

January 2, 2019

Dear Ms. Cole:

I am writing to you today as a Licensed Nursing Home Administrator of CommuniCare's Forestville Health and Rehabilitation Center, a 162 bed skilled nursing center in Forestville, MD. I currently employ over 180 staff members and currently caring for 150 residents out of 162 maximum bed capacity. The majority of the population requires extensive to total care and assistance, including post-acute medical/surgical care and rehab, which is provided 24 hour per day/7 days per week. We also provide long-term care to a population of over 100 for those that cannot be cared for at home.

Forestville Health and Rehabilitation Center is unique in that this facility is the only skilled nursing facility in the Forestville/District Height Community, serving a population of 12,000 per the most recent data. This is very important to the resident's and families we serve in our community; facilitating a "home away from home" atmosphere for most. Not only does the facility care for the community member's during periods of declining health, it also employs the residents of the community, helping to keep the community striving. Additionally, Forestville Health and Rehabilitation is honored to announce holding a standing contract with the Veterans Administration, serving veterans throughout DC, Maryland and Virginia since 2008. We hold this honor with the highest regards being chosen to care for those who've bravely fought for our freedoms.

On behalf of Forestville Health and Rehabilitation Center, below are comments to COMAR 10.24.20 *State Health Plan for Facilities and Services: Comprehensive Care Facility 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 the 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 Forestville Health and Rehabilitation Center, 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 reasons stated above, I am asking that the MHCC withdraws this recommendation, as I strongly believe that this regulation will decrease the quality of care for Maryland residents.

Please feel free to contact me with any questions or concerns that you may have.

Have a great day.

Sincerely,

Sytina Smith, LNHA RN
Senior Executive Director
Forestville Health and Rehabilitation Center