

January 3rd, 2017

Alexandria Hicks
The Certificate of Need Coordinator
Department of Health and Social Services
Division of Health Care Services
Office of Rate Review
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Anchorage, AK 99503-5924
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Dear Ms. Hicks,

Pursuant to 7 AAC 07.080, this letter is to serve as an official notice for a request for an Administrative Hearing.

Based upon 7 AAC 07.072 "The department will publish notice of that decision in at least one newspaper of general circulation in the State and on the Alaska online public notice system." This request is made within the required time-frame.

The following bullet points outline our basis for this request. Maple Springs will present additional information in future correspondence regarding each of these bullet points.

1) General Review Standard #2: Relationship to Applicable Plans

- a. Maple Springs provides a continuum of care model that augments Skilled Nursing services and incorporates the delivery of those services with Regional health plans for the Matsu Valley.

2) General Review Standard #3: Stakeholder Participation

- a. Maple Springs has spent a significant amount of time collaborating with parties to determine the best course of action for this project. Maple Springs has ensured that the physicians, healthcare providers, Alaskan Native community and the community at large has been involved with this process.
- b. Maple Springs included in the original CON application a Hospice House to reflect the desire of the Stakeholders. This service can only be delivered through licensed Skilled Nursing beds through a CON process.

3) General Review Standard #4: Alternative Methods Assessed

- a. Maple Springs proposed services are the most suitable approach. Maple Springs analyzed a stand-alone, single service building for delivering these services to Matsu Valley. However, between the feedback received and our experience we have determined the proposed model to be the very best suited for Matsu Valley.
- b. Reduces cost to Medicaid, residents and their families by properly placing residents in appropriate care settings due to residing in a Continuing Care Retirement Community model. This best supports the Skilled Nursing Services that Maple Springs is applying for.

4) General Review Standard #5: Impact on Existing System

- a. Maple Springs provides tremendous benefits to the hospital system in the Matsu Valley by providing additional placement options and placing residents in appropriate care settings. This access to options for the Matsu residents will help alleviate the existing burden on the hospital beds and future burden on Skilled Nursing beds the Matsu Healthcare system is experiencing and will experience without additional options.
- b. Maple Springs supplements the hospital and the outpatient Hospices services the Matsu Valley by providing a Hospice House.
- c. Even though the cost of the proposals is not a consideration in CON decisions we would like to note the significant savings to the Medicaid system that Maple Springs will offer after the 134 beds are constructed.

5) General Review Standard #6: Access

- a. The two most populated areas of the Matsu Valley are directly around the city centers of Wasilla and Palmer. The original locations proposed by Maple Springs provide superior access to Skilled Nursing services for the vast majority of Matsu Valley residents, most importantly the senior/elder citizens and their adult children.
- b. By providing two buildings in Matsu Valley, Maple Springs is able to provide additional opportunities for employment for a greater number of Matsu Valley residents. This will allow Maple Springs to be a valuable partner with other providers in the development of the healthcare employment talent that is needed.
- c. Maple Springs is the only applicant to propose a Hospice House. Without approval of this application the access to quality in-patient Hospice services will be greatly diminished.

6) Additional Considerations:

- a. Maple Springs is the only entity between applicants to have built a Skilled Nursing Facility from the ground up.



MAPLE Springs OF ALASKA

- b. Within the Maple Springs company there is vast experience from opening new Skilled Nursing Facilities to operating existing facilities. This includes both the principals operating experience as well as employees and partners of Maple Springs.
- c. Maple Springs was the only applicant to submit certified cost estimates by a licensed Alaskan contractor.
- d. Licensed Alaskan contractors have intricate knowledge of building in the harsh Alaskan Climate. Maple Springs is the only applicant to provide a licensed Alaskan contractor to construct the projects for the residents of the Matsu Valley. This quality both from timing and cost analyses cannot be overlooked by the department.

It is the desire of Maple Springs to be able to construct the buildings as outlined in our original application. We believe the proposal and information set forth within that application stands on its own and should be considered as the best solution for Skilled Nursing services in the Matsu Valley.

We appreciate the departments continued assistance throughout this process. If there is additional information required from Maple Springs at this time please let us know.

Sincerely,



Nicholas Larsen
Maple Springs Management