



April 19, 2023

**VIA EMAIL TO: [shpda.online@shpda.alabama.gov](mailto:shpda.online@shpda.alabama.gov)**

Alabama State Health Planning and Development Agency  
100 North Union Street, Suite 870  
Montgomery, AL 36104

**Re: Request for Letter of Non-Reviewability  
Aveanna Hospice of Monroeville – SHPDA ID 099-P2444  
Aveanna Hospice of Andalusia – SHPDA ID 039-P2332**

To Whom It May Concern:

Comfort Care Hospice, LLC (“Comfort Care”) requests a Letter of Non-Reviewability regarding its proposed plan to consolidate the certificates of need (“CON”) for two of the hospice agencies it owns and operates in Alabama. Specifically, Comfort Care seeks to consolidate the CON associated with its Monroeville location (doing business as Aveanna Hospice of Monroeville) into the CON for its Andalusia location (doing business as Aveanna Hospice of Andalusia) as set forth below.

Aveanna Hospice of Monroeville (SHPDA ID 099-P2444, CON 2333-HPC and CON 2444-HPC) is currently authorized to provide services in Baldwin, Clarke, Conecuh, Escambia, Mobile, Monroe, and Washington Counties.

Aveanna Hospice of Andalusia (SHPDA ID 039-P2332, CON 2332-HPC) is currently authorized to provide services in Coffee, Covington, and Geneva Counties.

Following the proposed consolidation, the new service area of Aveanna Hospice of Andalusia will consist of Baldwin, Clarke, Coffee, Conecuh, Covington, Escambia, Geneva, Mobile, Monroe, and Washington Counties and the counties will be served under Medicare No. 01-1597. Aveanna Hospice of Monroeville will no longer operate as a separate location. Importantly, this request is to consolidate the CONs into one parent agency, and it does not involve a request to change the service areas currently authorized by the issued CONs. This consolidation will enable Comfort Care to achieve greater administrative efficiencies and provide better oversight and care to patients in this area of Alabama. Comfort Care will not incur additional costs due to this consolidation.

Pursuant to Alabama State Health Planning and Development Agency rules, we have submitted payment electronically for the \$1,000 filing fee associated with this request. Thank you for your attention to this matter. Should you have any questions or need any additional information, please feel free to contact me at 952-358-3278 or [Kate.Speer@aveanna.com](mailto:Kate.Speer@aveanna.com).

Best Regards,

*Kate Speer*

Kate Speer  
AVP, Regulatory Licensing & Corporate Counsel



RV2023-018

RECEIVED

May 04 2023

STATE HEALTH PLANNING AND  
DEVELOPMENT AGENCY

May 4, 2023

**VIA EMAIL TO: [shpda.online@shpda.alabama.gov](mailto:shpda.online@shpda.alabama.gov)**

Alabama State Health Planning and Development Agency  
100 North Union Street, Suite 870  
Montgomery, AL 36104

**Re: RV2023-018  
Updated Request for Letter of Non-Reviewability  
Aveanna Hospice of Monroeville – SHPDA ID 099-P2444  
Aveanna Hospice of Andalusia – SHPDA ID 039-P2332**

To Whom It May Concern:

Comfort Care Hospice, LLC (“Comfort Care”) provides this updated letter requesting a Letter of Non-Reviewability regarding its proposed plan to consolidate the certificates of need (“CON”) for two of the hospice agencies it owns and operates in Alabama. Specifically, Comfort Care seeks to consolidate the CON associated with its Monroeville location (doing business as Aveanna Hospice of Monroeville) into the CON for its Andalusia location (doing business as Aveanna Hospice of Andalusia) as set forth below.

Aveanna Hospice of Monroeville (SHPDA ID 099-P2444, CON 2333-HPC and CON 2444-HPC) is currently authorized to provide services in Baldwin, Clarke, Conecuh, Escambia, Mobile, Monroe, and Washington Counties.

Aveanna Hospice of Andalusia (SHPDA ID 039-P2332, CON 2332-HPC) is currently authorized to provide services in Coffee, Covington, and Geneva Counties.

Following the proposed consolidation, the new service area of Aveanna Hospice of Andalusia will consist of Baldwin, Clarke, Coffee, Conecuh, Covington, Escambia, Geneva, Mobile, Monroe, and Washington Counties and the counties will be served under Medicare No. 01-1597. Aveanna Hospice of Monroeville will no longer operate as a separate location. Importantly, this request is to consolidate the CONs into one parent agency, and it does not involve a request to change the service areas currently authorized by the issued CONs. This consolidation will enable Comfort

Care to achieve greater administrative efficiencies and provide better oversight and care to patients in this area of Alabama. Comfort Care will not incur additional costs due to this consolidation.

In response to your request for additional information, an organizational chart is attached to this updated letter and the notarized Affirmation of Requesting Party is below. The proposed consolidation will include no new or additional services.

Pursuant to Alabama State Health Planning and Development Agency rules, we have submitted payment electronically for the \$1,000 filing fee associated with this request. Thank you for your attention to this matter. Should you have any questions or need any additional information, please feel free to contact me at 952-358-3278 or [Kate.Speer@aveanna.com](mailto:Kate.Speer@aveanna.com).

Best Regards,

*Kate Speer*

Kate Speer  
AVP, Regulatory Licensing & Corporate Counsel

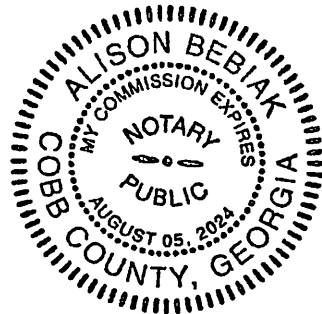
The undersigned, being first duly sworn, hereby affirms that, he is the Chief Legal Officer and Corporate Secretary of Comfort Care Hospice, LLC, has knowledge of the facts in this request, and to the best of his information, knowledge, and belief, such facts are true and correct.

Affiant *Shannon L. Drake*  
Shannon L. Drake

Subscribed and Sworn to before me this 3<sup>rd</sup> day of May, 2023.

*Alison Bebiak*  
Notary Public

My commission expires 8/5/24



**Organizational Chart for Comfort Care Hospice, L.L.C.**

