



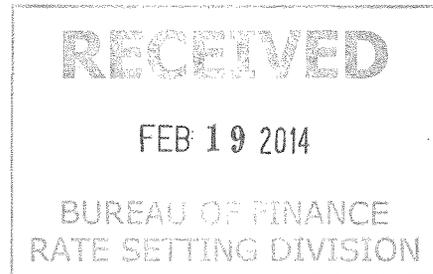
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February 18, 2014

Via email: RA-PartReview@pa.gov

Commonwealth of Pennsylvania  
Pennsylvania Department of Public Welfare  
Office of Long-Term Living  
Bureau of Finance  
Forum Place, 6<sup>th</sup> Floor  
555 Walnut Street  
Harrisburg, PA 17101  
Attn: Participation Review Unit



**RE: Comment to 2013 Group Two Bed Request  
JD13003: Kling Health, L.P.**

Dear Participation Review Unit:

Please accept the following comment in response to the 2013 Group Two Bed Request, and specifically the request of Kling Health, L.P. number JD13003, to open a 121-bed skilled nursing facility at 200 South Main Street, Athens, PA 18810.

There are currently ten skilled nursing facilities in the surrounding Athens area. Four of which, are owned by Guardian Elder Care; these are Carleton Senior Care, located in Tioga County, Darway Elder Care and Highlands Care Center, both located in Sullivan County, and Meadow View Senior Living, located in Susquehanna County.

Occupancy statistics currently show that the Guardian Elder care skilled nursing facilities provide the coverage and care expected by the consumer. Over the past five years, whole house occupancy has averaged 90% with capacity remaining and Medicaid occupancy has average 70% with capacity remaining as well. Statistics in the Athens/Bradford area are more convincing that coverage and care are well maintained.

Therefore, it is in Guardian's opinion that Kling Heath, L.P. application should be denied given the unnecessary impact to the Department and the current capacity / occupancy climate in the Athens area.

Respectfully,

Eddy J. Inzaba