

Administrator  
James Shadduck

Commissioners  
Mark Smith  
John Sullivan  
Douglas McLinko



June 17, 2013

Ms. Anne Henry  
Gary Alexander  
Commonwealth of Pennsylvania  
Pennsylvania Department of Public Welfare  
Office of Long Term Living  
Bureau of Policy and Strategic Planning  
Forum Place – 5<sup>th</sup> Floor  
555 Walnut Street  
Harrisburg, PA 17101

REFER TO \_\_\_\_\_  
LIC MIT RATES  
13 JUN 19 PM 4:21  
RECEIVED

Re: Request to transfer 24-bed to Sayre House in Athens, PA

Dear Mr. Alexander,

We noted a request in May for a transfer of 24-beds to Sayre House in Athens, PA. It is assumed that those 24-beds are coming from Ashton Care Center and a portion of them have not been in use for 20 plus months.

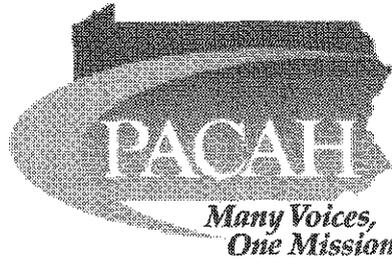
As the administrator of the Bradford County Manor we are concerned about the impact of any additional beds in Bradford County. We are currently a licensed 200 bed facility with a census of 166 residents. Ashton Care Center was closed for over 10 months and our census never increased above 173, which indicates there is not a need for additional beds. A number of the beds filled at Ashton prior to the flood in September of 2011 were able to be filled by New York state Medicaid clients.

When Ashton re-opened they took New York State Medicaid clients and just barely got to a census of 60 residents and now sit at a census of 37 residents. Even with them at 60 residents there were still open beds at Sayre House, Memorial SNF and the Bradford County Manor. Guardian also owns a couple of beds just outside the Bradford County lines and they have open beds as well.

We currently have a very low unemployment rate in Bradford County due to being the largest county with well pads drilled. Adding additional beds in Bradford County will not improve the care of any facility.

Thus, we would like to request that the transfer beds in Bradford County be denied.

Sincerely,  
  
James Shadduck  
Administrator



June 27, 2013

Commonwealth of Pennsylvania  
Pennsylvania Department of Public Welfare  
Office of Long-Term Living  
Bureau of Policy and Strategic Planning  
Forum Place – 5<sup>th</sup> Floor  
555 Walnut Street  
Harrisburg, Pa. 17101

Re: Bed Transfer request #TR13005

To Whom It May Concern:

I am writing this letter in opposition to the proposed 24 bed transfer request referenced above. This letter is written on behalf of the Pennsylvania Association of County Affiliated Homes (PACAH), which represents all of the county nursing facilities in the Commonwealth, as well as a number of for profit, not for profit and veterans' nursing facilities. PACAH is an affiliate of the County Commissioners Association of Pennsylvania.

Currently the Medicaid payment rate to nursing facilities is not adequate enough to cover their expenses. For three years our payments have been stagnant, leading to painful budgetary decisions just to allow for the continued operation of many of our facilities. Adding more Medicaid beds into a system that is already underfunded is not prudent or necessary at this time. In addition the proposed applicant has not demonstrated a need for these additional beds in Bradford County. A review of the current census/occupancy rates of other facilities in Bradford County does not indicate any need for these additional beds. Therefore we urge you to reject this application. If you have any questions feel free to contact me. Thank you for the opportunity to comment.

Sincerely,

Michael J Wilt  
PACAH Executive Director

17 North Front Street, Harrisburg, PA 17101  
Phone: (717)232-7554 \* Fax: (717)232-8390  
[www.pacahpa.org](http://www.pacahpa.org)

An Affiliate of the County Commissioners Association of Pennsylvania