

659 E. Jefferson St.  
Freeport, IL 61032  
815 232-6181 Tel  
815 232-6143 Fax

12-014



**RECEIVED**

**MAR 16 2012**

**HEALTH FACILITIES &  
SERVICES REVIEW BOARD**

March 12, 2012

Mr. Dale Galassie  
Chairman  
Illinois Health Facilities and Services Review Board  
525 West Jefferson Street, 2<sup>nd</sup> Floor  
Springfield, Illinois 62761

Subject: Manor Court of Freeport Expansion Project

Dear Chairman Galassie:

Provena St. Joseph Center is strongly opposed to the Manor Court of Freeport expansion project proposal to add 27 long-term care skilled beds to include conversion of 6 Supportive Living beds as well as an addition of 21 skilled nursing beds in Freeport, Illinois. We have been told the proposed expansion would lessen the burden on skilled nursing facilities in the area and meet a demonstrated need in the community. However, several facts lead us to question how this could be true.

The addition of the 27 long-term skilled beds will negatively impact the other facilities in the area. According to the Certificate of Need (CON) the facilities in Freeport are operating below optimal thresholds. The addition of the long-term beds will only increase the under-utilization of current facilities already at low occupancy as well as take those who are operating at marginal levels below as well.

In October 2011, Freeport Health Network Hospital closed their Skilled Nursing Unit (SNU) due to a decrease in demand for skilled nursing/therapy and the capacity of the facilities in the area to care for those who did have a need for service. The SNU was operating 26 beds at the time but was running well below capacity.

In 2009, RAI (Manor Court of Freeport ) purchased Freeport Rehabilitation and Nursing Center in Freeport and according to the website [www.2012UCompareHealthCare.com](http://www.2012UCompareHealthCare.com), was only running at a 56% occupancy rate using 80 of the 143 beds. If Manor Court is in fact marketing itself as a full continuum of care model, they are not fully utilizing the capacity of a long-term facility they operate in this market. The CON identifies Manor Court as turning clients away for services when they are not sending them to their own sister facility for care.

The CON also identifies facilities in the area as being outdated and not allowing patient access to care. Many facilities in this market are currently undergoing or planning renovation projects of their own to provide for modernization for residents/patients but modernization does not reflect quality of care and resident quality of life, as stated in their proposal.

According to the Nursing Home Compare website located at [www.medicare.gov](http://www.medicare.gov), facilities in the area, referenced in the CON as being outdated, have higher Quality Measures than that of the applicant. For example, Manor Court of Freeport had 2 out of 5 stars for quality measures while Provena St. Joseph Center, Stephenson Nursing Center and Lena Living Center all had 4 out of 5 stars on quality.

The existing beds in the community are able to meet the demand of the population at this time. As the population ages, many individuals will be looking to these facilities for short-term rehab services with the goal to return to the community. The demand for extended long-term care has been decreasing which has allowed for beds to "open up" in these facilities to care for the short-term patient. Long-term care facilities are able to keep up with the demand of the community and there is not a demonstrated need for additional beds at this time.

In summary, several reasons exist why the number of long term skilled nursing beds should not be increased by 27 beds. The reasons include...

- adequate current and future capacity in the area,
- demonstrated superior quality scores at existing facilities, and
- potential of further erosion of existing volume from partially full facilities.

Thank you your leadership and attention regarding this important topic. Please let us know if we can supply additional information.

Sincerely,

  
Michelle Lindeman  
Administrator