unnecessary and duplicative of existing, well-functioning services in our area.

Sincerely,


Doyle Love
Administrator

SIGNATURE HEALTHCARE OF SOUTH PITTSBURG
REHAB & WELLNESS CENTER
301 E. 10th Street | South Pittsburg, TN 37380
(423) 887-7981 | SHC of South Pittsburg


Dr. Bruce Pendley MD
brucependley@yahoo.com

08/12/2024

Mr. Logan Grant, Executive Director
Tennessee Health Facilities Commission
Andrew Jackson Building, 9th Floor
502 Deaderick Street
Nashville, Tennessee 37243

Re: **Opposition to Shalom Hospice of Southeast Tennessee LLC, CN2406-016**

Dear Mr. Grant:

I have practiced in the greater Chattanooga area as a family medicine physician specializing in hospice and palliative care for more than 30 years. In addition to co-owning a primary care practice in Chattanooga, I also currently serve as Hospice of Chattanooga's medical director. On behalf of patients in my practice and our community of hospice providers, I write to express my opposition to Shalom Hospice's certificate of need project to establish a Jewish-focused hospice in Chattanooga. I believe patient-centered primary care is central to longevity - that is one of the many reasons our group offers special programs focused on aging patients who frequently struggle to access care in the medical office setting. Given this focus, I am passionate about ensuring my patients receive dignified end-of-life care. I am also well-aware of the high quality hospice providers that exist in Chattanooga and the surrounding areas. These existing providers already provide culturally sensitive care that supports patients of all spiritual backgrounds, including Jewish patients. I have even had a Rabbi as my hospice patient. I witness this same compassionate care firsthand on a regular basis from all levels of caregivers, the CNAs, nurses, social workers, chaplains and physicians.

For these and other reasons, the Commission should deny Shalom's duplicative and unnecessary project.

Sincerely,


Bruce Pendley, M.D.

"While we appreciate Shalom's mission, our service area has ample access to high quality hospice providers who can meet the spiritual needs of all terminally ill patients."

ABOUT CARIS HEALTHCARE



- **Tennessee Hospice Provider for 20+ Years**
- **Provides Hospice Services in Every County Proposed by Applicant**
- **Earned “Superior Caregiver” Recognition from *SHP Best***
- **Perfect CMS Hospice Care Index Score**

UNANSWERED QUESTIONS



How Many Jewish Residents in the Service Area



What Number Are Seeking Hospice Care



What Percentage Can't Access Hospice Care



How Many Are Not Being Treated Consistent With Their Religious Beliefs

APPLICANT'S STAFFING MINIMALLY DIFFERENT THAN EXISTING PROVIDERS



**Mr. Sam
Stern**

*CEO, Shalom
Hospice*

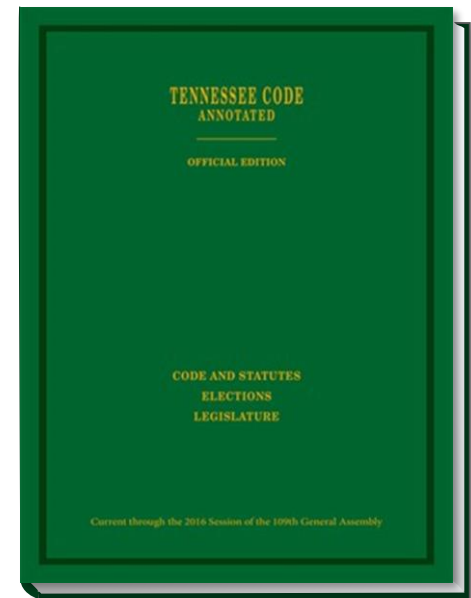
Yes. And, in fact, **in the Nashville program, we have a chaplain, a multi-faith chaplain, interfaith chaplain, that is not of the Jewish faith as well. Almost all of our nurses are not Jewish. Almost all of our home health aids are not Jewish. Our program director is not Jewish.**

Source: Shalom Hospice of Greater Knoxville HFC Meeting, July 26, 2023

NO CONSUMER ADVANTAGE

Consumer Advantage General Criteria

- Whether the effects attributed to competition or duplication would be **positive for the consumers** may be evaluated upon the following factors:
- (e) The availability and accessibility of human resources required by the proposal, including those required by existing providers.



APPLICATION SHOULD BE DENIED



No Need: Ample Access to Hospice Care with Multiple Competing Providers



No Need: No Evidence Jewish Community Lacks High Quality Hospice Care

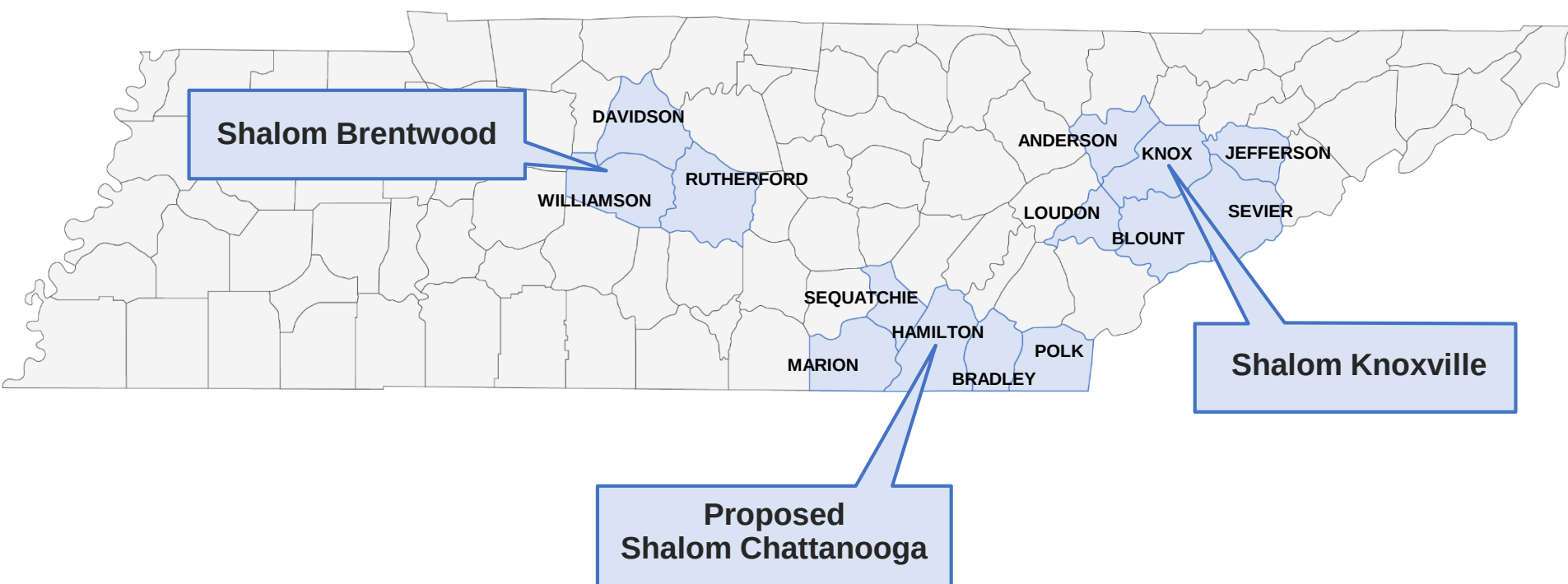


No Consumer Advantage: Negative Impact On Existing Provider's Ability to Staff

APPENDIX

SHALOM TARGETS URBAN AREAS

None of Shalom's service area counties show a need for hospice.



HOC & HEARTH SERVE RURAL AREAS

