



6/24/2025

Missouri Certificate of Need Program  
Attn: Alison Dorge  
P.O. Box 570  
Jefferson City, MO 65102

Missouri Certificate of Need Board,

Please accept this letter of opposition to Certificate of Need application presented by Black River Skilled Nursing on May 2, 2025. I am directly affected by this proposal.

Simply put, the CON process and guidelines exist to determine a true existing need for additional licensed beds. The calculations included in this application do not support the established CON criteria. The data from Poplar Bluff facilities demonstrates an excess of available skilled nursing beds, not a deficit.

The five skilled nursing facilities in Butler County sometimes face unique challenges to achieve the average 61.2% occupancy reported for the fourth quarter of 2024. Often these facilities are admitting residents from outside of the Poplar Bluff region due to decreased population in Butler County rather than the data presented by Black River Skilled Nursing for projected population growth.

The economic impact for Butler County may look appealing. However, Mr. Ben Sells stated in his open presentation of the project at Three Rivers College, staffing challenges would be handled by a recruiter based in Canada to bring foreign licensed professionals to the area. How can this be economically beneficial to the residents of Butler County?

I urge you to uphold the standards established by the Certificate of Need Committee on behalf of the residents of Butler County. Please vote in opposition or elect to not vote in this matter.

Respectfully,

6/24/2025

Missouri Certificate of Need Program  
Attn: Alison Dorge  
P.O. Box 570  
Jefferson City, MO 65102

Missouri Certificate of Need Board,

Please accept this letter of opposition to Certificate of Need application presented by Black River Skilled Nursing on May 2, 2025. I am directly affected by this proposal.

Simply put, the CON process and guidelines exist to determine a true existing need for additional licensed beds. The calculations included in this application do not support the established CON criteria. The data from Poplar Bluff facilities demonstrates an excess of available skilled nursing beds, not a deficit.

The five skilled nursing facilities in Butler County sometimes face unique challenges to achieve the average 61.2% occupancy reported for the fourth quarter of 2024. Often these facilities are admitting residents from outside of the Poplar Bluff region due to decreased population in Butler County rather than the data presented by Black River Skilled Nursing for projected population growth.

The economic impact for Butler County may look appealing. However, Mr. Ben Sells stated in his open presentation of the project at Three Rivers College, staffing challenges would be handled by a recruiter based in Canada to bring foreign licensed professionals to the area. How can this be economically beneficial to the residents of Butler County?

I urge you to uphold the standards established by the Certificate of Need Committee on behalf of the residents of Butler County. Please vote in opposition or elect to not vote in this matter.

Respectfully,

*Kasey Clark, RN*

6/24/2025

Missouri Certificate of Need Program  
Attn: Alison Dorge  
P.O. Box 570  
Jefferson City, MO 65102

Missouri Certificate of Need Board,

Please accept this letter of opposition to Certificate of Need application presented by Black River Skilled Nursing on May 2, 2025. I am directly affected by this proposal.

Simply put, the CON process and guidelines exist to determine a true existing need for additional licensed beds. The calculations included in this application do not support the established CON criteria. The data from Poplar Bluff facilities demonstrates an excess of available skilled nursing beds, not a deficit.

The five skilled nursing facilities in Butler County sometimes face unique challenges to achieve the average 61.2% occupancy reported for the fourth quarter of 2024. Often these facilities are admitting residents from outside of the Poplar Bluff region due to decreased population in Butler County rather than the data presented by Black River Skilled Nursing for projected population growth.

The economic impact for Butler County may look appealing. However, Mr. Ben Sells stated in his open presentation of the project at Three Rivers College, staffing challenges would be handled by a recruiter based in Canada to bring foreign licensed professionals to the area. How can this be economically beneficial to the residents of Butler County?

I urge you to uphold the standards established by the Certificate of Need Committee on behalf of the residents of Butler County. Please vote in opposition or elect to not vote in this matter.

Respectfully,

Shea L Dixon,  
HR/AP

6/24/2025

Missouri Certificate of Need Program  
Attn: Alison Dorge  
P.O. Box 570  
Jefferson City, MO 65102

Missouri Certificate of Need Board,

Please accept this letter of opposition to Certificate of Need application presented by Black River Skilled Nursing on May 2, 2025. I am directly affected by this proposal.

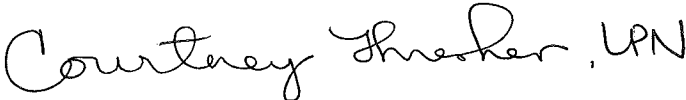
Simply put, the CON process and guidelines exist to determine a true existing need for additional licensed beds. The calculations included in this application do not support the established CON criteria. The data from Poplar Bluff facilities demonstrates an excess of available skilled nursing beds, not a deficit.

The five skilled nursing facilities in Butler County sometimes face unique challenges to achieve the average 61.2% occupancy reported for the fourth quarter of 2024. Often these facilities are admitting residents from outside of the Poplar Bluff region due to decreased population in Butler County rather than the data presented by Black River Skilled Nursing for projected population growth.

The economic impact for Butler County may look appealing. However, Mr. Ben Sells stated in his open presentation of the project at Three Rivers College, staffing challenges would be handled by a recruiter based in Canada to bring foreign licensed professionals to the area. How can this be economically beneficial to the residents of Butler County?

I urge you to uphold the standards established by the Certificate of Need Committee on behalf of the residents of Butler County. Please vote in opposition or elect to not vote in this matter.

Respectfully,

 Courtney Thresher, LPN

6/24/2025

Missouri Certificate of Need Program  
Attn: Alison Dorge  
P.O. Box 570  
Jefferson City, MO 65102

Missouri Certificate of Need Board,

Please accept this letter of opposition to Certificate of Need application presented by Black River Skilled Nursing on May 2, 2025. I am directly affected by this proposal.

Simply put, the CON process and guidelines exist to determine a true existing need for additional licensed beds. The calculations included in this application do not support the established CON criteria. The data from Poplar Bluff facilities demonstrates an excess of available skilled nursing beds, not a deficit.

The five skilled nursing facilities in Butler County sometimes face unique challenges to achieve the average 61.2% occupancy reported for the fourth quarter of 2024. Often these facilities are admitting residents from outside of the Poplar Bluff region due to decreased population in Butler County rather than the data presented by Black River Skilled Nursing for projected population growth.

The economic impact for Butler County may look appealing. However, Mr. Ben Sells stated in his open presentation of the project at Three Rivers College, staffing challenges would be handled by a recruiter based in Canada to bring foreign licensed professionals to the area. How can this be economically beneficial to the residents of Butler County?

I urge you to uphold the standards established by the Certificate of Need Committee on behalf of the residents of Butler County. Please vote in opposition or elect to not vote in this matter.

Respectfully,

A handwritten signature in black ink that reads "A. Campbell". The signature is written in a cursive, flowing style with a large, prominent "A" and a long, sweeping underline.

6/24/2025

Missouri Certificate of Need Program  
Attn: Alison Dorge  
P.O. Box 570  
Jefferson City, MO 65102

Missouri Certificate of Need Board,

Please accept this letter of opposition to Certificate of Need application presented by Black River Skilled Nursing on May 2, 2025. I am directly affected by this proposal.

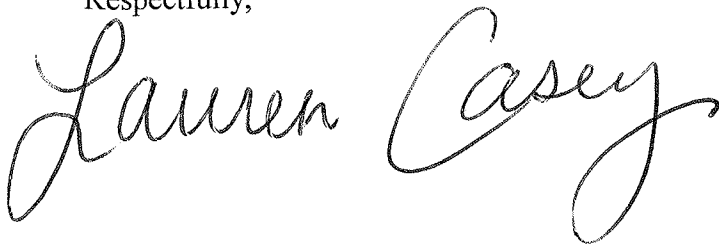
Simply put, the CON process and guidelines exist to determine a true existing need for additional licensed beds. The calculations included in this application do not support the established CON criteria. The data from Poplar Bluff facilities demonstrates an excess of available skilled nursing beds, not a deficit.

The five skilled nursing facilities in Butler County sometimes face unique challenges to achieve the average 61.2% occupancy reported for the fourth quarter of 2024. Often these facilities are admitting residents from outside of the Poplar Bluff region due to decreased population in Butler County rather than the data presented by Black River Skilled Nursing for projected population growth.

The economic impact for Butler County may look appealing. However, Mr. Ben Sells stated in his open presentation of the project at Three Rivers College, staffing challenges would be handled by a recruiter based in Canada to bring foreign licensed professionals to the area. How can this be economically beneficial to the residents of Butler County?

I urge you to uphold the standards established by the Certificate of Need Committee on behalf of the residents of Butler County. Please vote in opposition or elect to not vote in this matter.

Respectfully,

A handwritten signature in black ink that reads "Lauren Casey". The signature is written in a cursive, flowing style with a large, prominent "L" and a long, sweeping underline.

6/24/2025

Missouri Certificate of Need Program  
Attn: Alison Dorge  
P.O. Box 570  
Jefferson City, MO 65102

Missouri Certificate of Need Board,

Please accept this letter of opposition to Certificate of Need application presented by Black River Skilled Nursing on May 2, 2025. I am directly affected by this proposal.

Simply put, the CON process and guidelines exist to determine a true existing need for additional licensed beds. The calculations included in this application do not support the established CON criteria. The data from Poplar Bluff facilities demonstrates an excess of available skilled nursing beds, not a deficit.

The five skilled nursing facilities in Butler County sometimes face unique challenges to achieve the average 61.2% occupancy reported for the fourth quarter of 2024. Often these facilities are admitting residents from outside of the Poplar Bluff region due to decreased population in Butler County rather than the data presented by Black River Skilled Nursing for projected population growth.

The economic impact for Butler County may look appealing. However, Mr. Ben Sells stated in his open presentation of the project at Three Rivers College, staffing challenges would be handled by a recruiter based in Canada to bring foreign licensed professionals to the area. How can this be economically beneficial to the residents of Butler County?

I urge you to uphold the standards established by the Certificate of Need Committee on behalf of the residents of Butler County. Please vote in opposition or elect to not vote in this matter.

Respectfully,

A handwritten signature in black ink, appearing to read "Phil Ben Sells". The signature is written in a cursive, flowing style.

6/24/2025

Missouri Certificate of Need Program  
Attn: Alison Dorge  
P.O. Box 570  
Jefferson City, MO 65102

Missouri Certificate of Need Board,

Please accept this letter of opposition to Certificate of Need application presented by Black River Skilled Nursing on May 2, 2025. I am directly affected by this proposal.

Simply put, the CON process and guidelines exist to determine a true existing need for additional licensed beds. The calculations included in this application do not support the established CON criteria. The data from Poplar Bluff facilities demonstrates an excess of available skilled nursing beds, not a deficit.

The five skilled nursing facilities in Butler County sometimes face unique challenges to achieve the average 61.2% occupancy reported for the fourth quarter of 2024. Often these facilities are admitting residents from outside of the Poplar Bluff region due to decreased population in Butler County rather than the data presented by Black River Skilled Nursing for projected population growth.

The economic impact for Butler County may look appealing. However, Mr. Ben Sells stated in his open presentation of the project at Three Rivers College, staffing challenges would be handled by a recruiter based in Canada to bring foreign licensed professionals to the area. How can this be economically beneficial to the residents of Butler County?

I urge you to uphold the standards established by the Certificate of Need Committee on behalf of the residents of Butler County. Please vote in opposition or elect to not vote in this matter.

Respectfully,

A handwritten signature in cursive script, appearing to read "Amy Peters", with a long horizontal flourish extending to the right.