



NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**

JOSH STEIN • Governor

DEV DUTTA SANGVAI • Secretary

MARK PAYNE • Director, Division of Health Service Regulation

VIA EMAIL ONLY

April 30, 2025

Timothy Walsh, Director of Business Development
twalsh@libertyseniorliving.com

No Review

Record #: 4766
Date of Request: January 21, 2025
Facility Name: Woodlands Nursing and Rehabilitation Center
FID #: 923402
Business Name: Liberty Healthcare Group, LLC
Business #: 3709
Project Description: Temporary cessation in operation of adult care home beds
County: Cumberland

Dear Mr. Walsh:

The Healthcare Planning and Certificate of Need Section, Division of Health Service Regulation (Agency) received your correspondence regarding the project described above. Based on the representation in your request and the CON law **in effect on the date of this response to your request**, the project as described is not governed by, and therefore, does not currently require a certificate of need. If the CON law is subsequently amended such that the above referenced proposal would require a certificate of need, this determination does not authorize you to proceed to develop the above referenced proposal when the new law becomes effective.

This determination is binding only for the facts represented in your correspondence. If changes are made in the project or in the facts provided in the correspondence referenced above, a new determination as to whether a certificate of need is required would need to be made by this office. **As a reminder, it is unlawful to offer or develop a new institutional health service without first obtaining a certificate of need. The Department reserves the right to impose sanctions, including civil penalties and the revocation of a license, upon any entity that offers or develops a new institutional health service without first obtaining a certificate of need.**

Please do not hesitate to contact this office if you have any questions.

Sincerely,

Mike McKillip for Tanya Saporito, Project Analyst

Micheala Mitchell, Chief

cc: Nursing Home Licensure and Certification Section, DHSR

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • DIVISION OF HEALTH SERVICE REGULATION
HEALTHCARE PLANNING AND CERTIFICATE OF NEED SECTION

LOCATION: 809 Ruggles Drive, Edgerton Building, Raleigh, NC 27603
MAILING ADDRESS: 809 Ruggles Drive, 2704 Mail Service Center, Raleigh, NC 27699-2704
<https://info.ncdhhs.gov/dhsr/> • TEL: 919-855-3873

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER



January 21, 2025

VIA EMAIL ONLY

Chalice Moore, Project Analyst
Mike McKillip, Team Leader
NC Department of Health and Human Services
Division of Health Service Regulation
Healthcare Planning and Certificate of Need Section
2704 Mail Service Center Raleigh, NC 27699-2704

RE: REQUEST OF NO REVIEW - Temporary Relocation of 58 SNF Beds from Golden Years Nursing Home (NH0076)

Dear Ms. Moore and Mr. McKillip,

I am writing to formally request a no review determination regarding the proposed temporary relocation of 58 skilled nursing facility (SNF) beds currently licensed to Golden Years Nursing Home in Falcon, NC (Cumberland County), License Number NH0076 (“Golden Years”).

In 2023, Liberty was approved to transfer these 58 SNF beds, along with others, to Wake County for the development of a new 125-bed nursing facility under Project ID J-12354-23. Subsequently, Liberty submitted a change of scope application under Project ID J-12563-24 to relocate an additional 11 beds to the new Wake County facility, which is expected to be completed by October 2028.

Given the deteriorating condition of Golden Years, we propose transitioning the 58 SNF beds and residents to two facilities within Cumberland County as follows:

- 20 SNF beds to Woodlands Nursing and Rehabilitation Center (License Number NH0577) (“Woodlands”)
- 38 SNF beds to Highland House Rehabilitation and Healthcare (License Number NH0117) (“Highland House”)

Both Woodlands and Highland House have adequate space within their assisted living wings to accommodate these beds. To facilitate this transition, we plan to temporarily cease operating the assisted living beds in these facilities. This measure is intended solely as a temporary solution to ensure continued care for residents within Cumberland County until the Wake County facility (Project ID J-12563-24) is operational.

Our plan includes the following actions:



1. Submission of an application to increase the bed capacity at Woodlands by 20 NF beds.
2. Submission of an application to increase the bed capacity at Highland House by 38 NF beds.
3. Upon approval of these applications and prior to the opening of the Wake County facility, submission of a change of scope (COS) application for Project ID J-12563-24 to relocate the 58 beds from Woodlands and Highland House instead of Golden Years.
4. Temporary cessation of assisted living beds at both receiving facilities to accommodate this transition, with plans to bring them back online once the SNF beds are moved to Wake County.

This no review request is to temporarily cease operating the assisted living beds in these facilities as well as confirm that even if Wake County shows a surplus of NF beds in the year we apply for the change of scope (COS), we would still be able to submit the application to relocate the 58 beds from Woodlands and Highland House instead of Golden Years.

We believe this transition will not negatively impact resident care or future demand; rather, it will enhance the quality of care for residents currently at Golden Years by placing them in modernized facilities that better meet their needs.

Thank you for your attention to this matter. We appreciate your understanding and cooperation as we continue to provide essential healthcare services to our communities.

Best Regards,

Timothy Walsh
Director of Business Development
Liberty Senior Living
TWalsh@libertyseniorliving.com
(910) 332-1982

From: [Mckillip, Mike](#)
To: [Stancil, Tiffany C](#)
Cc: [Moore, Chalice L](#)
Subject: FW: [External] No Review Request Letter – 58 SNF Beds at Golden Years
Date: Tuesday, January 21, 2025 3:16:58 PM
Attachments: [LTC - Golden Years Letter of No Review \(58 NF beds FINAL\).pdf](#)
[RE External Transition Plan for Relocation of Golden Years SNF Beds.msg](#)

Hi Tiffany,

Even though he address this no review request to Chalice, it is a Cumberland County facility so should be assigned to Tanya. Thanks.

Michael Mckillip

Team Leader, Certificate of Need

Division of Health Service Regulation, Healthcare Planning and Certificate of Need

[NC Department of Health and Human Services](#)

Office: 919-855-3877 (I am in the office on Wednesday and Friday, and can best be reached by email on Monday, Tuesday and Thursday.)

mike.mckillip@dhhs.nc.gov

809 Ruggles Drive, Edgerton
2704 Mail Service Center
Raleigh, NC 27699

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From: Timothy J. Walsh <TWalsh@libertyseniorliving.com>

Sent: Tuesday, January 21, 2025 3:06 PM

To: Moore, Chalice L <chalice.moore@dhhs.nc.gov>; Mckillip, Mike <mike.mckillip@dhhs.nc.gov>

Subject: [External] No Review Request Letter – 58 SNF Beds at Golden Years

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Good afternoon Chalice, Mike,

Attached is a No Review request letter for the 58 SNF beds currently at Golden Years. As discussed, we wanted to formalize our request in writing based on our previous conversations and assumptions, which are also included for your review.

Please let me know if you have any questions or need any additional information.

Regards,

Timothy J. Walsh

Director of Business Development

Liberty Senior Living

Office: 910-332-1982

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TWalsh@libertyseniorliving.com

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From: [Mckillip, Mike](#)
To: [Timothy J. Walsh](#)
Subject: RE: [External] Transition Plan for Relocation of Golden Years SNF Beds
Date: Tuesday, November 19, 2024 11:47:47 AM

Yes, those 58 NF beds are already approved and counted in the inventory for Wake County (as shown in the table on page 167 of the Proposed 2025 SMFP) so the COS project would not be adding anything to the Wake County NF inventory.

Michael McKillip

Team Leader, Certificate of Need
Division of Health Service Regulation, Healthcare Planning and Certificate of Need
[NC Department of Health and Human Services](#)

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From: Timothy J. Walsh <TWalsh@libertyseniorliving.com>
Sent: Tuesday, November 19, 2024 10:12 AM
To: Mckillip, Mike <mike.mckillip@dhhs.nc.gov>
Subject: RE: [External] Transition Plan for Relocation of Golden Years SNF Beds

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Good morning Mike,

Thank you for the feedback provided below. I wanted to clarify one point regarding the highlighted section:

If Wake County shows a surplus of NF beds in the year we apply for the change of scope (COS), would we still be able to submit the application to relocate the 58 beds from Woodlands and Highland House instead of Golden Years?

Regards,

Timothy J. Walsh

Director of Business Development

Liberty Senior Living

TWalsh@libertyseniorliving.com

From: Mckillip, Mike <mike.mckillip@dhhs.nc.gov>

Sent: Friday, November 8, 2024 2:13 PM

To: Timothy J. Walsh <TWalsh@libertyseniorliving.com>

Cc: Jeff Wilson <jwilson@libertyhcare.com>; Roxanne L. Thompson <RoxThompson@liberty-ltc.com>; Dain H. Simpson <DSimpson@liberty-ltc.com>

Subject: RE: [External] Transition Plan for Relocation of Golden Years SNF Beds

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Hi Tim,

Just heard back from Micheala Mitchell, and after consulting with the AG's office, the Agency has determined that you would need to submit three CON applications to accomplish what is proposed: One application to increase the bed capacity at Woodland by 20 NF beds, a second application to increase the bed capacity at Highland House by 38 NF beds and then, following approval of those two applications and prior to opening of the Wake County facility, **a change of scope (COS) application for Project ID # J-12354-23 to relocate the 58 beds from Woodlands and Highland House rather than Golden Years**. So that's a lot, but it can be done. Let me know if you have any questions.

Mike

Michael McKillip

Team Leader, Certificate of Need

Division of Health Service Regulation, Healthcare Planning and Certificate of Need

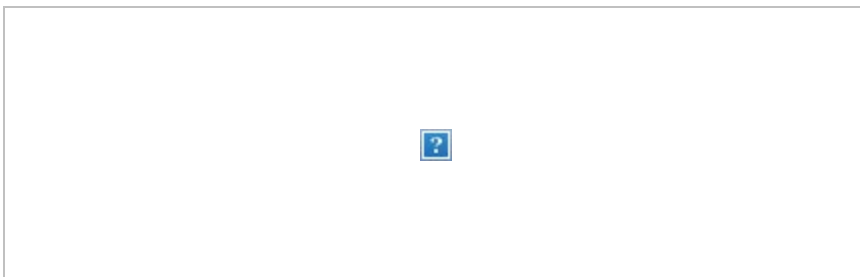
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Office: 919-855-3877 (I am in the office on Wednesday and Friday, and can best be reached by email on Monday, Tuesday and Thursday.)

mike.mckillip@dhhs.nc.gov

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From: Timothy J. Walsh <TWalsh@libertyseniorliving.com>

Sent: Wednesday, October 23, 2024 3:12 PM

To: Mckillip, Mike <mike.mckillip@dhhs.nc.gov>

Cc: Jeff Wilson <jwilson@libertyhcare.com>; Roxanne L. Thompson <RoxThompson@liberty-ltc.com>; Dain H. Simpson <DSimpson@liberty-ltc.com>

Subject: [External] Transition Plan for Relocation of Golden Years SNF Beds

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Hi Mike,

I hope you are doing well!

Our Golden Years nursing community in Falcon, NC (Cumberland County), has reached the end of its service. The license number for the facility is NH0076, and it is currently licensed for 58 SNF beds.

In 2023, Liberty was approved to transfer these 58 SNF beds (along with others) to Wake County for the development of a new 125-bed NF building (Project J-12354-23). Recently, Liberty submitted a change of scope to Project J-12354-23 to relocate an additional 11 beds under the new Project ID J-12563-24. The expected completion of the new Wake County building is in October 2028.

Due to the condition of Golden Years, we propose transitioning the 58 SNF beds and residents to two facilities within Cumberland County:

20 SNF beds to Woodlands Nursing and Rehabilitation Center (NH0577)

- 38 SNF beds to Highland House Rehabilitation and Healthcare (NH0117)

Both buildings have adequate space in their Assisted Living wings to accommodate these beds, and we plan to temporarily cease operating the AL beds to make this transition.

This is intended as a temporary solution to continue utilizing the beds within Cumberland County until the new building in Wake County (J-12563-24) is complete. Once that project is finalized, the 58 SNF beds will be moved to Wake County as currently approved. This transition will not affect current resident care or future demand; in fact, it will enhance the quality of care for residents currently at Golden Years.

We are open to scheduling a call with our Ops team to discuss any questions or concerns you may have about moving forward with this plan.

Regards,

Timothy J. Walsh

Director of Business Development

Liberty Senior Living

Office: 910-332-1982

Mobile: 910-512-9191

TWalsh@libertyseniorliving.com

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