



Please consider Aspen Creek's responses to Request for Additional Information dated 6.24.22:

- 1. Please provide a detailed staffing plan with further explanation how you plan to address "increased staffing ratios, specialized training and additional labor with specialty licensure," as stated in your application, for the proposed skilled nursing facility. In addition, please provide an associated anticipated timeline for recruitment, retention, and on-going staff development and training.**

Aspen Creek's acuity-based staffing model dictates a lower nurse/aide to patient ratio for sub-acute patients than the typical post-acute nursing home resident requires. This means that more trained professionals will be caring for fewer patients, resulting in higher nursing hours per patient day (NHPPD). The attached Appendix 1 includes a sample staffing matrix based on the staffing model for a 38-bed sub-acute unit. The facility will employ the requisite mixture of speech language pathology (ST), respiratory therapy (RT), physical therapy (PT), occupational therapy (OT), registered nurses (RN), licensed practical nurses (LPN), and certified nurse aids (CNA), as indicated on the matrix.

Aspen Creek would employ an aggressive recruitment model of key skilled professionals either within the greater Anchorage market or by bringing professionals on a full-time and/or contract basis to Anchorage from adjacent markets, including the Pacific Northwest. Aspen Creek's leaders have developed pipeline relationships with educational institutions with the sole purpose of supplying the necessary employees with the skilled credentials requisite for this setting. Aspen Creek's startup capital model includes hiring key directors and managers 6 months in advance of accepting patients. The key positions for hire in the sub-acute unit would be an RN unit manager and director of respiratory therapy. These two managers would work closely with the facility director of staff development, director of nursing, assistant director of nursing, and director of rehabilitation therapy services. These personnel would build training modules, purchase supplies and equipment, implement policies and procedures, and prepare for treating patients. Each manager would work together with the facility director of staff development to ensure that staff requiring specialty training are qualified and prepared to care for sub-acute patients. Hiring of support and floor staff would ramp up in sufficient time according to the provided matrix, prior to bringing patients in.

- 2. The department requests assurance that you understand the requirements of the Settings Final Rule and the conditions around which heightened scrutiny may occur, and that you provide a summary of how your current certified HCB setting will remain in compliance with CMS's Settings Final Rule when operating cooperatively with the proposed skilled nursing facility, and how adherence to the regulatory criteria will be met.**



Wow, what an opportunity to share with you what we do at Aspen Creek Senior Living to promote independence, purpose and a belief that nobody is left behind in the State of Alaska. We have reviewed in detail the attached “Exploratory Questions” and the setting requirements found in 42 CFR. As noted, we do accept individuals that are recipients of the HCBS waiver program in the State of Alaska. Currently we have 14 residents that live with us who are recipients of this program and have been honored to have helped them receive these benefits with our local care coordinators. We are well prepared by virtue of how we operate and construct our facilities for the inspection that will take place 12 months following our opening of this new skilled nursing facility. To provide advanced assurance that we are prepared we want to provide the following insights about the location under review in Anchorage:

- We are located on the corner of Dowling and Lake Otis which has easy access to Seward Hwy, down town Anchorage, the Diamond Center and other local retail and community-based services. Our backdrop is residential and we are centered in a highly populated residentially surrounded portion of Anchorage
- We are a family-based operation. Meaning our activities are specifically organized to integrate relationships between our senior citizens and their families. We do this through events, community service, tradition integration, family history education, family dining, and most importantly we invite the family members to participate in providing the experiences with our senior citizens.
- We have an in-house health spa, development center, performing arts center, gym, library, lounges, theatre and a fantastic dining center that provides 5-star meals with selections.
- We have field trips and a bus driver that provides an active involvement with our community for residents who have the physical and mental acuity to participate.
- We integrate religious, educational, veteran, senior, youth, cultural and other community-based programs and organizations with our seniors. These happen in our in-house community and also for those who can travel to the locations where these events are happening.
- We are HIPPA compliant and cyber security systems to protect confidential financial and medical information for our seniors and our staff

We could go on for pages sharing what we do as a licensed assisted living provider that promotes the HCBS programs rules for a quality setting. Our theme when we built this location was “*Carhart in a Tuxedo*”! This expresses what we have found as the true originating character of our seniors in Alaska. We love these seniors, and love the fact that who they are is so much more



important on the inside than what they are trying to present to those they interact with. We believe true Alaskan's live by this motto and we not only embrace it, but we promote it.

Independence, ethics, hard work, prosperity and doing so without telling the world about it! We encourage you to come visit us in person and tour this facility, meet our leadership team and ask specific questions about what we do and how we currently and futuristically will operate in full compliance with the settings rules founded in 42 CFR.

This skilled nursing facility will run independent, but be a huge benefit to our current operations and our ability to improve our current resident's ability to be part of the greater Anchorage Community. In fact, we have a major need in our current facility for us to have the needed beds for people who live with us, and continue to come to us that we cannot provide services too, in a non-skilled HCBS environment.

The convenience of having a sister facility with skilled intelligence to help us deal with medical issues we see every day with our current seniors who are aging in place is desperately needed. Especially for those with advanced mental and behavioral issues who are currently living with us in our memory care. Words cannot express the need that we have for more skilled beds with the services we are suggesting for both short- and long-term stay. Our site plan offers a very clear entrance off of Dowling that segregates these two facilities and directionally will have signage that allows the public and our residents to know where they can go to find what they are looking for at this stage of their life.

We welcome anything that you find or will find in the future that will help us do a better job, be more compliant and most importantly be advanced. We care far more about what is coming down the pipeline with our aging population than what we are seeing today. Technology, licensing changes which promote the abilities of our medical professionals to broaden their service platforms, advancement of telehealth for our seniors needs in remote areas, funding diversity that allows us to evolve how we are creating funds that match the current needs, rather than yesterday's programs that we are trying to deliver services under.

All of these and more are so important for us as we partner with you in this new location.



3. Please provide your most up to date construction timeline, including any revised estimated project start and project end date.

With an anticipated CON approval date of December 31, 2022, we want to provide the following milestones for you to consider for our construction time line:

- Site Grading and drainage plans January 1, 2023 through May 2023
- General site grading for over excavation and pad preparation Summer 2023
- Construction drawings including architectural, mechanical, electrical, structural, plumbing, civil, and landscaping January 1, 2023 through August 2023
- Permitting and general contractor selection August 2023 through March 2024
- Construction of horizontal and vertical improvements March 2024 through September 2025
- Operational set with FF&E, onsite management training, final inspections and completed acceptance for licensing September 2025 through December 2025
- Opening January 2026