



OUR ISLAND HOME

9 East Creek Road,
Nantucket, Massachusetts 02554

TO: Board of Selectmen

FROM: Rachel Day, Human Services Director
Rachel Day

DATE: December 6, 2016

RE: Bed Configuration Update – New Our Island Home Facility

Following the Board's recent vote to develop the new Our Island Home facility with a configuration of 40 total beds consisting of 30 Skilled Nursing and 10 Assisted Living beds (as recommended), a few concerns and questions were raised as we began to more fully investigate the requirements for this configuration. Specifically, a question arose as to why we would not just apply to change the "level" of some of our current beds under our current licensure, rather than seeking the additional license required for Assisted Living beds. Per the licensing of long-term care facilities regulations (105 CMR 150.000) there are four designated levels of care. Our Island Home is currently licensed for 22 Level II beds and 23 Level III beds. The four Levels are defined as follows:

- Level I (Intensive Nursing and Rehabilitation care Facilities): pertains to a facility or unit that provides continuous skilled nursing care and an organized program of restorative services in addition to basic care. Those who occupy these beds are usually our Medicare residents.
- Level II (Skilled Nursing Facilities): pertain to a facility or unit that provides continuous skilled nursing care and has available restorative and other therapeutic services in addition to basic care.
- Level III (Supportive Nursing Care Facilities): pertains to a facility or unit that provides routine nursing services and may, periodically, have skilled nursing, restorative and other therapeutic services. These are residents whose condition has stabilized such that they only report some nursing care, supervision and observation.
- Level IV (Resident Care Facilities): pertain to a facility or unit that provides for or arranges to provide basic care and support services in a protected living environment. The services are to assist those who have difficulty in caring for themselves but do not require Level II or III nursing care or other routine medically related services.

Operational and transitional challenges that will be mitigated under this modified configuration include:

- The State licensure and certification oversight will remain under one single agency rather than operating within two separate licenses, approvals, regulations, cost reporting and billing requirements.
- A higher reimbursement rate per Level IV bed based on current reimbursement rates.
- A waiver to share the Nursing Home-licensed Administrator for all bed levels rather than a need to have an Administrator with dual licensure (Nursing Home and Assisted Living).
- An attached building structure rather than a separate, unattached structure.

The attached chart shows the regulatory comparison of Assisted Living beds and Level IV beds. It is recommended, based on this additional, subsequent analysis, that the new OIH model be comprised of 10 Level IV beds rather than 10 Assisted Living beds.