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WelcomeToMonarchLanding.com

January 26, 2016

Michael Constantino
Supervisor, Project Review Section
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761
ATTN: Courtney R. Avery, Administrator

RECEIVED

JAN 27 2016

HEALTH FACILITIES &
SERVICES REVIEW BOARD

**Re: Opposition to Project No: 15-056
Transitional Care of Lisle**

Dear Ms. Avery,

The Springs at Monarch Landing is a five-star rated, 96 bed skilled nursing facility located in Naperville, Illinois, within Health Planning Area 7-C. Our community opened in November 2014 to serve the post-acute care and long-term care needs for residents living at Monarch Landing and in the greater Naperville area. Our building was designed to have six separate living areas, featuring predominately private residential rooms with en-suite baths, lounge areas and country kitchens all within a warm and healing environment. This unique design is smaller in scale, catering to just 16 individuals each, which enables each person to focus on their own health, social and emotional needs.

Currently, two of these areas are dedicated to providing personalized post-acute care to individuals discharging from the hospital and requiring additional nursing care or therapy services in order to return to their homes. In addition, upon occupancy stabilization, anticipated for early 2017, post-acute care services will consume two more of these areas and provide services to 60 individuals per day.

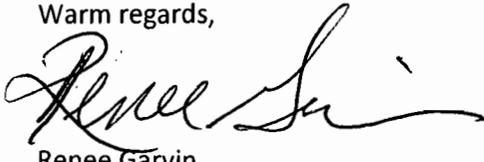
From a programmatic perspective, Monarch Landing has partnered with Edward Medical Group, an affiliate of Edward Hospital, to provide a full-time physician and medical director at The Springs. We are the first and only community in our geographic area to have a dedicated full-time primary care physician, which enables our patients to receive the timeliest and most advanced medical care in a skilled nursing environment. Our physician works hand-in-hand with our team of nurses, physical, occupational and speech therapists, social workers and registered dietician to ensure the very best in clinical and rehabilitative care.

Transitional Care of Lisle claims their project is filling a service need not currently available within the geographic area. This is simply not true. The Springs at Monarch Landing is designed both physically and programmatically to care for adults of varying ages with post-acute care needs. If the Certificate of Need is granted to Transitional Care of Lisle, we anticipate that our occupancy will be negatively impacted, which will cause serious financial implications to our organization and our ability to provide excellent care and services. Monarch Landing is committed to maintaining our 5-star rating as deemed by CMS, but must be able to achieve the patient mix and economies of scale as planned when the project was approved.

Michael Constantino, Supervisor
Courtney R. Avery, Administrator
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When you consider the various factors required to gain approval for a skilled nursing facility Certificate of Need, such as ability to provide a new service or impact to competitor utilization, it is clear that Transitional Care of Lisle does not meet the criteria. We ask that the Board deny their request for Project 15-056.

Warm regards,

A handwritten signature in black ink, appearing to read "Renee Garvin". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Renee Garvin
Executive Director, Monarch Landing

RG:mk



Burgess Square
Healthcare & Rehab Centre

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Re: Opposition to Project No. 15-056
Transitional Care of Lisle

Dear Ms. Avery,

Appalling! To think that the folks who are applying for the Transitional Care of Lisle actually state that their project will not adversely impact other facilities is deplorable. In addition, the statement that no existing facility in the area provides the level of care proposed is simply an outright lie! As Administrator of Burgess Square HealthCare and Rehabilitation Centre I strongly oppose Project # 15-506.

BSHRC provides post-acute cardiac, orthopedic, respiratory and wound services to thousands of patients each year. We have specialists that round in our facility weekly, including cardiology, nephrology, infectious disease, physiatry, neurology, psychology, psychiatry, and wound care. We service the exact population that Transitional Care sates is going unserved. To allow them a CON would further exacerbate the already critical state the long term care and post-acute care sector already operates in on a daily basis in the state of Illinois. To think that if this CON were allowed that they would be able to skim off the top section of services from established high quality providers is disheartening to say the least. We not only offer exceptional care to these exact patients but rely on them to make ends meet in a state that is in fiscal disarray with the second lowest Medicaid rate and worst payment cycle in the nation. We have built a clinical infrastructure that would be greatly hurt by allowing this facility to open. There in not a need for these services in this area whatsoever.

I have operated for over a decade in DuPage County and my Owner for over two decades in both Hinsdale and Westmont and never has there been a need for adding more beds especially in an area such as proposed. It is the life blood of our business to be able to pay significant salaries and employ excellent clinical and compassionate personnel to reduce unwarranted readmissions back to the hospital. We do exactly that here at Burgess Square.



Burgess Square
Healthcare & Rehab Centre

If no one else is providing the care that Transitional Care says they are going to provide than who in fact is meeting that need now? Exactly – we are, the other providers in the marketplace! We have been providing high end clinical post -acute care for years. That's a fact!

I strongly urge the Illinois Health facilities and Services Review board to deny this project as it is not at all warranted in this geographic area and would seriously harm the providers who are already servicing this cliental.

Sincerely,

Kristin Thrun, MPH, MBA, LNHA

Administrator, Burgess Square HealthCare and Rehabilitation Centre.

Wynscape

HEALTH & REHABILITATION
— at Wyndemere —

January 26, 2016

Michael Constantino
Supervisor, Project Review Section
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761
ATTN: Courtney R. Avery, Administrator

Re: Opposition to Project No. 15-056,
Transitional Care of Lisle

Dear Ms. Avery,

I represent Wynscape Health and Rehabilitation, who provides services in Health Planning Area 7-C, and wish to **oppose** Project No. 15-056, which would establish a 68-bed long-term care facility in Lisle, Illinois, under Transitional Care of Lisle. We feel that approval of the application would have an adverse effect on our community and others in the planning area and that the application does not clearly represent the services we offer and does not accurately represent the need that they would be filling.

In their application they state that:

Transitional Care of Lisle, will provide skilled nursing, intensive rehabilitation, specialized programs in orthopedics, wound care, cardiac rehab and that no existing skilled nursing facility in the area provides the level of care proposed by the applicant, Transitional Care of Lisle, will therefore not lower utilization of communities in the market area.

We specialize in all of those services listed above including cardiac rehab, complex wound management, oncology care, IV management and orthopedics. Additionally, we have a full time Physiatrist (Physician who specializes in rehabilitation medicine) and Nurse Practitioner on staff who manage patient complications and collaborate daily with the resident's primary physicians which is unique in the market. 50% of our business is exactly what they are claiming as a service that is not offered in the market and many other communities also manage complex patient care issues as well. The addition of these 68-beds would clearly lower the utilization of the market area.

Transitional Care of Lisle also states in their application that:

They will bring a "new realm" to SNFs in terms of quality, acuity and coordination of care, patient comfort, satisfaction and evidence based quality outcomes as it pertains to the short term rehab patient. They also state that they will specialize in clinical pathways, quality and service mix unlike existing SNFs.

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If you look at our outcomes, we clearly are a SNF in the market area that meets or exceeds the criteria they have stated does not exist. We are a 5 Star Rated community and 5 stars in quality, we take all of the above and in addition we support a large volume of high acuity oncology patients, patients with movement disorders as well as complex IV management, and we are a Preferred Provider for Northwestern Medicine, Central DuPage Hospital / Delnor Hospital ACO.

It is clear that the application does not give an accurate picture of the current level of care capabilities of the facilities in the market, as Wynscape is able to handle a wide array of patient needs from strengthening to the very complex. In addition to our facility, there are several other facilities in the 26 mile radius listed in the application that provide many of the services listed as not being provided.

I respectfully submit these comments in opposition to Project 15-056, and request that the board deny Transitional Care of Lisle's application to establish a new facility.

Sincerely,

A handwritten signature in black ink, appearing to read "Aimee Musial". The signature is fluid and cursive, with a large loop at the end.

Aimee Musial
Senior Administrator
Wynscape Health & Rehabilitation



Michael Constantino
Supervisor, Project Review Section
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
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ATTN: Courtney R. Avery, Administrator

**Re: Opposition to Project No. 15-056,
Transitional Care of Lisle**

Dear Ms. Avery,

BRIA of Westmont is a 215 licensed Skilled Nursing Facility at 6501 S Cass Ave. Westmont IL 60559. We are within the HSA and the service area of the proposed project. While we understand that there is technically a bed need for 168 beds, it is apparent from the local facilities census that there is not an actual bed need. Our current census is 150. Well below the 90% utilization threshold.

BRIA of Westmont has the ability and does provide service to all of the transitional patients that are outlined in the applicant's application as their target market. In addition to having that ability, BRIA Of Westmont just completed a \$6,000,000 addition. This addition was done without exceeding the Capital Expenditures Threshold Rules and did not require a CON. This addition did not add one additional bed, if there was an actual need for these beds in the community; BRIA would have and could have added an additional 20 beds under the board's rules and did not. We only added common areas to better serve our entire client base. The areas added include: an additional state-of-the-art Therapy gym, an Occupational Therapy suite, and an Aquatic Therapy pool that is specially designed for short term transitional patients. These are cutting edge therapy modalities that are not being provided in any other SNF in the region.

At BRIA of Westmont, we are proud to serve all members of our community, with a HIGH commitment to serving the Medicaid population. We service Transitional care, long term care, respite care, high acuity patients, and less acute patients. If we would lose the high acuity and transitional patients it would make serving the lower socioeconomic patients, specifically those that are Public Aid recipients, more difficult if not impossible. **The applicants claim that no one provides these services in the area are simply untrue. Our new unit is providing exactly what the applicant claims is not being provided and more.**

The applicant is clearly suggesting that they should be allowed to build a facility that will take from the current facilities referral base in order to supplement the current need for the specific type of patient they would require to make their facility financially viable. This goes completely counter to the purpose of the CON Boards rules and intent.



While we believe there should be access to healthcare for everyone, we do not feel that a new provider should, nor should they be allowed to enter a market and "cherry-pick" the highest paying recipients of care. It is our belief and practice, to provide the quality care to all individuals regardless of their socio-economic status, or the pay source for their care. If this CON is granted it will ultimately hurt the quality of care provided by other providers to the rest of those needing care that this new facility is not willing to provide.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Weiss". The signature is fluid and cursive, written over a light blue horizontal line.

Daniel Weiss
CEO BRIA Health Services



January 26, 2016

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Supervisor, Project Review Section
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761
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**Re: Opposition to Project No. 15-056,
Transitional Care of Lisle**

Dear Ms. Avery,

Community Nursing & Rehabilitation Center is Joint Commission accredited and a preferred provider in the Illinois Health Partners ACO. We are located a few minutes from the proposed site of Project No. 15-056, which would establish a 68-bed long-term care facility in Lisle, Illinois, under Transitional Care of Lisle. If approved this facility would have a devastating effect on our facility and other providers in the planning area.

The applicant misrepresents the services provided by our facility as well as the other area facilities. In their application they state they will provide skilled nursing, intensive rehabilitation, specialized programs in orthopedics, wound care, cardiac rehab and that no existing skilled nursing facility in the area provides the level of care proposed by the applicant. This is a false claim and shows a total lack of understanding as to what services the area facilities provide.

At Community Nursing & Rehabilitation Center we specialize in all of the services listed by the applicant including a physician directed cardiac rehabilitation program, onsite dialysis services, complex wound management, IV management and orthopedics. Additionally, we are about to open our new advanced pulmonary unit which will service patients in need of ventilator and tracheostomy care as well as COPD and other advanced pulmonary needs. Our Medical staff includes Pulmonary, Cardiac, Infectious disease, Nephrology and Wound care Specialists who round in our facility, in addition to on staff 7 days a week Nurse Practitioner services.

Over the last 12 months there has been a substantial decrease in the length of stay of patients receiving post-acute care at our facility. This is due to the focus of the ACO's to discharge patients home earlier or to a lower cost setting. As such our average census has had a considerable decrease. In addition the effort to send patients home from the hospital with home health and other community based services has had a negative impact on the occupancy of area post-acute providers. This trend will only continue and as such any projected increased need for skilled nursing services can easily be met by the area providers whom almost all are below the target utilization of 90%.

We respectfully ask the Board to deny Transitional Care of Lisle's application as it would have a devastating impact on our facility and will duplicate services already being provided by our facility and other high quality facilities in the area.

Sincerely,

A handwritten signature in black ink, consisting of a stylized first letter followed by a series of loops and a long horizontal stroke.

Community Nursing & Rehabilitation Center
1136 North Mill Street
Naperville, IL 60659