

Via Email

Tennessee Department of Health
Office of Health Care Facilities
665 Mainstream Drive
Nashville, TN 37243

Tennessee Health Facilities Commission
665 Mainstream Drive, 2nd Floor
Nashville, TN 37243

Re: Douglas Post-Acute and Rehabilitation Center – Request for Guidance on Reopening as Specialty Care Facility

To whom it may concern:

We write to formally advise that our ownership group currently owns Douglas Post-Acute and Rehabilitation Center, a seventy-two (72) bed skilled nursing facility located in Tennessee, which is presently not in operation and is not currently certified for participation in the Medicare and Medicaid programs. We are requesting to maintain/ reopen the facility license and focus on specialty care.

We have actively evaluated a strategic reopening of the facility to address a critical and growing need within the State of Tennessee for specialized post-acute care services. Specifically, we are considering development of:

- (i) a dedicated Traumatic Brain Injury (TBI) program;
- (ii) a ventilator-dependent (vent) unit; or
- (iii) a hybrid model incorporating both service lines.

Based on our experience operating skilled nursing facilities and our understanding of current discharge challenges across Tennessee hospitals, there appears to be a meaningful shortage of beds capable of serving high-acuity patients, including ventilator-dependent individuals and those requiring specialized neurological rehabilitation. We believe reopening Douglas Post-Acute and Rehabilitation Center and focus on specialty care would help alleviate hospital bottlenecks, reduce out-of-state placements, and expand access to clinically appropriate care within the community.

To that end, we respectfully request guidance from the Department of Health and the Health Facilities Commission regarding the regulatory pathway to accomplish this initiative, including:

- Requirements for re-licensure or reactivation of the facility;
- Process and requirements for Medicare and TennCare (Medicaid) certification;
- Applicability of the Certificate of Need (CON) process for the development of specialty services, including ventilator and/or TBI programs;





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- Any bed classification, specialty designation, or need methodology considerations specific to high-acuity services;
- Physical plant, life safety, and staffing requirements applicable to ventilator and/or TBI populations; and
- Any additional regulatory or policy considerations the State believes are relevant to successfully reopening and operating a specialty facility of this nature.

We are committed to working collaboratively with the State to ensure that this project is aligned with Tennessee's healthcare priorities and is developed in a compliant and high-quality manner. We would welcome the opportunity to meet with the appropriate representatives from your offices to discuss this proposal in greater detail and to better understand the State's current needs and expectations.

Thank you for your time and consideration. We look forward to your guidance and to the opportunity to bring much-needed specialty post-acute services to the residents of Tennessee.

Respectfully,

Matthew Kafka

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