



The CON document in its entirety
consisting of 74 pages is on file in
the Clerk of Council's Office

Elliott L. Coward
404-504-5412
ecoward@mmmlaw.com
www.mmmlaw.com

May 26, 2023

VIA FEDERAL EXPRESS

Sandra Davis, Clerk of Council
Columbus Consolidated Government
100 10th Street, 6th Floor
Columbus, GA 31901

Re: **Certificate of Need Application Submission, Ultra Care of Georgia, Inc.**

Dear Ms. Davis:

Please find enclosed a copy of the Certificate of Need Application to be filed on May 30, 2023 by Ultra Care of Georgia, Inc. to expand its existing home health agency in State Service Delivery Region-8 with its home office in Columbus. State regulations require us to deliver a copy of this application to you.

Sincerely Yours,

/s/ Elliott L. Coward

Elliott L. Coward
Attorney for Ultra Care

Enclosures

15874052 v2

Section 1: General Identifying Information

1. Enter the following information for the person or entity that will offer or develop the new institutional health service. If applicable, this information should correspond with the information submitted to the Department's Healthcare Facility Regulation Division as the "Name of the Governing Body." The contact person should be a person directly affiliated with the Applicant and not a consultant or attorney.

APPLICANT		
Applicant Legal Name: Ultra Care of Georgia, Inc.		
d/b/a (if applicable): n/a		
Address: 5820 Veterans Pkwy, Suite 109		
City: Columbus	State: GA	Zip: 31904
County: Muscogee	Main Business Phone: (706) 324-7792	
Parent Organization: UltraCare of Georgia, Inc.		
CONTACT PERSON		
Name: Glenn Page		Title or Position: CEO
Phone: (706) 324-7763	Fax: (706) 324-7792	
E-mail Address: gpage@ultrahomehealth.com		

2. Is the name of the facility or proposed facility different than the Applicant's legal name? YES NO

If YES → Enter the facility information below. If applicable, this information should correspond to the "Name of Facility" maintained by the Department's Healthcare Facility Regulation Division.

If NO → Continue to the next question.

FACILITY		
Facility Name:		
Facility Address:		
City:	State:	Zip:
County:	Phone:	

3. If the facility is currently existing, is it currently licensed or permitted by the Department's Healthcare Facility Regulation Division?

YES NO Not Applicable

If YES → Attach a copy of any and all licenses and permits at **APPENDIX B**.

If NO → Continue to the next question.

If Not Applicable → Check one of the following: Not Currently Existing (Proposed Only)
 No License or Permit Required

Project Description--Question 18

The Proposed Project

The applicant proposes to expand its existing home health agency ("HHA") to serve twelve (12) counties in SSCR 8. This CON application is being filed in response to a calculated net need for additional home health services in the area. On March 31, 2023, the Department of Community Health ("DCH") published its 2025 Home Health Services Need Projections. The methodology showed a net need for 600 additional home health patients in SSCR 8, with specific unmet need in 14 counties in the area. Ultra Care proposes to serve up to 100% of the unmet need in 12 of the SSCR 8 counties. Specifically, Ultra Care proposes to serve:

- | | |
|-----------------|----------------|
| ▪ Randolph (66) | ▪ Marion (122) |
| ▪ Clay (56) | ▪ Quitman (65) |
| ▪ Dooly (83) | ▪ Schley (98) |
| ▪ Macon (187) | ▪ Stewart (67) |
| ▪ Sumter (382) | ▪ Taylor (114) |
| ▪ Talbot (49) | ▪ Webster (17) |

The Applicant

The applicant, Ultra Care of Georgia, Inc. is a locally owned home health agency that has been providing post acute services since 2002. Ultra Care is a family-oriented, full-service home health care agency providing quality care to individuals in central Georgia. The medical professionals at Ultra Care specialize in delivering compassionate care, along with a personalized solution to meet the needs of patients within the relaxing, comfortable environment of their homes. Ultra Care provides services in the following disciplines:

- Skilled Nursing
- Home Health Aides
- Physical, Occupational, & Speech Therapy
- Infusion Therapy
- IV Therapy
- Medical Nutrition Therapy
- Wound Care
- Patient & Family Support through Medical Social Workers
- Patient & Caregiver Education

Ultra Care is qualified to meet the needs of the proposed service area. Ultra Care has been based in Muscogee County since its inception, and uniquely understands the region and its residents. Now, Ultra Care seeks to apply its knowledge and expertise in home health care services to remaining residents of SSCR 8. The home health agency is an expansion of an existing agency and requires minimal expansion costs of approximately \$20,000 (not including the cost to prepare the CON).

Range of Services

Ultra Care will operate alongside the existing continuum of care in SSDR 8 by providing medical or personal care services in the patient's home via licensed or certified personnel. Patients requiring home health services have a wide variety of care needs and capabilities, and its expertise and experience in offering such services allows Ultra Care to efficiently and skillfully meet those needs. Ultra Care will offer skilled nursing care, home health aides, medical social work, and a variety of therapies, including physical therapy, speech therapy, and occupational therapy.


Section 3: General Review Considerations

All Certificate of Need applications are evaluated to determine their compliance with the general review considerations contained in Rule 111-2-2-.09. Please document how the proposed project conforms with the following general review considerations.

Rule 111-2-2-.09(1)(a): Consistency with State Health Plan

The proposed new institutional health service is reasonably consistent with the relevant general goals and objectives of the State Health Plan.

19. Explain how the project is consistent with the State Health Plan or why it does not apply. Also explain how the application is consistent with the Applicant's own long range plans.

 **NOTE:** *If your explanation exceeds this blocked space, attach additional 8-½ by 11-inch pages, number the first sheet Page 10.1, the second Page 10.2 and so on. Do not alter the main page numbers of this application. Once printed, insert your additional pages 10.1, etc. behind this Page 10.*

Please see the attached discussion of the project's consistency with the State Health Plan beginning at p. 10.1.

Consistency with the State Health Plan – Question 19

Ultra Care's proposed expansion of its HHA to serve SSDR 8 counties with calculated unmet need is consistent with the goals and objectives described in the Home Health Services Component Plan. The goal of the State Health Plan is:

To ensure that Georgia citizens have access to cost-effective, efficient, and quality home health services.

This general goal is achieved through a series of six objectives that aim to increase access to home health services for Georgians. The proposed project will undoubtedly increase access to cost-effective, efficient, high quality home health services for residents of SSDR 8. The following narrative provides detail supporting Ultra Care's compliance with the State Health Plan.

Objective 1: Improve access to cost-effective, quality home health services by authorizing these services based on a demand-based numerical need methodology.

DCH's Home Health Services Need Projections for Horizon Year 2025 were published on March 31, 2023. Application of the numerical need methodology in Rule 111-2-2-.32(3)(a) identified an overall unmet need of 600 patients in SSDR 8. **Figure 1** shows the calculated need by county for SSDR 8.

Figure 1

2025 Home Health Services Need Projections, SSDR 8 Counties

8	Chattahoochee	10,899	84	55	0.5%	55	(29)	0	(29)
8	Clay	2,771	73	17	(0.8%)	17	(56)	0	(56)
8	Cnsp	21,877	433	487	(0.4%)	485	52	0	52
8	Dooly	12,852	269	187	(0.9%)	185	(83)	0	(83)
8	Harris	36,020	705	491	0.7%	495	211	0	(211)
8	Macon	12,585	242	55	(0.7%)	55	(187)	0	(187)
8	Marion	8,130	182	60	(0.4%)	60	(122)	0	(122)
8	Muscogee	185,566	2,933	3,853	(0.7%)	3,827	895	0	895
8	Quitman	2,254	65	1	(0.3%)	1	(65)	0	(65)
8	Randolph	6,547	161	96	(0.8%)	95	(66)	0	(66)
8	Schley	5,354	98	0	0.1%	0	(98)	0	(98)
8	Stewart	5,945	106	39	(0.7%)	39	(67)	0	(67)
8	Sumter	28,619	525	144	(0.6%)	143	(382)	0	(382)
8	Talbot	5,858	152	104	(1.1%)	103	(49)	0	(49)
8	Taylor	7,773	162	48	(0.5%)	48	(114)	0	(114)
8	Webster	2,384	56	40	(1.5%)	39	(17)	0	(17)
SSDR 08 TOTAL		355,434	6,247	5,677		5,647	(600)	0	(600)

Source: DCH Home Health Agency Services Need Projection Summary, 03/31/2023.

Ultra Care proposes to expand its HHA to serve twelve of the SSDR 8 counties that show a net projected unmet need in the horizon year, which include:

- Randolph (66)
- Clay (56)
- Dooly (83)
- Marion (122)
- Quitman (65)
- Schley (98)

- Macon (187)
- Sumter (382)
- Talbot (49)
- Stewart (67)
- Taylor (114)
- Webster (17)

The net projected unmet need in these counties is 1,306 patients by 2025. Ultra Care is uniquely qualified to meet the large unmet need in the proposed service area. As discussed, Ultra Care, as a company, is home grown in the SDDR and has a unique understanding of the residents of the area.

The twelve SDDR 8 counties that Ultra Care proposes to serve currently have several providers of home health services. **Figure 2** shows details of the existing inventory of home health providers that are currently authorized to provide services in the counties that Ultra Care proposes to serve.

Figure 2

Existing Inventory of Home Health Agencies Serving the Proposed Service Area		
Agency Name	UID	Authorized Counties with Unmet Need
Amedisys Home Health of Macon	HHA075	Sumter
Amicita Home Health	HHA117	Clay, Randolph
CareSouth - An Affiliate of Crisp Regional	HHA052	Dooly, Macon, Sumter
Encompass Health Home Health	HHA053	Marion, Stewart, Talbot, Taylor, Webster
Kindred at Home - Columbus	HHA019	Marion, Talbot
Phoebe Home Health	HHA051	Clay, Quitman, Randolph, Stewart, Sumter, Webster

The project will expand an existing HHA to meet a DCH-defined unmet need per DCH's demand-based need methodology. Ultra Care has the knowledge and expertise to meet this need in light of its established record for high-quality home health care and can do so in a cost-effective manner.

Objective 2. Ensure quality and patient safety through compliance with appropriate standards and Guidelines.

Ultra Care will continuously ensure quality and patient safety by implementing and upholding rigorous compliance standards that exceed industry standards and guidelines. Ultra Care and its leadership will utilize the knowledge and expertise gained from operating and serving home health patients to implement robust education and safety, risk management, and quality improvement policies and procedures, which will ensure staff and patient safety compliance and high-quality care.

Ultra Care has an existing performance improvement program and intends to implement a more robust Quality Improvement program as well to reflect its future growth. The QAPI Program will be developed, implemented, regularly reviewed, and updated regularly.

The goals of the QAPI Program are:

To collect and analyze data to improve identified processes, patient safety and outcomes within the Agency.

- To educate and involve appropriate staff (including skilled staff) in Quality Assessment and Performance Improvement (QAPI) activities.
- To collect and analyze data to improve identified processes of patient care/services as well as outcomes of patient care, leadership and managerial processes, as indicated. To establish mechanisms to reprioritize QAPI activities in response to unusual and/or urgent events.
- To allocate adequate resources for QAPI.
- To create and maintain information systems (manual and/or computer) to support the collecting, managing and analyzing of data needed to facilitate ongoing QAPI.
- To endeavor to meet the needs/expectations of our internal and external customers and suppliers including: staff, patients, families, caregivers, physicians, referral sources, third party providers, community agencies, federal and state agencies and accrediting organizations.
- To apply principles and tools of QAPI to all aspects of the organization.

The QAPI Program will be established by senior management of the organization in collaboration with interdisciplinary staff members with the governing body holding ultimate responsibility. Staff at all levels of the agency participate in the QAPI process. Appropriate data is gathered continuously and analyzed at least quarterly with recommendations implemented to improve the quality of patient care services, organizational performance, and to improve patient, physician, and customer satisfaction.

The QAPI program includes processes for measuring, analyzing, and tracking quality indicators, including adverse patient events, and other aspects of performance that enable the home health to assess processes of care, services and operations in the following domains:

- Environment of care
- Emergency management
- Equipment Management
- Human Resources
- Infection Prevention and Control
- Information management
- Leadership
- Medication Management
- Provision of care, treatment and services
- Record of care, treatment, and services
- Rights and responsibilities
- Waived testing

The proposed home health agency will collect data that will be used to monitor the effectiveness and safety of services and quality of care and identify opportunities for improvement. Program data includes, but is not limited to:

- Measures derived from OASIS data (when applicable).
- Adverse event reports.
- Home visits.

- Patient medical records.
- Patient/caregiver interviews.
- Staff interviews.
- Policies/procedures.
- Incident reports.
- Medication profiles.
- On-call logs.
- Supervisory visit observation.
- Peer review.
- Patient perception of care surveys.
- Recommendations from federal, state and accreditation surveys and other regulatory agencies.

Statistical techniques will be utilized, as appropriate, to compile and analyze data. Such statistical techniques include: control charts, histograms, bar graphs and Pareto charts. Such techniques help to focus the Agency's attention and resources on those processes and outcomes for which more intensive analysis will be most beneficial.

The QAPI Committee is responsible for taking appropriate action. Aggregate measures of performance for each process will be compared to pre-established performance expectations to determine if additional evaluation is required. If the performance expectation is not met, the findings will be evaluated by the QAPI Committee to determine the systematic approach for making improvement. A summary of data collection, analysis, recommendations for improvement and report of cumulative findings will be prepared by the QAPI Committee. The reports are forwarded to the Governing Body. Failure to achieve expected levels of performance will be documented and an explanation delineated to identify opportunities for improvement.

The home health performance improvement program is evaluated for effectiveness at least annually and revised as necessary to assure appropriateness of the approach to planning processes of improvement, setting priorities for improvement, assessing performance systematically, using statistically valid methods, implementing improvement activities on the basis of assessment, and improvement outcomes.

Objective 3. Assess availability, quality and effectiveness of services being provided through information and statistical data.

Ultra Care maintains internal monitoring and control systems designed to collect, organize, and provide periodic information and data to evaluate how effective the services are relative to patient needs. There are a number of data sources and statistical tools that Ultra Care utilizes to assess the availability, quality and effectiveness of services being provided.

Ultra Care clinical managers will monitor patient outcome data continuously to assess and measure the effectiveness of treatment interventions. Ultra Care will also review and assess quality and effectiveness data available on the annual Medicare PEPPER report, quarterly IQIES Agency Patient Related Characteristics report as well as Home Health Compare data.

Ultra Care will also use the Consumer Assessment of Healthcare Providers and Systems Home Health Care Survey ("HCAHPS"), which is designed to measure the experiences of people

receiving home health care from Medicare-certified home health agencies. The HHCAHPS is conducted for home health agencies by approved HHCAHPS Survey vendors.

HHCAHPS is a 34-item questionnaire and data collection methodology to measure patients' perceptions of their skilled home care. The survey can be completed by the patient, or the patient may have a proxy answer the questionnaire with their responses by the three survey modes of mail only, telephone only, and mixed mode. There are 25 "core questions" and 9 "about you" questions on HHCAHPS. Questions cover topics such as: communication about care, pain, and prescription medication use, the care received from the home health agency, staying informed about scheduling, and global ratings. According to CMS, the survey is designed to meet the following three broad goals:

1. To produce comparable data on the patient's perspective that allows objective and meaningful comparisons between home health agencies on domains that are important to consumers.
2. Public reporting of survey results will create incentives for agencies to improve their quality of care.
3. Public reporting will enhance public accountability in health care by increasing the transparency of the quality of care provided in return for public investment.

The national implementation of the HHCAHPS Survey began in October 2009 with agencies participating on a voluntary basis until quality reporting requirements for the home health annual payment update (APU) began in the third quarter of calendar year 2010. The Centers for Medicare & Medicaid Services (CMS) began publicly reporting results from the HHCAHPS Survey on Home Health Compare on the Medicare.gov website in April of 2012. The HHCAHPS is a valuable tool because it allows home health agencies to benchmark themselves against other providers, as well as state and national averages. Because the data is publicly available through the Medicare.gov website, consumers (patients/family members, etc.) are able to compare agencies and trust that high scores on the HHCAHPS indicate a quality home health program.

Objective 4. Encourage continuity of Home Health Services.

Ultra Care works with community referral resource organizations that typically interact with HHAs, such as hospitals, physicians, and other care providers, and will develop similar relationships among providers and agencies who serve residents of SSDR 8 in the expansion counties. Ultra Care has a community linkage plan (see Appendix N) and personnel with extensive professional experience with creating continuity of care relationships and referral arrangements with local hospitals, physicians, nursing homes, hospices, and other home health service providers.

Ultra Care maintains routine working relationships with resources and hospitals in and around the Columbus area, and as it moves into new communities, it will work with select local governmental public health, transportation, social and welfare assistance agencies that commonly assist senior citizens, persons with disabilities, dual eligible Medicare and Medicaid recipients receiving public and private assistance, such as Meals on Wheels, disability transportation services, medical appointment transport, financial and housing-related assistance, participation in senior center activities, and mental health services.

Ultra Care intake staff, social services, and nursing staff will assess each patient's nursing, therapy, and welfare status as part of the treatment planning and implementation process. This ensures that each patient's plan of care is inclusive of outside services, including mental health, social, and welfare services.

Objective 5. Improve access to Home Health Services by encouraging the provision of services on a nondiscriminatory basis.

Ultra Care provides services to all patients on a non-discriminatory basis, without regard to race, color, national origin, sex (including gender, gender expression, pregnancy, or sexual orientation), age, or disability.

Ultra Care fully complies with federal Medicare participation regulations, including maintaining non-discrimination policies and procedures (see Appendix J). All staff and leadership are and will be trained on these policies and procedures at the time of hiring and at least annually thereafter.

Objective 6. Improve financial access to Home Health Services by encouraging the provision of services to indigent and charity care patients and participation in public reimbursement programs.

Ultra Care is dedicated to making quality home health services available to the residents of SSDR 8 and ensuring that these individuals can receive affordable and accessible care in their homes. As such, Ultra Care commits to providing **1.5% of its annual adjusted gross revenue as uncompensated indigent and charity care**. Ultra Care will implement this via its indigent and charity care policy (see **Appendix J**). Staff members will be trained to assist home health patients apply for Medicare and Medicaid if the patient has no healthcare coverage and appears to qualify for public healthcare programs.