



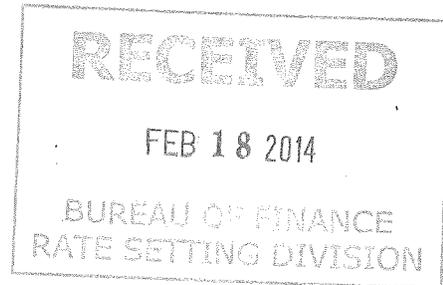
Genesis HealthCareSM

February 14, 2014

Via email: RA-PartReview@pa.gov

101 East State Street
Kennett Square, PA 19348
Tel 610 444 6350

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



**Re: Comment to 2013 Group Two Bed Requests
JD13004; Tulip Special Care**

Dear Participation Review Unit:

Please accept the following comment in response to the 2013 Group Two Bed Requests, and specifically the request of Tulip Special Care, numbered JD13004, to open an 85-bed ventilator-care unit for Medical Assistance patients at 2301 East Allegheny Avenue, Philadelphia, Pennsylvania 19134.

Genesis HealthCare owns two skilled nursing facilities that provide ventilator care to patients in the Philadelphia area. These facilities are Somerton Center, located in Philadelphia County, and Garden Spring Center, located near Philadelphia in Montgomery County. Both facilities serve patients from Philadelphia and the surrounding areas.

Both Somerton Center and Garden Spring Center will be expanding their capacity to serve ventilator-dependent patients. Somerton Center intends to add an additional twelve (12) beds specifically focused on the care of ventilator-dependent patients, in addition to its sixteen (16) existing beds. It is the intent of Somerton that those additional beds will be in service by September 2014. Garden Spring intends to add eighteen (18) ventilator-dependent beds, in addition to its thirteen (13) existing beds, which it intends to have in service by July 2014. Neither of these additions will require additional Medical Assistance beds; instead, both centers will be making adjustments to the beds in their currently existing capacity.

In addition to the foregoing, Genesis respectfully submits that the Tulip applicants have failed set forth adequate information to support their proposal. By way of example, the applicants have failed to include any of the required financial information that would indicate the financial feasibility of their project. Similarly, they have also failed to demonstrate any prior experience in operating a skilled nursing facility, especially a facility specializing in ventilator-dependent

patients. This is further underscored by the presentation of form policies and procedures, indicating that the operational aspects of the facility have not been thoroughly contemplated by the applicants.

The applicants have not set forth any information indicating that they have any knowledge or experience in providing care to medically fragile, ventilator-dependent patients, or that their project would be feasible either financially or operationally. As such, Genesis respectfully requests that the Department deny the applicants' request at this time.

Sincerely,

A handwritten signature in black ink that reads "Walter Kielar/cs". The signature is written in a cursive style with a clear, legible font.

Walter Kielar
Senior Vice President, Operations – Centers