



**Holly S. Hosford**

hhosford@bradley.com

205.521.8376

November 6, 2020

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: Affinity Healthcare Services, Inc. d/b/a Affinity Home Hospice Services  
SHPDA ID 073-P2323  
Request for Reviewability Determination to Establish Branch Office in Pell City (St.  
Clair County)

Dear Ms. Marsal:

I am writing on behalf of Affinity Healthcare Services, Inc. d/b/a Affinity Home Hospice Services (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 establish a hospice branch office in Pell City, St. Clair County, which is located within the service area the Agency is permitted to serve pursuant to CON 2323-HPC. In order to assist with this determination, we offer the following information:

1. Pursuant to CON 2323-HPC, the Agency has CON authority to provide in-home hospice services in the following counties: Jefferson, St. Clair, Blount, Shelby, Bill, Talladega, Chilton and Walker.
2. The Agency seeks approval to establish a branch office in Pell City, St. Clair County. The branch office will operate under the Agency's Medicare Provider Number, 01-1624.
3. No services will be provided at the branch office because the services will be provided in the patients' homes.
4. The branch office will only serve patients in the counties the Agency is authorized to serve under CON 2323-HPC.
5. This request does not seek to alter the services provided by the Agency or to alter the Agency's authorized CON service area.
6. The establishment of the branch office does not involve the construction, development, acquisition, or other establishment of a new health care facility and does not involve any capital expenditures in excess of the threshold amounts set forth in CON Rule § 410-1-4-.01 (\$3,079,347 for major medical equipment, \$1,231,738 for new annual operating costs, and \$6,158,695 for other capital expenditures).

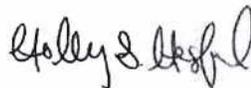
Affinity Healthcare Services, Inc. d/b/a Affinity Home Hospice Services  
Request for Reviewability Determination  
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7. The establishment of the branch office does not involve the addition, relocation, or reallocation of beds and does not entail the acquisition of major medical equipment.
8. The establishment of the branch office does not involve the offering of a new health care service, as the Agency currently provides in-home hospice services to patients in St. Clair County, as authorized by CON 2323-HPC.
9. The establishment of the branch office does not involve a new institutional health service subject to review under Ala. Code § 22-21-263 and/or CON Rule § 410-1-4-.01.

Based upon the above, we respectfully request your determination that Affinity Healthcare Services, Inc. d/b/a Affinity Home Hospice Services is not required to obtain a CON in order to establish a branch office in St. Clair County. We appreciate your consideration of this request and welcome the opportunity to address any questions regarding this matter. The applicable filing fee will be delivered to the Agency via Fed Ex. Thank you very much.

Best regards,



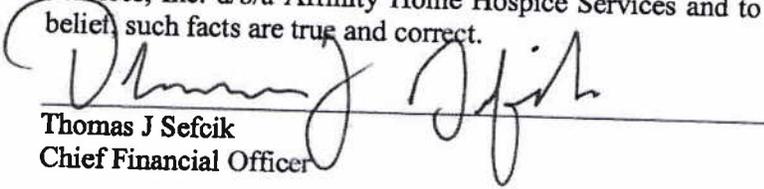
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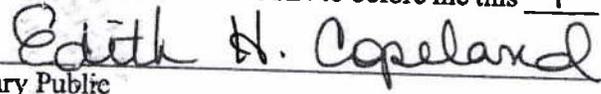
**Affirmation of Requesting Party:**

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

  
\_\_\_\_\_  
Thomas J Sefcik  
Chief Financial Officer

(SEAL)

SUBSCRIBED AND SWORN to before me this 9<sup>th</sup> day of November, 2020.

  
\_\_\_\_\_  
Notary Public

My commission expires: Edith H. Copeland  
Notary Public, Alabama State At Large  
My Commission Expires August 15th, 2024

**Holly S. Hosford**  
hhosford@bradley.com  
205.521.8376

**Bradley** RV2021-004

RECEIVED

Nov 16 2020

STATE HEALTH PLANNING AND  
DEVELOPMENT AGENCY

November 16, 2020

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: RV 2021-004  
Affinity Acquisitions, LLC d/b/a Affinity Home Hospice Services  
SHPDA ID 073-P2323

Dear Ms. Marsal:

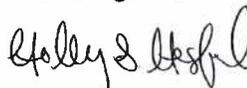
On behalf of Affinity Acquisitions, LLC d/b/a Affinity Home Hospice Services (the "Agency"), I write to respond to your letter dated November 10, 2020. In your letter, you request a disclosure of financial interests in the entity requesting the reviewability determination held by any other healthcare facilities or groups.

The entity requesting the reviewability determination, the Agency, is a wholly owned subsidiary of Affinity Hospice Holdings, LLC, which is owned by MBF Healthcare Partners II, L.P. and Ray Shrout. No other healthcare facilities or groups have any ownership interest in Agency.

In addition, enclosed please find a corrected Request for Reviewability Determination, which was amended to correct a scrivener's error.

Please do not hesitate to contact me if you have any further questions or need any additional information.

Best regards,



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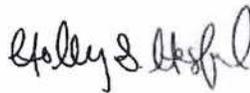
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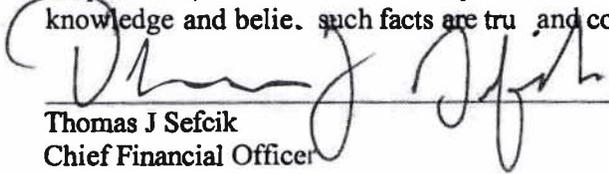


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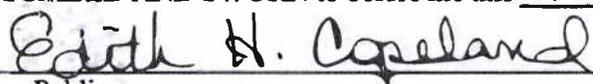
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Thomas J Sefcik  
Chief Financial Officer

(SEAL)

SUBSCRIBED AND SWORN to before me this 9<sup>th</sup> day of November, 2020.

  
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Notary Public

My commission expires: Edith H. Copeland  
Notary Public, Alabama State At Large  
My Commission Expires August 15th, 2024