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Revisions to COMAR 10.24.20

1 message

Roques, Carmel <RoquesC@choosekeswick.org>

Fri, Jan 4, 2019 at 5:05 PM

To: "linda.cole@maryland.gov" <linda.cole@maryland.gov>

Cc: "kheffner@lifespan-network.org" <kheffner@lifespan-network.org>, "dkauffman@smwpa.com" <dkauffman@smwpa.com>

Linda Cole, Chief

Long Term Care Planning Commission

Maryland Health Care Commission

4160 Patterson Avenue

Baltimore, MD 21215-2299

Dear Ms. Cole:

As the current Chair of the Board of LifeSpan Network I fully support the comments in the attached letter regarding COMAR 10:24.20 State Health Plan for Facilities and Services.

However, today I am writing to you as the President/CEO of Keswick, a non-profit, mission based organization that owns and operates a 242 bed Medicare /Medicaid certified nursing home in Baltimore City. Keswick is unique for a city nursing home with many services and amenities not typical of a nursing home serving a high Medicaid population such as a high patient to staff ratio, on site physician practice, all private rooms, an art studio, library, and auditorium. Over the last 6 months we have had an average daily census of 181 Medicaid patients, 25 Medicare patients, and 2.5 private/managed care patients for a total of 208 of 242 occupied beds. Over the past 4 years we have seen a steady decline in occupancy due to fewer admissions and shorter lengths of stay. Keswick works closely with our referring hospitals to keep re-admissions well below the state average and to accept sicker, less stable patients. I think Keswick's experience as a well-respected nursing home provider with a trend of lower occupancy demonstrates that there is no shortage of nursing home beds available for Medicare or Medicaid patients. As Maryland transforms its health care delivery and payment model to meet Total Cost of Care objectives there is a fundamental misalignment with regulations that loosen restrictions on nursing home bed construction and cause further pressure on existing quality providers.

I hope you will give this some consideration as you make decisions. Thank you for all you do to improve and preserve quality of life of our oldest and most vulnerable citizens.

Your work and service is appreciated.

Sincerely,