

**STATE AGENCY ACTION REPORT**  
**ON APPLICATION FOR CERTIFICATE OF NEED**

**A. PROJECT IDENTIFICATION**

1. **Applicant/CON Action Number**

**Okeechobee SNF Operations, LLC d/b/a Okeechobee Health Care Facility/CON #10754**

2901 Stirling Road, Suite 200  
Fort Lauderdale, Florida 33312-6503

Authorized Representative: Mr. Jacob Bengio, VP of Finance and CFO  
Ventura Services – Florida  
(954) 300-3878 Ext. 102

2. **Service District/Subdistrict**

District 9/Subdistrict 9-3 (Okeechobee County)

**B. PUBLIC HEARING**

A public hearing was not requested or held regarding the proposed project.

**C. PROJECT SUMMARY**

**Okeechobee SNF Operations, LLC d/b/a Okeechobee Health Care Facility (CON application #10754)**, also referenced as Okeechobee SNF or the applicant, proposes to add 15 community nursing home beds to its existing 210 community nursing home bed facility located at 1646 US Highway 441 N, Okeechobee, Florida 34972 in Subdistrict 9-3.

The applicant shares that it is affiliated with Ventura Services Florida LLC, which is stated to have 13 Florida nursing homes and an experienced group of managers that will provide clinical support and consulting services.

Okeechobee SNF confirms that the existing facility currently has 84 semi-private (double occupancy) rooms, 18 private rooms, and six four-bed rooms with the 15 beds becoming part of a new 28-bed wing

consisting of all private rooms. The applicant states that thirteen beds needed to fill the new wing will come from the relocation of beds from the six four-bed wards and one semi-private room, which will permit the updating of its configuration to modern standards through the elimination of its four-bed rooms and improve quality and health care access.

Okeechobee SNF indicates that the project will be licensed in June 2026 and begin service in July 2026.

The project involves 22,100 gross square feet (GSF) of new construction with a cost of \$7,735,000. The total project cost is \$10,625,409, and includes land, building, equipment, project development and financing costs.

The applicant does not propose any conditions on the project.

*Issuance of a CON is required prior to licensure of the project. The review of a CON application and ultimate approval or denial of a proposed project is based upon the applicable statutory criteria in the Health Facility and Services Development Act (408.031-408.045, Florida Statutes) and applicable rule criteria within Chapters 59C-1 and 59C-2, Florida Administrative Code. An approved CON does not guarantee licensure of the proposed project. Meeting the applicable licensure requirements and licensure of the proposed project is the sole responsibility of the applicant.*

#### **D. REVIEW PROCEDURE**

The evaluation process is structured by the certificate of need review criteria found in Section 408.035, Florida Statutes. These criteria form the basis for the goals of the review process. The goals represent desirable outcomes to be attained by successful applicants who demonstrate an overall compliance with the criteria. Analysis of an applicant's capability to undertake the proposed project successfully is conducted by assessing the responses provided in the application, and independent information gathered by the reviewer.

Applications are analyzed to identify strengths and weaknesses in each proposal. If more than one application is submitted for the same type of project in the same subdistrict, applications are comparatively reviewed to determine which applicant best meets the review criteria.

Section 59C-1.010(3)(b), Florida Administrative Code, allows no application amendment information subsequent to the application being deemed complete. The burden of proof to entitlement of a certificate

rests with the applicant. As such, the applicant is responsible for the representations in the application. This is attested to as part of the application in the Certification of the applicant.

As part of the fact-finding, the consultant, Sarah Zimmerman, analyzed the application with consultation from Financial Analyst Kimberly Noble of the Bureau of Central Services, who evaluated the financial data, and Scott Waltz of the Office of Plans and Construction, who reviewed the application for conformance with the architectural criteria.

**E. CONFORMITY OF PROJECT WITH REVIEW CRITERIA**

The following indicate the level of conformity of the proposed project with the criteria and application content requirements found in Florida Statutes, Sections 408.035, and 408.037; applicable rules of the State of Florida, Chapter 59C-1 and 59C-2 and Florida Administrative Code.

**1. Fixed Need Pool**

**a. Does the project proposed respond to need as published by a fixed need pool? Or does the project proposed seek beds or services in excess of the fixed need pool? Rule 59C-1.008(2), Florida Administrative Code.**

In Volume 49, Number 190 of the Florida Administrative Register dated September 29, 2023, a fixed need pool (FNP) of 15 community nursing home beds was published for Subdistrict 9-3 for the July 2026 planning horizon. As of August 11, 2023, Subdistrict 9-3 nursing homes consist of the applicant's 210 licensed beds and there are no CON approved community nursing home beds pending licensure. Okeechobee Health Care Facility reported 89.72 percent occupancy in the six months, and 84.53 percent occupancy during the 12 months ending June 30, 2023.

Okeechobee SNF indicates the 15-bed project is in response to the fixed need pool. The applicant notes that Okeechobee is a rural county, whose population is sparsely dispersed throughout the planning area with a concentration at the southern end near Lake Okeechobee and the only city is Okeechobee City. U.S. Census Bureau 2020 Census Counts is provided in the applicant's table below.

**Okeechobee 2020 Census Counts**

<b>Census County Division</b>	<b>2020 Population</b>	<b>%</b>	<b>Census Designated Place</b>	<b>2020 Population</b>	<b>%</b>
<b>North Okeechobee CCD</b>	<b>8,740</b>	<b>22.05%</b>	Cypress Quarters CDP	1,029	2.60%
<b>Okeechobee CCD</b>	<b>30,904</b>	<b>77.95%</b>	Okeechobee City	5,254	13.25%
<b>Okeechobee County</b>	<b>39,644</b>	<b>100%</b>	Taylor Creek CDP	4,470	11.28%
			Remainder of Okeechobee CCD	20,151	50.83%
			<b>Okeechobee CCD</b>	<b>30,904</b>	<b>77.95%</b>

Source: CON application #10754, page 1-3, Table 1-1 from U.S. Census Bureau, [www.census.gov](http://www.census.gov).

As shown above, Okeechobee City makes up approximately 13.3 percent, Taylor Creek 11.3 percent and Cypress Quarters 2.6 percent of the county's population. North Okeechobee Census County Division accounts for 22.05 percent of the population, with 77.95 percent residing in the southern portion of the county. The applicant indicates that the April 1, 2023 population estimate for the City of Okeechobee is 5,361, or a 2.04 percent growth rate from the 2020 census.

The application's Figures 1-1 and 1-2 (maps) on pages 1-2 and 1-3 and Figure 1-3 on page 1-6 provide visual examples and an aerial view showing the project site and its location to area health care facilities. Okeechobee SNF notes that it serves all of Okeechobee County and that there are no other SNFs within a 20-mile radius of its facility. Further, its facility is adjacent to the sole hospital in the county, Raulerson Hospital, and along with Resolute Pain Solutions, a pain management clinic, forms a health care hub for the county. The applicant contends that the population and health care services are concentrated along the coast which confirms the importance of the facility in serving the needs of Subdistrict 9-3 and the surrounding rural areas.

Okeechobee SNF reiterates that its project adds 15 community nursing home beds to the current 210-bed facility bringing its capacity to 225 beds. The project will be a part of a new 28-bed wing consisting of all private rooms compared to the current 84 semi-private (double occupancy) rooms, 18 private rooms, and six four-bed rooms. Thirteen beds to fill the new wing will be from the relocation of beds from the six four-bed wards and one semi-private room, which will update its configuration to modern standards through the elimination of its four-bed rooms.

The applicant restates that its existing facility serves short-term rehabilitation residents, complex care, long-term care residents, and those requiring memory care. In addition, the new residential rooms will have a private bathroom with a wheelchair accessible shower with the building complying with all applicable regulations to provide a modern design in a safe environment and provides additional space for short-term rehabilitation care, which continues to increase demand.

Okeechobee SNF’s table below shows the subdistrict’s elderly population will increase over the next five years, adding 862 persons, at a five-year growth rate of about 11 percent and that the residents under the age of 65 will add 528, increasing at a rate of 1.69 percent demonstrating that there is a future need for residential and health services that cater to the senior population. By 2028, the projected senior population of 8,763 will represent 21.66 percent of the total population of 40,457, up from 20.22 percent in 2023, which indicates an aging population.

Okeechobee SNF states that as the sole nursing home provider in Subdistrict 9-3, the facility’s high occupancy rate shows that additional beds need to be added to accommodate demand and ensure residents have access to skilled nursing care without having to travel out of the county. The applicant uses the population estimates below to support the fixed need pool, growth in the elderly population for the planning area, and that the project is needed.

**Current and Projected Population by Age Cohort, Subdistrict 9-3, and Florida**

Area	January 2023 Population Estimates			January 2023 Population Estimates		
	0-64	65+	Total	0-64	65+	Total
Subdistrict 9-3	31,166	7,901	39,067	79.78%	20.22%	100.00%
Florida	17,622,850	4,864,166	22,487,016	78.37%	21.63%	100.00%
Area	January 2028 Population Estimates			January 2028 Population Distribution		
	0-64	65+	Total	0-64	65+	Total
Subdistrict 9-3	31,694	8,763	40,457	78.34%	21.66%	100.00%
Florida	18,281,793	5,636,261	23,918,054	76.44%	23.56%	100.00%
Area	Five Year Increase			Five Year Growth Rate		
	0-64	65+	Total	0-64	65+	Total
Subdistrict 9-3	528	862	1,390	1.69%	10.91%	3.56%
Florida	658,943	772,095	1,431,038	3.74%	15.87%	6.36%

Source: CON application #10754, page 1-8, Table 1-2

Okeechobee SNF argues that because Okeechobee County is largely rural with its facility being the area’s only nursing home, HCA Raulerson Hospital the only hospital and Grand Oaks of Okeechobee, Inc. the only assisted living facility (ALF), residents have fewer choices and high demand on these providers. Further, no home health agencies are based in Okeechobee County. Okeechobee SNF’s table below compares available ALF and home health services in Subdistrict 9-3 to District 9.

**Assisted Living and Home Health Availability  
in Okeechobee County and District 9**

Area	1/1/2023 Population 65+	Assisted Living	ALF Beds	ALF Beds Per 1,000	Home Health Agencies	HHA's Per 1,000
Okeechobee	7,901	1	37	4.7	1	0.13
District 9 Total	578,277	315	11,351	19.6	355	0.61

Source: CON application #10754, page 1-9, Table 1-3

The applicant confirms that the only assisted living has less than five beds per 1,000 when compared to 19 for District 9 adding that the one home health agency is 0.13 per 1,000 elderly, compared to 355 agencies, or 0.61 per 1,000 elderly throughout District 9. Okeechobee SNF argues that this is not to say that community-based services are a substitution for skilled nursing care, as patients do have a choice in their care options; however, the options are limited within Okeechobee County which results in more residents relying on the nursing home when rehabilitating from an acute injury or illness, and when suffering from long-term debilitating conditions.

Okeechobee SNF offers that it also provides memory care which is unavailable elsewhere in Okeechobee County adding that this service places a greater demand on its facility when compared to other nursing homes throughout District 9. The applicant states that the nursing home use rates by subdistrict support this and cites the average nursing home occupancy rate for each subdistrict below.

**Nursing Home Beds and Use Rates for the Current Period**

<b>County (Subdistrict)</b>	<b>Licensed Community Beds</b>	<b>Jul 22-Jun 23 Bed Days</b>	<b>Jul 22-Jun 23 Patient Days</b>	<b>1/1/2023 Population 65+</b>	<b>Days per 1,000</b>	<b>Avg. Facility Occup.</b>
Indian River (1)	554	202,210	165,610	53,960	3,069	81.90%
Martin (2)	795	290,175	246,681	52,493	4,699	85.01%
Okeechobee (3)	210	76,650	64,793	7,901	8,201	84.53%*
Palm Beach (4)	5,927	2,163,355	1,675,999	382,752	4,379	77.47%
St. Lucie (5)	1,050	383,250	294,187	81,171	3,624	76.76%
<b>District 9 Total</b>	<b>8,536</b>	<b>3,115,640</b>	<b>2,447,270</b>	<b>578,277</b>	<b>4,232</b>	<b>78.55%</b>
Florida	83,110	30,252,800	24,103,610	4,864,166	4,955	79.67%

Source: CON application #10754, page 1-9, Table 1-4

\*Note: Okeechobee's occupancy increased to 92.07% in the second quarter of 2023.

The applicant argues that when compared to the state, the district averages 4,232 patient days per 1,000 residents aged 65 and over which is below the states' 4,955 days per 1,000 adding that Subdistrict 9-3's use rate of 8,201 nursing home patient days per 1,000 elderly outpaces all the other District 9 subdistricts and the state, indicating strong demand for skilled nursing care beds.

Okeechobee SNF notes that its occupancy rate was higher than both District 9 at 78.55 percent and Florida's 79.67 percent. The applicant confirms that the facility reported 17,594 patient days (92 percent occupancy) and argues that its occupancy rate has increased over the past year. The applicant contends that as the facility grew, demand grew as well, keeping the facility at or near full capacity, often with a waiting list and notes that the need is both facility-specific and subdistrict-wide with its location next door to Raulerson Hospital contributing to the high demand, especially for short-term rehabilitation.

**Okeechobee Health Care Facility, District 9, and Florida  
Community Nursing Home Utilization  
Last Five-Year Periods Ending June 30, 2023**

Annual Period	Patient Days			Occupancy Rate		
	Okeechobee Health Care Facility	District 9	Florida	Okeechobee Health Care Facility	District 9	Florida
7/18 - 6/19	64,124	2,617,387	25,088,910	97.60%	83.90%	85.03%
7/19 - 6/20	63,721	2,562,371	25,073,890	96.72%	82.02%	83.94%
7/20 - 6/21	55,242	2,171,495	22,098,751	84.08%	69.74%	73.40%
7/21 - 6/22	53,686	2,247,334	22,817,381	74.07%	72.12%	75.49%
7/22 - 6/23	64,793	2,447,270	24,103,610	84.53%	78.55%	79.67%

Source: CON application #10754, page 1-10, Table 1-5

Okeechobee SNF offers the table below which summarizes admissions by source for CY 2022 adding that of the total 3,041 discharges for the elderly age cohort, 1,855, or 61 percent, stayed within Okeechobee for hospital care, meaning 39 percent left the county for care and of the total discharges for the elderly, 404 or 13.3 percent were discharged to a skilled nursing facility following a hospital stay.

**Total Acute Care Hospital Discharges for Okeechobee Residents Age 65+ and  
Discharges to Nursing Homes by Hospital County, CY 2022**

Hospital County	Total Cases Age 65+	Total Cases Age 65+	Okeechobee Residents 65+ Discharged to SNF	Percent of 65+ Cases Discharged to SNF
Okeechobee	1,855	61.00%	261	64.60%
Sarasota	726	23.87%	97	24.01%
Palm Beach	173	5.69%	17	4.21%
Martin	62	2.04%	5	1.24%
Indian River	45	1.48%	4	0.99%
Highlands	45	1.48%	4	0.99%
Hillsborough	27	0.89%	1	0.25%
Miami-Dade	26	0.85%	3	0.74%
Broward	24	0.79%	0	0.00%
Orange	12	0.39%	2	0.50%
St. Lucie	3	0.10%	1	0.25%
All Others	43	1.41%	9	2.23%
<b>Grand Total</b>	<b>3,041</b>	<b>100.00%</b>	<b>404</b>	<b>100.00%</b>

Source: CON application #10754, page 1-12, Table 1-6

The applicant provides a table showing Raulerson Hospital CY 2022 discharges by patient county showing that Okeechobee residents accounted for over 85 percent (3,251 of 3,789) of the hospital's discharges. Okeechobee SNF notes that 261 of Raulerson's 1,855 of age 65 and over Okeechobee County resident discharges were to SNF care which is roughly 14 percent of the hospital's total, underscores "the need for skilled nursing care".

Okeechobee SNF projects an average daily census of 199 residents with seven attributed to the project’s 15 beds in the first year, and 206 residents with 13 attributed to the 15 beds in the second year. The applicant states that its initial occupancy rate in the first year reflects a ramp up of utilization in the bed addition, averaging 43.87 percent in the first year and 85.97 percent in year two. The total facility will experience a slight drop in the occupancy to 91.43 percent in project’s year one, ramping up to 94.6 percent in the second year, reflective of the facility's ongoing high demand.

**Forecasted Patient Days for Okeechobee Health Care Facility  
First Two Years after Completion of the Project  
(Total Facility of 225 Beds)**

Payer	Admissions		Patient Days		Patient Day Percentage	
	Year One	Year Two	Year One	Year Two	Year One	Year Two
Medicare	178	213	14,239	17,111	19.57%	22.73%
Medicare HMO	31	30	3,475	3,369	4.78%	4.47%
Medicaid	0	0.0%	2,979	2,889	4.09%	3.84%
Medicaid HMO	39	39	46,855	46,853	64.38%	62.23%
Self-Pay	67	65	4,765	4,621	6.55%	6.14%
Other	1	1	461	447	0.63%	0.59%
<b>Total</b>	316	348	72,774	75,290	100%	100%

Source: CON application #10754, page 9-2, Table 9-1

The applicant concludes that it has established consistency with the published need for 15 community nursing home beds and demonstrates entitlement to the certificate of need sought, based on:

- Population Demographics & Dynamics
  - Subdistrict 9-3’s high occupancy rate shows that additional beds be added to accommodate demand and ensure residents have access to skilled nursing care without having to travel out of the county
- Demand for Skilled Care
  - Subdistrict 9-3’s options are limited which results in more residents rely on the nursing home when rehabilitating from an acute injury or illness, and when suffering from long-term debilitating conditions
- Facility Specific Demand
  - Applicant contends that as the facility grew, demand grew as well, keeping the facility at or near full capacity, often with a waiting list and notes that the need is both facility-specific and subdistrict-wide with it being the sole provider and its location next door to Raulerson Hospital contributing to the high demand, especially for short-term rehabilitation.
- Projected Utilization
  - Reflective of the facility's ongoing high demand



- The applicant is an experienced provider capable of mainlining a quality, five-star facility, offering a variety of services to meet the area's needs.
- The project has a positive effect on the community, promotes access, and is financially feasible in both the short-term and long-term, assuring a successful, viable facility.

## 2. Agency Rule Preferences

**Does the project respond to preferences stated in Agency rules? Please indicate how each applicable preference for the type of service proposed is met. Rule 59C-1.036, Florida Administrative Code.**

Chapter 59C-1.036 of the Florida Administrative Code does not contain preferences relative to community nursing home beds nor does the Agency for Health Care Administration publish specific preferences for these facilities. However, the rule does contain standards the Agency utilizes in assessing the applicant's ability to provide quality care to the residents.

- a. **Proposed Services. Applicants proposing the establishment of Medicare-certified nursing facility beds to be licensed under Chapter 400, Florida Statutes, shall provide a detailed description of the services to be provided, staffing pattern, patient characteristics, expected average length of stay, ancillary services, patient assessment tools, admission policies and discharge policies.**

Okeechobee SNF indicates that in order to determine the level of need for specific services to be offered, it analyzed CY 2022 hospital discharges to nursing homes for Okeechobee County residents age 65+, by Major Diagnostic Categories (MDCs) to determine the types of conditions and disorders that would be admitted to a SNF. The applicant identified 19 MDCs discharges from hospital to SNFs for Okeechobee County residents age 65+. See the table below.

**Acute Care Hospital Discharges to Nursing Homes by Major Diagnostic Category (MDC)  
Okeechobee County Residents Aged 65 Years and Older, CY 2022**

MDC	Cases	% of Cases
08 Diseases & Disorders of the Musculoskeletal System and Conn Tissue	90	21.05%
05 Diseases & Disorders of the Circulatory System	61	16.07%
04 Diseases & Disorders of the Respiratory System	45	11.49%
01 Diseases & Disorders of the Nervous System	44	10.53%
18 Infectious & Parasitic Diseases, Systemic or Unspecified Sites	39	9.72%
11 Diseases & Disorders of the Kidney & Urinary Tract	25	5.96%
10 Endocrine, Nutritional and Metabolic Diseases & Disorders	20	5.15%
06 Diseases & Disorders of the Digestive System	17	3.78%
09 Diseases & Disorders of the Skin, Subcutaneous Tissue & Breast	11	2.77%
19 Mental Diseases & Disorders	10	2.58%
16 Diseases & Disorders of the Blood, Blood-Forming Organs, Immun Disorders	8	2.37%
23 Factors Influencing Hlth Status & Other Contacts with Hlth Status	8	1.98%
07 Diseases & Disorders of the Hepatobiliary System & Pancreas	6	1.20%
24 Multiple Significant Trauma	6	1.39%
21 Injuries, Poisonings & Toxic Effects of Drugs	5	1.58%
03 Diseases & Disorders of the Ear, Nose, Mouth & Throat	3	0.79%
00 Pre MDC	2	0.40%
12 Diseases & Disorders of the Male Reproductive System	2	0.59%
22 Burns	2	0.60%
<b>Total</b>	<b>404</b>	<b>100.0%</b>

Source: CON application #10754, page 2-3, Table 2-1 from AHCA hospital discharge data, CY 2022.

Okeechobee SNF’s table indicates that the top four MDCs account for 59.14 percent of the discharges. The applicant states other prominent diagnosis include MDCs 18, 01, 11, and 06, noting that the remaining categories account for fewer than 20 cases each. However, the applicant’s chart indicates that MDC 06 accounts for 17 discharges while MDC 10 had 20 discharges.

Okeechobee SNF indicates that its location (adjacent to Okeechobee County’s only hospital) places continued demand for short-term rehabilitation. The applicant maintains that the 15-bed addition will allow the facility to accept a greater number of residents rehabilitating from an acute injury/illness while still meeting the long-term needs of the community. Further, the 210-bed facility with 18 private rooms will have licensed nursing staff available 24 hours a day. Trained staff will implement the services residents require for their plan of care that include therapists, nurses, social workers, and others who work as a team to provide care. Schedule 6A, behind Tab 5, Resources, lists the types and numbers of staff for the facility and the project. Okeechobee SNF briefly describes its services which include:

- Physical, occupational and speech therapies
- Orthopedic rehabilitation
- Neurological rehabilitation
- Pulmonary rehabilitation

- Medical management
- Palliative care
- Hospice care
- Wound care

Okeechobee SNF indicates that a recommendation from a physician is required to gain admission to the existing facility and that upon admission, each resident is provided an orientation of the facility as well as an initial assessment. Each resident receives an admission packet detailing the agreement between the facility and the resident and the resident receives a comprehensive assessment utilizing the CMS assessment tool incorporating the “Minimum Data Set” elements as well as those elements specific to Florida. The resident must participate in the assessment and completion of a Pre-Admission Screen and Resident Review (PASRR), which identifies serious mental illness and intellectual disabilities that may preclude a specific type of SNF placement. Further, residents are reassessed as their condition changes and if there is no demonstrable change, staff completes a portion of the assessment quarterly with the full assessment completed annually.

Regarding a care plan, Okeechobee SNF indicates that when admitted, the facility develops a baseline care plan within 48 hours of admission. The applicant notes that resident-centered comprehensive care plans require completion within seven days and that an interdisciplinary team prepares the care plan, with participation of the attending physician, registered nurse, nurse aide, as well as food and nutrition staff. Okeechobee SNF points out that the resident should participate in the care plan development process and that if it is not practical to include the resident, the medical record documents as to why the resident did not participate.

The applicant contends that an individualized care plan must include measurable objectives and timetables that meet the resident’s medical, nursing, mental and psychosocial needs. According to the applicant, a care plan builds on the resident’s strengths and discharge goals, while incorporating identified problems and risk factors. Okeechobee SNF indicates that a member from social services notifies the resident’s family or representative of care plan meetings.

Okeechobee SNF confirms that it is aware of Florida's Long-Term Care Ombudsman Program and Resident Rights and that upon admission, program information is given to residents addressing their rights at the facility. Further, staff receive appropriate training to delineate nursing home federal requirements for resident rights which ensures that all staff is prepared and trained to provide all residents the highest measure of dignity, courtesy, and good care that is expected by the residents, the

families, and by the community. The applicant states that a copy of the resident rights information distributed to residents, including contacts for filing complaints, is provided in Exhibit 1 at the end of the application.

Regarding discharge, a resident-specific discharge plan begins when the resident is admitted to the facility and this plan incorporates the resident's goals for care, treatment preferences and needs associated with reducing preventable readmissions. Okeechobee SNF maintains that the plan includes an assessment of caregiver needs along with whether the resident has access to a caregiver or support capable of providing the type of care needed. The post-discharge plan of care indicates where the resident will reside, the arrangements already made for follow-up care, and medical/non-medical services needed. Okeechobee SNF notes that staff follow-up with agencies to which a resident was referred to ensure the resident is receiving necessary services after discharge.

A sample of discharge planning forms, and a template for the post-discharge plan of care is included in the application's Exhibit 2.

Okeechobee SNF states that it will participate in both the Medicare and Medicaid programs to promote access to both short-term and long-term care. The applicant refers to its Schedule 7 for its admissions and patient days by payer and its Schedule 6A for its staffing by department noting that it meets or exceeds staffing standards as well as its Section 5, Resources for further detail of its staffing patterns and utilization.

Schedule 7 indicates the project will not serve Medicaid/Medicaid HMO residents in year one (ending June 30, 2027). Medicaid/Medicaid HMO is projected to be 1,416 (30.0 percent) of the project's total year two (ending June 30, 2028) patient days. Medicaid/Medicaid HMO represents 49,835 (68.47 percent) of the 225-bed facility's year one and 49,745 (66.07 percent) of year two's total patient days.

The applicant's Schedule 6A shows a total of 232.60 FTEs in year one (ending June 30, 2027) which includes 5.9 FTEs added by the 15-bed addition and 237.30 FTEs in year two (ending June 30, 2028) which includes 10.60 FTEs for the project.

**Okeechobee Health Care Facility  
Projected Utilization Years One and Two  
15-Bed Addition and Total 225-Bed Facility**

	15-Bed Addition		225-Bed Facility	
	Year One	Year Two	Year One	Year Two
Admissions	46	65	316	348
Resident Days	2,402	4,720	72,775	75,293
ALOS (days)	52	73	230	216
ADC	7	13	199	206

Source: CON application #10754, page 2-8, Table 2-2

Okeechobee SNF notes that the 15 new beds reflect a shorter average length of stay than the total facility because the 15 beds are projected to serve the growing demand for Medicare patients, who have a shorter length of stay than Medicaid residents.

**b. Rule 59C-1.036 (4)(e) Quality of Care. In assessing the applicant’s ability to provide quality of care pursuant to s. 408.035(3), Florida Statutes, the Agency shall evaluate the following facts and circumstances:**

**1. Whether the applicant has had a Chapter 400, Florida Statutes, nursing facility license denied, revoked, or suspended within the 36 months prior to the application.**

The applicant states that Okeechobee SNF Operations, LLC has never had a license denied, revoked, or suspended.

**2. Whether the applicant has had a nursing facility placed into receivership at any time during the period of ownership, management, or leasing of a nursing facility in the 36 months prior to the current application.**

The applicant responds that Okeechobee SNF and its managers have never had a nursing home placed into receivership.

**3. The extent to which the conditions identified within subparagraphs 1. and 2. Threatened or resulted in direct, significant harm to the health, safety or welfare of the nursing facility residents.**

This item does not apply.

**4. The extent to which the conditions identified within subparagraph 3. were corrected within the time frames allowed by the appropriate state Agency in each respective state and in a manner satisfactory to the Agency.**

This item does not apply.

5. **Rule 59C-1.036 (4) (f) Harmful Conditions.** The Agency shall question the ability of the applicant to provide quality of care within any nursing facility when the conditions identified in subparagraph (e) 1 and (e) 2 result in the direct, significant harm to the health, safety, or welfare of a nursing facility resident, and were not corrected within the time frames allowed by the appropriate state agency in each respective state and in a manner satisfactory with the Agency.

This item does not apply.

6. **Rule 59C-1.036 (5) Utilization Reports.** Within 45 days after the end of each calendar quarter, facilities with nursing facility beds licensed under Chapter 400, Florida Statutes, shall report to the Agency, or its designee, the total number of patient days which occurred in each month of the quarter and the number of such days which were Medicaid patient days.

The applicant indicates it will continue to report required data to the Health Council of Southeast Florida and to the Agency.

**3. Statutory Review Criteria**

- a. **Is need for the project evidenced by the availability, quality of care, accessibility and extent of utilization of existing health care facilities and health services in the applicant's service area? Section 408.035 (1), (2) and (5), Florida Statutes.**

As of August 11, 2023, Subdistrict 9-3 had the applicant's 210 licensed and zero approved community nursing home beds. Okeechobee SNF reported 89.72 percent total occupancy during the six months, and 84.53 percent occupancy during the 12 months ending June 30, 2023, respectively. As previously stated, an FNP for 15 community nursing home beds in Subdistrict 9-3 was published in Volume 49, Number 190 of the Florida Administrative Register dated September 29, 2023.

Okeechobee SNF presents the following in support of need for the project with respect to the availability, quality of care, accessibility, financial access, and extent of utilization of existing health care facilities and health services within the service area. Availability is defined as how much of a resource exists. With respect to availability, Okeechobee SNF describes the availability of one SNF and 210 community nursing home beds within Okeechobee County - with an occupancy rate for the for the second quarter of 2023 of 92.07 percent and states that it often has a waiting list due to constant high occupancy - leaving Okeechobee County residents no other choice but to seek care outside of the service area.

Regarding quality of care, Okeechobee SNF maintains that it benefits from its affiliation with Ventura Services Florida LLC's experienced team that has the knowledge, tools, and expertise to continuously maintain high quality nursing home standards.

Okeechobee SNF states that its management is dedicated to improving the quality-of-care standards investing in technologies and utilizing protocols to engage staff in quality improvement initiatives and education. In addition, the applicant notes the proposed facility will be developed with a new 28-bed wing of all private rooms added onto the existing facility. There will be 15 beds for this wing added through this proposal with 13 other beds being relocated from the four-bed wards and one semi-private room resulting in the elimination of the outdated four-bed configuration which updates the facility by gaining more rooms that are built to current code and standards and can foster resident centric care.

Quality of care is addressed in item E.3.b. of this report.

Okeechobee SNF states that access refers to how readily the population to be served can get to the facility adding that the components of access include geographic impediments, distance, time to travel, and eligibility criteria for qualifying for the service and considerations such as financial cost and methods of reimbursement from third parties.

Okeechobee SNF includes a map (Figure 3-1 on page 3-4) that visually shows the drive time contour for Okeechobee Health Care Facility noting there are no other nursing homes within a 20-mile radius. The applicant states this 25-minute drive-time contour extends into rural portions of adjacent counties, including Martin, St. Lucie, Highlands, and Glades. Further, the applicant asserts that the map provides visibility to roadways that make the facility accessible to the population promoting the geographic access to needed skilled nursing beds supporting its claim that this project is an important community resource within, and extending outside, of Subdistrict 9-3.

Regarding financial access, Okeechobee SNF states that it will participate in both Medicare and Medicaid programs and will provide a wide range of services with separate neighborhoods for various patient needs, such as short-term rehabilitation, complex care, and long-term care needs. Further, it will make every effort to remove any financial barriers that could impede access to nursing home care, working closely with hospital discharge planners and those who may make direct admissions.

Okeechobee SNF reiterates its E.1.a response addressing access to services adding that hospitals reported 3,041 CY 2022 acute care discharges for Okeechobee County residents aged 65 with 404 of these being discharged to a skilled nursing facility, and 261 originating from Raulerson Hospital. The applicant states that of the total discharged to a nursing home, 90 cases were associated with MDC 8, Musculoskeletal System, including joint replacements and fractures; 61 cases were associated with cardiac patients and 45 were associated with MDC 4, respiratory system illness.

Okeechobee SNF notes that these 196 cases that are in the top three major diagnostic categories represent 48.61 percent of all cases discharged to nursing homes adding that these patients primarily benefit from rehabilitation programs such as those offered at Okeechobee Health Care Facility for their short-term residents, including orthopedic rehabilitation, cardiac rehabilitation, and respiratory care and that the facility will ensure beds are accessible to residents that require rehabilitative programs.

Okeechobee SNF offers that its facility uses telemedicine, particularly for geriatric specialists in psychiatry and psychology asserting that these specialists are in short supply and that this service alleviates the transportation challenges the facility faced. These appointments are stated to occur in the Quality Assurance Office, which has a large screen monitor and camera to facilitate the sessions and displays how the facility meets resident needs, providing necessary access to services, using technology to "bring" the service to the resident.

Health Care Access Criteria is addressed on the application's pages 3-7 through 3-9.

- b. Does The applicant have a history of providing quality of care? Has the applicant demonstrated the ability to provide quality care? Is the applicant a Gold Seal Program nursing facility that is proposing to add beds to an existing nursing home? Section 408.035(3) and (10), Florida Statutes.**

Okeechobee SNF reiterates that besides being both an Agency and CMS five-star rated facility, it routinely achieves five stars for all inspection components for AHCA's ratings for the rating time period from January 2021- June 2023 which are included in the application's Exhibit 3. The applicant also notes it achieved the American Health Care Association and National Center for Assisted Living's 2017 Silver Achievement in Quality award which is based on a SNF developing and demonstrating effective approaches to improve performance and health care outcomes. Patricia Ebanks, RN, ADON, IFC, Case Manager at Okeechobee Health Care Facility, was awarded the Florida Health Care Association's (FHCA)



Rising Star in Long Term Care Nursing during the 2017 Nurse Leadership Program. Ms. Ebanks has been with the facility since 2009 and is one of several facility employees with over 10 years' experience.

Okeechobee SNF believes that you "treat the resident as if you were the resident." With this approach, the facility is able to achieve its sustained five-star ratings and Gold Seal designation, guided by the following Vision and Mission. The reviewer notes that the facility was not listed as a Gold Seal facility as of January 29, 2024.

The applicant provides its mission and vision (page 4-2 of the application) and indicates that it utilizes several methods to monitor and improve quality - including examining satisfaction surveys, seeking a 90 percent satisfaction rate in all areas of facility operation and services. The reviewer notes that Ventura has 14 nursing homes in the state and that none of the facilities are Gold Seal Award facilities. De Luna Health and Rehabilitation Center, Martin Coast Center for Rehabilitation and Healthcare, North Dade Nursing and Rehabilitation Center, Olive Branch Health and Rehabilitation Center, Regents Park at Aventura, South Dade Nursing and Rehabilitation Center, and Washington Rehabilitation and Nursing Center are on the Agency Watch List. The Watch List identifies nursing homes that are operating under bankruptcy protection or met the criteria for a conditional status during the past 30 months.

Okeechobee SNF provides a narrative description of the 5 Stages of Quality Assurance and Performance Improvement or QAPI (pages 4-2 through 4-4 of the application). The applicant addresses CMS's QAPI at a Glance a step-by-step guide detailing 12 key action steps on pages 4-4 and 4-5 adding that it stays up to date on all state and federal requirements for QAPI.

Okeechobee SNF points out having written emergency management and hurricane preparedness plans and that the proposed project is constructed and equipped with generators to ensure residents have a safe, comfortable environment during times of power outages. The applicant maintains that its emergency management and hurricane preparedness plan address the following types of emergencies:

- Fire
- Weather emergencies such as tornadoes and hurricanes
- Security incidences such as bomb threats, terrorism, and active shooters
- Elopement
- Drowning
- Water loss.

Okeechobee SNF notes that it has a resident council that works to protect and improve the quality of life for residents and provide families with a voice in decisions affecting their loved ones. The applicant notes that residents' rights encompass a resident's role within the SNF as it pertains to choose, safety and quality of life. The applicant cites 27 specific resident rights. Okeechobee SNF states that it offers a variety of activities for its residents for all levels of cognition and physical abilities and the activities director plans the range of activities based on the individual care plans and resident requests.

Okeechobee SNF states that behavioral health care services are provided through a company called Fore-Front, which provides both psychiatry and psychology services adding that any resident that is on a psychotropic medication is seen at a minimum quarterly, or more often as needed and that residents who are not on behavioral medication are also seen by psychiatrists and psychologists if their behavior requires it. Residents are encouraged to speak with the psychologists at a minimum quarterly and that tele-medicine is conducted twice a week, one day with the psychiatrist, and the other with the psychologist.

Okeechobee SNF notes residents have multiple opportunities to participate in various forms of recreation for improving mind and body and that that family members are encouraged to participate in activities and events. Twelve specific activities offered include: art classes and crafts, birthday parties, special holiday celebrations, Ringin' and Singin', ice cream socials, bingo, musical performances, church services, bible study, walks and exercise, beachball volleyball, book club, and movies. The applicant asserts that the surrounding community remains actively involved at its facility and offers these include local elementary school students, organizations that bring approved pets to "visit", as well as children who are members of a local 4-H club.

The applicant details Okeechobee Health Care Facility's licensure history adding that it has been able to expand their bed count and obtain CONs due to their dedication to quality care. Okeechobee SNF reiterates that it will contract with Ventura Services Florida LLC, and provides Ventura's affiliated skilled nursing facilities utilization for the 12-month periods ending on June 30, 2022 and 2023, the application's page 4-9. The applicant notes that these facilities experienced a significant increase in occupancies compared to the previous year and contends that high occupancy rates are often an indicator of quality.

The table below summarizes Ventura affiliated nursing homes Centers for Medicare and Medicaid Services (CMS) star ratings.

**CMS Overall Ratings (Out of Five Stars) for Florida Nursing Facilities  
Affiliated with Ventura Services Florida**

Facility Name	Subdistrict	CMS Star Rating
Olive Branch Health and Rehab Center	1-1	4
De Luna Health and Rehab Center	1-1	5
Washington Rehabilitation and Nursing Center	2-1	4
Martin Coast Center for Rehabilitation & Healthcare	9-2	2
Okeechobee Health Care Facility	9-3	5
Harmony Health Center	11-1	4
Miami Springs Nursing and Rehabilitation Center	11-1	2
Sierra Lakes Nursing & Rehab Center*	11-1	2
South Dade Nursing & Rehab Center	11-1	1
North Dade Nursing & Rehab Center Regents Park at Aventura	11-1	2
Claridge House Nursing & Rehab Center	11-1	2
Waterford Nursing and Rehab Center (Healthcare Center of Waterford- 111341)	11-1	3
<b>Average</b>		<b>3</b>

Source: CON application #10753, page 4-10, Table 4-2.

Okeechobee SNF concludes its quality-of-care discussion stating that its responses “demonstrate the capability to implement a program of quality assurance with elements that lead to continuous quality improvement in the federal and state rating systems and achieve national recognition for quality improvement”.

The reviewer produced the table below showing the Ventura affiliated facilities most recent state and CMS ratings. Ratings are issued on a performance measure (star basis), with SNFs being issued stars ranging from one to five stars, with five stars being the highest rating.

**Ventura Services Florida Affiliated Facilities  
Nursing Home Guide Inspection Ratings**

Facility Name	Agency File Number	HF Overall Inspection Star Rating	CMS Overall Rating
Claridge House Nursing and Rehabilitation Center	111306	★★★★	★★
De Luna Health and Rehabilitation Center	35961086	★★★★★	★★★★★
Harmony Health Center	111314	★★★	★★★★
(HF)Healthcare Center of Waterford/(CMS) Waterford Nursing and Rehabilitation Center	111341	★	★★★
Martin Coast Center for Rehabilitation and Healthcare	94301	★★★	★★
Miami Springs Nursing and Rehabilitation Center	111309	★★★	★★
North Dade Nursing and Rehabilitation Center	111324	★	★★
Okeechobee Health Care Facility	94701	★★★★★	★★★★★
Olive Branch Health and Rehab Center	35961064	★★	★★★★
Regents Park at Aventura	111345	★★	★★
Sierra Lakes Nursing & Rehabilitation Center	11310	★★★	★★
South Dade Nursing and Rehabilitation Center	111313	★★★	★
Washington Rehabilitation and Nursing Center	26701	★★★	★★★★
<b>Average</b>		<b>2.92</b>	<b>2.92</b>

Source: <https://quality.healthfinder.fl.gov> and <https://www.medicare.gov/care-compare>  
CMS Last Updated: December 6, 2023.

The reviewer notes that Ventura has 14 nursing homes in the state and that none are Gold Seal Award facilities. De Luna Health and Rehabilitation Center, Martin Coast Center for Rehabilitation and Healthcare, North Dade Nursing and Rehabilitation Center, Olive Branch Health and Rehabilitation Center, Regents Park at Aventura, South Dade Nursing and Rehabilitation Center, and Washington Rehabilitation and Nursing Center are on the Agency Watch List. The Watch List identifies nursing homes that are operating under bankruptcy protection or met the criteria for a conditional status during the past 30 months.

During the 36 months ending December 20, 2023, Okeechobee Health Care Facility had no substantiated complaints while Ventura Services' 13 affiliated nursing homes had a total of 24 substantiated complaints with 28 categories cited. This does not include complaints that occurred prior to Ventura Services Florida operating the facility (see the table below).

**Okeechobee Health Care Facility Affiliates  
Substantiated Complaint History by Category  
36 Months Ending December 20, 2023**

<b>Complaint Category</b>	<b>Number Substantiated</b>
Administration/Personnel	3
Admission, Transfer & Discharge Rights	1
Dietary Services	1
Infection Control	1
Misappropriation of property	1
Pharmaceutical Services	1
Physical Environment	3
Quality of Care/Treatment	8
Resident/Patient/Client Abuse	4
Resident/Patient/Client Neglect	2
Resident/Patient/Client Rights	3
<b>Total</b>	<b>28</b>

Source: AHCA Substantiated Complaint Data.

**c. What resources, including health personnel, management personnel and funds for capital and operating expenditures, are available for project accomplishment and operation? 408.035(4), Florida Statutes**

The purpose of our analysis for this section is to determine if the applicant has access to the funds necessary to fund this and all capital projects. Our review includes an analysis of the short and long-term position of the applicant, parent, or other related parties who will fund the project. The analysis of the short and long-term position is intended to provide some level of objective assurance on the likelihood that funding will be available. The stronger the short-term position, the more likely cash on hand or cash flows could be used to fund the project. The stronger the long-term position, the more likely that debt financing could

be achieved if necessary to fund the project. We also calculate working capital (current assets less current liabilities) a measure of excess liquidity that could be used to fund capital projects.

Historically we have compared all applicant financial ratios regardless of type to benchmarks established from financial ratios collected from Florida acute care hospitals. While not always a perfect match to a particular CON project it is a reasonable proxy for health care related entities. The applicant provided audited financial statements, where the short-term and long-term measures fall on the scale (highlighted in gray) for the most recent year.

<b>CON 10754 Ventura Okeechobee Group</b>	<b>Dec-22</b>
Current Assets	\$4,359,224
Total Assets	\$34,593,050
Current Liabilities	\$4,299,567
Total Liabilities	\$29,195,155
Net Assets	\$1,098,328
Total Revenues	\$15,870,745
Excess of Revenues Over Expenses	(\$1,801,148)
Cash Flow from Operations	(\$3,239,676)
<b>Short-Term Analysis</b>	
Current Ratio (CA/CL)	1.0
Cash Flow to Current Liabilities (CFO/CL)	-78.99%
<b>Long-Term Analysis</b>	
Long-Term Debt to Net Assets (TL-CL/NA)	461.2%
Total Margin (ER/TR)	6.92%
<b>Measure of Available Funding</b>	
Working Capital	\$59,657

<b>Position</b>	<b>Strong</b>	<b>Good</b>	<b>Adequate</b>	<b>Moderately Weak</b>	<b>Weak</b>
Current Ratio	above 3	3 - 2.3	2.3 - 1.7	1.7 - 1.0	< 1.0
Cash Flow to Current Liabilities	>150%	150%-100%	100% - 50%	50% - 0%	< 0%
Debt to Equity	0% - 10%	10%-35%	35%-65%	65%-95%	> 95% or < 0%
Total Margin	> 12%	12% - 8.5%	8.5% - 5.5%	5.5% - 0%	< 0%

**Capital Requirements and Funding:**

The applicant indicates on Schedule 2 capital projects totaling \$10,625,409, which includes this project only. The applicant indicates on Schedule 3 of its application that funding for the project will be provided by cash on hand (\$657,877) and non-related company financing (\$9,967,532). The applicant provided a letter of interest, dated 12/18/2023, from Greystone stating their interest in providing Okeechobee SNF Operations, LLC with funding up to \$11,000,000 to construct the project, but this is not a letter of commitment. Given that the funding is supported by a letter of interest, we have no basis to conclude that funding will be available for this project.

**Conclusion:**

Funding for this project is not guaranteed.

**d. What is the immediate and long-term financial feasibility of the proposal? Section 408.035(6), Florida Statutes**

The immediate and long-term financial feasibility of the project is tied to expected profitability. The purpose of our analysis for this section is to evaluate the reasonableness of the applicant’s profitability projections and, ultimately, whether profitability is achievable for this project. Our analysis includes an evaluation of net revenue per patient day (NRPD), cost per patient day (CPD), nurse staffing ratios, and profitability. We compared the NRPD, CPD, and profitability to actual operating results from skilled nursing facilities as reported on Medicaid cost reports (2020 and 2021 cost report years). For our comparison group, we selected skilled nursing facilities with similar Medicaid utilizations to the utilization projected by the applicant on a per patient day basis (PPD). Comparison group data was adjusted for inflation to match the second-year projection (inflation factor was based on the New CMS Market Basket Price Index as published in the 1st Quarter 2023, Health Care Cost Review).

NRPD, CPD, and profitability or operating margin that fall within the group range are considered reasonable projections. Below is the result of our analysis.

	PROJECTIONS PER APPLICANT		COMPARATIVE GROUP VALUES PPD		
	Total	PPD	Highest	Median	Lowest
Net Revenues	31,012,617	412	680	414	329
Total Expenses	29,056,633	386	682	421	339
Operating Income	1,955,984	26	74	-5	-103
Operating Margin	6.31%		<b>Comparative Group Values</b>		
	Days	Percent	Highest	Median	Lowest
Occupancy	75,293	38.69%	95.6%	82.3%	42.1%
Medicaid	49,745	66.07%	90.5%	67.5%	59.9%
Medicare	20,480	27.20%	24.5%	11.9%	1.9%

**Staffing:**

Section 400.23(3)(b)(1), Florida Statutes, specifies a minimum certified nursing assistant staffing of 2.0 hours of direct care per resident per day, a minimum licensed nursing staffing of 1.0 hour of direct resident care per resident day, and 3.6 hours of total direct care staffing. Based on the information provided in Schedule 6, the applicant’s projected staffing meets this requirement.

The projected NRPD, CPD, and profit fall within the group range and are considered reasonable. In addition, the total cost appears to include at least the minimum amount of staffing required. Therefore, the overall profitability appears achievable.

**Conclusion:**

This project appears to be financially feasible based on the projections provided by the applicant.

**e. Will the proposed project foster competition to promote quality and cost-effectiveness? Section 408.035 (5) and (7), Florida Statutes.**

Strictly from a financial perspective, the type of competition that would result in increased efficiencies, service, and quality is limited in health care. Cost-effectiveness through competition is typically achieved via a combination of competitive pricing that forces more efficient costs to remain profitable and offering higher quality and additional services to attract patients from competitors. With the revenue stream essentially fixed on a per patient basis, the available margin to increase quality and offer additional services is limited. The existing health care system's barrier to price-based competition via a fixed price payer limits any significant gains in cost-effectiveness and quality that would be generated from competition.

**Conclusion:**

This project is not likely to have a material impact on competition to promote quality and cost-effectiveness.

**f. Are the proposed costs and methods of construction reasonable? Do they comply with statutory and rule requirements? ss. 408.035 (8), Florida Statutes; Ch. 59A-4, Florida Administrative Code.**

The applicant has submitted all information and documentation necessary to demonstrate compliance with the architectural review criteria. The cost estimate for the proposed project provided in Schedule 9, Table A and the project completion forecast provided in Schedule 10 appear to be reasonable. A review of the architectural plans, narratives and other supporting documents did not reveal any deficiencies that are likely to have significant impact on either construction costs or the proposed completion schedule. The applicable codes will need to be updated to reflect recent changes, but those changes will not have any effect on the schematic design submitted with this application. The proposed project will decompress existing semi-private rooms and four-bed resident rooms benefiting residents in both addition and the existing renovated areas.

The plans submitted with this application were schematic in detail with the expectation that they will be necessarily revised and refined prior to being submitted for full plan review. The architectural review of this application shall not be construed as an in-depth effort to determine complete compliance with all applicable codes and standards. The final responsibility for facility compliance ultimately rests with the applicant owner. Approval from the Agency for Health Care Administration's Office of Plans and Construction is required before the commencement of any construction.

**g. Does the applicant have a history of and propose the provision of health services to Medicaid patients and the medically indigent? Does the applicant propose to provide health services to Medicaid patients and the medically indigent? Section 408.035(9), Florida Statutes**

Okeechobee SNF cites the facility's history of serving low-income residents and Medicaid recipients and provides data comparing the facility to District 9 and Florida, which confirms it has consistently served a larger percentage of Medicaid eligible residents.

Okeechobee SNF presents the facility's most recent five July 1- June 30, 12-month period ending June 30, 2023, showing the facility high for Medicaid was 79.95 percent in the 12 months ending June 30, 2022. During the 12 months ending June 30, 2023, the facility provided 72.83 percent of its total patient days to Medicaid patients.

The applicant indicates that all beds will be both Medicare and Medicaid certified to maintain access, regardless of payer source. Schedule 7 for the 15-bed project shows no Medicaid/Medicaid HMO residents in year one (ending June 30, 2027) but Medicaid HMO is projected at 1,416 patient days (30.0 percent of the project's total) in year two (ending June 30, 2028). Medicaid/Medicaid HMO represents 49,835 (68.48 percent) of the facility's total year one and 49,745 (66.07 percent) of year two's annual patient days.

**F. SUMMARY**

**Okeechobee SNF Operations, LLC d/b/a Okeechobee Health Care Facility (CON application #10754)** proposes to add 15 community nursing home beds to the existing 210 community nursing home bed facility in Subdistrict 9-3 (Okeechobee County).



The project involves 22,100 GSF of new construction with a cost of \$7,735,000. Total project cost is \$10,625,409.

Okeechobee SNF expects issuance of license in June of 2026 and initiation of service in July of 2026.

The applicant does not propose any conditions on the project.

**Need/Access:**

- The application is in response to the 15-bed FNP
- The applicant addresses Population Demographics & Dynamics citing SD 9-3's high occupancy supports additional beds be added to accommodate demand and ensure residents have access to skilled nursing care without having to travel out of the county
- Demand for skilled care in SD 9-3 is limited which results in more residents relying on the nursing home for care
- Specific patient/resident services planned for the project are consistent with the most commonly occurring Okeechobee residents CY 2022 MDC hospital discharges to SNFs

**Quality of Care:**

- The applicant described in detail its ability to provide quality care
- During the 36 months ending December 20, 2023, Okeechobee Health Care Facility had no and Ventura Services' affiliated nursing homes 24 substantiated complaints.

**Financial Feasibility/Availability of Funds:**

- Funding for this project is not guaranteed
- The project appears to be financially feasible based on the projections provided by the applicant
- The project is not likely to have a material impact on competition to promote quality and cost-effectiveness

**Medicaid/Indigent Care**

- The 15-bed project will not serve Medicaid and Medicaid HMO residents in year one, but 30.0 percent of year two patient days will be provided to Medicaid HMO residents
- Medicaid/Medicaid HMO is projected to be 68.48 percent of year one's and 66.07 percent of total facility's year two patient days

**Architectural**

- The applicant has submitted all information and documentation necessary to demonstrate compliance with the architectural review criteria.
- The cost estimate for the proposed project provided in Schedule 9, Table A and the project completion forecast provided in Schedule 10 appear to be reasonable.
- A review of the architectural plans, narratives and other supporting documents did not reveal any deficiencies that are likely to have a significant impact on construction costs or completion schedule.
- The proposed project will decompress existing semi-private rooms and four-bed resident rooms benefiting residents in both addition and the existing renovated areas.

**G. RECOMMENDATION**

Approve CON #10754 to add 15 community nursing home beds in District 9, Subdistrict 3, Okeechobee County. The total project cost is \$10,625,409. The project involves 22,100 GSF of new construction and a total construction cost of \$7,735,000.

**AUTHORIZATION FOR AGENCY ACTION**

Authorized representatives of the Agency for Health Care Administration adopted the recommendation contained herein and released the State Agency Action Report.

DATE: February 9, 2024

*James B. McLemore*

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