

March 30, 2012

Ms. Lisa Pittman, Project Analyst  
Mr. Craig Smith, Section Chief  
Certificate of Need Section  
Division of Health Service Regulation  
NC Department of Health and Human Services  
809 Ruggles Drive  
Raleigh, North Carolina 27603

Re: Comments on Competing Nursing Care Facility Bed Certificate of Need Application  
Filed by: Universal Health Care / Brunswick, Inc. and Universal Properties /  
Brunswick, LLC, Project ID #**O-8780-12** (Universal-Brunswick)

Dear Ms. Pittman and Mr. Smith:

On behalf of Smithville Township, d/b/a J. Arthur Doshier Memorial Hospital (Doshier), thank you for the opportunity to comment on the above referenced application. Doshier has filed competing application, Project ID: **O-8779-12**. During your review of the projects in this batching cycle, I appreciate your favorable consideration of our comments.

We recognize that the State's Certificate of Need (CON) award for the proposed nursing care facility beds will be based upon the State's CON health planning objectives, as outlined in N.C.G.S. 131E-183. Specifically, we respectfully request that the CON Section give careful consideration to the extent to which Universal-Brunswick offers service accessibility to all service area residents and documents the availability of necessary ancillary and support services. We believe the application is non-conforming on five statutory review criteria and because a better alternative is available it is non-conforming on a sixth, Review Criterion 4.

**ACCESS TO THE UNDERSERVED**

The application is non-conforming to Review Criterion (13a). In Federal Fiscal Year (FY) 2011, Universal-Brunswick provided only 39.0 percent of its total resident days to Medicaid recipients. The FY 2011 Brunswick County average reported in the 2012 Nursing Home Licensure Renewal Applications was 67.5 percent and the FY 2010 statewide average reported by the North Carolina Division of Medical Assistance (DMA) was 67.2 percent. Please see Attachment C. As such, Universal-Brunswick's current Medicaid access is more than 28 percentage points and more than 40 percent below both the Brunswick County and statewide averages [67.5% - 39.0% = 28.5%; 28.5%/67.5% = 42%] [67.2% - 39.0% = 28.2%; 28.2%/67.2% = 42%]. Therefore, the applicants did not demonstrate that they provide adequate access to the medically underserved, as requested in N.C.G.S. 131E-183 (13a).

Universal-Brunswick's application is also non-conforming to Review Criterion (13c). Universal-Brunswick's proposed Medicaid share of resident days (54.6 percent) is 12.9 percentage points [67.5% - 54.6% = 12.9%] and 19.1 percent [12.9%/67.5% = 19.1%] below the FY 2011 Brunswick County average (67.5%). Therefore, the applicants did not demonstrate that medically underserved groups will have adequate access to the proposed services, as requested in N.C.G.S. 131E-183 (13c).

In the February 2012 Wake County nursing care facility decision, the CON Section found a related Universal application (J-8714-11) non-conforming to Review Criterion (13c) for projecting Medicaid days 6.68 percentage points below the current Wake County average. The CON Section also found application J-8719-11 non-conforming to Review Criterion (13a) for existing Medicaid utilization that was 20 percentage points and 35 percent below the current Wake County and statewide averages.

Moreover, Universal-Brunswick's application proposes to reduce, by approximately 740 days, the amount of Alzheimer's Special Care Unit days available to Medicaid residents. Because the application does not demonstrate reduced need or alternative arrangements for these residents, it is non-conforming with Review Criterion (3a).

#### APPLICANT COMPARISON

By contrast, the Doshier application meets all statutory review criteria and, based upon an examination of quantitative indicators presented in both applications submitted for the beds, it is the most effective. Doshier's proposal:

- Expands access to Brunswick County's only five-star, deficiency-free nursing care facility, with a minimal capital investment;
- Offers the most access to Medicaid beneficiaries (69.75 vs. 54.55 percent);
- Offers the highest RN and LPN NHPPD (1.14 vs. 1.04);
- Offers the highest total NHPPD (3.93 vs. 3.47);
- Offers the highest total compensation for DON, RNs, and CNAs;
- Offers the highest total compensation for ancillary staff; and
- Ensures the viability of an essential rural healthcare provider by reducing the subsidy currently being born by the acute part of the hospital.

#### ATTACHMENTS

Attached to this cover letter are two documents (Attachment A and B). The first document provides a more detailed discussion of the advantages of the Doshier application in the context of the Basic Principles Governing Development of the 2012 State Medical Facilities Plan (*2012 SMFP*). There also is a short discussion on Universal-Brunswick's claim that Doshier can fix its current utilization problem by utilizing *2012 SMFP* Policy NH-1.

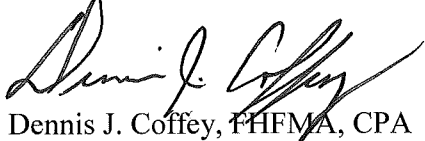
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The second document is an analysis of the competing application discussed within the framework of the State's CON Review Criteria. In the analysis, we have addressed only those criteria for which we believe the information provided is non-conforming. Please feel free to call me if you have any questions.

Sincerely,



Dennis J. Coffey, FHFMA, CPA  
Senior Vice President / Chief Financial Officer  
J. Arthur Doshier Memorial Hospital  
924 North Howe Street  
Southport, North Carolina 28461  
910-457-3912

Attachments:

Attachment A - Detailed applicant comparison

Attachment B - Noncompliance with CON Review Criteria

Attachment C - FY 2010 DMA Cost Report Summary and 2012 Nursing Home Licensure Renewal Payor Mix Summary

Attachment D - Medicare Nursing Home Compare Scores as of March 26, 2012

## **Attachment A**

Detailed applicant comparison

**ATTACHMENT A**  
**DETAILED APPLICANT COMPARISON**

Smithville Township, d/b/a J. Arthur Doshier Memorial Hospital (Doshier) proposes to convert 14 unused adult care beds to 14 nursing care facility beds to create a 64-bed nursing care facility in Southport, North Carolina. Universal Properties/Brunswick, LLC and Universal Health Care/Brunswick, Inc. (Universal-Brunswick) proposes to construct 14 new nursing home beds to create a 104-bed nursing care facility in Bolivia, North Carolina.

**POLICY GEN-3: BASIC PRINCIPLES - QUALITY, ACCESS, VALUE**

**OVERVIEW**

Policy GEN-3 sets the framework for the 2012 SMFP and for CON applications filed in response to a need identified in the 2012 SMFP. It requires documentation of how a project will balance quality, access and value. Specifically, it notes:

*A certificate of need applicant applying to develop or offer a new institutional health service for which there is a need determination in the North Carolina State Medical Facilities Plan shall demonstrate how the project will promote safety and quality in the delivery of health care services while promoting equitable access and maximizing healthcare value for resources expended. A certificate of need applicant shall document its plans for providing access to services for patients with limited financial resources and demonstrate the availability of capacity to provide these services. A certificate of need applicant shall also document how its projected volumes incorporate these concepts in meeting the need identified in the State Medical Facilities Plan as well as addressing the needs of all residents in the proposed service area. [2012SMFP page 40] Emphasis added.*

This requirement references back to the Basic Principles Governing Development of the 2012 SMFP, found on pages 2 through 4.

**QUALITY**

*REQUIREMENTS*

The 2012 SMFP gives applicants latitude with regard to demonstrating promotion of safety and quality, but the Policy specifically requires that an applicant shall demonstrate how it will promote quality while retaining access. The 2012 SMFP also asks the CON Section to not only make sure applicants provide information on their safety and quality initiatives but that the CON Section validate the effectiveness of these programs using standardized metrics that are widely reported and available at the national level.

2012 SMFP page 2 states:

*“To warrant public trust in the regulation of health services, monitoring of safety and quality using established and independently verifiable metrics will be an integral part of the formulation and application of the North Carolina State Medical Facilities Plan.” Emphasis added.*

In nursing care facility reviews, the CON Section can, and should, use Medicare Nursing Home Compare scores as a metric to compare existing nursing care facility providers. All Medicare certified nursing care facilities in the United States receive Medicare Nursing Home Compare scores.

A review of the applicants' Medicare Nursing Home Compare scores will show Doshier as the most favorable applicant for safe and quality nursing care facility services.

*CLINICAL OUTCOMES*

The Basic Principles, on page 2 of the 2012 SMFP, notes that comparing clinical outcomes is an effective way to measure quality. Comparing the two applicants, Doshier scores the highest on current Medicare Nursing Home Compare clinical outcome measures.

**Table 1 – Medicare Nursing Home Compare Clinical Outcome Measures**

<b>Applicant</b>	<b>Quality Measures Star Rating</b>
Doshier	5.0
Universal-Brunswick	4.0

*Source: Medicare.gov/NHCompare, accessed 3/26/12. See Attachment D.*

Doshier has never received less than a 5.0 on this metric.

*SAFETY MEASURES*

When considering external benchmarks of resident safety, Medicare Nursing Home Compare health inspection data is routinely sought as a primary measurement of overall resident safety. The health inspection rating contains information from the last three years of onsite inspections, including both standard surveys and any complaint surveys. This information is gathered by individuals who go onsite to the nursing care facility and follow prescribed protocols in order to determine the extent to which each nursing care facility has met Medicare's minimum quality safety requirements.

Comparing the two applicants, Doshier scores the highest on current Medicare Nursing Home Compare health inspections measures.

**Table 2- Medicare Nursing Home Compare Health Inspections**

<b>Applicant</b>	<b>Health Inspections Star Rating</b>
Doshier	5.0
Universal-Brunswick	2.0

*Source: Medicare.gov/NHCompare, accessed 3/26/12. See Attachment D.*

Doshier has never received less than a 5.0 on this metric and has received deficiency free inspections for the last five years. As such, Doshier is currently fully compliant with all State and Federal rules and regulations.

## NURSE STAFFING

Nurse staffing is the final metric that Medicare Nursing Home Compare evaluates to determine a nursing care facility's overall Star Rating.

Comparing the two applicants, Dosher scores the highest on current Medicare Nursing Home Compare staffing and has never received less than a 5.0 on this metric.

**Table 3- Medicare Nursing Home Compare Nursing Home Staffing**

<b>Applicant</b>	<b>Nursing Home Staffing Star Rating</b>
Dosher	5.0
Universal-Brunswick	4.0

Source: Medicare.gov/NHCompare, accessed 3/26/12. See Attachment D.

A facility's nurse staffing rating is tied to its Nursing Hours per Patient Day (NHPPD). While not totally conclusive, a number of studies suggest that facilities with higher NHPPD have better clinical outcomes. The studies also suggest that a facility with more RNs and LPNs will have better clinical outcomes<sup>1</sup>. Comparing the two applicants, Dosher proposes the highest total NHPPD and RN + LPN NHPPD.

**Table 4 – Nursing Hours per Patient Day – Project Year 2**

<b>Applicant</b>	<b>Total NHPPD</b>	<b>RN + LPN NHPPD</b>
Dosher	3.93	1.14
Universal-Brunswick	3.47	1.04

Source: Table VII.4

## OVERALL

Comparing the two applicants, Dosher has the highest overall Medicare Nursing Home Compare Star Rating and has never received less than a 5.0 on this metric.

**Table 5- Medicare Nursing Home Compare Overall Rating**

<b>Applicant</b>	<b>Overall Star Rating</b>
Dosher	5.0
Universal-Brunswick	3.0

Source: Medicare.gov/NHCompare, accessed 3/26/12. See Attachment D.

<sup>1</sup> Sean P. Clarke and Nancy E. Donaldson. *Chapter 25: Nurse Staffing and Patient Care Quality and Safety*. <http://www.ncbi.nlm.nih.gov/books/NBK2676/>. National Center for Biotechnology Information. Accessed 3/5/2012.

As a result of Doshier’s sustained quality care, Doshier is consistently recognized as one of the nation’s top nursing care facilities. In February 2010, Doshier Nursing Center was named as "One of the Best Nursing Homes in America" by US News & World Report. In all, only 173 of the nation’s 15,500 nursing facilities were accorded the Best in America honor. Only four facilities received the designation in the entire state of North Carolina. Also, in February 2012, US News & World Report named Doshier on its 2012 Nursing Home Honor Roll. Only 39 of the nation’s 15,500 nursing care facilities made this prestigious list, and Doshier was the only facility in the Southeast United States to make the list.

Furthermore, because of Doshier’s reputation, the Doshier Nursing Center maintains a 40-60 person waiting list and consistently operates at, or near, 100 percent occupancy. Over the last nine months Universal – Brunswick operated with approximately eight open beds.

**ACCESS**

*REQUIREMENTS*

The Access Basic Principle discussion on page 2 of the 2012 SMFP notes that barriers include: geography, low income, limited or no insurance coverage, disability, age, race, ethnicity, culture, language, education and health literacy. “The [2012 SMFP’s] first priority is to ameliorate economic barriers.” [2012 SMFP page 2] The Access Basic Principle also states that “the needs of rural and small communities that are distant from comprehensive medical facilities merit special consideration.” [2012 SMFP page 3]

*ECONOMIC*

Economic barriers associated with accessing nursing facility care are disproportionately experienced by persons covered by Medicaid. According to the most recently submitted license renewal applications, the Brunswick County average for Medicaid days as a percentage of total days in Federal Fiscal Year (FY) 2011 was 69.75 percent. As referenced below, the Doshier application provides the most access to Medicaid beneficiaries.

**Table 6 –Medicaid Days as a Percentage of Total Days Project Year 2**

<b>Applicant</b>	<b>Percent Medicaid</b>
Doshier	69.75%
Universal-Brunswick	54.55%

Source: Table VI.3



## *RURAL*

Dosher Nursing Center is a department of J. Arthur Dosher Memorial Hospital. Dosher Hospital is in Southport, North Carolina and is the Critical Access Hospital that serves Southeastern Brunswick County. Centers for Medicare and Medicaid Services (CMS) has attested to the importance of Dosher as a provider of appropriate rural health care access by deeming it qualified to meet the rigorous CMS Critical Access Hospital rules.

To strengthen Dosher's long term viability, including acute and emergency services, Dosher needs to increase efficiency of the nursing care facility. According to proforma financial projections for this project, conversion of the 14 poorly used adult care beds to high demand nursing care facility beds would reduce Dosher Nursing Center's annual subsidy from acute operations by almost \$200,000 by Project Year 2.

## **VALUE**

### *REQUIREMENTS*

The Value Basic Principle discussion on page 3 of the *2012 SMFP* notes that the State Health Coordinating Council (SHCC) defines health care value as maximum health care benefit per dollar expended, separating the metrics into cost and benefit measurements, and emphasizing the importance of balance between the two.

### *OPERATING COSTS*

Because the Dosher Nursing Center is a department of a Critical Access Hospital, operating costs per resident day should not be compared in this review. Per Medicaid cost reporting rules, Dosher allocates nursing care facility costs from hospital costs based on a statistical cost allocation methodology provide by the Division of Medical Assistance. The model assigns costs to the nursing care facility based on factors that do not directly relate to resident day volumes, such as the number of square feet in the facility. These allocators are not perfect and can overstate the nursing care facility's true costs.

### *CAPITAL COSTS*

Dosher's projected capital costs are approximately \$800,000 less than Universal-Brunswick's. Implicit in the Value Basic Principle is an idea that under certain circumstances it is acceptable to have higher capital costs, but only if there is an added population benefit. Dosher does not believe that Universal-Brunswick's proposed capital costs justify the higher capital costs. A close examination of Universal-Brunswick's projected utilization shows that Universal-Brunswick will fill all of its semi-private beds but will not fill all of its private beds. Universal-Brunswick proposes to utilize only two of the proposed four new Alzheimer's Special Care Unit beds. Universal-Brunswick also proposes to leave three of its private basic nursing beds empty. Please see Table 7 below. As such, it does not appear that Universal-Brunswick values private beds over semi-private beds. Furthermore, Dosher's sustained five-star rating is a testament to the fact that private rooms are not necessary to provide safe, quality nursing care services.

**Table 7 –Proposed Universal-Brunswick Bed Utilization - Project Year 2**

Notes		SCU Pvt Beds	SCU Semi- Pvt Beds	Basic Nursing Semi-Pvt Beds	Basic Nursing Pvt Beds
a	Total Resident Days	730	7,300	18,980	9,125
b	Total Beds	4	20	52	28
c	Projected Beds Occupied	2	20	52	25
d	Beds Empty	2	0	0	3

Notes:

- a Table IV.3, Universal-Brunswick application pages 65 and 66
- b Line Drawing, Universal-Brunswick application Exhibit 17
- c a/365
- d b-c

*BENEFIT*

On page 3 of the 2012 SMFP, the Value discussion notes that measuring benefit is more difficult and states the importance of evidence-based metrics.

Better salaries and benefits along with higher staffing levels have been associated with reduced turnover.<sup>2</sup> As shown below, a recent study sponsored by the American Association of Retired People (AARP) and The Commonwealth Fund, showed that reduced turnover is positively correlated to increased quality.

*In 2008, the average one-year nursing home staff turnover rate (the ratio of full- and part time employee terminations that occurred during the year, regardless of cause, to the average number of active employees on the payroll during the same period) for all nursing staff was 49 percent. The five top-performing states reported LPN and CNA turnover rates ranging from 16 to 38 percent and RN turnover rates between 25 and 35 percent. The bottom five states reported LPN and CNA turnover rates ranging from 52 to 93 percent and RN turnover rates between 40 and 79 percent.<sup>3</sup>*

**Dosher proposes the highest total salaries and benefits for DON, RNs, and CNAs.**

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<sup>2</sup> Leadership Council of Aging Organizations. *The Direct Care Workforce: A Report to Promote Quality Long Term Care*. March 5, 2009. All Health Reports online. [www.allhealth.org/.../LCAODirectCareWorkforceReport.pdf](http://www.allhealth.org/.../LCAODirectCareWorkforceReport.pdf). Accessed September 28, 2011.

<sup>3</sup> Susan C. Reinhard, Enid Kassner, Ari Houser, and Robert Mollica. *Raising Expectations: A State Scorecard on Long-Term Services and Supports for Older Adults, People with Physical Disabilities, and Family Caregivers*, September 2011 Commonwealth Fund Reports on line. <http://www.longtermscorecard.org/Report.aspx> accessed September 22, 2011

**Table 8 – Total Salaries and Benefits for Nursing Staff**

	<b>Dosher</b>	<b>Universal-Brunswick</b>
Director of Nursing (DON)	<b>\$99,681</b>	\$96,211
Registered Nurse (RN)	<b>\$65,535</b>	\$65,198
Licensed Practical Nurse (LPN)	\$52,496	\$53,100
Certified Nursing Assistant (CNA)	<b>\$30,448</b>	\$26,088

Source: Salaries from Table VII.3 \* Avg. Benefits Percentage (Dosher = 23.5% and Universal-Brunswick = 20.1%)

Support staff plays a critical role in quality of life and quality of care for nursing care facility residents. Housekeeping’s role in maintaining clean surfaces contributes to infection control and impacts the resident’s quality of life. A Dietary Aide’s responsibility to check for compliance with prescribed dietary regimens for each resident affects resident outcomes for chronic conditions such as diabetes, hypertension, and obesity. Better salaries and wages for these staff reduce turnover and contribute to more cumulative training time. The Dosher application provides the best compensation to support staff.

**Table 9 – Total Salaries and Benefits of Support Staff**

	<b>Dosher</b>	<b>Universal-Brunswick</b>
Food Supervisor	<b>\$72,000</b>	\$45,448
Cooks	<b>\$23,691</b>	\$21,029
Dietary Aides	<b>\$20,176</b>	\$17,686
Social Services Director	<b>\$53,000</b>	\$43,410
Activity Director	<b>\$38,500</b>	\$24,170
Housekeeping Supervisor	<b>\$49,775</b>	\$23,629
Housekeeping Aides	<b>\$21,400</b>	\$16,224

Source: Salaries from Table VII.3 \* Avg. Benefits Percentage (Dosher = 23.5% and Universal-Brunswick = 20.1%)

**POLICY NH-1**

On Universal-Brunswick application page 1, Universal-Brunswick makes a statement that Dosher can easily solve its utilization problem by converting up to 10 of its acute care beds to nursing care facility beds using Policy NH-1. This is not a true statement. Policy NH-1 states:

*“Hospitals designated by the State of North Carolina as Critical Access Hospitals pursuant to section 1820 (f) of the Social Security Act, as amended, can only apply for beds under this policy if the hospital has not been allocated nursing care beds under provisions of G.S. 131E 175-190.”*

Dosher was granted 50 nursing care facility beds under provisions of G.S. 131E 175-190.

## **Attachment B**

Noncompliance with CON Review Criteria

**ATTACHMENT B**  
**NONCOMPLIANCE WITH CON REVIEW CRITERIA**

**UNIVERSAL PROPERTIES/BRUNSWICK, LLC AND UNIVERSAL HEALTH  
CARE/BRUNSWICK, INC., O-8780-12  
(UNIVERSAL-BRUNSWICK)**

- 3a. In the case of a reduction or elimination of a service, including the relocation of a facility or a service, the applicant shall demonstrate that the needs of the population presently served will be met adequately by the proposed relocation or by alternative arrangements, and the effect of the reduction, elimination or relocation of the service on the ability of low income persons, racial and ethnic minorities, women, handicapped persons, and other underserved groups and the elderly to obtain needed health care.**

The applicants propose to decrease Medicaid access to their Alzheimer's Special Care Unit. On application page 71, Table VI.2, the applicants state that 74.37 percent of Universal-Brunswick's Federal Fiscal Year (FY) 2011 Alzheimer's Special Care Unit resident days were Medicaid. Assuming this same percentage and annualizing Universal-Brunswick's resident days for the last nine months, provided on application page 59, Table IV.1, Universal-Brunswick will provide 5,120 days of Medicaid Special Care from April 1, 2011 to March 30, 2012 [ $5,163/9*12*0.7437=5,120$ ]. On application page 72, Table VI.2, the applicants state that 54.55 percent of Universal-Brunswick's Alzheimer's Special Care Unit resident days will be Medicaid in Project Year 2. Data in Section IV.3 indicate this is equivalent to 4,380 days. The difference between the two, 740 days, represents a reduction in total days of Special Care provided to Medicaid residents with Alzheimer's or related dementia.

As such, the project will result in a reduction of care to an underserved group, and the application provides no explanation of alternative services that render the care unneeded. Therefore, the application is non-conforming to this Review Criterion.

- 4. Where alternative methods of meeting the needs for the proposed project exist, the applicant shall demonstrate that the least costly or most effective alternative has been proposed.**

The application is non-conforming to other applicable statutory Review Criteria. Therefore, the applicants did not demonstrate that the most effective alternative has been proposed. As a result, the application is non-conforming to this Review Criterion. Please see discussion in Review Criterion (3a), (8), (13a), (13c) and (18a).

**8. The applicant shall demonstrate that the provider of the proposed services will make available, or otherwise make arrangements for, the provision of the necessary ancillary and support services. The applicant shall also demonstrate that the proposed service will be coordinated with the existing health care system.**

The application is non-conforming to this Review Criterion. The applicants fail to demonstrate that that the provider of the proposed services will make available, or otherwise make arrangements for, the provision of the necessary ancillary and support for the following reasons:

- On application page 82, Table VII.3, the applicants state that the proposed facility will utilize a dietician consultant. However, the applicants do not provide documentation of a dietician's availability/ interest or an existing contract with an area provider to provide dietician services, as required by application question II.4.(b).
- On application page 82, Table VII.3, the applicants state that the proposed facility will utilize a pharmacy consultant. However, the applicants do not provide documentation of a pharmacist's availability/ interest or an existing contract with an area provider to provide pharmacy consulting services, as required by application question II.4.(b).
- On application page 38, Table II.4, the applicants state that the proposed facility will utilize Nextwave for laboratory services. However, the applicants do not provide documentation of Nextwave's availability/ interest or a copy of their existing contract with Nextwave, as required by application question II.4. (b). This is important because 10A NCAC 13D .2504 requires nursing facilities to provide or obtain clinical laboratory services.
- On application page 17, the applicants state that the proposed facility will provide radiology services on-site. However, the applicants do not provide documentation of a radiology provider's availability/ interest or an existing contract with an area provider to provide radiology services, as required by application question II.4.(b). This is important because 10A NCAC 13D .2504 requires nursing facilities to provide or obtain clinical radiology services.

In past nursing care facility CON reviews, the CON Section has found applicants non-conforming to this Review Criterion for similar documentation omissions. Please see the findings for application F-8059-08.

13. The applicant shall demonstrate the contribution of the proposed service in meeting the health-related needs of the elderly and of members of medically underserved groups, such as medically indigent or low income persons, Medicaid and Medicare recipients, racial and ethnic minorities, women, and handicapped persons, which have traditionally experienced difficulties in obtaining equal access to the proposed services, particularly those needs identified in the State Health Plan as deserving of priority. For the purpose of determining the extent to which the proposed service will be accessible, the applicant shall show:

- (a) The extent to which medically underserved populations currently use the applicant's existing services in comparison to the percentage of the population in the applicant's service area which is medically underserved;

As shown in the table below, during FY 2011, Universal-Brunswick provided 39.0 percent of its total nursing resident days to Medicaid recipients, which is more than 28 percentage points and more than 40 percent below both the Brunswick County and statewide averages [67.5% - 39.0% = 28.5%; 28.5%/67.5% = 42%] [67.2% - 39.0% = 28.2%; 28.2%/67.2% = 42%]. Therefore, the applicants did not demonstrate that they provide adequate access to the medically underserved, and the application is non-conforming to this Review Criterion.

**Table 1 – Current Brunswick County Medicaid Nursing Facility Days as a Percent of Total Nursing Facility Days**

Facility	Medicaid Nursing Facility Days as a % of Total Nursing Facility Days
Autumn Care of Shallotte	76.5%
Brunswick Cove Nursing Center	73.5%
J. Arthur Doshier Memorial Hospital	62.2%
Ocean Trail Healthcare & Rehabilitation Center	55.8%
<b>Universal Health Care/Brunswick</b>	<b>39.0%</b>
<b>FY 2011 Brunswick County Average</b>	<b>67.5%</b>
<b>FY 2010 Statewide Average</b>	<b>67.2%</b>

Source: Facility and County Data: 2012 Nursing Licensure Renewal Applications  
 State Data: FY 2010 Medicaid Cost Report Summary from NC DMA. Please see Attachment C.

- (c) That the elderly and the medically underserved groups identified in this subdivision will be served by the applicant's proposed services and the extent to which each of these groups is expected to utilize the proposed services; and

In Section IV.3, the applicants project the following payor mix for Universal-Brunswick's nursing care facility beds during the second full federal fiscal year of operation following completion of the project.

**Table 2- Projected Universal-Brunswick Utilization by Payor –Project Year 2**

<b>Payor Category</b>	<b>Projected Resident Days by Payor</b>	<b>Projected Resident Days by Payor as % of Total Resident Days</b>
Private Pay	7,300	20.2%
Commercial	365	1.0%
Medicare	6,935	19.2%
Medicaid	19,710	54.6%
Hospice	1,825	5.1%
Total	36,135	100.0%

*Source: O-8780-12 application page 66; numbers may not foot because of rounding.*

As shown in the table above, the applicants project that 54.6 percent of their resident days of care will be Medicaid, which is 12.9 percentage points [67.5% - 54.6% = 12.9%] and 19.1 percent [12.9%/67.5% = 19.1%] below the FY 2011 Brunswick County average (67.5%) and 12.6 percentage points [67.2% - 54.6% = 12.6%] and 18.8 percent [12.6%/67.2% = 18.8%] below the FY 2010 statewide average (67.2%). Therefore, the applicants did not demonstrate that medically underserved groups will have adequate access to the proposed services and the application is non-conforming to this Review Criterion.

- 18a. The applicant shall demonstrate the expected effects of the proposed services on competition in the proposed service area, including how any enhanced competition will have a positive impact upon the cost effectiveness, quality, and access to the services proposed; and in the case of applications for services where competition between providers will not have a favorable impact on cost effectiveness, quality, and access to the services proposed, the applicant shall demonstrate that its application is for the service for which competition will not have a favorable impact.**

The application is non-conforming to this Review Criterion. The applicants did not adequately demonstrate that their proposal would have a positive impact on access to the proposed services. The applicants did not demonstrate that they currently provide adequate access to medically underserved groups, nor did they demonstrate that medically underserved groups will have adequate access to the proposed services. Please see discussions in Review Criterion (13a) and (13c).

- 20. An applicant already involved in the provision of health services shall provide evidence that quality care has been provided in the past.**

Dosher assumes that the CON Section will research all applicants' regulatory compliance to assure all applicants are conforming to this Review Criterion.



## **Attachment C**

FY 2010 DMA Cost Report Summary and 2012 Nursing Home Licensure Renewal Payor Mix Summary

**FY 2011 BRUNSWICK COUNTY NURSING FACILITY PAYOR MIX**

2012 Licensure Renewal Application

Page 6 - Question 2(a)

Nursing Care Days of Care	Ocean Trail Convalescent Center, Inc.	Autumn Care of Shallotte*	Brunswick Cove Nursing Center	Universal Health Care/Brunswick	J. Arthur Doshier Memorial Hospital	Autumn at Brunswick Plantation*	Total
NC Days Reimbursed by Medicare	3,213	4,906	7,024	7,121	495		22,759
NC Days Reimbursed by Medicaid	15,236	33,921	46,058	14,522	12,145		121,882
NC Days Reimbursed by Private Pay	5,644	3,737	3,675	5,233	5,297		23,586
NC Days Reimbursed by Other	1,540	354	3,314	1,302			6,510
<b>Total</b>	<b>25,633</b>	<b>42,918</b>	<b>60,071</b>	<b>28,178</b>	<b>17,937</b>	<b>-</b>	<b>174,737</b>

Payor Mix 2011	Ocean Trail Convalescent Center, Inc.	Autumn Care of Shallotte*	Brunswick Cove Nursing Center	Universal Health Care/Brunswick	J. Arthur Doshier Memorial Hospital	Autumn at Brunswick Plantation*	Total
NC Days Reimbursed by Medicare	12.53%	11.43%	11.69%	25.27%	2.76%	#DIV/0!	13.02%
NC Days Reimbursed by Medicaid	59.44%	79.04%	76.67%	51.54%	67.71%	#DIV/0!	69.75%
NC Days Reimbursed by Private Pay	22.02%	8.71%	6.12%	18.57%	29.53%	#DIV/0!	13.50%
NC Days Reimbursed by Other	6.01%	0.82%	5.52%	4.62%	0.00%	#DIV/0!	3.73%
<b>Total</b>	<b>100%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100%</b>	<b>100%</b>	<b>#DIV/0!</b>	<b>100.00%</b>

Payor Mix 2011	Total Days	Percent
NC Days Reimbursed by Medicare	22,759	13.0%
NC Days Reimbursed by Medicaid	121,882	69.8%
NC Days Reimbursed by Private Pay	23,586	13.5%
NC Days Reimbursed by Other	6,510	3.7%
<b>Total</b>	<b>174,737</b>	<b>100%</b>

Source: 2012 Nursing Home Licensure Renewals

\*Autumn at Brunswick Plantation is under development.

**FY 2010 North Carolina Nursing Care Facility Medicaid Days**

Facility	County	Total Patient Days	Medicaid Days
Abbotts Creek Care & Rehab Center	Davidson	21,398	15,040
Abernethy Laurels (UCHS)	Catawba	61,657	30,632
Adams Farm Living & Rehab	Guilford	38,143	24,863
Alamance Health Care Center	Alamance	61,764	41,646
Alexandria Place	Gaston	20,811	13,700
Alleghany Care & Rehabilitation Center	Alleghany	30,126	24,509
Alston Brook	Davidson	33,955	23,441
Asheville Health Care Center	Buncombe	36,269	25,198
Ashton Place Health and Rehab	Guilford	25,239	15,471
Aston Park Health Center, Inc.	Buncombe	42,668	30,731
Autumn Care of Biscoe	Montgomery	35,374	26,599
Autumn Care of Drexel	Burke	34,447	27,307
Autumn Care of Forest City	Rutherford	34,600	24,941
Autumn Care of Marion	Mcdowell	37,590	29,437
Autumn Care of Marshville	Union	37,249	24,019
Autumn Care of Mocksville	Davie	26,994	21,825
Autumn Care of Myrtle Grove	New Hanover	30,035	16,120
Autumn Care of Nash	Nash	20,751	11,346
Autumn Care of Raeford	Hoke	45,478	35,532
Autumn Care of Salisbury	Rowan	33,360	20,483
Autumn Care of Saluda	Polk	32,707	26,646
Autumn Care of Shallotte	Brunswick	43,338	33,124
Autumn Care of Statesville	Iredell	30,209	17,841
Autumn Care of Waynesville	Haywood	30,139	17,029
Avante at Charlotte	Mecklenburg	33,331	24,874
Avante at Concord	Cabarrus	40,868	29,804
Avante at Reidsville	Rockingham	38,724	27,549
Avante at Wilkesboro	Wilkes	40,957	28,184
Avante at Wilson	Wilson	36,485	25,278
Bayview Nursing & Rehab Center	Craven	19,265	8,782
Belaire Health Care Center	Gaston	26,781	13,767
Bermuda Commons	Davie	29,074	9,931
Bethesda Health Care Facility	Cumberland	28,022	20,032
Beverly Healthcare - Hendersonville	Henderson	49,612	39,782
Beystone Health and Rehab	Henderson	16,626	9,800
Big Elm Retirement and Nursing Center	Rowan	16,089	11,042
Blue Ridge Health Care Center	Wake	38,888	13,038
Blumenthal Jewish Nursing & Rehab Center	Guilford	46,148	18,836
Brian Center Health & Rehab/Brevard	Transylvani	43,591	34,410
Brian Center Health & Rehab/Charlotte	Mecklenburg	35,234	24,557
Brian Center Health & Rehab/Durham	Durham	44,154	18,053
Brian Center Health & Rehab/Eden	Rockingham	39,673	31,018
Brian Center Health & Rehab/Gastonia	Gaston	51,688	36,555
Brian Center Health & Rehab/Goldsboro	Wayne	45,045	30,425

**FY 2010 North Carolina Nursing Care Facility Medicaid Days**

Facility	County	Total Patient Days	Medicaid Days
Brian Center Health & Rehab/Hendersonvil	Henderson	40,623	27,235
Brian Center Health & Rehab/Hertford	Perquimans	23,959	18,020
Brian Center Health & Rehab/Hickory Eas	Catawba	52,796	34,719
Brian Center Health & Rehab/Salisbury	Rowan	35,023	27,729
Brian Center Health & Rehab/Spruce Pine	Mitchell	39,313	26,339
Brian Center Health & Rehab/Statesville	Iredell	47,626	35,328
Brian Center Health & Rehab/Wallace	Duplin	27,913	20,113
Brian Center Health & Rehab/Waynesville	Haywood	31,078	23,459
Brian Center Health & Rehab/Weaverville	Buncombe	41,984	26,535
Brian Center Health & Rehab/Wilson	Wilson	34,328	23,349
Brian Center Health & Rehab/Windsor	Bertie	26,951	20,376
Brian Center Health & Rehab/Winston-Sal	Forsyth	13,538	3,928
Brian Center Health & Rehab/Yanceyville	Caswell	51,757	43,688
Brian Center Health & Ret Hickory Viewmo	Catawba	35,724	22,859
Brian Center Health & Retire/Cabarrus	Cabarrus	29,624	15,171
Brian Center Health & Retire/Lincolnton	Lincoln	41,206	24,036
Brian Center Health & Retire/Mooresville	Iredell	39,655	28,862
Brian Center Health & Retirement/Clayton	Johnston	30,869	18,849
Brian Center Health & Retirement/Monroe	Union	20,814	14,111
Brian Center Nursing Care/Lexington	Davidson	31,956	23,821
Brian Center Nursing Care/Shamrock	Mecklenburg	32,180	26,031
Brightmoor Nursing Center	Rowan	18,814	17,155
Britthaven of Ayden	Pitt	27,778	19,085
Britthaven of Chapel Hill	Orange	41,766	32,421
Britthaven of Charlotte	Mecklenburg	71,075	60,434
Britthaven of Davidson	Davidson	48,342	39,009
Britthaven of Edenton	Chowan	35,040	28,100
Britthaven of Enfield	Halifax	19,588	17,112
Britthaven of Franklin	Macon	44,146	29,756
Britthaven of Goldsboro	Wayne	68,706	43,858
Britthaven of Graham	Graham	24,171	19,379
Britthaven of Guilford	Guilford	37,358	27,445
Britthaven of Hamlet	Richmond	35,859	27,598
Britthaven of Harnett	Harnett	36,082	23,754
Britthaven of Havelock	Craven	21,571	13,596
Britthaven of Henderson	Vance	32,670	24,087
Britthaven of Jacksonville	Onslow	56,732	41,343
Britthaven of Kernersville	Forsyth	32,034	22,703
Britthaven of Kinston	Lenoir	60,069	46,770
Britthaven of Louisburg	Franklin	48,076	41,330
Britthaven of Madison	Rockingham	58,455	46,750
Britthaven of Morganton	Burke	34,138	25,178
Britthaven of New Bern	Craven	30,834	24,011
Britthaven of Newport	Carteret	20,929	14,281

**FY 2010 North Carolina Nursing Care Facility Medicaid Days**

Facility	County	Total Patient Days	Medicaid Days
Britthaven of Northchase	New Hanover	42,244	25,609
Britthaven of Onslow	Onslow	34,284	23,926
Britthaven of Outer Banks	Dare	28,458	22,494
Britthaven of Pamlico	Pamlico	23,687	19,630
Britthaven of Piedmont	Stanly	62,020	52,264
Britthaven of Smithfield	Johnston	65,357	50,066
Britthaven of Snow Hill	Greene	37,479	28,221
Britthaven of Washington	Beaufort	47,701	37,420
Britthaven of Wilkesboro	Wilkes	61,489	50,536
Britthaven of Wilson	Wilson	30,900	21,892
Britthaven of Wrightsville	New Hanover	22,265	18,925
Brookridge Retirement Community	Forsyth	22,709	5,504
Brookshire Nursing Center	Orange	26,695	12,790
Brookside Rehabilitation & Care	Yancey	36,052	23,396
Brookstone Living Center	Jones	22,868	17,639
Brunswick Cove Living Center	Brunswick	56,296	43,109
Camden Place Health & Rehab, LLC	Guilford	42,229	24,078
Camelot Manor Nursing Facility Inc	Caldwell	38,301	31,078
Campbellton Healthcare Center	Cumberland	40,148	28,500
Canton Christian Convalescent Center	Haywood	23,029	19,285
Capital Nursing and Rehab Center	Wake	38,441	28,401
Cardinal Healthcare & Rehabilitation Ctr	Lincoln	21,516	11,629
Carolina Care Center of Cherryville, Inc	Gaston	37,177	26,424
Carolina Commons	Guilford	71,804	59,172
Carolina Health Care Center of Burke	Burke	28,349	9,372
Carolina Health Care Cntr of Cumberland	Cumberland	46,956	27,454
Carrington Place	Mecklenburg	51,503	34,737
Carver Living Center	Durham	69,080	54,331
Cary Health and Rehabilitation Center	Wake	41,388	27,572
Centerclair (UCHS)	Davidson	19,750	16,872
Central Continuing Care	Surry	42,591	29,503
Century Care of Laurinburg, Inc.	Scotland	22,859	16,760
Chapel Hill Rehab & Healthcare Center	Orange	37,302	24,781
Charlotte Health Care Center	Mecklenburg	37,976	23,079
City of Oaks Health & Rehab Center	Wake	46,307	34,257
Clapp's Convalescent Nursing Home, Inc.	Randolph	33,388	17,186
Clapps Nursing Center	Guilford	41,477	28,287
Clay County Care Center	Clay	22,632	16,548
Clemmons Nursing & Rehab Center	Forsyth	13,548	8,514
College Pines Nursing Center	Burke	33,256	19,405
Conover Nursing & Rehab Center	Catawba	31,043	20,018
Countryside Manor Inc.	Guilford	20,176	12,080
Courtland Terrace	Gaston	26,882	11,935
Courtyard Rehab & Nursing Center, LLC	Buncombe	36,856	28,954

**FY 2010 North Carolina Nursing Care Facility Medicaid Days**

Facility	County	Total Patient Days	Medicaid Days
Croasdaile Village	Durham	36,004	9,202
Cross Creek Health Care	Hyde	18,169	14,209
Crystal Bluffs Rehab & Health	Carteret	31,011	17,375
Cypress Pointe Rehab & Healthcare Center	New Hanover	33,007	18,120
Davis Health Care Center	New Hanover	69,474	30,517
Down East Health and Rehabilitation Cntr	Gates	19,674	16,935
Dunn Rehab & Nursing Center	Harnett	33,898	25,650
Edgewood Place at the Village -Brookwood	Alamance	33,898	11,351
Elderberry Health Care	Madison	28,947	25,182
Elizabethtown Nursing Center, Inc.	Bladen	32,421	28,023
Emerald Ridge Rehabilitation & Care Cntr	Buncombe	34,743	21,601
Fair Haven Home	Rutherford	10,499	5,865
Five Oaks Manor	Cabarrus	55,537	44,059
Flesher's Fairview Healthcare Center	Buncombe	37,403	29,578
Forrest Oakes Healthcare Center	Stanly	19,925	13,839
Friends Homes - Guilford	Guilford	25,007	7,432
Gateway Rehabilitation and Healthcare	Caldwell	33,869	21,125
GGNSC Asheville LLC	Buncombe	26,484	18,827
GGNSC Charlotte American LLC	Mecklenburg	39,143	26,911
GGNSC Charlotte Renaissance LLC	Mecklenburg	42,009	31,338
GGNSC Greensboro II LLC	Guilford	34,462	21,734
GGNSC Greensboro Starmount LLC	Guilford	43,464	27,823
GGNSC Greenville LLC	Pitt	53,312	33,813
GGNSC Lumberton LLC	Robeson	42,111	31,563
GGNSC Mount Airy LLC	Surry	23,299	10,112
GGNSC Tarboro LLC	Edgecombe	56,027	43,513
Givens Health Center	Buncombe	20,738	6,304
Glenaire, Inc.	Wake	23,529	3,163
Glenbridge Health and Rehabilitation	Watauga	42,914	26,930
Glencare	Duplin	17,851	15,380
Glenflora	Robeson	17,349	13,124
Golden Years Nursing Home	Cumberland	19,765	15,919
Grace Healthcare of Asheville	Buncombe	34,072	26,490
Grace Healthcare of Durham	Durham	39,947	34,528
Grace Healthcare of Winston-Salem	Forsyth	66,076	49,047
Grace Heights	Burke	39,007	26,089
Greenfield Place, LLC	Pitt	40,667	31,053
Guardian Care of Ahoskie	Hertford	53,185	40,999
Guardian Care of Elizabeth City	Pasquotank	40,871	30,030
Guardian Care of Henderson	Vance	27,842	21,493
Guardian Care of Roanoke Rapids	Halifax	38,026	23,409
Guardian Care of Rocky Mount	Nash	40,906	27,695
Guardian Care of Scotland Neck	Halifax	20,212	15,643
Guardian Care of Zebulon	Wake	20,716	12,371

**FY 2010 North Carolina Nursing Care Facility Medicaid Days**

Facility	County	Total Patient Days	Medicaid Days
Guilford Health Care Center	Guilford	37,127	19,932
Hampton Woods Health & Rehab Center	Northampton	24,630	19,636
Harborview Health Care Center	Carteret	11,870	7,684
Harborview Health Care Facility	Carteret	9,550	7,022
Haymount Rehab & Nursing Center	Cumberland	31,552	21,541
Heartland Living & Rehab, Inc.	Guilford	37,174	26,813
Hendersonville Health and Rehab	Henderson	44,627	21,984
Heritage Healthcare of Elkin	Surry	34,933	23,183
Heritage Healthcare of Farmville	Pitt	18,809	13,005
Heritage Healthcare of High Point, LLC	Forsyth	26,769	22,028
Heritage Hills Living Center, LLC	Anson	23,362	15,333
Highland Farms, Inc.	Buncombe	20,311	4,254
Highland House of Fayetteville, Inc.	Cumberland	35,669	25,313
Hillcrest Convalescent Center, Inc.	Durham	26,878	2,978
Hillside Nursing Ctr - Wake Forest	Wake	44,329	32,407
Hunter Woods Nursing & Rehabilitation	Mecklenburg	37,049	27,556
Huntersville Oaks	Mecklenburg	58,355	32,845
Huntington Health Care Inc.	Pender	32,987	24,972
Kenansville Health & Rehab	Duplin	27,892	21,703
Kingswood Nursing Center, Inc.	Moore	32,179	22,541
Kinston Rehabilitation & Healthcare Ctr	Lenoir	35,651	26,924
Lake Park Nursing & Rehab Center	Union	41,363	18,708
LC Nursing & Rehab of Johnston County	Johnston	33,800	22,753
LC Nursing Center of Columbus County	Columbus	35,196	22,401
LC Nursing Center of Halifax County	Halifax	15,431	10,046
Lee County Nursing and Rehab Ctr. LLC	Lee	16,337	12,513
Lenior Healthcare Center	Caldwell	41,525	32,631
Lexington Health Care Center	Davidson	30,986	19,576
Liberty Commons Nursing Center of Lee	Lee	26,694	17,628
Liberty Commons Nursing Center, Inc.	New Hanover	27,945	13,611
Liberty Commons Nursing of Alamance Co.	Alamance	29,721	15,981
Liberty Commons Nursing of MecklenburgCo	Mecklenburg	62,244	49,224
Liberty Commons Nursing of Rowan County	Rowan	28,740	18,653
Libertywood Nursing Center, Inc.	Davidson	32,364	27,582
Life Care Center of Banner Elk	Avery	35,144	21,956
Life Care Center of Hendersonville	Henderson	27,992	8,209
Lincoln Nursing Center	Lincoln	40,028	26,092
Linkhaw Place	Robeson	28,953	20,758
Litchford Falls Healthcare & Rehab	Wake	31,502	22,164
Louisburg Nursing Center, Inc.	Franklin	29,473	20,476
Lutheran Home - Albemarle, Inc.	Stanly	25,503	14,119
Lutheran Home - Hickory West, Inc.	Catawba	41,772	28,285
Lutheran Home - Hickory, Inc.	Catawba	34,638	17,929
Lutheran Home - Winston-Salem, Inc.	Forsyth	38,000	32,729

**FY 2010 North Carolina Nursing Care Facility Medicaid Days**

Facility	County	Total Patient Days	Medicaid Days
Lutheran Home at Trinity Oaks, Inc.	Rowan	40,008	23,110
Madison Manor Nursing Center	Madison	33,257	24,402
Magnolia Estates Skilled Care Facility	Rowan	22,617	16,731
Magnolia Living Center, LLC	Harnett	31,654	26,124
Manor Care of Pinehurst, NC	Moore	39,616	24,692
Maple Leaf Healthcare	Iredell	32,988	22,870
Mary Gran Nursing Center	Sampson	64,275	49,745
Maryfield Nursing Home	Guilford	41,943	16,354
Masonic and Eastern Star Home	Guilford	31,152	10,851
Mayview Convalescent Center	Wake	4,022	1,819
Meadowwood Nursing Center Inc.	Gaston	17,347	12,163
Mecklenburg Health Care Center	Mecklenburg	32,293	15,971
Mooreville Center	Iredell	44,448	26,178
Mount Olive Care & Rehabilitation Center	Wayne	49,958	38,907
Mountain Home Health & Rehab	Henderson	38,429	32,260
Mountain Ridge Wellness Center	Buncombe	17,417	12,454
Mountain Trace Nursing Center	Jackson	36,042	23,907
Mountain View Manor	Swain	31,684	21,595
Mountain Vista Health Park	Davidson	21,550	17,310
Nash Grove Manor	Nash	16,510	10,284
Nash Rehab & Nursing Center	Nash	49,560	38,589
Oak Forest Health and Rehab	Forsyth	52,626	34,053
Oak Grove Healthcare Center	Rutherford	20,674	11,642
Ocean Trail Convalescent Center, Inc.	Brunswick	24,501	13,431
Olde Knox Commons at the Villages of Mec	Mecklenburg	36,015	21,107
Peak Resources-Charlotte	Mecklenburg	39,528	36,022
Peak Resources-Cherryville	Gaston	17,504	15,090
Peak Resources-Gastonia	Gaston	40,974	33,061
Peak Resources-Pinelake	Moore	31,659	21,783
Peak Resources-Shelby	Cleveland	34,841	27,784
Peak Resources-Treyburn	Durham	41,117	27,192
Pembroke Care & Rehabilitation Center	Robeson	26,986	21,449
Penick Village	Moore	16,489	6,231
Penn Nursing Center	Rockingham	28,267	18,887
Pettigrew Rehab & Healthcare Center	Durham	31,893	19,636
Piedmont Crossing (UCHS)	Davidson	18,862	5,425
Pinehurst Nursing Center, Inc.	Moore	28,480	18,740
Pineville Rehab & Living Center	Mecklenburg	36,846	24,807
Pisgah Manor Health Care Center	Buncombe	40,408	22,366
Plumlee Nursing Center	Washington	38,831	31,226
Poplar Heights Care & Rehab	Bladen	30,330	23,608
Premier Living & Rehabilitation Center	Columbus	37,472	28,573
Presbyterian Home of Hawfields, Inc.	Alamance	36,186	22,597
Quail Haven Village	Moore	16,443	5,405



**FY 2010 North Carolina Nursing Care Facility Medicaid Days**

Facility	County	Total Patient Days	Medicaid Days
Raleigh Rehab & Healthcare Center	Wake	55,560	36,655
Randolph Health & Rehab Center	Randolph	69,343	53,307
Regency Care of Black Mountain LLC	Buncombe	17,443	12,635
Regency Care of Clemmons, LLC	Forsyth	13,689	8,366
Rehab & Healthcare Center of Alamance	Alamance	39,956	28,998
Rehab and Health Care Center Village Grn	Cumberland	35,340	15,868
Rehabilitation & Health Ctr Gastonia	Gaston	39,851	26,978
Rehabilitation & Nursing Ctr of Monroe	Union	49,414	37,885
Rex Rehab & Nursing Care Center of Apex	Wake	33,071	11,969
Rich Square Health Care Center	Northampton	23,515	19,073
Rickman Nursing Care Center	Buncombe	27,370	10,971
Ridgewood Manor	Beaufort	34,921	26,768
River Landing at Sandy Ridge	Guilford	22,150	6,788
Rockingham Manor	Richmond	37,690	27,543
Rose Manor Healthcare Center	Durham	38,937	24,084
Roxboro Nursing Center, Inc.	Person	44,710	31,236
Salemtowne	Forsyth	30,122	3,586
Salisbury Center LLC	Rowan	55,021	35,365
Sanford Health and Rehabilitation	Lee	25,962	17,602
Sardis Oaks	Mecklenburg	38,307	14,469
Saturn Nursing and Rehab	Mecklenburg	39,560	30,821
Scotia Village	Scotland	19,655	3,984
Senior Citizen's Home, Inc.	Vance	20,375	15,069
Sentara Nursing Center-Currituck	Currituck	31,351	21,581
Shaire Nursing Center	Caldwell	18,939	7,820
Shannon Gray Rehabilitation & Recovery	Guilford	6,617	5,178
Shoreland Health Care & Retirement Ctr	Columbus	31,109	22,427
Silas Creek Manor	Forsyth	30,703	21,650
Siler City Care & Rehab Center	Chatham	50,329	39,265
Silver Bluff, LLC	Haywood	40,147	28,336
Silver Stream Health & Rehab Center	New Hanover	35,926	14,489
Skyland Care Center	Jackson	28,604	23,147
Smithfield Manor	Johnston	54,500	41,119
Smoky Mountain Healthcare & Rehab Center	Haywood	14,656	3,986
Snug Harbor on Nelson Bay	Carteret	13,872	577
South Village	Nash	27,720	23,523
Southwood Nursing & Retirement	Sampson	35,554	25,754
Springwood Care Center of Forsyth	Forsyth	61,989	37,843
St Joseph of the Pines	Moore	55,000	16,302
Stanley Total Living Center	Gaston	37,295	25,585
Stanly Manor, Inc.	Stanly	31,368	21,349
Sunnybrook Healthcare & Rehab Specialist	Wake	33,018	15,963
Sunrise Rehabilitation & Care	Mcdowell	39,089	29,984
Tarboro Nursing Center	Edgecombe	41,593	35,786

**FY 2010 North Carolina Nursing Care Facility Medicaid Days**

Facility	County	Total Patient Days	Medicaid Days
Taylor Extended Care	Carteret	23,760	19,623
The Evergreens, Inc. - Greensboro	Guilford	3,939	2,976
The Evergreens, Inc. - High Point	Guilford	16,910	12,715
The Fountains at the Albemarle	Edgecombe	9,602	3,330
The Graybrier Nursing & Retirement Ctr	Randolph	43,939	31,790
The Laurels of Chatham	Chatham	48,017	33,679
The Laurels of Forest Glenn	Wake	42,213	29,092
The Laurels of GreenTree Ridge	Buncombe	34,097	16,339
The Laurels of Hendersonville	Henderson	34,368	19,786
The Laurels of Salisbury	Rowan	19,359	12,832
The Laurels of Summit Ridge	Buncombe	19,263	7,618
The Margate Health & Rehab Center	Ashe	41,720	31,879
The Oaks at Forsyth	Forsyth	53,411	30,645
The Oaks at Mayview	Wake	12,534	4,612
The Oaks at Sweeten Creek	Buncombe	33,934	18,899
The Oaks at Town Center, LLC	Cabarrus	23,471	8,659
The Oaks of Brevard	Transylvani	37,208	20,447
The Oaks of Carolina, LLC	Wake	51,994	19,801
Three Rivers Health and Rehab Center	Bertie	19,681	14,485
THS of Kannapolis	Cabarrus	35,412	18,562
Triad Care & Rehab Center	Guilford	58,787	45,592
Tsali Care Center	Cherokee	20,321	14,742
Twin Lakes Community	Alamance	31,247	16,354
Twin Lakes Community - Memory Care	Alamance	5,647	1,557
Two Rivers Healthcare - Neuse Campus,LLC	Craven	37,825	25,696
Two Rivers Healthcare - Trent Campus	Craven	37,386	22,546
Unihealth Post-Acute Care of Durham	Durham	12,103	8,082
Universal Healthcare and Rehabilitation	Cabarrus	36,932	26,932
Universal Healthcare/Brunswick	Brunswick	12,020	4,620
Universal Healthcare/Fletcher	Henderson	31,594	18,007
Universal Healthcare/Greenville Inc.	Pitt	38,130	31,607
Universal Healthcare/King	Stokes	31,017	21,330
Universal Healthcare/Lillington Inc	Harnett	43,152	35,100
Universal Healthcare/Nashville	Nash	3,118	1,989
Universal Healthcare/North Raleigh	Wake	38,105	21,856
Universal Healthcare/Oxford, Inc.	Granville	47,012	40,529
Universal Healthcare/Ramseur	Randolph	32,023	20,831
Valley Nursing Center	Alexander	31,609	19,930
Valley View Care and Rehabilitation Cntr	Cherokee	23,120	15,746
Village Care of King	Stokes	32,796	25,319
W.R. Winslow Memorial Home	Pasquotank	50,680	32,720
Walnut Cove Health & Rehabilitation Cntr	Stokes	30,548	22,030
Warren Hills Nursing Center	Warren	45,132	37,675
Wellington Rehabilitation and Healthcare	Wake	27,687	18,580

**FY 2010 North Carolina Nursing Care Facility Medicaid Days**

Facility	County	Total Patient Days	Medicaid Days
Wesley Pines	Robeson	20,780	11,526
Westchester Manor at Providence Place	Guilford	45,379	23,716
Westwood Health & Rehabilitation Center	Randolph	23,182	15,345
Whispering Pines Nursing Home	Cumberland	27,640	18,537
White Oak Manor Burlington Inc	Alamance	53,628	41,942
White Oak Manor Charlotte Inc	Mecklenburg	63,413	50,913
White Oak Manor Kings Mountain Inc	Cleveland	51,801	40,718
White Oak Manor Rutherfordton Inc	Rutherford	26,873	18,363
White Oak Manor Shelby Inc	Cleveland	55,316	43,045
White Oak Manor Tryon Inc	Polk	23,318	12,538
White Oak Manor Waxhaw Inc	Union	7,245	2,518
Wilkes Senior Village	Wilkes	36,998	25,052
Williamston Rehab & Healthcare Center	Martin	44,738	38,455
Willow Ridge of North Carolina, LLC	Rutherford	49,535	35,708
Willowbrook Rehabilitation & Care Center	Yadkin	26,215	18,033
WilMed Nursing Care Center	Wilson	30,237	22,451
Wilmington Health & Rehabilitation Cntr	New Hanover	38,079	25,442
Wilora Lake Healthcare Center	Mecklenburg	23,499	11,971
Woodbury Wellness Center	Pender	38,128	25,523
Woodland Hill Care & Rehab Center	Randolph	34,061	22,409
Woodlands Nursing and Rehab Center	Cumberland	26,472	17,688
Yadkin Nursing Care Center, Inc.	Yadkin	48,844	33,900
<b>TOTAL FOR ALL FACILITIES:</b>		<b>12,871,945</b>	<b>8,646,632</b>

**Percent Medicaid**

**67.2%**

Source:

Hubert DeHaven

DMA Audit Section

## **Attachment D**

Medicare Nursing Home Compare Scores as of March 26, 2012

### Step 3: Compare Nursing Homes

[Return To Previous Page](#)

The 2 nursing homes you selected to compare are displayed in the table below. **To view more detailed information about a specific nursing home, click on the name of the nursing home.**

[Show All](#) | [Hide All](#)

#### Your Selected Nursing Homes

	<b>J ARTHUR DOSHER MEM HOSP</b> 924 N HOWE STREET SOUTHPORT, NC 28461 (910) 457-3800  <b>Mapping &amp; Directions</b>	<b>UNIVERSAL HEALTH CARE / BRUNSWICK</b> 1070 OLD OCEAN HIGHWAY BOLIVIA, NC 28422 (910) 755-5955  <b>Mapping &amp; Directions</b>
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<b>Overall Rating</b>	★★★★★ 5 out of 5 stars	★★★★ 3 out of 5 stars
<b>Health Inspections</b>	★★★★★ 5 out of 5 stars	★★★ 2 out of 5 stars
Total Number of Health Deficiencies	0	5
Date of Last Standard Health Inspection	10/12/2011	06/30/2011
Quality Indicator Survey	No	No
Dates of Complaint Investigations	11/01/2010-01/31/2012	11/01/2010-01/31/2012
Range of Health Deficiencies in North Carolina	0-29	0-29
	<a href="#">View Health Inspections Details</a>	<a href="#">View Health Inspections Details</a>

<b>Nursing Home Staffing</b>	★★★★★ 5 out of 5 stars	★★★★ 4 out of 5 stars
RN Staff Only <sup>1</sup>	★★★★★ 5 out of 5 stars	★★★★ 4 out of 5 stars
Total Number of Residents	47	74
Total Number of Licensed Nurse Staff Hours per Resident per Day	1 hour 49 minutes	1 hour 49 minutes
RN Hours per Resident per Day	55 minutes	53 minutes
LPN/LVN Hours per Resident per Day	55 minutes	56 minutes
CNA Hours per Resident per Day	3 hours 2 minutes	2 hours 41 minutes

#### How to Read Staffing Chart | [About Staff Roles](#)

<b>Quality Measures</b>	★★★★★ 5 out of 5 stars	★★★★ 4 out of 5 stars
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Select All

[View Graphs](#)

#### Long-Stay Residents

**Note:** For the following measures, **higher percentages are better.** Read why Quality Measures are important to you

<input type="checkbox"/> Percent of long-stay residents given influenza vaccination during the flu season	100%	Not Available
<input type="checkbox"/> Percent of long-stay residents who were assessed and given pneumococcal vaccination	99%	67%

**Note:** For the following measures, **lower percentages are better.** Read why Quality Measures are important to you

<input type="checkbox"/> Percent of long-stay residents whose need for help with daily activities has increased	18%	Not Available
<input type="checkbox"/> Percent of long-stay residents who have moderate to severe pain	1%	1%
<input type="checkbox"/> Percent of high-risk long-stay residents who have pressure sores	7%	Not Available
<input type="checkbox"/> Percent of low-risk long-stay residents who have pressure sores	0%	Not Available
<input type="checkbox"/> Percent of long-stay residents who were physically restrained	0%	0%
<input type="checkbox"/> Percent of long-stay residents who are more depressed or anxious	9%	16%
<input type="checkbox"/> Percent of low-risk long-stay residents who lose control of their bowels or bladder	30%	Not Available
<input type="checkbox"/> Percent of long-stay residents who have/had a catheter inserted and left in their bladder	3%	3%
<input type="checkbox"/> Percent of long-stay residents who spend most of their time in bed or in a chair	12%	6%
<input type="checkbox"/> Percent of long-stay residents whose ability to move about in and around their room got worse	9%	Not Available
<input type="checkbox"/> Percent of long-stay residents who had a urinary tract infection	6%	16%
<input type="checkbox"/> Percent of long-stay residents who lose too much weight	8%	16%

[Select All](#)    [View Graphs](#)

**Short-Stay Residents**

**Note:** For the following measures, **higher percentages are better.** Read why **Quality Measures are important to you**

<input type="checkbox"/> Percent of short-stay residents given influenza vaccination during the flu season	100%	70%
<input type="checkbox"/> Percent of short-stay residents who were assessed and given pneumococcal vaccination	100%	73%

**Note:** For the following measures, **lower percentages are better.** Read why **Quality Measures are important to you**

<input type="checkbox"/> Percent of short-stay residents who have delirium	Not Available	0%
<input type="checkbox"/> Percent of short-stay residents who had moderate to severe pain	Not Available	23%
<input type="checkbox"/> Percent of short-stay residents who have pressure sores	Not Available	10%

**Fire Safety Inspections**

**2** Fire Safety Deficiencies

**3** Fire Safety Deficiencies

Automatic Sprinkler Systems in All Required Areas	Fully Sprinklered	Fully Sprinklered
Date of Last Standard Fire Inspection	10/12/2011	06/30/2011
Dates of Complaint Investigations	11/01/2010-01/31/2012	11/01/2010-01/31/2012
Range of Fire Safety Deficiencies in North Carolina	0-12	0-12

[View Fire Safety Inspection Details](#)

[View Fire Safety Inspection Details](#)

**Penalties and Denials of Payment Against the Nursing Home**

**0** Civil Money Penalties  
**0** Payment Denials

**2** Civil Money Penalties  
**0** Payment Denials

[View Enforcement Action Details](#)

[View Enforcement Action Details](#)

**Complaints and Incidents**

What is this?

**0** Complaints  
**0** Incidents

**6** Complaints  
**0** Incidents

[View Complaint Details](#)

[View Complaint Details](#)

**Nursing Home Characteristics**

Program Participation

Medicare and Medicaid

Medicare and Medicaid

Number of Certified Beds

**50** Certified Beds

**90** Certified Beds

Type of Ownership

Government - Hospital district

For profit - Corporation

Continuing Care Retirement Community

No

No

Resident & Family Councils

Resident Council Only

Resident Council Only

Located in a Hospital

Yes

No