

**Signature Page for Responses to MHCC 37 Questions dated December 16, 2025**

**Statement:**

**I hereby declare and affirm under the penalties of perjury that the facts stated in this set of responses to questions and attachments are true and correct to the best of my knowledge, information, and belief. I also affirm that any previously submitted documents and information are true and correct to the best of my knowledge, information, and belief.**

\_\_\_\_\_  
Signature

**Jack Shelby, Authorized Official for:**

\_\_\_\_\_  
Date

1/7/26

Anchorage Nursing and Rehab Center LLC  
Blue Point Nursing and Rehab Center LLC  
Clinton Nursing and Rehab Center LLC  
Cumberland Nursing and Rehab Center LLC  
Ellicott City Nursing and Rehab Center LLC  
Fayette Nursing and Rehab Center LLC  
Forestville Nursing and Rehab Center LLC  
Fort Washington Nursing and Rehab Center LLC  
Hagerstown Nursing and Rehab Center LLC  
Holly Hill Nursing and Rehab Center LLC  
Kensington Nursing and Rehab Center LLC  
Laurelwood Nursing and Rehab Center LLC  
Marley Neck Nursing and Rehab Center LLC  
Northwest Nursing and Rehab Center LLC  
Pleasant View Nursing and Rehab Center LLC  
Silver Spring Nursing and Rehab Center LLC  
South River Nursing and Rehab Center LLC  
Westminster Nursing and Rehab Center LLC

Per the MHCC letter dated December 16, 2025, below are responses to the 37 questions regarding the 18 CommuniCare acquisition applications. For ease of reference, this document is independently page-numbered, beginning at 301. Subsequent Attachments are consecutively lettered after the original applications, beginning with I, and are independently page-numbered, beginning at 501.

## Ownership

- 1. For Precision Health and Dynamic Fiscal Services, LLC. Please provide more detail, including identification of the principals, leadership, and the specific consultation work provided by Precision Health. Identify all individuals or organizations who have invested in Precision Health, any outstanding loans, debts, and lines of credit. For any organizations that are owners or investors of Precision Health, identify all owners of those organizations. Does Precision Health own part of any organizations that are expected to be providing services to the facilities as part of the transaction? Identify whether there is any overlap of Propco and Opco ownership or principals related to this transaction? If so, please describe.**

**Response:** Please see a list of services provided by Dynamic/Precision attached in [Attachment I](#). Dynamic is owned by Robert Meisner 50% and Michal Rodkin 50%.

There are no investors, loans, or lines of credit; it does not have any organizational ownership - meaning that it is directly owned by Robert Meisner and Michal Rodkin.

For purposes of these responses, the facilities are grouped as follows: (i) eight facilities for which Health Consulting Services will serve as the administrative services provider (the "HCS Facilities"); (ii) six facilities for which Hallmark Health Consulting Services will serve as the administrative services provider (the "Hallmark Facilities"); and (iii) four facilities owned by Jack Shelby in his individual capacity, for which Health Consulting Services will serve as the administrative services provider (the "Shelby Facilities").

There is a small overlap between the ownership of the Propco and Opco entities:

Summit Lane Trust and AFH MD Trust each have an indirect 4.99% ownership of both the Propco and Opco of the HCS Facilities. The Trustee of Summit Lane Trust and AFH MD Trust is Perry Dinter.

In addition to the foregoing, the Trustee for SGN Healthcare Trust, an indirect owner of 10% of the Opco of the Hallmark Facilities, is Esther Stern. Esther Stern is also the Trustee of MD Silver Family Trust, an indirect owner of 10% of the Propco of the Hallmark Facilities.

Grantors/beneficiaries were not analyzed as our understanding is that Trustees control the trust. Grantors expressly relinquish control over the assets by granting the same to the Trust which is controlled 100% by the Trustee. Beneficiaries have no voting rights or ownership interest in the Trust and therefore have no voting or other rights to control the assets of the Trust. Any change of Trustee would be subject to approval of a change of ownership application and likely permission from any lender(s).

2. **Please provide unredacted copies of all contracts, agreements, or related documents between Dynamic Fiscal Services, LLC and/or Precision Health and the acquiring parties that describe the financial terms of the transaction, including any expected return on investment and the timeframe over which those returns are anticipated.**

**Response:** Dynamic/Precision is not an investor in this deal. It is simply an anticipated vendor. Please refer back to Services in [Attachment I](#).

3. **Please provide unredacted copies of all contracts, agreements, or other documents between the acquiring entities and the current owners of the facilities that relate to or govern the proposed acquisition.**

**Response:** Please see unredacted copies of the Operations Transfer Agreement attached in [Attachment J](#).

4. **Provide a copy of all communication sent to residents, resident representatives, and staff of the nursing home regarding the proposed transaction. Include the recent FAQs that were distributed to the CommuniCare employees.**

**Response:** The administrative services providers identified in Question 1 distributed “FAQs” to CommuniCare employees as attached in [Attachment K](#). Additionally, Notices were posted on December 29<sup>th</sup>, copies of which are attached with updated organization charts in [Attachment L](#).

## **Management**

5. **Provide copies of all contracts between the applicants and contractors that will be providing services at the facilities, including any fees expected to be charged by organizations providing services at the facilities.**

**Response:** While specific vendors have not been selected, these are the types of vendors anticipated to be used, see [Attachment M](#). Based upon the next inquiry, we have attached specimen contracts for APEX Global Solutions LLC, Health Consulting Services and Hallmark Health Consulting Services as [Attachment N](#).

6. **Please identify the individuals in leadership (responsible for daily management), and all direct and indirect owners of companies listed in the applications, including Apex Global Solution LLC, Health Consulting Services and Hallmark Health Consulting Services.**

**Response:** The highest ranking person responsible for the daily management of each Facility is the Licensed Nursing Home Administrator who will be assisted by the Director of Nursing and other department heads. The proposed Licensed Operator believes that Facilities must be managed at the facility level—there is likewise a Federal Statute which requires the Licensed Nursing Home administrator to “manage” the operations. Any consultants or vendors are just that, all responsibility remains with the LNHA and their team.

Apex Global Solution LLC is a large company that services many facilities. The vast majority are believed to have nothing to do with the Applicant. The Applicant has no involvement in Apex. It is not anticipated that Apex will be involved in the ownership or management of any facilities. To the extent any services of APEX will be utilized, it shall be financial reporting, billing and collections or other ministerial financial services. Management and ownership structure have been requested from Apex and they have declined to provide the same.

Health Consulting Services and Hallmark Health Consulting Services organizational charts were previously provided. Please see **Attachment O** which are revised organizational charts to show their management structures.

It should be noted that for corporate purposes, and signing authority, each operating entity is member-managed. That said, it is anticipated that the Holdcos will, by resolution, be manager-managed by Menachem Kosman and Moshe Pruzansky (owners of Health Consulting Services) for the HCS Facilities, Meir Silberberg (owner of Hallmark Health Consulting Services) for the Hallmark Facilities and Jack Shelby (ultimate owner) for the Shelby Facilities. Jack Shelby, as majority member of the ultimate owners, likewise has rights of signature for all Operator Entities.

7. **In the FAQs provided to staff members, the applicant states there is a consulting group named Prime Healthcare Management who will be overseeing Hagerstown, Pleasant View, Westminster, and Cumberland. Prime Healthcare Management has not been identified in the submissions. Please identify the investors, owners, leadership, and management, and provide detailed information on their role, including individuals responsible for daily management, and an organization chart.**

**Response:** HCS, which was disclosed as an administrative service company, was anticipated by the applicant to provide administrative consulting service to all facilities. HCS had been in discussions with Prime Healthcare Management to act as a subcontractor to HCS at four of the Facilities. Based upon more recent information, Prime Healthcare Management will not be acting as a subcontractor. While we believe it no longer relevant, It is believed that Prime Healthcare Management is owned directly or indirectly by Eliot Berger and David Perlow.

8. Describe in detail any planned changes to the management at any of the individual facilities following acquisition.

**Response:** CommuniCare currently runs the facilities. After the change of ownership, the applicants will run the facilities. The foregoing said there are no plans to change Administrators, DONS, or other integral staff. This will help ensure continuity of care, management, and minimal disruption. The disclosed Administrative Service Companies and consultants will likewise be added resources and they will assist with the formation of a new Governing Body which will consist of the LNHA, a clinician and an experienced operational consultant. The Governing Body will serve without compensation.

## Financial

9. Provide audited financial statements for the principals of the acquiring entities from 2023 to 2025 demonstrating the availability of cash reserves to pay the purchase price for each facility, to make the improvement described in the applications, and to operate each acquired facility for 90 days.

**Response:** Source of funds for the property purchase price is described in the separate Real Estate applications.

Neither the Trusts at issue nor Jack Shelby have audited Financial Statements. The foregoing said, our understanding is that the bulk of the real estate purchase price will be financed. See the Real Estate Application. There is no purchase price for the operations. Per the terms of the proposed Lease Agreement Bed Rights will belong to the Operators, and so long as such rights are utilized at their current location, no amount is due for such transfer. Should an Operator desire to move those bed rights to another location, they must pay the Real Estate entity the greater of [REDACTED] per bed or the outstanding balance due on the Mortgage for the relevant facility, plus remaining value of the capital accounts.

Working capital requirements will likely be met by financing anticipated to be obtained through MonticelloAM, LLC <sup>1</sup> or one of its affiliates and/or other institutions of similar caliber in an amount exceeding 90 days of working capital. Working capital includes both operations and the referenced facility improvements.

In addition, the Grantors of the Trusts, which indirectly own the Operator Entity have jointly and severally agreed to fund the Trusts as needed up to an amount of \$5 million per facility for any unmet working capital requirements. See response to **MHCC Question 11** below.

10. There was no question 10 provided by MHCC.

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<sup>1</sup> <https://monticelloam.com/about/>

- 11. The CPA letter provided, Exhibit E, which states each facility has access to cash to fund “capital needs,” not to exceed \$5 million. Describe in detail what capital needs include and whether the \$5 million is for each individual facility.**

**Response:** As noted in response to Question 9 above, \$5 million is for each individual facility and encompasses both capital expenditures for renovations and working capital needs, to the extent there are any needs beyond borrowed funds to be provided through Monticello or a similar lending agency. The \$5 million encompasses the amount referred to as the commitment of Grantors of the Trusts to fund the Trusts set forth in Response Number 9 and there should be adequate residual to fund any immediate capital projects.

- 12. Please provide the amount of debt for each facility in the transaction, the amount that is being financed and by whom, the organization or individual who is lending related to the debt associated with each transaction, and any collateral that is being used for loans associated with each transaction.**

**Response:** See response to Question 9. The purchase price is just for the Real Estate. Please refer to the RE applications (Question 35) for details on financing and debt. It is anticipated that financing for working capital needs will be obtained through Monticello and/or other institutions of similar caliber, in an amount up to \$80 million which will be secured by receivables and other assets of the operators. Likewise, the Grantors of the Trusts that indirectly own the Operator Entity have agreed to provide up to \$5 million per facility as previously detailed, to the extent the foregoing does not timely occur or is inadequate for the facility needs.

## Quality

- 13. Describe in detail any staffing changes implemented by Jack Shelby at other facilities following the initiation of his management or control over those facilities, including staffing ratios for RNs, LPNs, and total nursing hours (including weekends) per patient day, before and after the initiation of his management or control over those facilities.**

**Response:** Jack Shelby believes that it is important for the day-to-day control of the facilities to be in the hands of the Nursing Home Administrator and other licensed staff. Jack Shelby helps to ensure that resources are made available to the Nursing Home Administrators before he decides to invest as an individual or to accept assignment on behalf of trusts. Those resources include the consultants and vendors disclosed. Staffing ratios, nursing hours, shift-by-shift and unit-by-unit are facility specific and determined by the Nursing Home Administrator in consultation with their staff and any others desired, based upon census, acuity and other variables identified by the foregoing. Please see [Attachment P](#) for information available in CMS quality databases.

14. Provide the post-acquisition admissions/readmissions data for the Florida and Texas nursing homes owned or previously owned by Jack Shelby for the past 5 years.

**Response:** Please see [Attachment Q](#) for information available on CMS quality databases.

15. Describe in detail any change to the negotiated rates with commercial payers after the acquisition of the Florida and Texas nursing homes owned or previously owned by Jack Shelby. This should include the percentage change in negotiated rates one and two years after acquisition.

**Response:** Jack Shelby does not track this information

16. The application included a quality analysis for the Texas facilities owned or affiliated with Jack Shelby. Provide the same analysis for the Florida facilities owned or affiliated with Jack Shelby including each facility's overall rating based on the most recent CMS 5-star quality rating system from September 2024 to September 2025, dates of quarterly QA meetings, and documentation of the percentage COVID/Flu and Pneumonia vaccines to both residents and staff.

**Response:** Please see [Attachment R](#).

17. Describe in detail any quality improvement initiatives and activities implemented by Jack Shelby at other facilities following initiation of his management or control of any facilities who received three stars or below - either prior to initiation of his management/control or following - on any health inspections, staffing, and quality measures rating of the CMS Nursing Home Compare 5 Star Quality Rating Program.

**Response:** Please see response in Question 13. The foregoing said the facilities have made improvements including but not limited to, that which is set forth in [Attachment S](#).

18. Do the facilities being acquired currently accept patients after hospital discharge who have more complex care needs, including individuals with requirements for regular intravenous infusions, peripherally inserted central catheters (PICC), nasogastric tubes, gastric tubes, total parenteral nutrition, hemodialysis, peritoneal dialysis, or regular wound care requirements? After the proposed acquisition, will the facilities accept patients after hospital discharge for complex care needs such as those listed?

**Response:** The facilities currently do accept and new owners intend to continue to do so post-acquisition subject to necessary resources being available to appropriately care for such residents. Many of the foregoing, are categorized as yellow on a green, yellow, red scale. This means that clinical review may be necessary to determine whether such admission is appropriate given the then known factors at the facility. The establishment of a review system and such review is the responsibility of the Facility Staff.

## Trusts

### 19. Describe in detail any role that Jack Shelby will have in each acquired facility.

**Response:** In addition to that set forth above, Jack Shelby as Trustee or in his individual capacity when he is an ultimate owner, is responsible for all corporate functions relating to such ownership interest. He likewise can, and will, vote his ownership share on any ownership votes. He will not manage the day-to-day operations. In the cases of all but the Shelby Facilities, there is an intervening corporate manager of the Holdco (as described in response to Question 6) that likewise does not manage day-to-day operations but rather is responsible for approving the initial Governing Body of the facilities. Day-to-day operations is the function of the Administrator.

In his various roles he selects and/or approves the professionals utilized and has signing authority. He also attempts to convey the importance of patient focused quality care and ownership's desire for the same. On the facilities that he manages, he shall also approve the Governing Body. See response to Question 8 for Governing Body membership.

### 20. Detail how many nursing home acquisitions Jack Shelby has been involved with in the past 10 years and how long he was involved in each facility before selling it.

**Response:** See a list in [Attachment T](#).

### 21. Have any of the facilities disclosed in the above question filed for bankruptcy, and if so which ones?

**Response:** No

### 22. Provide complete, unredacted copies of the Trust instruments and any other documents between the Trusts and the facilities.

**Response:** See in [Attachment U](#).

### 23. Describe in detail any Trust involvement in any capital investment or assistance with operating costs and whether any Trust will impose any targets that the facilities must meet as a condition of capital or other investments in the facilities.

**Response:** There are no targets that must be met as a condition of investment. Like all businesses it is hoped it will be self-supporting, but resident care is first and foremost.

### 24. Please identify any legal relationship Meir Silberberg (owner of Hallmark Health Consulting Services, LLC), has with any of the SGN Healthcare Trust Beneficiaries?

**Response:** The beneficiaries are Meir Silberberg's children.

25. Please identify any legal interest of any individual trustees in any of the organizations expected to provide services at the facilities, or receive payments from the facilities in any way? If so, please explain.

**Response:** Perry Dinter works at an accounting firm that may provide tax advice and or assistance with filing of returns for the operating entities. It is not anticipated that other Trustees will receive payments for services provided.

## Requests for Waivers

26. Provide the average daily census for the 10 CommuniCare facilities that have rooms with more than two residents per room and are requesting waivers.

**Response:** The following table provides licensed beds, average daily census, and percentage occupancy for year to date September 30, 2025.

**Table 1. Average Daily Nursing Home Census 10 CommuniCare Facilities Requesting Waivers**

CCN	County	CommuniCare Facility	Lic Beds (a)	Average Daily Census YTD 9/30/2025 (b)	Percent Avg Annual Occupancy YTD 9/30/2025 (c)
215340	Baltimore City	Blue Pointe Healthcare Center	135	125	89.9%
215231	Prince George's	Clinton Healthcare Center (c)	267	202	75.7%
215055	Allegany	Cumberland Healthcare Center (d)	134	107	80.1%
215183	Baltimore	Fayette Health and Rehabilitation Center	156	130	84.1%
215020	Prince George's	Forestville Healthcare Center	162	153	94.1%
215336	Washington	Hagerstown Healthcare Center	140	112	79.8%
215138	Anne Arundel	Marley Neck Health and Rehabilitation Center	95	90	93.0%
215346	Baltimore City	Northwest Healthcare Center	91	83	91.0%
215268	Carroll	Pleasant View Healthcare Center	104	73	70.2%
215094	Carroll	Westminster Healthcare Center	158	113	71.8%

Source:

- CMS 2022 Cost Report
- C. Stoltz, CommuniCare, CFO email
- CommuniCare operates only 221 beds. It decided not to act on a Waiver to move 46 beds.
- 150 total beds at 9/30/24, 134 SNF, 16 beds ALF

**27. All applicants did not include Attachment H. Please provide the consolidated balance sheets for each facility asserting financial distress, detailing all revenue sources and expenditures for the last three years.**

**Response:** **Cumberland** and **Westminster** facilities are in financial distress. **Attachment H** in the original applications provides the P&L for Cumberland and Westminster, the only facilities asserting financial distress. **Attachment V** to these responses provides the balance sheets for these two facilities.

**28. Please provide any documentation of project bids or estimates obtained for construction work to eliminate the number of triple and quadruple rooms or any other efforts to document compliance with the requirement to eliminate multi-bedded rooms?**

**Response:** **Attachment G** in each original application documents the systematic process that GutVan architects used to evaluate each facility, as well as the regulations and guidelines considered in the evaluations (**Attachment G** page 1). At this stage in the proposed transaction, it would be premature to have bids or the level of architecture and engineering documents necessary to obtain dependable construction estimates.

Response to Question 9 describes plans for loans to complement owner equity should planned renovations require additional funds.

**29. Provide any documentation or evidence of resident placement delays that have occurred due to bed availability, such as a waitlist.**

There are no present records of resident waits or delays available from the seller. As noted in Table 1 above, **four** waiver-request facilities, Blue Point, Forestville, Marley Neck, and Northwest are operating at or above 85 percent annual average occupancy.

Maryland Population Data show county populations over age 65 increasing. As illustrated in a 2024 report, the median age in counties where these ten facilities are located was at or above 39 in 2024<sup>2</sup>. MHCC reports<sup>3</sup> show that nursing home use rates among people over 65 are three- to ten-fold higher than other age groups. The ten facilities will need capacity to absorb future demand. According to the 2024 population estimates report:

*By 2024, the share of older adults aged 65 and above increased from 15.8% in 2020 to 17.6% in 2024, reflecting the aging of the Baby Boom generation...*

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<sup>2</sup> Source: Maryland Department of Planning  
[https://planning.maryland.gov/MSDC/Documents/Trends\\_Report/Population\\_Estimates\\_Report\\_AGR.pdf](https://planning.maryland.gov/MSDC/Documents/Trends_Report/Population_Estimates_Report_AGR.pdf)

<sup>3</sup> Trends in Statewide Comprehensive Care Use Rates per 1,000 Population by Jurisdiction of Residence and age Group, Maryland 2019-2021, MHCC website

**Table 1. Median Ages in Maryland and its Jurisdiction, 2020–2024**

State/ Jurisdictions	July 1, 2020	July 1, 2021	July 1, 2022	July 1, 2023	July 1, 2024
<b>Maryland</b>	<b>39.0</b>	<b>39.3</b>	<b>39.4</b>	<b>39.6</b>	<b>39.7</b>
Allegany County	42.1	41.8	41.7	41.6	41.6
Anne Arundel County	38.5	38.6	38.8	39.0	39.2
Baltimore County	39.3	39.5	39.6	39.8	39.9
Calvert County	40.5	40.4	40.4	40.7	41.0
Caroline County	40.1	40.1	40.0	40.0	39.7
Carroll County	41.7	41.5	41.4	41.3	41.6
Cecil County	40.7	40.8	40.7	40.8	40.8
Charles County	38.6	38.6	38.8	39.1	39.3
Dorchester County	44.9	44.8	44.8	44.6	44.6
Frederick County	39.0	38.9	38.9	39.1	39.4
Garrett County	47.1	47.3	47.7	48.0	48.1
Harford County	40.5	40.5	40.6	40.9	41.2
Howard County	39.0	39.3	39.6	39.9	40.3
Kent County	48.8	48.7	49.1	49.2	49.2
Montgomery County	39.8	40.2	40.4	40.6	40.8
Prince George's County	38.0	38.4	38.7	38.9	38.9
Queen Anne's County	44.5	44.4	44.6	44.8	44.8
St. Mary's County	37.0	37.1	37.3	37.5	37.7
Somerset County	38.5	38.5	38.4	38.2	38.0
Talbot County	50.4	50.7	50.7	50.7	50.6
Washington County	40.6	40.6	40.5	40.6	40.5
Wicomico County	36.2	36.2	36.1	36.1	36.1
Worcester County	50.6	50.5	51.0	51.2	51.3
Baltimore City	35.9	36.1	36.2	36.4	36.5

Note: Data from the U.S. Census Bureau's Population Estimates Program were utilized.  
[https://planning.maryland.gov/MSDC/Pages/s2\\_estimate.aspx](https://planning.maryland.gov/MSDC/Pages/s2_estimate.aspx)

**30. If a waiver is denied, how will the acquiring entities address the elimination of the triple and quadruple bedrooms at the facilities?**

**Response:** Denial of the requested waivers would cause financial hardship related to the loss of value in the acquisition. As new owners absorb operations and learn more about the Maryland nursing home environment, they may find other opportunities for distributing and/ or consolidating beds in a way that would not harm patients or communities. For reference, the following table shows requested multi-bed waivers, number of such beds after purchase, and current Medicaid use. In **Fort Washington**, the applicants propose to **eliminate all multi-occupancy rooms**. No waiver is requested for that facility.

In **six facilities**, the acquiring entities propose to reduce the cumulative total beds in multi-bed rooms by 129 (694 current less 565 remaining). In **four facilities, Forestville, Marley Neck, Northwest and Pleasant View**, architects could not find a way to accommodate more bedrooms within the current building envelope or on the site.

**Table 2. Requested Changes in Multi-bedded Rooms Following Acquisition**

CCN	CommuniCare Facility	Lic Beds (a)	No. Beds in Rooms w/>2 occupants 2025 (b)	Waiver Beds Requested (Net Beyond 2 per Room) (c)	No. beds remaining in multi-occupancy rooms (d)	Percent Medicaid 2025 (e)
215340	Blue Point Healthcare Center	135	64	15	45	86.2%
215231	Clinton Healthcare Center	267	123	35	105	86.6%
215055	Cumberland Healthcare Center	134	23	7	15	91.5%
215183	Fayette Health and Rehabilitation Center	156	56	12	48	81.4%
215020	Forestville Healthcare Center (f)	162	93	31	93	79.1%
215336	Hagerstown Healthcare Center	140	48	12	36	81.2%
215138	Marley Neck Health and Rehabilitation Center (f)	95	8	4	8	54.3%
215346	Northwest Healthcare Center (f)	91	33	13	33	88.2%
215268	Pleasant View Healthcare Center (f)	104	104	52	104	91.6%
215094	Westminster Healthcare Center	158	94	26	78	75.3%
215146	Fort Washington	150	48	0	0	NA
	<b>Total</b>	<b>1,592</b>	<b>694</b>	<b>207</b>	<b>565</b>	

Note:

- a. Licensure Documents provided to applicants
- b, c, d. Part IV, page 12, original applications
- e. CommuniCare internal data
- f. Facility or site constraints preclude bedroom expansion.

The remainder of this response is best answered facility by facility.

Of the ten requested waivers, only Westminster and Pleasant View operated below 80 percent average annual occupancy in 2025 (Table 1 above). Other issues justify keeping those multi-room beds.

- Westminster operated at a loss for the past few years. The acquiring entity proposes to reduce the number of beds in multi-bed rooms. However, dropping licensed capacity by 26 more beds would leave Carroll County with a deficit of nursing home beds. According to the *MHCC Bed Need Projections for Target Year 2022<sup>4</sup>*, Carroll County surplus was only 33 beds in 2022. Census data show the number of people over 65 has increased significantly since then, so by extension, the bed deficit has increased. The applicant respectfully requests the Commission to accept the waiver request based on financial hardship and county nursing home bed need.

<sup>4</sup> Maryland Register, Vol 46, Issue 29, Friday, September 2, 2019, p 875

- Denial of the 52-bed waiver request for Pleasant View, as well. would also leave Carroll County with a severe deficit of nursing home beds, according to the *MHCC Bed Need Projections for 2022*. As noted, that report showed the county surplus was only 33 now four years ago. Pleasant View and Westminster provide critical capacity. The applicant respectfully requests the Commission to accept the waiver request based on Carroll County nursing home bed need.

With seasonal fluctuations, two of the waiver facilities need the full licensed bed complement to meet patient demand. Taking beds from those facilities could mean turning patients away during peak seasons

- Denial of Marley Neck would leave the facility with little capacity to manage turnover. The facility operates at 90 percent occupancy, a surplus of only five beds. The applicant is requesting a waiver of only four beds. Removing those four beds would put Marley Neck close to 100 percent occupancy. The applicant respectfully requests the Commission to accept the waiver request based on resident need.
- Denial of Forestville would leave the facility with little capacity to manage turnover. It operates at 94 percent occupancy, a surplus of only nine beds. The applicant is requesting a waiver for 31 beds. Removing 31 beds would put Forestville over 100 percent occupancy, requiring staff to discharge patients. Forestville is in Prince George’s County, where MHCC found a deficit of Nursing Home beds in 2022<sup>5</sup>.The applicant respectfully requests the Commission to accept the waiver request based on resident need.

Denial in three others would leave the jurisdictions with bed shortages.

- Clinton is also in Prince George’s County where MHCC found a deficit of Nursing Home beds in 2022<sup>6</sup>. If MHCC denies the 35-bed waiver request in Clinton, the jurisdiction will have a severe shortage of beds.
- Cumberland operated at a loss for the last three years. It has high Medicaid occupancy (91 percent). This is far more than the Required Medicaid Participation Rate of 56.4 percent. The buyer proposes to reduce the number of beds in multi-person rooms by eight. The waiver request is only 7 beds. However, even this small reduction would reduce the facility’s surge capacity. Site and facility constraints prevent further renovation or physical additions that would reduce the multi-bed rooms. Allegany County median age is 41+. The applicant respectfully requests the Commission to accept the waiver request based on both financial hardship and county need for Medicaid access.
- Denial of the 12-bed waiver request at Hagerstown would take the facility to 128 beds and average annual occupancy to 87 percent. The acquiring entities propose to reduce multi-room occupancy by 12 beds. The building envelope and side do not lend themselves to further reduction. MHCC Bed Need Projections for 2022 show the county with 131 Temporarily Delicensed Beds. The same table shows those delicensed beds reduced the available inventory to what the county needed in 2022. Washington County is growing and its median age is over 40. Buyers respectfully request a waiver for the remaining 12 based on patient access.

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<sup>5</sup> Ibid

<sup>6</sup> Ibid

In three others, denial could force discharges of current residents.

- Denial of the request to waive 13 beds for Northwest would put current occupancy over 100 percent and require discharge of current residents. Such denial may also require the new owner to reduce Medicaid occupancy to offset the higher cost associated with fewer rooms. Medicaid beneficiaries represent more than 80 percent of residents. The applicant respectfully requests the Commission to accept the waiver requests to preserve resident and Medicaid access.
- Denial of the 15-bed request for Blue Point would put current occupancy over 100 percent and require discharge of current residents. Such denial may also require the new owner to reduce Medicaid occupancy to offset the higher cost associated with fewer rooms. Medicaid beneficiaries represent more than 80 percent of residents. The applicant respectfully requests the Commission to accept the waiver requests to preserve resident and Medicaid access.
- Denial of the 12-bed request for Fayette may require the new owner to reduce Medicaid occupancy to offset the higher cost associated with fewer rooms. Medicaid beneficiaries represent more than 80 percent of residents. The applicant respectfully requests the Commission to accept the waiver requests to preserve Medicaid access.

## Real Estate

**31. Provide a copy of the lease agreement(s) and any other agreements between the applicants and the proposed real property owners. The documents should show the terms of the lease, charges/rent cost, the time frame, and any provisions that describe any circumstances that allow the terms of the lease to be changed.**

**Response:** See [Attachment W](#).

**32. Describe in detail any overlapping ownership between the proposed real property purchasers and the proposed bed rights owners, operatorships, and management companies of the nursing homes to be acquired.**

**Response:** There are no Management Companies. That being said there are administrative services that are provided by consultants, see the organizational charts [Attachment O](#). While there is some limited overlap of trustees who have ownership of the Real Estate and Operating Entities -more specifically Summit Lane Trust, AFH MD Irrevocable trust and SGN Healthcare Trust and MD Silver Family Trust, the Trustees do not have any ownership or control over the administrative services companies.

## Questions/Additional Information Previously Asked For and Not Answered

**33. Commission staff requested Apex Global Solutions organizational chart.**

**Response:** Please see response to question 6.

**34. The submission on Friday December 12, 2025, stated that two real property affidavits were missing for Dovid Y Kleiner and Sloans Lake Trust. Additionally, Commission staff cannot locate affidavits for Michael Meisner, Summit Lane Trust, and AFH MD Irrevocable Trust.**

**Response:** The Affidavits for Dovid Y Kleiner and Sloans Lake Trust were subsequently provided. An affidavit was not previously provided for Michael since his interest in the Propco is below 5%. That being said, please find Michael's affidavit attached in **Attachment X**. Please also note that while ownership percentages are minimal, Summit Lane Trust and AFH MD Irrevocable Trust do have overlap and therefore cannot provide such an affidavit.

**35. No real property applications were received, only the affidavits for most of the real property owners. A separate real property application is required for the real property purchasers even if they are real property only.**

**Response:** The Real Estate entities are in the process of composing their applications and will forward under separate cover.

**36. No response was received about redacting any parts of the application.**

**Response:** We ask the Department to please redact all financial statements, the price paid to vendors and all other financial, private, privileged, or confidential commercial information. Proposed redacted versions of the application will be provided under separate cover.

**37. There was no confirmation that the acquiring entities will post their organizational charts at the facilities with their notice.**

**Response:** The Operator's Organizational Chart has been posted.

## Attachments

Attachments for this set of completeness questions are lettered consecutively from the original Applications; however, page numbering is independent, beginning at 501.

I. Dynamic Precision Services .....	501
J. Operation Transfer Agreements .....	504
K. CommuniCare Administrative Services FAQs.....	552
L. Posted Notices.....	561
M. Anticipated Vendor Contracts .....	580
N. Specimen Contracts: APEX Global Solutions LLC; Health Consulting Services; Hallmark Health Consulting Services.....	582
O. Revised Organizational Charts: Health Consulting Services and Hallmark Health Consulting Services .....	667
P. CMS Database Reports on Staffing: Other Jack Shelby Facilities, 5 Years .....	670
Q. CMS Database Reports on Admissions and Readmissions: Jack Shelby Facilities, 5 Years .....	673
R. Quality Analysis: CMS Star Ratings, Judgements, Deficiencies – Jack Shelby Florida Facilities.....	676
S. Quality Improvement Plans: Jack Shelby Florida Facilities 3 Stars and Below.....	680
T. Jack Shelby Acquisitions, 10 Years .....	692
U. Trust Instruments for Each Application for Monies Provided to PropCo and/or OpCo .....	696
V. CommuniCare P&L and Balance Sheets: Cumberland and Westminster.....	978
W. Lease Agreements, Future OpCo and PropCo .....	981
X. Michael Meisner Affidavit: Not Involved in Operating Companies .....	1572

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# Attachment I

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### **Chow Application Assistance**

- Assist operator in filling out any state filings needed for a Change in Ownership application
- Coordinate with Operator and other consultants to file Medicaid and Medicare provider agreements

### **MDS Part A Accuracy Review:**

#### Commencement of Service:

- Perform Accuracy reviews on Medicare Part A '5 day' and 'IPA' assessments.
- Follow up with MDSC to ensure appropriate follow through.
- Provide education to MDS staff as needed on PDPM compliance and accuracy.
- Have meetings with Regional MDS consultants and Operations Consultants as needed to discuss progress.

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### **Quality Program Review:**

#### Commencement of Service:

- Perform Accuracy reviews on MDS assessments as pertaining to QIP.
- Follow up with MDSC to ensure appropriate follow through.
- Provide education to MDS staff as needed on QIP compliance and accuracy.
- Assist MDSC in an effective QIP and SOC process, as needed.
- Have meetings with Regional MDS consultants and Operations Consultants as needed to discuss progress.
- Provide formal education to IDT teams on QIP systems and management, as needed.

### **Marketing Consulting:**

#### Commencement of Service:

- Review and monitor Google reviews.
- Assist and guide all facilities to conduct community events.
- Will compile new orientation packets for all Admission departments.
- Initiate and monitor customer service plans implemented by the facility administrator.
- Attend weekly conference calls.
- Presentations for insurance companies
- Working with all insurance companies to obtain contracts for the facilities.
- Mystery calls to the facilities with a full report of the findings.
- Creating niche programs.
- Upon request will present facility overview to insurance and HMO companies.
- Will assist in any area of ACO/PPN as requested by operator.
- Conduct all in-servicing via Zoom to all pertinent and applicable personnel to improve quality of care and services of a LTC setting.
- Discharge customer satisfaction survey phone calls.

1. Review potential high-risk incidents, including:

- a. identification of clinical concerns (i.e., delay in care or evaluation, lack of follow-up for change in condition, discrepancies between orders and consultant recommendations, omissions in MAR/TAR sign-off, lack of provider/RP notification, missing or incomplete care plans/updates, etc.)
  - b. identification of gaps in Company investigations (i.e., missing statements, timeline discrepancies, training, audits, plans of correction, etc.); and
  - c. recommendations for immediate updates and Company/account-wide process improvements to help prevent recurrence and meet Company compliance obligations.
2. Support Company's creation of a soft file in anticipation of potential litigation and/or administrative/regulatory action.
3. Review "reportable documentation" (for the purpose of this paragraph "reportable documentation" is defined as documentation that is required to be submitted to governmental regulatory bodies (i.e., adverse events, allegations of neglect, abuse, mistreatment, or misappropriation, etc.)) and advise, if applicable, regarding potential modifications to Company policies and procedures to assist with future regulatory compliance.
4. Assist with identification of compliance concerns and collaboration with Company leadership to correct.
5. Collaborate with third-party corporate compliance and legal teams (e.g., Rytes, The Humphrey Law Group, etc.) and Company leadership in addressing potential, high-risk events and litigation.
6. Assist with "track and trend" to monitor and analyze various data sources to identify and understand emerging trends, patterns, or shifts in key resident care (i.e., frequent fallers, multiple wounds, frequent infections, etc.).
7. Review resident or family grievances on a monthly or as needed basis and advise, if applicable, regarding potential modifications to Company clinical measures and processes.
8. Perform medical record review upon written request by Company.
9. Perform EHR audits.
10. Perform on-site visits to help support clinical processes, communication, documentation, and survey readiness.
11. Perform monthly trend review for QAPI (i.e., trending of incidents, falls, wounds, review of reportable events, review of incident process, auditing, etc.)
12. Provide education series/webinars to assist with enhancing clinical measures and processes.

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## **Attachment J**

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# Attachment K

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## **Concourse FAQs**

### **Will you be reducing our salary or base hourly wage?**

NO!! We fully recognize and appreciate the fact that your salary or base hourly wage is extremely important to you and has been earned through hard work, dedication, and grit. We have no plans to make any changes to your current salary or base hourly wage.

### **Do I have job security?**

We have tremendous respect for the All-Star team that Communicare has built, and we are honored and feel privileged to have the opportunity to continue to work with such a great team for many years to come. At this time we have no intentions to conduct any immediate layoffs or a reduction in force.

### **Are you looking to replace Communicare staff?**

NO! As everybody knows, it is hard to find talent these days and we do not have a bus full of replacement staff waiting to come in and work. And even if we did, they aren't **you**; a skilled and experienced group. We very much want to work with and retain everybody. Accordingly, at this time we have no intentions to conduct any immediate layoffs or a reduction in force.

### **Will my health insurance network be changing significantly and will I have to change my doctor?**

No, we utilize a health insurance system with a comparable network that you currently enjoy. While we cannot guarantee a specific doctor will be in network within our health insurance program, we hope to keep as much continuity between the two different insurance plans, as possible.

### **Will you be looking to change all of our current processes and systems?**

Largely no, we are certainly NOT looking to make many invasive changes, as we do have tremendous respect for Communicare as a company. At the same time, we are forward thinking and collaborative. Therefore, we will be open to feedback if the team has certain systems and processes that they were looking to change and we are hoping you'll be open as well if we see a clear advantage of making a shift in one particular

system/process or another. Also, we may simply switch a few key regional employees from one region to another if they are interested in doing so.

**Will I be able to keep seniority regarding PTO etc?**

Yes, that is absolutely our intention at this point in time.

**Will we have the opportunity to meet with you in person before the transition?**

Absolutely. We plan to come in person to each facility over the coming days to introduce ourselves. We would love for all department heads, key personnel, and honestly anybody who wants to, to meet with us when we come in person. We are looking very forward to meeting with you.

**If I have additional questions, who do I reach out to?**

We are happy to answer any and all questions that may come up. Feel free to email questions to: [Questions@HealthCS.Com](mailto:Questions@HealthCS.Com)

**Will we have a chance to voice things we want to improve?**

ABSOLUTELY! We value your opinion and perspective. Please do share areas you identify as opportunities for improvement.

**Will you allow us to remain in the Concourse Office?**

We recognize that this is the office you are used to and enjoy, and therefore, we intend to extend the lease of this office. This will also give you the opportunity to continue collaborating with each other even if you are tasked with covering new regions in MD.

**What is your general business plan?**

Our top priority is delivering exceptional, high-quality care to our residents while creating a positive, supportive work environment for our employees. We strive to be a valuable resource to the communities we serve.

**When is the effective date for this change?**

As of now, we will assume operation of the facilities in February 2026. Everything will remain as is until then. Rest assured, we have begun working earnestly to ensure all systems are in place for a smooth transition.

### **What would you say to those worried about staying on board for this transition?**

Give us a shot. We are very driven to make this work well for all of you. You have nothing to lose by staying on board with us and seeing how things go, and importantly, you have so much to gain by doing so.

### **Do I need to complete new hire paperwork, application, HR forms etc.?**

Yes, over the coming weeks we will provide these documents.

### **How about other benefits?**

We have a robust benefit package that we are proud of. We are actively working with our carriers to roll out the details to you for the MD benefit package within the coming weeks.

### **Will blue dollars continue?**

Any facility programs that you feel are working well, such as blue dollars, etc., we are excited about and our intention at this time is to continue them, whenever possible.

### **Will the entire Regional Team be retained?**

Yes, absolutely. We are excited about the talent within the Regional Team and fully plan to retain every single member. Your expertise is highly valued, and this acquisition is fundamentally about building on your success.

While some Regional Team members will be reassigned to strategically cover different regions, we want to emphasize that everyone has job security.

We have developed a preliminary regional assignment plan, and a tremendous amount of thought has gone into identifying the regions that will set each of you up for the greatest success. This plan is still under careful review and will be finalized after further consideration. The core commitment is this: Your job is secure, and we are focused on

making the most strategic placements for our collective future. At this time we have no intentions to conduct any immediate layoffs or a reduction in force.

**In terms of region, please note:**

- **Health Consulting Services** will be overseeing the Potomac region: Clinton, Kensington, Silver Spring, Ft. Washington, Anchorage, Forestville + South River & Marley Neck.
- **Hallmark Health Consulting Services** will be overseeing the Metro region: Blue Point, Holly Hill, Fayette, Laurelwood, Ellicott, NW.
- **Prime Healthcare Management** will be overseeing Hagerstown, Pleasant View, Westminster, and Cumberland.

*Please note, all items listed in the FAQs expresses our intention at this time and are not legally binding*

## **Facility FAQs**

### **Will you be reducing our salary or base hourly wage?**

NO!! We fully recognize and appreciate the fact that your salary or base hourly wage is extremely important to you and has been earned through hard work, dedication, and grit. We have no plans to make any changes to your current salary or base hourly wage.

### **Do I have job security?**

We have tremendous respect for the All-Star team that Communicare has built, and we are honored and feel privileged to have the opportunity to continue to work with such a great team for many years to come. At this time we have no intentions to conduct any immediate layoffs or a reduction in force.

### **Are you looking to replace Communicare staff?**

NO! As everybody knows, it is hard to find talent these days and we do not have a bus full of replacement staff waiting to come in and work. And even if we did, they aren't **you**; a skilled and experienced group. We very much want to work with and retain everybody. Accordingly, at this time we have no intentions to conduct any immediate layoffs or a reduction in force.

### **Will my health insurance network be changing significantly and will I have to change my doctor?**

No, we utilize a health insurance system with a comparable network that you currently enjoy. While we cannot guarantee a specific doctor will be in network within our health insurance program, we hope to keep as much continuity between the two different insurance plans, as possible.

### **Will you be looking to change all of our current processes and systems?**

Largely no, we are certainly NOT looking to make many invasive changes, as we do have tremendous respect for Communicare as a company. At the same time, we are forward thinking and collaborative. Therefore, we will be open to feedback if the team has certain systems and processes that they were looking to change and we are hoping you'll be open as well if we see a clear advantage of making a shift in one particular

system/process or another. Also, we may simply switch a few key regional employees and employee teams from one region to another if they are interested in doing so.

**Will I be able to keep my seniority regarding PTO etc?**

Yes, that is absolutely our intention at this point in time.

**Will we have the opportunity to meet with you in person before the transition?**

Absolutely. We plan to come in person to each facility over the coming days to introduce ourselves. We would love for all department heads, key personnel, and honestly anybody who wants to, to meet with us when we come in person. We are looking very forward to meeting with you.

**If I have additional questions, who do I reach out to?**

We are happy to answer any and all questions that may come up. Feel free to email questions to: [Questions@HealthCS.Com](mailto:Questions@HealthCS.Com)

**Will we have a chance to voice things we want to improve?**

ABSOLUTELY! We value your opinion and perspective. Please do share areas you identify as opportunities for improvement.

**What is your general business plan?**

Our top priority is delivering exceptional, high-quality care to our residents while creating a positive, supportive work environment for our employees. We strive to be a valuable resource to the communities we serve.

**When is the effective date for this change?**

As of now, we will assume operation of the facilities in February 2026. Everything will remain as is until then. Rest assured, we have begun working earnestly to ensure all systems are in place for a smooth transition.

**What would you say to those worried about staying on board for this transition?**

Give us a shot. We are very driven to make this work well for all of you. You have nothing to lose by staying on board with us and seeing how things go, and importantly, you have so much to gain by doing so.

### **Do I need to complete new hire paperwork, application, HR forms etc.?**

Yes, over the coming weeks we will provide these during our 2nd employee meetings and extra packets will be available in your HR department. We will be discussing and reviewing all documentation that needs to be completed during this meeting and will be releasing a concrete timeline shortly.

### **How about other benefits?**

We have a robust benefit package that we are proud of. We are actively working with our carriers to roll out the details to you for the MD benefit package within the coming weeks.

### **Will blue dollars continue?**

Any facility programs that you feel are working well, such as blue dollars, etc., we are excited about and our intention at this time is to continue them, whenever possible.

### **Will the entire Regional Team be retained?**

Yes, we absolutely plan to retain the entire regional team. Some Regional Team members will switch to cover different regions, however, they will all remain on board and be available to answer questions, give guidance, etc to all regions that require their assistance. At this time we have no intentions to conduct any immediate layoffs or a reduction in force.

### **In terms of region, please note:**

- **Health Consulting Services** will be overseeing the Potomac region: Clinton, Kensington, Silver Spring, Ft. Washington, Anchorage, Forestville + South River & Marley Neck.
- **Hallmark Health Consulting Services** will be overseeing the Metro region: Blue Point, Holly Hill, Fayette, Laurelwood, Ellicott, NW.
- **Prime Healthcare Management** will be overseeing Hagerstown, Pleasant View, Westminster, and Cumberland.

**When will HCS be visiting our facility to introduce yourselves in person:**

Tuesday

Silver Spring Healthcare Center - 10AM

Kensington - 11:20

Forestville - 1PM

Clinton -2:30

FT Washington - 4PM

Wednesday

Marley Neck - 10AM

South River - 12PM

Anchorage - 3PM

**All of these FAQs only apply to Facilities' non-union employees**

*We recognize the union but do not adopt or assume the terms of the existing collective bargaining agreement (CBA). For our union-represented employees, we greatly respect the collective bargaining process and look forward to engaging together through that established framework.*

*Please note, all items listed in the FAQs expresses our intention at this time and are not legally binding*

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# Attachment L

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## NOTICE TO EMPLOYEES, RESIDENTS AND RESIDENT REPRESENTATIVES

Date: **December 29, 2025**

Dear Employees and Residents of Anchorage Healthcare Center:

This notice is to inform you that 105 Times Square RE LLC plans to become the owner of the land and building of this nursing home. Anchorage Nursing and Rehab Center LLC plans to become the owner of the operations and beds rights of this nursing home. This change is scheduled to happen on **March 1, 2026**.

Anchorage Nursing and Rehab Center LLC is honored to assume operations of this facility. We are committed to working hand-in-hand with the dedicated employees to uphold the highest standards of care, while fostering an environment that is welcoming and supportive for both residents and staff. Above all, we recognize the importance of ensuring continuity of care throughout this transition. We look forward to building upon the strong foundation already in place and are excited to meet each of you soon.

105 Times Square RE LLC and Anchorage Nursing and Rehab Center LLC asked the Maryland Health Care Commission, <https://mhcc.maryland.gov/>, to approve this change of ownership.

You have the right to submit comments about this planned change to the Commission.

**Your comments must be received by January 30, 2026**

Send all comments to:  
Maryland Health Care Commission  
[mhcc.confilings@maryland.gov](mailto:mhcc.confilings@maryland.gov)  
4160 Patterson Ave  
Baltimore, MD 21215  
410-764-3460

New Ownership Contact Information:

Jack Shelby, Authorized Official  
Health Consulting Services, Admin Services  
Phone: 18555571427  
Email: [questions@healthcs.com](mailto:questions@healthcs.com)  
Address: 2850 Quarry Lake Drive Baltimore MD 21209

## **NOTICE TO EMPLOYEES, RESIDENTS AND RESIDENT REPRESENTATIVES**

Date: **December 29, 2025**

Dear Employees and Residents of Blue Point Healthcare Center:

This notice is to inform you that 2525 West Belvedere Ave LLC plans to become the owner of the land and building of this nursing home. Blue Point Nursing and Rehab Center LLC plans to become the owner of the operations and beds rights of this nursing home. This change is scheduled to happen on **March 1, 2026**.

Blue Point Nursing and Rehab Center LLC is honored to assume operations of this facility. We are committed to working hand-in-hand with the dedicated employees to uphold the highest standards of care, while fostering an environment that is welcoming and supportive for both residents and staff. Above all, we recognize the importance of ensuring continuity of care throughout this transition. We look forward to building upon the strong foundation already in place and are excited to meet each of you soon.

2525 West Belvedere Ave LLC and Blue Point Nursing and Rehab Center LLC asked the Maryland Health Care Commission, <https://mhcc.maryland.gov/>, to approve this change of ownership.

You have the right to submit comments about this planned change to the Commission.

**Your comments must be received by January 30, 2026.**

Send all comments to:  
Maryland Health Care Commission  
[mhcc.confilings@maryland.gov](mailto:mhcc.confilings@maryland.gov)  
4160 Patterson Ave  
Baltimore, MD 21215  
410-764-3460

New Ownership Contact Information:  
Jack Shelby, Authorized Official  
Hallmark Health Consulting Services, Admin Services  
Phone: (973) 944-0113  
Email: [questions@hallmarkhealthcs.com](mailto:questions@hallmarkhealthcs.com)  
Address: 400 Rella Blvd, Suite 200, Montebello NY 10901

## NOTICE TO EMPLOYEES, RESIDENTS AND RESIDENT REPRESENTATIVES

Date: **December 29, 2025**

Dear Employees and Residents of Clinton Healthcare Center:

This notice is to inform you that 9211 Stuart Lane LLC plans to become the owner of the land and building of this nursing home. Clinton Nursing and Rehab Center LLC plans to become the owner of the operations and beds rights of this nursing home. This change is scheduled to happen on **March 1, 2026**.

Clinton Nursing and Rehab Center LLC is honored to assume operations of this facility. We are committed to working hand-in-hand with the dedicated employees to uphold the highest standards of care, while fostering an environment that is welcoming and supportive for both residents and staff. Above all, we recognize the importance of ensuring continuity of care throughout this transition. We look forward to building upon the strong foundation already in place and are excited to meet each of you soon.

9211 Stuart Lane LLC and Clinton Nursing and Rehab Center LLC asked the Maryland Health Care Commission, <https://mhcc.maryland.gov/>, to approve this change of ownership.

You have the right to submit comments about this planned change to the Commission.

Your comments must be received by **January 30, 2026**

Send all comments to:  
Maryland Health Care Commission  
[mhcc.confilings@maryland.gov](mailto:mhcc.confilings@maryland.gov)  
4160 Patterson Ave  
Baltimore, MD 21215  
410-764-3460

New Ownership Contact Information:

Jack Shelby, Authorized Official  
Health Consulting Services, Admin Services  
Phone: 18555571427  
Email: [questions@healthcs.com](mailto:questions@healthcs.com)  
Address: 2850 Quarry Lake Drive Baltimore MD 21209

## **NOTICE TO EMPLOYEES, RESIDENTS AND RESIDENT REPRESENTATIVES**

Date: **December 29, 2025**

Dear Employees and Residents of Cumberland Healthcare Center:

This notice is to inform you that 512 Winifred Road LLC plans to become the owner of the land and building of this nursing home. Cumberland Nursing and Rehab Center LLC plans to become the owner of the operations and beds rights of this nursing home. This change is scheduled to happen on **March 1, 2026**.

Cumberland Nursing and Rehab Center LLC is honored to assume operations of this facility. We are committed to working hand-in-hand with the dedicated employees to uphold the highest standards of care, while fostering an environment that is welcoming and supportive for both residents and staff. Above all, we recognize the importance of ensuring continuity of care throughout this transition. We look forward to building upon the strong foundation already in place and are excited to meet each of you soon.

512 Winifred Road LLC plans, and Cumberland Nursing and Rehab Center LLC asked the Maryland Health Care Commission, <https://mhcc.maryland.gov/>, to approve this change of ownership.

You have the right to submit comments about this planned change to the Commission.

Your comments must be received by **January 30, 2026**

Send all comments to:  
Maryland Health Care Commission  
mhcc.confilings@maryland.gov  
4160 Patterson Ave  
Baltimore, MD 21215  
410-764-3460

New Ownership Contact Information:  
Jack Shelby, Authorized Official  
Health Consulting Services, Admin Services  
Phone: 18555571427  
Email: questions@healthcs.com  
Address: 2850 Quarry Lake Drive Baltimore MD 21209

## NOTICE TO EMPLOYEES, RESIDENTS AND RESIDENT REPRESENTATIVES

Date: **December 29, 2025**

Dear Employees and Residents of Ellicott City Healthcare Center:

This notice is to inform you that 3000 North Ridge Road LLC plans to become the owner of the land and building of this nursing home. Ellicott City Nursing and Rehab Center LLC plans to become the owner of the operations and beds rights of this nursing home. This change is scheduled to happen on **March 1, 2026**.

Ellicott City Nursing and Rehab Center LLC is honored to assume operations of this facility. We are committed to working hand-in-hand with the dedicated employees to uphold the highest standards of care, while fostering an environment that is welcoming and supportive for both residents and staff. Above all, we recognize the importance of ensuring continuity of care throughout this transition. We look forward to building upon the strong foundation already in place and are excited to meet each of you soon.

3000 North Ridge Road LLC and Ellicott City Nursing and Rehab Center LLC asked the Maryland Health Care Commission, <https://mhcc.maryland.gov/>, to approve this change of ownership.

You have the right to submit comments about this planned change to the Commission.

**Your comments must be received by January 30, 2026.**

Send all comments to:  
Maryland Health Care Commission  
[mhcc.confilings@maryland.gov](mailto:mhcc.confilings@maryland.gov)  
4160 Patterson Ave  
Baltimore, MD 21215  
410-764-3460

New Ownership Contact Information:

Jack Shelby, Authorized Official  
Hallmark Health Consulting Services, Admin Services  
Phone: (973) 944-0113  
Email: [questions@hallmarkhealthcs.com](mailto:questions@hallmarkhealthcs.com)  
Address: 400 Rella Blvd, Suite 200, Montebello NY 10901

## **NOTICE TO EMPLOYEES, RESIDENTS AND RESIDENT REPRESENTATIVES**

Date: **December 29, 2025**

Dear Employees and Residents of Fayette Health and Rehabilitation Center:

This notice is to inform you that 1217 West Fayette Street LLC plans to become the owner of the land and building of this nursing home. Fayette Nursing and Rehab Center LLC plans to become the owner of the operations and beds rights of this nursing home. This change is scheduled to happen on **March 1, 2026**.

Fayette Nursing and Rehab Center LLC is honored to assume operations of this facility. We are committed to working hand-in-hand with the dedicated employees to uphold the highest standards of care, while fostering an environment that is welcoming and supportive for both residents and staff. Above all, we recognize the importance of ensuring continuity of care throughout this transition. We look forward to building upon the strong foundation already in place and are excited to meet each of you soon.

1217 West Fayette Street LLC and Fayette Nursing and Rehab Center LLC asked the Maryland Health Care Commission, <https://mhcc.maryland.gov/>, to approve this change of ownership.

You have the right to submit comments about this planned change to the Commission.

**Your comments must be received by January 30, 2026.**

Send all comments to:  
Maryland Health Care Commission  
[mhcc.confilings@maryland.gov](mailto:mhcc.confilings@maryland.gov)  
4160 Patterson Ave  
Baltimore, MD 21215  
410-764-3460

New Ownership Contact Information:

Jack Shelby, Authorized Official  
Hallmark Health Consulting Services, Admin Services  
Phone: (973) 944-0113  
Email: [questions@hallmarkhealthcs.com](mailto:questions@hallmarkhealthcs.com)  
Address: 400 Rella Blvd, Suite 200, Montebello NY 10901

## NOTICE TO EMPLOYEES, RESIDENTS AND RESIDENT REPRESENTATIVES

Date: **December 29, 2025**

Dear Employees and Residents of Forestville Healthcare Center:

This notice is to inform you that 7420 Marlboro Pike LLC plans to become the owner of the land and building of this nursing home. Forestville Nursing and Rehab Center LLC plans to become the owner of the operations and beds rights of this nursing home. This change is scheduled to happen on **March 1, 2026**.

Forestville Nursing and Rehab Center LLC is honored to assume operations of this facility. We are committed to working hand-in-hand with the dedicated employees to uphold the highest standards of care, while fostering an environment that is welcoming and supportive for both residents and staff. Above all, we recognize the importance of ensuring continuity of care throughout this transition. We look forward to building upon the strong foundation already in place and are excited to meet each of you soon.

7420 Marlboro Pike LLC and Forestville Nursing and Rehab Center LLC asked the Maryland Health Care Commission, <https://mhcc.maryland.gov/>, to approve this change of ownership.

You have the right to submit comments about this planned change to the Commission.

Your comments must be received by **January 30, 2026**

Send all comments to:  
Maryland Health Care Commission  
[mhcc.confilings@maryland.gov](mailto:mhcc.confilings@maryland.gov)  
4160 Patterson Ave  
Baltimore, MD 21215  
410-764-3460

New Ownership Contact Information:

Jack Shelby, Authorized Official  
Health Consulting Services, Admin Services  
Phone: 18555571427  
Email: [questions@healthcs.com](mailto:questions@healthcs.com)  
Address: 2850 Quarry Lake Drive Baltimore MD 21209

# NOTICE TO EMPLOYEES, RESIDENTS AND RESIDENT REPRESENTATIVES

Date: **December 29, 2025**

Dear Employees and Residents of Fort Washington Health Center:

This notice is to inform you that 12021 Livingston Road LLC plans to become the owner of the land and building of this nursing home. Ft Washington Nursing and Rehab Center LLC plans to become the owner of the operations and beds rights of this nursing home. This change is scheduled to happen on **March 1, 2026**.

Ft Washington Nursing and Rehab Center LLC is honored to assume operations of this facility. We are committed to working hand-in-hand with the dedicated employees to uphold the highest standards of care, while fostering an environment that is welcoming and supportive for both residents and staff. Above all, we recognize the importance of ensuring continuity of care throughout this transition. We look forward to building upon the strong foundation already in place and are excited to meet each of you soon.

12021 Livingston Road LLC and Ft Washington Nursing and Rehab Center LLC asked the Maryland Health Care Commission, <https://mhcc.maryland.gov/>, to approve this change of ownership.

You have the right to submit comments about this planned change to the Commission.

**Your comments must be received by January 30, 2026**

Send all comments to:  
Maryland Health Care Commission  
[mhcc.confilings@maryland.gov](mailto:mhcc.confilings@maryland.gov)  
4160 Patterson Ave  
Baltimore, MD 21215  
410-764-3460

New Ownership Contact Information:

Jack Shelby, Authorized Official  
Health Consulting Services, Admin Services  
Phone: 18555571427  
Email: [questions@healthcs.com](mailto:questions@healthcs.com)  
Address: 2850 Quarry Lake Drive Baltimore MD 21209

## NOTICE TO EMPLOYEES, RESIDENTS AND RESIDENT REPRESENTATIVES

Date: **December 29, 2025**

Dear Employees and Residents of Hagerstown Healthcare Center:

This notice is to inform you that 750 Dual Highway LLC plans to become the owner of the land and building of this nursing home. Hagerstown Nursing and Rehab Center LLC plans to become the owner of the operations and beds rights of this nursing home. This change is scheduled to happen on **March 1, 2026**.

Hagerstown Nursing and Rehab Center LLC is honored to assume operations of this facility. We are committed to working hand-in-hand with the dedicated employees to uphold the highest standards of care, while fostering an environment that is welcoming and supportive for both residents and staff. Above all, we recognize the importance of ensuring continuity of care throughout this transition. We look forward to building upon the strong foundation already in place and are excited to meet each of you soon.

750 Dual Highway LLC and Hagerstown Nursing and Rehab Center LLC asked the Maryland Health Care Commission, <https://mhcc.maryland.gov/>, to approve this change of ownership.

You have the right to submit comments about this planned change to the Commission.

Your comments must be received by **January 30, 2026**

Send all comments to:  
Maryland Health Care Commission  
mhcc.confilings@maryland.gov  
4160 Patterson Ave  
Baltimore, MD 21215  
410-764-3460

New Ownership Contact Information:  
Jack Shelby, Authorized Official  
Health Consulting Services, Admin Services  
Phone: 18555571427  
Email: questions@healthcs.com  
Address: 2850 Quarry Lake Drive Baltimore MD 21209

## NOTICE TO EMPLOYEES, RESIDENTS AND RESIDENT REPRESENTATIVES

Date: **December 29, 2025**

Dear Employees and Residents of Holly Hill Healthcare Center:

This notice is to inform you that 531 Stevenson Lane LLC plans to become the owner of the land and building of this nursing home. Holly Hill Nursing and Rehab Center LLC plans to become the owner of the operations and beds rights of this nursing home. This change is scheduled to happen on **March 1, 2026**.

Holly Hill Nursing and Rehab Center LLC is honored to assume operations of this facility. We are committed to working hand-in-hand with the dedicated employees to uphold the highest standards of care, while fostering an environment that is welcoming and supportive for both residents and staff. Above all, we recognize the importance of ensuring continuity of care throughout this transition. We look forward to building upon the strong foundation already in place and are excited to meet each of you soon.

531 Stevenson Lane LLC and Holly Hill Nursing and Rehab Center LLC asked the Maryland Health Care Commission, <https://mhcc.maryland.gov/>, to approve this change of ownership.

You have the right to submit comments about this planned change to the Commission.

**Your comments must be received by January 30, 2026.**

Send all comments to:  
Maryland Health Care Commission  
[mhcc.confilings@maryland.gov](mailto:mhcc.confilings@maryland.gov)  
4160 Patterson Ave  
Baltimore, MD 21215  
410-764-3460

New Ownership Contact Information:

Jack Shelby, Authorized Official  
Hallmark Health Consulting Services, Admin Services  
Phone: (973) 944-0113  
Email: [questions@hallmarkhealthcs.com](mailto:questions@hallmarkhealthcs.com)  
Address: 400 Rella Blvd, Suite 200, Montebello NY 10901

## **NOTICE TO EMPLOYEES, RESIDENTS AND RESIDENT REPRESENTATIVES**

Date: **December 29, 2025**

Dear Employees and Residents of Kensington Healthcare Center:

This notice is to inform you that 3000 McComas Avenue LLC plans to become the owner of the land and building of this nursing home. Kensington Nursing and Rehab Center LLC plans to become the owner of the operations and beds rights of this nursing home. This change is scheduled to happen on **March 1, 2026**.

Kensington Nursing and Rehab Center LLC is honored to assume operations of this facility. We are committed to working hand-in-hand with the dedicated employees to uphold the highest standards of care, while fostering an environment that is welcoming and supportive for both residents and staff. Above all, we recognize the importance of ensuring continuity of care throughout this transition. We look forward to building upon the strong foundation already in place and are excited to meet each of you soon.

3000 McComas Avenue LLC and Kensington Nursing and Rehab Center LLC asked the Maryland Health Care Commission, <https://mhcc.maryland.gov/>, to approve this change of ownership.

You have the right to submit comments about this planned change to the Commission.

**Your comments must be received by January 30, 2026**

Send all comments to:  
Maryland Health Care Commission  
[mhcc.confilings@maryland.gov](mailto:mhcc.confilings@maryland.gov)  
4160 Patterson Ave  
Baltimore, MD 21215  
410-764-3460

New Ownership Contact Information:

Jack Shelby, Authorized Official  
Health Consulting Services, Admin Services  
Phone: 18555571427  
Email: [questions@healthcs.com](mailto:questions@healthcs.com)  
Address: 2850 Quarry Lake Drive Baltimore MD 21209

## **NOTICE TO EMPLOYEES, RESIDENTS AND RESIDENT REPRESENTATIVES**

Date: **December 29, 2025**

Dear Employees and Residents of Laurelwood Healthcare Center:

This notice is to inform you that 100 Laurel Drive LLC plans to become the owner of the land and building of this nursing home. Laurelwood Nursing and Rehab Center LLC plans to become the owner of the operations and beds rights of this nursing home. This change is scheduled to happen on **March 1, 2026**.

Laurelwood Nursing and Rehab Center LLC is honored to assume operations of this facility. We are committed to working hand-in-hand with the dedicated employees to uphold the highest standards of care, while fostering an environment that is welcoming and supportive for both residents and staff. Above all, we recognize the importance of ensuring continuity of care throughout this transition. We look forward to building upon the strong foundation already in place and are excited to meet each of you soon.

100 Laurel Drive LLC and Laurelwood Nursing and Rehab Center LLC asked the Maryland Health Care Commission, <https://mhcc.maryland.gov/>, to approve this change of ownership.

You have the right to submit comments about this planned change to the Commission.

**Your comments must be received by January 30, 2026.**

Send all comments to:  
Maryland Health Care Commission  
[mhcc.confilings@maryland.gov](mailto:mhcc.confilings@maryland.gov)  
4160 Patterson Ave  
Baltimore, MD 21215  
410-764-3460

New Ownership Contact Information:  
Jack Shelby, Authorized Official  
Hallmark Health Consulting Services, Admin Services  
Phone: (973) 944-0113  
Email: [questions@hallmarkhealthcs.com](mailto:questions@hallmarkhealthcs.com)  
Address: 400 Rella Blvd, Suite 200, Montebello NY 10901

## NOTICE TO EMPLOYEES, RESIDENTS AND RESIDENT REPRESENTATIVES

Date: **December 29, 2025**

Dear Employees and Residents of Marley Neck Health and Rehabilitation Center:

This notice is to inform you that 7575 East Howard Road LLC plans to become the owner of the land and building of this nursing home. Marley Neck Nursing and Rehab Center LLC plans to become the owner of the operations and beds rights of this nursing home. This change is scheduled to happen on **March 1, 2026**.

Marley Neck Nursing and Rehab Center LLC is honored to assume operations of this facility. We are committed to working hand-in-hand with the dedicated employees to uphold the highest standards of care, while fostering an environment that is welcoming and supportive for both residents and staff. Above all, we recognize the importance of ensuring continuity of care throughout this transition. We look forward to building upon the strong foundation already in place and are excited to meet each of you soon.

7575 East Howard Road LLC and Marley Neck Nursing and Rehab Center LLC asked the Maryland Health Care Commission, <https://mhcc.maryland.gov/>, to approve this change of ownership.

You have the right to submit comments about this planned change to the Commission.

Your comments must be received by **January 30, 2026**

Send all comments to:  
Maryland Health Care Commission  
[mhcc.confilings@maryland.gov](mailto:mhcc.confilings@maryland.gov)  
4160 Patterson Ave  
Baltimore, MD 21215  
410-764-3460

New Ownership Contact Information:

Jack Shelby, Authorized Official  
Health Consulting Services, Admin Services  
Phone: 18555571427  
Email: [questions@healthcs.com](mailto:questions@healthcs.com)  
Address: 2850 Quarry Lake Drive Baltimore MD 21209

## NOTICE TO EMPLOYEES, RESIDENTS AND RESIDENT REPRESENTATIVES

Date: **December 29, 2025**

Dear Employees and Residents of Northwest Healthcare Center:

This notice is to inform you that 4601 Pall Mall Road LLC plans to become the owner of the land and building of this nursing home. Northwest Nursing and Rehab Center LLC plans to become the owner of the operations and beds rights of this nursing home. This change is scheduled to happen on **March 1, 2026**.

Northwest Nursing and Rehab Center LLC is honored to assume operations of this facility. We are committed to working hand-in-hand with the dedicated employees to uphold the highest standards of care, while fostering an environment that is welcoming and supportive for both residents and staff. Above all, we recognize the importance of ensuring continuity of care throughout this transition. We look forward to building upon the strong foundation already in place and are excited to meet each of you soon.

4601 Pall Mall Road LLC and Northwest Nursing and Rehab Center LLC asked the Maryland Health Care Commission, <https://mhcc.maryland.gov/>, to approve this change of ownership.

You have the right to submit comments about this planned change to the Commission.

**Your comments must be received by January 30, 2026.**

Send all comments to:  
Maryland Health Care Commission  
[mhcc.confilings@maryland.gov](mailto:mhcc.confilings@maryland.gov)  
4160 Patterson Ave  
Baltimore, MD 21215  
410-764-3460

New Ownership Contact Information:

Jack Shelby, Authorized Official  
Hallmark Health Consulting Services, Admin Services  
Phone: (973) 944-0113  
Email: [questions@hallmarkhealthcs.com](mailto:questions@hallmarkhealthcs.com)  
Address: 400 Rella Blvd, Suite 200, Montebello NY 10901

## NOTICE TO EMPLOYEES, RESIDENTS AND RESIDENT REPRESENTATIVES

Date: **December 29, 2025**

Dear Employees and Residents of Pleasant View Healthcare Center:

This notice is to inform you that 4101 Baltimore Natl Pike LLC plans to become the owner of the land and building of this nursing home. Pleasant View Nursing and Rehab Center LLC plans to become the owner of the operations and beds rights of this nursing home. This change is scheduled to happen on **March 1, 2026**.

Pleasant View Nursing and Rehab Center LLC is honored to assume operations of this facility. We are committed to working hand-in-hand with the dedicated employees to uphold the highest standards of care, while fostering an environment that is welcoming and supportive for both residents and staff. Above all, we recognize the importance of ensuring continuity of care throughout this transition. We look forward to building upon the strong foundation already in place and are excited to meet each of you soon.

4101 Baltimore Natl Pike LLC and Pleasant View Nursing and Rehab Center LLC asked the Maryland Health Care Commission, <https://mhcc.maryland.gov/>, to approve this change of ownership.

You have the right to submit comments about this planned change to the Commission.

Your comments must be received by **January 30, 2026**

Send all comments to:  
Maryland Health Care Commission  
[mhcc.confilings@maryland.gov](mailto:mhcc.confilings@maryland.gov)  
4160 Patterson Ave  
Baltimore, MD 21215  
410-764-3460

New Ownership Contact Information:  
Jack Shelby, Authorized Official  
Health Consulting Services, Admin Services  
Phone: 18555571427  
Email: [questions@healthcs.com](mailto:questions@healthcs.com)  
Address: 2850 Quarry Lake Drive Baltimore MD 21209

## **NOTICE TO EMPLOYEES, RESIDENTS AND RESIDENT REPRESENTATIVES**

Date: **December 29, 2025**

Dear Employees and Residents of Silver Spring Healthcare Center:

This notice is to inform you that 13908 New Hampshire Ave LLC plans to become the owner of the land and building of this nursing home. Silver Spring Nursing and Rehab Center LLC plans to become the owner of the operations and beds rights of this nursing home. This change is scheduled to happen on **March 1, 2026**.

Silver Spring Nursing and Rehab Center LLC is honored to assume operations of this facility. We are committed to working hand-in-hand with the dedicated employees to uphold the highest standards of care, while fostering an environment that is welcoming and supportive for both residents and staff. Above all, we recognize the importance of ensuring continuity of care throughout this transition. We look forward to building upon the strong foundation already in place and are excited to meet each of you soon.

13908 New Hampshire Ave LLC and Silver Spring Nursing and Rehab Center LLC asked the Maryland Health Care Commission, <https://mhcc.maryland.gov/>, to approve this change of ownership.

You have the right to submit comments about this planned change to the Commission.

**Your comments must be received by January 30, 2026**

Send all comments to:  
Maryland Health Care Commission  
[mhcc.confilings@maryland.gov](mailto:mhcc.confilings@maryland.gov)  
4160 Patterson Ave  
Baltimore, MD 21215  
410-764-3460

New Ownership Contact Information:

Jack Shelby, Authorized Official  
Health Consulting Services, Admin Services  
Phone: 18555571427  
Email: [questions@healthcs.com](mailto:questions@healthcs.com)  
Address: 2850 Quarry Lake Drive Baltimore MD 21209

## **NOTICE TO EMPLOYEES, RESIDENTS AND RESIDENT REPRESENTATIVES**

Date: **December 29, 2025**

Dear Employees and Residents of South River Healthcare Center:

This notice is to inform you that 144 Washington Road LLC plans to become the owner of the land and building of this nursing home. South River Nursing and Rehab Center LLC plans to become the owner of the operations and beds rights of this nursing home. This change is scheduled to happen on **March 1, 2026**.

South River Nursing and Rehab Center LLC is honored to assume operations of this facility. We are committed to working hand-in-hand with the dedicated employees to uphold the highest standards of care, while fostering an environment that is welcoming and supportive for both residents and staff. Above all, we recognize the importance of ensuring continuity of care throughout this transition. We look forward to building upon the strong foundation already in place and are excited to meet each of you soon.

144 Washington Road LLC and South River Nursing and Rehab Center LLC asked the Maryland Health Care Commission, <https://mhcc.maryland.gov/>, to approve this change of ownership.

You have the right to submit comments about this planned change to the Commission.

**Your comments must be received by January 30, 2026**

Send all comments to:  
Maryland Health Care Commission  
[mhcc.confilings@maryland.gov](mailto:mhcc.confilings@maryland.gov)  
4160 Patterson Ave  
Baltimore, MD 21215  
410-764-3460

New Ownership Contact Information:

Jack Shelby, Authorized Official  
Health Consulting Services, Admin Services  
Phone: 1855571427  
Email: [questions@healthcs.com](mailto:questions@healthcs.com)  
Address: 2850 Quarry Lake Drive Baltimore MD 21209

# NOTICE TO EMPLOYEES, RESIDENTS AND RESIDENT REPRESENTATIVES

Date: **December 29, 2025**

Dear Employees and Residents of Westminster Healthcare Center:

This notice is to inform you that 1234 Washington Road LLC plans to become the owner of the land and building of this nursing home. Westminster Nursing and Rehab Center LLC plans to become the owner of the operations and beds rights of this nursing home. This change is scheduled to happen on **March 1, 2026**.

Westminster Nursing and Rehab Center LLC is honored to assume operations of this facility. We are committed to working hand-in-hand with the dedicated employees to uphold the highest standards of care, while fostering an environment that is welcoming and supportive for both residents and staff. Above all, we recognize the importance of ensuring continuity of care throughout this transition. We look forward to building upon the strong foundation already in place and are excited to meet each of you soon.

1234 Washington Road LLC and Westminster Nursing and Rehab Center LLC asked the Maryland Health Care Commission, <https://mhcc.maryland.gov/>, to approve this change of ownership.

You have the right to submit comments about this planned change to the Commission.

Your comments must be received by **January 30, 2026**

Send all comments to:  
Maryland Health Care Commission  
[mhcc.confilings@maryland.gov](mailto:mhcc.confilings@maryland.gov)  
4160 Patterson Ave  
Baltimore, MD 21215  
410-764-3460

New Ownership Contact Information:

Jack Shelby, Authorized Official  
Health Consulting Services, Admin Services  
Phone: 18555571427  
Email: [questions@healthcs.com](mailto:questions@healthcs.com)  
Address: 2850 Quarry Lake Drive Baltimore MD 21209

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## **Attachment M**

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**Vendor****Services**

[REDACTED]	Medical Supplies
[REDACTED]	Rehab Services
[REDACTED]	Pharmacy Services
[REDACTED]	Billing & Bookkeeping
[REDACTED]	Food Supplies
[REDACTED]	Benefits Management
[REDACTED]	Software
[REDACTED]	Food Supplies
[REDACTED]	Medical Supplies
[REDACTED]	Software
[REDACTED]	Accounting Services
[REDACTED]	Cleaning Supplies
[REDACTED]	Maintenance Supplies
[REDACTED]	Hiring/Job Listing
[REDACTED]	Enteral Supplies
[REDACTED]	Office Supplies
[REDACTED]	Office Supplies
[REDACTED]	Accounting Services

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## **Attachment N**

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# Attachment O

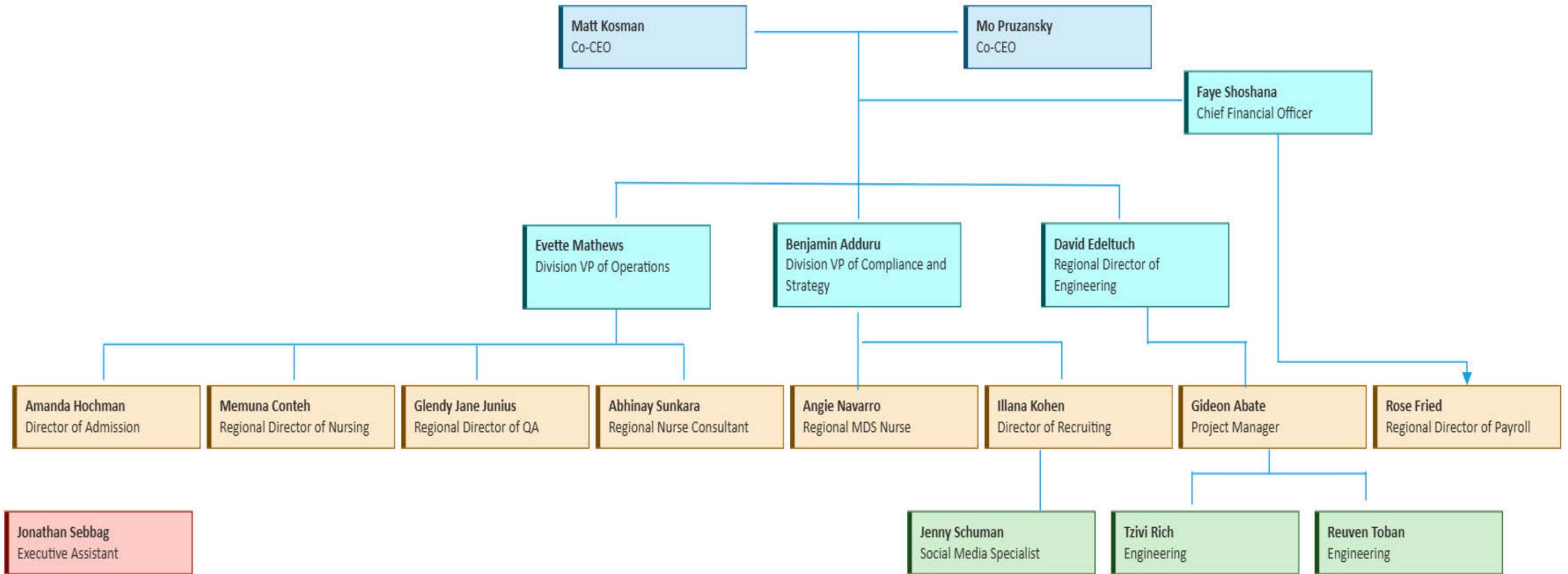
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# HALLMARK HEALTH CONSULTING SERVICES LLC - ORG CHART

POSITION	NAME	ROLE DESCRIPTION
CEO	Meir Silberberg	Provides overall leadership and strategic direction for the organization.
VP of Business Development	Megan Angle	Leads growth initiatives, partnerships, and market expansion strategies.
VP of Human Resources	Rodney Richards	Manages HR functions including recruitment, compliance, and employee engagement.
Regional Director of Operations	Michael Lavin	Oversees operational performance and efficiency across regions.
Regional Director of Clinical Operations	Tia Watson	Supervises clinical practices and ensures regulatory compliance.
Regional Director of Clinical Operations	Jean Watson	Shares responsibility for clinical oversight and quality assurance.

# Health Consulting Services Organizational Chart



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# Attachment P

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Source <https://data.cms.gov/provider-data/dataset/284v-j9fz>  
Nursing hours profile

2022 and 2024 total hour data are included in the FY26 SNF VBP.  
2021-2025 data are from CMS archived data snapshots. In the Nov or Dec snapshot of a year, the "provider info" csv

**Question 13: Staffing ratios for RNs, LPNs, and total nursing hours (including weekends) per patient day**

before and after the initiation of Jack Shelby's management or control over these facilities

Nov21 Nov23 VBP FY26 Nov25  
Provider Provider Performance Provider  
Info Baseline Info Period Info

Source:

Note	CCN	State	JACK SHELBY Facility Name	Adjusted Total Nursing Staff Hours per Resident per Day						Adjusted RN Staffing Hours per Resident per Day					
				2019	2021	2022	2023	2024	2025	2019	2021	2022	2023	2024	2025
c	455849	TX	ADVANCED REHABILITATION AND HEALTHCARE OF BOWIE	3.29	3.36	3.42	2.84	3.43	3.39	0.14	0.19	0.21	0.23	0.37	0.27
c	675038	TX	CLYDE NURSING CENTER	3.25	3.01	3.57	3.15	3.49	3.25	0.30	0.34	0.45	0.43	0.41	0.28
c	675013	TX	CROWELL NURSING CENTER	2.66	3.01	3.77	3.24	3.39	3.58	0.36	0.44	0.52	0.46	0.70	0.74
c	455961	TX	PALO PINTO NURSING CENTER	3.04	3.35	4.00	3.52	3.99	3.30	0.24	0.33	0.40	0.34	0.65	0.62
c	455606	TX	PARK VIEW CARE CENTER	3.20	2.88	3.57	3.69	4.75	4.16	0.16	0.23	0.23	0.36	0.59	0.67
c	675478	TX	PRAIRIE HOUSE LIVING CENTER	3.26	3.09	4.10	3.45	3.63	3.30	0.14	0.20	0.25	0.21	0.34	0.36
c	455957	TX	SANTA FE HEALTH & REHABILITATION CENTER	3.39	2.96	3.34	3.20	3.33	3.44	0.20	0.31	0.31	0.43	0.51	0.72
c	675042	TX	SEYMOUR REHABILITATION AND HEALTHCARE	3.39	3.35	3.53	3.47	3.07	3.50	0.60	0.24	0.23	0.32	0.64	0.50
c	675624	TX	WHITEHALL REHAB & NURSING	3.43	3.19	4.52	3.42	3.47	3.53	0.40	0.21	0.33	0.46	0.57	0.48
d	105140	FL	THE BRISTOL CARE CENTER	4.17	8.22	3.69	3.53	4.05	3.91	0.65	1.28	0.39	0.44	0.57	0.65
e	106095	FL	CLUB HEALTHCARE AND REHABILITATION CENTER AT THE V	3.83	3.51	3.39	3.88	3.52	3.71	0.56	0.27	0.42	0.40	0.50	0.49
e	106058	FL	WOODLAND GROVE HEALTHCARE & REHABILITATION CENTER	4.15	3.96	3.62	3.77	3.49	3.58	0.69	0.48	0.43	0.83	0.58	0.68
e	686123	FL	KENDALL LAKES HEALTHCARE AND REHAB CENTER	0.00	4.04	3.73	3.92	3.46	3.38	0.00	1.30	1.12	1.30	1.20	1.16
e	105761	FL	SUNSET LAKE HEALTHCARE AND REHABILITATION CENTER	4.26	4.20	3.58	3.64	3.25	3.39	0.94	0.73	0.45	0.75	0.41	0.55
e	105217	FL	NORTH BEACH HEALTHCARE AND REHABILITATION CENTER	4.23	4.03	3.77	3.79	3.42	3.42	1.05	1.18	1.01	0.93	0.74	0.79
e	105251	FL	ROCKLEDGE HEALTHCARE & REHABILITATION CENTER	4.38	3.38	3.98	4.09	3.65	3.46	0.85	0.70	0.46	0.82	0.48	0.51
e	105202	FL	APOLLO HEALTHCARE & REHABILITATION CENTER	3.72	4.01	3.43	3.73	3.75	3.73	0.60	0.51	0.31	0.54	0.46	0.63
e	106072	FL	VILLAGE PLACE HEALTHCARE AND REHABILITATION CENTER	4.40	4.43	3.79	N/A	3.78	3.64	0.70	0.74	0.58	N/A	0.74	0.59
e	105468	FL	PONCE THERAPY CARE CENTER AND REHAB, THE	2.69	3.54	3.13	3.61	3.42	3.29	0.41	0.87	0.65	0.84	0.57	0.51
e	105193	FL	PARK MEADOWS HEALTHCARE & REHABILITATION CENTER	4.41	4.40	4.62	4.69	3.80	3.99	0.53	0.24	0.27	0.37	0.33	0.47
e	105930	FL	VILLA HEALTHCARE & REHABILITATION CENTER	7.69	N/A	3.88	3.83	3.35	3.54	1.16	N/A	0.42	0.60	0.57	0.55
e	105822	FL	GARDENS HEALTHCARE & REHABILITATION CENTER	4.36	4.42	3.74	3.66	3.42	3.32	0.49	0.46	0.32	0.42	0.41	0.35
e	105159	FL	GREENBRIAR HEALTHCARE REHABILITATION AND NURSING C	3.98	4.13	3.76	4.04	3.78	3.83	0.63	0.69	0.65	0.52	0.61	0.54
e	105196	FL	THE LODGE HEALTHCARE AND REHABILITATION CENTER	4.47	3.47	3.53	3.57	3.32	3.59	0.91	0.50	0.42	0.38	0.28	0.45
e	105119	FL	WILTON MANORS HEALTHCARE & REHABILITATION CENTER	4.27	3.95	3.53	3.96	3.67	3.59	0.95	0.73	0.54	0.50	0.56	0.62
e	105072	FL	LEXINGTON HEALTHCARE AND REHABILITATION CENTER	4.26	4.07	3.43	3.92	3.49	3.49	0.70	0.58	0.45	0.43	0.42	0.39
e	105522	FL	LEHIGH ACRES HEALTHCARE & REHAB CENTER	4.14	3.89	3.86	4.19	3.57	3.52	0.70	0.53	0.85	1.02	0.56	0.69
e	106065	FL	ISLE HEALTHCARE & REHABILITATION CENTER	3.75	3.81	3.80	3.72	3.50	3.67	0.67	0.56	0.48	0.59	0.63	0.64
e	105580	FL	CARLTON SHORES HEALTHCARE AND REHABILITATION CENTE	4.48	4.52	3.61	4.13	4.84	3.78	0.80	0.40	0.39	0.44	1.23	0.45
e	105375	FL	SOUTH CAMPUS CARE CENTER AND REHAB	5.01	3.79	3.84	3.84	3.35	3.38	0.46	0.40	0.40	0.53	0.39	0.54
e	105640	FL	NORTH LAKE CARE CENTER AND REHAB	4.66	4.59	4.85	4.33	3.77	3.94	0.56	0.62	0.67	1.49	0.86	1.00
e	106046	FL	TERRACE HEALTHCARE & REHABILITATION CENTER	3.75	3.51	3.65	4.08	3.63	3.94	0.49	0.44	0.42	0.42	0.39	0.30
			<b>National Average</b>	<b>3.87</b>	<b>3.90</b>	<b>3.72</b>	<b>3.81</b>	<b>3.80</b>	<b>3.97</b>	<b>0.69</b>	<b>0.40</b>	<b>0.69</b>	<b>0.69</b>	<b>0.67</b>	<b>0.69</b>
			<b>Florida Average</b>	<b>4.33</b>	<b>4.31</b>	<b>4.05</b>	<b>3.99</b>	<b>3.88</b>	<b>4.04</b>	<b>0.75</b>	<b>0.84</b>	<b>0.76</b>	<b>0.76</b>	<b>0.74</b>	<b>0.77</b>
			<b>Texas Average</b>	<b>3.46</b>	<b>3.44</b>	<b>3.48</b>	<b>3.27</b>	<b>3.47</b>	<b>3.63</b>	<b>0.40</b>	<b>0.76</b>	<b>0.36</b>	<b>0.36</b>	<b>0.43</b>	<b>0.46</b>

Notes:

Gray shading indicates periods before or after Jack Shelby's ownership/management.

"N/A" means that facility does not have nursing hours reported to CMS for that year.

c Owned by Jack Shelby since July 1, 2021

d Owned by Jack Shelby 2021 through 12/17/2025

e Jack Shelby was Manager for the Holding Company Owner LL July 2022 through periods ending between November 2022 and January 2023.

Source <https://data.cms.gov/provider-data/dataset/284v-j9fz>

Nursing hours profile

has the statistics

**Question 13: Staffing ratios for RNs, LPNs, and total nursing ho**

before and after the initiation of Jack Shelby's management or control over these faciliti

Source: Nov21 Nov22 Nov23 Nov24 Nov25  
Provider Provider Provider Provider Provider  
Info Info Info Info Info Nov21 Nov22 Nov23 Nov24 Nov25  
Provider Provider Provider Provider Provider  
Info Info Info Info Info

Note	CCN	State	JACK SHELBY Facility Name	Adjusted LPN Staffing Hours per Resident per Day						Adjusted Nurse Aide Staffing Hours per Resident per Day					
				2019	2021	2022	2023	2024	2025	2019	2021	2022	2023	2024	2025
c	455849	TX	ADVANCED REHABILITATION AND HEALTHCARE OF BOWIE	1.17	1.25	1.16	1.14	1.22	1.15	1.98	1.92	2.04	1.44	1.66	1.96
c	675038	TX	CLYDE NURSING CENTER	0.84	0.73	0.71	0.69	0.97	1.07	2.11	1.94	2.23	2.03	2.12	1.90
c	675013	TX	CROWELL NURSING CENTER	0.63	0.84	0.72	0.65	0.85	0.75	1.67	1.71	2.16	2.14	1.91	2.09
c	455961	TX	PALO PINTO NURSING CENTER	1.14	0.93	0.99	0.99	1.19	1.01	1.64	2.09	2.45	2.18	2.07	1.67
c	455606	TX	PARK VIEW CARE CENTER	0.68	0.82	0.84	0.89	1.01	0.87	2.39	1.82	2.20	2.44	3.05	2.61
c	675478	TX	PRAIRIE HOUSE LIVING CENTER	1.07	0.97	1.13	1.16	1.06	1.11	2.05	1.92	2.20	2.05	2.11	1.83
c	455957	TX	SANTA FE HEALTH & REHABILITATION CENTER	0.95	0.83	0.98	0.84	1.02	0.67	2.24	1.81	1.73	1.93	1.55	2.06
c	675042	TX	SEYMOUR REHABILITATION AND HEALTHCARE	1.11	1.38	1.33	1.15	0.99	1.03	1.66	1.72	1.79	1.97	1.17	1.98
c	675624	TX	WHITEHALL REHAB & NURSING	0.71	0.94	1.12	0.85	0.90	0.95	2.34	2.04	2.49	2.09	1.69	2.10
d	105140	FL	THE BRISTOL CARE CENTER	1.01	2.03	1.08	0.79	0.99	0.93	2.53	4.94	2.31	2.30	2.34	2.33
e	106095	FL	CLUB HEALTHCARE AND REHABILITATION CENTER AT THE V	0.91	1.07	0.98	1.01	1.01	1.14	2.31	2.17	2.50	2.50	2.07	2.08
e	106058	FL	WOODLAND GROVE HEALTHCARE & REHABILITATION CENTER	0.92	1.07	1.02	0.79	0.81	0.65	2.57	2.42	2.16	2.20	2.23	2.25
e	686123	FL	KENDALL LAKES HEALTHCARE AND REHAB CENTER	0.00	0.45	0.42	0.21	0.18	0.16	0.00	2.36	2.38	2.39	2.11	2.05
e	105761	FL	SUNSET LAKE HEALTHCARE AND REHABILITATION CENTER	0.88	0.84	0.99	0.71	0.93	0.79	2.50	2.66	2.31	2.20	2.04	2.05
e	105217	FL	NORTH BEACH HEALTHCARE AND REHABILITATION CENTER	0.75	0.47	0.63	0.62	0.69	0.55	2.51	2.46	2.42	2.30	2.07	2.08
e	105251	FL	ROCKLEDGE HEALTHCARE & REHABILITATION CENTER	0.92	0.43	1.00	0.84	0.95	0.76	2.64	2.27	2.68	2.43	2.29	2.20
e	105202	FL	APOLLO HEALTHCARE & REHABILITATION CENTER	0.89	1.02	0.76	0.98	0.91	0.78	2.21	2.49	1.83	2.22	2.28	2.31
e	106072	FL	VILLAGE PLACE HEALTHCARE AND REHABILITATION CENTER	1.12	1.04	0.92	N/A	0.98	0.90	2.59	2.69	2.47	0	2.10	2.15
e	105468	FL	PONCE THERAPY CARE CENTER AND REHAB, THE	0.58	0.68	0.52	0.74	0.76	0.75	1.70	2.07	1.81	2.09	2.08	2.02
e	105193	FL	PARK MEADOWS HEALTHCARE & REHABILITATION CENTER	1.23	1.21	1.21	1.45	1.16	0.95	2.65	2.93	3.24	2.85	2.35	2.56
e	105930	FL	VILLA HEALTHCARE & REHABILITATION CENTER	2.09	N/A	1.01	1.00	0.75	0.80	4.53	0.00	2.25	2.26	2.03	2.18
e	105822	FL	GARDENS HEALTHCARE & REHABILITATION CENTER	1.12	1.25	1.11	1.01	0.96	0.92	2.74	2.72	2.21	2.22	2.06	2.05
e	105159	FL	GREENBRIAR HEALTHCARE REHABILITATION AND NURSING C	1.04	1.00	0.92	1.07	0.91	0.86	2.33	2.46	2.61	2.45	2.47	2.43
e	105196	FL	THE LODGE HEALTHCARE AND REHABILITATION CENTER	0.87	0.66	0.80	0.91	0.95	0.99	2.72	2.32	2.42	2.28	2.02	2.15
e	105119	FL	WILTON MANORS HEALTHCARE & REHABILITATION CENTER	0.90	0.86	0.88	1.03	0.90	0.87	2.45	2.39	2.19	2.43	1.99	2.10
e	105072	FL	LEXINGTON HEALTHCARE AND REHABILITATION CENTER	0.91	0.83	0.57	1.01	0.94	0.98	2.65	2.66	1.92	2.48	2.17	2.13
e	105522	FL	LEHIGH ACRES HEALTHCARE & REHAB CENTER	0.96	0.90	0.91	0.95	0.98	0.78	2.48	2.47	2.39	2.33	2.02	2.04
e	106065	FL	ISLE HEALTHCARE & REHABILITATION CENTER	0.71	0.85	0.96	0.90	0.75	0.75	2.38	2.42	2.25	2.24	2.08	2.28
e	105580	FL	CARLTON SHORES HEALTHCARE AND REHABILITATION CENTE	0.94	1.24	1.10	1.19	1.22	1.21	2.76	2.87	2.57	2.50	2.37	2.12
e	105375	FL	SOUTH CAMPUS CARE CENTER AND REHAB	1.94	1.01	0.95	0.75	0.69	0.63	2.62	2.38	2.43	2.56	2.37	2.21
e	105640	FL	NORTH LAKE CARE CENTER AND REHAB	1.14	1.00	1.18	0.55	0.59	0.52	2.97	2.99	2.66	2.50	2.31	2.41
e	106046	FL	TERRACE HEALTHCARE & REHABILITATION CENTER	0.92	0.72	1.10	1.12	1.15	1.27	2.34	2.36	2.67	2.54	2.25	2.37
			<b>National Average</b>	<b>0.87</b>	<b>1.04</b>	<b>0.88</b>	<b>0.89</b>	<b>0.88</b>	<b>0.88</b>	<b>2.31</b>	<b>1.99</b>	<b>2.22</b>	<b>2.26</b>	<b>2.34</b>	<b>2.40</b>
			<b>Florida Average</b>	<b>0.89</b>	<b>0.87</b>	<b>0.88</b>	<b>0.87</b>	<b>0.83</b>	<b>0.82</b>	<b>2.69</b>	<b>2.63</b>	<b>2.47</b>	<b>2.38</b>	<b>2.41</b>	<b>2.44</b>
			<b>Texas Average</b>	<b>1.04</b>	<b>0.91</b>	<b>0.99</b>	<b>0.96</b>	<b>1.05</b>	<b>1.03</b>	<b>2.03</b>	<b>2.26</b>	<b>1.99</b>	<b>1.95</b>	<b>2.06</b>	<b>2.15</b>

Notes:

Gray shading indicates periods before or after Jack Shelby's ownership/managemen

"N/A" means that facility does not have nursing hours reported to CMS for that year.

c Owned by Jack Shelby since July 1, 2021

d Owned by Jack Shelby 2021 through 12/17/2025

e Jack Shelby was Manager for the Holding Company Owner LL July 2022 through peri

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# Attachment Q

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**Question 14: CMS Admissions/readmissions data for FLand TX NH owned or previously owned by Jack Shelby for the past 5 years.**

Note	CCN	State	JACK SHELBY Facility Name	Notes: Measure Code S_004_01_PPR_PD_RSRR					Notes: Measure Code 521, Adjusted Score				
				a					b				
				Rate of potentially preventable hospital readmissions 30 days after discharge from a SNF					Percentage of short-stay residents who were rehospitalized after a nursing home admission				
				2021	2022	2023	2024	2025	2021	2022	2023	2024	2025
c	455849	TX	ADVANCED REHABILITATION AND HEALTHCARE OF BOWIE	7.38	7.63	8.83	9.17	10.96	25.0	23.4	26.3	17.7	26.5
c	675038	TX	CLYDE NURSING CENTER	7.34	N/A	11.35	11.24	10.33	0.0	37.2	15.7	0.0	27.3
c	675013	TX	CROWELL NURSING CENTER	8.28	N/A	10.97	11.27	9.89	0.0	0.0	0.0	0.0	0.0
c	455961	TX	PALO PINTO NURSING CENTER	7.15	7.78	10.2	10.37	9.95	12.1	22.4	17.1	22.4	17.3
c	455606	TX	PARK VIEW CARE CENTER	7.25	7.76	10.69	9.78	9.7	22.6	33.8	24.7	21.3	0.0
c	675478	TX	PRAIRIE HOUSE LIVING CENTER	7.64	7.8	10.13	9.71	9.83	29.6	28.8	28.3	0.0	24.0
c	455957	TX	SANTA FE HEALTH & REHABILITATION CENTER	7.16	7.61	9.36	9.74	10.29	17.9	21.7	16.6	33.1	23.1
c	675042	TX	SEYMOUR REHABILITATION AND HEALTHCARE	7.95	N/A	11.36	10.8	10.67	0.0	24.2	27.0	0.0	8.4
c	675624	TX	WHITEHALL REHAB & NURSING	7.39	N/A	10.27	11.07	10.37	0.0	0.0	15.0	33.2	39.3
d	105140	FL	THE BRISTOL CARE CENTER	7.61	7.7	9.15	10.3	10.73	16.1	25.0	31.6	22.6	35.8
e	106095	FL	CLUB HEALTHCARE AND REHABILITATION CENTER AT THE V	7.49	8.34	10.61	10.24	11.36	28.8	24.1	27.6	28.1	24.9
e	106058	FL	WOODLAND GROVE HEALTHCARE & REHABILITATION CENTER	8.39	7.69	10.46	10.55	10.39	25.4	20.0	23.8	11.1	23.8
e	686123	FL	KENDALL LAKES HEALTHCARE AND REHAB CENTER	7.85	8.07	9.77	10.6	10.41	20.6	24.4	25.2	27.0	26.2
e	105761	FL	SUNSET LAKE HEALTHCARE AND REHABILITATION CENTER	7.31	7.92	11.79	11.09	11.87	29.3	34.6	24.8	22.9	22.6
e	105217	FL	NORTH BEACH HEALTHCARE AND REHABILITATION CENTER	7.84	8.33	9.61	11.18	12.33	24.0	20.9	27.4	24.4	22.9
e	105251	FL	ROCKLEDGE HEALTHCARE & REHABILITATION CENTER	8.32	8.15	14.38	12.43	10.21	27.4	27.7	23.5	20.4	33.5
e	105202	FL	APOLLO HEALTHCARE & REHABILITATION CENTER	8.23	8.33	11.31	12.18	11.33	29.5	37.0	20.1	38.4	24.4
e	106072	FL	VILLAGE PLACE HEALTHCARE AND REHABILITATION CENTER	8.42	8.07	12.36	10.66	11.3	19.7	26.3	22.8	0.0	30.5
e	105468	FL	PONCE THERAPY CARE CENTER AND REHAB, THE	7.45	7.5	11.08	12.5	14.05	21.3	23.1	20.5	27.1	17.9
e	105193	FL	PARK MEADOWS HEALTHCARE & REHABILITATION CENTER	7.87	7.59	9.98	9.41	8.84	31.4	17.7	22.5	24.6	22.2
e	105930	FL	VILLA HEALTHCARE & REHABILITATION CENTER	8.15	7.68	11.31	9.96	11.34	30.9	26.8	20.1	12.9	22.6
e	105822	FL	GARDENS HEALTHCARE & REHABILITATION CENTER	9.27	8.33	9.45	10.96	11.42	18.3	20.1	20.8	24.0	22.2
e	105159	FL	GREENBRIAR HEALTHCARE REHABILITATION AND NURSING C	8.34	7.95	10.33	10.21	10.19	24.8	28.6	23.6	25.4	29.2
e	105196	FL	THE LODGE HEALTHCARE AND REHABILITATION CENTER	7.56	7.71	11.8	12.34	11.27	24.3	31.7	25.3	25.3	26.4
e	105119	FL	WILTON MANORS HEALTHCARE & REHABILITATION CENTER	8.1	7.83	13.1	11.3	9.26	35.9	20.4	26.7	25.1	32.2
e	105072	FL	LEXINGTON HEALTHCARE AND REHABILITATION CENTER	9.23	8.43	11.76	10.56	10.55	30.1	30.5	36.2	22.3	28.0
e	105522	FL	LEHIGH ACRES HEALTHCARE & REHAB CENTER	8.79	7.61	12.12	12.27	11.32	22.4	24.9	22.3	17.3	26.7
e	106065	FL	ISLE HEALTHCARE & REHABILITATION CENTER	8.71	9.34	12.54	11.37	12.42	21.9	22.9	22.0	18.5	24.0
e	105580	FL	CARLTON SHORES HEALTHCARE AND REHABILITATION CENTE	7.47	8.07	11.79	10.07	N/A	20.3	23.8	20.7	0.0	0.0
e	105375	FL	SOUTH CAMPUS CARE CENTER AND REHAB	7.88	7.96	10.06	10.76	10.55	23.1	26.6	17.6	22.9	27.7
e	105640	FL	NORTH LAKE CARE CENTER AND REHAB	N/A	N/A	N/A	11.32	11.47	0.0	24.3	19.5	27.4	26.0
e	106046	FL	TERRACE HEALTHCARE & REHABILITATION CENTER	7.93	9.12	9.9	11.89	11.73	25.6	25.6	25.3	27.1	23.1
			<b>National Average</b>	<b>7.67</b>	<b>7.82</b>	<b>10.48</b>	<b>10.51</b>	<b>10.72</b>	<b>22.8</b>	<b>22.1</b>	<b>22.8</b>	<b>23.1</b>	<b>23.7</b>
			<b>Florida Average</b>						<b>26.1</b>	<b>25.2</b>	<b>25.5</b>	<b>25.3</b>	<b>26.0</b>
			<b>Texas Average</b>						<b>25.0</b>	<b>23.9</b>	<b>24.6</b>	<b>24.5</b>	<b>25.6</b>

Source: <X:\Client Projects\Precision Healthcare\2025\3 CON Prod\2 CON DATA\Need Demand\References\MD Data\CMS NH Data Snapshots>  
<https://data.cms.gov/provider-data/archived-data/nursing-homes>

a Table: Skilled Nursing Facility Quality Reporting Program Provider Data

b Table: NH Quality/MSR Claims

National and State Averages from: NH\_StateUSAverages Table and Skilled Nursing Facility Quality Reporting Program National Data Table

c Owned by Jack Shelby since July 1, 2021

d Owned by Jack Shelby 2021 through 12/17/2025

e Jack Shelby was Manager for the Holding Company Owner LL July 2022 through periods ending between November 2022 and January 2023. Grey shading indicates no longer under Jack Shelby owner

Notes: Gray shading indicates periods before or after Jack Shelby's ownership/management.

Data snapshots from December of each year.

Data collection periods differ by facility; reported values are from CMS NH Dataset archives of December of each year.

No data means insufficient information to rate.

**National and State values are unadjusted**

**Question 14: CMS Admissions/readmissions data for FLar**

Note	CCN	State	JACK SHELBY Facility Name	Source: <i>Notes: Measure Code 522, Adjusted Score</i>					<i>Notes: Measure Code 551, Adjusted Score</i>				
				Percentage of short-stay residents who had an outpatient emergency department visit					Number of hospitalizations per 1000 long-stay resident days				
				2021	2022	2023	2024	2025	2021	2022	2023	2024	2025
c	455849	TX	ADVANCED REHABILITATION AND HEALTHCARE OF BOWIE	13.0	22.7	20.6	18.5	9.0	2.5	2.7	2.0	1.9	1.8
c	675038	TX	CLYDE NURSING CENTER	0.0	7.1	20.4	0.0	19.6	1.2	1.3	2.2	1.5	2.4
c	675013	TX	CROWELL NURSING CENTER	0.0	0.0	0.0	0.0	0.0	0.8	1.0	1.3	1.4	1.4
c	455961	TX	PALO PINTO NURSING CENTER	9.3	2.3	21.3	9.5	19.1	1.9	1.7	1.6	1.6	1.8
c	455606	TX	PARK VIEW CARE CENTER	7.0	12.1	4.8	15.8	0.0	2.0	1.4	2.5	1.7	1.3
c	675478	TX	PRAIRIE HOUSE LIVING CENTER	13.1	26.8	17.8	0.0	19.1	1.5	1.3	2.2	1.8	2.3
c	455957	TX	SANTA FE HEALTH & REHABILITATION CENTER	9.7	9.0	6.0	11.4	13.2	1.0	2.2	3.0	2.3	1.6
c	675042	TX	SEYMOUR REHABILITATION AND HEALTHCARE	0.0	7.0	18.1	0.0	20.2	1.4	2.5	3.2	1.2	2.1
c	675624	TX	WHITEHALL REHAB & NURSING	0.0	0.0	19.9	8.9	12.6	0.5	0.8	1.5	0.8	0.6
d	105140	FL	THE BRISTOL CARE CENTER	8.8	9.3	8.5	8.7	11.2	2.4	1.4	2.3	1.9	3.5
e	106095	FL	CLUB HEALTHCARE AND REHABILITATION CENTER AT THE V	11.3	7.7	13.7	13.5	20.4	0.0	0.0	0.0	0.0	0.0
e	106058	FL	WOODLAND GROVE HEALTHCARE & REHABILITATION CENTER	1.4	8.1	20.7	7.5	2.2	1.7	1.9	1.7	1.4	2.2
e	686123	FL	KENDALL LAKES HEALTHCARE AND REHAB CENTER	2.4	5.2	5.0	4.9	10.0	1.4	2.0	2.1	2.5	3.0
e	105761	FL	SUNSET LAKE HEALTHCARE AND REHABILITATION CENTER	12.5	13.6	15.9	6.1	13.8	1.3	0.6	1.3	1.5	2.1
e	105217	FL	NORTH BEACH HEALTHCARE AND REHABILITATION CENTER	13.0	2.4	3.3	6.0	4.6	1.2	2.7	4.0	2.6	1.5
e	105251	FL	ROCKLEDGE HEALTHCARE & REHABILITATION CENTER	7.1	13.6	8.2	10.6	19.1	2.1	2.0	1.3	2.2	1.7
e	105202	FL	APOLLO HEALTHCARE & REHABILITATION CENTER	8.3	10.2	12.4	7.7	14.1	2.8	1.6	2.6	0.0	3.4
e	106072	FL	VILLAGE PLACE HEALTHCARE AND REHABILITATION CENTER	14.5	5.0	22.7	0.0	9.3	1.6	1.8	0.9	0.0	1.2
e	105468	FL	PONCE THERAPY CARE CENTER AND REHAB, THE	7.2	13.6	9.4	10.4	15.5	1.7	2.3	1.7	1.9	1.9
e	105193	FL	PARK MEADOWS HEALTHCARE & REHABILITATION CENTER	7.5	14.5	8.3	7.3	4.5	2.6	1.6	1.7	1.9	1.6
e	105930	FL	VILLA HEALTHCARE & REHABILITATION CENTER	5.4	11.4	6.1	6.6	6.4	2.1	0.8	1.6	1.0	1.5
e	105822	FL	GARDENS HEALTHCARE & REHABILITATION CENTER	6.3	10.0	6.5	7.7	7.9	1.1	1.3	1.7	2.7	1.4
e	105159	FL	GREENBRIAR HEALTHCARE REHABILITATION AND NURSING C	4.5	12.1	13.1	2.4	15.6	2.4	1.4	2.2	1.6	2.5
e	105196	FL	THE LODGE HEALTHCARE AND REHABILITATION CENTER	9.0	12.9	7.9	1.1	4.0	1.5	1.6	1.5	2.5	1.8
e	105119	FL	WILTON MANORS HEALTHCARE & REHABILITATION CENTER	10.4	12.1	9.0	13.0	7.8	1.9	1.0	2.1	1.8	1.5
e	105072	FL	LEXINGTON HEALTHCARE AND REHABILITATION CENTER	10.3	10.8	12.0	4.8	7.1	0.9	2.0	2.5	3.5	3.2
e	105522	FL	LEHIGH ACRES HEALTHCARE & REHAB CENTER	11.8	6.3	4.8	8.9	8.7	1.4	2.1	1.7	1.0	2.2
e	106065	FL	ISLE HEALTHCARE & REHABILITATION CENTER	10.1	14.9	12.0	10.9	3.7	1.8	2.0	1.4	2.1	1.8
e	105580	FL	CARLTON SHORES HEALTHCARE AND REHABILITATION CENTE	16.0	15.9	16.0	0.0	0.0	1.6	1.8	0.5	1.6	2.3
e	105375	FL	SOUTH CAMPUS CARE CENTER AND REHAB	10.3	8.0	11.1	10.4	10.8	2.2	1.9	2.2	2.5	2.1
e	105640	FL	NORTH LAKE CARE CENTER AND REHAB	0.0	3.6	14.2	3.4	11.4	2.5	2.9	3.5	1.1	2.2
e	106046	FL	TERRACE HEALTHCARE & REHABILITATION CENTER	4.8	5.8	8.8	9.4	4.4	1.9	3.1	2.4	2.0	2.3
			<b>National Average</b>	<b>9.7</b>	<b>11.4</b>	<b>12.5</b>	<b>12.2</b>	<b>12.0</b>	<b>1.5</b>	<b>1.5</b>	<b>1.8</b>	<b>1.7</b>	<b>1.9</b>
			<b>Florida Average</b>	<b>8.0</b>	<b>9.4</b>	<b>10.2</b>	<b>9.6</b>	<b>9.4</b>	<b>1.9</b>	<b>1.8</b>	<b>2.2</b>	<b>2.0</b>	<b>2.1</b>
			<b>Texas Average</b>	<b>10.4</b>	<b>11.8</b>	<b>12.7</b>	<b>12.2</b>	<b>12.0</b>	<b>1.8</b>	<b>1.7</b>	<b>2.1</b>	<b>1.9</b>	<b>2.1</b>

Source: [X:\Client Projects\Precision Healthcare\2025\3 CON Prod\2 CON DATA\Need I https://data.cms.gov/provider-data/archived-data/nursing-homes](https://data.cms.gov/provider-data/archived-data/nursing-homes)

a Table: Skilled Nursing Facility Quality Reporting Program Provider Data

b Table: NH Quality/MSR Claims

National and State Averages from: NH\_StateUSAverages Table and Skilled Nurs

c Owned by Jack Shelby since July 1, 2021

d Owned by Jack Shelby 2021 through 12/17/2025

e Jack Shelby was Manager for the Holding Company Owner LL July 2022 through ship or managership.

Notes: Gray shading indicates periods before or after Jack Shelby's ownership/manage

Data snapshots from December of each year.

Data collection periods differ by facility; reported values are from CMS NH Data

No data means insufficient information to rate.

**National and State values are unadjusted**

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## **Attachment R**

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**Question 16: CMS Quarterly Quality Scores for Florida SNF Facilities Associated with Jack Shelby September 2024 through September 2025**

Note: The only scores that apply to a period of Jack Shelby control are those associated with The Bristol Care Center

notes	CCN	State	Facility Name	a. Each facility's overall rating based on the most recent CMS 5-star quality rating system*						b. Has the facility maintained quarterly QA? Provide the quarterly QA meeting schedule
				Q1 Sept. 2024	Q2 Nov. 2024	Q3 Mar. 2025	Q4 June 2025	Q5 Sept. 2025	5 Quart. Avg.	
a	105140	FL	THE BRISTOL CARE CENTER	1	1	N/A	N/A	N/A	1	Yes, Last week of every month
b	106095	FL	CLUB HEALTHCARE AND REHABILITATION CENTER AT THE V	2	2	2	2	1	1.8	Yes, 3rd Thursday of every month
b	106058	FL	WOODLAND GROVE HEALTHCARE & REHABILITATION CENTER	5	5	5	5	5	5	Yes, 4th Friday of every month
b	686123	FL	KENDALL LAKES HEALTHCARE AND REHAB CENTER	5	4	5	5	5	4.8	Yes, Quarterly: 01/20/2026, 04/21/2026, 07/21/2026, 10/20/2026
b	105761	FL	SUNSET LAKE HEALTHCARE AND REHABILITATION CENTER	3	2	1	1	1	1.6	Yes, 3rd Wednesday of every month
b	105217	FL	NORTH BEACH HEALTHCARE AND REHABILITATION CENTER	1	1	1	1	1	1	Yes, 3rd Tuesday of every month
b	105251	FL	ROCKLEDGE HEALTHCARE & REHABILITATION CENTER	2	2	2	2	2	2	Yes, 3rd Tuesday of every month
b	105202	FL	APOLLO HEALTHCARE & REHABILITATION CENTER	2	2	2	2	2	2	Yes, 2nd Thursday of every month
b	106072	FL	VILLAGE PLACE HEALTHCARE AND REHABILITATION CENTER	3	3	3	3	3	3	Yes, Quarterly: 3/27/2026, 6/26/2026, 9/25/2026, 12/18/2026
b	105468	FL	PONCE THERAPY CARE CENTER AND REHAB, THE	4	5	5	4	4	4.4	Yes, 3rd Wednesday of every month
b	105193	FL	PARK MEADOWS HEALTHCARE & REHABILITATION CENTER	2	2	1	1	1	1.4	Yes, Last Wednesday of every month
b	105930	FL	VILLA HEALTHCARE & REHABILITATION CENTER	4	4	5	5	4	4.4	Yes, 3rd Wednesday of every month
b	105822	FL	GARDENS HEALTHCARE & REHABILITATION CENTER	5	5	3	4	2	3.8	Yes, 3rd Thursday of every month
b	105159	FL	GREENBRIAR HEALTHCARE REHABILITATION AND NURSING C	3	2	2	3	2	2.4	Yes, 2nd Tuesday of every month
b	105196	FL	THE LODGE HEALTHCARE AND REHABILITATION CENTER	4	4	4	3	3	3.6	Yes, 3rd Thursday of every month
b	105119	FL	WILTON MANORS HEALTHCARE & REHABILITATION CENTER	4	3	3	3	3	3.2	Yes, 2nd to last Friday of every month
b	105072	FL	LEXINGTON HEALTHCARE AND REHABILITATION CENTER	3	3	3	3	2	2.8	Yes, 3rd Wednesday of every month
b	105522	FL	LEHIGH ACRES HEALTHCARE & REHAB CENTER	3	2	2	2	2	2.2	Yes, 2nd Tuesday of every month
b	106065	FL	ISLE HEALTHCARE & REHABILITATION CENTER	5	5	5	5	3	4.6	Yes, 3rd Wednesday of every month
b	105580	FL	CARLTON SHORES HEALTHCARE AND REHABILITATION CENTE	5	4	5	5	5	4.8	Yes, Last Friday of every month
b	105375	FL	SOUTH CAMPUS CARE CENTER AND REHAB	4	3	2	2	3	2.8	Yes, Last Wednesday of every month
b	105640	FL	NORTH LAKE CARE CENTER AND REHAB	3	3	3	3	3	3	Yes, 3rd Thursday of every month
b	106046	FL	TERRACE HEALTHCARE & REHABILITATION CENTER	2	2	1	4	5	2.8	Yes, 3rd Wednesday of every month

Notes

- a. Owned by Jack Shelby 2021 through 12/17/2025
- b. Jack Shelby was Manager for the Holding Company Owner LL July 2022 through periods ending between November 2022 and January 2023

Source:

- a. CMS NH Quality Compare, Sept. 2024 - Sept. 2025
- b. Trustee Internal Data
- c. CMS Provider Data Files

Note(s):

- \* Quarterly data is from the CMS NH Quality Compare Snapshot data closest to the end of the quarter
- \*\* Please note that Resident Vaccination Rates were most recently collected by CMS 12/8/2024

**Question 16: CMS Quarterly Quality Scores for Florida SNF Facilities A**

Note: The only scores that apply to a period of Jack Shelby control are those associated with The Bri:

notes	CCN	State	Facility Name	c. % of residents and staff receiving Flu, COVID and Pneumonia vaccines					
				Flu		COVID-19**		Pneumonia	
				Residents	Staff	Residents	Staff	Residents	Staff
a	105140	FL	THE BRISTOL CARE CENTER	100.0%	7.5%	8.6%	0.8%	94.0%	N/A
b	106095	FL	CLUB HEALTHCARE AND REHABILITATION CENTER AT THE V	0.0%	8.2%	0.0%	0.0%	100.0%	N/A
b	106058	FL	WOODLAND GROVE HEALTHCARE & REHABILITATION CENTER	100.0%	36.3%	34.9%	1.2%	99.4%	N/A
b	686123	FL	KENDALL LAKES HEALTHCARE AND REHAB CENTER	100.0%	20.9%	29.5%	0.0%	100.0%	N/A
b	105761	FL	SUNSET LAKE HEALTHCARE AND REHABILITATION CENTER	100.0%	41.4%	10.2%	76.8%	100.0%	N/A
b	105217	FL	NORTH BEACH HEALTHCARE AND REHABILITATION CENTER	100.0%	25.5%	0.0%	0.0%	99.7%	N/A
b	105251	FL	ROCKLEDGE HEALTHCARE & REHABILITATION CENTER	100.0%	20.0%	0.0%	0.0%	98.7%	N/A
b	105202	FL	APOLLO HEALTHCARE & REHABILITATION CENTER	100.0%	5.7%	0.0%	0.6%	100.0%	N/A
b	106072	FL	VILLAGE PLACE HEALTHCARE AND REHABILITATION CENTER	N/A	20.0%	0.0%	0.0%	100.0%	N/A
b	105468	FL	PONCE THERAPY CARE CENTER AND REHAB, THE	100.0%	1.7%	0.0%	0.0%	97.6%	N/A
b	105193	FL	PARK MEADOWS HEALTHCARE & REHABILITATION CENTER	100.0%	23.0%	0.0%	0.0%	99.6%	N/A
b	105930	FL	VILLA HEALTHCARE & REHABILITATION CENTER	100.0%	26.4%	11.1%	1.7%	100.0%	N/A
b	105822	FL	GARDENS HEALTHCARE & REHABILITATION CENTER	100.0%	34.8%	1.9%	0.0%	100.0%	N/A
b	105159	FL	GREENBRIAR HEALTHCARE REHABILITATION AND NURSING C	100.0%	4.8%	28.9%	0.0%	100.0%	N/A
b	105196	FL	THE LODGE HEALTHCARE AND REHABILITATION CENTER	100.0%	45.2%	9.6%	1.3%	100.0%	N/A
b	105119	FL	WILTON MANORS HEALTHCARE & REHABILITATION CENTER	100.0%	27.8%	7.3%	10.8%	99.0%	N/A
b	105072	FL	LEXINGTON HEALTHCARE AND REHABILITATION CENTER	100.0%	21.8%	34.0%	0.0%	79.5%	N/A
b	105522	FL	LEHIGH ACRES HEALTHCARE & REHAB CENTER	100.0%	18.2%	18.6%	10.0%	100.0%	N/A
b	106065	FL	ISLE HEALTHCARE & REHABILITATION CENTER	100.0%	23.3%	46.7%	0.6%	100.0%	N/A
b	105580	FL	CARLTON SHORES HEALTHCARE AND REHABILITATION CENTE	100.0%	18.5%	30.8%	0.0%	100.0%	N/A
b	105375	FL	SOUTH CAMPUS CARE CENTER AND REHAB	100.0%	10.0%	5.7%	0.6%	96.0%	N/A
b	105640	FL	NORTH LAKE CARE CENTER AND REHAB	100.0%	8.3%	58.1%	0.0%	100.0%	N/A
b	106046	FL	TERRACE HEALTHCARE & REHABILITATION CENTER	100.0%	13.7%	23.3%	14.8%	97.5%	N/A

Notes

- a. Owned by Jack Shelby 2021 through 12/17/2025
- b. Jack Shelby was Managerfor the Holding Company Owner LL July 2022 through periods endin;

Source:

- a. CMS NH Quality Compare, Sept. 2024 - Sept. 2025
- b. Trustee Internal Data
- c. CMS Provider Data Files

Note(s):

- \* Quarterly data is from the CMS NH Quality Compare Snapshot data closest to the end of the
- \*\* Please note that Resident Vaccination Rates were most recently collected by CMS 12/8/202

**Ques 16 Supplement: CMS Quarterly Quality Scores for Florida SNF Facilities Associated with Jack Shelby July 2022 through November 2022**

notes	CCN	State	Facility Name	a. Each facility's overall rating based on the CMS 5-star quality rating system*		
				Q1 Sept. 2022	Q2 Nov. 2022	2 Quart. Avg.
a	105140	FL	THE BRISTOL CARE CENTER	2	2	2
b	106095	FL	CLUB HEALTHCARE AND REHABILITATION CENTER AT THE V	2	2	2
b	106058	FL	WOODLAND GROVE HEALTHCARE & REHABILITATION CENTER	5	5	5
b	686123	FL	KENDALL LAKES HEALTHCARE AND REHAB CENTER	5	5	5
b	105761	FL	SUNSET LAKE HEALTHCARE AND REHABILITATION CENTER	2	2	2
b	105217	FL	NORTH BEACH HEALTHCARE AND REHABILITATION CENTER	2	1	1.5
b	105251	FL	ROCKLEDGE HEALTHCARE & REHABILITATION CENTER	1	1	1
b	105202	FL	APOLLO HEALTHCARE & REHABILITATION CENTER	1	1	1
b	106072	FL	VILLAGE PLACE HEALTHCARE AND REHABILITATION CENTER	3	3	3
b	105468	FL	PONCE THERAPY CARE CENTER AND REHAB, THE	3	3	3
b	105193	FL	PARK MEADOWS HEALTHCARE & REHABILITATION CENTER	1	2	1.5
b	105930	FL	VILLA HEALTHCARE & REHABILITATION CENTER	4	4	4
b	105822	FL	GARDENS HEALTHCARE & REHABILITATION CENTER	5	5	5
b	105159	FL	GREENBRIAR HEALTHCARE REHABILITATION AND NURSING C	2	2	2
b	105196	FL	THE LODGE HEALTHCARE AND REHABILITATION CENTER	3	2	2.5
b	105119	FL	WILTON MANORS HEALTHCARE & REHABILITATION CENTER	3	3	3
b	105072	FL	LEXINGTON HEALTHCARE AND REHABILITATION CENTER	2	2	2
b	105522	FL	LEHIGH ACRES HEALTHCARE & REHAB CENTER	3	3	3
b	106065	FL	ISLE HEALTHCARE & REHABILITATION CENTER	5	5	5
b	105580	FL	CARLTON SHORES HEALTHCARE AND REHABILITATION CENTE	3	3	3
b	105375	FL	SOUTH CAMPUS CARE CENTER AND REHAB	2	2	2
b	105640	FL	NORTH LAKE CARE CENTER AND REHAB	4	4	4
b	106046	FL	TERRACE HEALTHCARE & REHABILITATION CENTER	2	2	2
Total				22	22	22
Above 3:				12	11	11

Notes

- a. Owned by Jack Shelby 2021 through 12/17/2025
- b. Jack Shelby was Managerfor the Holding Company Owner LL July 2022 through periods ending between November 2022 and January 2023

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# Attachment S

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## QUALITY IMPROVEMENT INITIATIVES

### WHITEHALL REHAB AND NURSING

#### STAFFING

Staffing rating has increased from a one star to a 3 star over the past three years since my start of employment at Whitehall. Several factors have contributed to this improvement and growth.

- RN staffing levels were improved by utilizing directed hiring practices to fill positions with RN's. We actively recruit RN staff and pay close attention to any applicants and / or inquiries about open or potential positions. We now have 7 RN staff members which is up from 2 in 2022. We are very strict about managing when the RN's work to ensure weekend and night coverage balancing the staffing and improving patient care. We have implemented a strong employee training and retention program to encourage longevity and attract new employees.

#### STATE SURVEY / HEALTH INSPECTIONS

This rating has fluctuated and is currently a 3 star. The lower star ratings were the result of IJ received for an elopement, for an abuse allegation and for a Van accident. In 2021, during COVID, there was a fine for infection control. Since that time, we have initiated multiple improvement programs.

- Regarding elopement, we are proactive with new admissions ensuring that we can meet the needs of the prospective resident and carefully review anyone that is an elopement risk. Once admitted, we have protocols in place for monitoring if they are wearing a code alert bracelet and at what point it becomes time for an at-risk resident to relocate to a secure unit. We also have systems in place for monitoring the alarms, checking and doing routine elopement assessments on our residents and educating visitors regarding entering and exiting the facility safely. We monitor change in condition on residents and ensure that we react quickly to a resident that may become an elopement / safety risk.
- Infection Control is a constant improvement area and opportunity for training. Much has evolved in this area over the past few years. We have training for new hires, annually, and as needed as areas of concern arise. We monitor our employees through rounds, skill validations on hire and annually, in-service training monthly and ongoing. Currently the DON, Administrator and one of our staff RN's

are certified as Infection Preventionist. Infection control tracking and trending is done to ensure following proper protocols and doing strong preventive measures.

- Some of the PIP’s that have been done since 2021 include:
  - Mobility
  - UTI
  - Weight / Loss
  - Accident / Safety

All have warranted improvement in each area. Mobility PIP focused on charting and ensuring that charting accurately reflects the resident. We do training upon hire, annually, and as needed in this area. Weight loss was a concern due to inconsistent staff that were doing the weights. We have stabilized this area, increased training ultimately improving the accuracy of resident weights. DON is responsible for monitoring residents with weight loss and ensuring proper interventions are in place. Dietary has initiated a menu committee and routinely interviews residents about likes and dislikes to maximize resident intake. Snacks and supplements are offered when residents do not eat the substantial part of their meal. At risk residents receive supplements on a med pass schedule and are encouraged to dine in the main dining room for closer monitoring.

We continue to identify areas which need improvement. We have a weekly Skin, Weight, Fall Prevention and Clinical Meeting. We also meet daily and discuss any and all clinical issues. Monthly we have a QAPI meeting and identify and discuss data from the prior month to set goals and identify any areas / systems that need improvement.

## CMS Nursing Home Compare – Quality Improvement Initiatives and Turnaround Actions

### Executive Summary Table

Facility	CMS Star Domain(s) Addressed	Primary Issue(s)	Key QAPI / PIP Actions	Monitoring & Outcomes
<b>Advanced Rehab</b>	Quality Measures	Antipsychotic use; Locomotion	Antipsychotic audits, GDR reviews, CNA education, therapy	Reduction in antipsychotic use; improved monitoring

Facility	CMS Star Domain(s) Addressed	Primary Issue(s)	Key QAPI / PIP Actions	Monitoring & Outcomes
<b>ilitation &amp; Health care of Bowie Clyde Nursing Center</b>	Quality Measures; Staffing	decline; Pressure ulcers	coordination, wound prevention in-services	of mobility; no additional in-house pressure ulcers
<b>Crowell Nursing Center</b>	Quality Measures; Staffing	Pressure ulcers; UTIs; Nurse recruitment/retention; Falls	Turning & positioning education, hydration protocols, dietary interventions, recruitment initiatives, fall prevention education	Improved wound oversight; infection monitoring; staffing stabilization efforts ongoing
<b>Palo Pinto Nursing Center</b>	Quality Measures; Staffing	Mobility decline; ADL assistance; Falls; Staffing shortages	CNA documentation training, therapy screenings, fall risk interventions, recruitment incentives	Performance maintained below national benchmarks with continued monitoring
<b>Prairie House Living Center</b>	Quality Measures; Staffing	Mobility decline; Antipsychotic use; Falls; Staffing turnover	Restorative care education, medication audits, fall prevention strategies, recruitment and retention PIPs	Reduced antipsychotic usage; falls trending toward benchmarks; staffing oversight ongoing
<b>Santa Fe Health &amp; Rehabilitation Center</b>	Staffing; Quality Measures	High staff turnover; Antipsychotic use; Falls; Weight loss	Wage adjustments, retention incentives, GDR meetings, dietitian oversight, fall reduction plans	Turnover reduced below 4%; sustained medication and weight monitoring
<b>Seymour Rehabilitation &amp; Health care</b>	Quality Measures; Staffing; Health Inspections	Pressure ulcers; Weight loss; Medication use; Staffing shortages	Skin and weight monitoring, dietitian reviews, medication audits, recruitment initiatives	Quality measures trending below national averages; continued QAPI oversight
<b>Seymour Rehabilitation &amp; Health care</b>	Quality Measures; Health Inspections	Antipsychotic use; Falls; Infection control; Documentation	Monthly medication audits, fall prevention education, infection control retraining, documentation audits	Compliance goals met; PIPs adopted into ongoing QAPI

## Advanced Rehabilitation and Healthcare of Bowie (Bowie, TX)

### Quality Measure – Antipsychotic Medication Use

**PIP Dates:** 6/17/2021 – Ongoing

**Issue Identified:** Antipsychotic usage rate of 19.54%, exceeding the national benchmark of 14.24%.

**Root Cause Analysis:** Lack of admission audits, inconsistent follow-up on gradual dose reduction (GDR) recommendations, resident/family resistance to dose reductions, and infrequent nursing audits.

**Interventions Implemented:** - Routine audits of antipsychotic use - Mandatory pharmacist review of GDR recommendations - Admission medication reviews with pharmacist follow-up - Nursing education on psychotropic monitoring

**Monitoring & Outcomes:** Usage decreased from 19.54% to 18.45% by August 2021 with continued monitoring through QAPI.

### Quality Measure – Worsening of Independent Locomotion

**PIP Dates:** 7/14/2021 – ongoing

**Issue Identified:** Decline in independent locomotion despite performance above national average.

**Root Cause Analysis:** Improper CNA documentation, over-assistance by staff, resident resistance, communication gaps between therapy and nursing, and insurance denials affecting therapy duration.

**Interventions Implemented:** - CNA education on documentation and restorative care - Inclusion of CNAs in daily interdisciplinary stand-up meetings - Enhanced therapy and nursing communication

**Monitoring:** CASPER reports and LTCMI data reviewed monthly by QAPI.

### Quality Measure – Pressure Ulcers

**PIP Start Date:** 8/12/2021- ongoing

**Issue Identified:** Pressure ulcer rate of 7.69%, slightly above national average.

**Root Cause Analysis:** Resident non-compliance related to comorbidities and refusal of care; inconsistent adherence to skin protocols by staff.

**Interventions Implemented:** - Staff in-services on skin care and prevention - Daily wound monitoring and reporting - Resident education by wound care nurse

**Outcome:** No additional in-house pressure ulcers reported following intervention.

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## Clyde Nursing Center (Clyde, TX)

### Quality Measure – Pressure Ulcers

**PIP Dates:** 5/26/2021 – 10/31/2021

**Issue Identified:** Increase in pressure ulcers, including in-house acquired wounds.

**Root Cause Analysis:** Poor hydration and nutrition, CNA non-compliance with turning schedules, lack of department head oversight, and insufficient dietary assessments.

**Interventions Implemented:** - Staff education on positioning and turning - Enhanced monitoring by department heads - Dietitian assessments for high-risk residents - Contracted wound care services **Monitoring:** Monthly reporting to QAPI Committee.

### Quality Measure – Urinary Tract Infections (UTIs)

**PIP Dates:** 5/26/2021 – 10/31/2021

**Issue Identified:** Increase in UTIs linked to hydration deficits.

**Interventions Implemented:** - Hydration-focused CNA education - Increased availability of fresh water and ice - Reinforced peri-care protocols **Monitoring:** Infection surveillance tools with monthly QAPI review.

### Staffing – Recruitment and Retention

**PIP Initiated:** 2023

**Issue Identified:** Ongoing staffing shortages in a rural labor market.

**Interventions Implemented:** - Wage scale evaluation and adjustments - Engagement with nursing schools and local recruitment efforts - Enhanced onboarding and training programs - Social media recruitment strategies **Monitoring:** Monthly SmartLinx staffing and turnover reports reviewed by QAPI.

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## Crowell Nursing Center (Crowell, TX)

### Quality Measures – Mobility and ADL Decline

Multiple PIPs initiated beginning May 2021 addressing worsening mobility and increased ADL assistance needs.

**Interventions Implemented:** - CNA education on accurate documentation and restorative care - Increased therapy screening and involvement - Regular CASPER report review - Interdisciplinary team (IDT) oversight **Outcomes:** Facility performance remained below national benchmarks with continued improvement noted.

### Staffing – Recruitment and Retention

**Issue Identified:** Persistent staffing shortages due to rural location and limited workforce availability.

**Interventions Implemented:** - Job postings across multiple platforms - Partnerships with local training programs - Incentive-based recruitment initiatives - Daily staffing oversight by leadership

### Quality Measure – Falls

**Issue Identified:** Falls with major injury exceeding national averages.

**Interventions Implemented:** - Targeted fall risk identification - Staff-wide fall prevention education - Individualized care plan revisions **Monitoring:** Monthly QAPI review with variable outcomes and ongoing interventions.

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## Palo Pinto Nursing Center (Mineral Wells, TX)

### Quality Measure – Mobility Worsened

**PIP Dates:** 2021

**Issue Identified:** Increased assistance needs related to disease progression and staff over-assistance.

**Interventions Implemented:** - Staff education on promoting independence - Therapy-driven mobility programs - Monthly PIP team reviews

### Staffing – Recruitment and Retention

**PIP Dates:** 6/1/2021 – 6/1/2022

**Issue Identified:** CNA and LVN turnover and recruitment challenges.

**Interventions Implemented:** - Wage analysis and market comparison - Expanded recruitment efforts - Ongoing QAPI monitoring

### Quality Measure – Antipsychotic Medication Use

**Issue Identified:** Rising antipsychotic use related to new admissions with psychiatric diagnoses.

**Interventions Implemented:** - Admission medication audits - Staff education on psychotropic appropriateness - Ongoing pharmacy review **Outcome:** Antipsychotic usage reduced to 11.11% by December 2022.

### Quality Measure – Falls

**PIP Dates:** 9/2023 – 10/2024

**Interventions Implemented:** - Fall risk assessments within 72 hours of admission - Environmental and footwear interventions - Monthly data review through QAPI

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## Prairie House Living Center (Plainview, TX)

### Staffing – Recruitment and Retention

**PIP Dates:** 2023–2024

**Issue Identified:** Elevated staff turnover impacting staffing stability and continuity of care.

**Root Cause Analysis:** Schedule dissatisfaction, no-call/no-show events, and workforce competition.

**Interventions Implemented:** - Wage adjustments and incentive bonuses - Enhanced recognition and retention initiatives - Monthly turnover reviews through QAPI **Outcomes:** Nursing turnover reduced from >70% to below 4%, with sustained stabilization.

### Quality Measures – Antipsychotic Medication Use

**Issue Identified:** Antipsychotic usage above state benchmark.

**Interventions Implemented:** - Monthly GDR and IDT medication review meetings - Pharmacy and psychiatric collaboration - Staff education on behavioral documentation and non-pharmacologic interventions **Outcomes:** Sustained reduction in antipsychotic utilization with ongoing monitoring.

### Quality Measures – Falls and Weight Loss

**Interventions Implemented:** - Targeted fall reduction strategies for repeat fallers - Weekly and monthly weight monitoring protocols - Dietitian involvement and family/physician notification **Monitoring:** Reviewed weekly in clinical meetings and reported to QAPI.

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## Santa Fe Health & Rehabilitation Center (Weatherford, TX)

### Quality Measures – Pressure Ulcers and Weight Loss

**Issue Identified:** Pressure ulcer and significant weight loss rates exceeding national benchmarks.

**Root Cause Analysis:** Nutritional deficits, staffing instability, and limited resident stimulation during COVID restrictions.

**Interventions Implemented:** - Turning and repositioning education - Dietitian-led nutritional reviews - Enhanced activity programming - Weekly skin and weight monitoring

**Monitoring:** Weekly reports and monthly QAPI review.

### Staffing – Recruitment and Retention

**Issue Identified:** Staffing shortages affecting care delivery.

**Interventions Implemented:** - Wage surveys and market adjustments - Morale and engagement initiatives - Referral bonuses and recruitment partnerships **Monitoring:** SmartLinx staffing and turnover reports reviewed by QAPI.

## Quality Measures – Antipsychotic, Hypnotic, and Antianxiety Medication Use

**Interventions Implemented:** - Monthly medication audits and GDR reviews - Increased pharmacy and psychiatric collaboration - Staff education on non-pharmacologic interventions **Outcomes:** Medication usage reduced below national averages with sustained oversight.

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## Seymour Rehabilitation and Healthcare (Seymour, TX)

### Quality Measures – Antipsychotic Medication Use

**Issue Identified:** Inappropriate or prolonged antipsychotic use.

**Interventions Implemented:** - Monthly audits and psychiatric collaboration - GDR identification and therapy/activity referrals - Ongoing resident and family education

**Monitoring:** Monthly reporting through QAPI.

### Quality Measures – Falls

**Issue Identified:** Falls exceeding benchmark thresholds.

**Interventions Implemented:** - Quarterly staff education on fall prevention - Enhanced supervision and safety interventions - Therapy referrals for balance and mobility

**Monitoring:** Incident review and QAPI oversight.

### Health Inspections – Infection Control and Documentation

**Interventions Implemented:** - Comprehensive infection control retraining and audits - Documentation accuracy PIP with staff education and audits **Outcomes:** Compliance goals met and adopted into ongoing QAPI monitoring.

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## Conclusion

Each facility implemented targeted QAPI initiatives and Performance Improvement Projects in response to CMS Nursing Home Compare ratings of three stars or below. Actions focused on resident safety, staffing stabilization, medication management, infection control, and sustained quality outcomes. Ongoing monitoring through facility-level and corporate QAPI committees remains in place to ensure continuous compliance and improvement.

## Park View

Please see below for the summary of all SQC/IJ surveys of Park View from January 2021 to the present. I have also included G level deficiencies because most of the CMPs since 2021 have been for G level tags.

**March 29, 2022 complaint investigation** – 4 deficiencies cited

- Deficiencies at actual harm/SQC/IJ:
  - F 689 (S/S = J)
- Final remedies:
  - CMPs totaling \$37,600.

**September 7, 2023, incident investigation** – 1 deficiency cited

- Deficiencies cited at actual harm/SQC/IJ:
  - F 689 (S/S = G)
- Final remedies:
  - CMPs totaling \$12,000. Final CMP with discount - \$8,190.00.

**December 18, 2023 federal comparative survey** – 26 deficiencies cited

- Deficiencies at actual harm/SQC/IJ:
  - F 550 (S/S = G)
  - F 684 (S/S = K)
  - F 758 (S/S = J)
  - F 919 (S/S = K)
- Final remedies:
  - CMPs totaling \$162,825. Final CMP with discount - \$105,836.25

**February 1, 2024, complaint investigation** – 3 deficiencies cited.

- Deficiencies at actual harm/SQC/IJ:
  - F 600 (S/S = G)
- Final remedies:
  - CMPs totaling \$150,400. Final CMP with discount - \$97,760.00.

**September 19, 2024 complaint investigation** – 3 deficiencies cited

- Deficiencies at actual harm/SQC/IJ:
  - F 600 (S/S = G)
  - F 607 (S/S = G)
- Final remedies:
  - CMPs totaling \$26,400. Final CMP with discount - \$17,160.00

## **February 20, 2025, incident investigation – 2 deficiencies cited**

- Deficiencies at actual harm/SQC/IJ:
  - o F 600 (S/S = G)
- Final remedies:
  - CMPs totaling \$40,740.

Final CMP with discount - \$26,481.00.

## **Bristol Summary**

From 2021 to 2023 Bristol had a few surveys in which substandard deficiencies were issues by the Agency for Health Care Administration. Since that time, much has been done to ensure the safety and care of the residents and to remain in compliance moving forward. Several changes were made in key leadership positions, including the Administrator and Director of Nursing, and an outside consulting group by the name of RB Health Partners was brought in. The consulting group continues to provide ongoing regulatory and risk support, as well as education and training for multiple departments, including Nursing, Social Services, and Dietary among others.

RB Health Partners continue to play an active role in the day-to-day care and services being provided at The Bristol. A consultant from RB Health Partners reviews all incidents as well as any reportable events as they occur. Recommendations for opportunities for improvement are made as needed. The consultant group works closely with facility and corporate staff on process improvement.

Update as of 12-23-2025

Bristol Care Center is currently in substantial compliance with CMS regulations and has met all requirements for removal from the Special Focus Facility (SFF) listing. Formal removal from the SFF list occurred on November 25, 2025.

The center continues to demonstrate strong performance through its robust Quality Assurance and Performance Improvement (QAPI) program and ongoing consultation with RB Health Partners. Bristol Care Center maintains a dedicated Risk Manager, Nurse Consultant and a stable interdisciplinary team with no leadership vacancies. Additionally, the center achieved and has sustained its goal of becoming agency-free, reflecting enhanced staff stability, team growth, and improved morale.

CMS Nursing Home Compare

The facility's star rating on the Nursing Home Compare website is still unavailable- we expect this to change in January with the next refresh. The facility is close to being two stars

for health inspections and is projected to be three stars for staffing and four stars for quality measures. The facility has remained agency-free and continues to focus on retention to prevent turnover. Short-stay and long-stay quality measures are reviewed monthly in QAPI meetings, and performance improvement plans are in place for any needed areas.

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# Attachment T

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Advanced Rehabilitation and Healthcare of Bowie - 700 W. US Highway 287 South, Bowie, TX 76230 - 7/1/2021 - Present

Clyde Nursing Center - 806 Stephens St, Clyde, TX 79510 - 7/1/2021 - Present

Crowell Nursing Center - 200 South B Ave, Crowell, TX 79227 - 7/1/2021 - Present

Palo Pinto Nursing Center - 200 SW 25th Ave, Mineral Wells, TX 76067 - 7/1/2021 - Present

Park View Care Center - 3301 View Street, Fort Worth, TX 76103-2499 - 7/1/2021 - Present

Prairie House Living Center - 1301 Mesa Drive, Plainview, TX 79072 - 7/1/2021 - Present

Santa Fe Health & Rehabilitation Center - 1205 Santa Fe Drive, Weatherford, TX 76086 - 7/1/2021 - Present

Seymour Rehabilitation and Healthcare - 1110 Westview Dr, Seymour, TX 76380 - 7/1/2021 - Present

Whitehall Rehab & Nursing - 1116 E Loop 304, Crockett, TX 75835 - 7/1/2021 - Present

The Bristol Care Center - 1818 E Fletcher Ave, Tampa, FL 33612-3770 - 2/11/2021 – Present

Community Care Center of Crockett - 1150 E Loop 304, Crockett, TX 75835 - 7/1/2021 - 1/1/2022

#### Florida facilities Manager

Apollo Healthcare & Rehabilitation Center - 1000 24Th St N, Saint Petersburg, FL 33713 - 7/27/2022 – November 30, 2022

Carlton Shores Healthcare And Rehabilitation Cente - 1350 S Nova Rd, Daytona Beach, FL 32114 - 7/27/2022 – November 30, 2022

The Club Healthcare And Rehabilitation Center At The Villages - 16529 SE 86Th Belle Meade Circle, The Villages, FL 32162 - 7/27/2022 – November 30, 2022

Gardens Healthcare & Rehabilitation Center - 1704 Huntington Village Circle, Daytona Beach, FL 32114 - 7/27/2022 – November 30, 2022

Greenbriar Healthcare Rehabilitation And Nursing Center - 210 21St Ave W, Bradenton, FL 34205 - 7/27/2022 – January 1, 2023

Isle Healthcare & Rehabilitation Center - 1125 Fleming Plantation Blvd, Orange Park, FL 32003 - 7/27/2022 – November 30, 2022

Kendall Lakes Healthcare And Rehab Center - 5280 SW 157 Avenue, Miami, FL 33185 - 7/27/2022 -January 1, 2023

Lehigh Acres Healthcare & Rehab Center - 1550 Lee Boulevard, Lehigh Acres, FL 33936 - 7/27/2022 – January 1, 2023

Lexington Healthcare And Rehabilitation Center - 6300 46Th Ave N, Saint Petersburg, FL 33709 - 7/27/2022 – November 30, 2022

North Beach Healthcare And Rehabilitation Center - 2201 NE 170Th Street, North Miami Beach, FL 33160 - 7/27/2022 – December 20, 2022

North Lake Care Center And Rehab - 750 Bayberry Drive, Lake Park, FL 33403 - 7/27/2022 – December 20, 2022

Park Meadows Healthcare & Rehabilitation Center - 3250 SW 41St Place, Gainesville, FL 32608 - 7/27/2022 – November 30, 2022

Riverwood Healthcare & Rehabilitation Center – 808 S Colley Road, Starke, FL 32091 - 7/27/2022 – November 30, 2022

Rockledge Healthcare & Rehabilitation Center - 587 Barton Blvd, Rockledge, FL 32955 - 7/27/2022 – November 30, 2022

South Campus Care Center And Rehab - 715 E Dixie Ave, Leesburg, FL 34748 - 7/27/2022 – November 30, 2022

Sunset Lake Healthcare And Rehabilitation Center - 832 Sunset Lake Boulevard, Venice, FL 34292 - 7/27/2022 – January 1, 2023

Terrace Healthcare & Rehabilitation Center - 7207 SW 24Th Ave, Gainesville, FL 32608 - 7/27/2022 – November 30, 2022

The Lodge Healthcare And Rehabilitation Center - 635 SE 17Th Street, Ocala, FL 34471 - 7/27/2022 – November 30, 2022

The Ponce Therapy Care Center And Rehab - 1999 Old Moultrie Road, Saint Augustine, FL 32086 - 7/27/2022 – November 30, 2022

Villa Healthcare & Rehabilitation Center - 120 Chipola Ave, Deland, FL 32720 - 7/27/2022 – November 30, 2022

Village Place Healthcare And Rehabilitation Center - 2370 Harbor Blvd, Port Charlotte, FL 33952 - 7/27/2022 – January 1, 2023

Wilton Manors Healthcare & Rehabilitation Center - 2675 N Andrews Ave, Wilton Manors,  
FL 33311 - 7/27/2022 – January 1, 2023

Woodland Grove Healthcare & Rehabilitation Center - 4325 Southpoint Boulevard,  
Jacksonville, FL 32216 - 7/27/2022 – November 30, 2022

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# Attachment U

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## **Attachment V**

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## **Attachment W**

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