

**STATE AGENCY ACTION REPORT
ON APPLICATIONS FOR CERTIFICATE OF NEED**

A. PROJECT IDENTIFICATION

1. Applicant/CON Action Number

PruittHealth-Hillsborough County, LLC/CON #10509

1626 Jeurgens Court
Norcross, Georgia 30093

Authorized Representative: Neil L. Pruitt, Jr.
Chairman and CEO
(678) 533-6699

**Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health
Care Center/CON #10510**

709 S. Harbor City Blvd., Suite 240
Melbourne, Florida 32901

Authorized Representative: Geoff Fraser
Senior Vice-President
(321) 288 - 0171

2. Service District/Subdistrict

District 6/Subdistrict 6-1 (Hillsborough County)

B. PUBLIC HEARING

A public hearing was not held or requested regarding either of the proposed projects.

Letters of Support

PruittHealth-Hillsborough County, LLC (CON application #10509):

The applicant includes letters of support in Tab 4 of CON application #10509. Letters of support are submitted from local health providers across a spectrum of health services ranging from hospitals, home health agencies and assisted living facilities. The letters discuss support of the proposal in light of insufficient private rooms to accommodate patients

CON Action Numbers: 10509 and 10510

with high-acuity, bariatric, complex, isolation, significant equipment needs or Medicaid patients. The letters of support also identify PruittHealth as a provider with a historical record of providing long-term care within the health industry, for this reason the proposal is seen as a beneficial addition to the service area. The letters assert that introduction of a new provider is also anticipated to increase competition to improve quality, access and cost-effectiveness.

Letters of support are noted from:

- Shelly Brandt, Director Case Management, Florida Hospital Tampa
- Rachel Scarfone, Manager, Case Management, Florida Hospital Wesley Chapel
- Debi Martoccio, Chief Executive Officer, Florida Hospital at Connerton
- Douglas A. Holt, MD, Director, Florida Department of Health – Hillsborough County
- David Queener, Executive Director, Hudson Manor Assisted Living
- Tina Stepp, Administrator, Brookdale Home Health
- Lee Buderus, Administrator, Right at Home
- Rob Loomis, Vice President, A Country Place Assisted Living Facility
- Alexandra Santamaria, Administrator, Southeast Homecare
- Matthew Thomas, Owner/Administrator, Comfort Keepers Home Care - Tampa

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510): In Appendix F of CON application #10510, letters of support are included from local health professionals, community health organizations and facilities, educational institutions, patients and community members. Support letters express favorable reviews of Sun Terrace Health Care Center as a provider, the capacity for the applicant to invest resources into specialized areas and needs of high-acuity patients in the community, the need/benefits of a proposed facility expansion, improved patient/quality outcomes of care through the facility, the special equipment capacity for aging/injured patients and increases in population within the region especially among senior citizens. Form letters are present among the letters of support.

Letters are noted from:

- Debbie Caneen, President, South Shore Coalition for Mental Health and Aging
- Robert G. Black, Acting Chair, Sun City Center Adult Care Center
- Marcia Doschier, Clinical Supervisor, Counseling and Human Services Program, Hillsborough Community College, Tampa, Florida

C. PROJECT SUMMARY

PruittHealth-Hillsborough County, LLC (CON application #10509) is a newly formed entity which will be referred to as PHH or the applicant. PHH proposes to establish a new 105-bed community nursing home or a partial award for 84 beds. The proposal is anticipated to fulfill a gap in services for Medicaid long-term care enrollees in addition to enhancing the availability and accessibility of long-term care beds in Hillsborough County. The applicant is an affiliate of PruittHealth, an existing skilled nursing facility (SNF) provider in Santa Rosa County, Florida which currently operates PruittHealth-Santa Rosa, a community nursing home of 120 beds.

For the 105-bed proposal, the proposed project includes 79,587 gross square feet (GSF) of construction which consists solely of new construction. The construction cost is \$13,131,855. The total project cost is \$22,975,320. The total project cost includes land, building, equipment, project development, financing and start-up costs.

For the 84-bed partial proposal (CON application #10509P), the proposed project includes 70,184 GSF of construction which also only consists of new construction. The construction cost is \$11,580,360. The total project cost is \$21,104,618. The total project cost includes land, building, equipment, project development, financing and start-up costs.

The applicant expects issuance of licensure in November 2020 and initiation of service in January 2021 for both proposals (CON application #10509, Schedule 10).

PHH includes the following conditions in Schedule C:

- Location:
 - Hillsborough County, Subdistrict 6-1, Florida
- Programming/Operational Conditions:
 - Seek Joint Commission accreditation or accreditation from some other similarly recognized accrediting body
 - Implement a program designed to reduce hospital re-admissions; the current program utilized by PruittHealth affiliated facilities is INTERACT 3.0. The program to be implemented will be this program or other similarly designed program based on the most recent quality driven program PruittHealth determines to be available at the time of implementation.
 - Include two bariatric rooms in the facility design

CON Action Numbers: 10509 and 10510

- Participate in an organization-wide Quality Assurance/ Performance Improvement initiative that entails quarterly visits in regard to clinical, operational, pharmaceutical and reimbursement areas by corporate consultants to ensure compliance with all local, state and federal laws
- Implement Electronic Medical Records (EMR) at the facility, and include Smart Charting or other similar bed side patient charting tool
- Implement Resident Safety Technology including Call Guard and WanderGuard into the facility
- Implement Clinical Kiosks in appropriate locations throughout the facility
- Assure all staff maintains ongoing training and continuing education credits utilizing Pruitt University and at no cost to the employees
- Participate in a company-wide Annual Quality Report to demonstrate transparency in operations and make this Quality Report available to the public
- Adopt the PruittHealth patient model of care including the applicable PerfectPath Programs appropriate for this facility and described in the CON application and Supporting Documents
- Implement PointRight Technology (or a future similar technology) in the ongoing operations

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510) also referenced as STHCC or the applicant is an existing provider operated by Clear Choice Health Care (CCHC) proposing to add 21 beds to its existing campus in Subdistrict 6-1, Hillsborough County. STHCC is an existing SNF with 109 community nursing home beds. The proposed project is expected to benefit the existing facility by allowing the applicant to continue to provide specialized high-intensity rehabilitative services. The proposal is also expected to benefit residents of Sun Towers Retirement Community (a 286-bed assisted living facility and independent living facility) who have need for long- or short-term skilled nursing care, which is also operated by Sun City Center Associates. STHCC expects for the addition of the 21 licensed beds in this proposal to serve as a reinstatement for previously delicensed sheltered beds at Sun Towers Retirement community. The applicant indicates that the existing campus is also undergoing renovations to convert 21 shared private rooms to private rooms, renovations to the facility are also stated to involve expansions for additional services. The bed addition proposed in CON application #10510, in addition to expansions and other renovations, is expected to result in minimal disruption to residents in the existing facility. STHCC

CON Action Numbers: 10509 and 10510

maintains that the proposed project will address an identified need for high-intensity rehabilitative services and equipment in Hillsborough County.

Clear Choice Health Care currently operates eight SNFs in the State of Florida. These facilities are listed below:

- Belleair Health Care Center, Subdistrict 5-2 (Pinellas) 120 beds
- Centre Pointe Health and Rehab Center, Subdistrict 2-4 (Leon), 120 beds
- Conway Lakes Health and Rehab Center, Subdistrict 7-2 (Orange) 120 beds
- East Bay Rehabilitation Center, Subdistrict 5-2 (Pinellas) 120 beds
- Melbourne Terrace Rehabilitation Center, Subdistrict 7-1 (Brevard) 129 beds
- Port Charlotte Rehabilitation Center, Subdistrict 8-1 (Charlotte) 132 beds
- Spring Lake Rehabilitation Center, Subdistrict 6-5 (Polk) 120 beds
- Sun Terrace Health Care Center, Subdistrict 6-1 (Hillsborough) 109 beds

The proposed project includes 5,911 GSF of renovation and \$16,800 in renovation construction cost. The total project cost is \$220,000. The total project cost includes land, building, equipment and project development costs.

The applicant expects issuance of licensure and initiation of service in December 2018.

Sun City Center Associates includes the following conditions in Schedule C:

The applicant will provide an array of unique high-intensity sub-acute rehabilitative programs and services for residents in its nursing home, including the following:

- Lee Silverman Voice Treatment (LSVT) Loud Program
- Lee Silverman Voice Treatment (LSVT) BIG Program
- Infusion therapy services including:
 - Peritoneal Dialysis
 - Total Peritoneal Nutrition
- Aquatic therapy, through development of two hydrotherapy pools
- Rehabilitative therapy for patients unable to perform 100 percent weight-bearing ambulation, through purchase and use of an anti-gravity treadmill

CON Action Numbers: 10509 and 10510

- Rehabilitative therapy for patients who would benefit from compressed-air equipment designed specifically for the aging population, through purchase and use of HUR Equipment and/or specialized equipment
- Sunshine/Wellness Check Program
- Home Assessments:
 - A medication reconciliation
 - Rehabilitation Therapy Team Assessment, as appropriate
- Transportation Program to transport outpatients from their home environment to therapy sessions when medically necessary. This same transportation program will be utilized for long-term residents' family members without the means to travel to see his/her loved one in the nursing home, as needed

The applicant will ensure highly skilled clinic staff members provide care to residents in its nursing home, evidenced by special training and/or certification as follows:

- Lee Silverman Voice Treatment (LSVT) Loud Certified
- Lee Silverman Voice Treatment (LSVT) BIG Certified
- Aquatic Therapy Certification
- Certified Stroke Rehabilitation Specialist (CSRS)
- Lymphedema Certification
- Vital Stim Therapy Certification
- Neurodevelopmental Treatment (NDT) Certification

Community Give-Back Programs: Annual funding at least \$150,000

The applicant commits to a total annual Community Give-Back Programs amount of at least \$150,000 comprised of the following components

- Unreimbursed indigent/charity care provided to patients requiring services at its facility
- Donations of goods, services, and/or direct funding to local charities selected by residents
- Scholarship programs, which pay the costs of staff members to enroll in academic programs to further their formal education

CON #10509 - CON #10510				
CON# /Applicant	# of Beds / Project	GSF	Cost(\$)	Cost/Bed (\$)
10509 PruittHealth - Hillsborough, LLC	105	79,587	22,975,320	218,812.57
10509P PruittHealth - Hillsborough, LLC	84	70,814	21,104,618	251,245.45
10510 Sun City Center Associates, LTD (L.P.)	21	5,911	220,000	10,476.19

Source: Schedule 9, CON application #s 10509, 10510

NOTE: Section 408.043 (4) Florida Statutes, prohibits accreditation by any private organization as a requirement for the issuance or maintenance of a certificate of need, so Joint Commission accreditation will not be cited as a condition to approval. Should any or all projects be approved, the applicant(s) proposed conditions would be reported in the annual condition compliance report as required by Rule 59C-1.013 (3) Florida Administrative Code.

D. REVIEW PROCEDURE

The evaluation process is structured by the certificate of need review criteria found in Section 408.035, Florida Statutes; and applicable rules of the State of Florida, Chapters 59C-1 and 59C-2, Florida Administrative Code. These criteria form the basis for the goals of the review process. The goals represent desirable outcomes to be attained by successful applicants who demonstrate an overall compliance with the criteria. Analysis of an applicant's capability to undertake the proposed project successfully is conducted by evaluating the responses and data provided in the application, and independent information gathered by the reviewer.

Applications are analyzed to identify strengths and weaknesses in each proposal. If more than one application is submitted for the same type of project in the same district, applications are comparatively reviewed to determine which applicant(s) best meets the review criteria.

Rule 59C-1.010(3)(b), Florida Administrative Code, prohibits any amendments once an application has been deemed complete. The burden of proof to entitlement of a certificate rests with the applicant. As such, the applicant is responsible for the representations in the application. This is attested to as part of the application in the Certification of the Applicant.

As part of the fact-finding, the consultant, Bianca Eugene analyzed the application, with consultation from the financial analyst, Butch Broussard, of the Bureau of Central Services, who evaluated the financial data and Scott Waltz of the Office of Plans and Construction, who reviewed the application for conformance with the architectural criteria.

E. CONFORMITY OF PROJECT WITH REVIEW CRITERIA

The following indicate the level of conformity of the proposed project with the criteria and application content requirements found in Florida Statutes, sections 408.035 and 408.037; applicable rules of the State of Florida, Chapter 59C-1 and 59C-2, Florida Administrative Code.

1. Fixed Need Pool

a. Does the project proposed respond to need as published by a fixed need pool? Or does the project proposed seek beds or services in excess of the fixed need pool? Rule 59C-1.008 (2), Florida Administrative Code.

In Volume 43, Number 189 of the Florida Administrative Register dated September 29, 2017, need for 105 community nursing home beds was published in the fixed need pool for Subdistrict 6-1 for the July 2020 Planning Horizon.

As of the application deadline for the October 2017 Other Beds and Programs Batching Cycle, November 15, 2017, one existing provider in Subdistrict 6-1 filed an exemption request to add 16 community nursing home beds through the conversion of 16 sheltered nursing home beds (E170028 – John Knox Village Medical Center). An expedited CON was not submitted to add community nursing home beds or establish a new community nursing home facility within the subdistrict.

Below is a table illustrating utilization in Subdistrict 6-1, Hillsborough County from July 2016 – June 2017.

CON Action Numbers: 10509 and 10510

Hillsborough County (Subdistrict 6-1) Utilization July 2016 - June 2017				
Facility	Community Beds	Bed Days	Patient Days	Utilization
Bayshore Pointe Nursing and Rehab Center	117	42,705	38,541	90.25%
Brandon Health and Rehabilitation Center	120	43,800	41,720	95.25%
Brighton Gardens of Tampa	45	16,425	12,793	77.89%
Bristol at Tampa Rehabilitation and Nursing Center	266	97,090	82,412	84.88%
Canterbury Towers, Inc.	40	14,600	3,758	25.74%
Carrollwood Care Center	120	43,800	41,975	95.83%
Central Park Healthcare and Rehabilitation Center	120	43,800	40,682	92.88%
Community Convalescent Center	120	43,800	42,633	97.34%
Consulate Health Care of Brandon	120	43,800	41,881	95.62%
Excel Care Center	120	43,800	39,700	90.64%
Fairway Oaks Center	120	43,800	42,039	95.98%
Fletcher Health and Rehabilitation Center	120	43,800	41,943	95.76%
Habana Health Care Center	150	54,750	51,800	94.61%
Hawthorne Health and Rehab of Brandon	132	48,180	40,312	83.67%
Home Association, The	96	35,040	32,193	91.88%
John Knox Village Med Center	113	41,245	37,070	89.88%
Manorcare Health Services Carrollwood	120	43,800	38,596	88.12%
NuVista Living at Hillsborough Lakes	120	43,800	30,804	70.33%
Palm Garden of Sun City	120	43,800	40,589	92.67%
Palm Garden of Tampa	120	43,800	36,374	83.05%
Plaza West	113	41,245	37,036	89.80%
Rehabilitation and Healthcare Center of Tampa	174	63,510	58,183	91.61%
Solaris Healthcare Plant City	180	65,700	64,027	97.45%
South Tampa Health and Rehabilitation Center	160	58,400	52,988	90.73%
Sun Terrace Health Care Center	109	39,785	36,384	91.45%
Tampa Lakes Health and Rehabilitation Center*	179	65,335	0	0.00%
Whispering Oaks	240	87,600	84,036	95.93%
Woodbridge Rehabilitation and Health Center	120	43,800	41,201	94.07%
Ybor City Healthcare and Rehabilitation Center	80	29,200	27,298	93.49%
Totals	3,754	1,370,210	1,178,968	86.04%

Source: Florida Nursing Home Bed Need Projections by District and Subdistrict, October 2017 Batching Cycle, * Facility has been inactive as of 2/27/15

The reviewer notes the current and projected population of Hillsborough County (Subdistrict 6-1), the district in total and Florida, for the planning horizon. The projected population growth, both numerically and by percent, is provided in the table below.

CON Action Numbers: 10509 and 10510

Hillsborough County Population Change Comparisons						
County/Area	July 1, 2017 Population			July 1, 2020 Population		
	0-64	65+	Total	0-64	65+	Total
Hillsborough	1,189,773	185,473	1,375,246	1,245,892	205,719	1,451,611
District 6	2,079,371	445,980	2,525,351	2,164,200	493,035	2,657,235
Florida	16,436,222	3,946,081	20,382,303	16,878,676	4,339,190	21,217,866
County/Area	2017 - 2020 Increase			2017 - 2020 Growth Rate		
	0-64	65+	Total	0-64	65+	Total
Hillsborough	56,119	20,246	76,365	4.72%	10.92%	5.55%
District 6	84,829	47,055	131,884	4.08%	10.55%	5.22%
Florida	442,454	393,109	835,563	2.69%	9.96%	4.10%

Source: Florida Agency for Health Care Administration Population Estimates, February 2015

The community nursing home bed ratio per 1,000 residents for the age 65+ cohort in the subdistrict are shown below.

Hillsborough County Bed: Population Ratio					
County/Area	Community Beds	2017 Pop. Aged 65+	2017 Bed: Pop. Ratio per 1,000	2020 Pop. Aged 65+	2017 Beds: Pop. Ratio per 1,000
Hillsborough	3,754	185,473	20.24	205,719	18.25
District 6	8,828	445,980	19.79	493,035	17.91
Florida	80,443	3,946,081	20.39	4,339,190	18.54

Source: Florida Agency for Health Care Administration Population Estimates, February 2015 and Florida Nursing Home Bed Need Projections by District and Subdistrict, October 2017 Batching Cycle

Each co-batched applicant states that their proposed project is being submitted in response to the Agency’s fixed need pool publication dated September 29, 2017.

PruittHealth-Hillsborough County, LLC (CON application #10509) provides a historical overview of the occupancy (86.04 percent) and proportion of Medicaid days within the subdistrict (59.6 percent) and fixed need pool indicating need for 105 beds within Hillsborough County. The applicant underscores the forecasted provision of 64.3 percent of patient days to Medicaid in its Schedule 7 by year two, which is a proportion that exceeds the existing Medicaid proportions in District 6 and the State of Florida.

The applicant states that the proposal is needed as evidenced by historical occupancy rates of existing providers, less access to nursing home beds for the Medicaid long-term care population, historical population discharges to nursing homes by service line, the growing elderly population who are the most frequent users of nursing home services and the changing dynamics in payers and the payer system. The applicant maintains that PruittHealth will use its knowledge of the market and grow burgeoning relationships with local health care providers to effectively respond to the unique needs of the market. PHH

CON Action Numbers: 10509 and 10510

expects for the program to enhance the availability, accessibility and quality of nursing home services provided to residents of the service area while reducing admissions to the area hospitals.

PruittHealth expects for the proposal to result in the following outcomes

- Improve access for persons in need of long-term care
- Improve access [to] Medicaid services
- Improve access for bariatric patients
- Improve access for persons in need of short-term rehab
- Improve access of Medicare services
- Improve access to private rooms, especially for Medicaid payers
- Provide a modern design that supports independence and choice
- Provide state-of-the-art rehabilitation programming; and
- Provide extensive clinical programming focused on reducing hospital readmissions

The applicant also anticipates that the proposal(s) should be approved for the following reasons:

- 100 percent private rooms
- Two bariatric rooms/suites
- 64 percent of patient days to Medicaid long-term care enrollees
- State of the art rehab suite, extensively equipped to include a Hydroworx therapy pool
- Programs to reduce readmissions that have already been successfully introduced in other PruittHealth facilities
- A commitment to technology, including PointRight, Smart Charting, Wanderguard, Careguard and electronic medical records

PHH provides the following forecast of forecasted utilization for the full and partial proposals.

CON Action Numbers: 10509 and 10510

PruittHealth - Hillsborough, LLC Forecasted Utilization 105-bed		
	Year 1: Ending December 31, 2021	Year 2: Ending December 31, 2022
Medicare/Medicare HMO, Skilled Patients		
Admissions	185	469
Patient Days	4,515	11,498
Average Daily Census	12.4	31.5
Medicaid, Long-term Patients		
Admissions	36	97
Patient Days	8,755	23,360
Average Daily Census	24.0	64.0
All Other Payers		
Admissions	19	26
Patient Days	1,066	1,460
Average Daily Census	2.9	4.0
Total		
Admissions	240	592
Patient Days	14,336	36,318
Occupancy Rate	37.0%	95%
Average Daily Census	39.3	99.5

Source: CON application #10509, Page 79

PruittHealth - Hillsborough, LLC Forecasted Utilization 84-bed		
	Year 1: Ending December 31, 2021	Year 2: Ending December 31, 2022
Medicare/Medicare HMO, Skilled Patients		
Admissions	153	403
Patient Days	3,704	9,855
Average Daily Census	10.2	27.0
Medicaid, Long-term Patients		
Admissions	29	76
Patient Days	6,979	18,250
Average Daily Census	19.1	50.0
All Other Payers		
Admissions	18	26
Patient Days	1,066	1,460
Average Daily Census	2.9	4.0
Total		
Admissions	200	505
Patient Days	11,749	29,565
Occupancy Rate	38.0%	96%
Average Daily Census	32.2	81.0

Source: CON application #10509, Page 80

PHH concludes that the proposal will provide service area residents with a full range of post-acute nursing facility services to meet the needs of the community as a whole. The proposal is expected to enhance the availability, accessibility and quality of nursing home services provided to residents of this service area while reducing readmissions to area hospitals according to the applicant.

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510) indicates that the proposed expansion project for the addition of 21 beds to its existing campus will address need for additional nursing home beds and simultaneously benefit the residents of the fully occupied 286-bed Sun Towers Retirement Center by ensuring residents in need of skilled nursing services receive those services in their same community without disruption in their care continuum. The applicant notes that the additional beds will include all private rooms, showers and baths. STHCC indicates that the proposal allows for the continuation of specialized high-intensity rehabilitative services. STHCC states that in addition to the bed need calculated in the fixed need pool, CCHC has identified a growing need for high-intensity rehabilitative services in SNFs such as that proposed by the applicant. The applicant states that the proposed project will meet this need while enhancing geographic access for medically complex post-acute patients and providing a local alternative for patients to remain close to home. STHCC indicates that the ability for residents to receive intensive post-acute rehabilitation services close to family support is essential to resident recovery because proximity to families allows for regular visits and participation in the resident's care plan.

In evaluation of need for the proposed project, STHCC describes how Hillsborough County accounts for nearly 55.0 percent of the AHCA District 6 total population and that from 2017 – 2020 the population of Hillsborough County is forecasted to increase by 5.6 percent. The applicant notes the nursing home occupancy of Hillsborough County and references that the July 2016 – June 2017 occupancy for this subdistrict was 86.04 percent. The applicant asserts that over 63.0 percent of nursing home providers in Hillsborough County experienced an occupancy greater than 90.0 percent.

The applicant notes the increase in population of the age 65+ population, citing that older age cohorts will experience a greater percent increase in population than the population as a whole. The applicant indicates that the population aged 65+ in Hillsborough County will increase by 10.6 percent and the 75+ population is forecasted to increase by 9.2 percent from July 2017 – July 2020.

Based on its historical record, STHCC identifies CCHC as a quality provider and notes that three of its facilities are recognized as Gold Seal facilities: Centre Pointe Health and Rehab Center, Conway Lakes Health and Rehabilitation Center and Melbourne Terrace Rehabilitation Center.

CON Action Numbers: 10509 and 10510

The applicant maintains that six of CHHC’s facilities have received a four-star or five-star CMS rating. STHCC maintains that the proposed project best meets the need identified by the Agency and most comprehensively meets the need identified by the fixed need pool for Subdistrict 6-1. The applicant identifies a growing population of high-acuity patients in need of advanced rehabilitative care and expects for the proposed expansion project to serve as the best alternative to meet the future skilled nursing needs of the residents in the area.

In Schedule 5 of CON application #10510, the applicant expects the following occupancy for the entire facility after the addition of the 21 beds for the first two years of operations:

Sun Terrace Health Care Center					
130-Bed Occupancy					
Year One Admissions	Year One Patient Days	Year One Occupancy	Year Two Admissions	Year Two Patient Days	Year Two Occupancy
974	41,843	88.2%	1,078	45,989	96.7%
21-Bed Occupancy					
Year One Admissions	Year One Patient Days	Year One Occupancy	Year Two Admissions	Year Two Patient Days	Year Two Occupancy
157	6,759	88.2%	175	7,429	96.7%

Source: CON application #10510, Schedule 5, 7. Years 1 and 2 correspond to December 31, 2019 and December 31, 2020.

- b. If no Agency policy exists, the applicant will be responsible for demonstrating need through a needs assessment methodology, which must include, at a minimum, consideration of the following topics, except where they are inconsistent with the applicable statutory or rule criteria:**

Each co-batched applicant is responding to the Agency’s published fixed need pool, so this criterion is not applicable.

2. Agency Rule Preferences

Please indicate how each applicable preference for the type of service proposed is met. Chapter 59C-1.036, Florida Administrative Code.

Chapter 59C-1.036 of the Florida Administrative Code does not contain preferences relative to community nursing home beds nor does the Agency publish specific preferences for these facilities. However, the rule does contain standards the Agency utilizes in assessing an applicant’s ability to provide quality care to the residents.

- a. **Geographically Underserved Areas.** In a competitive certificate of need review within the nursing home subdistrict as defined in 59C-2.200, Florida Administrative Code, the Agency shall award a certificate of need if the applicant meets all applicable criteria for a geographically underserved area as specified in subsection 408.032(18), Florida Statutes, and if the applicant meets the applicable statutory certificate of need review criteria specified in section 408.035, Florida Statutes, including bed need according to the relevant bed need formula contained in this rule. If the applicant is awarded a certificate of need based on the provisions of this paragraph, the applicant shall agree that the nursing facility will be located in a county without a nursing facility, or in the center of an area within the subdistrict of a radius of at least 20 miles which meets the definition of a geographically underserved area. The center of the geographically underserved area shall be the proposed nursing home location in the application.

Neither of the co-batched applications were submitted to remedy a geographically underserved area as defined above.

- b. **Proposed Services.** Applicants proposing the establishment of Medicare-certified nursing facility beds to be licensed under Chapter 400, Florida Statutes, shall provide a detailed description of the services to be provided, staffing pattern, patient characteristics, expected average length of stay, ancillary services, patient assessment tools, admission policies and discharge policies.

PruittHealth-Hillsborough County, LLC (CON application #10509) provides the following list of identified essential services:

- 24-hour nursing services
- Physical therapy
- Occupational therapy
- Speech therapy
- IV therapy
- Tube feeding and total nutrition
- Wound care management
- Pain management
- Central lines
- Oxygen therapy
- Outpatient therapy

CON Action Numbers: 10509 and 10510

The applicant maintains that the facility will have special amenities and its facility design and programs will be tailored to meet the needs of the local community. These amenities include wireless internet, a library, a coffee shop, themed lounges, a personal satellite television, a movie theater and a sports bar among others. Additional services intended to be offered at the facility will include:

- Dietetic programming and nourishment care
- Recreational activities programming
- Counseling services
- Religious services
- Laundry services
- Beauty/barber services
- Pharmacy services
- Volunteer services
- Medication management
- Chronic disease management
- Bariatric programming (specialized training and design features)

Other service offerings and programs to be made available at the proposed facility are documented on pages 91 – 116 of CON application #10509. The applicant provides descriptions of equipment and service offerings on pages 66-71 of CON application #10509. Services to be included are summarized below:

- Programs to reduce hospital readmissions (INTERACT 3.0)
- All private rooms
- Resident safety technologies
- Electronic medical records
- PT/OT/ST
 - Nautilus Leg Press
 - Nautilus Triceps Press
 - Nautilus Compound Row
 - Nautilus Low Back
 - Nautilus 4-Way Neck
 - Nautilus Leg Extension
 - Biodex Balance System
 - Biodex Gait Trainer
 - Biodex Un-weighing System
 - Biodex Biostep
 - Accelerated Care Plus Modalities
 - Ultrasound
 - Shortwave Diathermy
 - Electrical Stimulation

CON Action Numbers: 10509 and 10510

The applicant includes a sample of PruittHealth's 2017 Quality Report in the Supporting Documents section of the application, the Supporting Documents tab also includes admission, admission assessments, discharge planning and related forms.

The applicant states that the proposed facility will have strict admissions policies to accurately screen inquiries to assure the appropriateness of facility placement and to assure medical necessity of services. The applicant insists that based on information gathered during preadmission screening, the Admissions Committee, in consultation with the facility's medical director, will determine if the facility is the appropriate setting for the prospective resident. PruittHealth indicates that the proposed facility will develop a discharge plan for each resident from the day of admission for a smooth transfer of the resident from the facility to home or another care setting to provide continuity of care.

Proposed staffing for the applicant's 105-bed and 84-bed partial project are included in the following tables:

CON Action Numbers: 10509 and 10510

PruittHealth - Hillsborough, LLC: Proposed Staffing 105 beds		
Position	Year One FTEs	Year Two FTEs
Administration		
Administrator	1.0	1.0
Director of Nursing	1.0	1.0
Admissions Director	1.0	1.0
Marketing Representative	1.0	1.0
Secretary	1.4	1.4
Medical Records Clerk	1.0	1.0
Other: Financial Counselor	1.0	1.0
Physicians		
Medical Director (Contracted Svc)	0.2	0.2
Other: Physician Svcs (Contracted Svc)	0.02	0.02
Nursing		
RN	4.8	8.2
LPN	7.2	16.80
Nurses' Aides	18.6	50.4
Other: RN MDS Nurse	0.7	2.0
Ancillary		
Physical Therapist (Contracted Svc)	1.61	4.03
Physical Therapist Assistant (Contracted Svc)	0.51	1.26
Speech Therapist (Contracted Svc)	0.59	1.5
Occupational Therapist (Contracted Svc)	1.95	4.88
Occupational Therapist Assistant (Contracted Svc)	0.09	0.24
Other: Rehab Aide	1.0	1.0
Dietary		
Dietary Supervisor	1.0	1.0
Cooks	1.4	2.4
Dietary Aides	2.6	6.0
Social Services		
Social Services Director	1.0	1.0
Activity Director	1.0	1.0
Housekeeping		
Housekeepers	4.9	9.8
Laundry		
Laundry Aides	1.4	2.8
Plant Maintenance		
Maintenance Supervisor	1.0	1.0
Total	58.64	122.93

Source: CON application #10509, Schedule 6

CON Action Numbers: 10509 and 10510

PruittHealth – Hillsborough, LLC: Proposed Staffing 84 beds		
Position	Year One FTEs	Year Two FTEs
Administration		
Administrator	1.0	1.0
Director of Nursing	1.0	1.0
Admissions Director	1.0	1.0
Marketing Representative	1.0	1.0
Secretary	1.4	1.4
Medical Records Clerk	0.7	1.0
Other: Financial Counselor	1.0	1.0
Physicians		
Medical Director (Contracted Svc)	0.2	0.2
Other: Physician Svcs (Contracted Svc)	0.02	0.02
Nursing		
RN	4.6	7.2
LPN	5.4	11.20
Nurses' Aides	15.4	42.0
Other: RN MDS Nurse	0.7	2.0
Ancillary		
Physical Therapist (Contracted Svc)	1.35	3.37
Physical Therapist Assistant (Contracted Svc)	0.42	1.05
Speech Therapist (Contracted Svc)	0.48	1.25
Occupational Therapist (Contracted Svc)	1.61	4.07
Occupational Therapist Assistant (Contracted Svc)	0.08	0.2
Other: Rehab Aide	1.0	0.0
Dietary		
Dietary Supervisor	1.0	1.0
Cooks	1.4	2.4
Dietary Aides	2.5	5.0
Social Services		
Social Services Director	1.0	1.0
Activity Director	1.0	1.0
Housekeeping		
Housekeepers	4.7	8.4
Laundry		
Laundry Aides	1.4	2.8
Plant Maintenance		
Maintenance Supervisor	1.0	1.0
Total	52.33	102.56

Source: CON application #10509, Schedule 6

PHH’s Schedule 7 indicates that the average length of stay (ALOS) will be 59.73 days for year one and 58.54 days for year two of operation for the full award. PHH’s Schedule 7 indicates that the ALOS will be 58.75 days for year one and 58.54 days for year two of operation for the partial award.

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510) does not respond directly to this criteria, summaries of service offerings and expansions at existing campuses and developing programs are provided throughout the application. STHCC indicates that the specialized sub- acute rehabilitation and recovery programs include:

- Nursing
- Speech language pathology
- Health informatics
- Kinesiology
- Mental health counseling
- Orthodontics
- Pre-professional studies

STHCC states that the comprehensive array of sub-acute services to be provided by the applicant are grouped into two broad categories:

- Primary Diagnosis/Incident-Specific sub-acute rehabilitative programs and services
 - Cardiovascular patients (e.g. congestive heart failure, left ventricular assist device), equipment and service needs are noted to include HUR rehabilitation equipment and a compressed-air controlled equipment
 - Neurological patients (e.g. cerebral vascular accident/stroke, Parkinson's), equipment and service needs are noted to include physical, occupational and speech therapy including an Alter G Anti-Gravity Treadmill and Dynamic Stair Trainer, Lee Silverman Voice Treatment Loud Program and Lee Silverman Voice Treatment BIG Program
- Pulmonary Care (Respiratory) Rehabilitative Programs and Services
 - Chronic Obstructive Pulmonary Disease patients (e.g. physical, occupational, speech and respiratory therapy)
- Advanced Sub-Acute Services Across Diagnoses

A list of advanced sub-acute services with narrative descriptions is provided on pages 18 – 28 of CON application #10510. Schedule C of CON application #10510 is also conditioned to the provision of unique high-intensity sub-acute rehabilitative programs and services for residents, which are provided on pages five and six of this document.

CON Action Numbers: 10509 and 10510

Pictures of architectural features, renovations and amenities available at CCHC facilities are included in Appendix H of CON application #10510. Appendix E of CON application #10510 also includes select equipment descriptions and additional information regarding therapy and recovery services.

Proposed staffing for the addition of 21 community nursing home beds is included below:

Sun City Center Associates, LTD (L.P.): Forecasted Staffing to be Added by this Project		
Position	Year One FTEs	Year Two FTEs
Administration		
Medical Records Clerk	1.0	1.0
Other: Administration	1.0	1.0
Nursing		
RN	1.5	1.5
LPN	4.0	4.0
Nurses' Aide	10.0	10.0
Ancillary		
Physical Therapist	1.0	1.0
PTA	1.2	1.2
Speech Therapist	0.5	0.5
Other: Administration	0.9	0.9
COTA	1.0	1.0
Dietary		
Cooks	1.0	1.0
Food Service Aides	1.0	1.0
Social Services		
Social Services Director	0.5	0.5
Housekeeping		
Housekeepers	1.5	1.5
Laundry		
Laundry Aides	1.0	1.0
Total	27.1	27.1

Source: CON application #10510, Schedule 6A

Appendix G of CON application #10510 includes a list of clinical staff members with specialized training and/or certification.

STHCC's Schedule 5 and 7 indicates that the ALOS will be 43.05 for year one and 42.45 for two of operation for the 21-bed addition.

- c. **Quality of Care. In assessing the applicant's ability to provide quality of care pursuant to s. 408.035 (1) (c), Florida Statutes, the agency shall evaluate the following facts and circumstances:**

1. **Whether the applicant has had a Chapter 400, Florida Statutes, nursing facility license denied, revoked or suspended within the 36 months prior to the current application.**

PruittHealth-Hillsborough County, LLC (CON application #10509) states that none of the facilities operated by its parent company have ever had licenses denied, revoked or suspended within the past 36 months.

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510) does not respond to this criterion, but the reviewer confirms that STHCC has not had a license denied, revoked or suspended within the 36 months prior to the current application.

2. **Whether the applicant has had a nursing facility placed into receivership at any time during the period of ownership, management or leasing of a nursing facility in the 36 months prior to the current application?**

PruittHealth-Hillsborough County, LLC (CON application #10509) states that none of the facilities operated by its parent company have had a license placed into receivership within the past 36 months.

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510) does not respond to this criterion, but the reviewer confirms that STHCC has not been placed in receivership within the past 36 months.

3. **The extent to which the conditions identified within subparagraphs 1 and 2 threatened or resulted in direct significant harm to the health, safety or welfare of the nursing facility residents.**

PruittHealth-Hillsborough County, LLC (CON application #10509) states that this criterion is not applicable.

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510) does not respond to this criterion but the reviewer notes that the criterion is not applicable.

4. **The extent to which the conditions identified within subparagraph 3 were corrected within the time frames allowed by the appropriate state agency in each respective state and in a manner satisfactory to the Agency.**

PruittHealth-Hillsborough County, LLC (CON application #10509) states that this criterion is not applicable.

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510) does not respond to this criterion but the reviewer notes that the criterion is not applicable.

5. **Rule 59C-1.036 (4) (f) Harmful Conditions. The Agency shall question the ability of the applicant to provide quality of care within any nursing facility when the conditions identified in the subparagraph (e) 1 and (e) 2 result in the direct, significant harm to the health, safety or welfare of a nursing facility resident, and were not corrected within the time frames allowed by the appropriate state agency in each respective state and in a manner satisfactory with the Agency.**

PruittHealth-Hillsborough County, LLC (CON application #10509) states that this criterion is not applicable as nothing was identified above.

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510) does not respond to this criterion but the reviewer notes that the criterion is not applicable.

- d. **Rule 59C-1.036 (5) Utilization Reports. Within 45 days after the end of each calendar quarter, facilities with nursing facility beds licensed under Chapter 400, Florida Statutes shall report to the Agency, or its designee, the total number of patient days, which occurred in each month of the quarter, and the number of such days that were Medicaid patient days.**

PruittHealth-Hillsborough County, LLC (CON application #10509) states that it will provide the required data in compliance with this criterion.

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510): The applicant does not respond to this criteria but the reviewer notes that STHCC does currently provide the required data in compliance with this criterion.

3. Statutory Review Criteria

- a. Is need for the project evidenced by the availability, quality of care, accessibility and extent of utilization of existing health care facilities and health services in the applicants service area? ss. 408.035 (1)(b) and (e), Florida Statutes.**

PruittHealth-Hillsborough County, LLC (CON application #10509) describes the demographic features of Hillsborough County and specifically notes that 185,673 of 1.38 million residents are 65+. Elderly individuals are also noted to be frequent utilizers of SNFs. PHH also notes that the service area has a bed to population ratio of 20.2 beds per 1,000 adults aged 65+ and in comparison, the State of Florida has a bed to population ratio of 21.3 beds per 1,000 adult aged 65+. The applicant also provides a historical overview of Hillsborough County from July 2016 – June 2017 (86.04 percent).

PHH states that there are typically two categories of patients in SNFs—skilled (i.e. rehabilitation) and long-term care. The applicant notes that skilled patients are commonly Medicare residents and long-term care residents are typically enrolled in Medicaid Long Term Care plans, many of whom enroll after initially being shorter-term Medicare patients. PHH notes that there are 277,000 Medicaid enrollees in Hillsborough County.

The applicant describes how the Medicaid enrollment in Hillsborough County has increased nearly 30.0 percent over the past three years—exceeding other populous urban counties in the state. PHH notes that Medicaid patient days are a lower proportion of total patient days in Subdistrict 6-1 than in District 6 and the State of Florida. The applicant maintains that resources will be dedicated to serving patients in need of Medicaid Long Term Care. PHH indicates that Medicaid accounted for 59.6 percent of patient days in Hillsborough County. Summaries of

CON Action Numbers: 10509 and 10510

District 6 occupancy and Medicaid proportions by District are included on pages 127 – 128. The applicant includes the following table and identifies a disparity between the volume of Medicaid patient days provided within District 6 and Hillsborough County in comparison to other geographic areas.

Florida Skilled Nursing Facility Medicaid Patient Days by District 12 Months Ending June 30, 2017		
District	Medicaid Days	Medicaid Percent of Total Days
District 10	771,168	59.3%
Subdistrict 6-1	702,563	59.6%
District 8	1,282,010	59.6%
District 6	1,668,200	60.4%
District 7	1,806,594	60.9%
District 9	1,646,831	61.9%
District 4	1,850,525	62.8%
Florida	16,077,665	63.3%
District 5	1,985,889	63.8%
District 3	1,591,929	64.2%
District 1	683,558	65.4%
District 11	1,980,932	70.3%
District 2	810,029	71.3%

Source: CON application #10509, page 128

PHH identifies the need to provide a quality of life environment and achieve Quality Measures as outlined within the Working Group Recommendations, Florida Nursing Home Prospective Payment Report dated November 30, 2017. In addition to these parameters the applicant expresses the intent to develop quality measures as defined by the Donabedian Model of Quality (Structures, Process and Outcomes).

The applicant maintains that residents in Subdistrict 6-1 with Medicaid have less access to private accommodations than residents with other payers. PHH provides a table documenting the existing room configurations within Hillsborough County noting that overall 11.2 percent of beds in Hillsborough County are within private rooms. PruittHealth concludes that within nursing homes that treat “larger” percentages of Medicaid patients, only 5.0 percent of the bed inventory is private (CON application #10509, Page 129).

PHH maintains that private rooms often have a significant impact on a host of considerations important to patients, including quality, affordability and access. The applicant maintains that higher ratios of private to semi-private configurations within nursing homes are linked to higher quality of care and greater satisfaction. The reviewer notes that

CON Action Numbers: 10509 and 10510

data is not provided to support these conclusions. Moreover PHH asserts that private rooms are more commonly reserved for Medicare or commercially insured residents in SNFs as opposed to Medicaid residents. The applicant maintains that it will seek to differentiate itself in this market by providing Medicaid residents with equal opportunity to private rooms. PHH provides a table which depicts the private bed ratio to provision of Medicaid. See the table below:

Subdistrict 6-1 Nursing Facilities with Greater than 60.0 Percent of Patient Days Being Medicaid 12 Months Ending June 30, 2017			
Facility	Medicaid (%)	Private Beds	Private Bed Percentage
Bristol at Tampa Rehabilitation and Nursing Center, LLC	79.9%	2	0.8%
Carrollwood Care Center	63.0%	4	3.3%
Central Park Healthcare and Rehabilitation Center	62.1%	12	10.0%
Community Convalescent Center	67.1%	0	0.0%
Excel Care Center	62.3%	8	6.7%
Fairway Oaks Center	84.9%	0	0.0%
Fletcher Health and Rehabilitation Center	68.5%	4	3.3%
Habana Health Care Center	70.9%	6	4.0%
Home Association, The	65.0%	78	81.3%
Palm Garden of Tampa	60.5%	4	3.3%
Rehabilitation and Healthcare Center of Tampa	68.7%	18	10.3%
Solaris Healthcare Plant City	64.3%	30	16.7%
South Tampa Health and Rehabilitation Center	66.7%	12	7.5%
Whispering Oaks	84.6%	0	0.0%
Woodbridge Rehabilitation and Health Center	74.0%	2	1.7%
Ybor City Healthcare and Rehabilitation Center	77.6%	2	2.5%
Subdistrict 6-1 Total	71.1%	182	5.1%

Source: CON application #10509, page 132

PHH discusses the projected provision of Medicaid at the facility, specifically states that in year two 64.3 percent of patient days will be apportioned to Medicaid patients. In the event that the full 105-bed award is provided, the applicant states that the private bed inventory of Hillsborough County will increase by 28.0 percent to 478 beds. The applicant notes that if the partial (84-bed) proposal is awarded, the private bed inventory will increase by 23.0 percent to 458 beds.¹

In consideration of stabilized occupancy rates within the market, PHH maintains that nursing home beds are not available to meet incremental demands and most of the available beds are within semi-private accommodations. The applicant states that the lack of availability of private beds contributes to issues such as co-mingling genders or co-

¹ In the event that the full 105-bed award is provided, the applicant states that the private bed inventory of Hillsborough County will increase by 25.0 percent to 527 beds. If the partial 84-bed proposal is awarded, the private bed inventory of the County will increase by 20.0 percent to 458 beds (CON application #10509, page 60).

morbid conditions. PHH expects for its commitment to serve Medicaid enrollees and provide an all-private facility to positively impact Hillsborough County residents.

The applicant expresses the intent to develop programs, services, protocols and exceed benchmarks in an effort to ultimately achieve AHCA Gold Seal eligibility. PHH notes that while there are no existing AHCA Gold Seal Award nursing facilities within the service area, PruittHealth – Santa Rosa was awarded the status from July 1, 2016 to May 15, 2017. The applicant describes the historical performance of PruittHealth nursing facilities and rehabilitation centers in comparison to non-profit companies in the CMS Five Star Quality Rating System. Of particular importance, PHH states that 15.0 percent of PruittHealth SNFs had deficiency-free surveys in FY 2017 in comparison to 7.0 percent of SNFs nationally.

PHH is a newly formed entity and therefore does not have a historical quality record available to document in this CON proposal. The applicant states that implementation of this project will involve the development of all quality policies and procedures and a quality assurance program based on its other PruittHealth affiliated facilities nationally. PHH expresses a commitment to adhere to any and all State and Federal nursing home regulations and statutes in addition to Medicare's Conditions of Participation. The applicant states that the application is conditioned on the provision that it will seek Joint Commission Accreditation, which the reviewer has previously noted is prohibited by Section 408.043 (4) Florida Statutes.

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510): The applicant indicates that the proposed project is best positioned to address the community needs of residents in Hillsborough County as demonstrated by the following:

- An experienced, local community nursing home management team, with headquarters and a training facility in Florida, will establish and operate the proposed project. This management team is innovative and continues to “raise the bar” on SNF facilities in Florida, as illustrated by the following:
 - Innovative program offerings, illustrated by university-based intergenerational programs, services and activities available to residents.
 - Ever-improving facility design based on resident and families’ needs and expectations for an active life experience and activity-focused community.
 - Implementation of Agency-approved projects on-schedule.

CON Action Numbers: 10509 and 10510

- Recognition that financial viability for SNFs, in the short – and long-term, is typically best achieved with minimum-sized 100-bed facility due to the economies of scale and efficiencies gained.
- Comprehensive continuity of care provided for SNF residents, including the sub-acute level of high-intensity rehabilitative services provided by certified clinical staff using advanced equipment and facilities to ensure optimal patient outcomes and recovery. Specifics include:
 - Specialized and high-intensity rehabilitative programs and services available for all residents.
 - Advanced rehabilitative equipment necessary for high-intensity rehabilitative care.
 - Certified staff members ensure high quality, specialized rehabilitative services are provided.
 - Low hospital readmission rates document success of sub-acute services.
 - Sub-acute SNF services are a critical component in the continuity of care.
 - The project will address a growing need for advanced rehabilitative services in Hillsborough County.
- Design and management of the facility by a community-focused organization that tailors its facility, programs and services, and community giveback programs to the local communities' needs with the goal of ensuring resident choice, independence and dignity.
- The proven programs and services to be provided will ensure that the highest quality nursing home services are available to the residents in Hillsborough County, evidenced by three Governor's Gold Seal facilities and six facilities with four or five-star rankings based on the CMS national standards.

The applicant states that the intent of this proposal is to increase the availability and access to sub-acute care rehabilitation and recovery services for all patients in the service area, including those who are medically complex and/or require specialized equipment/staffing such as aquatic therapy, antigravity treadmill and other resources. STHCC indicates that the proposal will offer proven high quality services to area residents as evidenced by the applicant's affiliate facilities' historical quality performance. As an existing provider of sub-acute care services throughout Florida, the applicant expects for the proposal to be developed successfully with the maintenance of ongoing operations. STHCC maintains that the uniqueness of sub-acute care services provided by CCHC facilities distinguishes the application from all the existing health care providers in the area, the competing application and the typical SNF application.

CON Action Numbers: 10509 and 10510

The applicant discusses the insufficient capacity for sub-acute rehabilitation and recovery services at area hospitals and other providers for Subdistrict 6-1 residents. STHCC identifies a growing need in service delivery for sub-acute care/high-intensity rehabilitative services. The reviewer notes that the applicant has not provided data reflecting a disparity in access for sub-acute/high-intensity rehabilitative services for residents of the service area.

STHCC notes the unique and beneficial aspects of the programs and services provided among CCHC facilities are that these aspects are lauded in the letters of support from area medical providers. The applicant states that the extensive listing of equipment provided previously and conditions to the application regarding specialized equipment are evidence of the recognition of the value of investing in advanced equipment, training and the ultimate value these investments provide in terms of positive benefits and desired outcomes for patients. STHCC maintains that these service offerings and the conditions to the CON application ensure that staff members are trained and/or certified in all aspects of high-intensity rehabilitative services offered in order to ensure the highest quality care to residents. The applicant indicates that the proposed facility design is suited to the provision of these types of services.

As a result of its provision of intensive rehabilitation and recovery programs, STHCC maintains that a network of referral relationships with short-term acute care hospitals and area physicians are already in place. The applicant cites that letters of support from physicians in Appendix F of CON application #10510 laud STHCC as a provider.

The applicant states that CCHC has a documented historical record of providing quality and references the performance records of its existing nursing homes through such accolades and performance reviews like Gold Seal Awards as well as CMS and Agency nursing home quality ratings. The applicant provides a summary of architectural aspects of its proposed project and existing campus that will allow for the provision of sub-acute high intensity rehabilitative services in addition to managing quality and outcomes (CON application #10510, page 49).

As a result of being an existing provider, the applicant expects for the proposal to be developed successfully with ongoing operations at the existing facility being maintained efficiently. STHCC anticipates that the proposed expansion will require minimal project costs and result in minimal disruption to existing residents in light of the existing campus' infrastructure.

The applicant states that the fixed need pool demonstrates need based on the existing subdistrict's occupancy and maintains the uniqueness of services identified throughout this application distinguish STHCC from existing and proposed health care providers in the area.

- b. Does the applicant have a history of providing quality of care? Has the applicant demonstrated the ability to provide quality of care? Is the applicant a Gold Seal Program nursing facility that is proposing to add beds to an existing nursing home? ss. 408.035 (1) (c) and (j), Florida Statutes.**

PruittHealth-Hillsborough County, LLC (CON application #10509) is a newly formed entity and therefore does not have a historical quality record available to document in this CON proposal. The applicant states that implementation of this proposal will involve the development of all quality policies and procedures and a quality assurance program based on its other PruittHealth affiliated facilities nationally. PHH expresses a commitment to adhere to any and all state and federal nursing home regulations/statutes in addition to Medicare's Conditions of Participation. The applicant states that the application is conditioned on the provision that it will seek Joint Commission Accreditation, which the reviewer has previously noted is prohibited by Section 408.043 (4) Florida Statutes.

PHH describes its historical provision of administrative services to more than 90 SNFs in Georgia, North Carolina and Florida. The applicant asserts its commitment to provide the appropriate level of comprehensive, high-quality, safe and cost-effective nursing care services to persons in need of such care. PruittHealth maintains that its organizational experience and expertise in providing quality skilled nursing services is evidenced by the number of successful programs and quality assurance practices. The applicant describes how the proposed program will consist of assigned patient care managers, a care transition program, corporate standards, leadership/training, external benchmarking, continuous process improvement, customer service and transparency.

CON Action Numbers: 10509 and 10510

PruittHealth includes narrative descriptions of quality assurance initiatives currently in place at its existing facilities within and outside of the State of Florida which are to be implemented as quality mechanisms as a part of this proposal and distinctions on pages 134 – 146 of CON application #10509. Bulleted subheadings of these descriptions are included below:

- Commitment to Caring campaign
- Corporate standards
- Memberships and awards
- CMS five-star rating (including deficiency-free CMS surveys)
- The Joint Commission Accreditation
- *U.S. News & World Report* – Best Nursing Homes in the U.S. (PruittHealth – Santa Rosa)
- State awards (Georgia Health Care Association)
- External benchmarking
- PruittHealth consulting services
- PruittHealth pharmacy
- Benchmarking tools
- CMS Quality Improvement Organization (QIO)
- Satisfaction surveys
- Care transitions and clinical pathways
- Interventions to reduce hospital readmissions (INTERACT program)
- Performance improvement program
- Peer review program
- Specialist consultants
- Care Guard
- PointRight
- Staffing, training and career development
- Customer service and transparency
- Senior care partner program
- Care Ambassador program
- Green Sweep program

Specific to pertinent areas of its quality initiatives, the applicant discusses how PruittHealth’s affiliated facilities and agencies participate in multiple external benchmarking studies in order to be abreast of contemporary quality care practices. PHH also describes the use of the ABAQIS quality indicator program which provides reports targeted to quality assurance and improvement in 26 different care areas linked to federal and state regulations.

CON Action Numbers: 10509 and 10510

The applicant notes that internal reports (e.g. monthly quality indicator reports) are also used at PruittHealth to provide a systematic means of collecting data on quality indicators from individual facilities in order to determine patterns, trends and resource allocations as a part of the overall performance improvement process.

PHH asserts that LTC TrendTracker is also used as a data collection and benchmarking tool across its facilities to compare staffing levels, resident characteristics, survey findings, revenue/cost, Medicare patient days and quality measures with its peers. LTC TrendTracker collects data from CMS, CASPER and the NH Quality Measure Report.

PruittHealth also discusses its Performance Improvement Process (PIP) which it states demonstrates its strong commitment to continuous quality improvement by providing an avenue to continuously improve care and services to the residents, family members and staff of its facilities. PHH states that the process is coordinated by the facility administrator and designed to initiative positive improvements through a strategic change process. The applicant maintains PIP is derived from company policies and procedures, standards for licensure/certification, identify standards and quality benchmarks. PHH maintains that PIP monitors and obtains information from the reports of various facility committees, consultant reviews, surveys, monthly quality assurance key indicator data and internal staff audits.

PruittHealth states that reducing hospital admissions is the top priority of hospitals throughout the nation and its targeted subdistrict. For this reason, the applicant states that a major emphasis will be placed on safely reducing hospital readmissions at PHH. In order to address hospital readmissions, the applicant states that PruittHealth has adopted INTERACT 3.0, a comprehensive program with tools specifically designed to decrease 30-day patient re-hospitalizations. PruittHealth describes INTERACT (Interventions to Reduce Hospital Readmissions) as a program integrated between different levels of care to reduce hospital admissions by addressing clinical symptoms before they escalate to need of a transfer of a resident to the hospital. PHH indicates that INTERACT supports the goals of the nation's health care system and industry advocates in reducing overall health care costs and improving quality through measures taken to decrease patient re-hospitalizations.

Descriptions of tools used in the INTERACT program are included on pages 30-31 of CON application #10509, supporting documents to the application also include samples of forms and tools used.

CON Action Numbers: 10509 and 10510

In supporting documents included with CON application #10509, the applicant includes descriptions of the following quality areas:

- 2017 quality report, PruittHealth
- Abaqis User manual
- Admission and discharge planning policies and procedures
- Care Guard program
- Interact forms
- Interact overview
- PerfectPath program (and UniPath Clinical Pathways)
- PointRight QAPI
- PointRight user manual
- UniPath specialty care programs
- UniRes program policy
- CallGuard and WanderGuard system

PruittHealth currently operates PruittHealth – Santa Rosa in Santa Rosa County (Subdistrict 1-1). Agency records indicate for the three-year period between December 27, 2014 and December 27, 2017, the provider had three substantiated complaints which are summarized in the table below:

PruittHealth - Santa Rosa, Three Year Substantiated Complaint History	
Complaint Category	Number Substantiated
Quality of Care/Treatment	2
Billing/Refunds	1
Total Number of Substantiated Complaints	3

Source: Agency Complaint Records, December 27, 2014 – December 27, 2017

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510) provides descriptions as an existing provider of its documented quality history, measures, policies and procedures to be implemented with the addition of the proposal. Through its relationship with its management entity CCHC, the applicant documents its historical legacy as a quality provider throughout the State of Florida. STHCC indicates that the policies and procedure currently in place will serve as the policies and procedures implemented for the proposed SNF bed addition. The applicant states that these policies and procedures encompass quality of care, patients’ rights, safety, clinical guidelines and staff competencies while providing reinforcement of the ethical standards that are components of STHCC’s approach to care.

STHCC provides a summary of its capacity to respond to emergency situations and discusses its compliance history with the Governor’s emergency rule for generators (CON application #10510, page 43).

CCHC describes how the unique architectural design currently being implemented at STHCC supports the intensive, high quality rehabilitation and recovery programs and culture of the provider. The applicant states that the design of the existing campus embraces culture change with a progressive concept, thoughtful amenities and efficient operations – all designed with the residents’ quality of life in mind, including intensive rehabilitation and recovery needs. STHCC indicates that the expansion project will be in an extensively renovated and expanded facility that offers a resort-style facility, incorporating a multitude of destinations under one facility while providing residents with a range of activities and social interaction opportunities. STHCC states that the inclusion of courtyards will also allow for residents to enjoy time outdoors in a safe and comfortable environment.

The applicant states that the exclusive use of private rooms will result in privacy, dignity and quality of life enhancements provided by the exclusive use of private rooms, infection control and isolation precautions when needed without inconveniencing residents within the building to create an isolation room. STHCC indicates that the facility has been designed to meet the needs of SNF residents by providing opportunities for resident choices and independence throughout the physical programmatic functioning with an emphasis on dignity. The applicant notes that design components enable the applicant to care for residents who are terminally ill and provide support to their friends and families.

STHCC states that the majority of the building will be single-story with a two-story portion at the main entrance which will include therapy gyms and two aquatic pools.

The applicant determines that the facility design, intensive rehabilitation, recovery programs and overall focus on residents’ quality of life will result in a relative costlier SNF than other applicants would be willing to invest in the community. STHCC expects the proposal to be financially feasible in the short and long-term. The applicant provides the following table providing a summary of its historical quality performance at existing facilities:

CON Action Numbers: 10509 and 10510

Florida Nursing Home Facilities Managed by Clear Choice Health Care				
Facility Name	Quality Ratings		City	County
	Governor's Gold Seal	CMS Rating		
Belleair Health Care Center	(Pending)	5-star	Clearwater	Pinellas
Centre Pointe Health & Rehab Center	✓	5-star	Tallahassee	Leon
Conway Lakes Health & Rehab Center	✓	5-star	Orlando	Orange
East Bay Rehabilitation Center		2-star	Clearwater	Pinellas
Melbourne Terrace Rehabilitation Center	✓	2-star	Melbourne	Brevard
Port Charlotte Rehabilitation Center		5-star	Port Charlotte	Charlotte
Spring Lake Rehabilitation Center		4-star	Winter Haven	Polk
Sun Terrace Health Care Center		5-star	Sun City Center	Hillsborough

Source: CON application #10510, page 51

The applicant notes that three of eight nursing homes under its operation have received the Governor’s Gold Seal Award and six of eight nursing home facilities under its operation have CMS four or five-star quality ratings. Similarly, the applicant also notes that 63.0 percent of CCHC facilities have received a five-star rating from the Agency.

STHCC indicates utilizing CMS and Agency star ratings for internal benchmarking purposes to continually improve upon its quality of care and the overall delivery of services to residents. The applicant maintains that the unique architectural design of the facility supports intensive high-quality rehabilitation and recovery programs which will be continued with the proposed expansion.

In Appendix J of CON application #10510, samples of select policies, procedures and guidelines are provided.

Agency records indicate that for the three-year period between December 27, 2014 and December 27, 2017, Sun Terrace Health Care Center had three substantiated complaints. The two substantiated complaints categories for these complaint were: resident/patient/client rights and admission, transfer and discharge rights.

Agency records indicate that for the three-year period between December 27, 2014 and December 27, 2017, facilities operated by the applicant had 20 substantiated complaints. A single complaint can encompass multiple complaint categories. The substantiated complaint categories are listed below:

CON Action Numbers: 10509 and 10510

Nursing Homes affiliated with Clear Choice Health Care Substantiated Complaints for the Three Years Ending December 27, 2017	
Complaint Category	Number Substantiated
Quality of Care/Treatment	13
Resident/Patient/Client Rights	5
Administration/Personnel	2
Admission, Transfer & Discharge Rights	2
Resident/Patient/Client Assessment	2
Dietary Services	1
Misappropriation of Property	1

Source: Florida Agency for Health Care Administration Complaint Records

- c. What resources, including health manpower, management personnel and funds for capital and operating expenditures, are available for project accomplishment and operation? ss. 408.035 (1)(d), Florida Statutes.**

PruittHealth-Hillsborough County, LLC (CON application #10509):

Analysis:

The purpose of our analysis for this section is to determine if the applicant has access to the funds necessary to fund this and all capital projects. Our review includes an analysis of the short and long-term position of the applicant, parent, or other related parties who will fund the project. The analysis of the short and long-term position is intended to provide some level of objective assurance on the likelihood that funding will be available. The stronger the short-term position, the more likely cash on hand or cash flows could be used to fund the project. The stronger the long-term position, the more likely that debt financing could be achieved if necessary to fund the project. We also calculate working capital (current assets less current liabilities) a measure of excess liquidity that could be used to fund capital projects.

Historically we have compared all applicant financial ratios regardless of type to bench marks established from financial ratios collected from Florida acute care hospitals. While not always a perfect match to a particular CON project it is a reasonable proxy for health care related entities. The applicant provided audited financial statements for PruittHealth – Hillsborough County, LLC, a development stage company. The applicant provided partial audited financials for the parent (United Health Services, Inc. and Subsidiaries), however what was provided is not sufficient for analysis.

Capital Requirements and Funding:

The applicant indicates on Schedule 2 capital projects totaling \$23,025,320, which consists solely of this project. The applicant states on Schedule 3 that funding for this project will come from operating cash flows and non-related company financing. The applicant provided a letter of interest from Synovus. However, a letter of interest is not a commitment to lend. The applicant also provided a document showing available balances for various lines of credit, but this document is unaudited. Additionally, the applicant provided a letter from the parent company pledging financial support for the project and an audited statement of cash flows to show availability of operating cash flows. No balance sheet or income statement was provided.

Conclusion:

Funding for this project is in question.

Analysis (Partial Request):

The purpose of our analysis for this section is to determine if the applicant has access to the funds necessary to fund this and all capital projects. Our review includes an analysis of the short and long-term position of the applicant, parent, or other related parties who will fund the project. The analysis of the short and long-term position is intended to provide some level of objective assurance on the likelihood that funding will be available. The stronger the short-term position, the more likely cash on hand or cash flows could be used to fund the project. The stronger the long-term position, the more likely that debt financing could be achieved if necessary to fund the project. We also calculate working capital (current assets less current liabilities) a measure of excess liquidity that could be used to fund capital projects.

Historically we have compared all applicant financial ratios regardless of type to bench marks established from financial ratios collected from Florida acute care hospitals. While not always a perfect match to a particular CON project it is a reasonable proxy for health care related entities. The applicant provided audited financial statements for PruittHealth – Hillsborough County, LLC, a development stage company. The applicant provided partial audited financials for the parent (United Health Services, Inc. and Subsidiaries), however what was provided is not sufficient for analysis.

Capital Requirements and Funding:

The applicant indicates on Schedule 2 capital projects totaling \$21,154,618, which consists solely of this project. The applicant states on Schedule 3 that funding for this project will come from operating cash flows and non-related company financing. The applicant provided a letter of interest from Synovus. However, a letter of interest is not a commitment to lend. The applicant also provided a document showing available balances for various lines of credit, but this document is unaudited. Additionally, the applicant provided a letter from the parent company pledging financial support for the project and an audited statement of cash flows to show availability of operating cash flows. No balance sheet or income statement was provided.

Conclusion:

Funding for this project is in question.

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510):

Analysis:

The purpose of our analysis for this section is to determine if the applicant has access to the funds necessary to fund this and all capital projects. Our review includes an analysis of the short and long-term position of the applicant, parent, or other related parties who will fund the project. The analysis of the short and long-term position is intended to provide some level of objective assurance on the likelihood that funding will be available. The stronger the short-term position, the more likely cash on hand or cash flows could be used to fund the project. The stronger the long-term position, the more likely that debt financing could be achieved if necessary to fund the project. We also calculate working capital (current assets less current liabilities) a measure of excess liquidity that could be used to fund capital projects.

Historically we have compared all applicant financial ratios regardless of type to bench marks established from financial ratios collected from Florida acute care hospitals. While not always a perfect match to a particular CON project it is a reasonable proxy for health care related entities. The applicant provided audited financial statements for Miami Jewish Health Systems, Inc., and Subsidiaries, its parent company, where the short term and long-term measures fall on the scale (highlighted in gray) for the most recent year.

CON Action Numbers: 10509 and 10510

Sun City Center Associates, Ltd., (L.P.)		
	Dec-16	Dec-15
Current Assets	\$3,473,049	\$3,625,406
Total Assets	\$14,667,622	\$12,606,965
Current Liabilities	\$1,966,065	\$2,012,390
Total Liabilities	\$24,536,786	\$22,322,364
Net Assets	(\$9,869,164)	(\$9,715,399)
Total Revenues	\$22,860,981	\$23,454,736
Excess of Revenues Over Expenses	\$1,046,235	\$1,177,155
Cash Flow from Operations	\$77,844	\$1,706,449
Short-Term Analysis		
Current Ratio (CA/CL)	1.8	1.8
Cash Flow to Current Liabilities (CFO/CL)	3.96%	84.80%
Long-Term Analysis		
Long-Term Debt to Net Assets (TL-CL/NA)	-228.7%	-209.0%
Total Margin (ER/TR)	4.58%	5.02%
Measure of Available Funding		
Working Capital	\$1,506,984	\$1,613,016

Position	Strong	Good	Adequate	Moderately Weak	Weak
Current Ratio	above 3	3 - 2.3	2.3 - 1.7	1.7 - 1.0	< 1.0
Cash Flow to Current Liabilities	>150%	150%-100%	100% - 50%	50% - 0%	< 0%
Debt to Equity	0% - 10%	10%-35%	35%-65%	65%-95%	> 95% or < 0%
Total Margin	> 12%	12% - 8.5%	8.5% - 5.5%	5.5% - 0%	< 0%

Capital Requirements and Funding:

The applicant indicates on Schedule 2 capital projects totaling \$483,300, which includes this project, and routine capital of \$250,000.

The applicant indicated that the project will be funded from cash on hand and cash flow from operations. The applicant provided a copy of its audited financial statements for the period ending December 31, 2016, which indicated \$158,706 in cash & cash equivalents and \$77,844 in cash flow from operations. The financial statements do not support the applicant's claim of available funding.

Conclusion:

Funding for this project is uncertain.

- d. What is the immediate and long-term financial feasibility of the proposal? ss. 408.035 (1) (f), Florida Statutes.**

PruittHealth-Hillsborough County, LLC (CON application #10509):

Analysis:

The immediate and long-term financial feasibility of the project is tied to expected profitability. The purpose of our analysis for this section is to evaluate the reasonableness of the applicant’s profitability projections and ultimately, whether profitability is achievable for this project. Our analysis includes an evaluation of net revenue per patient day (NRPD), cost per patient day (CPD), nurse staffing ratios, and profitability. We compared the NRPD, CPD, and profitability to actual operating results from skilled nursing facilities as reported on Medicaid cost reports (2015, 2016, and 2017 cost report years). For our comparison group, we selected skilled nursing facilities with similar Medicaid utilizations to the utilization projected by the applicant on a per patient day basis (PPD). Comparison group data was adjusted for inflation to match the second year projection (inflation factor was based on the New CMS Market Basket Price Index as published in the 3rd Quarter 2017, Health Care Cost Review).

NRPD, CPD and profitability or operating margin that fall within the group range are considered reasonable projections. Below is the result of our analysis.

	PROJECTIONS PER APPLICANT		COMPARATIVE GROUP VALUES PPD		
	Total	PPD	Highest	Median	Lowest
Net Revenues	13,602,701	375	1,379	389	277
Total Expenses	12,666,109	349	1,318	382	245
Operating Income	936,592	26	67	8	-48
Operating Margin	6.89%		Comparative Group Values		
	Days	Percent	Highest	Median	Lowest
Occupancy	36,318	94.76%	97.67%	90.45%	66.62%
Medicaid	23,360	64.32%	70.00%	60.28%	50.58%
Medicare	11,498	31.66%	38.63%	18.84%	3.74%

The projected NRPD, CPD, and profit fall within the group range and are considered reasonable. Therefore, the overall profitability appears achievable.

Staffing:

Section 400.23(3)(a)(1), Florida Statutes, specifies a minimum certified nursing assistant staffing of 2.5 hours of direct care per resident per day and a minimum licensed nursing staffing of 1.0 hour of direct resident care per resident day. Based on the information provided in Schedule 6, the applicant meets this requirement.

Conclusion:

This project appears to be financially feasible based on the projections provided by the applicant.

Analysis (Partial Request):

The immediate and long-term financial feasibility of the project is tied to expected profitability. The purpose of our analysis for this section is to evaluate the reasonableness of the applicant’s profitability projections and, ultimately, whether profitability is achievable for this project. Our analysis includes an evaluation of net revenue per patient day (NRPD), cost per patient day (CPD), nurse staffing ratios and profitability. We compared the NRPD, CPD and profitability to actual operating results from skilled nursing facilities as reported on Medicaid cost reports (2015, 2016, and 2017 cost report years). For our comparison group, we selected skilled nursing facilities with similar Medicaid utilizations to the utilization projected by the applicant on a per patient day basis (PPD). Comparison group data was adjusted for inflation to match the second year projection (inflation factor was based on the New CMS Market Basket Price Index as published in the 3rd Quarter 2017, Health Care Cost Review).

NRPD, CPD and profitability or operating margin that fall within the group range are considered reasonable projections. Below is the result of our analysis.

	PROJECTIONS PER APPLICANT		COMPARATIVE GROUP VALUES PPD		
	Total	PPD	Highest	Median	Lowest
Net Revenues	11,267,597	381	1,379	389	277
Total Expenses	10,795,178	365	1,318	382	245
Operating Income	472,419	16	67	8	-48
Operating Margin	4.19%		Comparative Group Values		
	Days	Percent	Highest	Median	Lowest
Occupancy	29,565	96.43%	97.67%	90.45%	66.62%
Medicaid	18,250	61.73%	70.00%	60.28%	50.58%
Medicare	9,855	33.33%	38.63%	18.84%	3.74%

The projected NRPD, CPD, and profit fall within the group range and are considered reasonable. Therefore, the overall profitability appears achievable.

Staffing:

Section 400.23(3)(a)(1), Florida Statutes, specifies a minimum certified nursing assistant staffing of 2.5 hours of direct care per resident per day and a minimum licensed nursing staffing of 1.0 hour of direct resident care per resident day. Based on the information provided in Schedule 6, the applicant meets this requirement.

Conclusion:

This project appears to be financially feasible based on the projections provided by the applicant.

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510):

Analysis:

The immediate and long-term financial feasibility of the project is tied to expected profitability. The purpose of our analysis for this section is to evaluate the reasonableness of the applicant's profitability projections and, ultimately, whether profitability is achievable for this project. Our analysis includes an evaluation of net revenue per patient day (NRPD), cost per patient day (CPD), nurse staffing ratios and profitability. We compared the NRPD, CPD and profitability to actual operating results from skilled nursing facilities as reported on Medicaid cost reports (2015, 2016, and 2017 cost report years). For our comparison group, we selected skilled nursing facilities with similar Medicaid utilizations to the utilization projected by the applicant on a per patient day basis (PPD). Comparison group data was adjusted for inflation to match the second year projection (inflation factor was based on the New CMS Market Basket Price Index as published in the 3rd Quarter 2017, Health Care Cost Review).

NRPD, CPD and profitability or operating margin that fall within the group range are considered reasonable projections. Below is the result of our analysis.

CON Action Numbers: 10509 and 10510

	PROJECTIONS PER APPLICANT		COMPARATIVE GROUP VALUES PPD		
	Total	PPD	Highest	Median	Lowest
Net Revenues	21,822,302	474	623	485	221
Total Expenses	20,362,445	443	697	465	348
Operating Income	1,459,857	32	40	-28	-124
Operating Margin	6.69%		Comparative Group Values		
	Days	Percent	Highest	Median	Lowest
Occupancy	46,009	96.70%	96.80%	81.88%	66.02%
Medicaid	14,241	30.95%	35.37%	26.76%	7.10%
Medicare	20,083	43.65%	55.12%	43.98%	13.10%

The projected NRPD, CPD and profit fall within the group range and are considered reasonable. The overall profitability appears achievable.

Staffing:

Section 400.23(3)(a)(1), Florida Statutes, specifies a minimum certified nursing assistant staffing of 2.5 hours of direct care per resident per day and a minimum licensed nursing staffing of 1.0 hour of direct resident care per resident day. Based on the information provided in Schedule 6, the applicant meets this requirement.

Conclusion:

This project appears to be financially feasible based on the projections provided by the applicant.

- e. **Will the proposed project foster competition to promote quality and cost-effectiveness? ss. 408.035 (1)(e) and (g), Florida Statutes.**

The following response applies to both PruittHealth-Hillsborough County, LLC (CON application #10509 and #10509P) as well as Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510)

Analysis:

Strictly from a financial perspective, the type of competition that would result in increased efficiencies, service, and quality is limited in health care. Cost-effectiveness through competition is typically achieved via a combination of competitive pricing that forces more efficient cost to remain profitable and offering higher quality and additional services to attract patients from competitors. Since Medicare and Medicaid are the primary payers in the nursing home industry, price-based competition is limited. With a large portion of the revenue stream essentially fixed on a per patient basis, the available margin to increase quality and offer

additional services is limited. In addition, competitive forces truly do not begin to take shape until existing business' market share is threatened. The publication of need in this area suggests that there is an unmet and untapped customer base for a new entrant to absorb. Since nursing home services are limited to available beds and the need formula suggest excess capacity in the market to fill those beds, the impact on market share would be limited. The combination of the existing health care system's barrier to price-based competition via fixed price payers and the existence of unmet need in the district limits any significant gains in cost-effectiveness and quality that would be generated from competition.

Conclusion:

These projects are not likely to have a material impact on competition to promote quality and cost-effectiveness.

- f. Are the proposed costs and methods of construction reasonable? Do they comply with statutory and rule requirements? ss. 408.035 (1) (h), Florida Statutes; Ch. 59A-4, Florida Administrative Code.**

The plans submitted with these applications were schematic in detail with the expectation that they will be necessarily revised and refined prior to being submitted for full plan review. The architectural review of this application shall not be construed as an in-depth effort to determine complete compliance with all applicable codes and standards. The final responsibility for facility compliance ultimately rests with the applicant. Approval from the Agency for Health Care Administration's Office of Plans and Construction is required before the commencement of any construction involving a hospital, nursing home, or intermediate care facility for the developmentally disabled (ICF/DD).

PruittHealth-Hillsborough County, LLC (CON application #10509) has submitted all information and documentation necessary to demonstrate compliance with the architectural review criteria. The cost estimate for the proposed project provided in Schedule 9, Table A and the project completion forecast provided in Schedule 10 appear to be reasonable. A review of the architectural plans, narratives and other supporting documents did not reveal any deficiencies that are likely to have a significant impact on either construction costs or the proposed completion schedule.

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510) has submitted all information and documentation necessary to demonstrate compliance with the architectural review criteria. The cost estimate for the proposed project provided in Schedule 9, Table A and the project completion forecast provided in Schedule 10 appear to be reasonable. A review of the

CON Action Numbers: 10509 and 10510

architectural plans, narratives and other supporting documents did not reveal any deficiencies that are likely to have a significant impact on either construction costs or the proposed completion schedule.

- g. Does the applicant have a history of and propose the provision of health services to Medicaid patients and the medically indigent? Does the applicant propose to provide health services to Medicaid patients and the medically indigent? ss. 408.035 (1) (i), Florida Statutes.**

The five-year Medicaid occupancy for Hillsborough County, District 6 and the State of Florida is provided in the following table:

Medicaid Patient Days and Occupancy in Hillsborough County, District 6 and Florida					
Fiscal Year					
Medicaid Patient Days					
Region	FY 12/13	FY 13/14	FY 14/15	FY 15/16	FY 16/17
Hillsborough County	736,126	712,407	694,243	700,487	702,563
District 6	1,688,023	1,668,849	1,659,397	1,667,627	1,668,200
Florida	15,676,855	15,837,261	15,875,092	16,097,612	16,077,665
Medicaid Occupancy					
Region	FY 12/13	FY 13/14	FY 14/15	FY 15/16	FY 16/17
Hillsborough County	59.39%	59.52%	58.76%	59.78%	59.59%
District 6	59.24%	59.52%	59.63%	60.33%	60.38%
Florida	61.58%	62.05%	61.88%	62.73%	63.34%

Source: Florida Nursing Home Bed Need Projections by District and Subdistrict, October 2013 - 2017 Batching Cycle

PruittHealth-Hillsborough County, LLC (CON application #10509)

The applicant is a newly formed entity and therefore does not have a historical Medicaid record to discuss for this application, the historical Medicaid provision of an affiliate facility operated by the applicant’s parent company is included below:

PruittHealth-Santa Rosa Five-Year Medicaid Occupancy					
	FY	FY	FY	FY	FY
	12/13	13/14	14/15	15/16	16/17
Medicaid Patient Days	24,236	27,529	27,495	29,074	28,172
Medicaid Percent of Patient Days	59.09%	67.62%	67.76%	69.24%	67.82%

Source: Florida Nursing Home Bed Need Projections by District and Subdistrict, October 2013 - 2017 Batching Cycle

The applicant provides a table of PruittHealth affiliated facilities historical provision of Medicaid care as a percentage of total patient days for CY 2014 to the 12-months ending October 31, 2017. The table is reproduced below:

CON Action Numbers: 10509 and 10510

PruittHealth Affiliated Facilities Historical Commitment to Medicaid Patients (Medicaid Percent of Total Patient Days)				
	CY 2014	CY 2015	CY 2016	12 Mos. Ending 10/31/2017
Patient Days	2,143,023	2,180,936	2,240,549	2,230,836
Percent of Patient Days	64.8%	64.1%	64.8%	63.1%

Source: CON application #10509, page 171

The applicant states that PruittHealth will place a concerted emphasis on enhancing access for the defined population and quality of care for lower income persons, disadvantaged persons and the elderly. PruittHealth provides the following payer forecasts for the first two years of operation for the 105-bed proposal and 84-bed partial project:

PruittHealth - Hillsborough, LLC Forecasted Payer Mix: 105 beds		
Payer Group	Year One	Year Two
Self-Pay	699	730
Medicaid	8,755	23,360
Medicare	4,148	10,768
Medicare HMO	367	730
Other Payers - VA	367	730
Total	14,336	36,318
Percentages		
Self-Pay	4.9%	2.0%
Medicaid	61.1%	64.3%
Medicare	28.9%	29.6%
Medicare HMO	2.6%	2.0%
Other Payers - VA	2.6%	2.0%
Total	100.0%	100.0%

Source: CON application #10509, Schedule 7. Years one and two correspond with the years ending on December 31, 2021 and December 31, 2022.

CON Action Numbers: 10509 and 10510

PruittHealth - Hillsborough, LLC Forecasted Payer Mix: 84 - beds		
Payer Group	Year One	Year Two
Self Pay	699	730
Medicaid	6,979	18,250
Medicare	3,337	9,125
Medicare HMO	367	730
Other Payers - VA	367	730
Total	11,749	29,565
Percentages		
Self Pay	5.9%	2.5%
Medicaid	59.4%	61.7%
Medicare	28.4%	30.9%
Medicare HMO	3.1%	2.5%
Other Payers - VA	3.1%	2.0%
Total	100.0%	100.0%

Source: CON application #10509, Schedule 7. Years one and two correspond with the years ending on December 31, 2021 and December 31, 2022. Shaded value should be 2.5 percent.

For the 105-bed proposal, the applicant forecasts that self-pay will account for 4.9 percent in year one and 2.0 percent in year two. Medicaid is expected to account for 61.1 percent in year one and 64.3 percent in year two.

For the 84-bed proposal, the applicant forecasts that self-pay will account for 5.9 percent in year one and 2.5 percent in year two. Medicaid is expected to account for 59.4 percent in year one and 61.7 percent in year two.

PHH states that financial projections included in the CON application demonstrate that the applicant is committed to serving the Medicaid population upon licensure. The applicant references the PruittHealth admission policy which mandates that the facility will not discriminate against anyone on the basis of race, sex, religion, national origin, physical handicap, diagnosis, payment source and/or any other circumstance or physical condition which classifies an individual as underserved. For this reason, the applicant states that its commitment is demonstrated to serve the medically indigent population of the service area.

The applicant does not condition the CON proposal to the provision of a minimum level of Medicaid or charity care.

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510) the reviewer provides the most recent Medicaid provision history for CCHC facilities below:

CON Action Numbers: 10509 and 10510

Clear Choice Operated Facilities, Florida Medicaid Occupancy July 2016 - June 2017		
Facility	Medicaid Patient Days	Medicaid Occupancy
Belleair Health Care Center	19,314	46.85%
Centre Pointe Health & Rehab Center	15,763	37.81%
Conway Lakes Health & Rehab Center	12,459	31.09%
East Bay Rehabilitation Center	22,072	53.02%
Melbourne Terrace Rehabilitation Center	16,329	36.35%
Port Charlotte Rehabilitation Center	18,833	44.09%
Spring Lake Rehabilitation Center	11,055	26.32%
Sun Terrace Health Care Center	12,383	34.03%

Source: Florida Nursing Home Bed Need Projections by District and Subdistrict, October 2017 Batching Cycle

STHCC indicates that CCHC provides care on a non-discriminatory basis accepting all SNF-appropriate patient referrals without regard to race, religion, national origin, age, disability, marital status or source of payment.

The applicant indicates that it meets the needs of the community through community give-back programs and unreimbursed care to Medicaid and medically indigent residents. CON application #10510 is conditioned to the provision of \$150,000 in total annual community give-back programs. CCHC anticipates to provide \$1,200,000 in unreimbursed care to Medicaid and medically indigent residents.

STHCC provides the following payer-mix forecast for the proposal for the first two years of operations:

Sun City Center Associates, LTD (L.P.) Forecasted Payer Mix: First Two Years of Operations		
Payer Group	Year One	Year Two
Self-Pay	912	1,064
Medicaid HMO	2,167	2,306
Medicare	2,955	3,252
Other Managed Care	412	473
Other Payers	294	355
Total	6,741	7,449
Percentages		
Self-Pay	13.5%	14.3%
Medicaid HMO	32.1%	31.0%
Medicare	43.8%	43.6%
Other Managed Care	6.1%	6.3%
Other Payers	4.4%	4.8%
Total	100.0%	100.0%

Source: CON application #10510, Schedule 7. Years one and two correspond to the years ending on December 31, 2019 and December 31, 2020.

The applicant provides the following Medicaid forecast:

CON Action Numbers: 10509 and 10510

SCCA Forecasted Medicaid Provision: Years 1 and 2		
Medicaid Patient Type (Description)	% of Patient Days	
	Project Year One	Project Year Two
"Residential Medicaid"	32.0%	31.0%
"Community/Skilled" Dual-Eligible Medicaid	4.0%	4.0%
Total Medicaid % of Patient Days	36.0%	35.0%

Source: CON application #10510, page 59

STHCC forecasts that self-pay will account for 13.5 percent of patient days in year one and 14.3 percent of patient days in year two. The applicant also forecasts Medicaid HMO to account for 32.1 percent of patient days in year one and 31.0 percent of patient days in year two.

The applicant does not condition the CON proposal to a minimum provision of Medicaid or charity care.

F. SUMMARY

PruittHealth-Hillsborough County, LLC (CON application #10509) proposes to establish a new 105-bed SNF or alternatively, a partial award of a new 84-bed SNF. The proposal is anticipated to fulfill a gap in services for Medicaid long-term care enrollees in addition to enhancing the availability and accessibility of long-term care beds in Hillsborough County. The applicant is an affiliate of PruittHealth which provides SNF care in Santa Rosa County, Florida and operates PruittHealth-Santa Rosa, a community nursing home facility of 120 beds.

For the 105-bed proposal, the proposed project includes 79,587 GSF of construction which consists solely of new construction. The construction cost is \$13,131,855. The total project cost is \$22,975,320. The total project cost includes land, building, equipment, project development, financing and start-up costs.

For the 84-bed partial proposal, the proposed project includes 70,184 GSF of construction which also only consists of new construction. The construction cost is \$11,580,360. The total project cost is \$21,104,618. The total project cost includes land, building, equipment, project development, financing and start-up costs.

The applicant expects issuance of licensure in November 2020 and initiation of service in January 2021 for both proposals (CON application #10509, Schedule 10).

CON Action Numbers: 10509 and 10510

PHH conditions approval of the proposal to eleven (11*) Schedule C conditions. *One condition is excluded due to the provisions of Section 408.043 (4) Florida Statutes.

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510) is an existing provider proposing to add 21 beds to its existing campus in Subdistrict 6-1, Hillsborough County. The proposed project is expected to benefit the existing facility by allowing the applicant to continue to provide specialized high-intensity rehabilitative services to the residents of Sun Towers Retirement Community who have need for long or short-term skilled nursing care.

The proposed project includes 5,911 GSF of renovation and \$16,800 in renovation cost. The total project cost is \$220,000. The total project cost includes land, building, equipment and project development costs.

The applicant expects issuance of licensure and initiation of service in December 2018.

STHCC has conditioned approval of the proposal to three conditions.

Need

In Volume 43, Number 189 of the Florida Administrative Register dated September 29, 2017, need for 105 community nursing home beds was published in the fixed need pool for Subdistrict 6-1 for the July 2020 Planning Horizon.

As of the application deadline for the October 2017 Other Beds & Programs Batching Cycle, November 15, 2017, one existing provider in Subdistrict 6-1 filed an exemption request to add 16 community nursing home beds through the conversion of 16 sheltered nursing home beds (E170028 – John Knox Village Medical Center). Subdistrict 6-1 had an occupancy of 86.04 percent for the 12-month period ending on June 30, 2017. There were 3,704 licensed community nursing home beds within Subdistrict 6-1 for this period.

PruittHealth-Hillsborough County, LLC (CON application #10509) states that the proposal is needed as evidenced by historical occupancy rates of existing providers, less access to nursing home beds for the Medicaid long-term care population, historical population discharges to nursing homes by service line, the growing elderly population who are the most frequent users of nursing home services and the changing dynamics in payers and the payer system. The applicant maintains that PruittHealth will use its knowledge of the market and grow burgeoning

CON Action Numbers: 10509 and 10510

relationships with local health care providers to effectively respond to the unique needs of the market. PHH expects for the program to enhance the availability, accessibility and quality of nursing home services provided to residents of the service area while reducing admissions to the area hospitals.

PruittHealth expects for the proposal to result in the following outcomes:

- Improve access for persons in need of long-term care
- Improve access to Medicaid services
- Improve access for bariatric patients
- Improve access for persons in need of short-term rehab
- Improve access of Medicare services
- Improve access to private rooms, especially for Medicaid payers
- Provide a modern design that supports independence and choice
- Provide state-of-the-art rehabilitation programming
- Provide extensive clinical programming focused on reducing hospital readmissions

The applicant also anticipates that the proposal(s) should be approved for the following reasons:

- 100 percent private rooms
- Two bariatric rooms/suites
- 64 percent of patient days to Medicaid Long Term Care enrollees
- State of the art rehab suite, extensively equipped to include a Hydroworx therapy pool
- Programs to reduce readmissions that have already been successfully introduced in other PruittHealth facilities
- A commitment to technology, including PoiontRight, Smart Charting, Wanderguard, Careguard and electronic medical records

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510) indicates that the proposed project is best positioned to address the community needs of residents in Hillsborough County as demonstrated by the following:

- An experienced, local community nursing home management team, with headquarters and a training facility in Florida that will establish and operate the proposed project. This management team is innovative and continues to “raise the bar” on SNF facilities in Florida, as illustrated by the following:
 - Innovative program offerings, illustrated by university-based intergenerational programs, services and activities available to residents.
 - Ever-improving facility design based on resident and families’ needs and expectations for an active life experience and activity-focused community.

CON Action Numbers: 10509 and 10510

- Implementation of Agency-approved projects as proposed on-schedule.
- Recognition that financial viability for SNFs in the short – and long-term, is typically best achieved with minimum-sized 100-bed facility due to the economies of scale and efficiencies gained.
- Comprehensive continuity of care provided for SNF residents, including the sub-acute level of high-intensity rehabilitative services, provided by certified clinical staff using advanced equipment and facilities to ensure optimal patient outcomes and recovery. Specifics include:
 - Specialized and high-intensity rehabilitative programs and services available for all residents.
 - Advanced rehabilitative equipment necessary for high-intensity rehabilitative care.
 - Certified staff members ensure high quality, specialized rehabilitative services are provided.
 - Low hospital readmission rates document success of sub-acute services.
 - Sub-acute SNF services are a critical component in the continuity of care.
 - The project will address a growing need for advanced rehabilitative services in Hillsborough County.
- Design and management of the facility by a community-focused organization that tailors its facility, programs and services as well as community giveback programs to the local communities' needs –all with the goals of ensuring resident choice, independence and dignity.
- The proven programs and services to be provided will ensure that the highest quality nursing home services are available to the residents in Hillsborough County, evidenced by three Governor's Gold Seal facilities and six facilities with four or five-star rankings based on the Centers for Medicare and Medicare Services national standards.

The Agency has determined that within the context of the criteria specified Section 408.035 (1), F.S., and Rule 59C-1.036, F.A.C., the partial request by CON application #10509 and the proposed request by CON application #10510 best satisfy the criteria including the extent to which the proposed service will enhance access to health care to residents of the service district.

Quality of Care

Both applicants demonstrated the ability to provide quality of care.

PruittHealth-Hillsborough County, LLC (CON application #10509)

is a newly formed entity and therefore does not have a historical record available to document in this certificate of need proposal. The applicant states that implementation of this proposal will involve the development of all quality policies and procedures and a quality assurance program based on its other PruittHealth affiliated facilities nationally. PHH expresses a commitment to adhere to any and all state and federal nursing home regulations and statutes in addition to Medicare's Conditions of Participation.

PruittHealth maintains that its organizational experience and expertise in providing quality skilled nursing services is evidenced by the number of successful programs and quality assurance practices. The applicant describes how the proposed program will consist of assigned patient care managers, a care transition program, corporate standards, leadership and training, external benchmarking and awards, continuous process improvement, customer service and transparency. PHH discusses the use of external benchmarking, the ABAQIS quality indicator program, internal reports, internal benchmarking tools like the LTC TrendTracker and a PIP as a part of its quality assurance process that will be among several measures implemented as a part of the proposal.

PruittHealth currently operates PruittHealth – Santa Rosa in Santa Rosa County (Subdistrict 1-1). Agency records indicate that for the three-year period between December 27, 2014 and December 27, 2017, the provider had three substantiated Complaints.

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510)

as an existing provider the applicant provides descriptions of its documented quality history, measures and distinctions at existing facilities along with policies and procedures to be implemented with the addition of the proposal. Based on its historical performance on CMS and Agency rating systems and existing programs and services, the applicant identifies as a quality provider best positioned to address the bed need within the service area as evidenced through high-quality post-acute care program and services, including high-intensity rehabilitative services and specialized equipment that will be provided in a uniquely designed facility managed by a local, experienced management team.

Agency records indicate that for the three-year period between December 27, 2014 and December 27, 2017, Sun Terrace Health Care Center had three substantiated complaints. Agency records indicate that for the three-year period between December 27, 2014 and December 27, 2017 facilities operated by CCHC had 20 substantiated complaints.

Financial Feasibility/Availability of Funds

PruittHealth-Hillsborough County, LLC (CON application #10509)

- Funding for this project is in question.
- This project appears to be financially feasible based on the projections provided by the applicant.
- This project is not likely to have a material impact on competition to promote quality and cost-effectiveness strictly based on the financial schedules.
- Based on the information provided in Schedule 6, the applicant's projected nursing staffing meets the statutory requirement.

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510)

- Funding for this project is uncertain.
- This project appears to be financially feasible based on the projections provided by the applicant.
- This project is not likely to have a material impact on competition to promote quality and cost effectiveness strictly based on the financial schedules.
- Based on the information provided in Schedule 6, the applicant's projected nursing staffing meets the statutory requirement.

Medicaid/Charity Care

PruittHealth-Hillsborough County, LLC (CON application #10509)

is a newly formed entity and therefore does not have a historical record of Medicaid provision available to discuss for this application.

For the 105-bed proposal, the applicant forecasts that self-pay will account for 4.9 percent in year one and 2.0 percent in year two. Medicaid is expected to account for 61.1 percent in year one and 64.3 percent in year two.

For the 84-bed proposal, the applicant forecasts that self-pay will account for 5.9 percent in year one and 2.5 percent in year two. Medicaid is expected to account for 59.4 percent in year one and 61.7 percent in year two.

The applicant does not condition the CON proposal to the provision of a minimum level of Medicaid or charity care.

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510) forecasts that self-pay will account for 13.5 percent of patient days in year one and 14.3 percent of patient days in year two. Medicaid HMO is expected to account for 32.1 percent of patient days in year one and 31.0 percent of patient days in year two.

The applicant does not condition the CON proposal to a minimum provision of Medicaid or charity care.

Architectural:

PruittHealth-Hillsborough County, LLC (CON application #10509):

The cost estimate for the proposed project provided in Schedule 9, Table A and the project completion forecast provided in Schedule 10 appear to be reasonable. A review of the architectural plans, narratives and other supporting documents did not reveal any deficiencies that are likely to have a significant impact on either construction costs or the proposed completion schedule.

Sun City Center Associates, LTD (L.P.) d/b/a Sun Terrace Health Care Center (CON application #10510):

The cost estimate for the proposed project provided in Schedule 9, Table A and the project completion forecast provided in Schedule 10 appear to be reasonable. A review of the architectural plans, narratives and other supporting documents did not reveal any deficiencies that are likely to have a significant impact on either construction costs or the proposed completion schedule.

G. RECOMMENDATION

Approve CON #10509P to establish an 84-bed community nursing home. The total project cost is \$21,104,618. The project includes 70,184 GSF of new construction and a construction cost of \$11,580,360.

CONDITIONS:

- Location:
 - Hillsborough County, Subdistrict 6-1, Florida
- Programming/Operational Conditions:
 - Seek Joint Commission accreditation or accreditation from some other similarly recognized accrediting body

CON Action Numbers: 10509 and 10510

- Implement a program designed to reduce hospital re-admissions; the current program utilized by PruittHealth affiliated facilities is INTERACT 3.0. The program to be implemented will be this program or other similarly designed program based on the most recent quality driven program PruittHealth determines to be available at the time of implementation.
- Include two bariatric rooms in the facility design
- Participate in an organization-wide Quality Assurance/ Performance Improvement initiative that entails quarterly visits in regard to clinical, operational, pharmaceutical and reimbursement areas by corporate consultants to ensure compliance with all local, state and federal laws
- Implement Electronic Medical Records (EMR) at the facility, and include Smart Charting or other similar bed side patient charting tool
- Implement Resident Safety Technology including Call Guard and WanderGuard into the facility
- Implement Clinical Kiosks in appropriate locations throughout the facility
- Assure all staff maintains ongoing training and continuing education credits utilizing Pruitt University and at no cost to the employees
- Participate in a company-wide Annual Quality Report to demonstrate transparency in operations and make this Quality Report available to the public
- Adopt the PruittHealth patient model of care including the applicable PerfectPath Programs appropriate for this facility and described in the CON application and Supporting Documents
- Implement PointRight Technology (or a future similar technology) in the ongoing operations

Approve CON #10510 to add 21 community nursing home beds. The total project cost is \$220,000. The project includes 5,911 GSF of renovation construction and \$16,800 of renovation construction cost.

CONDITIONS:

The applicant will provide an array of unique high-intensity sub-acute rehabilitative programs and services for residents in its nursing home, including the following:

- Lee Silverman Voice Treatment (LSVT) Loud Program
- Lee Silverman Voice Treatment (LSVT) BIG Program
- Infusion therapy services including:
 - Peritoneal Dialysis
 - Total Peritoneal Nutrition

CON Action Numbers: 10509 and 10510

- Aquatic therapy, through development of two hydrotherapy pools
- Rehabilitative therapy for patients unable to perform 100 percent weight-bearing ambulation, through purchase and use of an anti-gravity treadmill
- Rehabilitative therapy for patients who would benefit from compressed-air equipment designed specifically for the aging population, through purchase and use of HUR Equipment and/or specialized equipment
- Sunshine/Wellness Check Program
- Home Assessments:
 - A medication reconciliation
 - Rehabilitation Therapy Team Assessment, as appropriate
- Transportation Program to transport outpatients from their home environment to therapy sessions when medically necessary. This same transportation program will be utilized for long-term residents' family members without the means to travel to see his/her loved one in the nursing home, as needed

The applicant will ensure highly skilled clinic staff members provide care to residents in its nursing home, evidenced by special training and/or certification as follows:

- Lee Silverman Voice Treatment (LSVT) Loud Certified
- Lee Silverman Voice Treatment (LSVT) BIG Certified
- Aquatic Therapy Certification
- Certified Stroke Rehabilitation Specialist (CSRS)
- Lymphedema Certification
- Vital Stim Therapy Certification
- Neurodevelopmental Treatment (NDT) Certification

Community Give-Back Programs: Annual funding at least \$150,000

The applicant commits to a total annual Community Give-Back Programs amount of at least \$150,000 comprised of the following components

- Unreimbursed indigent/charity care provided to patients requiring services at its facility
- Donations of goods, services, and/or direct funding to local charities selected by residents
- Scholarship programs, which pay the costs of staff members to enroll in academic programs to further their formal education

Deny CON #10509.

AUTHORIZATION FOR AGENCY ACTION

Authorized representatives of the Agency for Health Care Administration adopted the recommendation contained herein and released the State Agency Action Report.

DATE: _____

Marisol Fitch
Health Administration Services Manager
Certificate of Need