

PUBLIC HEARING REPORT

PROJECT: 10-032 WARRIOR'S GATEWAY, ROCKFORD, IL

DATE: JULY 30, 2010

PLACE: ROCKFORD CITY COUNCIL CHAMBERS
425 STATE STREET, 2ND FLOOR
ROCKFORD, ILLINOIS 61104

TIME: 10:00 A.M.

PUBLIC HEARING OFFICER
ILLINOIS DEPARTMENT OF PUBLIC HEALTH

- KAREN HALL

28 INDIVIDUALS WERE IN ATTENDANCE

7 INDIVIDUALS TESTIFIED IN OPPOSITION

9 INDIVIDUALS TESTIFIED IN SUPPORT

RECEIVED

AUG 02 2010

HEALTH FACILITIES &
SERVICES REVIEW BOARD

191

Illinois Health Facilities Planning Board
PUBLIC HEARING REGISTER

Site: Rockford City Council
Chambers, 2nd Fl.

PROJECT #10-032

Date: July 30, 2010

Address: 425 E. State Street

NAME: Warrior's Gateway

Time: 1:30 p.m.

ATTENDANCE/NO TESTIMONY ON PROJECT

#	NAME (Please Print)	AGENCY, ORGANIZATION OR INSTITUTION REPRESENTED (PLEASE PRINT)	CITY (Please Print)	ORAL, WRITTEN OR BOTH (PLEASE PRINT)
1	Melissa Westphal	Rockford Register Star	Rockford	Media/No Comment
2	Jim Staudisit	ROBEWA St. Anne Center	Rockford	N/A
3	Ashley O. Davis	5362 YERLUSTOWE DR	ROCKFORD	N/A
4	Phil Dean	330 Spruce Creek Rd.	Rockford	N/A
5	Michelle Riman, St	ROSEWOOD CARE CENTER	Rockford	N/A
6	T. Ryan Fitzgerald	330 Spring Creek Rd	Rockford	N/A
7	Dorene Beck	350 Spruce Creek Rd.	Rockford	N/A
8	Lorraine Williams	FD 3308 Trucking	Rockford	N/A
9	Lloyd Frey			
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Illinois Health Facilities Planning Board
PUBLIC HEARING REGISTER

Site: Rockford City Council
Chambers, 2nd Fl.

PROJECT #10-032

Date: July 30, 2010

Address: 425 E. State Street

NAME: Warrior's Gateway

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TESTIMONY TO SUPPORT PROJECT

#	NAME (Please Print)	AGENCY, ORGANIZATION OR INSTITUTION REPRESENTED (PLEASE PRINT)	CITY (Please Print)	ORAL, WRITTEN OR BOTH (PLEASE PRINT)
✓ 1	Sherie Scott	Boh Angel's Concord Commons	Rockford	oral
✓ 2	Marshall Starks	The Matrix Consulting Gr.	Rockford	written
✓ 3	THOMAS MORRISSEY	TRANSITIONAL LIVING SERVICES	WOODSTOCK, IL	Both
✓ 4	Alain BELIERE	Transitional Living Services	Woodstock, IL	Both
✓ 5	Christopher J. Dials	Revere Healthcare Ltd	Carly IL	Oral
✓ 6	Sharon E. Spang	Parsonal Vt - VET	Rockford IL	?
✓ 7	Aleandra Jener	Home Capital Mktg	Rockford IL	?
✓ 8	Ruth Gully	Linda McKnelly	Rockford, IL	Callor
✓ 9	Kalonne Williams	T-Dub Trucking	Rockford	oral
✓ 10	LINDA McNEELEY	ALDERMAN 13th WARD	Rockford	ORAL
11				
12				
13				
14				
15				

107-1

Illinois Health Facilities Planning Board
PUBLIC HEARING REGISTER

PROJECT #10-032

Date: July 30, 2010

Site: Rockford City Council
Chambers, 2nd Fl.

NAME: Warrior's Gateway

Time: 1:30 p.m..

Address: 425 E. State Street

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TESTIMONY TO OPPOSE PROJECT

#	NAME (Please Print)	AGENCY, ORGANIZATION OR INSTITUTION REPRESENTED (PLEASE PRINT)	CITY (Please Print)	ORAL, WRITTEN OR BOTH (PLEASE PRINT)
✓ 1	Gordon Oksnevad	Alyne Fireside	Rockford	Oral
✓ 2	Holger Oksnevad	Madina Nursing Cent. P.	Durand	Both
✓ 3	Ann MURZIANO	PAVIEW D. P.	Rockford	oral
✓ 4	Janelle Charlewick	Provena	Rockford	Both Written
✓ 5	Bar Becker	Rosewood	Rockford	Both
✓ 6	Michelle Almqvist	Rosewood	Rockford	Both
7	Jean Ross	St. Joseph's	Rockford	Both
✓ 8	Joli Kocht	St. Joseph's	Rockford	both
9	Jane Smith	St. Joseph's	Rockford	Both
10				
11				
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14				

Health Facilities and Service Review Board Certificate of Need Application

July 31, 2010

Good afternoon. My name is Alan Belcher, A-L-A-N- B- E-L-C-H-E-R. I am the Executive Director of Transitional Living Services. I would like to thank the Health Facilities and Services Review Board for the opportunity to provide information and to explain why TLS is seeking a certificate of need for Warriors' Gateway.

Transitional Living Services is a not-for-profit 501 (c) 3 agency that serves disabled and disadvantaged veterans and their families. TLS presently serves veterans in Lake, McHenry, northern Cook and Kane Counties. We own and operate a residential facility--located in Hebron, IL and funded through the U.S. Department of Veterans Affairs--for homeless veterans. TLS recently received second-year funding from the U.S. Department of Labor to provide employment counseling and related services to at-risk veterans. TLS has a history of providing services over a large geographic area and to a challenging population.

Warriors' Gateway, a proposed long-term rehabilitation center targeting veterans with severe injury but open to all, will be one of three facilities built on the Rockford Campus of Care. The campus will consist of Warriors' Gateway, an autism center, as well as an assisted living center for dementia related issues. The three non-for-profits will form a common board of directors and hire one firm to manage all three programs. The capacity to deliver health care cost savings is created by the strategic combination of the three brain-related treatment facilities, the concentration of the three brain-related facilities provides significant opportunity for the community to care for these special populations. The concentration of these populations serves to attract the best

psych/social service professionals as well as advanced training for medical and nursing students.

TLS maintains a strong commitment to veterans. We have a history of identifying unmet needs and finding the resources to address those needs. The need addressed in the application before you was first identified in March of 2007 in a meeting with representatives of the Veterans Administration and community partners who all shared the concern and recognized the need for long term care of veterans who have suffered from polytraumas and who, after acute care hospitalization, need extensive rehabilitation.

Warriors' Gateway will not be a geriatric nursing home. Warriors' Gateway will provide community based residential care to people who can benefit from state of the art rehabilitation. The facility will not be limited to veterans. TLS anticipates that many of the referrals will be from Winnebago and the surrounding area. One of the ancillary benefits of this program is the service beyond the veteran community. TLS has estimated that Warriors' Gateway will serve 36 veterans at any one time.

A point-in-time survey conducted by the VA identified 35 veterans who could utilize a long-term rehabilitation facility. The 35 veterans were residents of the four Chicago/Milwaukee area VA hospitals.

While we believe that this estimate is significantly lower than what the actual number will be, it has been difficult to obtain accurate data. Furthermore, we estimate that the need for long-term care rehabilitation is so great that our facility could be filled without veterans.

Approximately, 3.17 million Americans are estimated to have suffered traumatic brain injuries while an additional 1.4 million

Americans sustain traumatic brain injuries each year according to the Center for Disease Control. Approximately 70,000 individuals experience permanent brain damage. TLS will, through its Warriors' Gateway program, provide services to a small portion of this extensive population.

TLS will work closely with other community based providers.

Our agreement with the Veterans Administration is to work closely on behalf of the veterans we are both committed to care for. We have no contract or agreement as to the number of veterans that will be referred to Warriors' Gateway from the VA. Jean Bromley, the Operation Iraqi Freedom/Operation Enduring Freedom Program Manager at Milwaukee VA Hospital has been designated as our point of contact for the V.A. TLS believes that working together we will have a productive relationship which will eventuate in Warriors' Gateway serving veterans for years to come.

While TLS does not own nor does it operate a long term care rehabilitation facility such as Warriors' Gateway, we will be contracting with Revere Health Care to manage Warriors' Gateway. Revere is a management company with extensive experience in the field.

It is our plan to provide a complete range of neuro-rehabilitation services to individual with acquired brain injury, spinal cord injuries, traumatic brain injuries and other neurological impairments. Services will be available for both the skilled nursing resident as well as the supportive living residents. We will provide on-site services such as licensed physical therapy, speech therapy, occupational therapy, psychological therapy and recreational therapy. We also plan to contract with community provides for services which are not profitable to provide on site.

TLS will emphasize the involvement of the family in the residents programs and the participation of the family whenever possible. We believe that the care and recovery of the resident is positively impacted and has a direct correlation to the involvement of the family.

We anticipate securing CARF accreditation as soon as possible. CARF is the leading international accreditation organization for rehabilitation providers. All professional staff will be licensed and receive ongoing training. It is the commitment of TLS to insure that all residents receive state of the art, compassionate and quality care.

TLS is also making application for supportive living units. THE 85 units will be available for individuals who are unable to return home to independent living. Residents will have the availability of the programming offered through the skilled care rehabilitation as well as the community based resources. Our supportive living facility will also offer a comprehensive selection of activities offered to provide opportunities to individuals with acquired brain injuries. The goal of supportive living is the same as skilled rehabilitation: to assist every resident to reach his or her optimum level of functioning and to help him/her maintain that function.

TLS believes that it is vital to integrate residents into the community through vocational and recreational endeavors. We will provide vocational training which will be conducted on site as well as in the community. Recreational activities will compliment both the vocational training and the resident's physical and psychological rehabilitation. Therapeutic horseback riding, fishing from a handicapped accessible pontoon boat as well as trips to a disabled veterans camp in Washington County, Minnesota are a few of the recreational opportunities that will be available.

Transitional Living Services respectfully requests that the Health Facilities and Services Review Board approve our application for a certificate of need. We commit to the creation of a rehabilitation program which will provide the highest quality of care to our nation's veterans and to those in our community in need.

Alan Belcher, MS
Executive Director
Transitional Living Services
645 McHenry Avenue
Woodstock, IL 60098

July 30, 2010

Health Facilities Planning Board

Re: Warrior's Gateway, Rockford

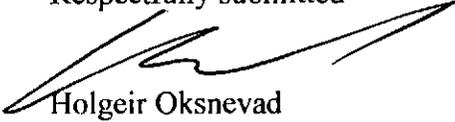
My name is Holgeir Oksnevad administrator/owner of Medina Nursing Center. I am speaking in opposition of the proposed Warrior's Gateway. Attached (see attached #1) is data from 2005 data on bed use in Winnebago County. I've also updated the information with 2008 data from Health Facilities Planning Board web sit. It is showing that the occupancy rate is declining. Winnebago County has 2336 licensed beds, 79.1% occupancy in 2005, and in 2008 with the same licensed beds has an occupancy rate of 78.9%.

Page 99 of the application (see attached #2) – 1110.1730(b)(2) Service to Planning Area Residents – states “two thirds of patients will originate from Winnebago County”. Take the letter from the Department of Veterans Affairs stating “it appears unlikely that there would be adequate Veteran demand to support the proposed 120 bed facility in the Rockford area”, and what you done is add 120 licensed beds in Rockford serving the Winnebago area and no veterans and providing the same services that we already are providing! This would bring the occupancy further down in Winnebago County, bringing the total of unused beds from 543 in 2008 to 663 vacant licensed beds each and every day in Winnebago County! Occupancy rate from 2008 of 78% to 73%.

Page 218 of the application (see attached #3) – 1110.1730(g) Staffing Availability – statement “Professional nursing staff – RNs, LPNs, and CNAs – can be recruited from existing long term care facilities in Rockford”. In Winnebago County which includes Rockford, we all struggle for professional staff. There is even a bigger problem in rural Winnebago County because we have to attract workers from the urban area. There is a great shortage of professional nursing staff, RNs, LPNs, and CNAs period and we would be directly fighting for the same staff from the same area.

I hope I have demonstrated the bed need for Winnebago County is met, in fact are greatly exceeded. To grant another licensed facility would greatly impair the operation of Medina Nursing Center and every nursing home in Rockford without a doubt!

Respectfully submitted



Holgeir Oksnevad
Administrator/Owner
Medina Nursing Center

Attachment #1

Based on 2005 data										
	License	Total beds		Daily used beds	Percent occupied	Total beds		total beds not used yearly	Daily beds unused	
		Used yearly	available yearly			available yearly	beds unused			
Winnebago County										
Alden-Alma Nelson Manor	268	78137	214	79.88%	97820	19683	53.9			
Alden-Park Strathmoor	189	54781	150	79.41%	68985	14204	38.9			
Alpine Fireside Health Center	66	16220	44	67.33%	24090	7870	21.6			
Amberwood Nursing & Rehab	162	25445	70	43.03%	59130	33685	92.3			
Asta Care Centre of Rockford	130	37385	102	78.79%	47450	10065	27.6			
East Bank Center	54	8917	24	45.24%	19710	10793	29.6			
Fair Oaks Rehab & HCC	78	24423	67	85.79%	28470	4047	11.1			
Fairhaven Christian Retirement	96	29401	81	83.91%	35040	5639	15.4			
Fairview Nursing Plaza	213	71252	195	91.65%	77745	6493	17.8			
Medina Nursing Center	89	27776	76	85.50%	32485	4709	12.9			
P.A/ Peterson Center for Health	127	36503	100	78.75%	46355	9852	27.0			
Provena Cor Mariae Center	73	22282	61	83.63%	26645	4363	12.0			
Provena St. Anne Center	179	59679	164	91.34%	65335	5656	15.5			
River Bluff Nursing Home	304	90572	248	81.63%	110960	20388	55.9			
Rosewood Care Center - Rockford	120	34835	95	79.53%	43800	8965	24.6			
Springwood Nursing & Rehab	97	29960	82	84.62%	35405	5445	14.9			
Willows Health Care	91	27317	75	82.24%	33215	5898	16.2			
2005 TOTAL	2336	674885	1849	79.15%	852640	177755	487.0			
2008 data	2336	673028	1793	78.93%	43800	43800	543.0			
Warrior's Gateway, Rockford	120						120.0			
projected total	2456				896440		663.0			

HEALTH SERVICE AREA

001

RESIDENTS BY PAYMENT SOURCE AND LEVEL OF CARE

LEVEL OF CARE	Medicare		Other		Private	Charity	TOTALS
	Medicare	Medicaid	Public	Insurance	Pay	Care	
Nursing Care	277	1,044	4	53	412	3	1,793
Skilled Under 22	0	90	0	0	0	0	90
ICF/DD		176	0	0	1	0	177
Sheltered Care			0	0	317	10	327
TOTALS	277	1,310	4	53	730	13	2,387

AVERAGE DAILY PAYMENT RATES

LEVEL OF CARE	SINGLE	DOUBLE
Nursing Care	215	175
Skilled Under 22	0	179
Intermediate DD	215	159
Shelter	130	98

RESIDENTS BY RACIAL/ETHNICITY GROUPING

RACE	Nursing	SkilUnd22	ICF/DD	Shelter	Totals
Asian	4	1	2	1	8
Amer. Indian	1	0	1	0	2
Black	175	13	30	1	219
Hawaiian/Pac. Isl.	0	0	1	0	1
White	1,609	62	142	322	2,135
Race Unknown	4	14	1	3	22
Total	1,793	90	177	327	2,387

ETHNICITY	Nursing	SkilUnd22	ICF/DD	Shelter	Totals
Hispanic	25	6	7	0	38
Non-Hispanic	1,766	84	169	327	2,346
Ethnicity Unknown	2	0	1	0	3
Total	1,793	90	177	327	2,387

STAFFING

EMPLOYMENT CATEGORY	FULL-TIME EQUIVALENT
Administrators	22.00
Physicians	0.20
Director of Nursing	20.00
Registered Nurses	143.73
LPN's	276.74
Certified Aides	1046.48
Other Health Staff	106.74
Non-Health Staff	823.59
Totals	2439.48

NET REVENUE BY PAYOR SOURCE (Fiscal Year Data)

Medicare	Medicaid	Other Public	Private Insurance	Private Pay	TOTALS	Charity Care Expense	Charity Care Expense as % of Total Net Revenue
24.7%	38.9%	2.3%	5.4%	28.6%	100.0%		0.3%
35,261,718	55,505,953	3,251,470	7,737,511	40,848,458	142,605,116	364,482	

Attachment
#2

1110.1730(b)(2) Service to Planning Area Residents

The project's primary service area incorporates Winnebago County, where the project is physically located. Although the project will serve an area encompassing three VA hospitals, two thirds of patients will originate from Winnebago County.

DEPARTMENT OF VETERANS AFFAIRS
VA Great Lakes Health Care System
Veterans Integrated Service Network 12
5000 South 5th Avenue, Building 18
Hines, IL 60141-3030



June 14, 2010

RECEIVED

JUN 16 2010

HEALTH FACILITIES &
SERVICES REVIEW BOARD

Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

Dear Executive Secretary:

VA Great Lakes Health Care System, Veterans Integrated Service Network 12 (VISN 12) would like to comment on the Warrior's Gateway project application for a new facility in Rockford, IL. In May 2010, Partner's for Caring Development Inc., in collaboration with Revere Healthcare and Transitional Living Services submitted a proposal for a 120 bed facility specializing in Traumatic Brain Injury and Polytrauma services. The primary focus of the facility would be for Veterans returning from Iraq or Afghanistan. VISN 12 would like to provide information on services currently available for this population and potential demand in the targeted area.

VISN 12 is one of 21 service networks administered by the Department of Veterans Affairs through the Veterans Health Administration. VISN 12 is responsible for providing health care services to Veterans in northern Illinois, Wisconsin and the upper peninsula of Michigan. These services are provided through 7 medical centers and 32 community outpatient clinics. A large multispecialty outpatient clinic has been administered by the VA in Rockford, IL for over 25 years.

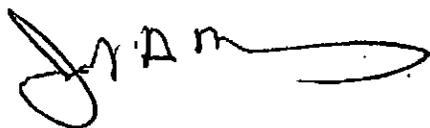
Hines VA Hospital is the designated Polytrauma Network Site for VISN 12. Polytrauma Network Sites provide specialized, post-acute rehabilitation in consultation with VA's Regional Rehabilitation Centers in a setting appropriate to the needs of Veterans, service members, and families. These Network Sites provide proactive case management for existing and emerging conditions and identify local resources for VA and non-VA care. Hines is currently treating 67 polytrauma Veterans as outpatients and historically has had limited need (less than 10 Veterans) for a transitional residential facility. Also, Hines has screened 382 Veterans with positive evaluations for Traumatic Brain Injury (TBI) and 93 of these patients are actively being followed. The majority of patients have mild TBI's that can be effectively treated in home and community based settings, with less than 12 patients in the moderate to severe category that may require more intensive therapy.

The proposed Warrior Gateway facility identifies Winnebago County as the primary service area with two thirds of the residents coming from this county. Currently,

22% of the 22,569 Veterans residing in Winnebago County are under 45 years old and are in the age cohort identified in the proposal. There are 612 Veterans from the Iraq and Afghanistan conflicts that have enrolled with the VA for care from Winnebago, Boone and Stephenson Counties. Although there are no specific demand projections for returning Veterans needing residential polytrauma and/or TBI services, it is expected to continue to be a very small number. VISN 12 has planned construction of a 10 bed extended care facility using the THE GREEN HOUSE® concept targeting younger Veterans. This facility will be located at the North Chicago VAMC and will be the primary location for placement of younger Veterans in need of residential polytrauma and/or TBI services for the entire VISN 12 service area. It appears unlikely that there would be adequate Veteran demand to support the proposed 120 bed facility in the Rockford area.

VISN 12 planning and clinical representatives will continue to work with the Warrior Gateway sponsors and other community partners to identify and implement the best care options for Veterans. Thank you for the opportunity to provide information on this endeavor for your consideration and planning.

Sincerely yours,

A handwritten signature in black ink, appearing to read "J. A. Murawsky". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jeffrey A. Murawsky, M.D.
Network Director

Attachment
#3

1110.1730(g) Staffing Availability

The professional staffing needs of the proposed project are as follows:

Administrator	1.00
Assistant Admin	1.00
RN	14.38
LPN	14.60
CNA	65.79
Rehab Aides	6.53
Nursing admin	3.00
Dietary Supervisor	1.00
Dietary	19.00
Activities	6.00
Laundry	4.00
Housekeeping	8.00
Maintenance	2.00
Social Service	4.00
Clerical	3.50
Total Staffing	153.80

The management company, Revere Healthcare, Ltd. has an Administrator and a Director of Nursing on staff. Professional nursing staff – RNs, LPNs, and CNAs – can be recruited from existing long term care facilities in Rockford, as well as from each of the nursing schools in Rockford. These schools are Saint Anthony College of Nursing, Rock Valley College, UIC Rockford, and Rockford College. Projections from Illinois Department of Employment Security for Winnebago County (attached) show growth in nurse aides of 268 to 1,811 by 2012, and in LPNs by 66 to 681.

The remaining facility staffing needs can be met by the local labor pool in Rockford.

Statement to the Health Facilities and Services Review Board

Good afternoon Mr. Chairman, members of the Review Board and distinguished guests. My name is Thomas M. Morrissey, a retired Sergeant Major. Thank you for hearing my testimony today. I served in uniform for over 30 years with U.S. Army Special Forces and since 911 I deployed to Afghanistan on 3 separate combat tours.

In June 2006, during my last tour, I was caught in an enemy ambush. As a result, I received 8 direct hits from an AK-47 at close range. I sustained significant, physical poly-trauma injuries to all four of my extremities and my upper chest. I'm able to speak to you today because of the superior training, leadership, equipment and medical care provided to me by the U.S. Army.

Medical personnel from an American, forward operating base (FOB) quickly responded to my call for assistance. I was in the air on a medical evacuation flight 45 minutes after the ambush, and into my first surgery within 2 hours. I awoke in the recovery room of an Army field hospital the next day. Within hours I left Afghanistan for Germany where I remained for 5 days and 2 additional surgeries.

Nine days after receiving my wounds I arrived at Eisenhower Army Medical Center (EAMC), Fort Gordon, GA. I was reunited with my family in the emergency room where the medical staff gave us a joint briefing on what to expect. The next morning I began the process of having both my arms rebuilt. My right humerus bone had been shattered and a cadaver bone was implanted as part of the repair. In my left forearm, both my ulna and radius bones were fractured. The nerves in both arms were traumatized so I could not use the arms to do anything. Both of my legs had extensive soft tissue damage and remain peppered with pieces of metal.

Every morning, a procession of doctors would start their rotation through my room at 0600 hours. I was completely dependent on the nursing staff to assist me in all activities of daily life (ADL). This humbles a person even more than the initial realization that one cannot do the simple things we all take for granted. This went on for months.

It took 2-1/2 months of surgeries and general rehabilitation before I was ambulatory and could exit my bed. During that time, secondary complications added to the difficulty of my physical and occupational therapies. Lymphedema, heterotrophic ossification, muscle atrophy, a gangrenous gall bladder and multiple infections caused by the hospital environment made it difficult to establish a regular, effective rehabilitation regimen.

At the end of August 2006, I moved to a one-of-a-kind Veterans Affairs (VA) Active Duty Rehabilitation Unit to further my progress. This unit was designed and funded by the Department of Defense. Prior to leaving EAMC, I met the senior doctor and physician's assistant from the VA rehab unit. They briefed me on the facility, staff and the uniqueness of the unit I was about to become a part of. I quickly realized professionals, filled with compassion for all injured soldiers, staffed the unit at all levels.

My inpatient status at the VA lasted 10 months. During that time I received 4+ hours a day, six days a week, of physical and occupational therapy. Periodically, I transferred back to EAMC for regular doctor reviews and follow-on surgeries. I moved back to EAMC and was integrated into a Warrior Transition Unit (WTC) in July 2007. However, my rehabilitation continued at the VA as an outpatient receiving 2+ hours of therapy a day, five days a week. Even the Army hospital did not have sufficient staff and facilities to deal with my exceptional injuries, nor provide, the aggressive therapy necessary to rehabilitate me most effectively.

Statement to the Health Facilities and Services Review Board

Over the course of three years I received 20 surgeries. On average that was one surgery every 2 months followed by aggressive occupational rehabilitation. Today, I'm able to perform most basic ADLs, but I still have my limitations. In separate reviews, both the Army and the VA found me to be 100% permanently disabled.

My experience is only one of many. Poly-trauma injuries are typical of the warfare we find ourselves engaged in. Long periods of treatment and rehabilitation are the norm, not the exception. In addition to the physical injuries, soldiers and families also endure long periods of separation in many cases. This may create emotional challenges and hinder a soldier's recovery.

Treatment for poly-trauma war wounds is not necessarily the same as civilian activity poly-trauma (falls, car accidents, etc.). In the upper Mid-west there were no facilities judged sufficiently qualified to help me. At the time of my rehabilitation I technically had an option to be treated as part of a Community Based Health Care Organization (CBHCO). In researching the option I found a TriCare supported hospital that would qualify but my rehabilitation would have been 2 hours a day, twice a week. This was nowhere near sufficient to successfully treat my injuries. Thus, I spent 3 long years away from my family to ensure maximum treatment of my injuries and successful recovery.

Today the CBHCO of the past is known as Community Based Warrior Transition Unit (CBWTU). The latest public domain records show 1,200 injured soldiers have been processed through the Rock Island, IL location through 2008. I recently conversed with senior officers of Medical Command (MEDCOM), Warrior Transition Command (WTC) and Department of Veterans Affairs (VA) during the 6th annual Army Wounded Warrior (AW2) Symposium held in June 2010. The WTC and AW2 oversee the most severely injured soldiers. Based on those conversations I can share the following statistics for your consideration:

- The WTC has served 16,000 soldiers since it's formation in 2007
- Of the current 9,500 WTC soldiers 4,500 are going to Medical Evaluation Boards (MEB)
- WTC soldiers who go to an MEB have 9 injuries to be rated on *average*
- Army-wide (does not include other services) 15,000 soldiers per *year* go to MEBs

My comments are based on my own observations, experiences and conversations. I know the need exists for better care of poly-trauma injured soldiers, and veterans, over the long term. If a facility, such as the planned Warrior's Gateway, existed in the upper-Midwest I could have been closer to my family for the years of rehabilitation I endured. This might well have accelerated my own recovery. But my concerns are not really for myself. I'm concerned about helping the injured soldiers and the families who are only now coming to terms with the unexpected. What of the soldiers injured early in OEF/OIF who were not treated completely and are re-investigating their options for proper extended care. I appeal to this Review Board to understand the need for, and the value offered to the greater community and our soldiers/veterans by, Warrior's Gateway.

Thank you for this opportunity to share my thoughts and for your attention to the Warrior's Gateway project.

July 30, 2010

Subject: Warriors Gateway Public Hearing

We strongly opposed the Warriors Gateway proposal, which would consist of 120 skilled nursing beds and 85 assisted living apartments in Winnebago County. We have been told the proposed facility would lessen the burden on skilled nursing facilities in both Winnebago and Stephenson Counties. Based on the Service Review Board's Bed Inventory, Winnebago County does not have a demonstrated need for additional beds and therefore, are not burdened.

Many of the skilled nursing facilities in Winnebago County are not running at optimal occupancy levels. For instance, Provena St. Anne Center is currently running at 88%, and Provena Cor Mariae is running at 88%. Many homes in Winnebago are running well under 80% while maintaining a good reputation for quality care. Skilled facilities in Winnebago County have available beds but have not seen a demonstrated need to fill those beds.

The Warriors Gateway proposal references the need for VA contracts to care for Veterans with severe multiple injuries known as polytraumas. The June 14, 2010 letter from the Department of Veterans Affairs indicates that the 120 bed facility would specialize in Traumatic Brain Injury and Polytrauma services for Veterans returning from Iraq or Afghanistan. The letter states, "Although there are no specific demand projections for returning Veterans needing residential Polytrauma and/or TBI service, it is expected to continue to be a very small number" and "that it appears unlikely that there would be adequate Veteran demand to support the proposed 120 bed facility in the Rockford area".

Given the review conducted by the Department of Veteran Affairs, it would seem likely that Warriors Gateway would then need to fill their beds with the same population as all of the other skilled facilities in the county that are currently experiencing lower capacities. Therefore, one must conclude that there is not a defined need for additional skilled beds in these communities.

Sincerely,

Janelle Chadwick
Provena St. Anne Center
Administrator

Teresa Wester-Peters
Provena Cor Mariae Center
Administrator



CARE CENTER

1660 South Mulford Road • Rockford, Illinois 61108 • 815/397-8700 • Fax 815/397-4880

July 29, 2010

Mr. Mike Constantino, Supervisor, Projects Review Section
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

Dear Mr. Constantino:

I would like to introduce myself as the Administrator at Rosewood Care Center of Rockford. I am writing this letter to oppose the Warrior's Gateway C.O.N. application to construct a 120 bed skilled nursing facility in Rockford, project 10-032.

In the Competition Study Revere indicates that the services for TBI's are limited or non-existent. This is not accurate. Most, if not all, Skilled Nursing Facilities in the area are well equipped to provide specialized rehabilitation for patients with TBI's. In addition to this, Van Matre Healthsouth Rehabilitation *"specializes in rehabilitation of stroke and other neurological disorders, brain and spinal cord injuries..."* They have fifty beds and are the first choice for the Hospital Discharge Planners in the area, when discharging a patient with a TBI.

The application states on Table 6-1, Incidence of TBI in the Primary Market Area estimated number of cases in 2009. This chart includes ages 0-17, which account for 1.1% of the 2009 PMA population, or 836 people. These ages should not have been included in the data since nursing homes cannot admit individuals under the age of eighteen(18), without prior written approval from IDPH, per Illinois Administrative Code, Section 300.620. Table 6-1, Table 6-2, and Table 6-3 are therefore completely inaccurate. Once the 0-17 age category is removed the number of TBI cases drop significantly.

Our facility, as many others in the area, struggle to maintain our census, which is well below the 90% occupancy standard. The average occupancy of the twenty-one(21) facilities within a thirty-minute drive was 77.83%, according to data taken from the Long-Term Care Facility Questionnaire for 2008, which was also included in the application. The construction of Warrior's Gateway would drastically decrease the census of, not only our facility, but many others in the area (as indicated on the attached spreadsheet and graph).

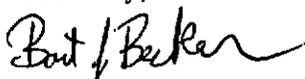
The CON application for another nearby Revere project (Pecatonica Pavilion, project 10-031), "Service to Planning Area Residents" page states that *"the surplus of beds only exists in Rockford."* If Revere documents this on another CON application it must be true. They are admitting that there is no need for and that there are a surplus of beds in Rockford!

There is no need for V.A. approved beds in the Rockford area. The Department of Veterans Affairs, Great Lakes Health Care System, sent an opposition letter regarding the Warrior's Gateway project. According to the letter, *"The majority of patients have mild TBI's that can be effectively treated in home and community based settings..."* *"there are no specific demand projections for returning Veterans needing polytrauma and/or TBI services, it is expected to continue to be a very small number."* The V.A. also wrote that, *"It appears unlikely that there would be adequate Veteran demand to support the proposed 120 bed facility in the Rockford area."* In addition to this, the Stephenson County Nursing Center does have a V.A. contract and has plenty of beds available as identified by their occupancy of 70.4% (as indicated in the CON application completed by Revere).

As a Nursing Home Administrator staffing is a very significant factor in the viability of a facility. Revere has stated in their application that *"Professional nursing staff – RNs, LPNs, and CNAs – can be recruited from existing long term care facilities in Rockford..."* This is very troubling as staff turnover and the utilization of nurse agencies can impact continuity of care, quality of care, not to mention the financial impact.

Most of the facilities in the Rockford area are well below the 90% occupancy standard. The existing facilities can indeed accommodate the specialized needs of patients with TBI's. The Department of Veterans Affairs, Great Lakes, doesn't feel that there is a Veteran demand for a 120 bed facility. The Warrior's Gateway is definitely not needed therefore the Certificate of Need for Warrior's Gateway should be denied.

Sincerely,



Bart J. Becker, Administrator
Rosewood Care Center
1660 South Mulford Road
Rockford, Illinois 61108

10-032

DEPARTMENT OF VETERANS AFFAIRS
VA Great Lakes Health Care System
Veterans Integrated Service Network 12
5000 South 5th Avenue, Building 18
Hines, IL 60141-3030



June 14, 2010

RECEIVED

JUN 16 2010

HEALTH FACILITIES &
SERVICES REVIEW BOARD

Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

Dear Executive Secretary:

VA Great Lakes Health Care System, Veterans Integrated Service Network 12 (VISN 12) would like to comment on the Warrior's Gateway project application for a new facility in Rockford, IL. In May 2010, Partner's for Caring Development Inc., in collaboration with Revere Healthcare and Transitional Living Services submitted a proposal for a 120 bed facility specializing in Traumatic Brain Injury and Polytrauma services. The primary focus of the facility would be for Veterans returning from Iraq or Afghanistan. VISN 12 would like to provide information on services currently available for this population and potential demand in the targeted area.

VISN 12 is one of 21 service networks administered by the Department of Veterans Affairs through the Veterans Health Administration. VISN 12 is responsible for providing health care services to Veterans in northern Illinois, Wisconsin and the upper peninsula of Michigan. These services are provided through 7 medical centers and 32 community outpatient clinics. A large multispecialty outpatient clinic has been administered by the VA in Rockford, IL for over 25 years.

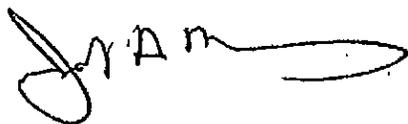
Hines VA Hospital is the designated Polytrauma Network Site for VISN 12. Polytrauma Network Sites provide specialized, post-acute rehabilitation in consultation with VA's Regional Rehabilitation Centers in a setting appropriate to the needs of Veterans, service members, and families. These Network Sites provide proactive case management for existing and emerging conditions and identify local resources for VA and non-VA care. Hines is currently treating 67 polytrauma Veterans as outpatients and historically has had limited need (less than 10 Veterans) for a transitional residential facility. Also, Hines has screened 382 Veterans with positive evaluations for Traumatic Brain Injury (TBI) and 93 of these patients are actively being followed. The majority of patients have mild TBI's that can be effectively treated in home and community based settings, with less than 12 patients in the moderate to severe category that may require more intensive therapy.

The proposed Warrior Gateway facility identifies Winnebago County as the primary service area with two thirds of the residents coming from this county. Currently,

22% of the 22,569 Veterans residing in Winnebago County are under 45 years old and are in the age cohort identified in the proposal. There are 612 Veterans from the Iraq and Afghanistan conflicts that have enrolled with the VA for care from Winnebago, Boone and Stephenson Counties. Although there are no specific demand projections for returning Veterans needing residential polytrauma and/or TBI services, it is expected to continue to be a very small number. VISN 12 has planned construction of a 10 bed extended care facility using the THE GREEN HOUSE® concept targeting younger Veterans. This facility will be located at the North Chicago VAMC and will be the primary location for placement of younger Veterans in need of residential polytrauma and/or TBI services for the entire VISN 12 service area. It appears unlikely that there would be adequate Veteran demand to support the proposed 120 bed facility in the Rockford area.

VISN 12 planning and clinical representatives will continue to work with the Warrior Gateway sponsors and other community partners to identify and implement the best care options for Veterans. Thank you for the opportunity to provide information on this endeavor for your consideration and planning.

Sincerely yours,

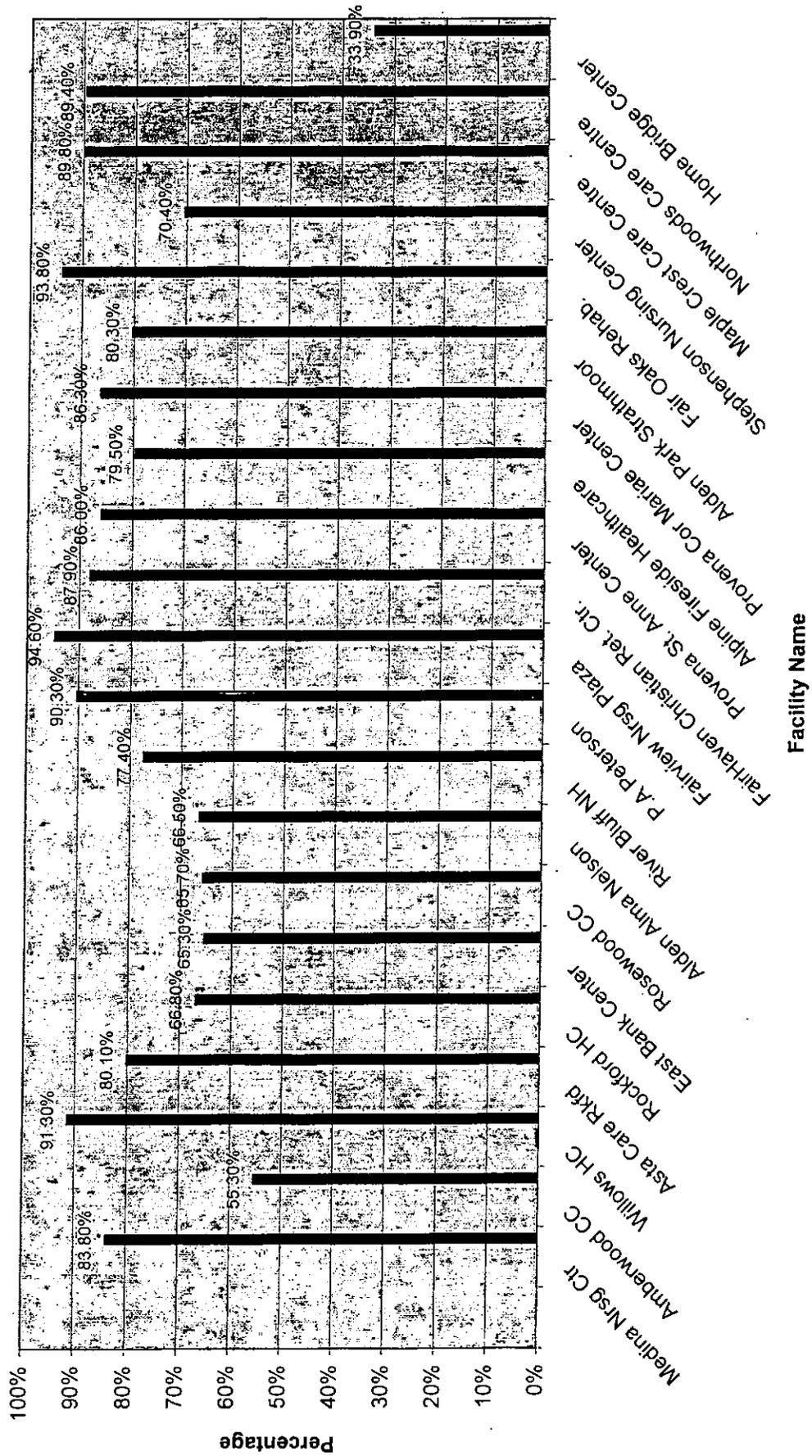
A handwritten signature in black ink, appearing to read "J. A. Murawsky". The signature is stylized with a large, sweeping flourish at the end.

Jeffrey A. Murawsky, M.D.
Network Director

Approved Health Care Facilities within a 30 minute drive time to Warrior's Gateway

Facility	County	Licensed Beds	Distance	Total Patient Days	Occupancy %	Peak Beds Occ %
Medina Nrsng Ctr	Winnabago	89	18.14 mi	27,287	83.80%	85.70%
Amberwood CC	Winnabago	162	3.79 mi	32,768	55.30%	62.60%
Willows HC	Winnabago	91	5.35 mi	30,407	91.30%	91.30%
Asta Care Rkfd	Winnabago	130	6.00 mi	38,121	80.10%	82.70%
Rockford HC	Winnabago	97	4.38 mi	23,725	66.80%	66.80%
East Bank Center	Winnabago	54	6.52 mi	12,907	65.30%	84.00%
Rosewood CC	Winnabago	120	12.69 mi	28,875	65.70%	65.70%
Alden Alma Nelson	Winnabago	268	13.53 mi	65,256	66.50%	66.50%
River Bluff NH	Winnabago	304	7.56 mi	86,146	77.40%	79.50%
P. A Peterson	Winnabago	127	5.74 mi	48,172	90.30%	90.30%
Fairview Nrsng Plaza	Winnabago	213	13.44 mi	73,747	94.60%	94.60%
FairHaven Christian Ret. Ctr.	Winnabago	96	8.78 mi	59,721	87.90%	92.70%
Provena St. Anne Center	Winnabago	179	7.58 mi	56,317	86.00%	86.00%
Alpine Fireside Healthcare	Winnabago	66	7.95 mi	30,063	79.50%	79.50%
Provena Cor Mariae Center	Winnabago	73	8.05 mi	40,624	86.30%	86.30%
Alden Park Strathmoor	Winnabago	189	14.70 mi	55,568	80.30%	86.80%
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Totals		2777		853,344	77.83%	79.92%
<i>Note: Total Occupancy Percent within the 30 minute drive time was 84.18% for 2008.</i>						

Approved Health Care Facilities within a 30 minute drive time to
Warrior's Gateway
Occupancy Percentages in 2008



July 30,2010

Dear Health Facilities and Services Review Board:

I am here to express on opposition to the application to construct a 120 bed skilled nursing facility in Rockford.

As the Marketing/Admissions Coordinator at Rosewood Care Center, I can tell you that it has been a struggle to keep our facility at or above 80% occupancy. Rosewood is a respected facility in the Rockford community, but it is still difficult during the "slow" periods in health care, to keep our census at a competitive level due to the enormous competition in the area.

This new facility states that it is going to specialize in traumatic brain injury. In my experience, most rehab-able patients start off at an acute hospital. Van Matre located on Mulford rd. is the facility of choice for the hospitals and the patient families of brain injuries. If the patient does not fit Van Matre's criteria for therapy, the patient will then go to a skilled nursing facility. All skilled nursing facilities in Rockford are more than capable to treat the patient with proper nursing and therapy services.

I am also worried about staffing. Since I bring in the patient for services, the daily census dictates our staffing. So, instead of creating new jobs, the new facility will just be hiring staff that the other skilled facilities had to let go due to a drop in daily census.

Thank you for your time,

Michelle Almquist

Michelle
Marketing/Admissions Coordinator

July 29, 2010

**Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761**

Attention: Mr. Mike Constantino, Supervisor, Projects Review Section

Project: CON Application for Warrior's Gateway- Project 10-032

Dear Health Facilities and Services Review Board:

Please accept this correspondence as an initial expression of opposition to Partners for Caring Development Inc.'s application to construct Warrior's Gateway, a 120 bed skilled nursing facility to be located in Rockford, Il., Winnebago County. Based upon Partners for Caring Development's CON application, it seeks to construct 85 assisted living apartments and a vocational training center in addition to the 120 bed skilled nursing facility.

As I am sure you will find through other correspondence and data from other concerned area providers, the average utilization rate for 2008 does not meet the Board's 90% target occupancy rate to support the proposed project. In fact, it comes nowhere even close.

The facilities used a reference for the proposed new facility are all located within a thirty minute travel time from the proposed new site. A review of the Long Term Care Facility Questionnaire for 2008 indicated an average utilization rate within the thirty minute drive time to the new site at 77.83%. Of the 21 facilities located within the 30 minute drive time to the proposed new site, only four facilities met the 90% occupancy rule with only two other facilities showing average utilization at 89.4% and 89.8%. The other 15 facilities all showed average occupancy percentages well below the 90% targeted rate, including Rosewood Care Center of Rockford.

The CON seeks to construct an additional 120 bed skilled nursing facility of all private rooms that is certified for Medicare and Medicaid as well as VA contracts. The need for the facility was based upon the targeted population of returning veterans and the local population requiring unmet special programs and services to address:

- Traumatic Brain Injury (TBI)
- Spinal Cord Injury
- Poly Traumatic Injuries (PTI) and,
- Post Traumatic Stress Disorder (PTSD)

Although the targeted clients include "disabled veterans primarily from the Iraq and Afghanistan wars who have suffered multiple injuries both on and off the battlefield, a

recent letter from the Department of Veteran Affairs did not reflect the need of the 120 bed skilled facility to treat returning veterans needing residential polytrauma and/or TBI services. The letter dated June 14, 2010 mentioned:

1. Although there are no specific demand projections for Veterans needing residential polytrauma and/or TBI services, it is expected to continue to be a very small number.
2. VISN 12 had planned construction of a 10 bed extended care facility using THE GREENHOUSE ® concept targeting younger Veterans. The facility will be located at the North Chicago VAMC and will be the primary location for placement of younger Veterans in need of residential polytrauma and/or TBI services for the entire VISN 12 service area.

The Department of Veterans Affairs letter further stated that it “appears unlikely that there would be adequate Veteran demand to support the proposed 120 bed facility in the Rockford area.” Further contradicting Veteran demand to support the proposed facility is the availability of beds at Stephenson County Nursing Center, which currently maintains a VA contract and an average occupancy of 70.4%.

The CON application also included data to suggest the need for a facility to specialize in providing programs and services for adults with traumatic brain injuries. However, the data used to support the need is flawed and is not consistent with the population that would be served by a skilled nursing facility. For example, the TBI Residential Assisted and Skilled Nursing Unit Demand study reflected a capture rate of 10% but included the number of cases from all age groups, including the 0-17 age group which accounted for the second highest number of estimated case incidents of TBI in 2009. This age group would not be served by Warrior’s Gateway. This one flaw skews the market feasibility of Assisted Living and Skilled Nursing unit demand in the primary market area considerably.

Further complicating the validity of market feasibility study is the lack of any specific data that would substantiate how many cases required any type of residential care and services. Although the market study assumes a capture rate of 10% is conservative, it cannot be determined that this figure is even a reasonable estimate given the age of the larger co-hort typically affected by TBI, which is individuals 0-44 years of age, who based upon clinical literature, typically recover and function independently.

The CON application also suggests the lack of facilities and programs in the Rockford area to address the needs of TBI cases. However, there is no data to support this conclusion. In an area with average yearly occupancy levels at 77.83% or lower, a majority of the skilled nursing facilities, including Rosewood Care Center, remain more than adequately equipped with the necessary services and programs to effectively treat TBI cases. In particular, Rosewood Care Center has been successful in the follow-up treatment and care of TBI cases after completion of intensive rehabilitation programs at Van Matre HealthSouth Rehabilitation Hospital that also specializes in brain and spinal

cord injuries. Van Matre HealthSouth Rehabilitation Hospital remains conveniently located at 950 S. Mulford in Rockford, IL and part of the Rockford Health System.

In conclusion, Partners for Caring Development Inc.'s proposed project to construct the 120 bed skilled nursing facility clearly does not meet the required criterion and is based upon a flawed and incomplete analysis of the need for any additional special programs and services to address the targeted market. For these very valid reasons, the certificate of need application for Warrior's Gateway should be denied.

Sincerely,

A handwritten signature in cursive script that reads "Joli Koch". The signature is written in black ink and is positioned below the word "Sincerely,".

Joli Koch, Regional Operations Manager
Rosewood Care Centers

Approved Health Care Facilities within a 30 minute drive time to Warrior's Gateway

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Partnering with the Rehabilitation Leader

Van Matre HealthSouth Rehabilitation Hospital is a partnership between Rockford Health System and HealthSouth Corporation. HealthSouth is the nation's largest provider of inpatient rehabilitative healthcare services. Additional information including career opportunities with Van Matre can be found on the web at www.healthsouth.com.

Home > [Who We Are](#) > Van Matre HealthSouth Rehabilitation Hospital

print

Van Matre HealthSouth Rehabilitation Hospital

Van Matre HealthSouth Rehabilitation Hospital (VMHS), located at 950 S. Mulford Road in Rockford, is the only rehabilitation hospital in northern Illinois outside of the Chicago area. We offer both inpatient rehabilitation and outpatient therapy, including a specialized outpatient program called Center for Community Re-entry, for patients who need more intensive therapy yet do not require an inpatient setting.

VMHS has been nationally-recognized for quality outcomes and patient satisfaction. It is ranked among the best of all HealthSouth rehabilitation hospitals in the country.

VMHS specializes in rehabilitation of stroke and other neurological disorders, brain and spinal cord injuries, amputations, orthopedic, cardiac and pulmonary conditions. Our goal is to improve our patients' function so they can return back home and to the activities they enjoy most.

Under the medical guidance of board-certified physiatrists, physicians who specialize in physical medicine and rehabilitation, patients work with rehabilitation nurses, licensed speech and language pathologists, licensed physical and occupational therapists, psychologists, dietitians, and case managers to rebuild their bodies, minds, and spirits.

VMHS is accredited by the Joint Commission on Accreditation of Healthcare Organizations. Our comprehensive inpatient rehabilitation program and our inpatient brain injury rehabilitation program are also accredited by the Council on Accreditation of Rehabilitation Facilities.

Hours of operation are 24 hours a day/ seven days per week. Visiting hours are 7:30 a.m. to 7:30 p.m. daily. Visitors are asked to refrain from visiting while a patient is in therapy.

For inpatient questions, call (815) 381-8500. For outpatient questions, call (815) 381-8600.

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10-032

DEPARTMENT OF VETERANS AFFAIRS
VA Great Lakes Health Care System
Veterans Integrated Service Network 12
5000 South 5th Avenue, Building 18
Hines, IL 60141-3030



June 14, 2010

RECEIVED

JUN 16 2010

HEALTH FACILITIES &
SERVICES REVIEW BOARD

Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

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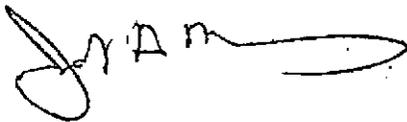
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VISN 12 planning and clinical representatives will continue to work with the Warrior Gateway sponsors and other community partners to identify and implement the best care options for Veterans. Thank you for the opportunity to provide information on this endeavor for your consideration and planning.

Sincerely yours,

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Jeffrey A. Murawsky, M.D.
Network Director