



Ms. Linda Cole
Maryland Department of Health
Maryland Health Care Commission
Chief of Long Term Care Policy and Planning
4160 Patterson Avenue
Baltimore, MD 21215

January 4, 2019

Dear Ms. Cole:

I am writing to you today as a Licensed Nursing Home Administrator of CommuniCare's Anchorage Nursing and Rehabilitation Center, a 126 bed nursing center in Salisbury, Maryland. We currently take care of an average of 110 residents on a daily basis and we employ just north of 100 regular Full, Part and PRN employees. Anchorage is located adjacent from Peninsula Regional Medical Center and because of this location and our services provided; we play a very key role in the Long Term Care health care market in this community.

On behalf of Anchorage Nursing and Rehabilitation Center, below are the comments to COMAR 10.24.20 *State Health Plan for Facilities and Services: Comprehensive Care Facilities Services*, as promulgated in the Maryland Register on December 7th. It is my understanding that the Maryland Health Care Commission is recommending that applications to build new skilled nursing centers in that state could be submitted without evidence of demographic need. While I understand that our state health system needs a thorough revamp to help eliminate burdensome restrictions and regulations, I am strongly opposed to this problematic provision.

The CON process in Maryland has long been based on granting a need once identified to help a particular jurisdiction. When providers are unable to care for those in need, the MHCC authorizes additional beds or other services to assist a community that requested action. Currently in the State of Maryland, skilled nursing facilities on average are operating at an occupancy rate below 90%. There is no known need for additional beds to any jurisdiction throughout the state. By recommending that a skilled nursing facility can be granted absent of any demographic need, the purpose of CON is essentially counterproductive.

Moreover, at Anchorage, our center operates at our best when census is high and beds are filled. We constantly work in tandem with hospitals and other referral sources to place residents in our facility, where they can reach their maximum potential through rehab and other services and return to their home as soon as possible. While some individuals are often strong enough to go home after a hospital stay, others have complex medical conditions that need further rehab at a skilled nursing facility for continuous care. These residents rely on us to operate efficiently and give them the highest quality of care. However, by allowing new centers to be built without proven need, it will result in excess beds, which can possibly lead to provider's inability to operate centers efficiently. This could also lead to staff layoffs and possible closure of centers. For all the reasons stated above, I am asking that the MHCC to withdrawal this recommendation, as I strongly believe that this regulation will decrease the quality of care for our Maryland residents.



Please feel free to contact me with any questions or concerns that you may have. I can be reached at either (410) 749-2474 or via email at dwolfberg@chs-corp.com.

Thank you for your time and consideration in this matter,

Sincerely,

Daniel B. Wolfberg, NHA

Daniel B. Wolfberg, NHA
Executive Director – Anchorage Nursing & Rehabilitation Center

Cc: CommuniCare Government Relations Department

Sent via email – Hard copy to follow