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October 14, 2013

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**HEALTH FACILITIES &
SERVICES REVIEW BOARD**

Ms. Courtney Avery, Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, Second Floor
Springfield, Illinois 62761

**Re: Alden Estates of Evanston
Technical Assistance subsequent to Intent-to-Deny
Project No. 13-023 (the "Project")**

Dear Ms. Avery:

Our Alden Estates of Evanston facility is an existing 99-bed home with 58 skilled beds and 41 sheltered care beds. Our Project is to convert the 41 sheltered care beds to become an all skilled facility. By a 4-4 vote (one absent), we received an Intent-to-Deny at the September 24 meeting. We are contemplating how to proceed in providing additional information to the Board, if needed, and would appreciate your technical assistance.

Project Would Have Had a Fully Positive SAR if Considered at Originally Scheduled August Meeting

When we filed our application on May 10 there was a calculated bed need in Planning Area 7B for 339 additional beds. We had planned and structured our project to fully comply with the Board's rules. Never in my memory has Alden ever proposed a project were a calculated bed need did not exist. Our request was scheduled for the August Review Board meeting. In July, we received a notice that our project was to be deferred from August to September. We believed at that time that the delay was not related to our project, but due to the Review Board staff's desire to relieve an over-crowded August meeting agenda. Though disappointed with the delay, we wished to work collaboratively with the Board and did not object.

We were more disappointed, however, when we found that a number of applications filed and deemed complete after ours, were not deferred but instead heard at the August meeting ahead of our own. Our greatest disappointment, however, came when the SAR made two negative findings based solely on the calculated bed need formula that was changed at the August meeting, and that this finding was used as the basis for an intent-to-deny. We again note that our project would have received a fully positive SAR if heard at the August meeting when scheduled.



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Question Regarding Possible Request to Reduce the Number of Beds to be Converted

Our desire is that the Board consider our project to convert 41 beds in light of the unusual scheduling structures. We appear to be the only project impacted by this scheduling change and approval of our project would not create a precedent for other projects. Although we prefer to convert all skilled care beds at once, our most pressing need is to accommodate our 23 current residents who are likely to age out and require nursing care in the next year. At a minimum, we need to convert 23 beds to skilled care to assure that all current sheltered care residents who may require skilled care can remain in their home.

Our technical question is whether we can continue to request the 41-bed conversion while acknowledging that, if requested to do so at the Board meeting, we would reduce our request to convert only 23 beds. If we could offer that change at the time of the hearing, we would likely provide only limited, if any, new material so that we could possibly be on the November Board agenda.

Unlike most situations, a change in the number of beds has no practical impact upon the cost or size of the project. The change is simply a licensure change and there is no construction cost involved. The sole project cost is simply a fair market value estimate relating to calculating the CON application fee, and consequently reducing the number of converted beds at the time of the hearing would not significantly impact the application.

Conclusion

We had accommodated the Board's scheduling needs for the August meeting without objection and would similarly ask that the Board consider this project in light of the positive SAR that would have been in effect at the time of the originally scheduled hearing.

Alternatively, we would hope to work with the Board to at least find accommodations for our existing 23 sheltered care residents that will develop need for nursing care. We ask your guidance as to whether we can proceed in the alternative: continuing with our original 41-bed conversion request and then, if necessary as the Board may suggest at the meeting, to reduce our request to 23 beds. We look forward to your guidance on this matter.

Sincerely,

Randi Schullo

Enclosure

cc: John P. Kniery
Joan Carl
Joe Ourth