

From: [Denise Leonard](#)
To: [Dorge, Alison](#)
Subject: RE: CON Project #6192 DT
Date: Monday, July 7, 2025 11:30:17 AM
Attachments: [image005.png](#)
[image006.png](#)
[image001.png](#)
[Copy of Independence Court Capacity.xlsx](#)

Sorry for the SNF it should be 21 semi-private rooms and 53 private rooms for a total of 95 SNF Beds. Confirming the 71 beds for the RCF as per attached.

Sincerely,

Denise

Denise A. Leonard CPA | Partner | Healthcare | Senior Care Focus

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Plante Moran 1111 Superior Ave. Suite 1250, Cleveland, OH 44114

Direct Dial: 216.274.6514 | Mobile: 440.724.8120 |

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From: Dorge, Alison <Alison.Dorge@health.mo.gov>
Sent: Monday, July 7, 2025 12:10 PM
To: Denise Leonard <denise.leonard@plantemoran.com>
Subject: RE: CON Project #6192 DT

You don't often get email from alison.dorge@health.mo.gov. [Learn why this is important](#)

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Denise,

The application reflects the SNF beds will be decreased to 95 beds; based on your response below I calculate 137 beds: 42 rooms x 2 beds= 84; 53 rooms x 1 bed= 53; 84+53= 137 beds. Please advise.

To confirm the RCF would be: 25 x 2 beds = 50; 2 x 3 beds = 6; 15 x 1 bed = 15 = 71 beds

From: Denise Leonard <denise.leonard@plantemoran.com>
Sent: Monday, July 7, 2025 11:02 AM
To: Dorge, Alison <Alison.Dorge@health.mo.gov>

Subject: RE: CON Project #6192 DT

The SNF will have 53 private rooms and 42 semi-private rooms. The RCF will remain the same with the exception of rooms 702 and 704 which will no longer be resident rooms.

Please let me know if you have any questions or need more detail.

Thanks!

Denise

Denise A. Leonard CPA | Partner | Healthcare | Senior Care Focus

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From: Dorge, Alison <Alison.Dorge@health.mo.gov>

Sent: Monday, July 7, 2025 10:25 AM

To: Denise Leonard <denise.leonard@plantemoran.com>

Subject: CON Project #6192 DT

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Denise,

Can you tell me after project completion how many SNF rooms would be private & semi-private and how many RCF rooms would be private & semi-private? Thanks!



Alison Dorge
Regulatory Compliance Manager
Certificate of Need & Supplemental Health Care Service Agencies
Missouri Department of Health and Senior Services
✉: Alison.Dorge@health.mo.gov | ☎: 573-751-6700 or 573-418-4602

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From: [Denise Leonard](#)
To: [Fick, Mackinzev](#)
Subject: RE: CON 6192 DT responses to questions
Date: Monday, June 16, 2025 4:10:50 PM
Attachments: [image005.png](#)
[image006.png](#)
[image001.png](#)
[Item #2 - IIHS Phasing Plan - Court RFC.pdf](#)
[Item #2 - IHS Phasing Plan - Care Center.pdf](#)
[Item #3 - DIV II Form 4A Existing and Proposed Square footage v2.pdf](#)
[Item #3 - IHS - Proposed Renovation Areas and SF Plan. v2.pdf](#)
[Item #3 - Project Description Narrative-2.pdf](#)
[Item #4 - Schematic DHSS Submission.pdf](#)

Mackinzev,

Please see attached in response to your questions.

1. Representative registration form – **sent earlier today**
2. Provide more detail on each phase and what it entails.
 - a. **See attached phasing plans (items #2) – I showed the actual phasing areas.**
 - b. **The drawings and the write up explain what we are doing, do you need more detail/information?**
3. The application includes both RCF and ALF services, however neither facility provides this type of service. Please advise.
 - a. **See corrected documents these were incorrectly labeled as ALF. I took out incorrect references to ALF and re-labeled RCF**
 - b. **On the LOI – The final two pages should be replaced. See attached to replace the final two pages of the LOI. Let me know if you want me to re-insert them.**
4. Provide documentation that schematics were submitted to DHSS ECU department.
 - a. See attached (item #4) email string that schematics were submitted.
5. On the ALF schematics, I count 43 beds. Please advise.
 - a. **On page 3 of the schematics or on the proposed renovating areas PDF, the green rooms on the three wings on the left side of the page add up to 42 units. The two units colored in yellow (702 and 704) are being converted to an activities area.**

I'm not sure on your process if the attached is acceptable or if you want me to submit an entirely new CON pdf file with the correct attachments. Let me know your preference.

Regards,
Denise

Denise A. Leonard CPA | Partner | Healthcare | Senior Care Focus

Plante Moran 1111 Superior Ave. Suite 1250, Cleveland, OH 44114

Direct Dial: 216.274.6514 | Mobile: 440.724.8120 |

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From: Fick, Mackinze <Mackinze.Fick@health.mo.gov>
Sent: Monday, June 16, 2025 8:07 AM
To: Denise Leonard <denise.leonard@plantemoran.com>
Subject: RE: CON 6192 DT

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Denise,

You do not need to remove this portion. Let me rephrase the question, RCF services are provided at Independence Court, however the application indicates that ALF services will be offered. Are you planning on converting RCF services to ALF? If so, what location will this be at?

Please let me know if you have any additional questions! Thank you.



Mackinze Fick (Last Day in CON will be 6/16)
Assistant Program Coordinator
Certificate of Need Agency :
<http://health.mo.gov/information/boards/certificateofneed/index.php>
Missouri Department of Health and Senior Services
920 Wildwood Drive, Jefferson City, MO. 65102
✉: mackinze.fick@health.mo.gov | ☎: 573-751-6403

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From: Denise Leonard <denise.leonard@plantemoran.com>
Sent: Friday, June 13, 2025 4:37 PM
To: Fick, Mackinze <Mackinze.Fick@health.mo.gov>
Subject: RE: CON 6192 DT

Mackinze

Thank you for providing the below list of additional information required. For your question "The application includes both RCF and ALF services, however neither facility provides this type of service." I am not sure exactly what that means. Do you want us to remove any mention to the RCF and ALF services as we only need to focus on the SNF for the CON?

Appreciate your assistance,
Denise

Denise A. Leonard CPA | Partner | Healthcare | Senior Care Focus

Plante Moran 1111 Superior Ave. Suite 1250, Cleveland, OH 44114

Direct Dial: 216.274.6514 | Mobile: 440.724.8120 |

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From: Fick, Mackinzey <Mackinzey.Fick@health.mo.gov>

Sent: Friday, June 13, 2025 3:42 PM

To: Denise Leonard <denise.leonard@plantemoran.com>

Subject: CON 6192 DT

Importance: High

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Denise,

After review of the application, some additional items are needed.

- Representative registration form for Denise Leonard.
- Provide more detail on each phase and what it entails.
- The application includes both RCF and ALF services, however neither facility provides this type of service. Please advise.
- Provide documentation that schematics were submitted to DHSS ECU department.
- On the ALF schematics, I count 43 beds. Please advise.

This information is needed by June 20, 2025.



Mackinzey Fick (Last Day in CON will be 6/16)

Assistant Program Coordinator
Certificate of Need Agency :

<http://health.mo.gov/information/boards/certificateofneed/index.php>

Missouri Department of Health and Senior Services
920 Wildwood Drive, Jefferson City, MO. 65102

✉: mackinzey.fick@health.mo.gov | ☎: 573-751-6403

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Date: February 2025

Re: Independence Health Systems
Renovation and Addition Project
Section 4 – Project Description Certificate of Need

Project Description Narrative

Independence Health Systems (IHS), located at 800 S. Kingshighway in Perryville, MO, is a fully licensed senior living organization that currently provides skilled nursing, Residential Care Facility (RCF), and rental independent living services to the members of the community. In 2023 and 2024, IHS underwent a strategic master planning process to address various challenges facing the senior living industry and the organization in general. Declining census, changing demographics, rising operating costs, aging facilities, and staffing shortages all were top priorities for IHS to address during this process.

Through extensive research, data analytics, and guidance from industry experts during this strategic master planning process, IHS determined that it would undergo a repositioning and capital improvement project to better position itself to provide high quality senior living services today and into the future.

The project will consist of the following:

Renovation and interior upgrades of the existing skilled nursing wings which will include converting semi-private units to additional private units throughout the facility. The project will consist of interior finish upgrades, mechanical, electrical, and associated furniture upgrades. The project will take place over a two-year period, strategically phased into a total of five phases in order to maintain occupancy. Ultimately, the conversion will end up decreasing the total licensed SNF bed count from 133 to 95.

The various common areas will be upgraded throughout the facility by updating interior finishes, mechanical, electrical infrastructure needs, and associated furniture. In addition to the renovation work, a new 2,100 SF addition will be added to the community to offer additional common and support space to the building.

The existing RCF wings will also undergo renovation at a similar time.

Please reference the below timeline and attached area of work plans provided in conjunction with this narrative.



"We Raise the Bar for Quality Living"

Independence Health System, Inc.

Timeline				Beds Offline	Beds Online	Project Occupancy	Project Occupancy %
	Start	End	Duration (Months)				
Full Design & Financing							
Design	Ongoing	7/1/2025	NA				
Expediated CON approval process	2/1/2025	8/1/2025	6				
Permitting, Procurement, Financing	7/1/2025	9/1/2025	2				
Phase 1a. RCF / RCF & Memory Care							
500 Wing	9/1/2025	2/1/2026	5				
600 Wing	2/1/2026	7/1/2026	5				
700 Wing (Memory Care)	7/1/2026	12/1/2026	5				
Memory Care Lease Up	12/1/2026	6/1/2027	6				
Phase 1b. Skilled Nursing				0	133	90.8	68%
Move Residents / Ramp Down	5/1/2025	9/1/2025	4	44	90	89.8	100%
SNF Phase 1	9/1/2025	2/1/2026	5				
Move Residents / Ramp Down	1/1/2026	3/1/2026	2	30	96	89.8	94%
SNF Phase 2	3/1/2026	8/1/2026	5				
Move Residents / Ramp Down	7/1/2026	9/1/2026	2	28	90	89.8	100%
SNF Phase 3	9/1/2026	2/1/2027	5				
Move Residents / Ramp Down	1/1/2027	3/1/2027	2	16	95	89.8	95%
SNF Phase 4	3/1/2027	8/1/2027	5				
Move Residents / Ramp Up	4/1/2027	8/1/2027	4	16	87	87.0	100%
SNF Phase 5	8/1/2027	1/1/2028	5				
Move Residents / Ramp Up	2/1/2028	12/1/2028	10	0	95	90.8	0%

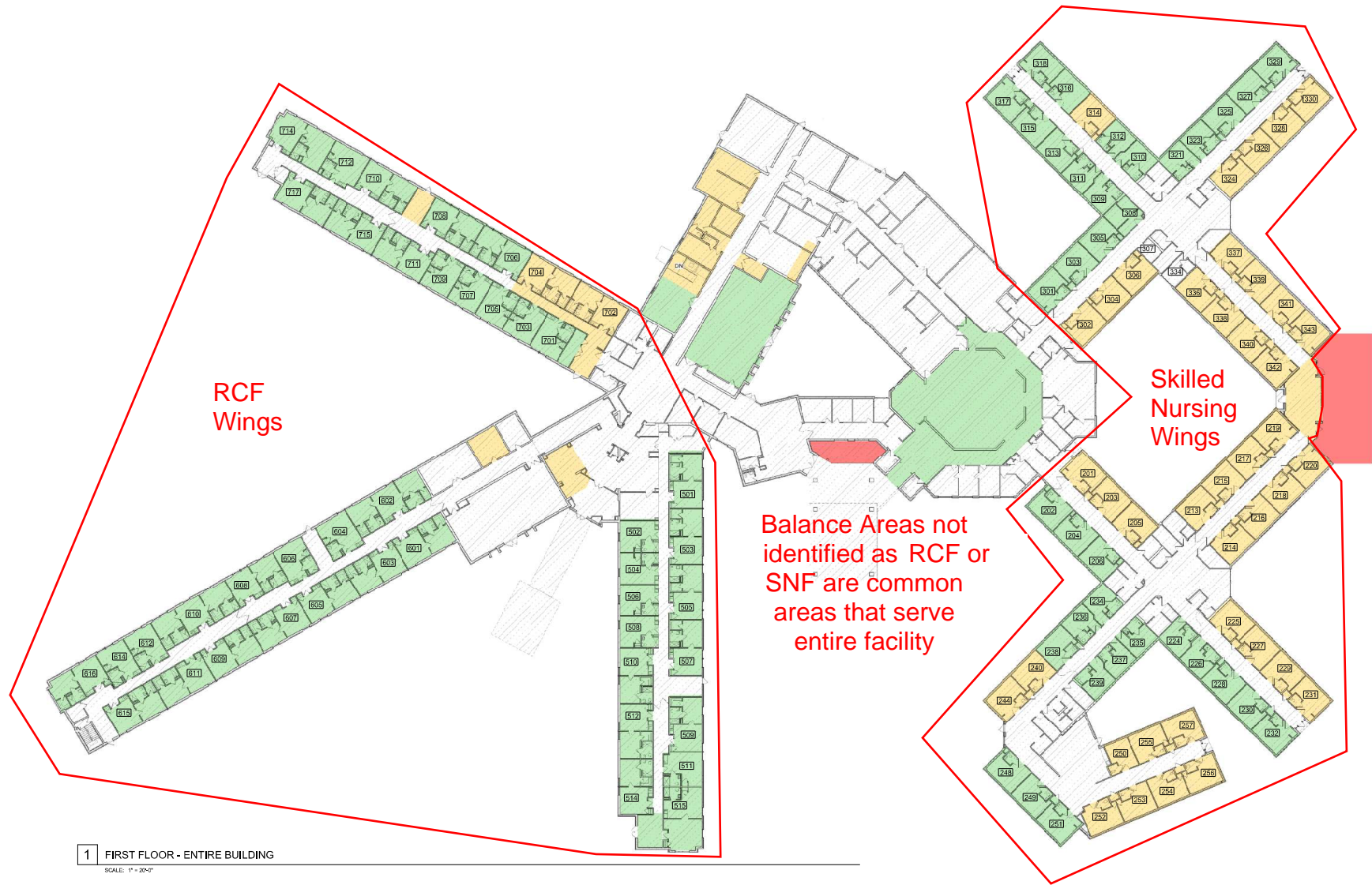


Certificate of Need Program

REPRESENTATIVE REGISTRATION

(A registration form must be completed for **each** project presented.)

Project Name Independence Care Center of Perry County & Independence Court		Number #6192 DT.
(Please type or print legibly.)		
Name of Representative Denise Leonard		Title Partner
Firm/Corporation/Association of Representative (may be different from below, e.g., law firm, consultant, other) Plante Moran		Telephone Number 216.274.6514
Address (Street/City/State/Zip Code) 1111 Superior Avenue, Cleveland, Ohio 441114		
Who's interests are being represented? (If more than one, submit a separate Representative Registration Form for each.)		
Name of Individual/Agency/Corporation/Organization being Represented Independence Health Systems, Inc.		Telephone Number 573-547-6546
Address (Street/City/State/Zip Code) 800 South Kingshighway, Perryville, MO 63775		
<div>Check one. Do you: <input type="checkbox"/> Support <input type="checkbox"/> Oppose <input checked="" type="checkbox"/> Neutral</div> <div>Relationship to Project: <input type="checkbox"/> None <input type="checkbox"/> Employee <input type="checkbox"/> Legal Counsel <input checked="" type="checkbox"/> Consultant <input type="checkbox"/> Lobbyist <input type="checkbox"/> Other (explain):</div> <div>Other Information: _____ _____</div> <div>_____ _____</div> <p>I attest that to the best of my belief and knowledge the testimony and information presented by me is truthful, represents factual information, and is in compliance with §197.326.1 RSMo which says: <i>Any person who is paid either as part of his normal employment or as a lobbyist to support or oppose any project before the health facilities review committee shall register as a lobbyist pursuant to chapter 105 RSMo, and shall also register with the staff of the health facilities review committee for every project in which such person has an interest and indicate whether such person supports or opposes the named project. The registration shall also include the names and addresses of any person, firm, corporation or association that the person registering represents in relation to the named project. Any person violating the provisions of this subsection shall be subject to the penalties specified in §105.478, RSMo.</i></p>		
Original Signature <i>Denise A Leonard</i>		Date 6/16/2025



1 FIRST FLOOR - ENTIRE BUILDING
SCALE: 1" = 20'-0"

ALTERATION SUMMARY

DESCRIPTION	AREA	REDC ALTERATION LEVEL	NOTE
EXISTING TOTAL GROSS AREA	87,408 SF		
AREA OF FINISHED FUTURE EQUIPMENT REPLACEMENT	33,946 SF	LEVEL 1	NO AREA LIMIT ON LEVEL 1 ALTERATIONS
AREA OF SPACE RECONFIGURATION ALTERATIONS "WORK AREA"	16,375 SF	LEVEL 2 (17% OF TOTAL AREA)	BELOW 50% THRESHOLD OF LEVEL 3 ALTERATION, COMPLY WITH CHAPTER 8 & 9 REDC
ADDITIONS	7,080 SF	PRESCRIPTIVE, COMPLY WITH IRC	NEW CONSTRUCTION WILL MEET 2021 IRC

*PER REDC DEFINITIONS CHAPTER 2, WORK AREA CONSISTS OF ALL "RECONFIGURED" SPACE



5817 DELMAR BOULEVARD
SAINT LOUIS, MISSOURI 63112
PHONE 314.863.1513
FAX 314.863.1383
info@daa.com

SCHEMATIC DESIGN - NOT FOR CONSTRUCTION

RENOVATIONS AND ADDITIONS FOR

INDEPENDENCE HEALTH SYSTEMS

800 S KINGSHIGHWAY, PERRYVILLE, MO 63775

No.	Description	Date

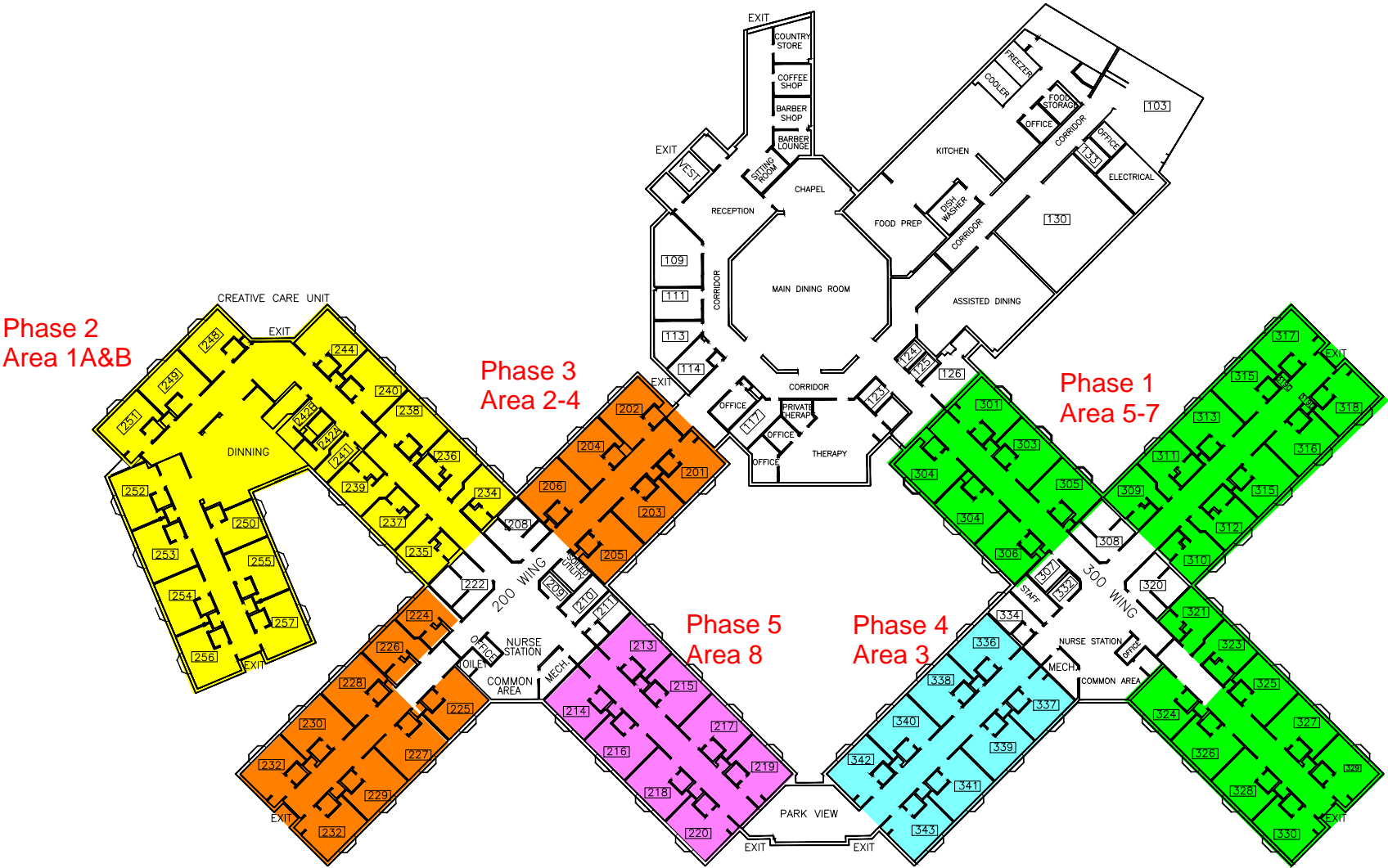
ALTERATION PLAN

Project number: 2024033
Date: Jan 10 2025

A003

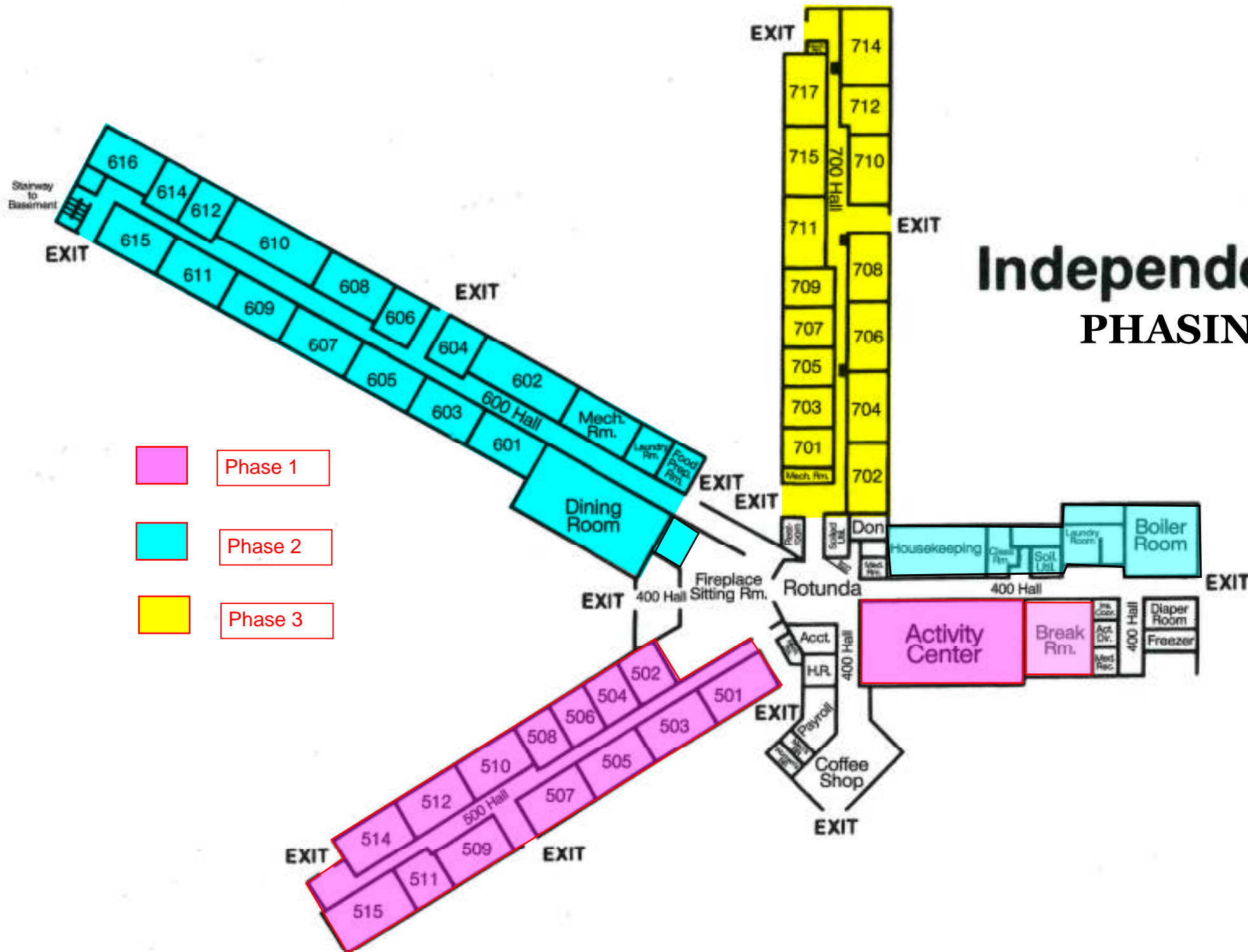
INDEPENDENCE CARE CENTER

Phasing Plan



Independence Court

PHASING PLAN



Divider II – Proposal Description
Item #4

Summary of existed and proposed square footage:

ALTERATION SUMMARY			
DESCRIPTION	AREA	IEBC ALTERATION LEVEL	NOTE
EXISTING TOTAL GROSS AREA	97,406 SF		
AREA OF FINISHES/FIXTURE/EQUIPMENT REPLACEMENT	33,966 SF	LEVEL 1	NO AREA LIMIT ON LEVEL 1 ALTERATIONS
AREA OF SPACE RECONFIGURATION ALTERATIONS "WORK AREA"	16,275 SF	LEVEL 2 (17% OF TOTAL AREA)	BELOW 50% THRESHOLD OF LEVEL 3 ALTERATION, COMPLY WITH CHAPTER 8 & 9 IEBC
ADDITIONS	2,060 SF	PRESCRIPTIVE. COMPLY WITH IBC	NEW CONSTRUCTION WILL MEET 2021 IBC
*PER IEBC DEFINITIONS CHAPTER 2, WORK AREA CONSISTS OF ALL "RECONFIGURED" SPACE			

- Total Building SF – 97,406
- RCF , Skilled Nursing, and Common Area Cosmetic Upgrades – 33,966 SF
- RCF , Skilled Nursing, and Common Area Renovations – 16,275 SF
- New Skilled Nursing Common Area Addition – 2,060 SF

From: Bradley Chronister
Sent: Tuesday, January 14, 2025 6:33:29 PM
To: Schaumburg, Carrie <Carrie.Schaumburg@health.mo.gov>; East, David <David.East@health.mo.gov>
Subject: RE: DHSS Regulations - Phased Renovation Project

Hello Carrie and David,

I'm following up with additional information on the project below. We recently completed a schematic design set for the AL/SNF renovation which can be accessed at the link below:

Independence Health - Renovation Schematic 20250110.pdf

I am contacting you to request a preliminary review of the planned renovations so that we can address any feedback in subsequent design phases. Please let me know if you are unable to access the files or when you would be available to discuss them.

Thanks.



Brad Chronister

AIA, PE

(314) 863-1313 ext. 304

www.stlda.com

From: Schaumburg, Carrie <Carrie.Schaumburg@health.mo.gov>
Sent: Tuesday, October 29, 2024 9:32 AM
To: Bradley Chronister <bradleychronister@STLDA.COM>; East, David <David.East@health.mo.gov>
Subject: RE: DHSS Regulations - Phased Renovation Project

Correct. We will not have to see the Independent Living as long as SNF or RCF residents are not required to go there for any reason (physical therapy, dining, etc).

We will determine construction inspections when we review the drawings. ECU does not complete 100% licensure inspections so those will have to be coordinated with the Licensure Unit 30-45 days prior to resident occupancy for each phase. The Region or State Fire Marshal may determine that they do not need to complete an onsite for each phase depending on the work completed on that phase.

When you are ready to send us drawings, please let me know and I will send you information on where to mail them. We typically require 1 printed set of construction drawings and a CD or thumb drive containing PDFs of the drawings and the specifications (do not send printed specs). We have no preference on seal (wet, digital, etc) as long as drawings are signed and sealed. We are able to complete a preliminary review at any time if you would like to do that as well.

Thank you,



Carrie Schaumburg | Architect

Missouri Department of Health and Senior Services

Engineering Consultation Unit

P.O. Box 570, Jefferson City, MO 65102-0570

573-526-5350 | Carrie.Schaumburg@health.mo.gov

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<https://health.mo.gov/safety/abuse/>

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From: Bradley Chronister <bradleychronister@STLDA.COM>

Sent: Tuesday, October 29, 2024 9:18 AM

To: Schaumburg, Carrie <Carrie.Schaumburg@health.mo.gov>; East, David <David.East@health.mo.gov>

Subject: RE: DHSS Regulations - Phased Renovation Project

Hi Carrie,

I spoke to the CON office and they confirmed what I needed there – thanks.

I received your voicemail and tried to call back a couple times, so thought it might just be easier to email. We'll be completing renovations on both the Independence Court and Independence Care Center. There will be (2) simultaneous phased renovations which we plan to submit to your office as a single set of construction documents. Residents will be relocated within the same licensed area, spaces renovated, then moved back into to the renovated spaces.

How do you typically evaluate this type of renovation process? Any special administrative or ECU inspection considerations we need to account for due to the phasing?

Also, there will be a separate Independent Living facility constructed onsite and operated by the same entity. There will be no ALF/RCF/SNF beds in this new construction and it's our understanding that DHSS does not review anything concerning IL. Please confirm.

Thanks.



Brad Chronister

AIA, PE

(314) 863-1313 ext. 304

www.stlda.com

From: Schaumburg, Carrie <Carrie.Schaumburg@health.mo.gov>

Sent: Thursday, October 24, 2024 2:06 PM

To: Bradley Chronister <bradleychronister@STLDA.COM>; East, David <David.East@health.mo.gov>

Subject: RE: DHSS Regulations - Phased Renovation Project

Mr. Chronister,

For CON purposes, you may contact the Certificate of Need directly:

Contact

Missouri Certificate of Need Program

Email: CONP@health.mo.gov

Telephone: 573-751-6403

Fax: 573-751-7894

P.O. Box 570,
Jefferson City, MO 65102

CON Program Office location:
920 Wildwood Drive
Jefferson City, MO 65109

For review, you will be in contact with myself and David East. DHSS does not issue permits, only licensure Permits would be issued by local or county planning, if one exists.

All proposed renovation work will have to be reviewed with us (ECU) prior to construction. Requirements will depend on if you are completing renovations on the licensed residential care facility (Independence Court) or the certified skilled nursing facility (Independence Care Center of Perry County).

You may contact either of us at any time during the process. David's phone number is 573-523-8521.

Thank you,



Carrie Schaumburg | Architect
Missouri Department of Health and Senior Services
Engineering Consultation Unit
P.O. Box 570, Jefferson City, MO 65102-0570
573-526-5350 | Carrie.Schaumburg@health.mo.gov

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<https://health.mo.gov/safety/abuse/>

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From: Bradley Chronister <bradleychronister@STLDA.COM>

Sent: Thursday, October 24, 2024 1:49 PM

To: Schaumburg, Carrie <Carrie.Schaumburg@health.mo.gov>; East, David <David.East@health.mo.gov>

Subject: DHSS Regulations - Phased Renovation Project

Hello,

Our office is in the early design stages of what will be an extensive renovation project at Independence Health in Perryville. We had some questions regarding review, permitting and CON requirements for a multi-phase renovations. Please give me a call at the number below at your earliest convenience.

Thank you.



Brad Chronister

AIA, PE

(314) 863-1313 ext. 304

www.stlda.com

From: [Denise Leonard](#)
To: [Fick, Mackinzey](#)
Subject: RE: CON 6192 DT responses to questions
Date: Thursday, June 19, 2025 3:43:18 PM
Attachments: [image006.png](#)
[image007.png](#)
[image008.png](#)
[image002.png](#)
[Independence Court Capacity.xlsx](#)

I believe the attached better explains the movement in bed licenses as part of the project renovation. The plan would be to have in service going from 75 to 71 beds since we're taking out two "apartments" in rooms 702-704 to create a small dining/activity area. Please let me know if you have any questions.

Sincerely,
Denise

Upcoming time off July 2nd thru July 4th

Denise A. Leonard CPA | Partner | Healthcare | Senior Care Focus

Plante Moran 1111 Superior Ave. Suite 1250, Cleveland, OH 44114

Direct Dial: 216.274.6514 | Mobile: 440.724.8120 |

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From: Fick, Mackinzey <Mackinzey.Fick@health.mo.gov>
Sent: Tuesday, June 17, 2025 9:10 AM
To: Denise Leonard <denise.leonard@plantemoran.com>
Subject: RE: CON 6192 DT responses to questions

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Denise,

Independence Court is licensed for 75 beds, however the schematics only reflect 42. Where are the other beds located? Provide schematics of these rooms as well.

Thank you!

Mackinzey Fick (Last Day in CON will be 6/16)

Unit	Original Use	Original Capacity	New Use	New Capacity
501	RCF Resident		2 RCF Resident	2
502	RCF Resident		1 RCF Resident	1
503	RCF Resident		2 RCF Resident	2
504	RCF Resident		1 RCF Resident	1
505	RCF Resident		2 RCF Resident	2
506	RCF Resident		1 RCF Resident	1
507	RCF Resident		2 RCF Resident	2
508	RCF Resident		1 RCF Resident	1
509	RCF Resident		2 RCF Resident	2
510	RCF Resident		2 RCF Resident	2
511	RCF Resident		1 RCF Resident	1
512	RCF Resident		2 RCF Resident	2
514	RCF Resident		2 RCF Resident	2
515	RCF Resident		2 RCF Resident	2
601	RCF Resident		2 RCF Resident	2
602	RCF Resident		3 RCF Resident	3
603	RCF Resident		2 RCF Resident	2
604	RCF Resident		1 RCF Resident	1
605	RCF Resident		2 RCF Resident	2
606	RCF Resident		1 RCF Resident	1
607	RCF Resident		2 RCF Resident	2
608	RCF Resident		2 RCF Resident	2
609	RCF Resident		2 RCF Resident	2
610	RCF Resident		3 RCF Resident	3
611	RCF Resident		2 RCF Resident	2
612	RCF Resident		1 RCF Resident	1
614	RCF Resident		1 RCF Resident	1
615	RCF Resident		2 RCF Resident	2
616	RCF Resident		2 RCF Resident	2
701	RCF Resident		1 MC RCF Resident	1
702	RCF Resident		2 Activity Room	0
703	RCF Resident		1 MC RCF Resident	1
704	RCF Resident		2 Activity Room	0
705	RCF Resident		1 MC RCF Resident	1
706	RCF Resident		2 MC RCF Resident	2
707	RCF Resident		1 MC RCF Resident	1
708	RCF Resident		2 MC RCF Resident	2
709	RCF Resident		1 MC RCF Resident	1
710	RCF Resident		2 MC RCF Resident	2
711	RCF Resident		2 MC RCF Resident	2
712	RCF Resident		1 MC RCF Resident	1
714	RCF Resident		2 MC RCF Resident	2

715 RCF Resident	2 MC RCF Resident	2
717 RCF Resident	2 MC RCF Resident	2
	75	71