



July 7, 2025

Missouri Certificate of Need Program
P.O. Box 570
Jefferson City, Missouri 65102

RE: Project 6205 NS
Black River Skilled Nursing
Poplar Bluff, MO

To the Director and the Board:

I am writing in opposition to the above-reference project to construct a new nursing facility in Poplar Bluff. I write on behalf of both Oakdale Care Center ("Oakdale") of which I am the 80% Member of the operating company and 100% Member of the real estate company; and Westwood Hills Health & Rehabilitation Center ("Westwood Hills"), of which I am the 100% Member of the operating company. I have operated Westwood Hills since 2015 and Oakdale since 2017. I have pumped approximately \$50 million into the local community in terms of payrolls alone and provided high quality services to thousands of residents. I have borrowed and invested millions of dollars to make this happen. And I did so in reliance on the CON standards for the state of Missouri.

The complete absence of bed need is manifestly clear. Even the Applicant understands this and thus has resorted to asking you to consider "alternate" need calculations. What I ask of you is to use common sense. This market is not even close to having a bed need. It has many more beds than is typical; much lower occupancy than is typical; and a higher utilization rate than is typical. Even the CON Board's own staff shows a bed surplus now and in 2030. If this application is approved, when could the Board ever reject any application for a new nursing home?

I ask you, is it the right decision to ignore the outpouring of opposition from existing residents, families, and staff; to bypass the Board's own conclusion that the market is over-bedded; to suspend your own definition of bed need; and to pull the rug out from under existing business owners who have invested tens of millions of dollars in reliance upon the CON standards? I urge that it is not.

Before walking through those details in the paragraphs to follow, I will also mention that one of the existing five nursing homes in Poplar Bluff is for sale. I am in possession of the Offering Memorandum. If this were an application for a replacement facility, after acquiring that or another home, I would not be in opposition. That is the responsible way to have a new nursing home built in Poplar Bluff. Adding more beds to a market that is awash in excess beds is not.

1. THE PEOPLE HAVE SPOKEN

Through our representative, my two nursing facilities have submitted 105 letters in opposition to this project. These letters are from residents, families, staff, and even a few neighbors. They understand that the real threat to senior care in Poplar Bluff is too many beds, not too few. They fear for the quality of their care, for being consigned to a financially distressed nursing home, and for their jobs. This is just from my two nursing homes; I understand some of the other homes are also asking their residents, families, and staff what they think about this.

The Applicant's submission for this project included a number of letters of support. However, these skew massively in the direction of economic development, not need. In fact, our review identified just one letter from an actual nursing home resident.

2. **BED NEED**

To point out the obvious, this is an application for a Certificate of **Need**. Not want or wish, but need. Not economic development, but need. In this section, I will review the available public information and establish decisively that there is no bed **need** in the Poplar Bluff market.

(a) *Butler County already has a relatively high number of nursing homes beds per resident aged 65 or older.* The CON regulations state that a need exists when fewer than 53 beds per 1,000 residents 65+ is projected.¹

(1) The following population-based long-term care bed need methodology for the fifteen- (15-) mile radius shall be used to determine the need:

(A) Approval of additional intermediate care facility/skilled nursing facility (ICF/SNF) beds will be based on—

1. A service area need determined to be fifty-three (53) beds per one thousand (1,000) projected year population age sixty-five (65) and older minus the current supply of ICF/SNF beds shown in the most recent Six Quarter Occupancy of Hospital and Nursing Home Licensed and Available Beds report as provided by the Certificate of Need Program (CONP), which includes licensed and Certificate of Need (CON)-approved beds.

According to US Census data, Butler County in July 2024 had an estimated 41,814 residents, of which 19.9% were age 65 or older.² That comes to an estimated **8,321** residents age 65 or older. While that calculation is for the county and not strictly for a 15-mile radius around the Applicant's proposed site, the math would be very similar.

Butler County (and also a 15-mile radius around the proposed site) consists of five existing operators [see paragraph (b) following], with a combined total of 520 licensed beds (480 available beds per the CON Board website).

That means the market currently has 62 licensed beds per 1000 elderly residents, and 58 available beds per 1000 elderly residents:

520 licensed beds ÷ (8,321 residents ÷ 1,000) = **62** beds per 1,000 elderly residents

480 available beds ÷ (8,321 residents ÷ 1,000) = **58** beds per 1,000 elderly residents

Butler County's average of 62 licensed beds per 1,000 stands far above the statewide average of 46 beds per 1,000, in fact, 37% higher. Even the 58 available beds is far above the state average. This is the right county for **more** beds? Today, at least, Poplar Bluff needs one fewer nursing home, not one more.

¹ <https://health.mo.gov/information/boards/certificateofneed/pdf/19c60-50.pdf>

² <https://www.census.gov/quickfacts/fact/table/butlercountymissouri,US/PST045224>

But what about in 2030? If this project happens, there will be 605 beds in 2030. For that to equal the CON regulation's requirement of 53 beds per 1,000 by 2030, there will have to be 11,415 residents of that age:

$$605 \text{ projected beds} \div (\mathbf{11,415 \text{ aged 65+ residents}} \div 1,000) = 53 \text{ beds per 1,000}$$

Does anyone believe that the number of Butler County residents over the age of 65 is going to soar from 8,321 in 2024 to 11,415 in 2030? That would be an increase of 3,094 such residents in five years, a 39% increase. I think we can safely say, not a chance.

- (b) *The local Poplar Bluff market already suffers from low occupancy.* Poplar Bluff is currently served by five nursing homes, with bed capacity and occupancy information taken from the CON Board's website for the first quarter of 2025.³ Even using Available Beds, the average occupancy is just 60.8%. That total falls to 51.6% if this project's 85 beds are added to the totals. The same CON Board data shows that the statewide average occupancy is 71.7%. In fact, Butler County ranks 89th among Missouri's 114 counties in nursing home occupancy, and the Board's own calculations show the area to have a 23-bed surplus in 2030.

2025 Q1 DATA REPORTED BY CON BOARD					
NAME	ADDRESS	LICENSED	AVAILABLE	OCCUPANCY	
		BEDS	BEDS	OCCUPANCY	% OF AVAIL
Aspire Senior Living Poplar Bluff	3001 May St	120	96	43.5	45.3%
Cedargate Healthcare	2350 Kanell Blvd	108	92	54.4	59.2%
The Manor	2071 Barron Rd	90	90	66.2	73.5%
Oakdale Care Center	2702 Debbie Ln	70	70	64.7	92.4%
Westwood Hills Health & Rehabilitation Center	3100 Warrior Lane	132	132	63.0	47.7%
TOTAL, POPLAR BLUFF		520	480	291.7	60.8%
Applicant		85	85	0.0	0.0%
TOTAL WITH APPLICANT		605	565	291.7	51.6%

- (c) *The application cites beds taken out of service as evidence of bed need.* That stands logic on its head. There is one reason, and one reason only, that an operator takes a room, or perhaps an entire unit, offline: absence of demand. Absence of demand is the very opposite of need. If the need were there for all 520 beds licensed in this market, I assure you my fellow operators and I would immediately have those now-unused beds back in service.

3. SUITABILITY OF THE EXISTING BEDS

Because the project cannot be justified based on bed need, the gist of the CON application is that the existing beds aren't suitable for consumers. There is no support for that assertion.

- (a) *Lack of evidence.* We take note that the application does not document the assertion that the public finds the existing beds unsuitable. In fact, out of 24 letters of support, only two are from individuals and only one of those is clearly self-identified as a nursing home resident.
- (b) *Elderly Butler County residents actually are more likely to choose a local nursing home than the state average.* In fact, matching up US census data with the CON Board's occupancy data, 3.5% of the 65+ population has made the decision to enter one of the five existing nursing homes. This is a higher

³ <https://health.mo.gov/information/boards/certificateofneed/pdf/icfsnfsum.pdf>

utilization rate than the state average, which is 3.1%.⁴ The applicant's assertion that local people are averse to using the existing nursing homes is baseless.

4. QUALITY OF CARE ISSUES

The applicant has also made an issue of the quality of care in the existing local nursing homes. Once again, these assertions are baseless and belied by the track record of the existing homes and of the applicant. These are the CMS quality measure star ratings for the five incumbent nursing homes:

Current Operators	Quality Measure Stars (per CMS) ⁵	Available Beds ⁶
Westwood Hills	★★★★★	69
Oakdale	★★★☆☆	5
Cedargate	★★☆☆☆	38
Aspire Senior Living (f/k/a Mark Twain)	★☆☆☆☆	52
The Manor	★☆☆☆☆	24
CURRENT OPERATOR AVERAGE	2.40 stars	188

That is to say, the current operators have 69 available beds at 5-star quality rating and a total of 112 with 2 or more quality stars. That stands in contrast to the quality provided at the applicant's existing nursing homes. Whereas the existing operators average 2.40 quality stars and offer 5-star quality in one nursing home, the applicant averages 2.0 quality stars and does not exceed 3-stars anywhere. There is no objective reason to expect that the operator would have better outcomes in this project than he has had in his existing nursing homes.

Applicant's Current Facilities ⁷	Quality Measure Stars (per CMS) ⁸
Daybreak Nursing Center	★★★☆☆
Winchester Nursing Center	★★★☆☆
Gideon Care Center	★★☆☆☆
Rock Point Nursing Center	★★☆☆☆
Memory Lane of Dexter	★☆☆☆☆
Prairie View Skilled Nursing	★☆☆☆☆
APPLICANT'S AVERAGE	2.00 stars

⁴ From the same CON and census sources.

⁵ <https://www.medicare.gov/care-compare/?redirect=true&providerType=NursingHome>

⁶ From the CON board website data for Q1 2025

⁷ Based on the skilled nursing homes listed at: <https://www.paradigmsenior.com/communities-overview.html>

⁸ <https://www.medicare.gov/care-compare/?redirect=true&providerType=NursingHome>

5. MEMORY CARE

Another argument made by the Applicant is that Poplar Bluff needs memory care, which the Applicant asserts is missing from the market.

This is untrue. Cedargate has a dedicated 12-room memory care unit, which I believe but was unable to confirm holds 24 beds. The Manor has a 30 bed memory care unit, which runs an occupancy of about 20.

Also of note: Aspire Senior Living had a memory care unit. It was closed during the pandemic due to a lack of demand. I investigated the possibility of opening a memory care unit at my Westwood Hills location, but was unable to detect significant unmet need.

Poplar Bluff already has 54 beds of memory care, with no identifiable unmet demand. While I lack the data to directly analyze it, I would be astonished if many local markets in Missouri have more memory care beds, relative to 65+ population, than Poplar Bluff.

6. OPERATIONAL ISSUES

The development of a new nursing facility in Poplar Bluff will inevitably have a negative cascading effect on the existing nursing homes and even other businesses.

Staffing for nursing homes is exceedingly challenging, with most operators struggling to find the necessary licensed nurses, CNAs, management, and other staff. My own experience in Poplar Bluff is that we have raised our overall pay scale by 47% in the past five years, just to maintain the workforce that we have. Those pay hikes at best have enabled us to hold our ground and have not drawn appreciably more people into the workforce.

When the available workforce is stretched over six operators versus five, those challenges become even more acute. It should be understood that many more elderly residents will be residing in the five 'original' nursing homes than in the new project. Those residents will have to be taken care of with fewer resources and uncertain staffing.

Payer mix is another highly relevant issue. In the nursing home business, one typically earns a suitable financial margin from providing skilled care (usually Medicare or commercial insurance), which offsets the negative margin from providing long-term care (usually Medicaid or private pay). When a nursing home has too many negative-margin Medicaid residents imbalanced by too few positive-margin Medicare patients, financial viability can be lost. When a new home opens in a market, it is common to see the skilled care business migrate heavily to the new facility, leaving the other homes with too much Medicaid to sustain the business.

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steve.miller@bridgemarkhealthcare.com
www.bridgemarkhealthcare.com



Certificate of Need Program

REPRESENTATIVE REGISTRATION

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

Project Name

Black Lives Matter Missouri

Number

6205

(Please type or print legibly.)

Name of Representative

Jewel Patel

Title

Firm/Corporation/Association of Representative (may be different from below, e.g., law firm, consultant, other)

Patel & Associates

Telephone Number

573.690.3573

Address (Street/City/State/Zip Code)

331 Madison Jefferson City MO 65102

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

Asprice Saino Group, The Mirror, Oakdale, Webster

Telephone Number

Address (Street/City/State/Zip Code)

Poplar Bluff, MO

Check one. Do you:

- ☐ Support
☒ Oppose
☐ Neutral

Relationship to Project:

- ☐ None
☐ Employee
☐ Legal Counsel
☐ Consultant
☒ Lobbyist
☐ Other (explain):

Other Information:

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: 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.

Original Signature

Date

5/12/25



Aspire Skilled Nursing and Rehab

June 27, 2025

Missouri Certificate of Need Program
Missouri Department of Health and Senior Services
P.O. Box 570
Jefferson City, MO 65102

Dear Members of the Certificate of Need Board,

Subject: Opposition to the Proposed Certificate of Need for a New Nursing Home in Poplar Bluff, Missouri

I am writing to formally oppose the application for a Certificate of Need (CON) to establish a new nursing home in Poplar Bluff, Missouri. Issuing this CON would be detrimental to all healthcare facilities in our region. Poplar Bluff does not have a need for more nursing home beds and currently has sufficient nursing home capacity to meet the needs of its population. The area already has multiple facilities providing quality care to residents. Adding another facility to the area would not only cause financial strain on current facilities but also would exacerbate the current staffing challenges. Both of which would negatively impact on the quality of care delivered to residents across all facilities. It is crucial that we prioritize supporting and strengthening existing facilities, rather than expanding capacity where it is not needed.

Personally, I have worked in Long Term Care for over 20 years as a nurse and 7 years as an administrator. I take pride in offering a loving home with an exceptional quality of care to our residents. My current home, Aspire Senior Living of Poplar Bluff, is a beautiful building that is continuously being remodeled and updated to meet the needs of our residents. As we all know, the quality of care is not based on how old a building is or how state of the art the building is. Quality of care is based on the work ethics of the healthcare professionals providing care to our residents as well as having a passion for caring for those who cannot care for themselves.

For these reasons, I respectfully request that the CON board deny the application for a new nursing home in Poplar Bluff. Instead, efforts should be directed toward enhancing the quality and efficiency of current healthcare providers to better serve the community's needs.

Thank you for your consideration of this matter. Should you require any further information or clarification, please do not hesitate to contact me at 573-281-5332 or tarat@aspireseNIorliving.health.

Sincerely,

Tara Tramel

07/01/2025

Missouri Certificate of Need Program

Missouri Department of Health and Senior Services

P.O. Box 570

Jefferson City, MO 65102

Dear Members of the Certificate of Need Board,

Subject: Opposition to the Proposed Certificate of Need for a New Nursing Home in Poplar Bluff, Missouri

I am writing as a family member who has a brother residing in a facility in Poplar Bluff. I formally oppose the application for a Certificate of Need (CON) to establish a new nursing home in Poplar Bluff, Missouri. Based on current healthcare data and community needs, I believe that issuing this CON would be detrimental to the existing healthcare landscape in the region. Our community already has 5 skilled nursing facilities within our town which are able to meet the nursing needs of our community.

Poplar Bluff currently has sufficient nursing home capacity to meet the needs of its population. The area is already overcrowded, with multiple facilities providing quality care to residents. The addition of another nursing home would likely lead to further market saturation, which could result in unnecessary duplication of services and financial strain on existing providers.

Furthermore, the region is experiencing a significant staffing shortage across healthcare facilities, including long-term care providers. The introduction of an additional nursing home would exacerbate this staffing crisis, potentially impacting the quality of care delivered to residents across all facilities. It is crucial that we prioritize supporting and strengthening existing facilities, rather than expanding capacity where it is not needed. The current facility my brother is in is doing all they can to provide the care they can to the residents of their facility. Since COVID, nursing home and other healthcare setting have had a challenging time recruiting and retaining the staff they need to care for the elderly and disability. If another SNF is built it will weaken the already fragile staffing base that all current 5 SNF and the local hospital pull from. I know Poplar Bluff elected officials are

really supporting this building mainly only looking at the revenue it will bring into the area, but they are failing to look at the negative staffing effects it will have on the current SNF already here. Poplar Bluff DOES NOT need another nursing facility. The 5 we already have is sufficient.

For these reasons, I respectfully request that the CON board deny the application for a new nursing home in Poplar Bluff. Instead, efforts should be directed toward enhancing the quality and efficiency of current healthcare providers to better serve the community's needs.

Thank you for your consideration of this matter. Should you require any further information or clarification, please do not hesitate to contact me

Sincerely,

Opal Karen Bertholomey (family member)

Opal Karen Bertholomey

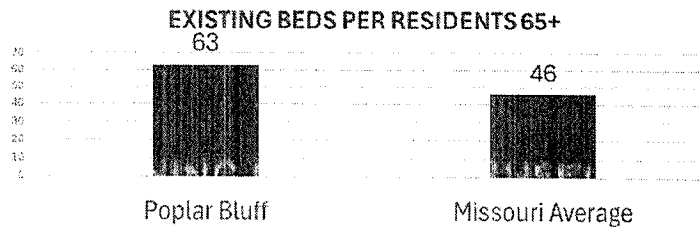
Aspire Senior Living of Poplar Bluff

Family members of 1 resident of this facility.

POPLAR BLUFF NURSING HOME FACT SHEET

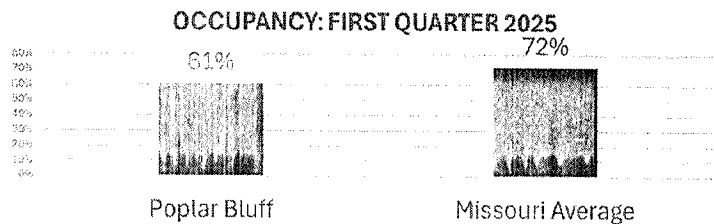
DOES POPLAR BLUFF CURRENTLY HAVE ENOUGH NURSING HOME BEDS?

YES! Poplar Bluff has way more nursing home beds than is normal!



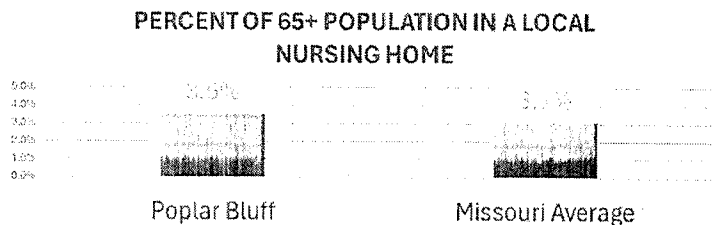
ARE THE EXISTING BEDS MOSTLY FILLED?

NO! The existing homes have more than 200 unfilled beds, putting occupancy at just over 60%, compared to the state average of 72%.



ARE THE BEDS EMPTY BECAUSE PEOPLE THINK THE EXISTING HOMES ARE UNDESIRABLE?

NO! Citizens 65+ in Poplar Bluff are **more likely** to choose a local nursing home, not less.



DO THE EXISTING NURSING HOMES PROVIDE GOOD QUALITY?

YES! The existing homes have 132 beds rated the maximum 5 stars by CMS for Quality Measures, and more than 200 beds rated 3 or more stars. Over 60 of them are unoccupied.

CMS QUALITY RATINGS	Available	
	Total	Today!
Rated 5 stars	132	62
Rated 3+ stars	202	67

Please feel free to write your own comments and turn this in to Darren Collins or Tara Tramel, Administrators of Aspire Senior Living, who will collect all the letters and submit them for the upcoming hearing.

I have been a long term care nurse in Butler + Dunklin co for over 36 years as a RN, LPN, CNA Instructor, Med Tech Instructor, and DON. We struggle daily to get staff into our buildings. Having another facility will further strain the staffing situation in this area.

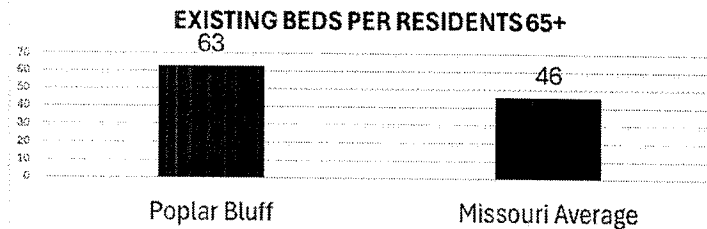
Name and Relationship to ASL-Poplar Bluff:

Patty Mickloff RN, DON

POPLAR BLUFF NURSING HOME FACT SHEET

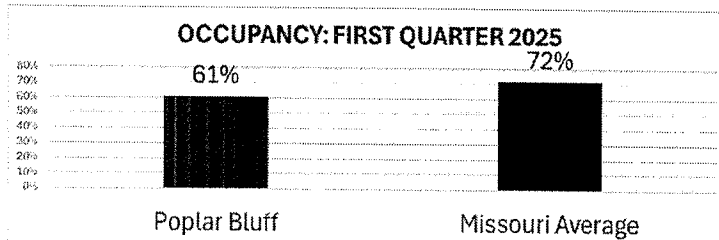
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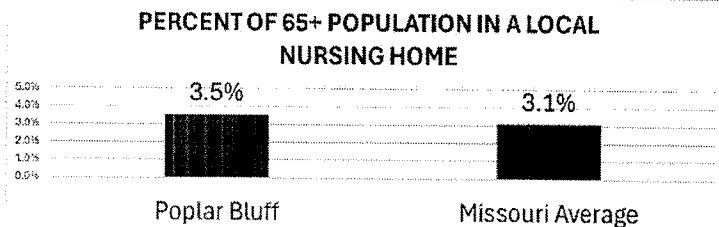
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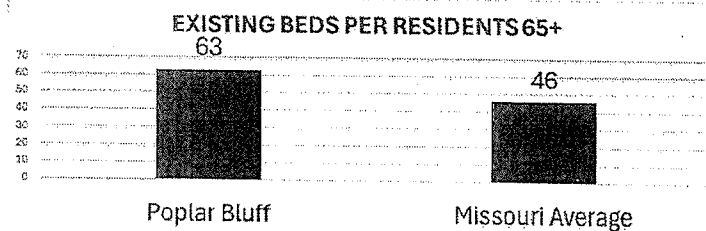
Hi, I work at Aspire in Poplar Bluff. I personally think we should not open another facility in town, because we have buildings in PB that have plenty of open beds. I think opening another facility would take a lot from the other buildings and that is not fair to the staff working in them or the residents living in them.

Name and Relationship to ASL-Poplar Bluff.

POPLAR BLUFF NURSING HOME FACT SHEET

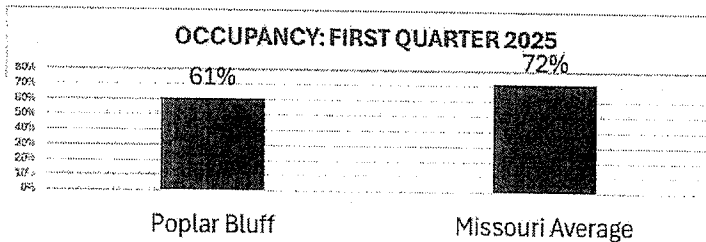
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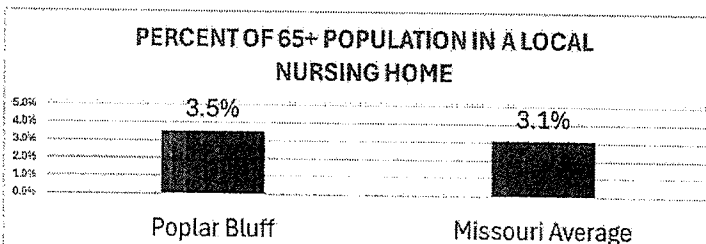
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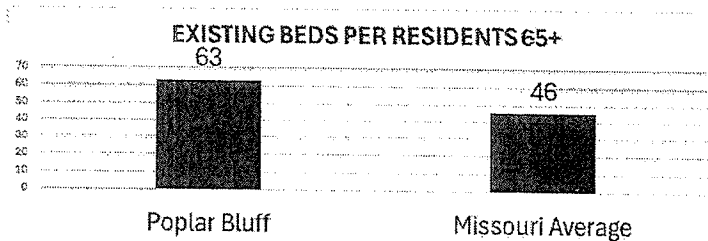
I don't see a need for another facility when all the ones now have plenty of beds. Plus everyone now is already struggling w/ staffing, how is a new facility going to help w/ that? Residents will suffer if a new facility opened up. No facility will have proper staffing needs to care for them.

Name and Relationship to ASI - Poplar Bluff: *Ladanya Barnes, Medical Records, Housekeeping Sup.*

POPLAR BLUFF NURSING HOME FACT SHEET

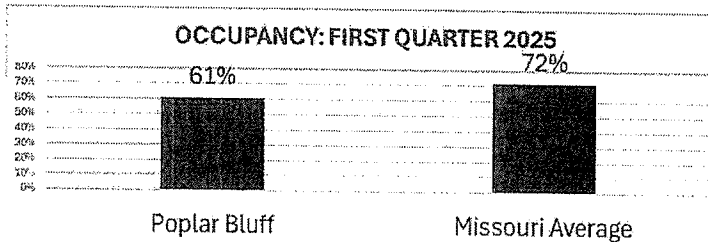
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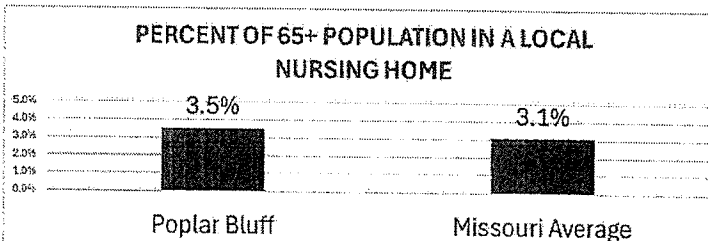
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As a medical social worker for 29 years in the Poplar Bluff area, I am confident that Poplar Bluff has enough existing nursing homes with beds available to meet the needs of our community. The current homes have the ability to provide good quality care. Staffing issues abound already in this area, due to changes in healthcare since covid. The area nursing homes & staffing would be negatively impacted by opening a 6th facility, in my opinion.

Name and Relationship to ASL-Poplar Bluff: *J. Mosley-Olsen, MSW*



Aspire Skilled Nursing and Rehab

July 1, 2025

Missouri Certificate of Need Program
Missouri Department of Health and Senior Services
P.O. Box 570
Jefferson City, MO 65102

Dear Members of the Certificate of Need Board,

Subject: Opposition to the Proposed Certificate of Need for a New Nursing Home in Poplar Bluff, Missouri

I wanted to share some professional concerns regarding the proposed 85 bed Black River Skilled Nursing Facility that's currently under Certificate of Need review.

As a nurse working in Poplar Bluff, I believe this project is not only unnecessary but potentially harmful to the long-term care system we already have in place. Our community has five existing LTC facilities, many operating well below capacity- some as low as 37-45% occupancy. The Black River CON even admits projected occupancy of just 49.9% in year one, yet assumes it will somehow reach 80% by year two, which doesn't reflect our current market realities or local census trends.

What worries me most is that this new facility would rely heavily on Medicaid (65% of its payer mix) at a time when Missouri is facing historic Medicaid funding cuts. These cuts will reduce reimbursement rates, worsen staffing shortages, and possibly push one or more of our current homes into closure. Statistically, one of our five homes is already vulnerable.

Even more concerning, the CON application includes no staffing plan. There is no explanation for how they intend to recruit or retain staff- especially for the 20 bed Alzheimer's unit that requires specialized training and higher care ratios. Missouri already ranks near the bottom in nurse staffing hours, and we're already struggling to maintain coverage across shifts.

Rather than building another facility, I believe our community should be focused on strengthening and supporting homes we already have, improving staff retention, care environments, and resident outcomes.

I'd love to hear your thoughts on this. Thank you for taking the time to read my concerns

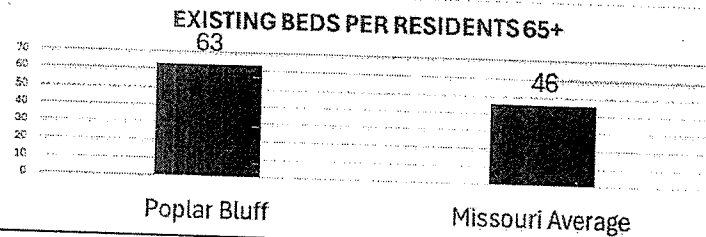
Sincerely,

Misty Pryor LPN

POPLAR BLUFF NURSING HOME FACT SHEET

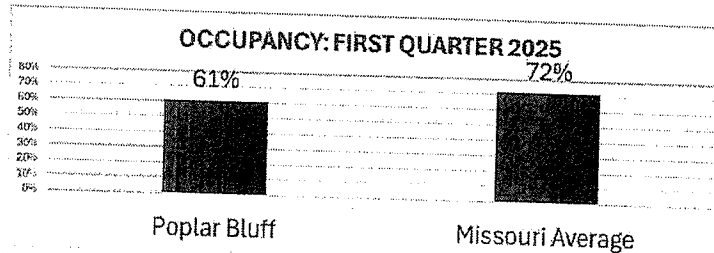
DOES POPLAR BLUFF CURRENTLY HAVE ENOUGH NURSING HOME BEDS?

YES! Poplar Bluff has way more nursing home beds than is normal!



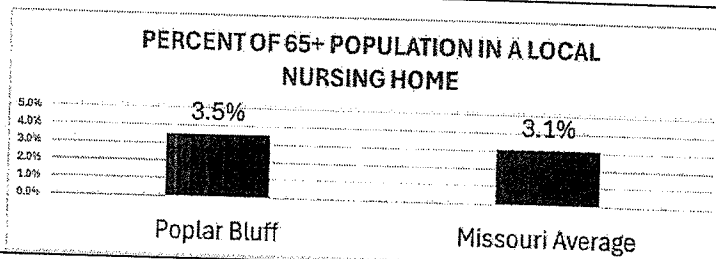
ARE THE EXISTING BEDS MOSTLY FILLED?

NO! The existing homes have more than 200 unfilled beds, putting occupancy at just over 60%, compared to the state average of 72%.



ARE THE BEDS EMPTY BECAUSE PEOPLE THINK THE EXISTING HOMES ARE UNDESIRABLE?

NO! Citizens 65+ in Poplar Bluff are **more likely** to choose a local nursing home, not less.



DO THE EXISTING NURSING HOMES PROVIDE GOOD QUALITY?

YES! The existing homes have 132 beds rated the maximum 5 stars by CMS for Quality Measures, and more than 200 beds rated 3 or more stars. Over 60 of them are unoccupied.

CMS QUALITY RATINGS	Total	Available Today!
Rated 5 stars	132	62
Rated 3+ stars	202	67

Please feel free to write your own comments and turn this in to Darren Collins or Tara Tramel, Administrators of Aspire Senior Living, who will collect all the letters and submit them for the upcoming hearing.

Building a new facility may sound good, by it having all the new technology + updated rooms. However, I feel it is important to consider all the surrounding facilities that have vacant rooms and strained on staffing. Opening another facility will only put more of a strain on the shortage of staffing.

Name and Relationship to ASL-Poplar Bluff:

Ann Davidson - Activity Director



Aspire Skilled Nursing and Rehab

06/25/2025

Missouri Certificate of Need Program

Missouri Department of Health and Senior Services

P.O. Box 570

Jefferson City, MO 65102

Dear Members of the Certificate of Need Board,

Subject: Opposition to the Proposed Certificate of Need for a New Nursing Home in Poplar Bluff, Missouri

I am writing to formally oppose the application for a Certificate of Need (CON) to establish a new nursing home in Poplar Bluff, Missouri. Based on current healthcare data and community needs, I believe that issuing this CON would be detrimental to the existing healthcare landscape in the region. Our community already has 5 skilled nursing facilities within our town which are able to meet the nursing needs of our community.

Poplar Bluff currently has sufficient nursing home capacity to meet the needs of its population. The area is already overcrowded, with multiple facilities providing quality care to residents. The addition of another nursing home would likely lead to further market saturation, which could result in unnecessary duplication of services and financial strain on existing providers.

Furthermore, the region is experiencing a significant staffing shortage across healthcare facilities, including long-term care providers. The introduction of an additional nursing home would exacerbate this staffing crisis, potentially impacting the quality of care delivered to residents across all facilities. It is crucial that we prioritize supporting and strengthening existing facilities, rather than expanding capacity where it is not needed.

Mr. Sells has indicated he is seeking additional nursing staff by bring over nurses from Canada and or other counties. It's my experience that this rarely works. Our area is such a big culture shock for them that they rarely stay for very long. The prior operator who had our facility tried an international nursing program on 2 separate occasions which we spent a year processing to get their work VISA approved. The first gentleman and his spouse were so unhappy due to the culture shock value that they left abruptly due to the county they were from not having SNF level of care that he was trained for. Our second experience with this was I personally spent over a year community back and forth with a Pathways Nursing Agency which our facility had contracted with. After a year of back-and-forth communication and establishing housing and other needed items to get them set up for employment, she opted to leave after less than 6 months due to our town being so small compared to the area she was used to. She opted to buy out her contract and move to Texas to work in the hospital setting which was her training area. When I asked why she was opting to leave, she informed me that the nursing home setting what not an area she was trained for when she did her training to be a nurse in the Philippines and that she felt it was not an area she wanted to do. So even thou some highly populated areas have some minor success with this type of program, our area is not due to the rural factor of our area.

3001 May St., Poplar Bluff, MO 63901

www.aspireseniorliving.health



Aspire Skilled Nursing and Rehab

For these reasons, I respectfully request that the CON board deny the application for a new nursing home in Poplar Bluff. Instead, efforts should be directed toward enhancing the quality and efficiency of current healthcare providers to better serve the community's needs.

Thank you for your consideration of this matter. Should you require any further information or clarification, please do not hesitate to contact me

Sincerely,

Darren K. Collins, LNHA

Aspire Senior Living of Poplar Bluff

Family members of 2 residents of this facility.

5/31/25

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 the administrator of a long term care facility in Southeast Missouri. My residents, and their friends and family will be directly affected by this approval.

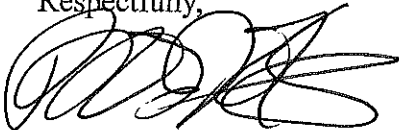
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The economic impact for Butler County may look appealing. However, Mr. Ben Sells stated in his open presentation of the project at Three Rivers College, staffing challenges would be handled by a recruiter based in Canada to bring foreign licensed professionals 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 be "M. D. Sells", written over the word "Respectfully,".

6/2/2025

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

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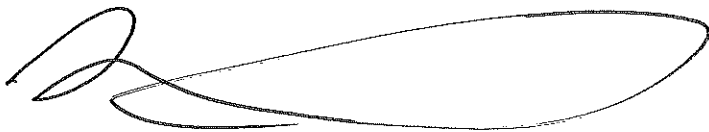
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Respectfully,



, SSD

6/2/2025

Missouri Certificate of Need Program
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P.O. Box 570
Jefferson City, MO 65102

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Respectfully,

Cristen Williams RN

6/2/2025

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

Missouri Certificate of Need Board,

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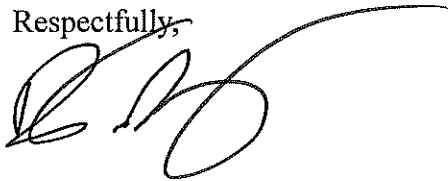
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6/2/2025

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

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Respectfully,

A handwritten signature in black ink, appearing to read "Kristin Carthage", with a long horizontal flourish extending to the right.

6/2/2025

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P.O. Box 570
Jefferson City, MO 65102

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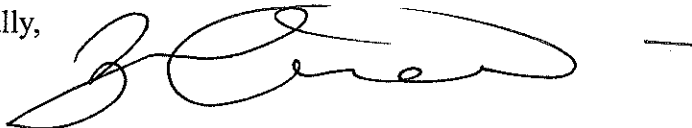
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6/2/2025

Missouri Certificate of Need Program
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P.O. Box 570
Jefferson City, MO 65102

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6/2/2025

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Respectfully,

A handwritten signature in black ink, appearing to read "H. Simpson". The signature is written in a cursive, flowing style with a large, prominent "H" and "S".

6/2/2025

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

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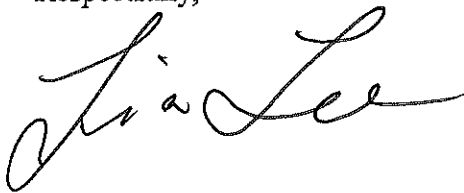
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Respectfully,

A handwritten signature in cursive script, appearing to read "Lisa Lee". The signature is written in dark ink and is positioned below the "Respectfully," text.

6/4/2025

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

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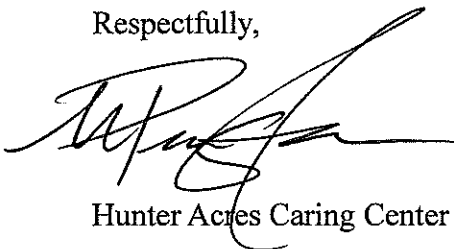
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Hunter Acres Caring Center

628 N West St

Sikeston MO63801

6/5/2025

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 the CNA Educator of a long term care facility in Southeast Missouri. My students, the residents they care for, and their friends and family will be directly affected by this approval.

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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. As both a CNA Educator and a RN Test Observer who helps in the process of training and certifying those in the area to work in these job roles, it worries me to see an outside workforce being brought in to compete with them for these jobs. This will drive down any competitiveness in pay that those in the local community in these roles may see. 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,

 K Adams RN CNA Educator
Katherine Adams RN

6/5/2025

Missouri Certificate of Need Program
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Jefferson City, MO 65102

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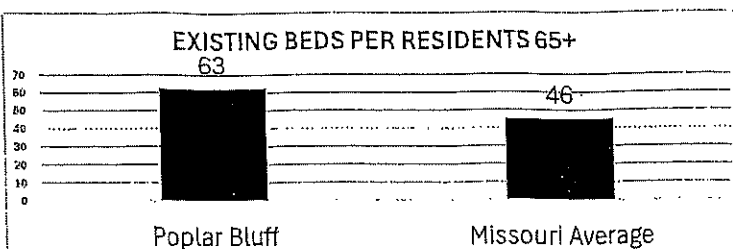
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POPLAR BLUFF NURSING HOME FACT SHEET

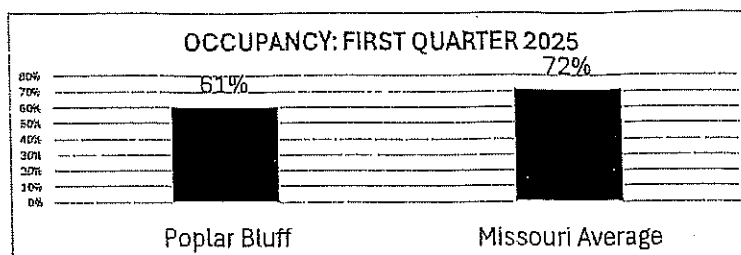
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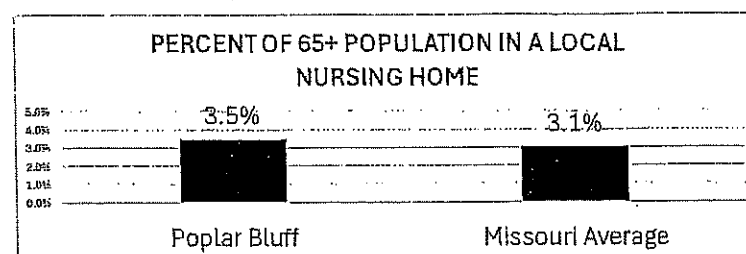
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CMS QUALITY RATINGS	Total	Available Today!
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Rated 3+ stars	202	67

Please feel free to write your own comments and turn this in to Joetta Martin, Administrator of Westwood Hills, who will collect all the letters and submit them for the upcoming hearing.

A new facilities here in Poplar Bluff Mo. Is going to hurt all the other facilities here and the workers.

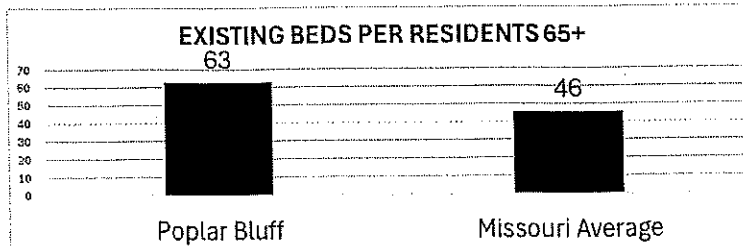
Name and Relationship to Westwood Hills:

Dorothy Von Ruedgisch
Sister Florence Monehan

POPLAR BLUFF NURSING HOME FACT SHEET

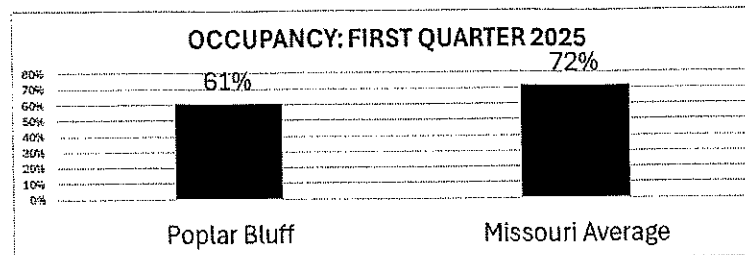
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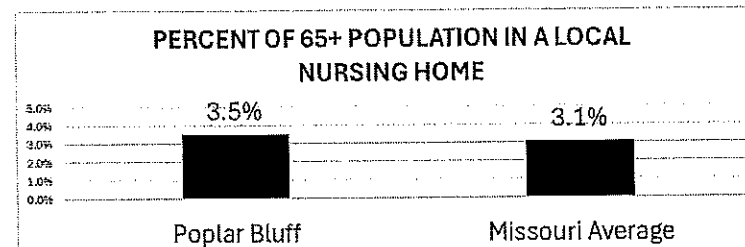
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Our mother has been at Westwood for little over 3 yrs. and we feel the care has been good quality care. They go out of their way for her to feel special.

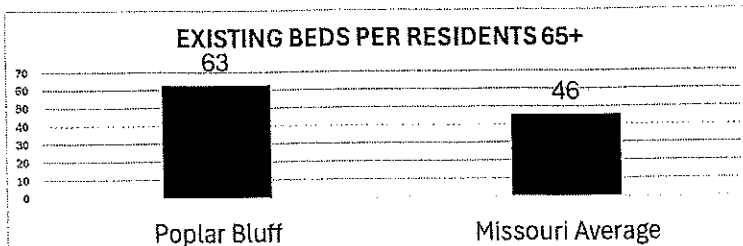
Name and Relationship to Westwood Hills:

Mr. & Mrs. Harry Mathis
family member

POPLAR BLUFF NURSING HOME FACT SHEET

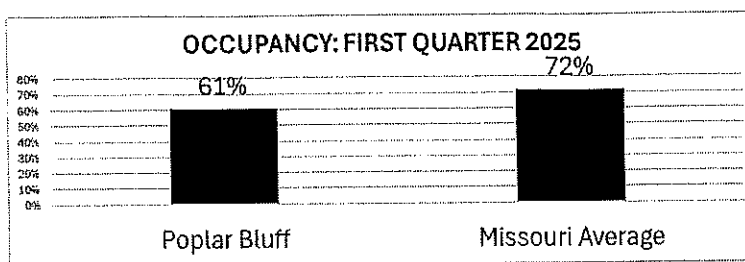
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YES! Poplar Bluff has way more nursing home beds than is normal!



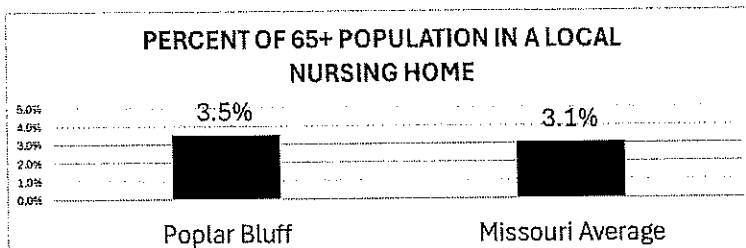
ARE THE EXISTING BEDS MOSTLY FILLED?

NO! The existing homes have more than 200 unfilled beds, putting occupancy at just over 60%, compared to the state average of 72%.



ARE THE BEDS EMPTY BECAUSE PEOPLE THINK THE EXISTING HOMES ARE UNDESIRABLE?

NO! Citizens 65+ in Poplar Bluff are **more likely** to choose a local nursing home, not less.



DO THE EXISTING NURSING HOMES PROVIDE GOOD QUALITY?

YES! The existing homes have 132 beds rated the maximum 5 stars by CMS for Quality Measures, and more than 200 beds rated 3 or more stars. Over 60 of them are unoccupied.

CMS QUALITY RATINGS

Rated 5 stars
Rated 3+ stars

Total

132
202

Available Today!

62
67

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I am the dietitian at Westwood Hills, and have been for over 12 years. The quality of care is excellent and many employees have been employed here for many years, and are local, and have excellent rapport with residents.

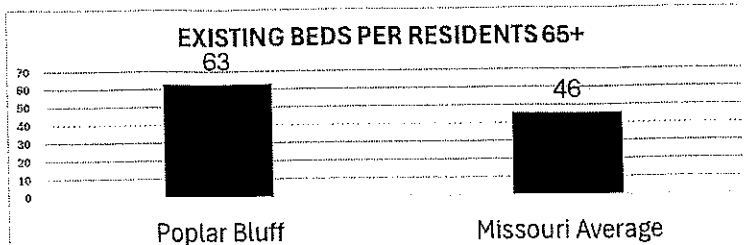
Name and Relationship to Westwood Hills:

Kathy Murdock, MS RD LD
Dietitian

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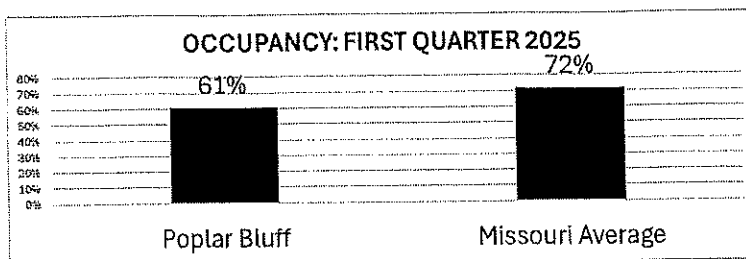
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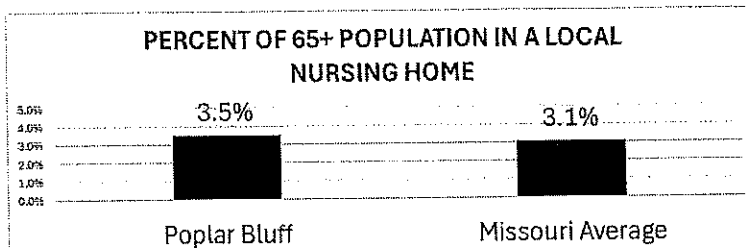
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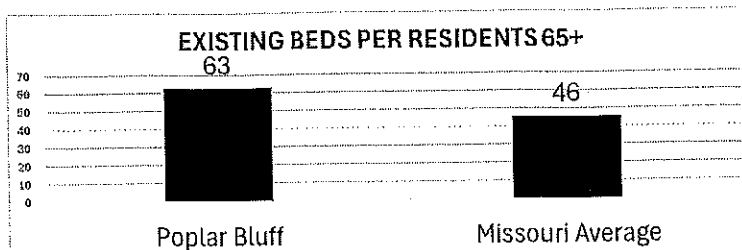
Name and Relationship to Westwood Hills:

Don Corns, M.D.

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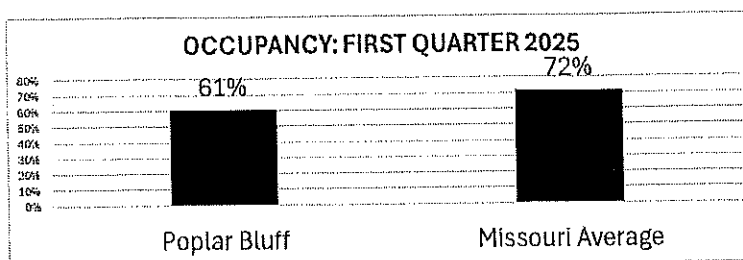
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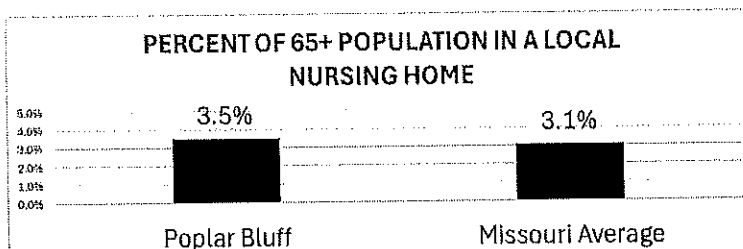
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The reason I feel we do not need another nursing home is because we are a small community and the nursing homes that we have are ~~supplying~~ performing a great job with our community. Helping with supplying jobs also good care for the elderly in our community.

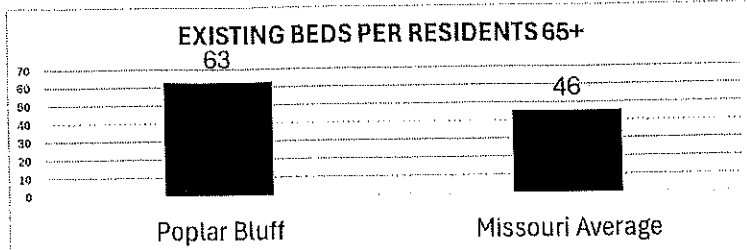
Name and Relationship to Westwood Hills:

Ruth Jones, Receptionist

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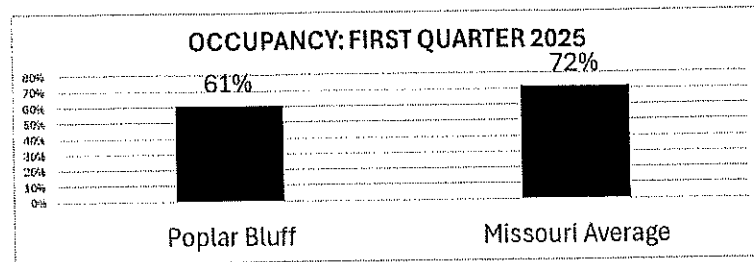
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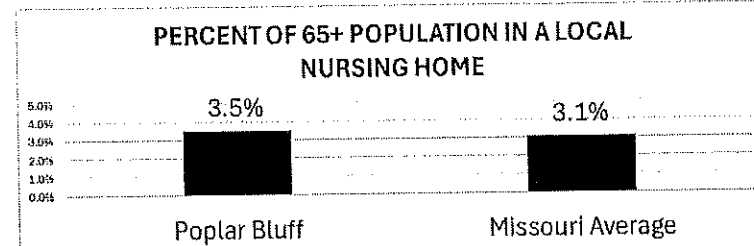
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Having another facility nursing home in Poplar Bluff would hurt more than it help I work at a 5 star facility and we have empty beds at the present time. Every nursing facility in the Bluff has empty beds. Please don't consider this and jeopardize my job!!

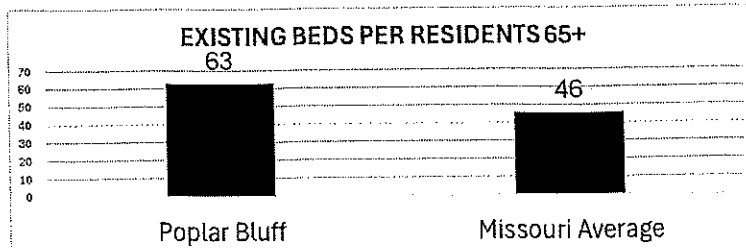
Name and Relationship to Westwood Hills:

Bobbie Hill Dietary Manager

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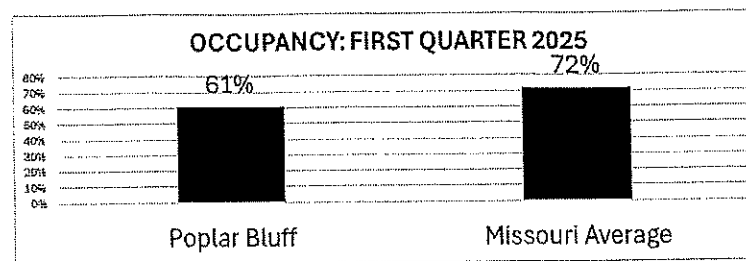
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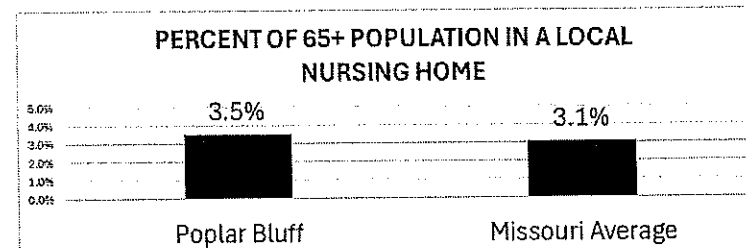
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Poplar Bluff, MO doesn't need no more nursing homes !!!!!!!

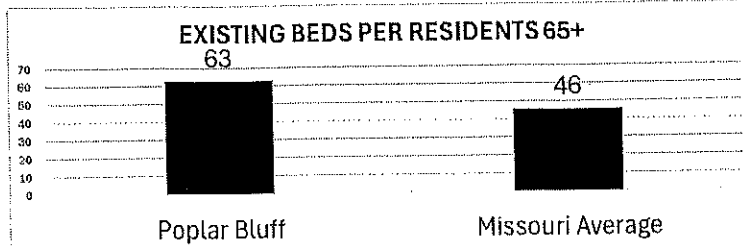
Name and Relationship to Westwood Hills:

Sequoia White COO

POPLAR BLUFF NURSING HOME FACT SHEET

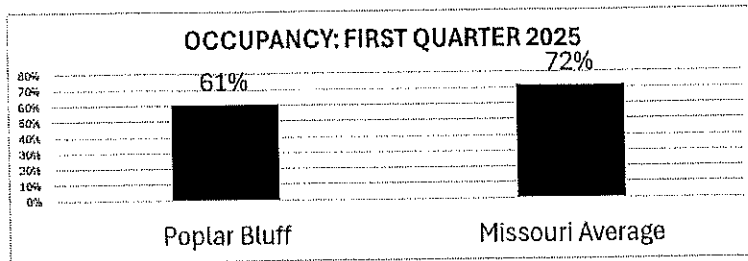
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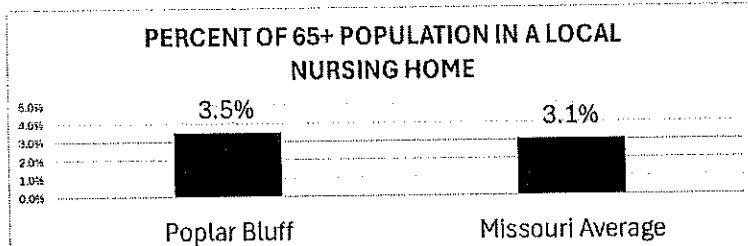
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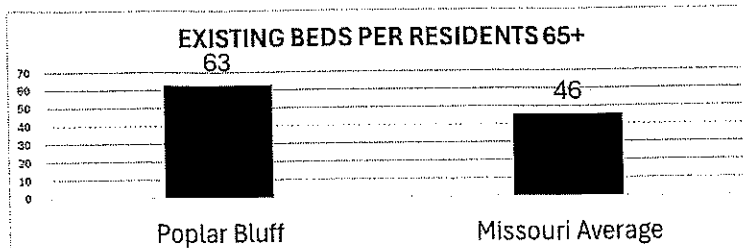
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Name and Relationship to Westwood Hills: Esther Boulnois Dietary Aid

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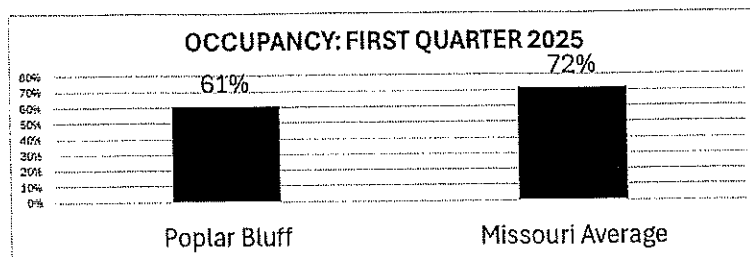
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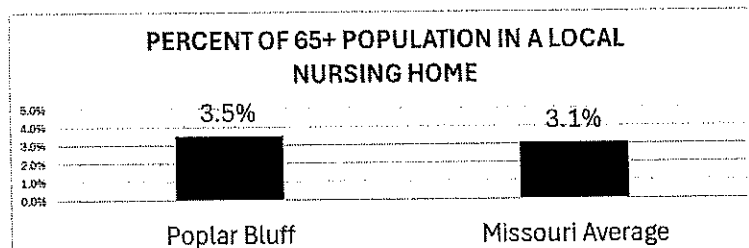
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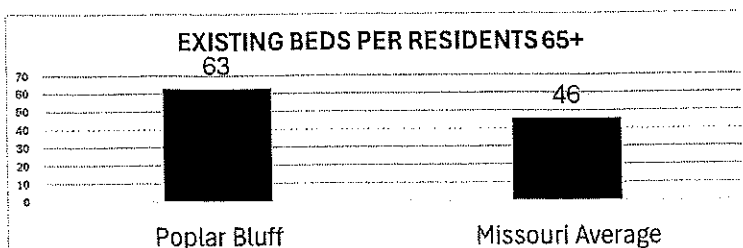
I do not think Poplar Bluff needs another nursing home. Every nursing home here has empty beds that are not being filled. We are a five star facility & we don't have our beds filled. This would hurt more people than it would help. It would end up costing a lot of people their jobs in the long run. I have disabled children & I personally need my job, please do not jeopardize this!

Name and Relationship to Westwood Hills: Bethany Harris, Social Services

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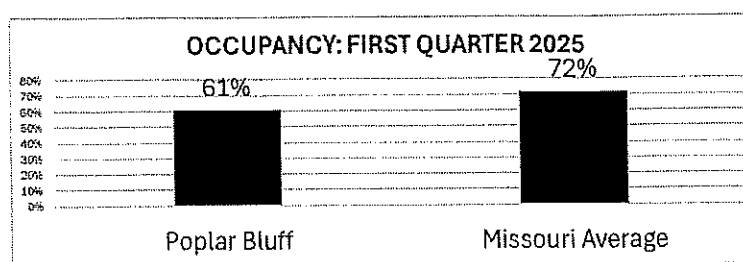
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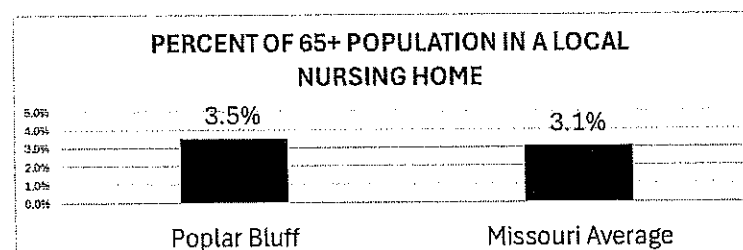
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Poplar Bluff already has too many nursing home beds. Westwood Hills is a 5 star facility, but we still have empty beds. A new facility will hurt all the existing homes and even though not new, these are the homes for many residents. I also worry about losing our staff, because a new home will hire from all of the existing homes. I do not believe the existing CON regulations would allow a new home to be built.

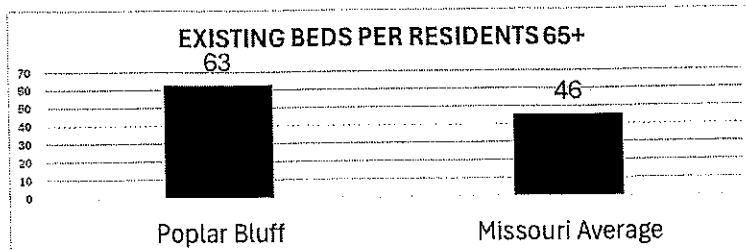
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*Joetta Martin,
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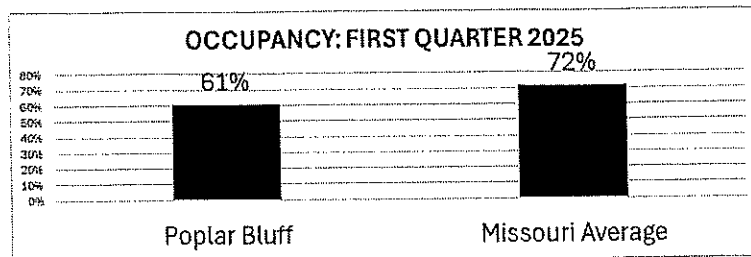
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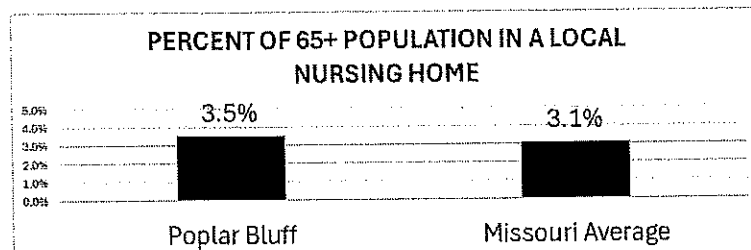
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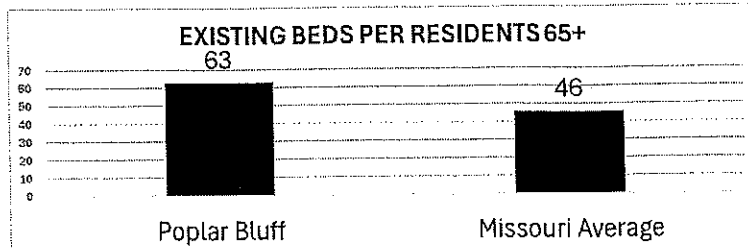
Name and Relationship to Westwood Hills:

Dietary Department - Cook

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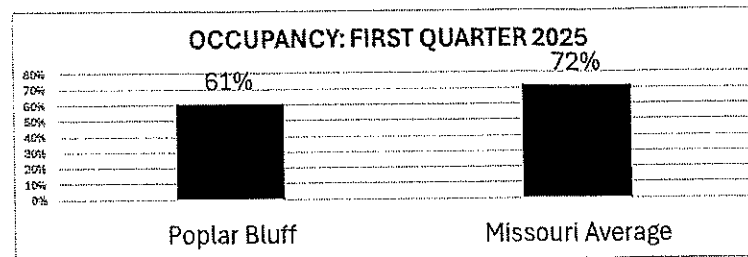
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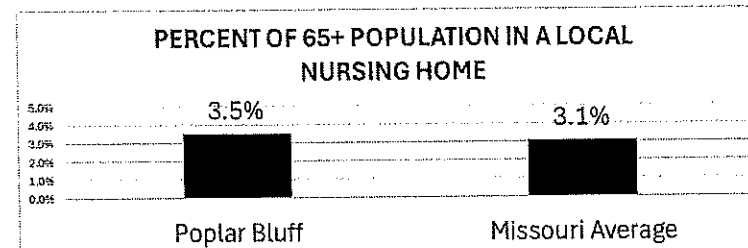
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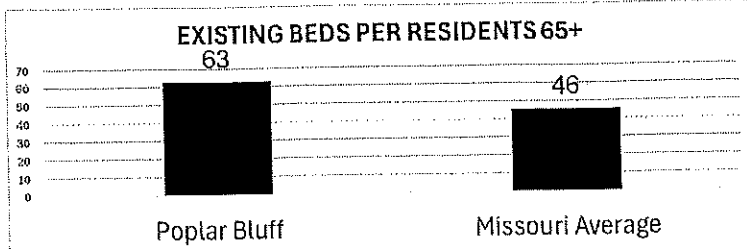
our nursing home is already a quality home. we have a great home we have a great staffed home we don't need another one

Name and Relationship to Westwood Hills *Anna Thomas, CNA*

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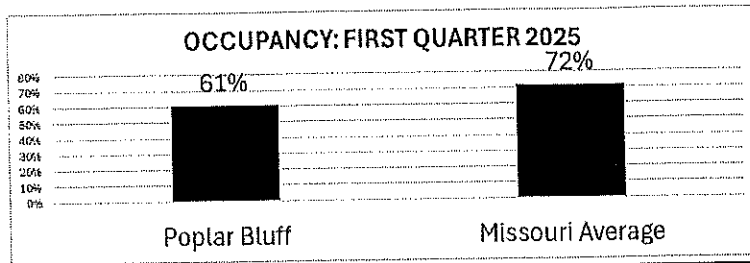
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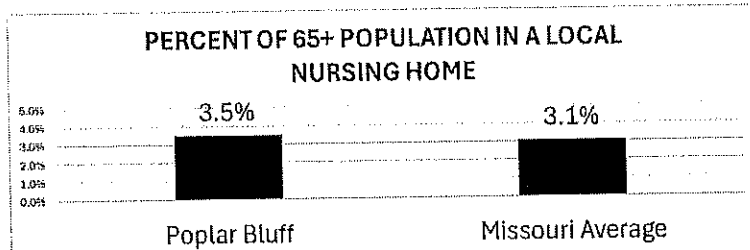
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There would be detrimental outcomes to the local nursing homes if a Con is granted for a new nursing home in Poplar Bluff, Mo. Not only is there more than 200 vacant beds, there is great difficulty to keep the nursing homes staffed. Building another nursing home will just make staffing more difficult. Please consider the challenges the surrounding homes would face.

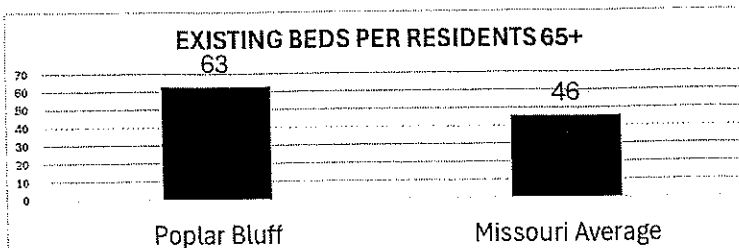
Name and Relationship to Westwood Hills:

D. Fitzwater, RN - ADON

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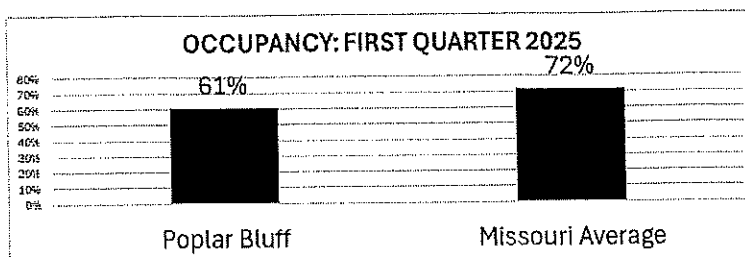
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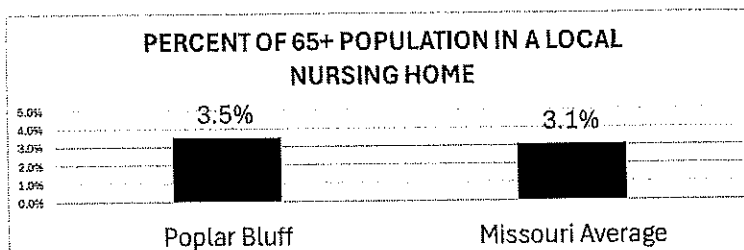
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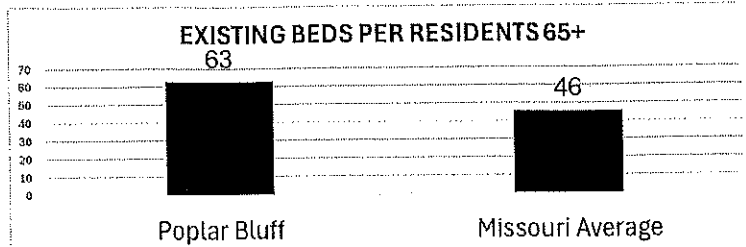
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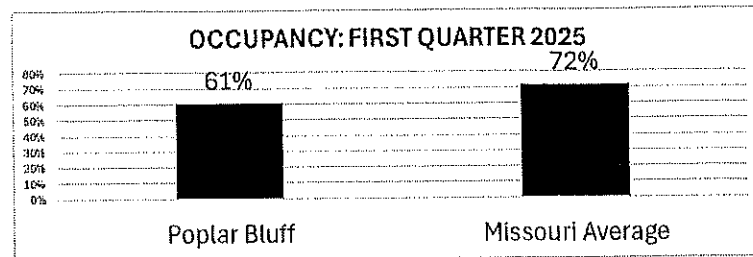
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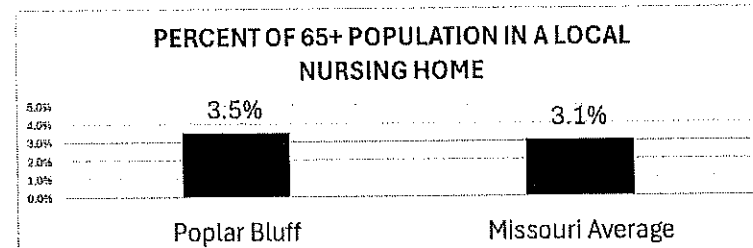
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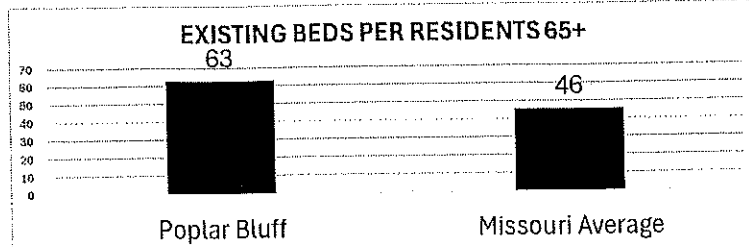
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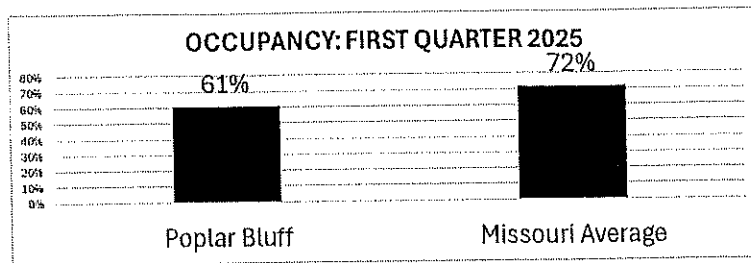
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YES! Poplar Bluff has way more nursing home beds than is normal!



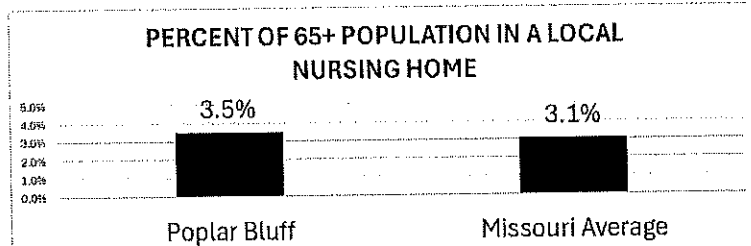
ARE THE EXISTING BEDS MOSTLY FILLED?

NO! The existing homes have more than 200 unfilled beds, putting occupancy at just over 60%, compared to the state average of 72%.



ARE THE BEDS EMPTY BECAUSE PEOPLE THINK THE EXISTING HOMES ARE UNDESIRABLE?

NO! Citizens 65+ in Poplar Bluff are **more likely** to choose a local nursing home, not less.



DO THE EXISTING NURSING HOMES PROVIDE GOOD QUALITY?

YES! The existing homes have 132 beds rated the maximum 5 stars by CMS for Quality Measures, and more than 200 beds rated 3 or more stars. Over 60 of them are unoccupied.

CMS QUALITY RATINGS	Total	Available Today!
Rated 5 stars	132	62
Rated 3+ stars	202	67

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Bringing a new Nursing Home into the area could affect our nursing home and the ones surrounding. Westwood Hills provides great quality care to our residents.

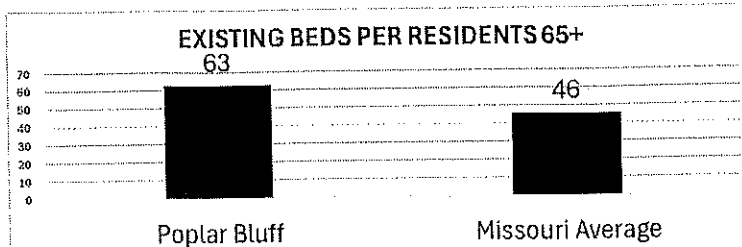
Name and Relationship to Westwood Hills:

C. Calhoun, cna

POPLAR BLUFF NURSING HOME FACT SHEET

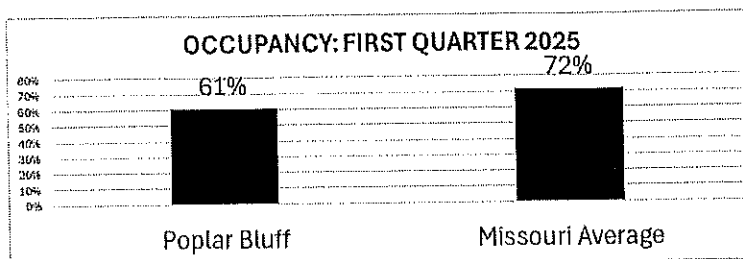
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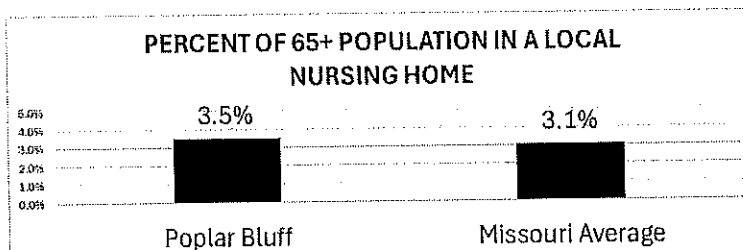
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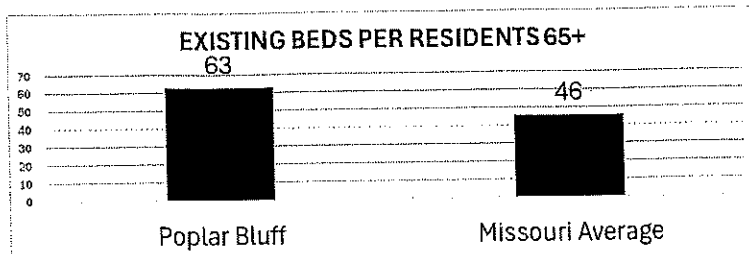
Name and Relationship to Westwood Hills:

Avrie Douglas Housekeeper

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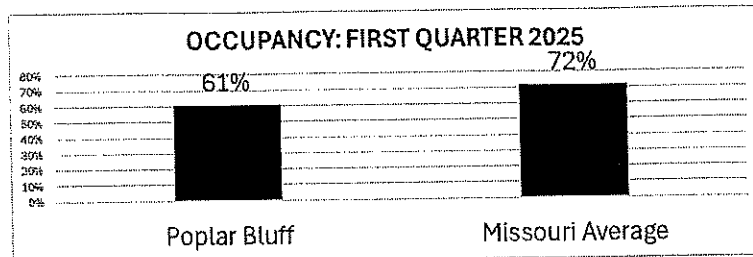
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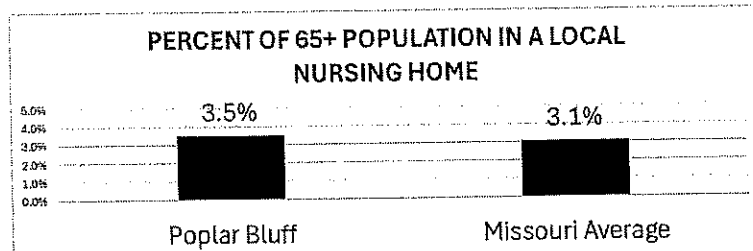
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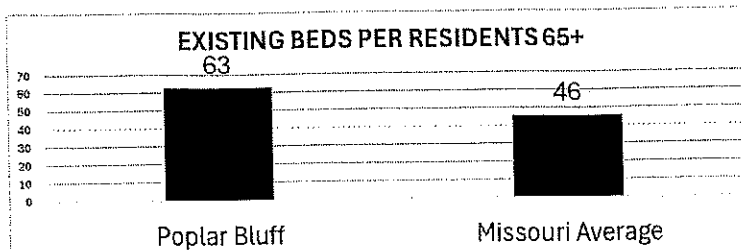
*Sierra Fox, Sierra have been employed 2 years and do not want to see a new nursing home in town
→ we would like to keep our jobs ←*

Name and Relationship to Westwood Hills: *Laundry*

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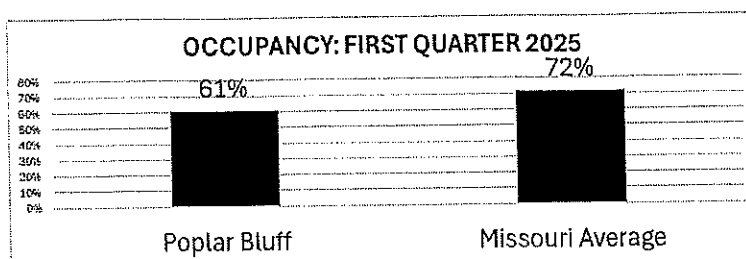
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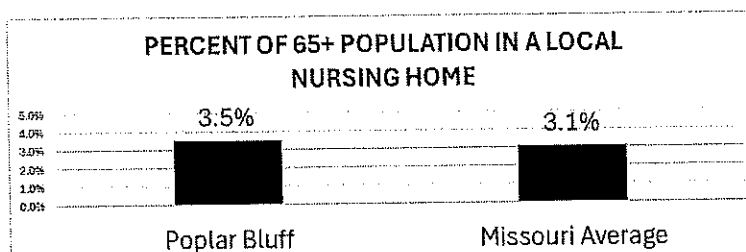
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I don't see any purpose for a new home.

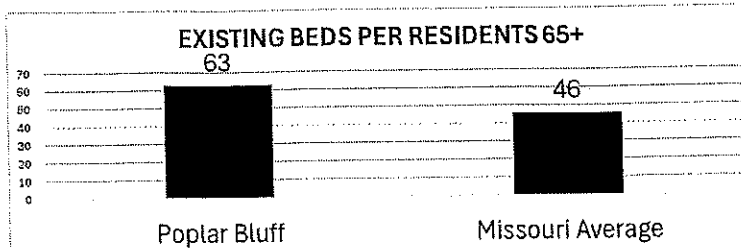
Name and Relationship to Westwood Hills:

Barbara Malcom housekeeping/cook

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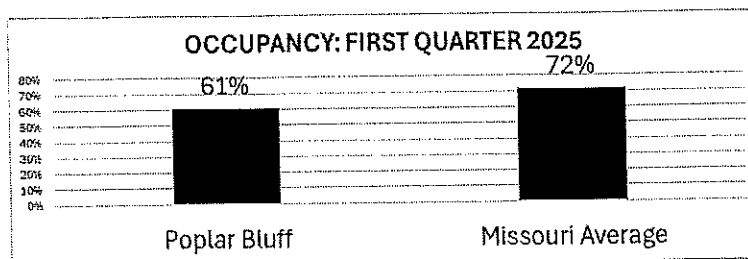
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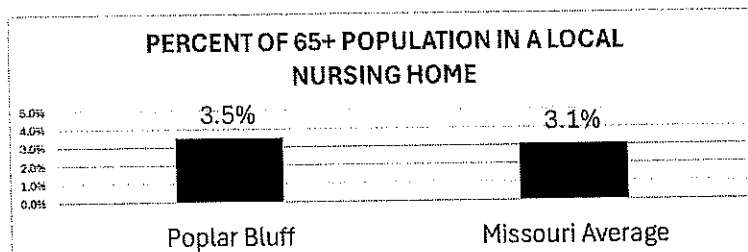
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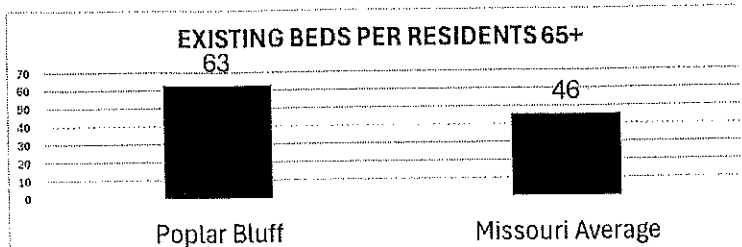
There are already several well established nursing homes/assisted living facilities in this area. Adding another will likely spread staffing even more thin than it currently is. This will cause a potential of inadequate care across the community. The homes currently in existence can't stay full due to the increasing population choosing to keep their family members at home. Having even more beds to fill seems to be a waste of resources better used in other areas

Name and Relationship to Westwood Hills: *K. Collins RN - Westwood Hills Nurse*

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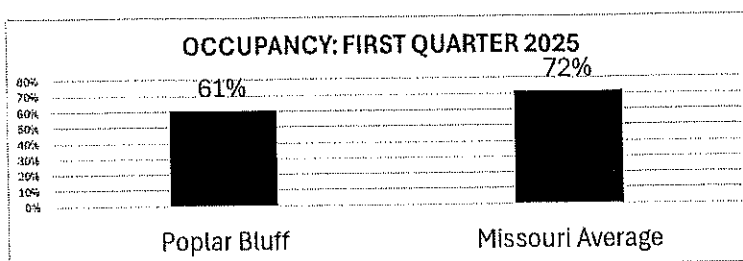
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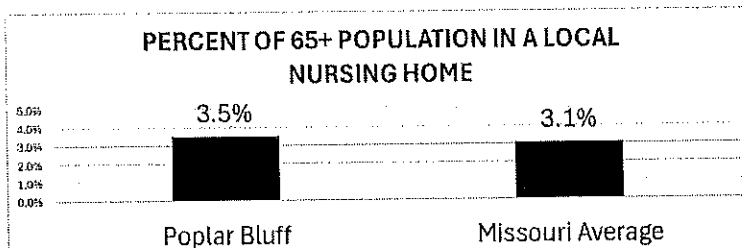
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I have been @ Westwood Hills for 18 yrs and see absolutely no reason why another Nursing Home would benefit our Area.

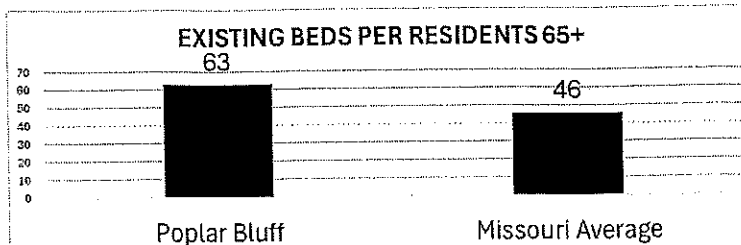
Name and Relationship to Westwood Hills

Brenda Long / Environmental Supervisor

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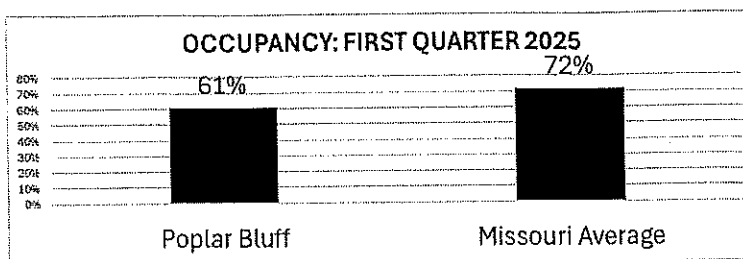
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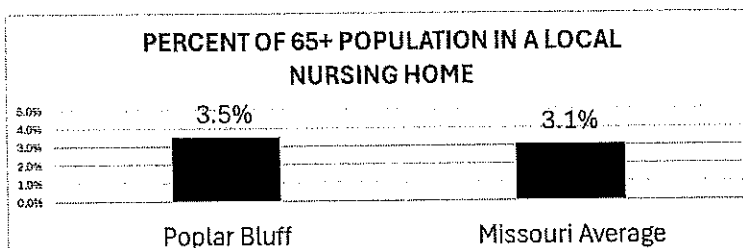
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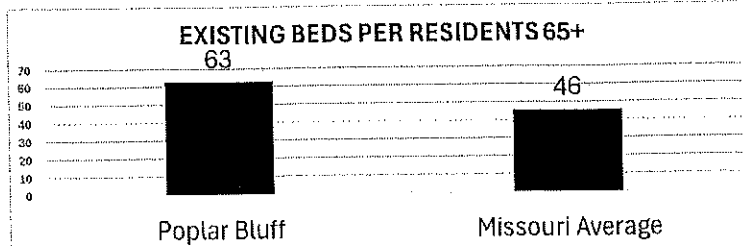
I, Alfreda I Coan, have been employed at W.W. H.H. CC since 2-21-1986 39 years. I feel we do not need any more health care facility in Poplar Bluff Mo.

Name and Relationship to Westwood Hills: Alfreda I Coan House Keeping

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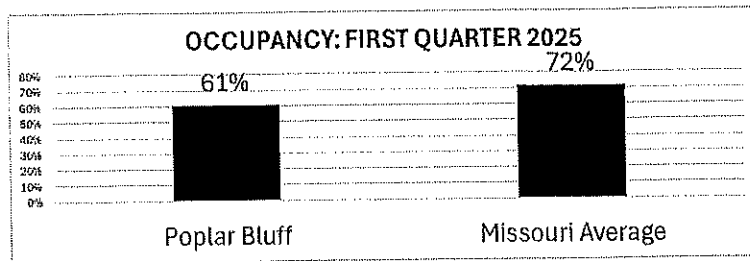
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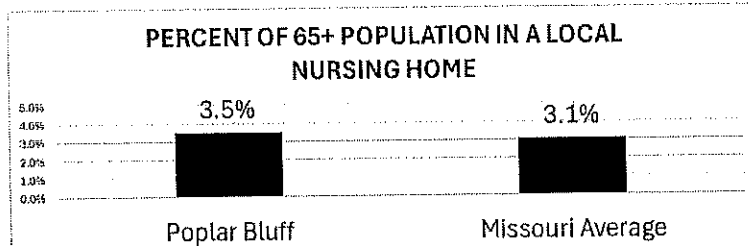
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I love being apart of this team. This is the best place. ♡

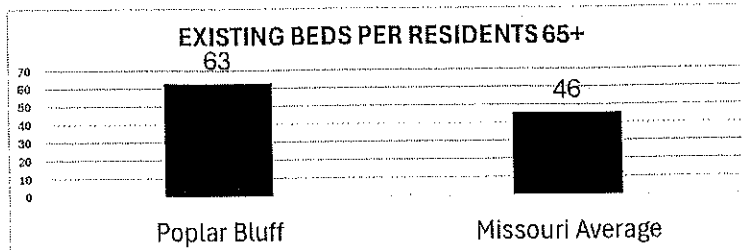
Name and Relationship to Westwood Hills:

Brittany Brown Laundry Cook, Housekeeper!

POPLAR BLUFF NURSING HOME FACT SHEET

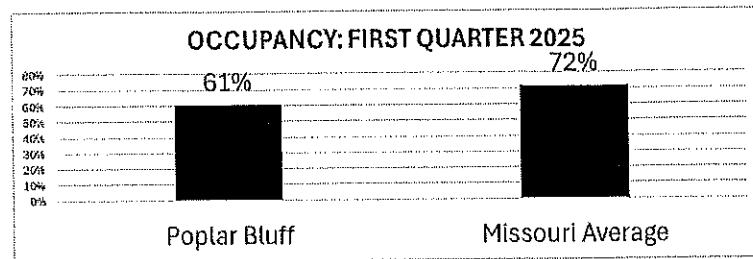
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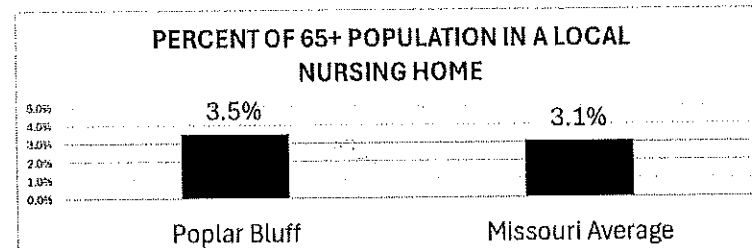
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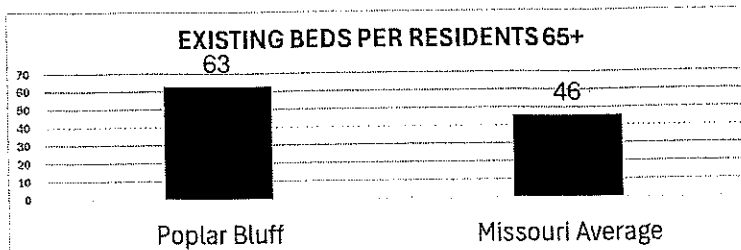
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P. Bogan CNA

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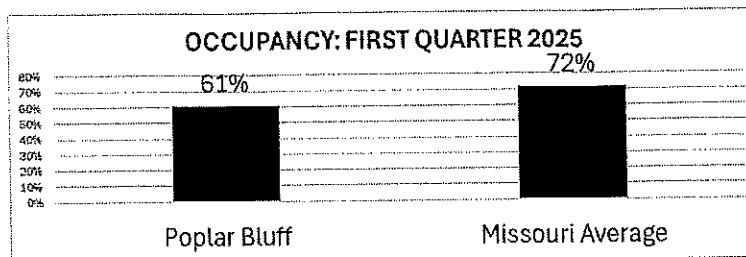
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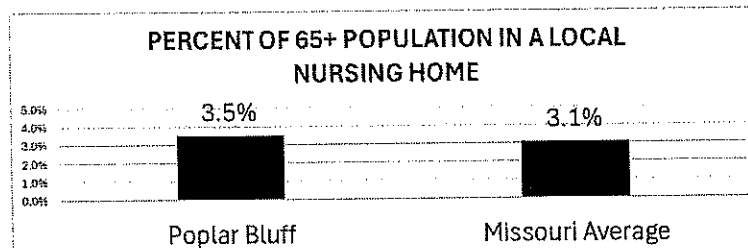
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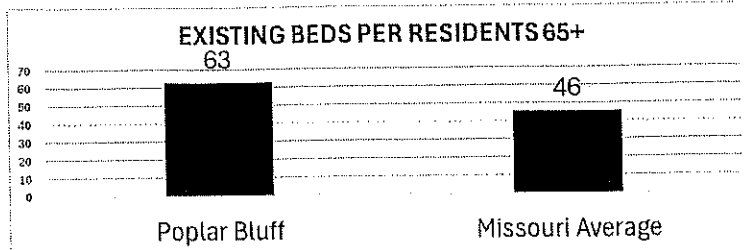
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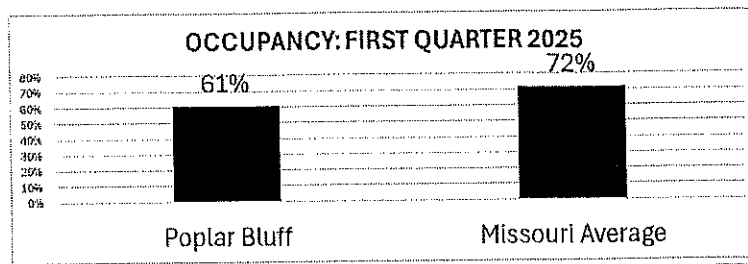
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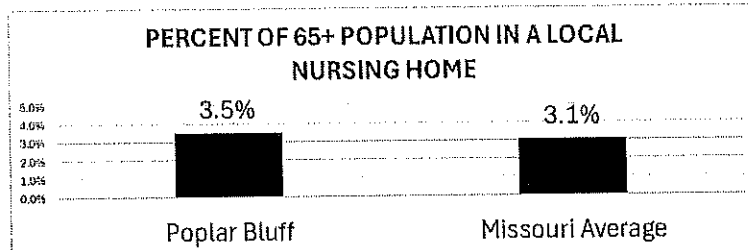
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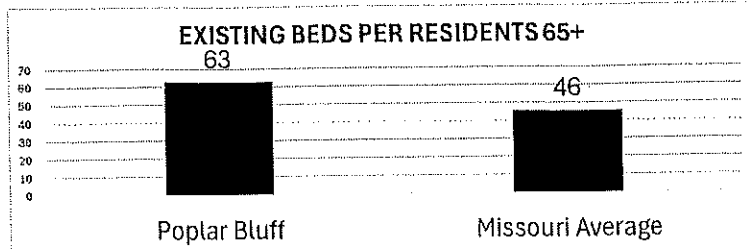
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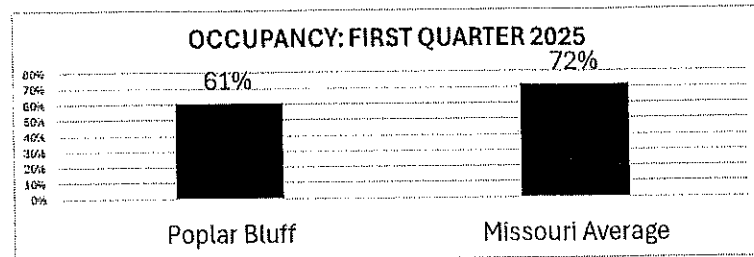
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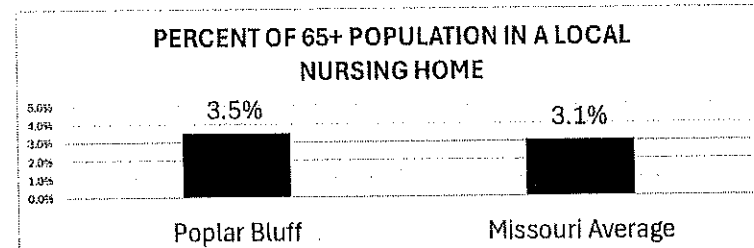
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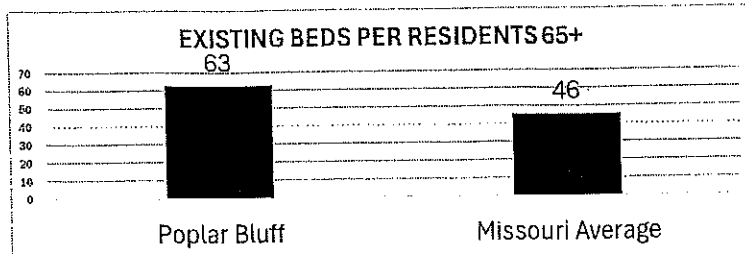
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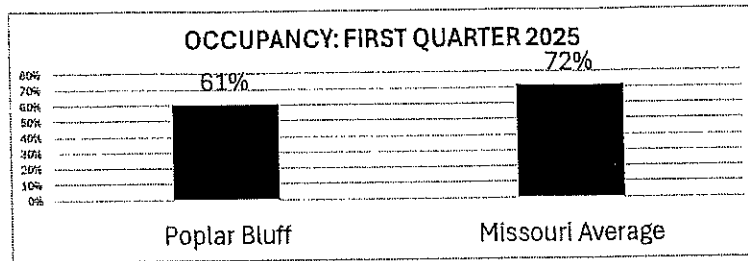
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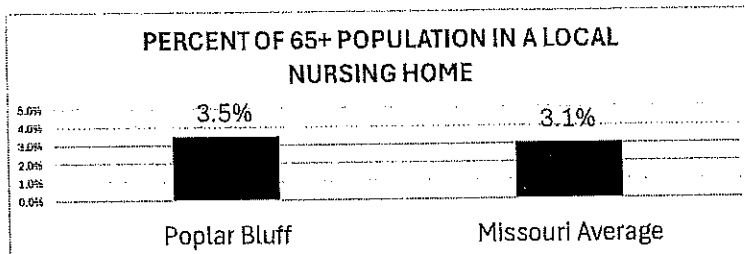
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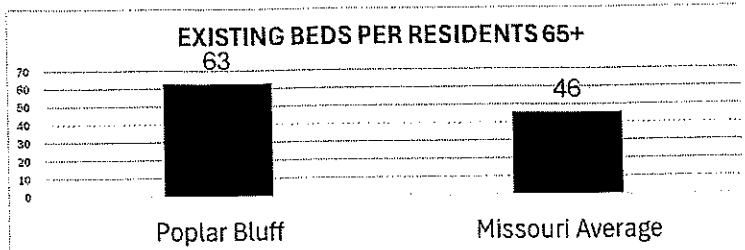
William Jackson

Name and Relationship to Westwood Hills: _____

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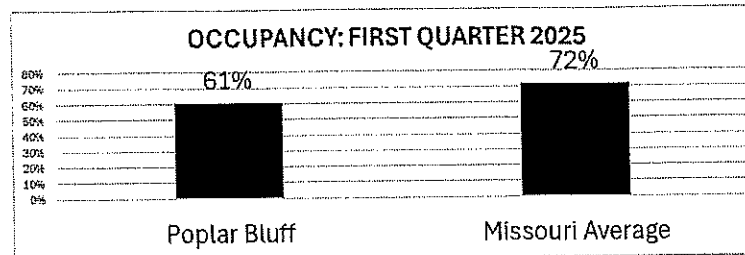
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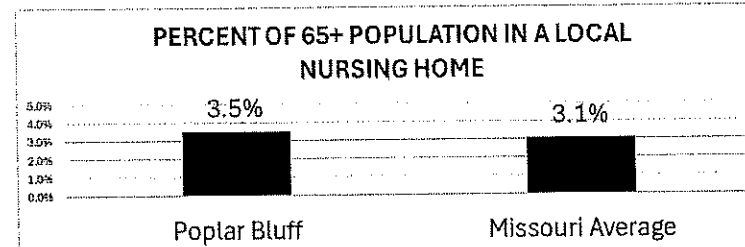
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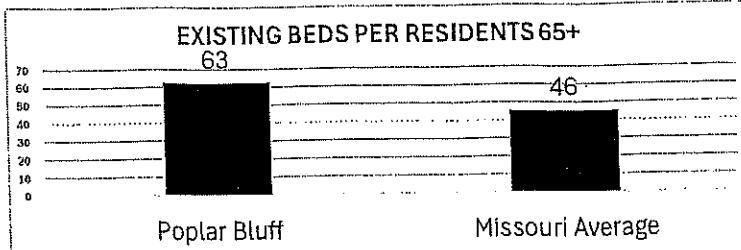
Westwood Hills is a quality nursing home where the staff take pride in providing a home atmosphere where every resident feels safe and loved.

Name and Relationship to Westwood Hills: *RN night shift Amy K...*

POPLAR BLUFF NURSING HOME FACT SHEET

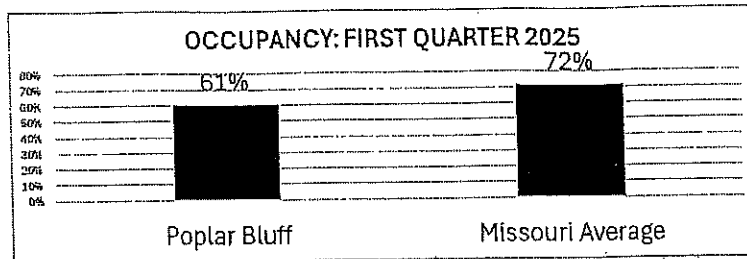
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YES! Poplar Bluff has way more nursing home beds than is normal!



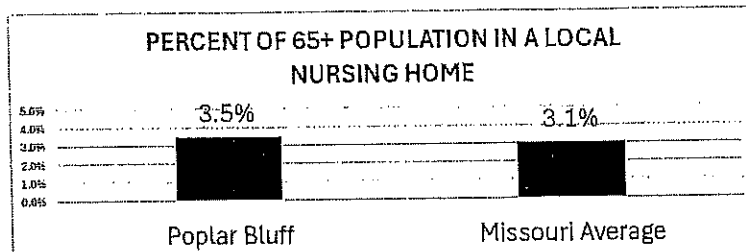
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NO! Citizens 65+ in Poplar Bluff are **more likely** to choose a local nursing home, not less.



DO THE EXISTING NURSING HOMES PROVIDE GOOD QUALITY?

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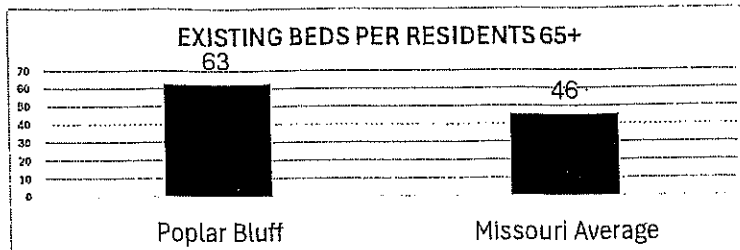
Name and Relationship to Westwood Hills:

Walter Johnson, family member

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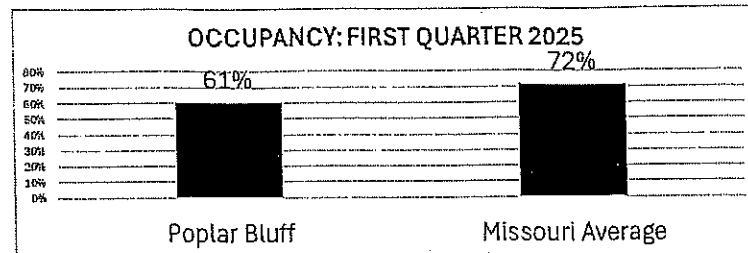
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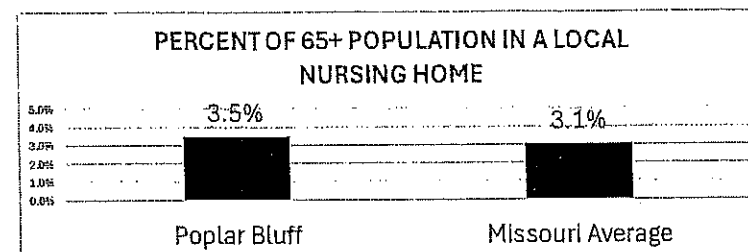
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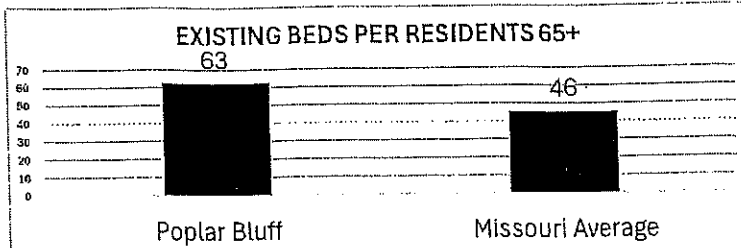
Name and Relationship to Westwood Hills:

Jesse Brooks - CNA

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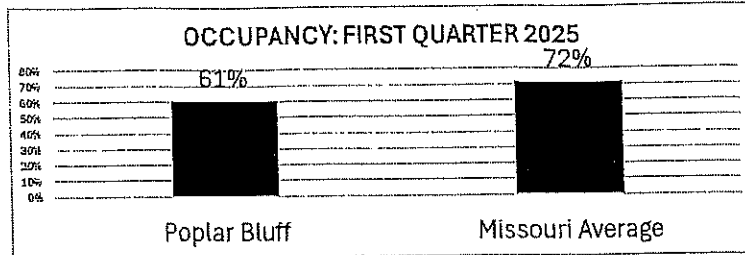
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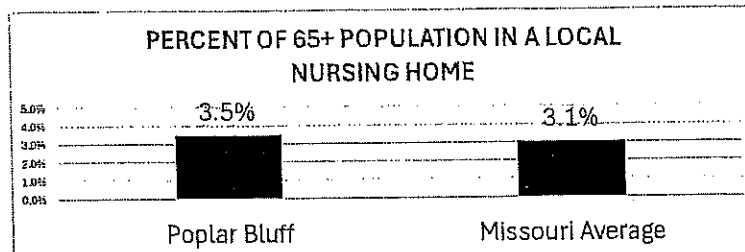
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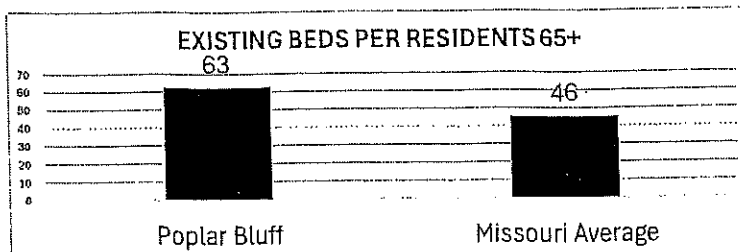
Name and Relationship to Westwood Hills:

Jim Barkley

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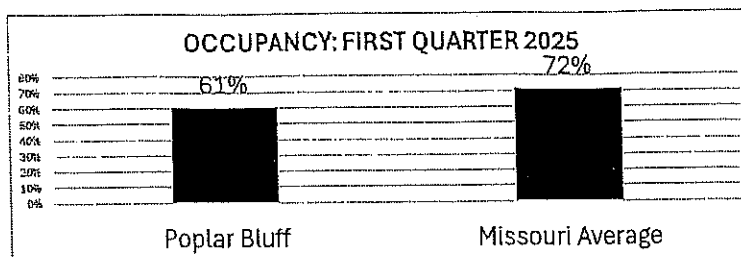
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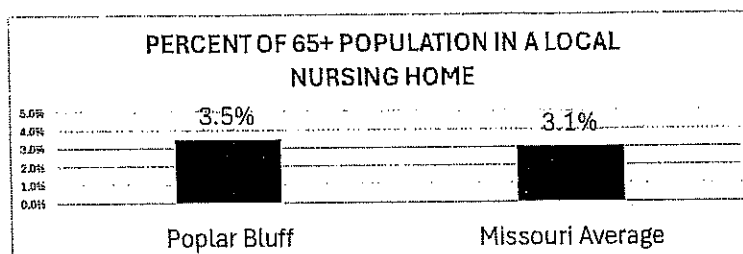
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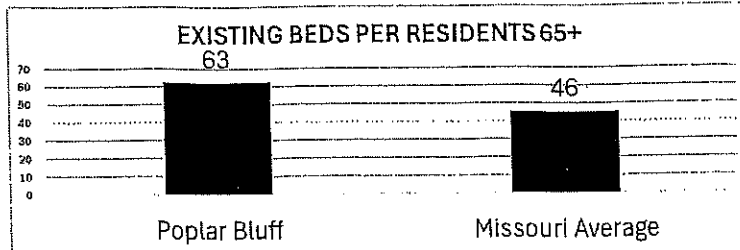
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Name and Relationship to Westwood Hills: CNA

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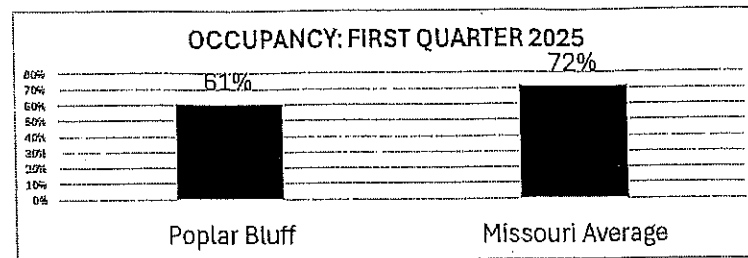
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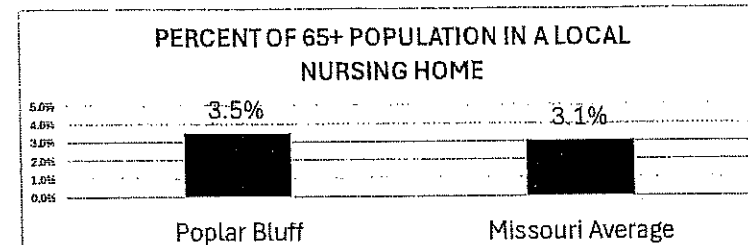
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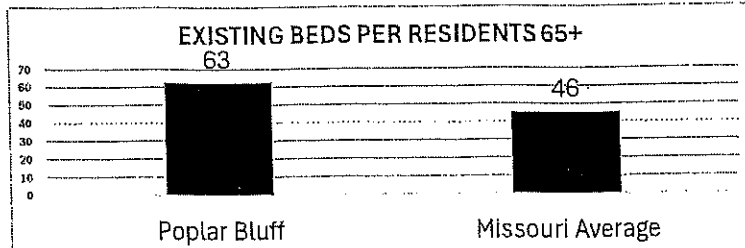
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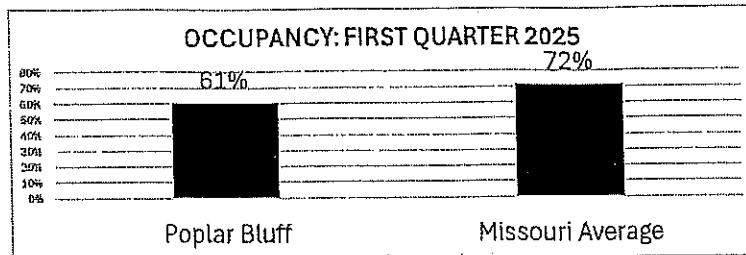
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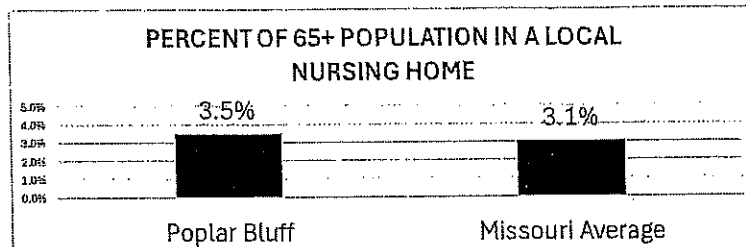
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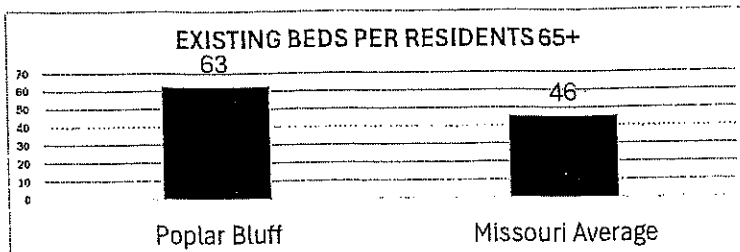
Name and Relationship to Westwood Hills:

Jessie Kellogg CNA

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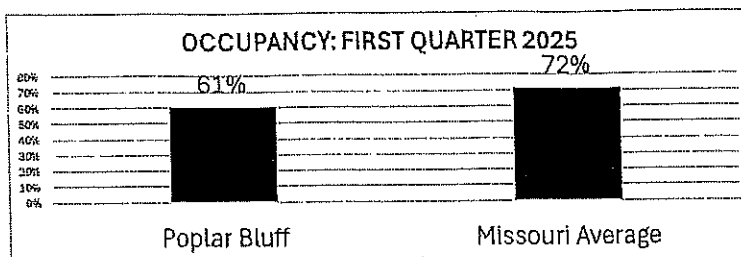
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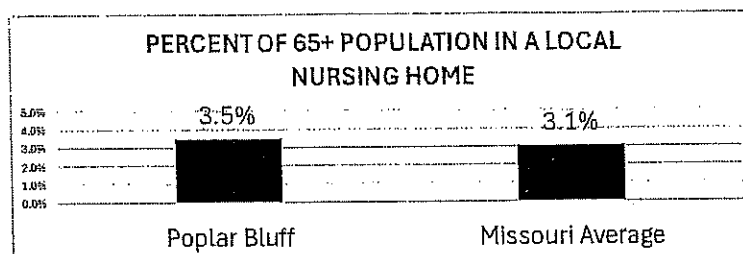
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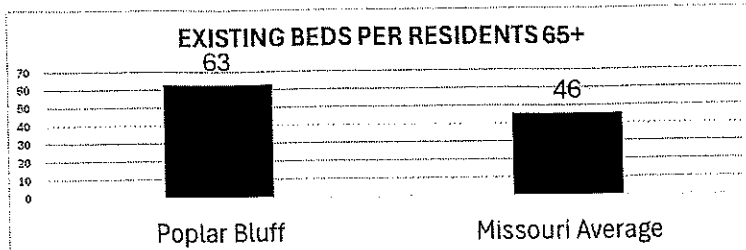
Name and Relationship to Westwood Hills:

Paula Phillips

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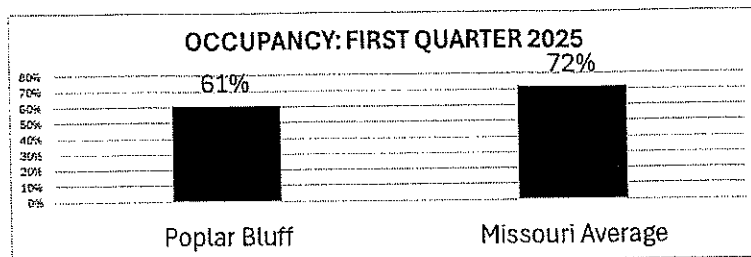
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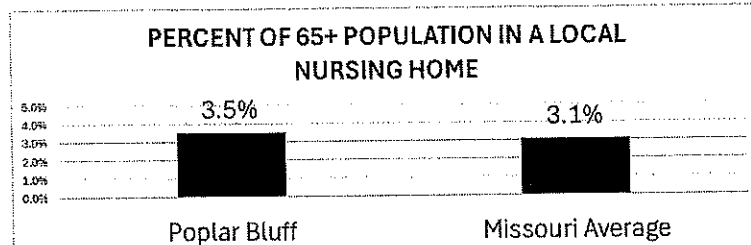
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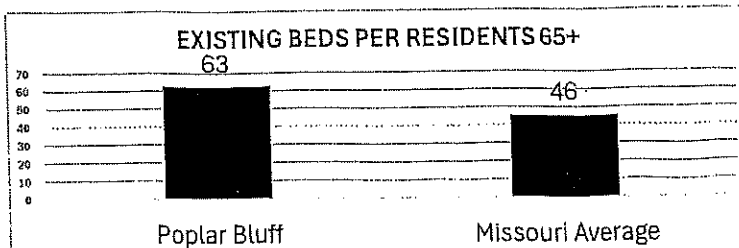
We have a quality home, please don't harm our jobs by allowing another facility

Name and Relationship to Westwood Hills: _____

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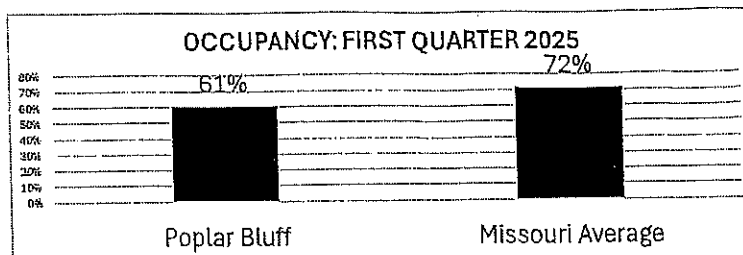
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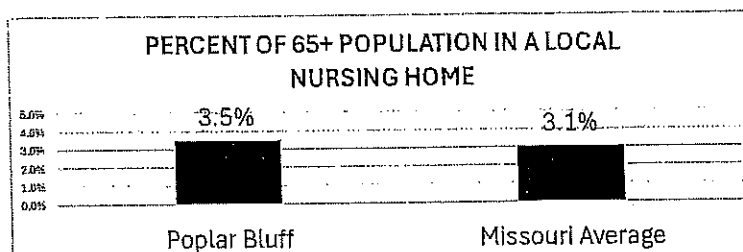
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Tell me why we need another nursing home? Looks like we have plenty of empty beds in Poplar Bluff.

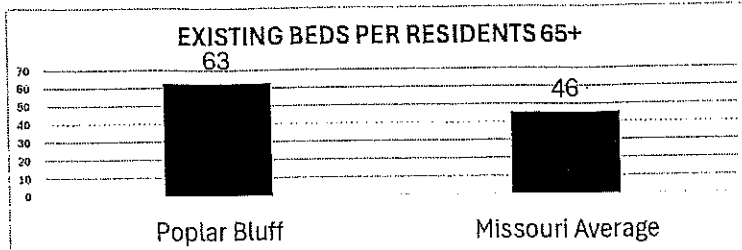
Name and Relationship to Westwood Hills:

Melody Bieri, RN - Employee

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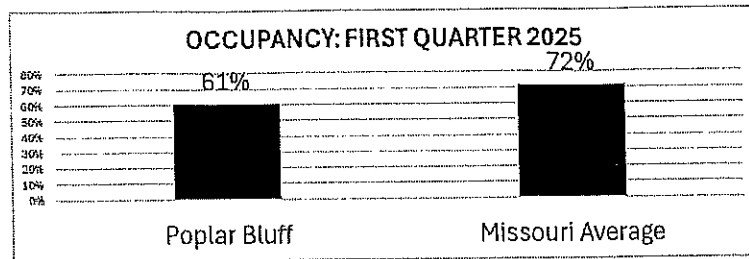
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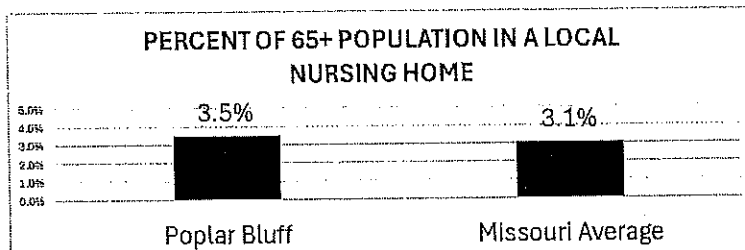
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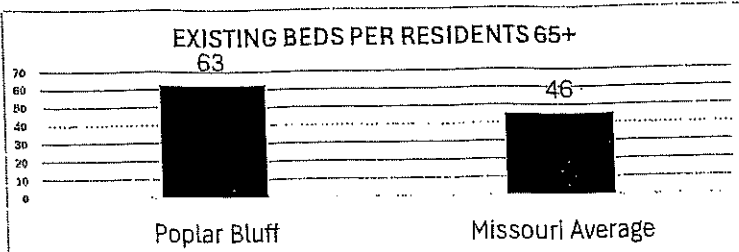
Name and Relationship to Westwood Hills:

Shannon Parker

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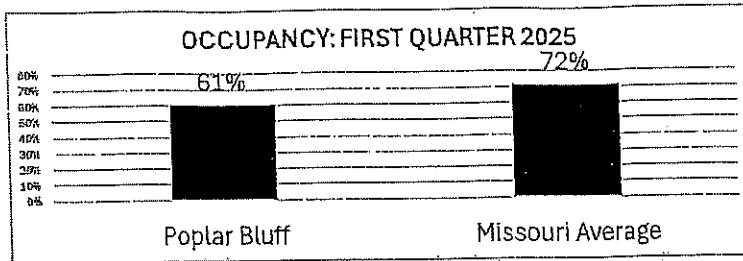
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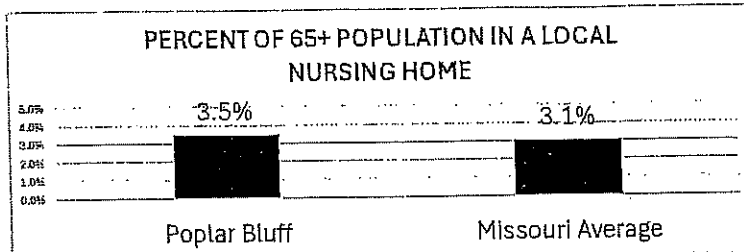
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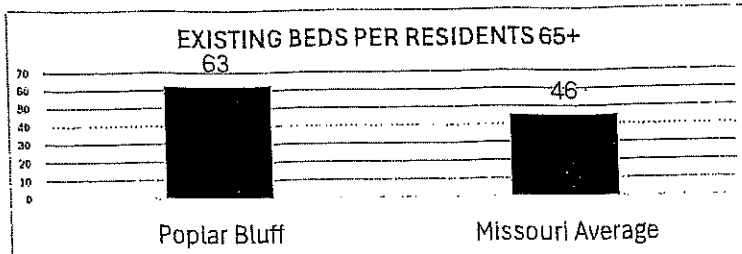
Name and Relationship to Westwood Hills:

Latonna Currie, CNA

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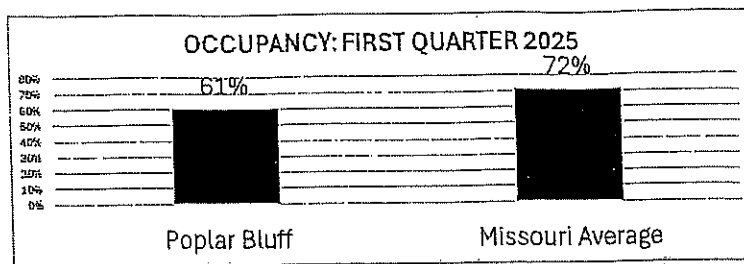
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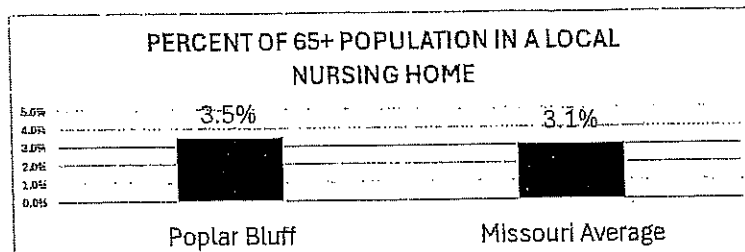
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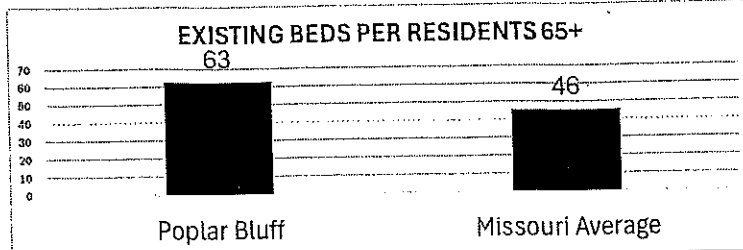
Name and Relationship to Westwood Hills:

Wandra Young, Dietary Aide

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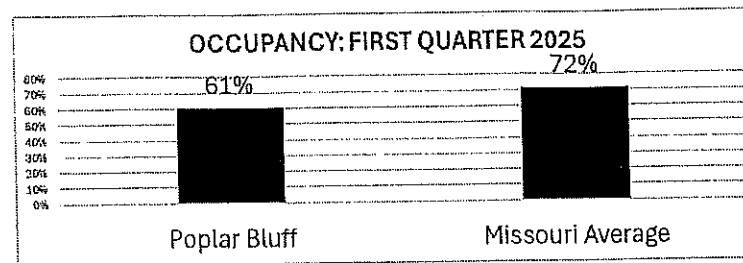
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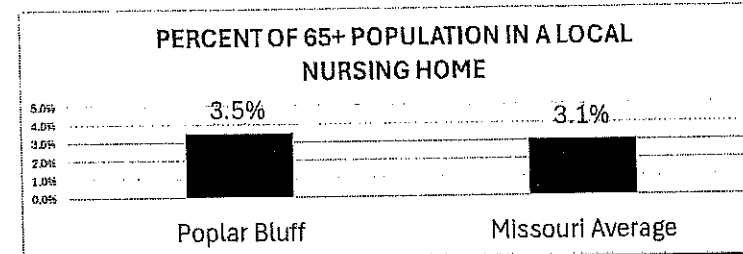
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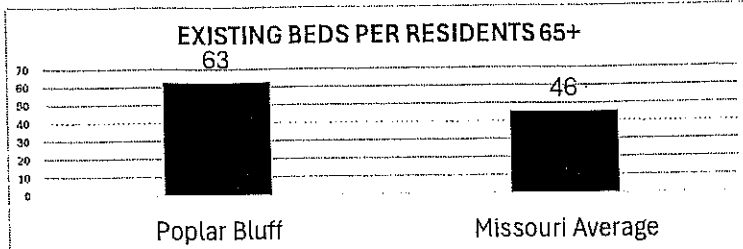
Name and Relationship to Westwood Hills:

Cynthia Wood, Activity Director
worked here for 31 years.

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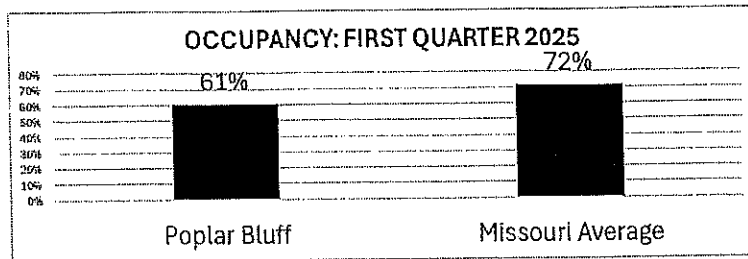
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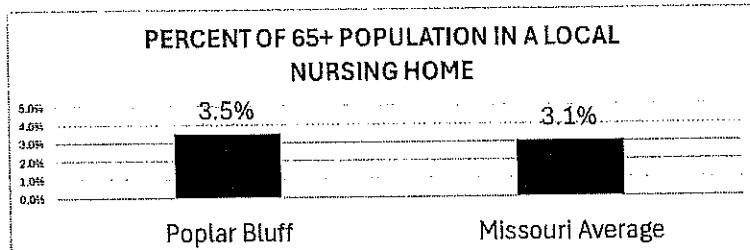
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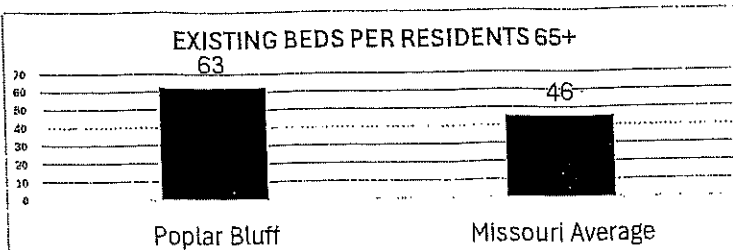
Name and Relationship to Westwood Hills:

Paula C. McMath **RESIDENT**

POPLAR BLUFF NURSING HOME FACT SHEET

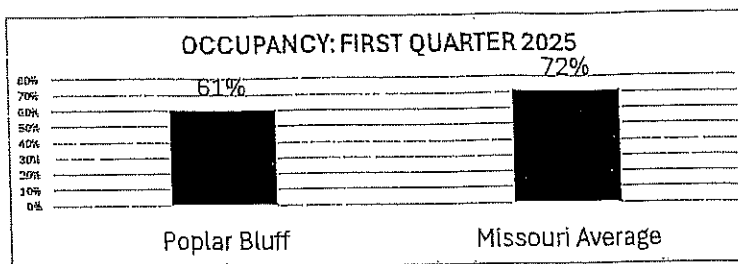
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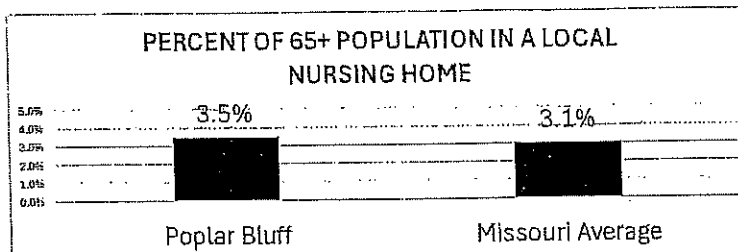
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ARE THE BEDS EMPTY BECAUSE PEOPLE THINK THE EXISTING HOMES ARE UNDESIRABLE?

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DO THE EXISTING NURSING HOMES PROVIDE GOOD QUALITY?

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	Total	Today!
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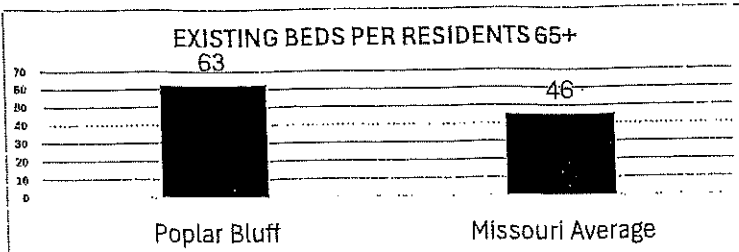
Name and Relationship to Westwood Hills:

Lavonda Hansen
Mother, Henrietta Griffin - resident

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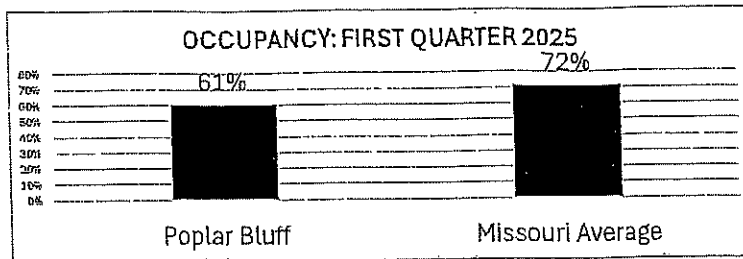
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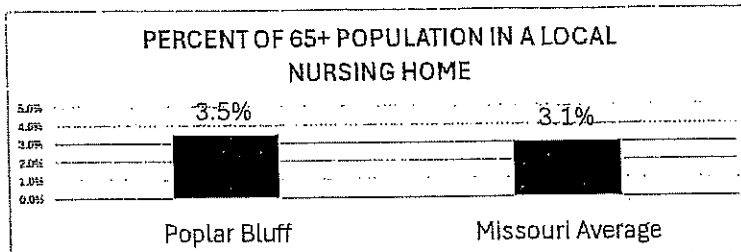
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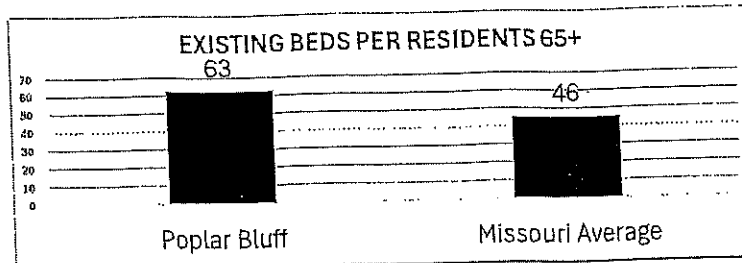
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Name and Relationship to Westwood Hills: Alton Young, resident

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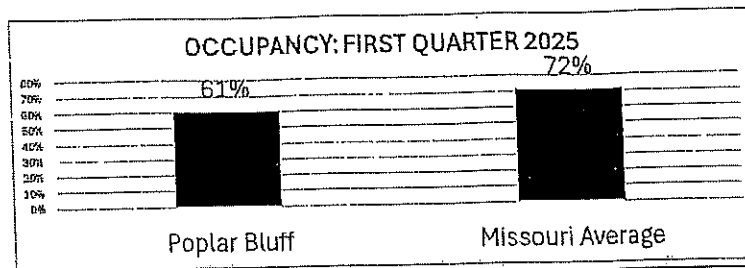
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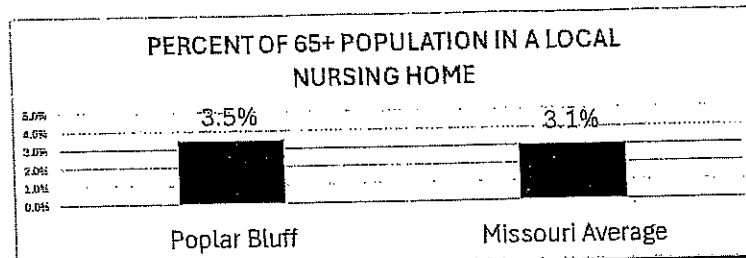
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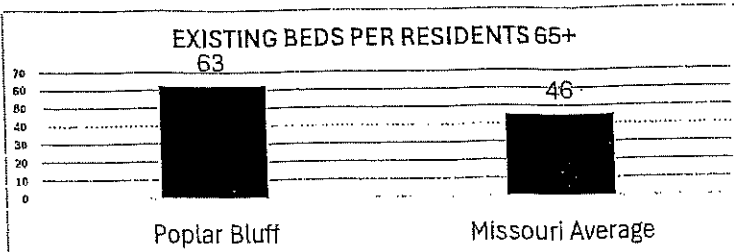
NO

Wanda Murray
family

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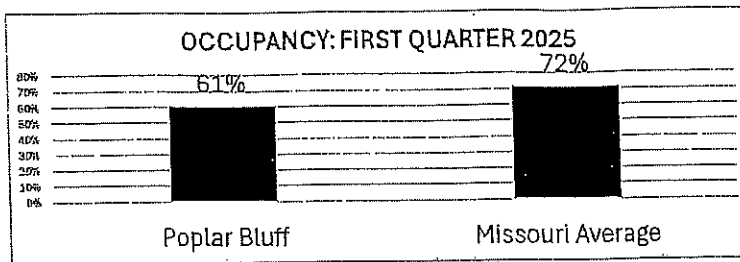
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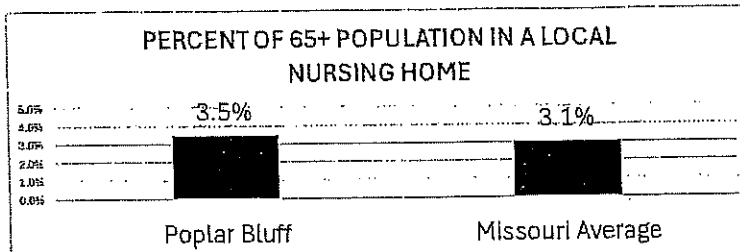
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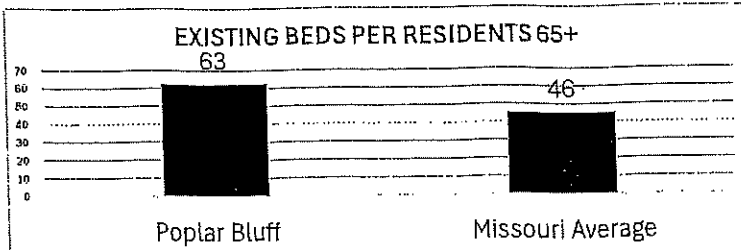
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Name and Relationship to Westwood Hills: Patricia Parsons, resident

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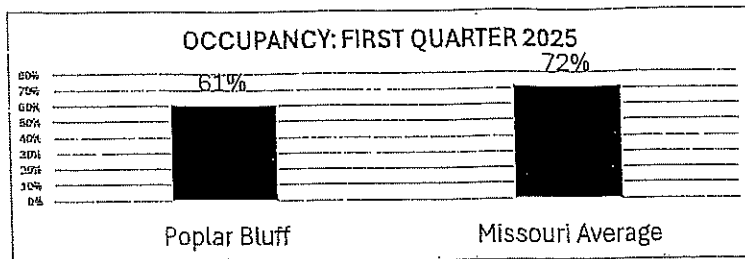
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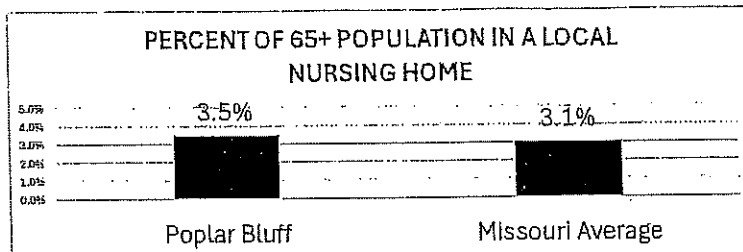
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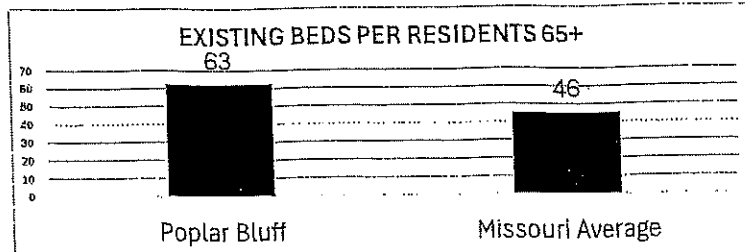
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Name and Relationship to Westwood Hills: Norma White resident

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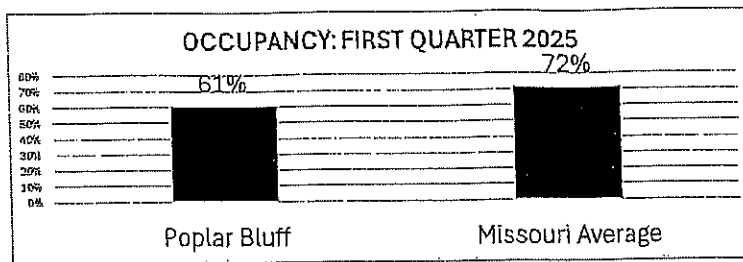
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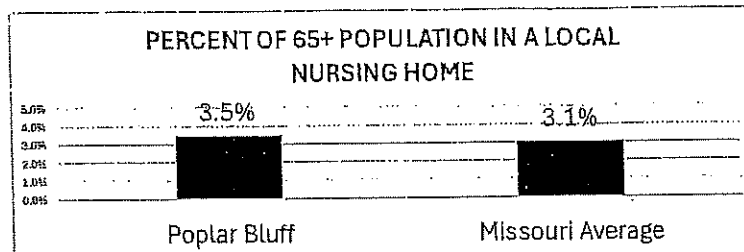
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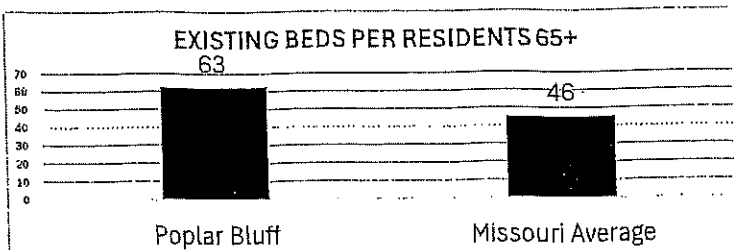
Name and Relationship to Westwood Hills:

Barbara Jones, family

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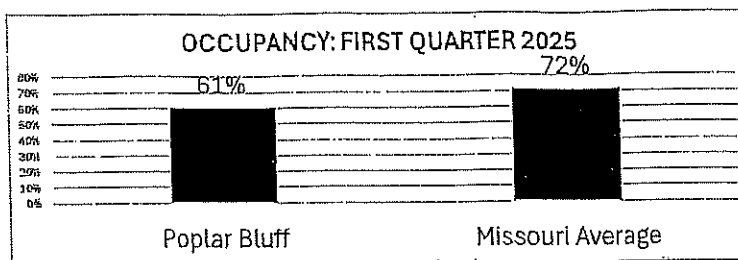
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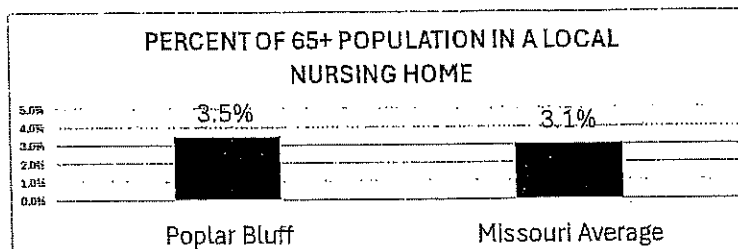
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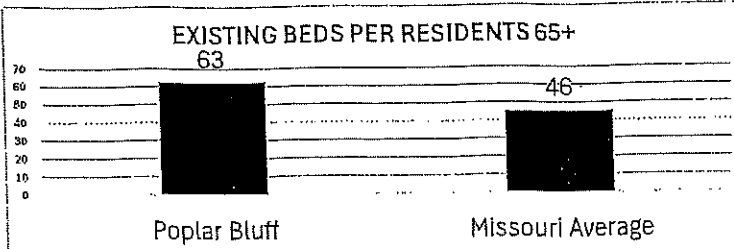
Name and Relationship to Westwood Hills:

Sharon Walker, resident

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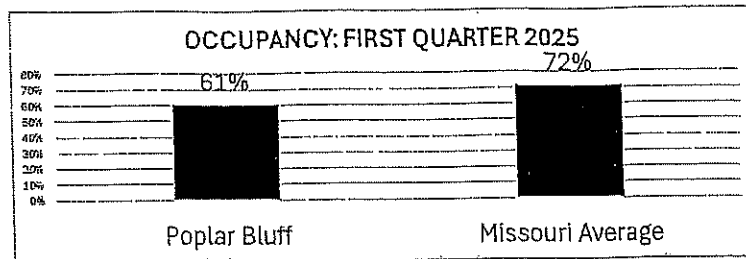
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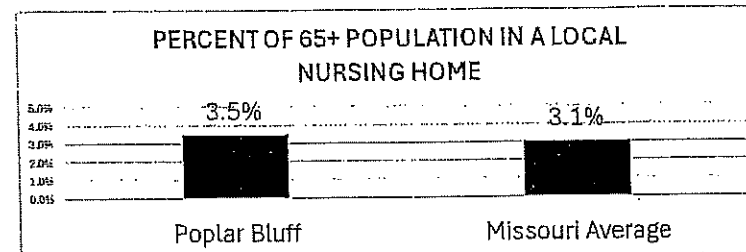
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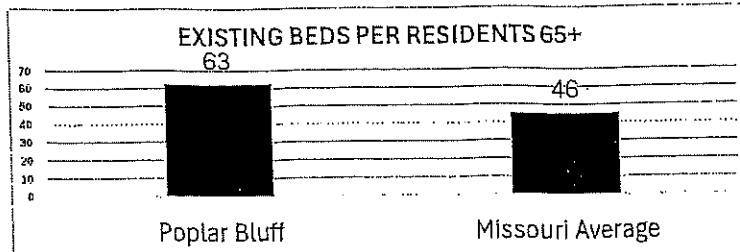
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Name and Relationship to Westwood Hills: Patsy Sullivan, resident

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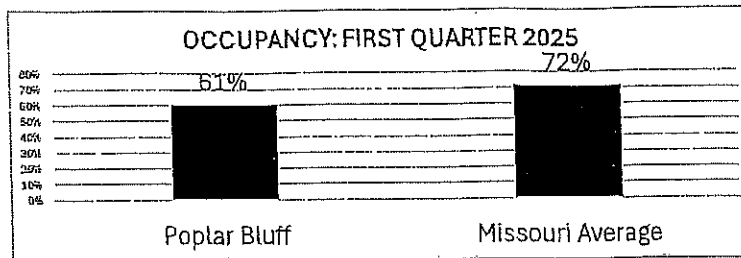
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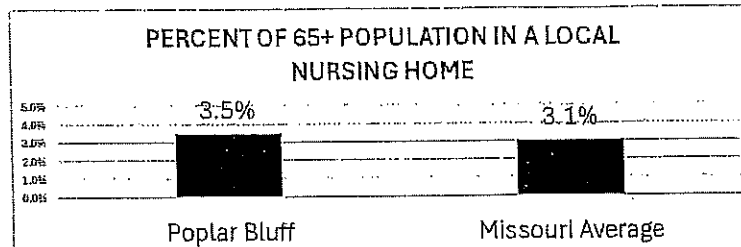
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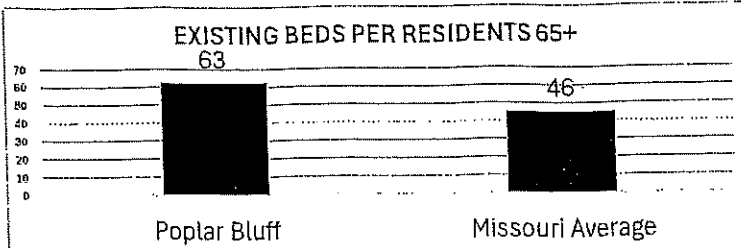
Name and Relationship to Westwood Hills:

Dorothy Mary Vonberg, resident

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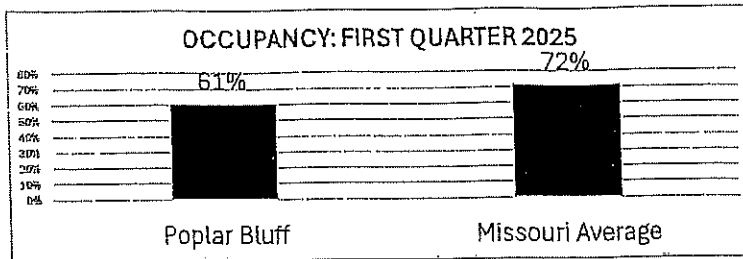
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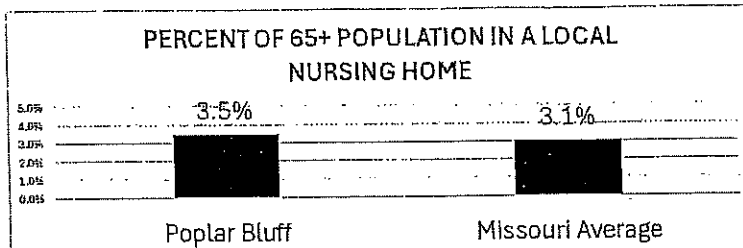
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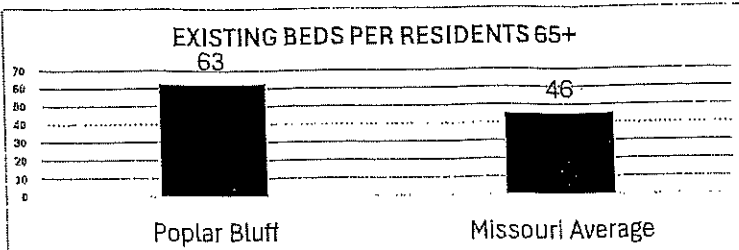
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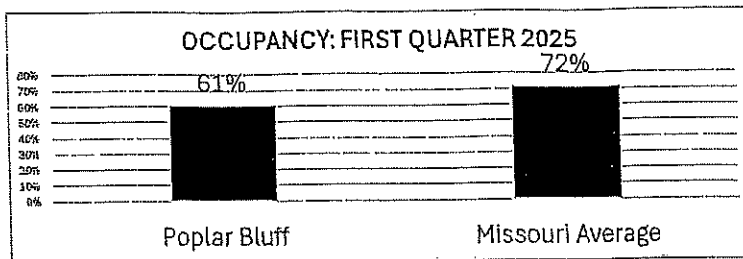
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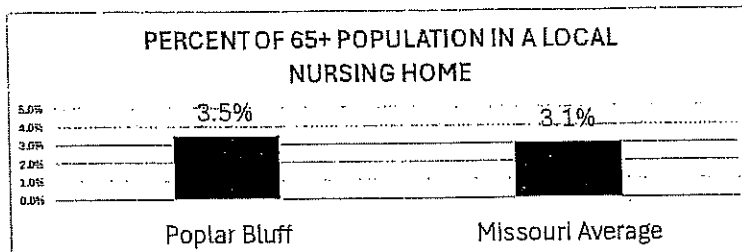
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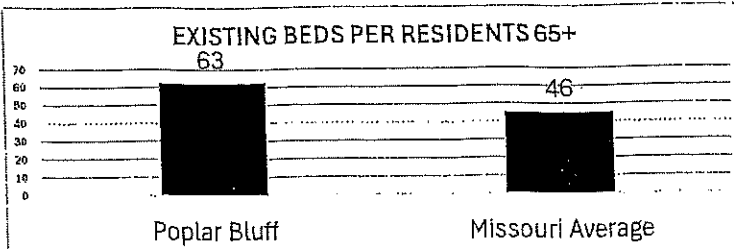
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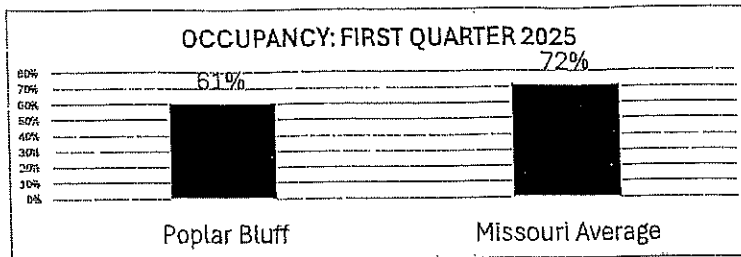
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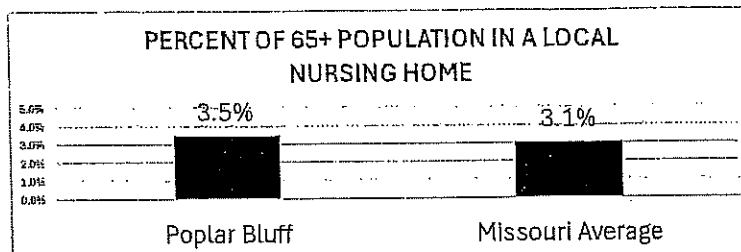
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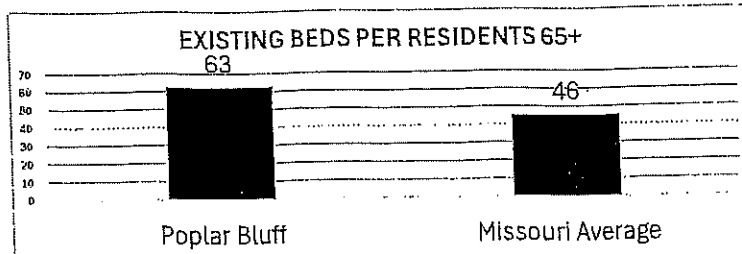
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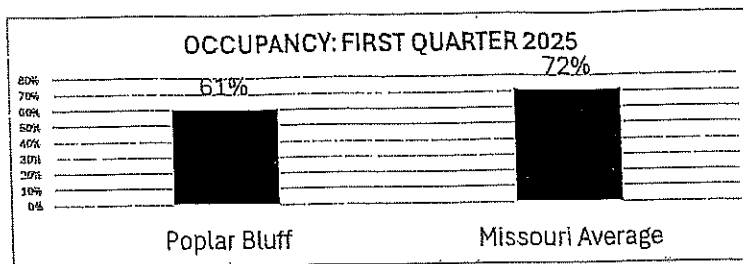
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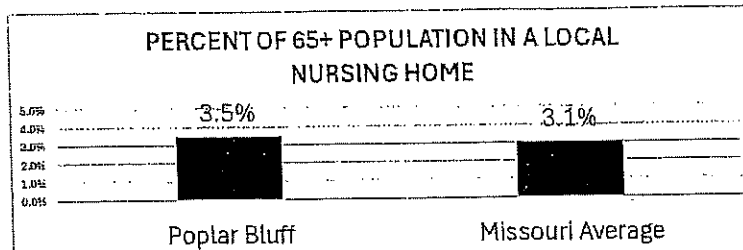
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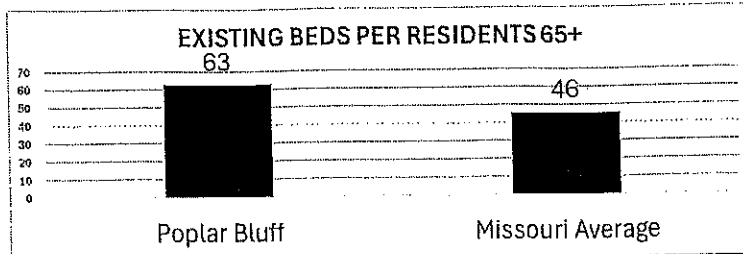
Name and Relationship to Westwood Hills:

Glenn Shippey, resident

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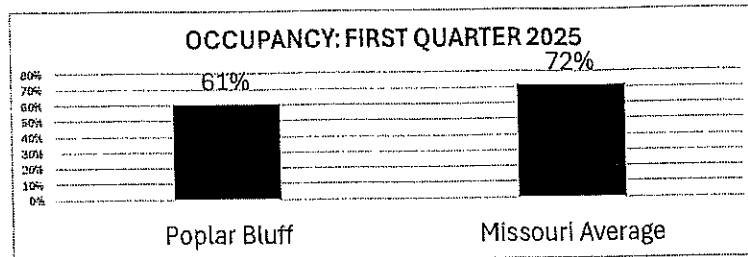
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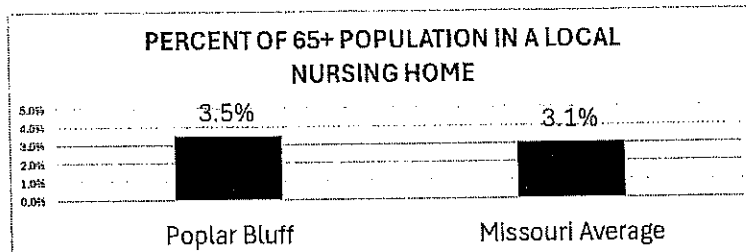
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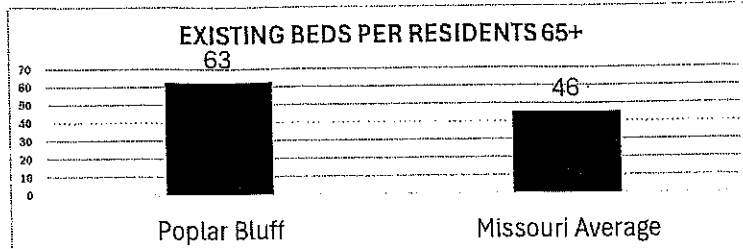
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*Marcia Williams, PTA
Director of Rehab*

POPLAR BLUFF NURSING HOME FACT SHEET

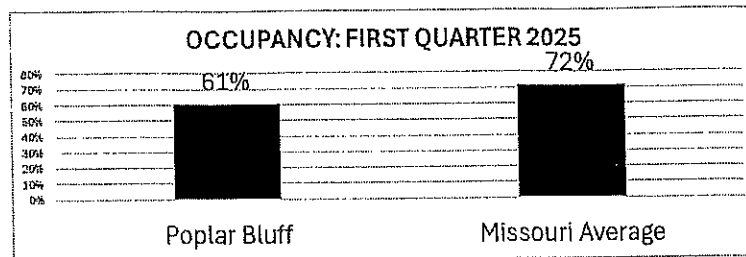
DOES POPLAR BLUFF CURRENTLY HAVE ENOUGH NURSING HOME BEDS?

YES! Poplar Bluff has way more nursing home beds than is normal!



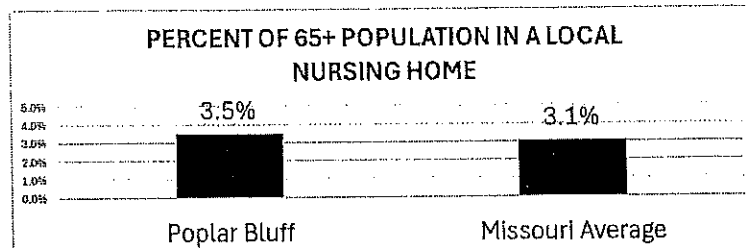
ARE THE EXISTING BEDS MOSTLY FILLED?

NO! The existing homes have more than 200 unfilled beds, putting occupancy at just over 60%, compared to the state average of 72%.



ARE THE BEDS EMPTY BECAUSE PEOPLE THINK THE EXISTING HOMES ARE UNDESIRABLE?

NO! Citizens 65+ in Poplar Bluff are more likely to choose a local nursing home, not less.



DO THE EXISTING NURSING HOMES PROVIDE GOOD QUALITY?

YES! The existing homes have 132 beds rated the maximum 5 stars by CMS for Quality Measures, and more than 200 beds rated 3 or more stars. Over 60 of them are unoccupied.

CMS QUALITY RATINGS	Total	Available Today!
Rated 5 stars	132	62
Rated 3+ stars	202	67

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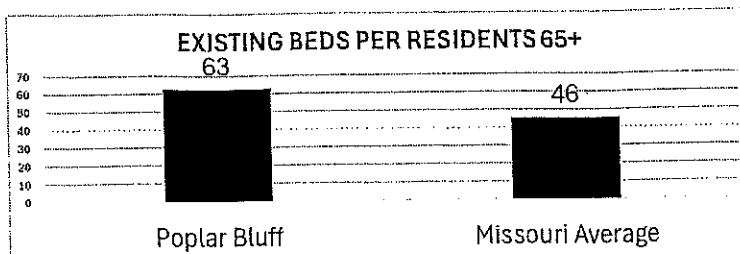
Name and Relationship to Westwood Hills:

Mazan Gof, DPT

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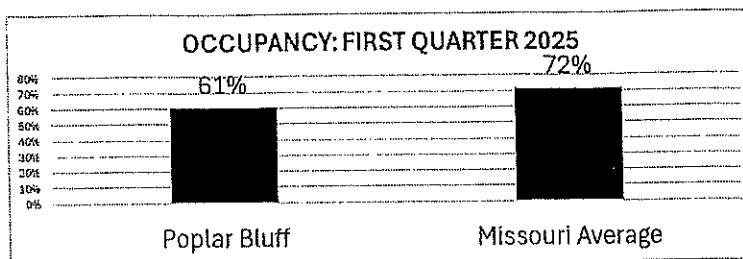
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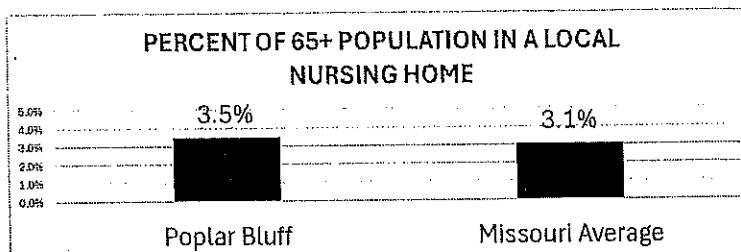
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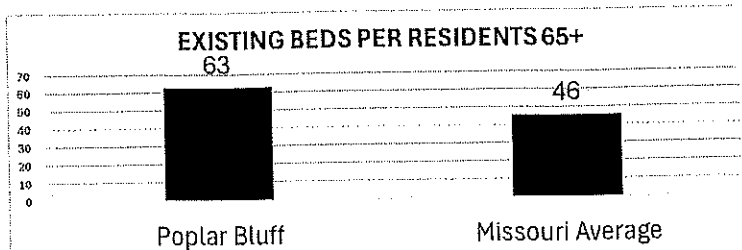
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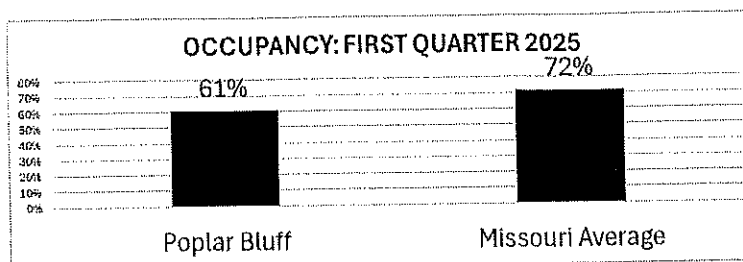
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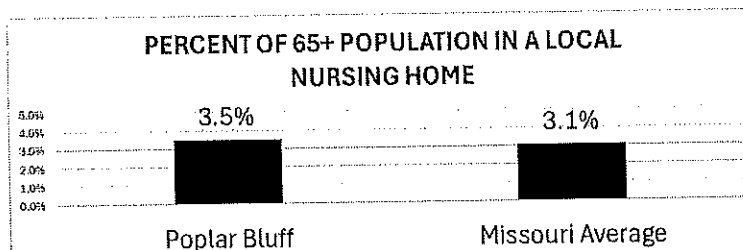
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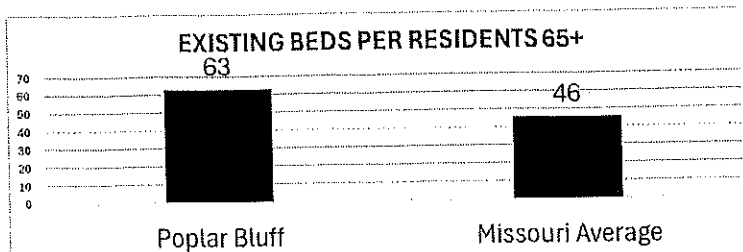
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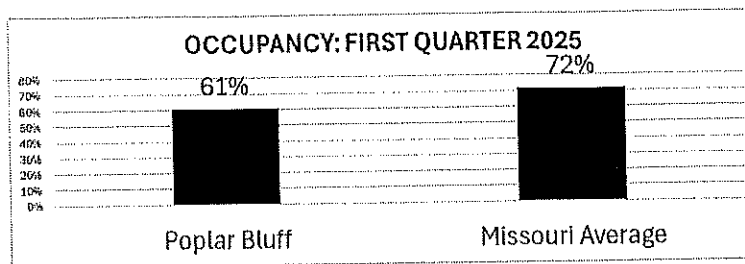
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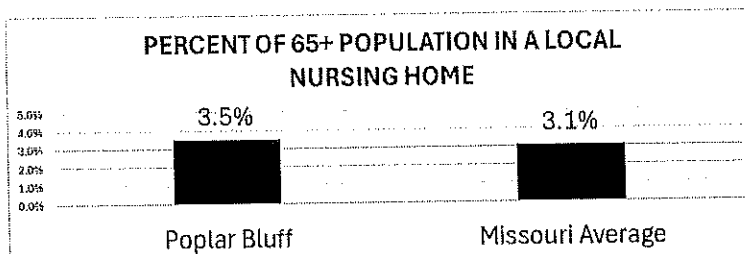
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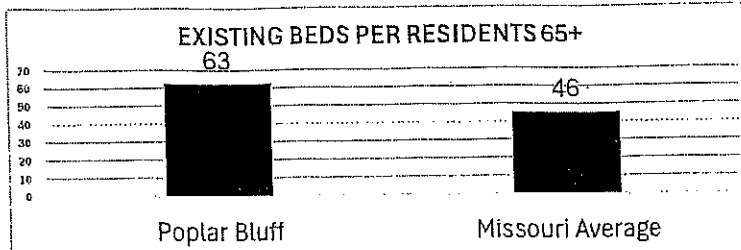
Name and Relationship to Westwood Hills:

Kim Bender

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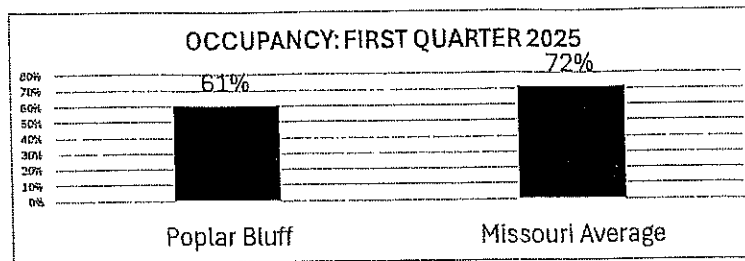
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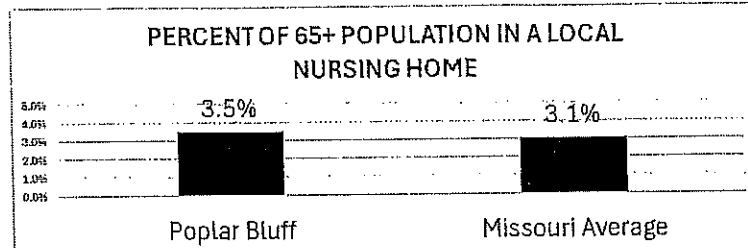
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There is no need for another nursing facility in Poplar Bluff, there are amazing facilities here and operating. Westwood is a 5 star and gives amazing care. The facilities here all have and have had ties to the community and they would do nothing to help but hurt them!

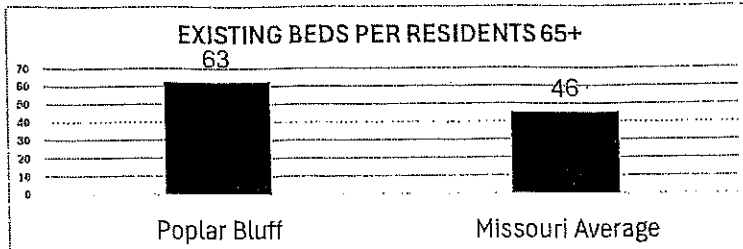
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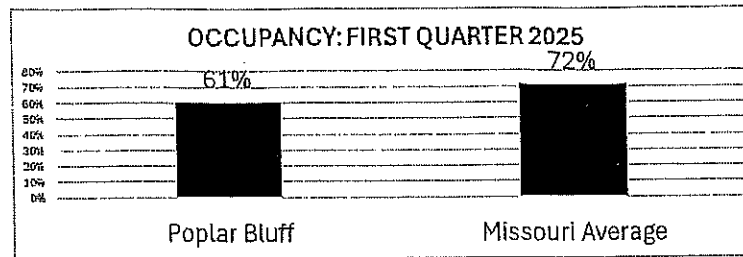
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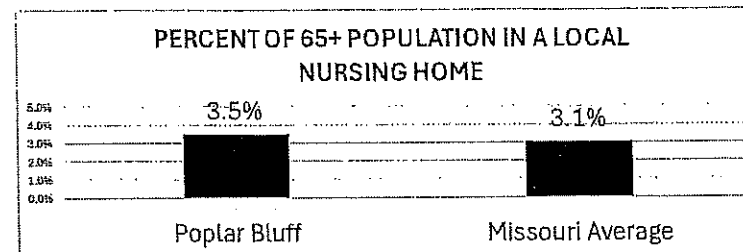
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There is no need for another NH all the beds are not full @ this time.

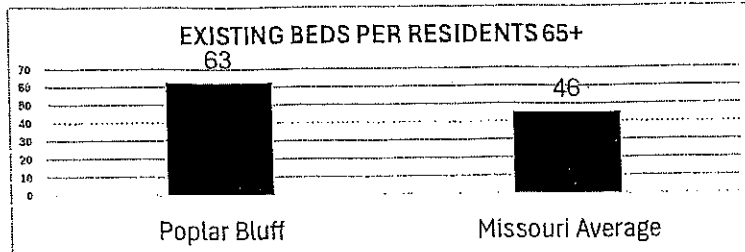
Name and Relationship to Westwood Hills:

Brenda Bartley

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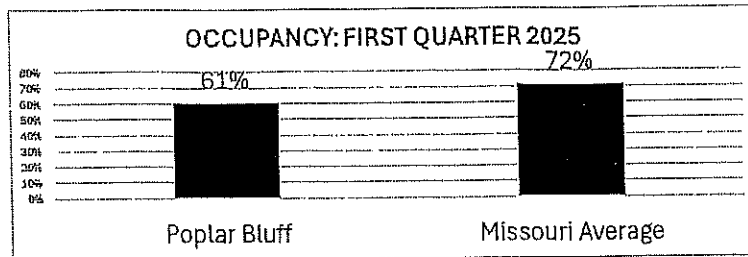
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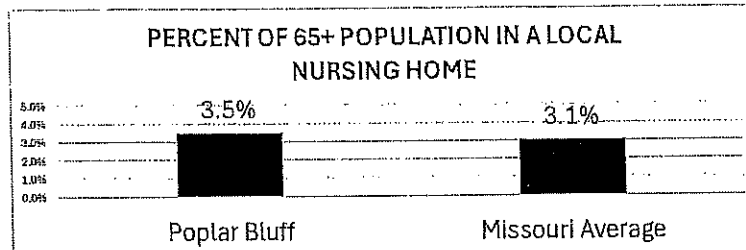
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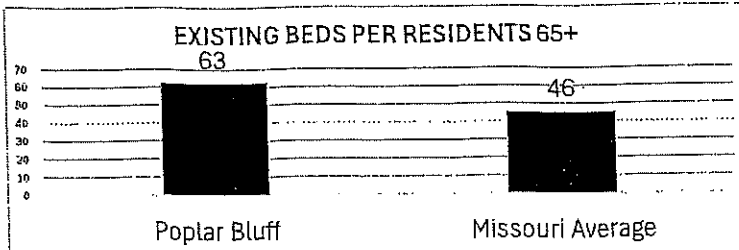
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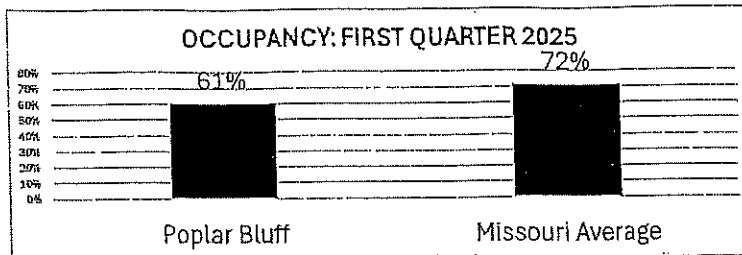
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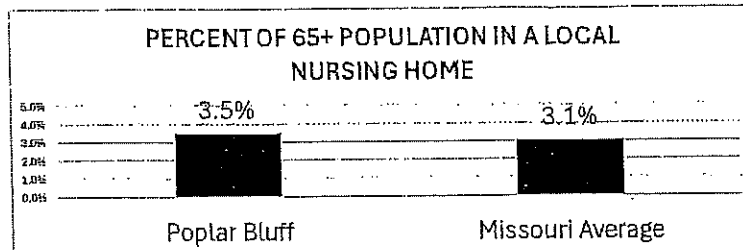
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Labs & other outsourced companies are already having a hard time managing the facilities that already run, and have to draw our own labs @'s due to the lab not having adequate staff. The people are already not getting adequate access to testing & hospital visits, which in return fills the hospital unnecessarily as testing is the only reason for their visit.

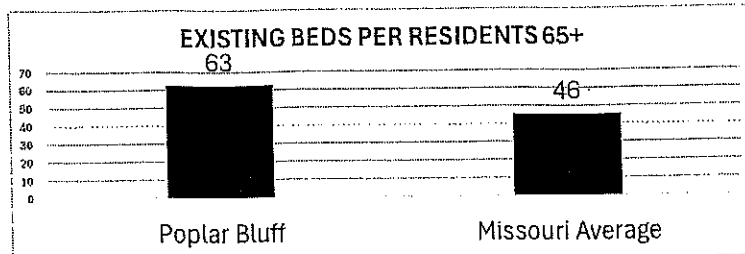
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UPN Employee

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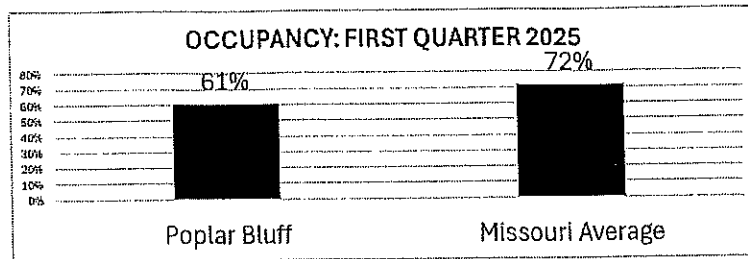
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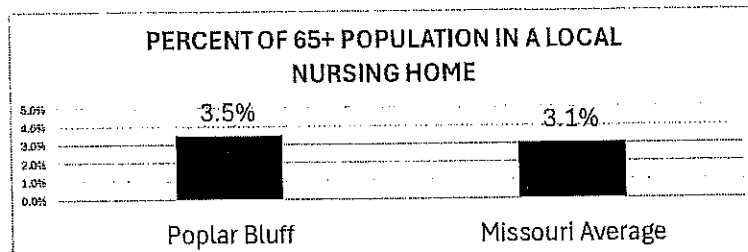
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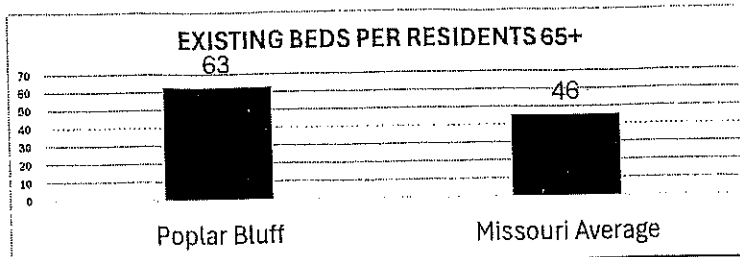
Jack Sherris

7/2/25

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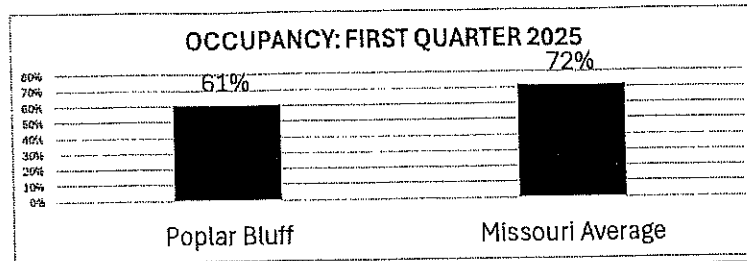
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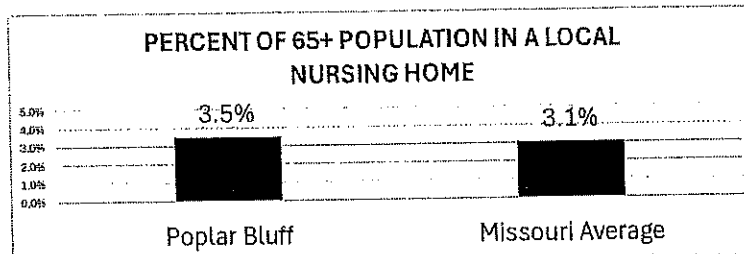
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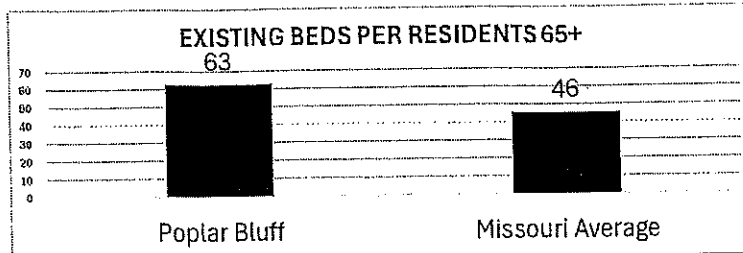
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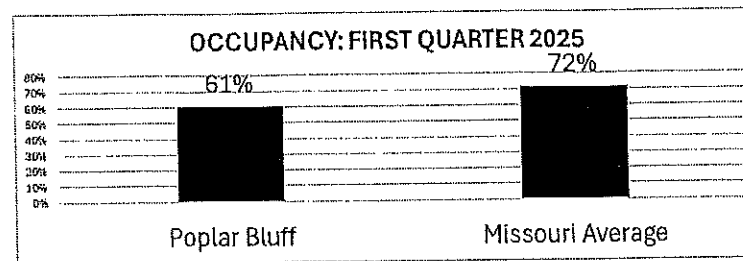
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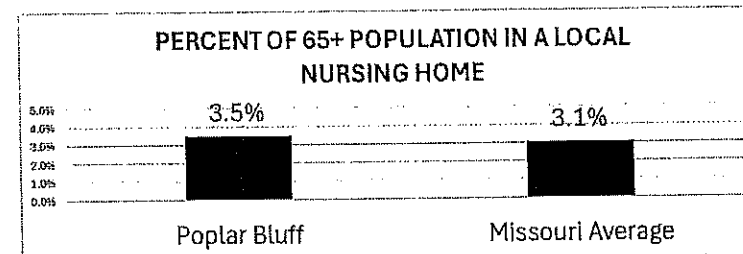
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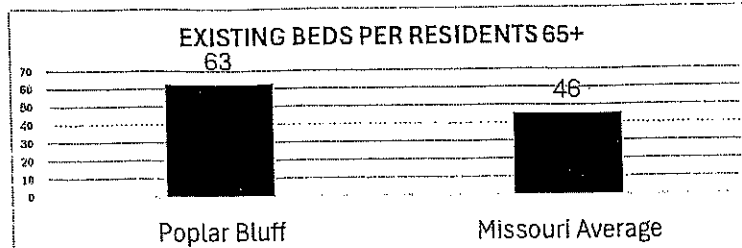
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VERON CUEVAS, DM/L
OCCUPATIONAL THERAPIST

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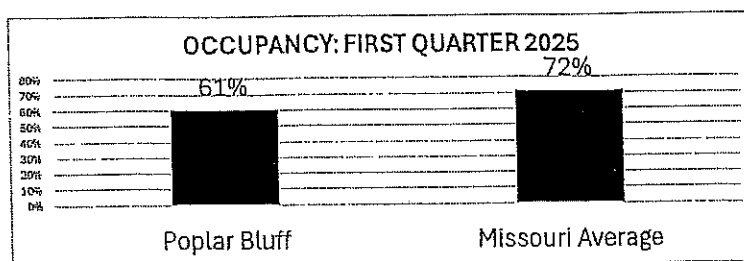
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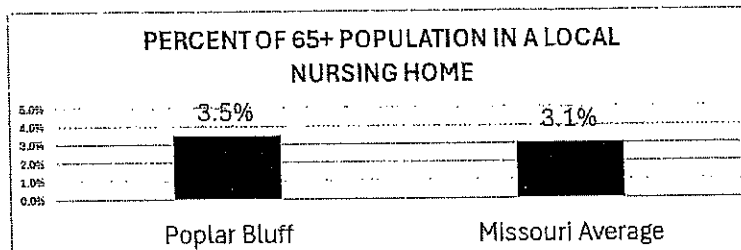
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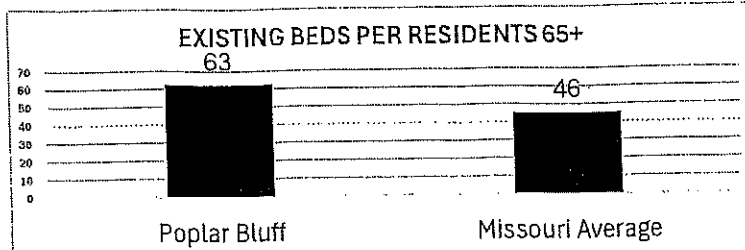
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Tracy Moffitt RN employee

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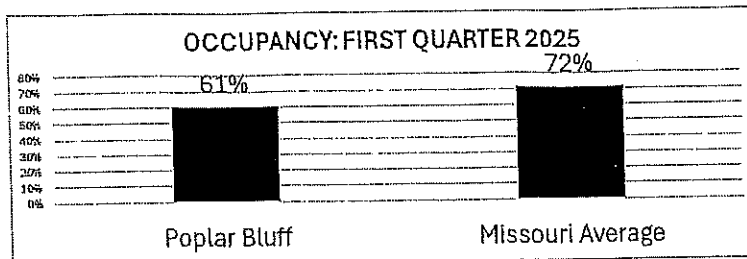
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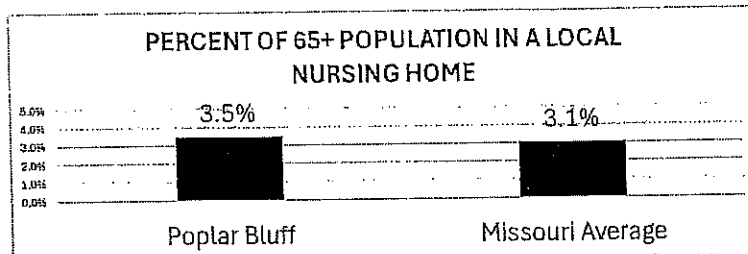
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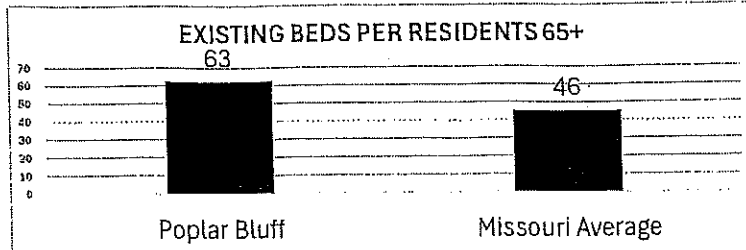
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Amber C. [Signature]

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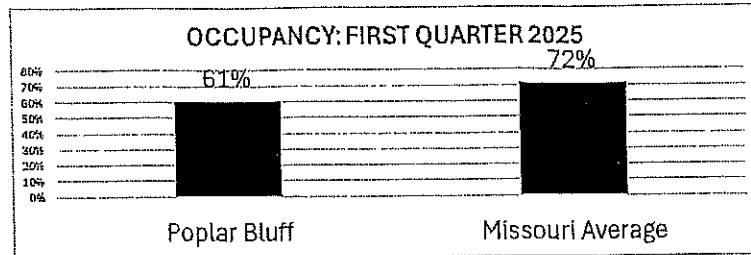
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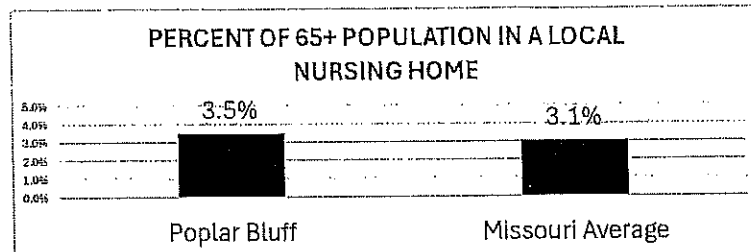
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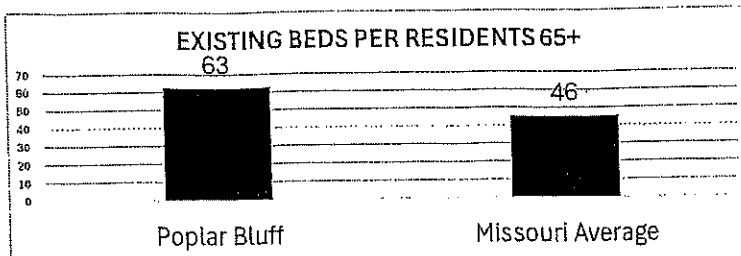
Name and Relationship to Westwood Hills:

Casly Curtis Johnson

POPLAR BLUFF NURSING HOME FACT SHEET

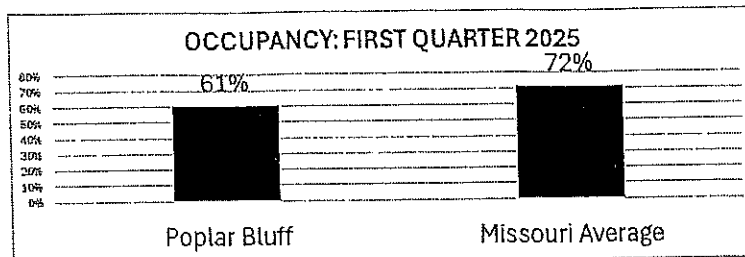
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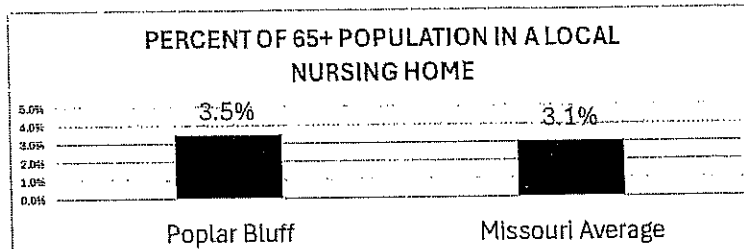
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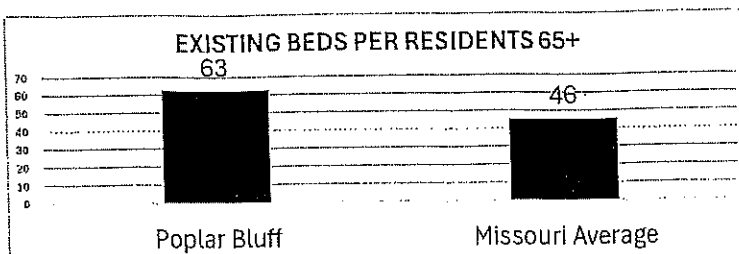
Name and Relationship to Westwood Hills:

Shirley McSwain

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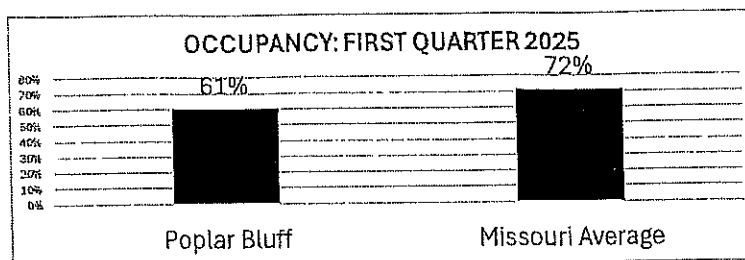
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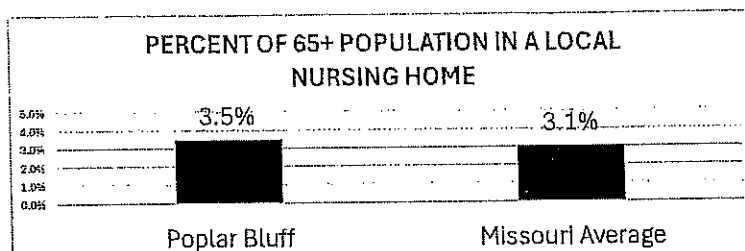
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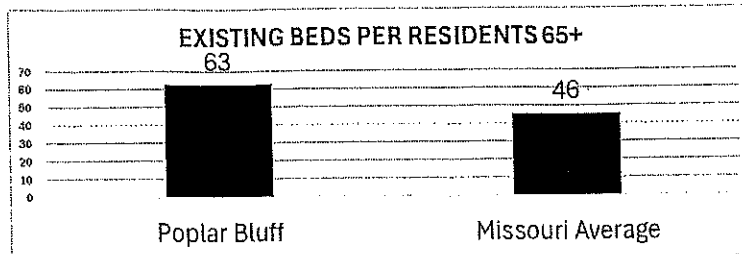
Name and Relationship to Westwood Hills:

Julia Griffin

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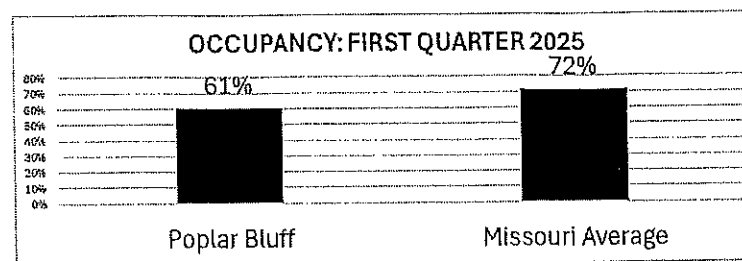
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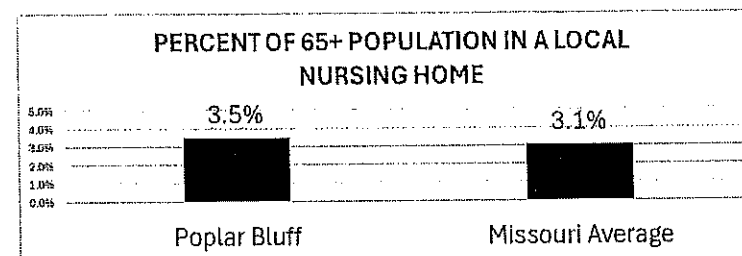
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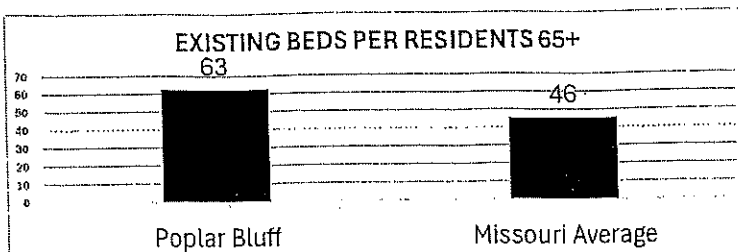
Name and Relationship to Westwood Hills:

Annmarie Arnold

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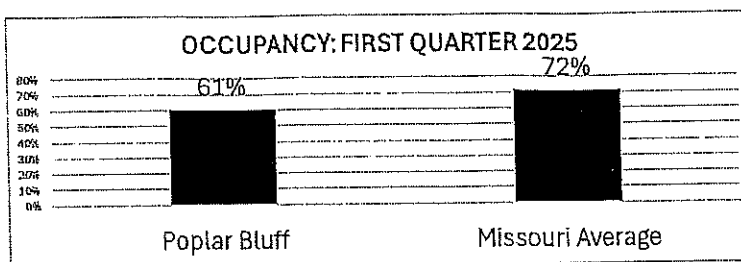
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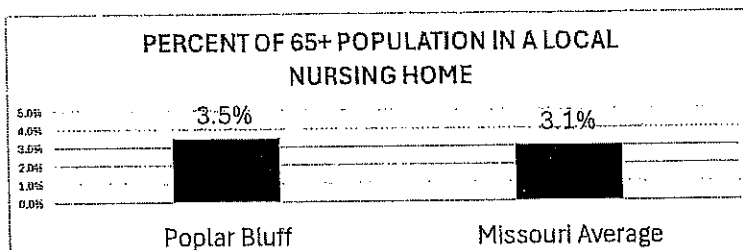
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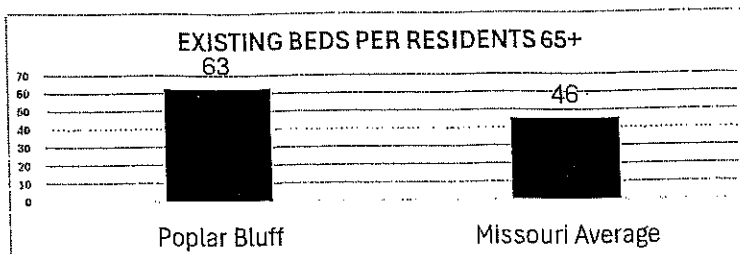
Name and Relationship to Westwood Hills:

Gavin Johnson

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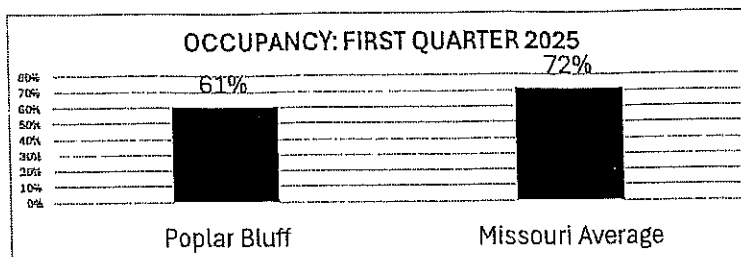
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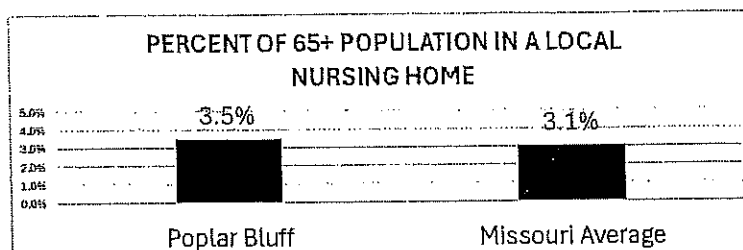
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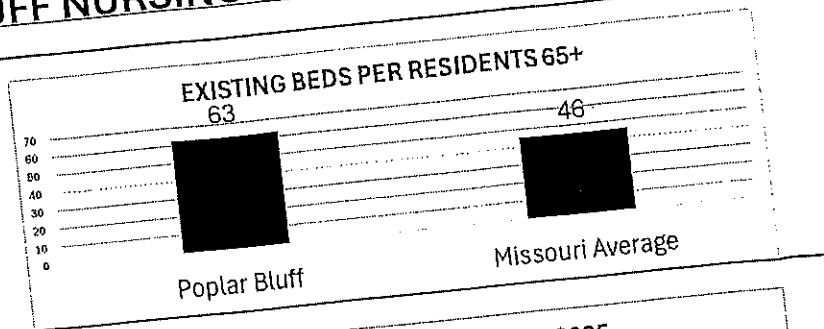
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Name and Relationship to Westwood Hills: Stephen J. RSM

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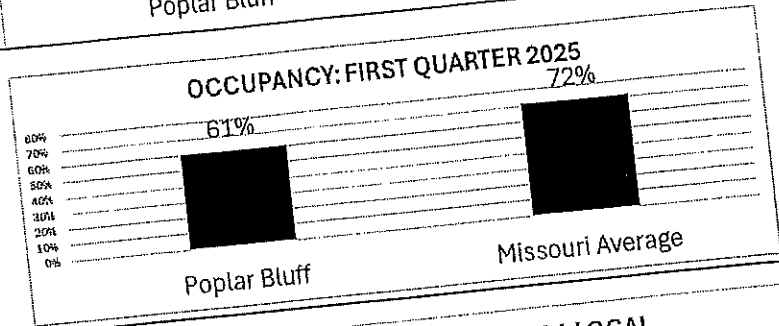
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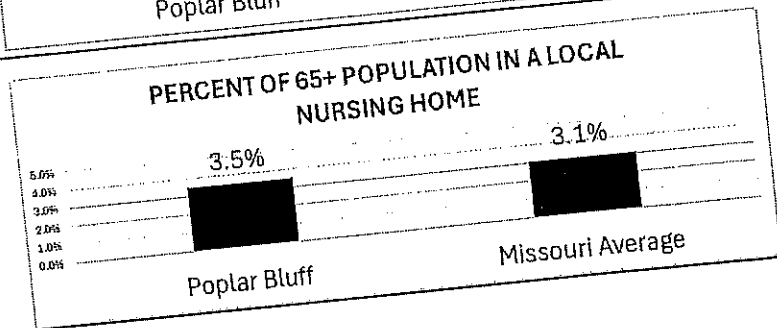
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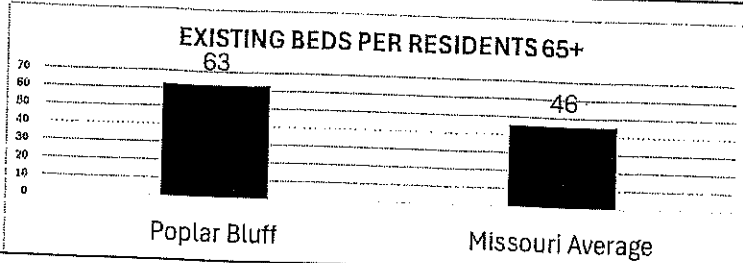
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Name and Relationship to Westwood Hills: *Debra B. Moore*

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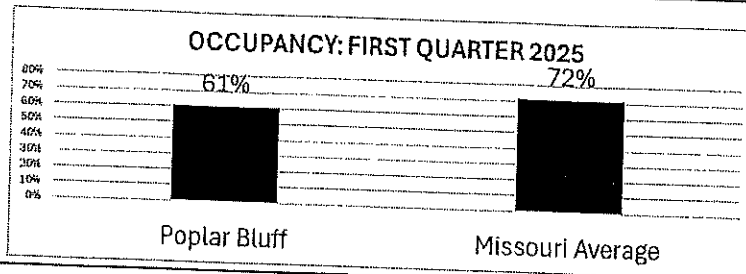
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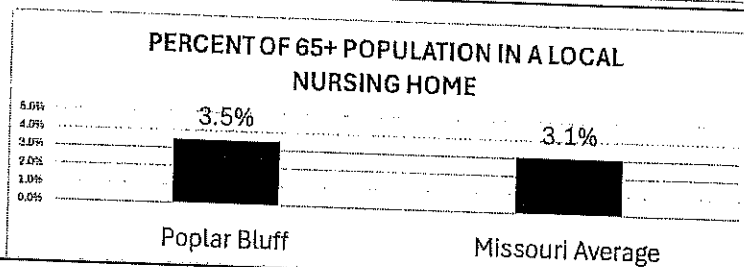
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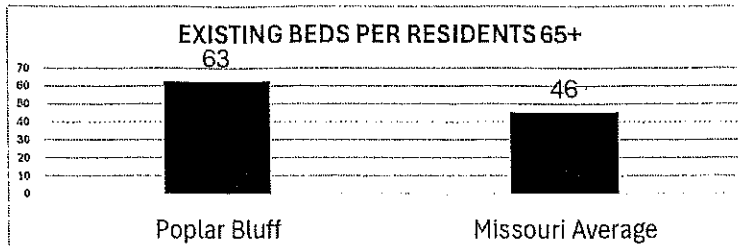
Name and Relationship to Westwood Hills:

Matthew Brown

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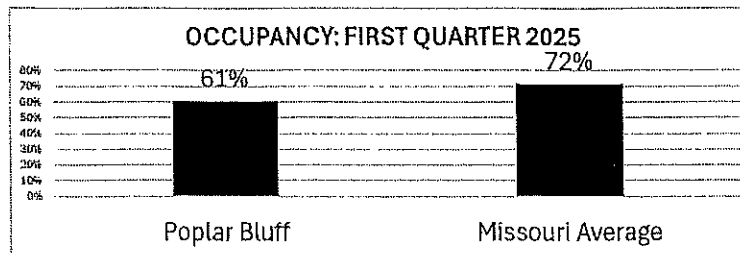
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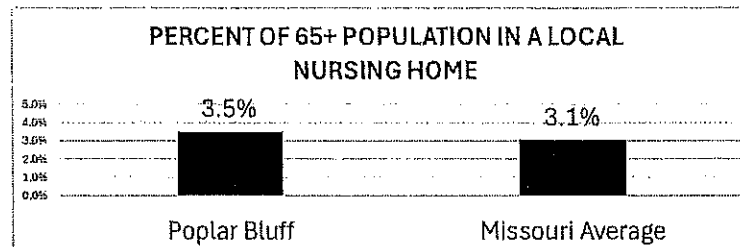
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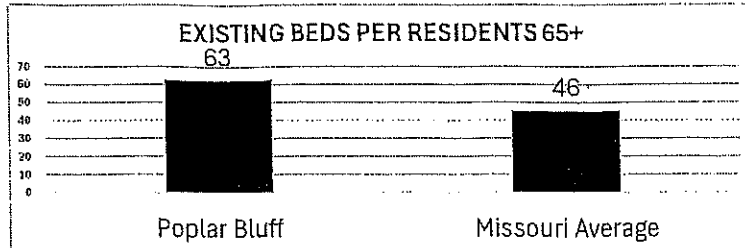
Name and Relationship to Westwood Hills:

Katie Wilmore

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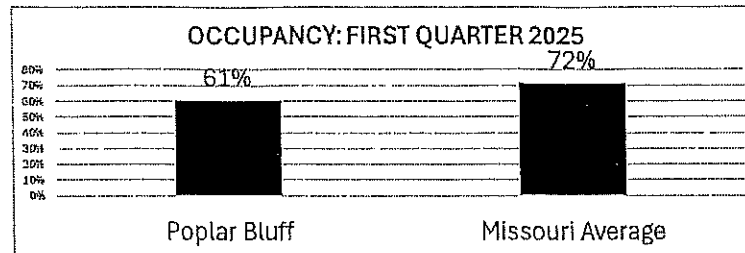
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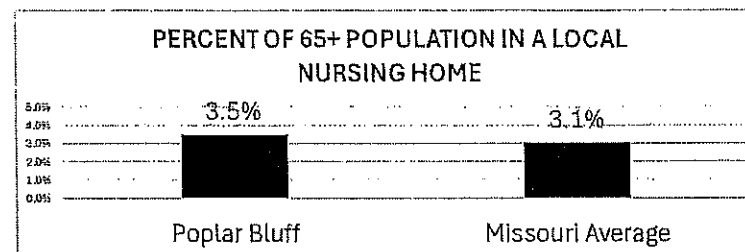
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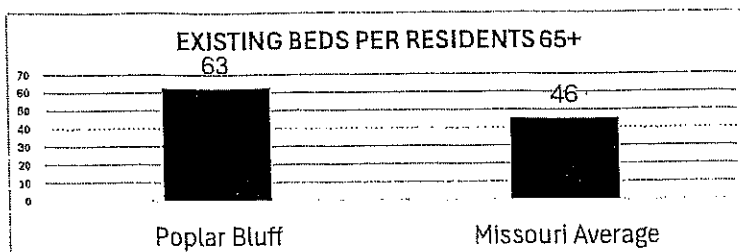
Name and Relationship to Westwood Hills:

Molly Adams

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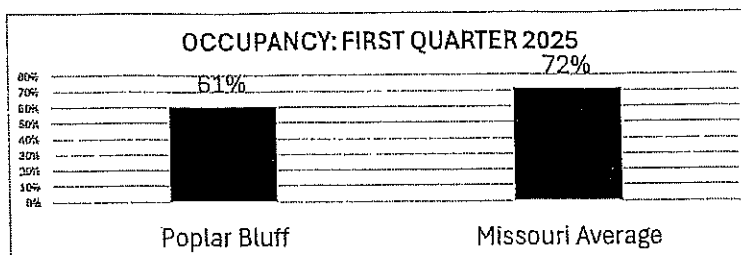
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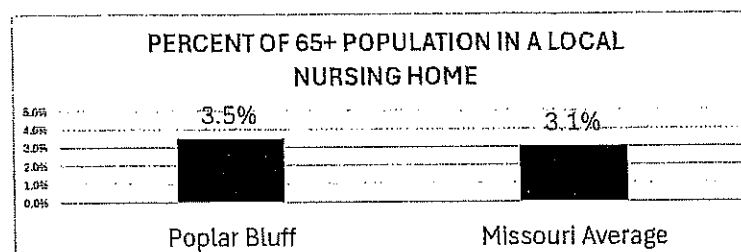
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Poplar Bluff doesn't need anymore nursing homes

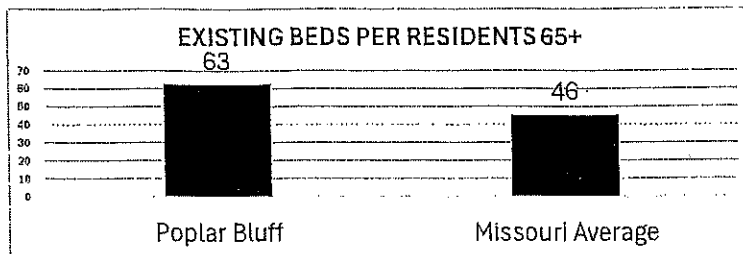
[Signature]

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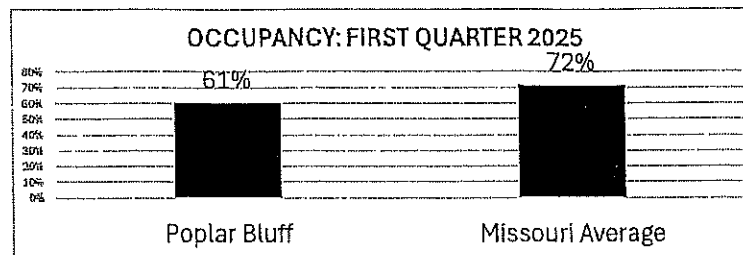
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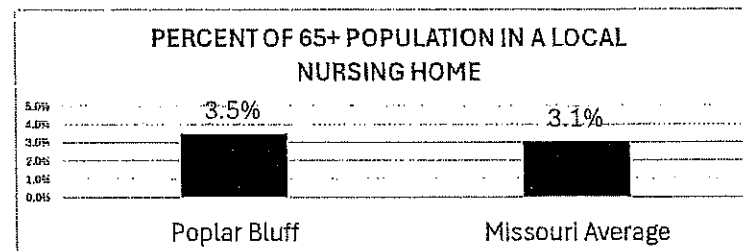
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Name and Relationship to Westwood Hills: Bruce Bolter



Missouri Health Facilities Review Committee
Certificate of Need Program
P.O. Box 570
Jefferson City, MO 65102

RE: Opposition to Certificate of Need Application – Proposed Facility in Poplar Bluff, MO

Dear Members of the Missouri Certificate of Need Board,

As President of Aspire Senior Living, I am writing to express our formal opposition to the recent Certificate of Need (CON) application proposing the construction of an additional skilled nursing facility in Poplar Bluff, Missouri.

Poplar Bluff is currently classified as an over-bedded area. Our internal analysis, supported by conversations with local hospital case managers, confirms there is no shortage of available skilled nursing beds in the region. Referral flows remain stable, and case managers report no significant delays or difficulties in placing patients in existing facilities. There is simply no demonstrated need for additional beds in this market.

More critically, the introduction of a new facility in an already saturated region poses a serious threat to the stability of the healthcare workforce. Like many communities, we are navigating a challenging labor environment. Our ability to consistently staff our facility with qualified caregivers is already strained. Adding another provider to the market will only deepen this strain—dividing a limited workforce and potentially compromising the quality of care for all residents in the area.

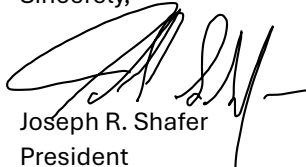
At Aspire Senior Living of Poplar Bluff, we remain deeply committed to our residents and to the long-term sustainability of senior care in this community. We are actively investing in the future of our facility through substantial capital improvements. These include a new roof, comprehensive refurbishment of our resident rooms and care wings, and a new state-of-the-art therapy wing and gym designed to enhance rehabilitation outcomes. These efforts demonstrate our commitment to continuous improvement and to meeting the evolving needs of our residents without the disruption of relocation or change in care providers.

One of our greatest concerns with the approval of this CON application is the unnecessary disruption it may cause to our residents. The introduction of a new facility could pressure some to relocate—uprooting long-standing relationships, trusted caregivers, and the sense of home that is so vital to quality of life in long-term care. These are not just beds or numbers; these are people who have built their lives within our community.

We urge the CON Board to closely examine the true need—both current and projected—for additional beds in Poplar Bluff. The evidence does not support expansion at this time, and the unintended consequences of oversaturation could have lasting negative impacts on resident care and workforce stability.

Thank you for your attention and thoughtful consideration.

Sincerely,



Joseph R. Shafer
President
Aspire Senior Living

Dear Missouri Certificate of Need Board,

I am writing to express my strong opposition to the Certificate of Need (CON) application submitted by Black River Skilled Nursing on May 2, 2025. As someone directly impacted by this proposal, I believe it does not align with the intent or standards of Missouri's CON program.

The purpose of the CON process is to determine actual need for additional healthcare services based on data, not speculation. The application's justification does not meet this threshold. Current data from the Poplar Bluff area reveals a consistent surplus of skilled nursing beds. These facilities often admit residents from outside the county to fill beds, not because of local population growth, but due to a declining and aging local population.

Since 1990, the Poplar Bluff area has grown by fewer than 1,000 residents. This modest increase over a 35-year period contradicts the projected population growth presented in the application. Furthermore, the proposed economic justification citing future interstate development is premature. While the I-57 expansion is underway, local officials have confirmed that full completion, from Little Rock to Charleston, Missouri, is still likely several years away. I have been told by local officials that it will be a 30-year project, for full interstate completion. It is misleading to base current need and investment decisions on infrastructure that may not be realized for decades.

Additionally, during a public presentation at Three Rivers College, Mr. Ben Sells acknowledged that staffing for the proposed facility would rely on recruiting licensed professionals from India and Philippines via work visa programs through Canada. This approach raises serious concerns about the long-term benefit to Butler County residents and the ability to sustain a local workforce.

I am a lifelong resident of Butler County, member of the Twin Rivers Board of Education, and Twin Rivers R-X, SPED Booster. I love our community and would love to see it grown but I would like to see responsible growth in our community. Responsible growth must be grounded in data. At this time, the available information does not support the need for additional certified skilled nursing beds in the Poplar Bluff area. Expanding capacity without demonstrated demand risks destabilizing existing facilities that are already operating below optimal occupancy levels.

I urge the Board to uphold the integrity of the CON standards and reject this application. The evidence does not support a true need, and the long-term implications for local providers and residents should not be overlooked. Please vote in opposition, or elect not to advance this proposal.

Sincerely,

Bobby King, LNHA
Administrator, Riverways Manor

6/4/2025

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 an employee of a long term care facility in Southeast Missouri. My residents, and their friends and family will be directly affected by this approval.

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,



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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.

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Respectfully,

Jose Rodriguez

6/4/2025

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

Missouri Certificate of Need Board,

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Respectfully,



6/4/2025

Missouri Certificate of Need Program
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P.O. Box 570
Jefferson City, MO 65102

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Respectfully,

Wash LPR

6/4/2025

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

Missouri Certificate of Need Board,

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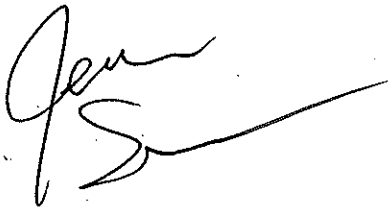
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Respectfully,

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6/4/2025

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

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Respectfully,

A handwritten signature in black ink, appearing to read "Samara Lanthier". The signature is fluid and cursive, with a large loop at the end.

6/4/2025

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Respectfully,

MELISSA BANKS

6/4/2025

Missouri Certificate of Need Program
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P.O. Box 570
Jefferson City, MO 65102

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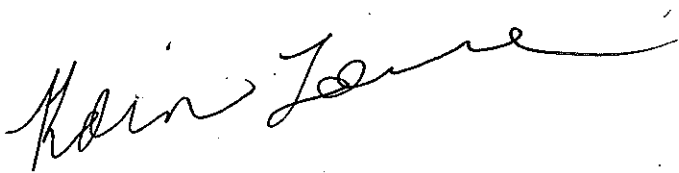
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Respectfully,

A handwritten signature in dark ink, appearing to read "Karin Jones", written in a cursive style.

6/4/2025

Missouri Certificate of Need Program
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Jefferson City, MO 65102

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Respectfully,

A handwritten signature in black ink, appearing to be "L. Walker" or similar, written in a cursive style.

6/4/2025

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Jefferson City, MO 65102

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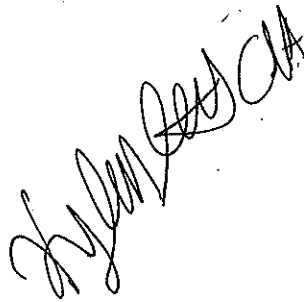
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Respectfully,

A handwritten signature in dark ink, appearing to read "Alison Dorge", is written diagonally across the lower right portion of the page.

6/4/2025

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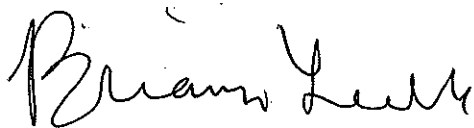
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Respectfully,

A handwritten signature in black ink, appearing to read "Brian Lutz". The signature is written in a cursive, flowing style with a large initial "B".

6/4/2025

Missouri Certificate of Need Program
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P.O. Box 570
Jefferson City, MO 65102

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Respectfully,

Heather L Wright
BOM

6/4/2025

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Respectfully,

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6/4/2025

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P.O. Box 570
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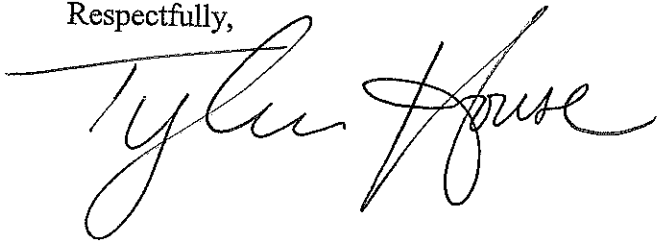
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A handwritten signature in black ink, appearing to read "Tyler House". The signature is fluid and cursive, with a long horizontal line extending from the "T" across the top of the name.

6/4/2025

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

Missouri Certificate of Need Board,

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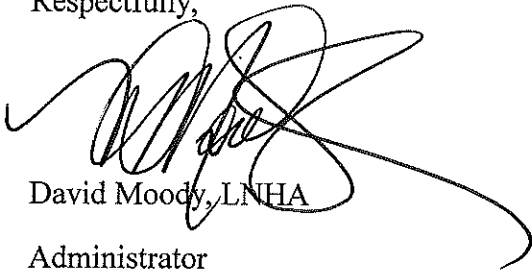
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Respectfully,

A handwritten signature in black ink, appearing to read 'David Moody', is written over a large, stylized, and somewhat illegible signature that spans across the signature line and into the margin.

David Moody, LNHA

Administrator

Brent B. Tinnin Manor

220 Euel Polk Dr.

Ellington, MO 63638

6/4/2025

Missouri Certificate of Need Program
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P.O. Box 570
Jefferson City, MO 65102

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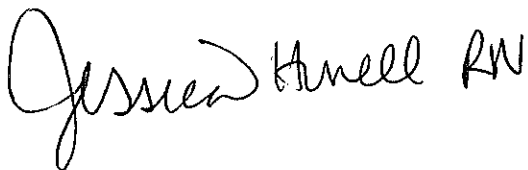
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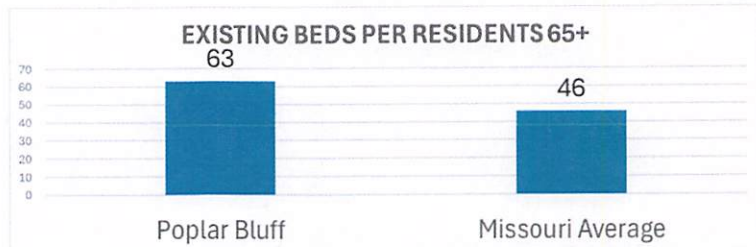
Respectfully,

 Jessica Hnell RN

POPLAR BLUFF NURSING HOME FACT SHEET

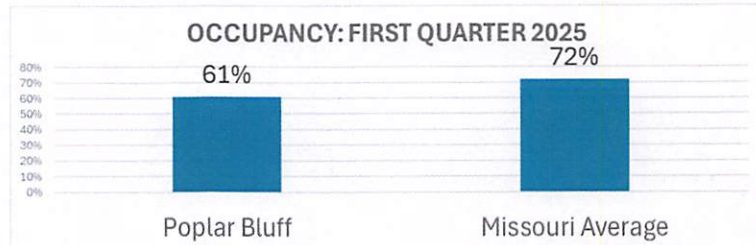
DOES POPLAR BLUFF CURRENTLY HAVE ENOUGH NURSING HOME BEDS?

YES! Poplar Bluff has way more nursing home beds than is normal!



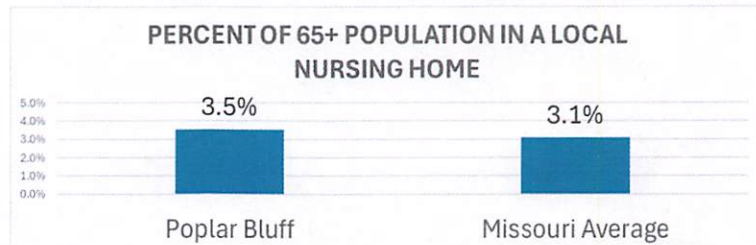
ARE THE EXISTING BEDS MOSTLY FILLED?

NO! The existing homes have more than 200 unfilled beds, putting occupancy at just over 60%, compared to the state average of 72%.



ARE THE BEDS EMPTY BECAUSE PEOPLE THINK THE EXISTING HOMES ARE UNDESIRABLE?

NO! Citizens 65+ in Poplar Bluff are **more likely** to choose a local nursing home, not less.



DO THE EXISTING NURSING HOMES PROVIDE GOOD QUALITY?

YES! The existing homes have 132 beds rated the maximum 5 stars by CMS for Quality Measures, and more than 200 beds rated 3 or more stars. Over 60 of them are unoccupied.

CMS QUALITY RATINGS	Total	Available Today!
Rated 5 stars	132	62
Rated 3+ stars	202	67

Please feel free to write your own comments and turn this in to Monica Hill, Administrator of Oakdale, who will collect all the letters and submit them for the upcoming hearing.

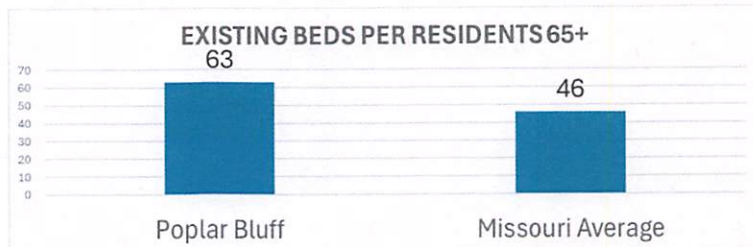
I am opposed to this. If it were about caring for the elderly they wouldn't want to build a new home, but rather buy an existing one.

Name and Relationship to Oakdale: *Michelle Hartley - family*

POPLAR BLUFF NURSING HOME FACT SHEET

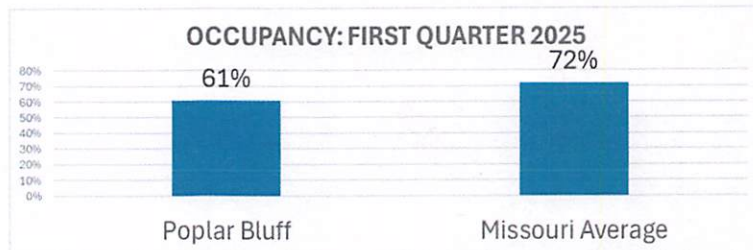
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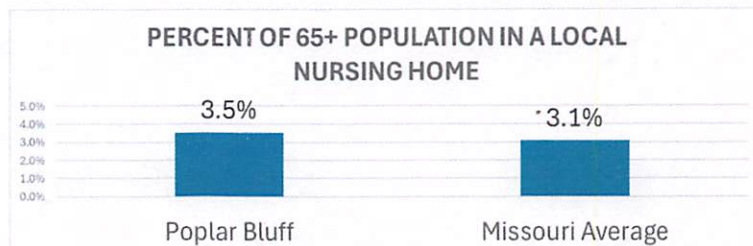
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Adding a new building is not a smart move. I am more than apposed to this. Doing this is not caring about the elderly, it is about money and recognition.

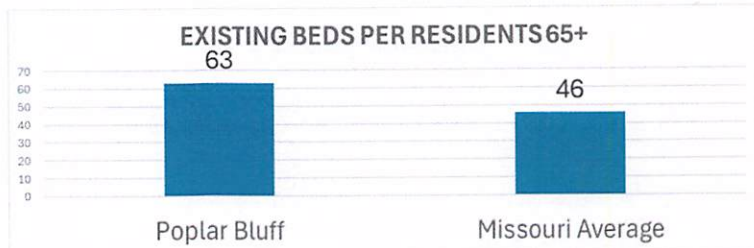
Name and Relationship to Oakdale:

Janet Roberts - neighbor

POPLAR BLUFF NURSING HOME FACT SHEET

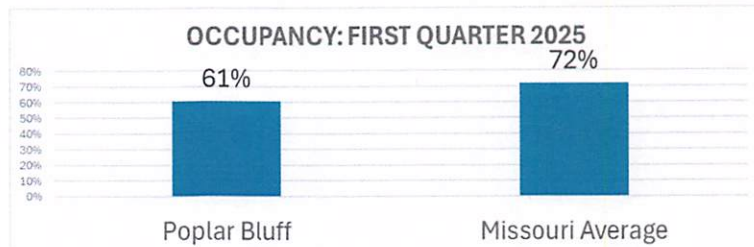
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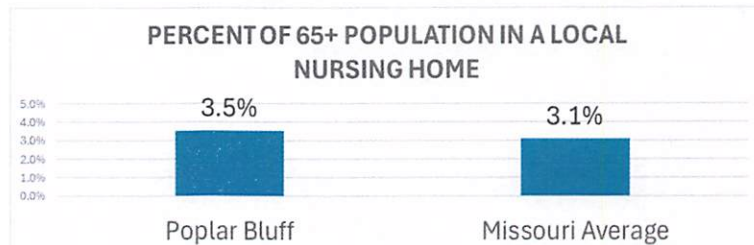
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I do not agree with this because this area already has more than enough homes. It's not about the lack there of but the quality. Funds should be for improving homes already here - that have beds available and to be able to staff them properly.

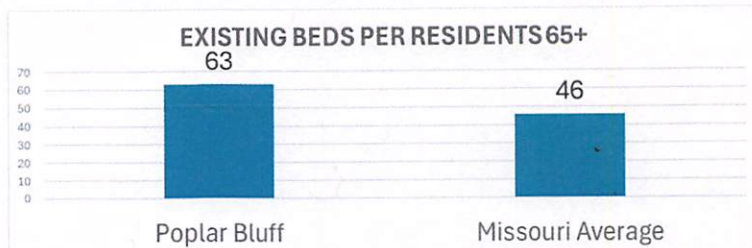
Name and Relationship to Oakdale:

Kristian LeGrand, employee

POPLAR BLUFF NURSING HOME FACT SHEET

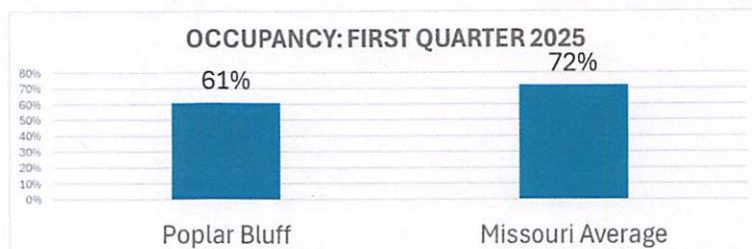
DOES POPLAR BLUFF CURRENTLY HAVE ENOUGH NURSING HOME BEDS?

YES! Poplar Bluff has way more nursing home beds than is normal!



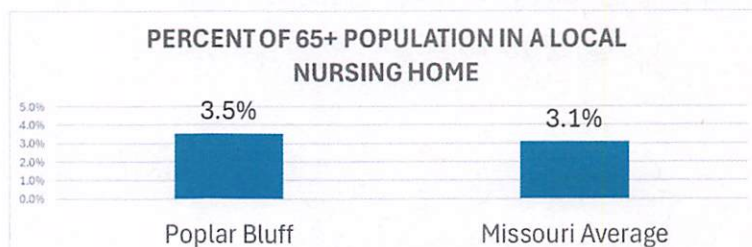
ARE THE EXISTING BEDS MOSTLY FILLED?

NO! The existing homes have more than 200 unfilled beds, putting occupancy at just over 60%, compared to the state average of 72%.



ARE THE BEDS EMPTY BECAUSE PEOPLE THINK THE EXISTING HOMES ARE UNDESIRABLE?

NO! Citizens 65+ in Poplar Bluff are **more likely** to choose a local nursing home, not less.



DO THE EXISTING NURSING HOMES PROVIDE GOOD QUALITY?

YES! The existing homes have 132 beds rated the maximum 5 stars by CMS for Quality Measures, and more than 200 beds rated 3 or more stars. Over 60 of them are unoccupied.

CMS QUALITY RATINGS	Total	Available Today!
Rated 5 stars	132	62
Rated 3+ stars	202	67

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I am against this opening due to the fact of having a loved one currently in a Poplar Bluff home & seeing first hand how staffing can change so quickly this would create absolute chaos through this turn. Our residents & fellow families deserve to be @ ease. This has created unwarranted stress. Why not put the time & effort into helping the ones already here.

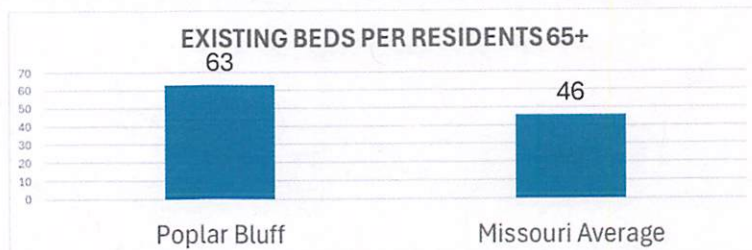
Name and Relationship to Oakdale:

Calmen Priest - Family

POPLAR BLUFF NURSING HOME FACT SHEET

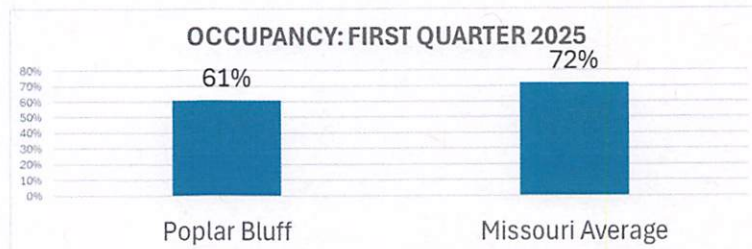
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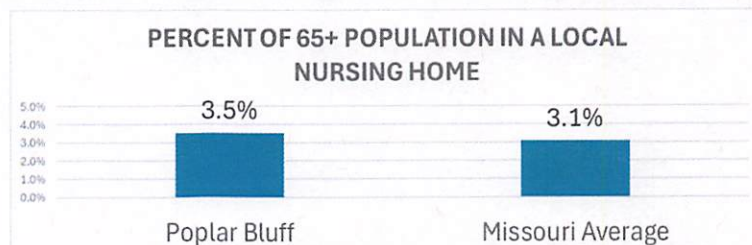
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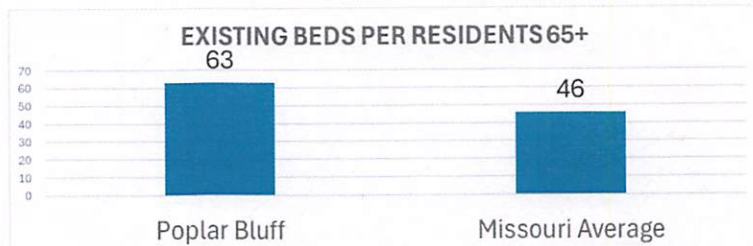
This will most definitely hinder the care that residents receive due to staffing issues that this will cause. It would better serve our community for them to buy an existing building. This should not be allowed to happen.

Name and Relationship to Oakdale: *Patricia O'Neil - family*

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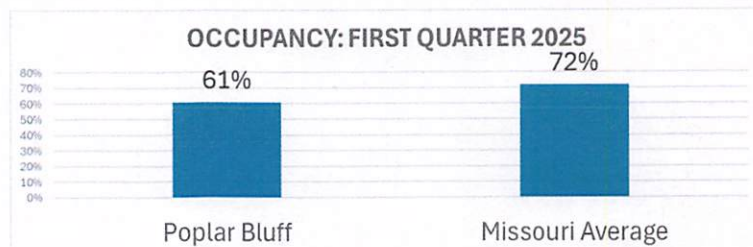
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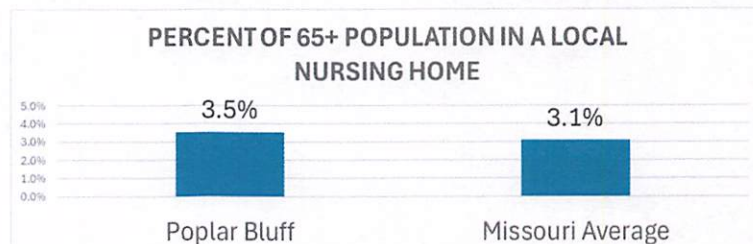
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My family got GREAT care at the facility he is at. I feel as if a new facility will hinder that. by causing a shortage with staffing.

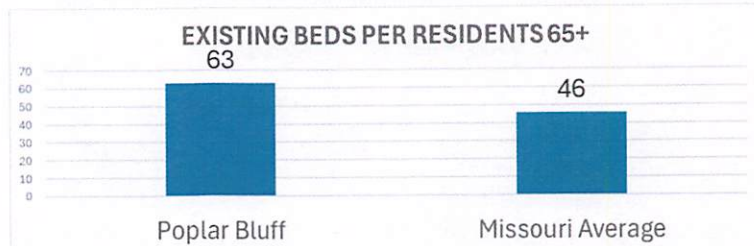
Name and Relationship to Oakdale:

Jim Far - family member

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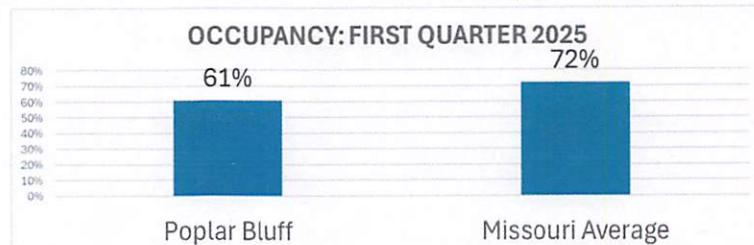
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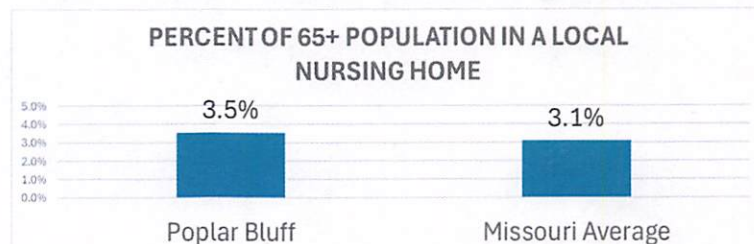
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Sure job availability will increase, but isn't it hard enough finding employees already? Let the other homes fill up before trying to add a new nursing home

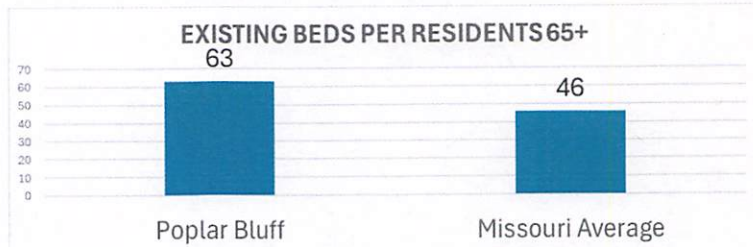
Name and Relationship to Oakdale:

John Rand - neighbor

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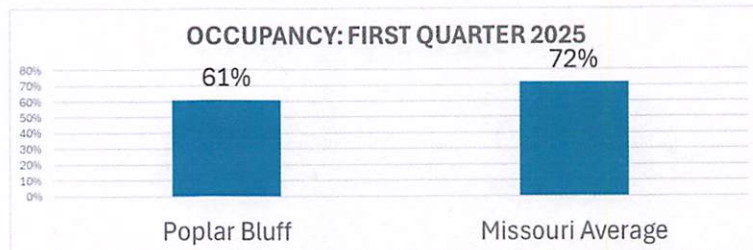
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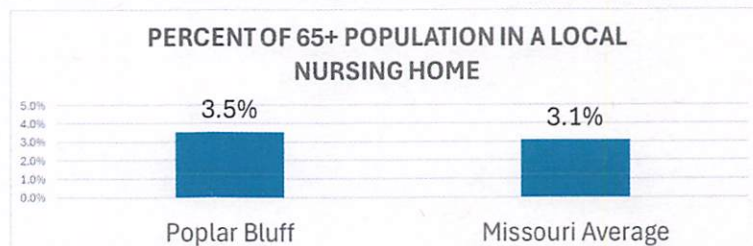
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A new building doesn't mean quality of care will be better! This will not be good for the community.

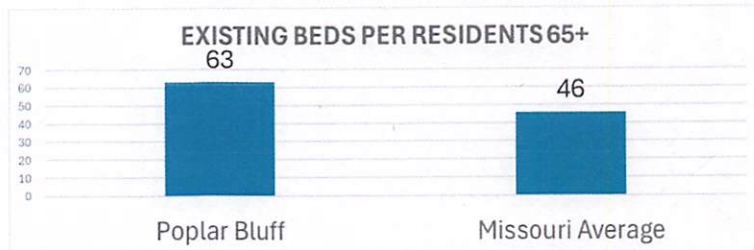
Name and Relationship to Oakdale:

Shirley Eason - resident

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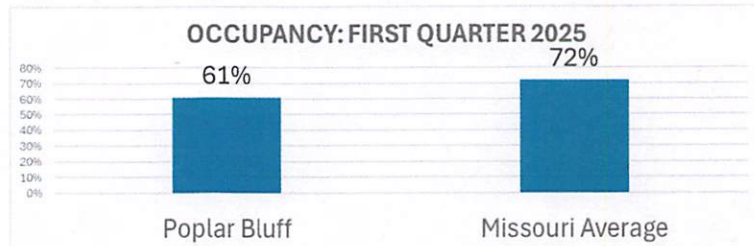
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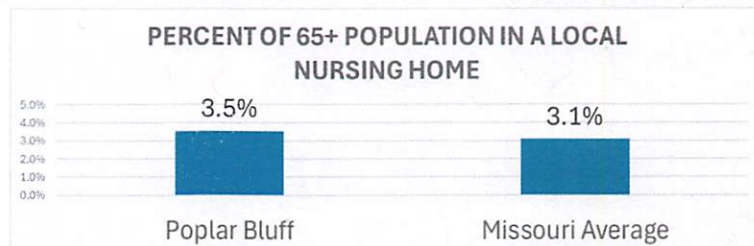
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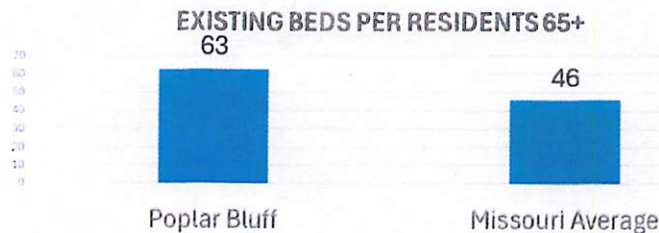
The nursing homes we have are sufficient! This will affect our current homes and residents in a bad way. Adding a new nursing home seems to be more about power and money than it does about the care of residents.

Name and Relationship to Oakdale: *Monica Hill* - employee

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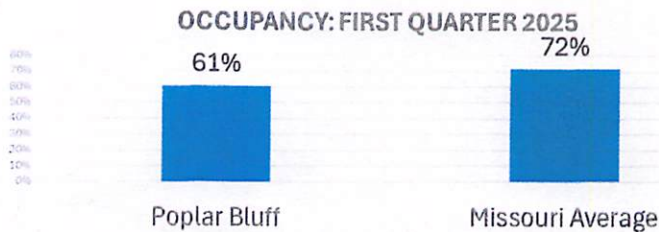
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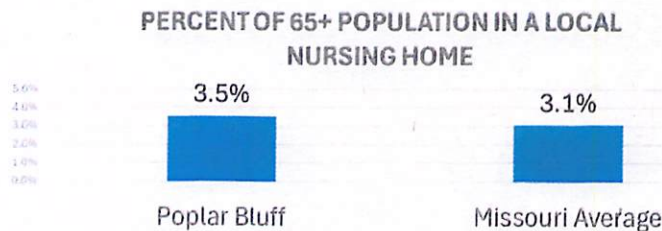
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would like to see the current nursing homes in Poplar Bluff be free prior to opening a new home.

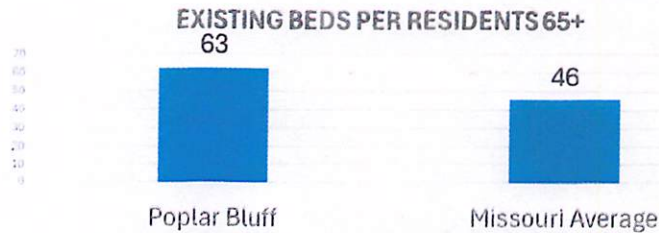
Name and Relationship to Oakdale:

Sharon Hill employer

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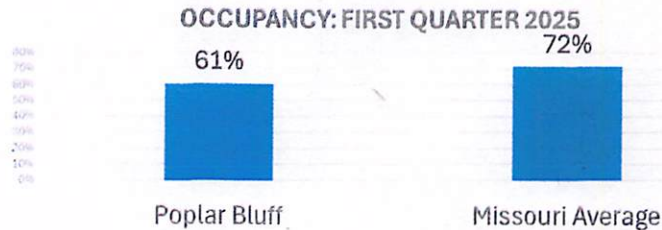
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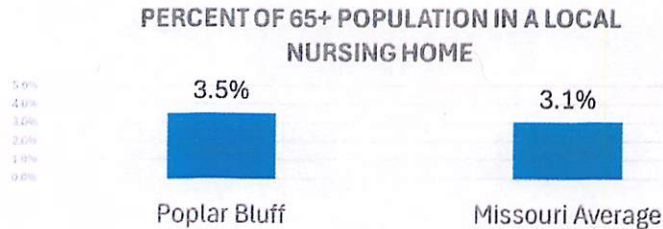
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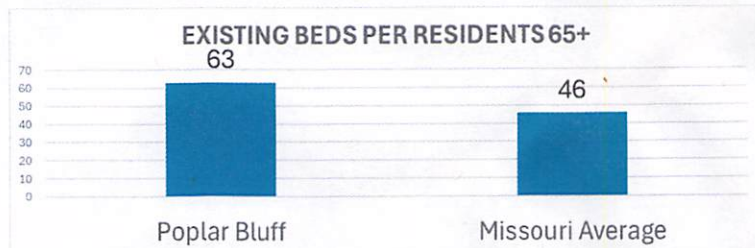
Name and Relationship to Oakdale:

Dora H. White

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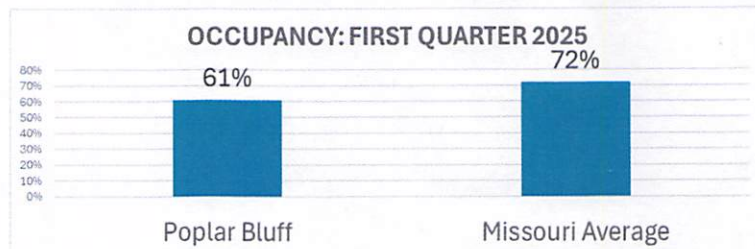
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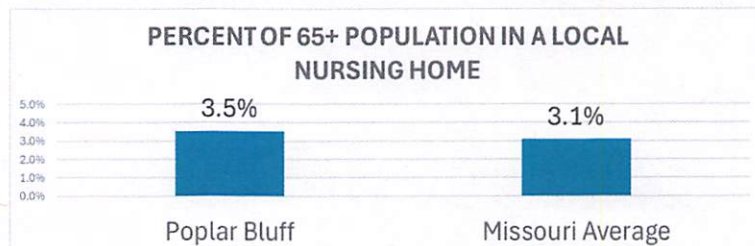
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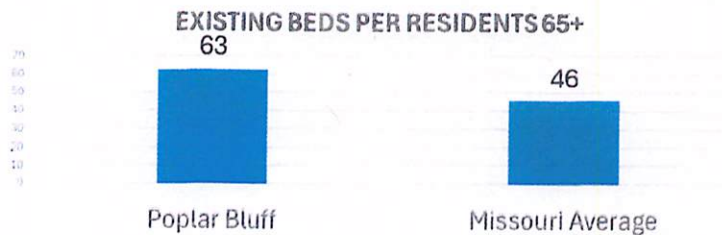
I feel that Poplar Bluff is blessed with several good SNF, and is able to fulfill the need for the elderly population. Our geriatric population is well served with quality nursing needed to meet their needs.

Name and Relationship to Oakdale: *Deeb Hess YRn MGS Coord.*

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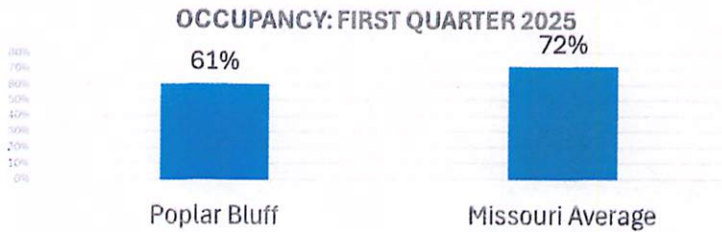
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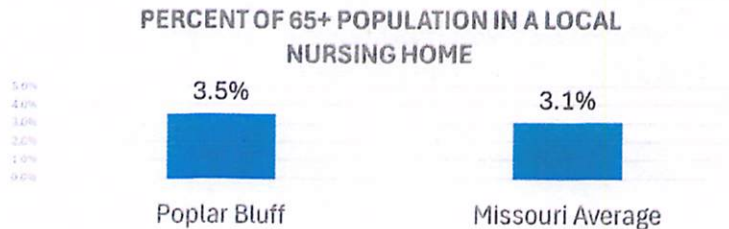
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We need to fill the homes we currently have. Short staffing is an issue, so when they come to Poplar Bluff, we may lose staff. Yes, this will provide jobs, but it may also affect facilities negatively with losing staff.

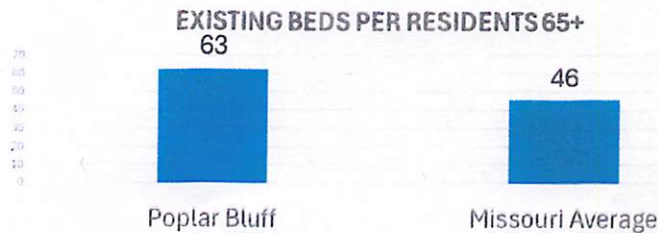
Name and Relationship to Oakdale:

Celia Robinson RN DON

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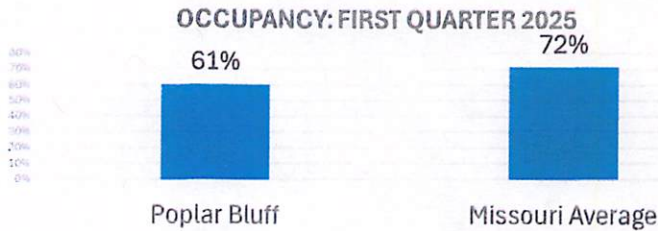
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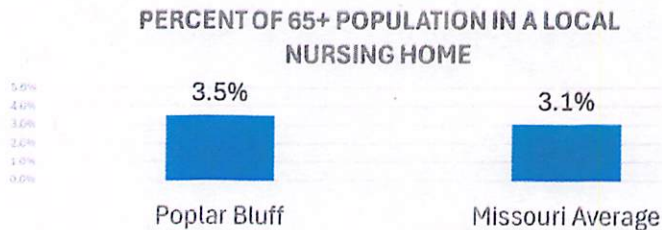
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Staffing is already difficult to find for the existing nursing homes. Adding a new Nursing facility will cause further CNA shortages.

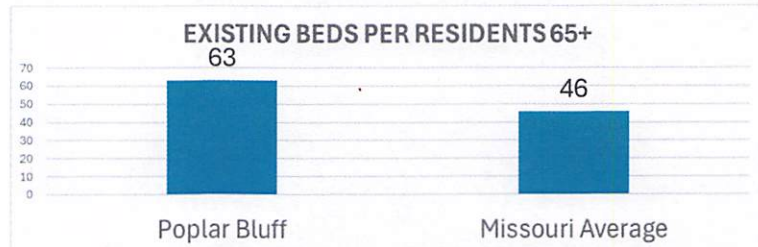
Name and Relationship to Oakdale:

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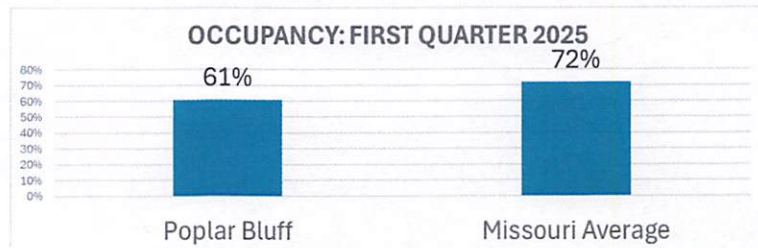
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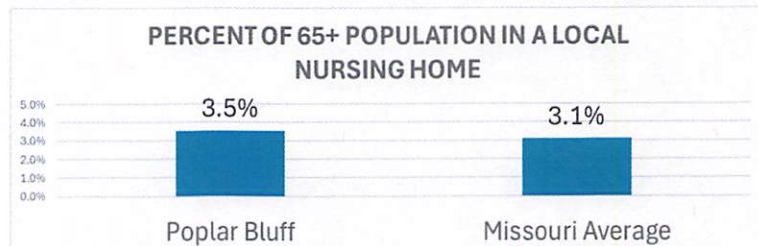
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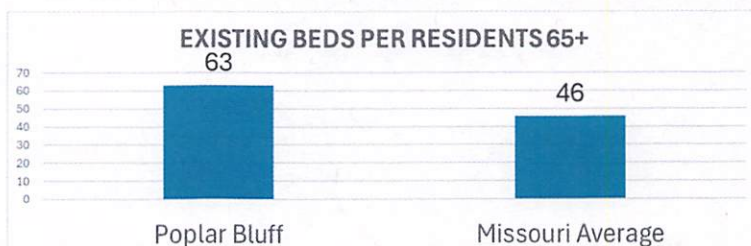
There is no need for a new nursing home in Poplar Bluff! The statistics prove that. Staffing is already difficult for the existing nursing homes. The existing homes are well under the threshold of 93% occupancy, so how can another home possibly be approved to build?

Name and Relationship to Oakdale: *Monica Hill - Administrator*

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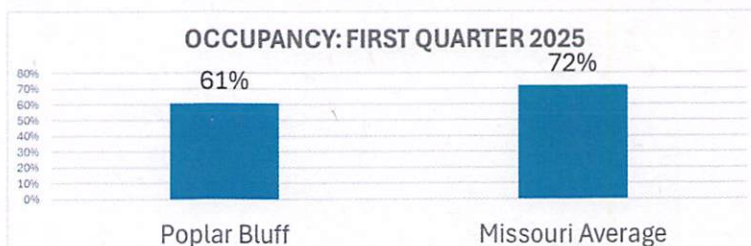
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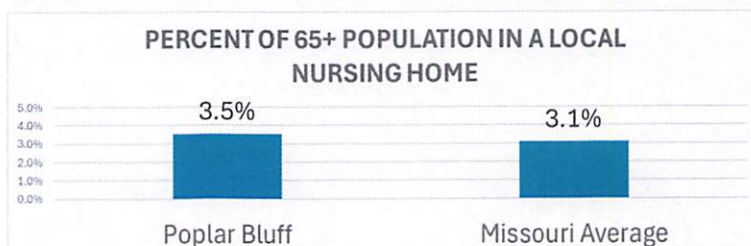
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With a community this size, we have several long term facilities in this area. There are not enough trained facility skilled nurses to staff the current facilities. A new facility that big will cause a nursing shortage in this area. Fewer nurses to staff already existing facilities will be diverting to the long term residents in those homes.

Name and Relationship to Oakdale: *Bryan Robinett LCN Director of Oakdale Assisted+RCF*

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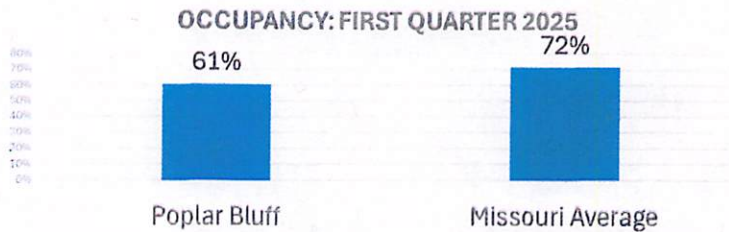
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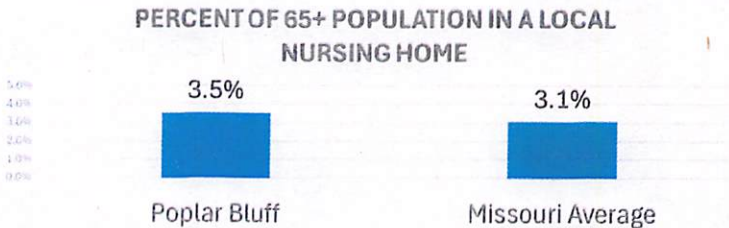
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YES! The existing homes have 132 beds rated the maximum 5 stars by CMS for Quality Measures, and more than 200 beds rated 3 or more stars. Over 60 of them are unoccupied.

CMS QUALITY RATINGS	Total	Available Today!
Rated 5 stars	132	62
Rated 3+ stars	202	67

Please feel free to write your own comments and turn this in to Monica Hill, Administrator of Oakdale, who will collect all the letters and submit them for the upcoming hearing.

I believe the new Building will take away from the care we receive now, by diluting the care we receive.

Name and Relationship to Oakdale:

Keith A. Scott

POPLAR BLUFF NURSING HOME FACT SHEET

DOES POPLAR BLUFF CURRENTLY HAVE ENOUGH NURSING HOME BEDS?

YES! Poplar Bluff has way more nursing home beds than is normal!

EXISTING BEDS PER RESIDENTS 65+

70
60
50
40
30
20
10
0



Poplar Bluff

46



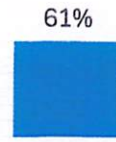
Missouri Average

ARE THE EXISTING BEDS MOSTLY FILLED?

NO! The existing homes have more than 200 unfilled beds, putting occupancy at just over 60%, compared to the state average of 72%.

OCCUPANCY: FIRST QUARTER 2025

80%
70%
60%
50%
40%
30%
20%
10%
0%



Poplar Bluff

72%



Missouri Average

ARE THE BEDS EMPTY BECAUSE PEOPLE THINK THE EXISTING HOMES ARE UNDESIRABLE?

NO! Citizens 65+ in Poplar Bluff are **more likely** to choose a local nursing home, not less.

PERCENT OF 65+ POPULATION IN A LOCAL NURSING HOME

5.0%
4.0%
3.0%
2.0%
1.0%
0.0%



Poplar Bluff

3.1%



Missouri Average

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Total

132

202

Available

Today!

62

67

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I'm my husband has been here for the last 2 years. Good workers, good cafeteria, very pleasant for once. Butted a new one, people leave and we start all over again.

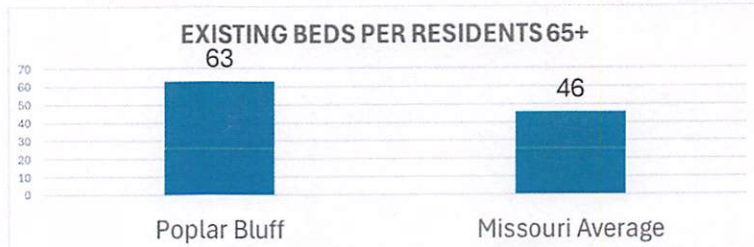
Name and Relationship to Oakdale:

Mary Mochman, Jim's wife
1020

POPLAR BLUFF NURSING HOME FACT SHEET

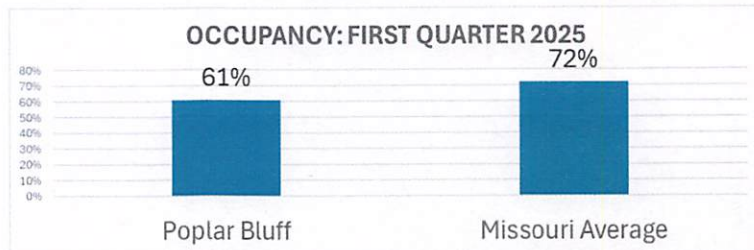
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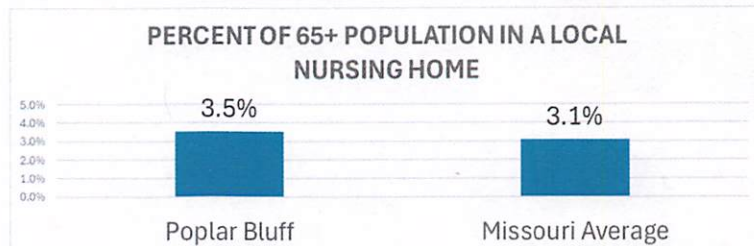
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I am strongly opposed to the addition of a new skilled nursing home in our community. Our small town currently has five existing nursing homes, all of which are operating below full capacity with open beds available. These facilities are facing ongoing staffing shortages, which directly affect the quality of care for current residents. Introducing another facility at this time risks spreading our limited workforce even thinner, potentially undermining the stability of existing homes rather than enhancing care options.

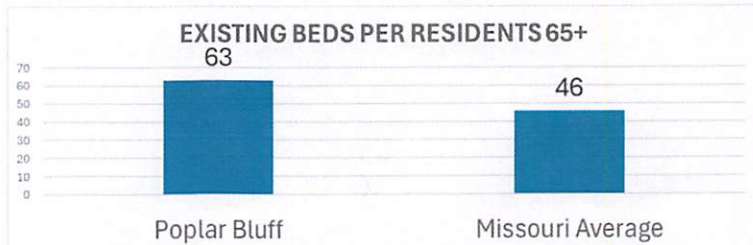
Name and Relationship to Oakdale:

Ruighann O'Neal, PTA / Director of Rehab

POPLAR BLUFF NURSING HOME FACT SHEET

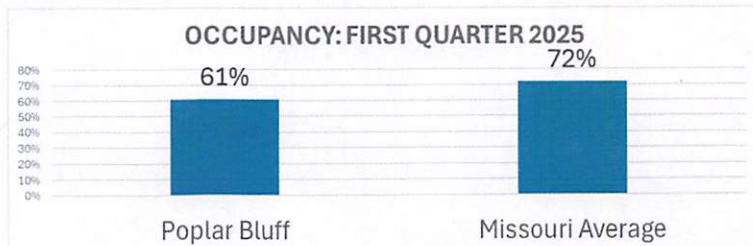
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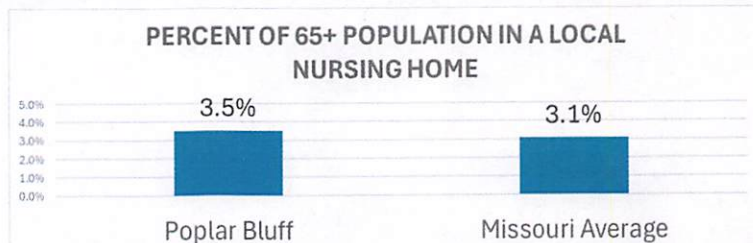
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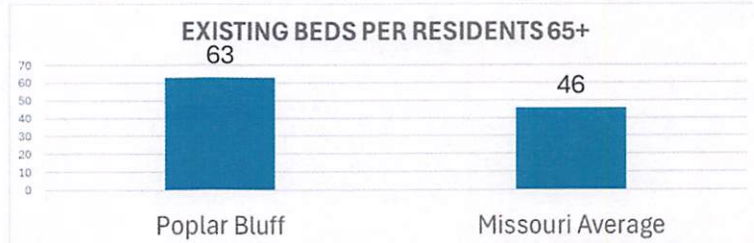
Our Community does not have the need for a new nursing home facility because the existing facilities already consistently have empty beds. Adding another facility would further strain current facilities making it harder for them to stay financially stable. It would also reduce available work hours and shifts for established employees impacting their livelihoods and job security.

Name and Relationship to Oakdale: *Josh Ligon Rehab Dept.*

POPLAR BLUFF NURSING HOME FACT SHEET

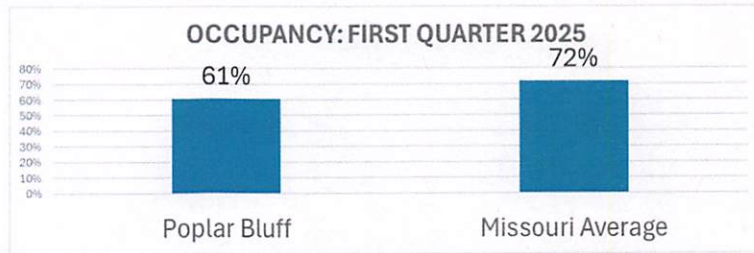
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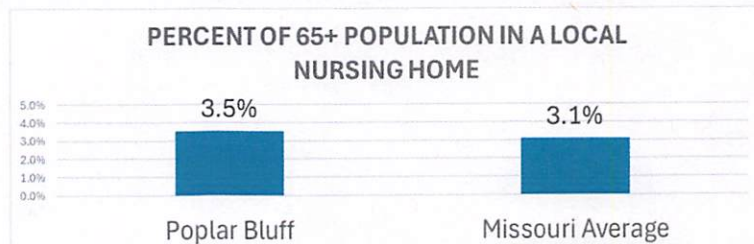
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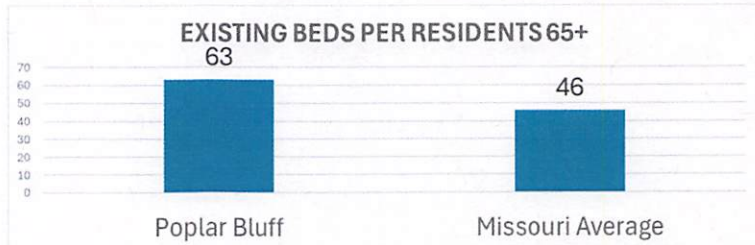
In my opinion, Poplar Bluff already has enough nursing home beds. There is currently a low occupancy rate per the data shown and many high-quality beds are unused. More facilities may not be necessary.

Name and Relationship to Oakdale: Jessica DeKen, PTA at Oakdale

POPLAR BLUFF NURSING HOME FACT SHEET

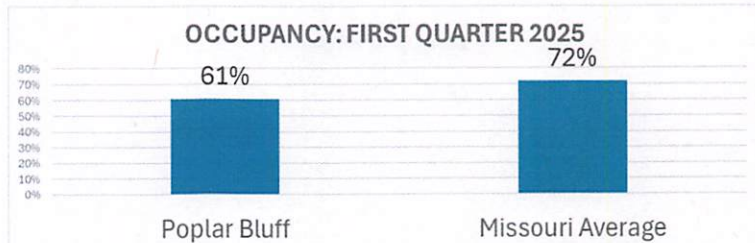
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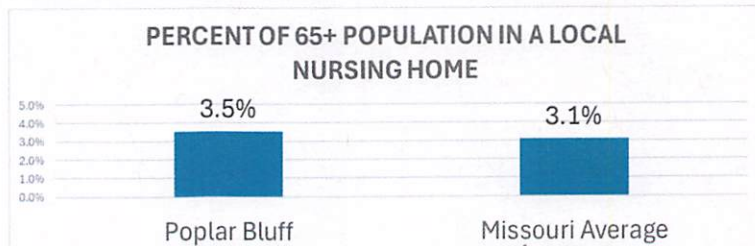
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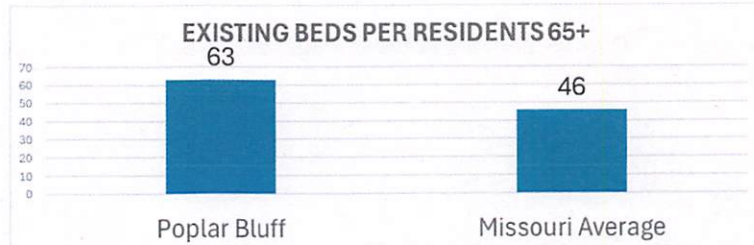
Poplar Bluff already has more than enough nursing home beds than needed, adding more beds doesn't make sense when current facilities like Oakdale offer excellent care and still have availability. Adding more beds would lower census in current homes, making it harder to maintain staffing. Let's support and strengthen our current facilities instead of overextending our resources.

Name and Relationship to Oakdale: Tiffany Green - Therapy Dept

POPLAR BLUFF NURSING HOME FACT SHEET

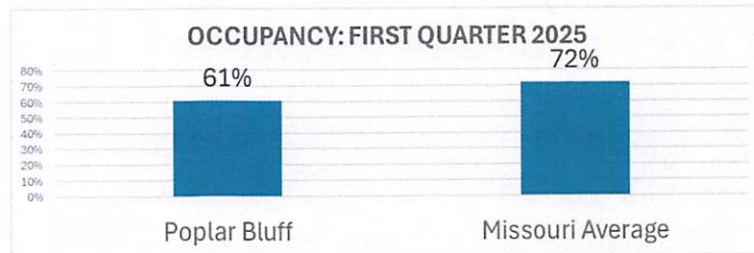
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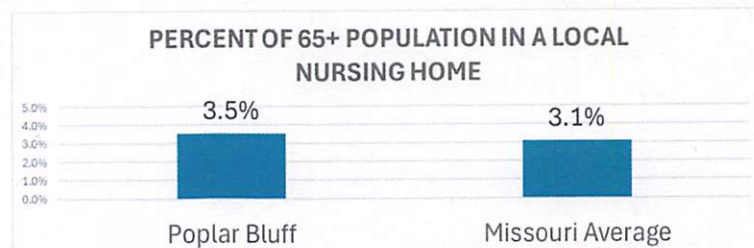
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I am in opposition to this! Our community has enough nursing homes, with great quality of care. An existing home should be purchased, not a new one built.

Name and Relationship to Oakdale: *Kaleb Johnson - LPN*

6/27/2025

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 an employee of a long term care facility in Southeast Missouri. Our residents, and their friends and family will be directly affected by this approval.

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.

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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 to utilize foreign staff how will this be beneficial to Poplar Bluff or Butler County.

I urge you to uphold the standards established by the Certificate of Need Committee on behalf of the residents of Butler County and the city of Poplar Bluff. Please take our viewpoint into account when it comes time to make your decision.

Respectfully,

Preston Edelman

6/27/2025

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6/27/2025

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Respectfully,

Beth Gilman

*Staffing Coordinator
The Manor*

6/27/2025

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A handwritten signature in black ink, appearing to read "Brandon Willin". The signature is written in a cursive, flowing style.

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Donna Millyan 6-27-25

6/27/2025

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6/27/2025

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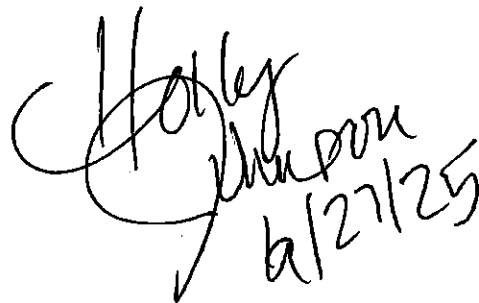
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Holly Johnson
6/27/25

6/27/2025

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Bobby Porch Du

6/27/2025

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6/27/2025

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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 an employee of a long term care facility in Southeast Missouri. Our residents, and their friends and family will be directly affected by this approval.

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I urge you to uphold the standards established by the Certificate of Need Committee on behalf of the residents of Butler County and the city of Poplar Bluff. Please take our viewpoint into account when it comes time to make your decision.

Respectfully,

A handwritten signature in cursive script that reads "Melica Wilkerson". The signature is written in dark ink and is positioned in the lower right area of the letter.

6/27/2025

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

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Respectfully,

Pedro Borders

6/27/2025

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P.O. Box 570
Jefferson City, MO 65102

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Respectfully,

A handwritten signature in cursive script that reads "Linda Pottle". The signature is written in dark ink and is located in the lower right portion of the document.

6/27/2025

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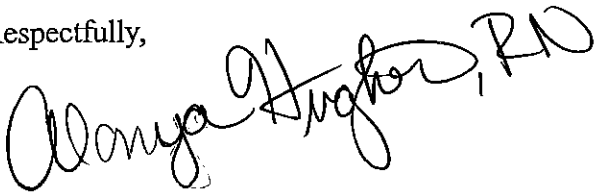
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Respectfully,

Alanya Hughes, RN

6/27/2025

Missouri Certificate of Need Program
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Jefferson City, MO 65102

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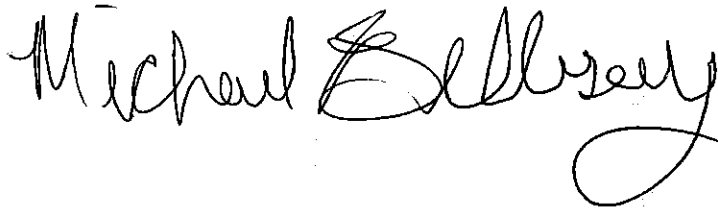
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Respectfully,

A handwritten signature in black ink, appearing to read "Michael Sells", with a large, stylized loop at the end.

6/27/2025

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P.O. Box 570
Jefferson City, MO 65102

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Respectfully,

Kara Caperton RN DON

Kara Caperton RN
Director of Nursing
The Manor

6/27/2025

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

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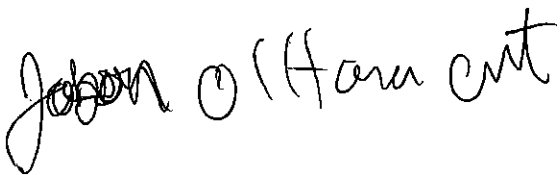
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Respectfully,

John O'Hara

6/27/2025

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Jefferson City, MO 65102

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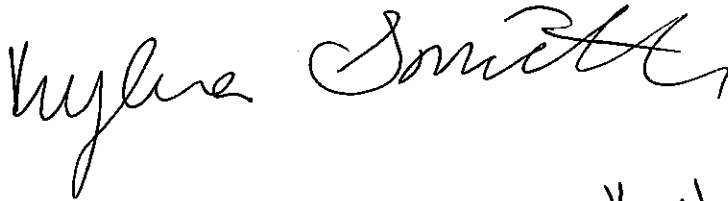
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Respectfully,



Hylea Smith

6/27/2025

Missouri Certificate of Need Program
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P.O. Box 570
Jefferson City, MO 65102

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A handwritten signature in black ink that reads "Jackie French". The signature is written in a cursive, flowing style with a large initial "J".

6/27/2025

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P.O. Box 570
Jefferson City, MO 65102

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Respectfully,

A handwritten signature in cursive script that reads "Sandy Griffin". The signature is written in dark ink and is positioned below the "Respectfully," text.

6/27/2025

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Respectfully,

A handwritten signature in black ink, appearing to be "K. Holcomb", written over the word "Respectfully,".



9 Bonneville Plaza, Bonne Terre MO 63628
3550 North Glenstone Ave. Ste. B, Springfield MO 65803

E. Turner Baur
Senior Director
Ozark LTC Rx, LLC

5-9-2025

Missouri Certificate of Need Program
Department of Health and Senior Services
P.O. Box 570
Jefferson City, MO 65102

Re: Opposition to the Issuance of a Sixth Skilled Nursing Facility License in Poplar Bluff, Missouri

To Whom It May Concern:

I am writing to respectfully express concerns regarding any consideration of issuing an additional skilled nursing facility (SNF) license in Poplar Bluff, Missouri. Based on current industry data and community trends, the introduction of a **sixth** facility would likely lead to negative impacts on both the quality of care and the financial sustainability of existing providers.

As of May 2025, Poplar Bluff is home to 5 licensed SNFs with a total of 520 certified beds. The average occupancy across these facilities varies but most recently stood at approximately 56% and it never approaches the 93% aggregate census to justify an increase in bed capacity. This quantitative reality suggests that the current capacity not only meets but exceeds the existing demand for skilled nursing services in the Poplar Bluff area. Introducing a new facility would likely result in further dilution of the resident population at the existing communities. This will most certainly lead to:

- 1. Reduced Staff-to-Resident Ratios and Quality of Care: Lower census across more facilities can spread clinical staffing thin, making it difficult to retain experienced caregivers and diminishing overall care quality.**
- 2. Financial Instability for Existing Providers: Undercutting census levels reduces Medicaid and Medicare reimbursement efficiency and increases per-resident costs, threatening the viability of long-standing facilities that have been key members of the Poplar Bluff community for generations.**

The Poplar Bluff area has not demonstrated the population growth or demographic shift necessary to justify increased bed licensure. Until utilization rates approach sustainable thresholds consistent with current Missouri Certificate of Need regulations, we believe approving a 6th license would be premature and detrimental. Not only is there not a quantitative need, but this proposal is also being made by an individual, whose existing facilities generate approximately a 2.0 star quality rating on average versus Poplar Bluff's existing SNF's producing approximately a 2.4 star on average quality rating. Clearly, the data on both the quantitative and the qualitative metrics argue against a 6th license from the proposing operator.

We urge the Certificate of Need Program to maintain the current licensing limit for skilled nursing facilities in Poplar Bluff in the interest of preserving quality care, fiscal responsibility, and long-term community health outcomes.

Thank you for your consideration.

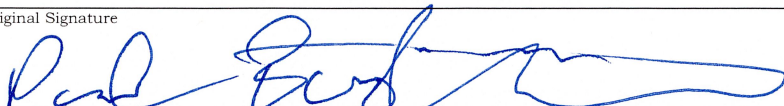
Sincerely,

E. Turner Baur
Senior Director
Ozark LTC Rx, LLC



Certificate of Need Program

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

Project Name Black River Skilled Nursing		Number #6205 NS																				
<i>(Please type or print legibly.)</i>																						
Name of Representative Paul Brothers		Title Attorney																				
Firm/Corporation/Association of Representative (may be different from below, e.g., law firm, consultant, other) Graves Garrett Greim		Telephone Number (816) 256-3181																				
Address (Street/City/State/Zip Code) 1100 Main Street, Suite 2700																						
Who's interests are being represented? <i>(If more than one, submit a separate Representative Registration Form for each.)</i>																						
Name of Individual/Agency/Corporation/Organization being Represented The Manor		Telephone Number (573) 686-1147																				
Address (Street/City/State/Zip Code) 2071 Baron Road, Poplar Bluff, MO 63901																						
<table border="0"><tr><td>Check one. Do you:</td><td>Relationship to Project:</td></tr><tr><td><input type="checkbox"/> Support</td><td><input checked="" type="checkbox"/> None</td></tr><tr><td><input checked="" type="checkbox"/> Oppose</td><td><input type="checkbox"/> Employee</td></tr><tr><td><input type="checkbox"/> Neutral</td><td><input type="checkbox"/> Legal Counsel</td></tr><tr><td></td><td><input type="checkbox"/> Consultant</td></tr><tr><td></td><td><input type="checkbox"/> Lobbyist</td></tr><tr><td></td><td><input type="checkbox"/> Other (explain):</td></tr><tr><td>Other Information:</td><td></td></tr><tr><td>_____</td><td>_____</td></tr><tr><td>_____</td><td>_____</td></tr></table>			Check one. Do you:	Relationship to Project:	<input type="checkbox"/> Support	<input checked="" type="checkbox"/> None	<input checked="" type="checkbox"/> Oppose	<input type="checkbox"/> Employee	<input type="checkbox"/> Neutral	<input type="checkbox"/> Legal Counsel		<input type="checkbox"/> Consultant		<input type="checkbox"/> Lobbyist		<input type="checkbox"/> Other (explain):	Other Information:		_____	_____	_____	_____
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	<input type="checkbox"/> Lobbyist																					
	<input type="checkbox"/> Other (explain):																					
Other Information:																						
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<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 		Date 07/08/2025																				



Paul E. Brothers
Phone: (816) 285-3844
Fax: (816) 256-5858
pbrothers@gravesgarrett.com

July 8, 2025

Via Electronic Mail

Missouri Health Facilities Review Committee
920 Wildwood Drive
Jefferson City, Missouri 65102
comp@health.mo.gov

Re: Opposition to CON Application #6205 NS: Black River Skilled Nursing.

Dear CON Committee Members:

On behalf of our client, the Manor, we write to respectfully voice opposition to the application for a Certificate of Need (CON), application number 6205 NS (Application), submitted by Black River Skilled Nursing (Black River) seeking to build a new 85-bed skilled nursing facility (SNF) at 2670 Shelby Road, Poplar Bluff, Missouri 63901. The Manor is a skilled nursing facility that has been providing residents of the Poplar Bluff area with quality care for over 40 years. The Manor is located less than two miles from the proposed Black River site and will be affected by Black River's proposed facility. RSMo § 197.305(1) (defining "Affected persons" and including in the definition "health care facilities within the service area in which the proposed health care service is to be developed.").

A new healthcare facility cannot be constructed in Missouri without a demonstrated need. RSMo § 197.315. However, there is simply no need for Black River's proposed facility. As prescribed by regulation, the bed need in the service area is already met, and a 27-bed surplus already exists. This project would increase the bed surplus in the service area four-fold.¹ Black River cannot overcome this surplus through their arguments that occupancy rates conclusively demonstrate numerous beds are not truly available within the service area or that the service area needs additional memory care beds. Additionally, Black River has not attempted to demonstrate at all that they will be able to overcome existing staffing challenges

¹ As discussed below, the regulation-based need formula shows an existing bed surplus of 27 beds. Black River's project would increase this surplus from 27 to 112 beds.

experienced in the service area. In short, Black River's project will dramatically increase an already existing bed surplus in the service area with additional unneeded beds, which will only serve to risk disrupting the continuum of quality skilled nursing care currently provided to seniors in the Poplar Bluff area.

I. The facts demonstrate that there is no need for the Black River project, which will increase the SNF bed surplus in the service area to 112 beds.

The area does not have a need for additional skilled nursing beds. The State's need methodology shows a current surplus of 27 beds within the 15-mile radius service area (the "service area").² Black River seeks to drastically expand this surplus to four-times its current size leaving the service area with a surplus of 112 beds. To justify the addition of these unnecessary beds, Black River asserts two cursory alternate arguments for why the Committee should ignore the existing bed surplus. Neither of these arguments are persuasive.

A. Occupancy Rates

First, Black River argues occupancy rates of current facilities within the service area provide an alternate basis for concluding there is actually a bed need.³ While the Committee indeed may conclude that the regulatory formula does not reflect market realities within the service area, Black River does not substantiate their conclusory assertion that low occupancy rates demonstrate licensed beds are unavailable.⁴

To arrive at this conclusion, Black River focuses on the six-quarter average occupancy rates of three of the five facilities within the service area and argues that based on the occupancy rates these facilities must have significantly less beds available than they have licensed. Black River utilizes a rudimentary calculation that

² As the Committee Staff noted in their Compendium, the 2030 population age 65+ in the 15-mile radius is approximately 9,289, which when applied to the regulatory specified service need rate of 53 beds per 1,000 population 65+ produces a need of approximately 493 beds. When the 520 existing licensed beds within the 15-mile radius are subtracted, a bed surplus of 27 beds is revealed. Certificate of Need Meeting Compendium (July 14, 2025, Meeting), #6205 NS, p. 2; see also 19 CSR 60-50.450(1)(A) (providing population-based long-term care bed need methodology for fifteen-mile radius for skilled nursing facility beds).

³ See Application #6205 NS, P. 68-77.

⁴ See 19 CSR 60-50.430(2)(E) (requiring applicants to provide additional documentation to substantiate why any proposed alternative Community Need Criteria and Standards should be used).

presumes every licensed but unoccupied bed within these facilities must not be available, which Black River then uses to remove 157 beds from the bed supply and argue a bed need actually exists within the service area. However, these conclusions only represent Black River's mere suppositions and are not evidence of the market realities within the service area.

A competing theory that is at least as plausible as Black River's is that the State's need methodology is not an accurate reflection of the market conditions in the service area, and there is not actually as large of a need for beds as the State's methodology assumes. In fact, conducting the State's need methodology at the ten- and five-mile radiuses suggest this may in fact be the case. The State's need methodology, when conducted at the ten-mile radius, produces a bed surplus of approximately 130 beds.⁵ The methodology produces a bed surplus of approximately 291 beds at the five-mile radius.⁶ Based on these surpluses, the low occupancy rates may be the byproduct of low demand, not unavailable beds. Black River's argument regarding occupancy rates is insufficient to demonstrate that the State's need methodology is inaccurate in its conclusion that the service area already has a surplus of beds and is not in need of additional beds.

B. Memory Care

Second, Black River asserts there is a need for 101 memory care beds within the service area that is currently being entirely unmet.⁷ Black River bases their conclusion that no memory care beds exist in the service area on the faulty premise that "Special Care Units" as defined by RSMO § 198.505 are the only option for SNFs to provide care to residents with Alzheimer's or dementia related diagnoses. However, this is not the case. A Special Care Unit is a facility, including a SNF, "that locks, secures, segregates or provides a special program or special unit for residents with a diagnosis of probable Alzheimer's disease or a related disorder, to prevent or limit access by a resident outside the designated or separated area; and that advertises,

⁵ The ten-mile radius has a 2030 projected 65+ population of approximately 7,347, which when applied to the regulatory specified service need rate of 53 beds per 1,000 population 65+ produces a need of approximately 390 beds. After the 520 licensed beds within the radius are accounted for, a bed surplus of approximately 130 beds exists.

⁶ The five-mile radius has a 2030 projected 65+ population of approximately 4,313, which when applied to the regulatory specified service need rate of 53 beds per 1,000 population 65+ produces a need of approximately 228 beds. After the 520 licensed beds within the radius are accounted for, a bed surplus of approximately 291 beds exists.

⁷ See Application #6205NS, P. 69-70, 78-101.

markets or otherwise promotes the facility as providing specialized Alzheimer's or dementia care services." RSMO § 198.505. Thus, the distinctive feature of a Special Care Unit is preventing or limiting residents with Alzheimer's dementia from accessing non-designated or separated areas of the facility.

However, facilities can—and—do accommodate residents with Alzheimer's and dementia without segregating these residents to a separate or designated portion of the facility. As an example, The Manor currently offers 30 memory care beds, of which approximately 20 are filled, even though these beds are not classified as Special Care Units. Further, any existing facility can add Special Care Units in short order. All a facility needs to do to establish Special Care Units is begin providing qualifying services (separately securing or segregating the residents to prevent or limit access outside of a designated or separated area) and file a disclosure form with the State during the facility's licensure renewal process. RS MO §§ 198.505, 198.510; see form MO 580-2637. Thus, Special Care Units are not required to provide care to people with Alzheimer's disease or dementia nor is a new facility required if Special Care Units are indeed needed within the service area as existing facilities may easily fulfil any need.

Additionally, it is not apparent that such a need for memory care beds exists. Black River's assertion is based on one national statistic regarding the incidence of Alzheimer's dementia in the 65+ population and is not based on any localized market study or analysis.⁸ Indeed, the actual facts on the ground, specifically, The Manor's 10 unoccupied memory care beds, indicates such a need does not exist as it is reasonable to assume that if there was a critical unmet need for memory care beds within the service area these beds would be occupied. The availability of these beds indicates the need for memory care beds in the service area, which Black River bases on a single national statistic, may not in reality be as great as Black River suggests.

Finally, Black River's reliance on memory care beds attempts to mask the larger issue of adding a significant number of additional surplus beds to the service area. Memory care units only make up 20 of Black River's proposed 85 beds, or only 23.5%. For the sake of argument, even if Black River's proposed memory care beds are excluded, Black River still proposes adding 65 unneeded surplus beds to the service area. These 65 beds would increase the bed surplus within the service area to 92 beds, which represents a three-fold increase of the existing bed surplus.

⁸ See Application #6205NS, P. 69-70, 101.

II. Adding additional unnecessary beds to the service area will exacerbate existing staffing challenges and threaten the continuum and quality of care currently offered.

If the Committee were to approve the Application and further increase the surplus of beds in the service area, already existing staffing challenges would be greatly exacerbated. For some time now, SNFs within the service area, including The Manor, have struggled with obtaining and maintaining the requisite staffing to operate their facilities at optimal levels. In short, there is simply not a large enough pool of nurses, therapists, aids, and other professionals to go around. Adding a new facility and additional beds to the service area will not increase the pool of available professionals to service these facilities. Instead, the result will be increased turnover and costs as facilities compete for an already limited pool of professionals. Ultimately, these effects will be felt directly by residents within the service areas as they face increased risk to the continuum and quality of care currently being provided in the service area.

Conclusion

Missouri law requires that new health care facilities not be constructed absent a demonstrated need. Regulations provide a baseline, formulaic need analysis on which the Committee can make the need determination. Those regulations are not so rigid that market realities cannot be considered, and it is reasonable to do so. However, the market realities within Black River's proposed service area do not demonstrate a need for 85 new SNF beds. Rather, the market realities and law comport with the regulation's guidance; there is a surplus of SNF beds within the service area, and the existing beds are capable of providing the very services Black River argues are particularly needed. Moreover, the facts indicate that Black River's proposed project would exacerbate staffing strains within the market, which would threaten the continuum of quality care currently provided to seniors in the service area in a manner that the Certificate of Need process was designed to avoid. The CON Committee's stated goals include containing costs, promoting economic value, evaluating competing interests, and preventing unnecessary duplication. 19 CSR 60-50.200(2). Approval here would contravene those purposes as the Black River project is simply not needed in the Poplar Bluff area.

For these reasons, The Manor respectfully requests that the CON Committee deny Black River's application #6205.



Sincerely,

A handwritten signature in blue ink, reading 'Paul E. Brothers', is positioned below the word 'Sincerely,'.

Paul E. Brothers

Cc: Alison Dorge, Program Coordinator-Certificate of Need Program-
alison.dorge@health.mo.gov

Mackenzie Fick, Assistant Program Coordinate-Certificate of Need Program-
mackinzey.fick@health.mo.gov



Certificate of Need Program

REPRESENTATIVE REGISTRATION

(A registration form must be completed for each project presented.)	
Project Name NS: Black River Skilled Nursing	Number 6205
(Please type or print legibly.)	
Name of Representative Stephen P Miller	Title President
Firm/Corporation/Association of Representative (may be different from below, e.g., law firm, consultant, other) Oakdale Care Center -and- Westwood Hills Health and Rehabilitation Center	Telephone Number (312) 399-5165
Address (Street/City/State/Zip Code) 2702 Debbie Ln, Poplar Bluff, MO 63901 -and- 3100 Warrior Ln, Poplar Bluff, MO 63901	
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 Oakdale Care Center -and- Westwood Hills Health and Rehabilitation Center	Telephone Number (312) 399-5165
Address (Street/City/State/Zip Code) 2702 Debbie Ln, Poplar Bluff, MO 63901 -and- 3100 Warrior Ln, Poplar Bluff, MO 63901	
Check one. Do you: <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose <input type="checkbox"/> Neutral	Relationship to Project: <input type="checkbox"/> None <input type="checkbox"/> Employee <input type="checkbox"/> Legal Counsel <input type="checkbox"/> Consultant <input type="checkbox"/> Lobbyist <input checked="" type="checkbox"/> Other (explain): Owner of existing SNFs
Other Information: _____ _____	
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>	
Original Signature	Date July 8, 2025



Certificate of Need Program

REPRESENTATIVE REGISTRATION

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

Project Name Black River Skilled Nursing		Number 6205NS
(Please type or print legibly.)		
Name of Representative Joetta Martin		Title Administrator
Firm/Corporation/Association of Representative (may be different from below, e.g., law firm, consultant, other) Westwood Hills Idealth + Rehabilitation Center		Telephone Number 573-785-0851
Address (Street/City/State/Zip Code) 3100 Warrior Lane Poplar Bluff, MO 63901		
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 Westwood Hills Idealth + Rehabilitation Center		Telephone Number 573-785-0851
Address (Street/City/State/Zip Code) 3100 Warrior Lane Poplar Bluff, MO 63901		
Check one. Do you: <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose <input type="checkbox"/> Neutral		Relationship to Project: <input type="checkbox"/> None <input checked="" type="checkbox"/> Employee of Westwood Hills <input type="checkbox"/> Legal Counsel <input type="checkbox"/> Consultant <input type="checkbox"/> Lobbyist <input type="checkbox"/> Other (explain):
Other Information: _____		_____
<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: 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.</p>		
Original Signature Joetta Martin		Date 7-8-25

CAPITOL OFFICE

Room 305-B, State Capitol
201 West Capitol Avenue
Jefferson City, MO 65101

Office: (573) 751-4085
Donnie.Brown@house.mo.gov

LEGISLATIVE CHIEF OF STAFF

Wanda Mehrhoff
Wanda.Mehrhoff@house.mo.gov



Donnie Brown

Missouri House of Representatives
District 149



CHAIR

Subcommittee on Appropriations -
Public Safety, Corrections,
Transportation and Revenue

VICE-CHAIR

Transportation

COMMITTEES

Agriculture

Budget

Joint Committee on Transportation
Oversight

Missouri Certificate of Need Program

Attn: Alison Dorge

P.O. Box 570

Jefferson City, Missouri 65102

June 17, 2025

RE: New Skilled Nursing Facility in Poplar Bluff, Missouri
Paradigm Senior Living

Dear Mrs. Dorge,

This letter is written in support of Paradigm Senior Management's ("Paradigm") proposal to construct a brand new, state of the art, 85-bed skilled nursing facility in Poplar Bluff, Missouri. The community in Poplar Bluff is in serious need of a new long-term care facility such as the one proposed by Paradigm. The families in this area are now traveling long distances for the care that they could be receiving much closer to their homes.

Paradigm has a proven track record of developing and operating skilled nursing facilities. The addition of this new facility will be a fantastic, and much needed addition to the community in Poplar Bluff, Missouri.

With utmost respect, I urge the MHFRC to recognize the need for this skilled nursing facility, and to vote in support of this project.

Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Donnie Brown". The signature is written in a cursive style with a large, looped "D" and a trailing "B".

Donnie Brown - State Representative – District 149



May 1, 2025

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

RE: *New Skilled Nursing Facility in Poplar Bluff, Missouri*
Paradigm Senior Living

Dear Mrs. Dorge:

This letter is written in support of Paradigm Senior Management's ("Paradigm") proposal to construct a brand new, state of the art, 85-bed skilled nursing facility in Poplar Bluff, Missouri. The community in Poplar Bluff is in serious need of a new long-term care facility such as the one proposed by Paradigm.

Paradigm has a proven track record of developing and operating skilled nursing facilities. The addition of this new facility will be a fantastic, and much needed addition to the community in Poplar Bluff, Missouri.

I urge the MHFRC to recognize the need for this skilled nursing facility, and to vote in support of this project.

Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Darnell". The signature is fluid and cursive, with a large, sweeping "J" and a long, horizontal stroke at the end.

Jeff Darnell
Public Administrator
Butler County



Butler County Public Administrator

100 N. Main St.
Butler County Courthouse
Poplar Bluff, MO 63901

Phones: 573-686-8078

May 1, 2025

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

RE: *New Skilled Nursing Facility in Poplar Bluff, Missouri*
Paradigm Senior Living

Dear Mrs. Dorge:

This letter is written in support of Paradigm Senior Management's ("Paradigm") proposal to construct a brand new, state of the art, 85-bed skilled nursing facility in Poplar Bluff, Missouri. The community in Poplar Bluff is in serious need of a new long-term care facility such as the one proposed by Paradigm.

Paradigm has a proven track record of developing and operating skilled nursing facilities. The addition of this new facility will be a fantastic, and much needed addition to the community in Poplar Bluff, Missouri.

I urge the MHFRC to recognize the need for this skilled nursing facility, and to vote in support of this project.

Thank you for your time and attention to this matter.

Sincerely,

Candi Morris
Deputy Public Admin.

Concerned Citizen
Poplar Bluff, Missouri



Butler County Public Administrator

100 N. Main St.
Butler County Courthouse
Poplar Bluff, MO 63901

Phones: 573-686-8078

May 1, 2025

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

RE: *New Skilled Nursing Facility in Poplar Bluff, Missouri*
Paradigm Senior Living

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Paradigm has a proven track record of developing and operating skilled nursing facilities. The addition of this new facility will be a fantastic, and much needed addition to the community in Poplar Bluff, Missouri.

I urge the MHFRC to recognize the need for this skilled nursing facility, and to vote in support of this project.

Thank you for your time and attention to this matter.

Sincerely,

Melissa Berger - Deputy Public Administrator
for Butler County

Concerned Citizen
Poplar Bluff, Missouri



Butler County Public Administrator

100 N. Main St.
Butler County Courthouse
Poplar Bluff, MO 63901

Phones: 573-686-8078

May 1, 2025

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

RE: *New Skilled Nursing Facility in Poplar Bluff, Missouri*
Paradigm Senior Living

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Paradigm has a proven track record of developing and operating skilled nursing facilities. The addition of this new facility will be a fantastic, and much needed addition to the community in Poplar Bluff, Missouri.

I urge the MHFRC to recognize the need for this skilled nursing facility, and to vote in support of this project.

Thank you for your time and attention to this matter.

Sincerely,

Michelle Nelson Deputy Public Administrator
for Butler County

Concerned Citizen
Poplar Bluff, Missouri



Butler County Public Administrator

100 N. Main St.

Butler County Courthouse

Poplar Bluff, MO 63901

Phones: 573-686-8078

May 1, 2025

Missouri Certificate of Need Program

Attn: Alison Dorge

P.O. Box 570

Jefferson City, Missouri 65102

RE: *New Skilled Nursing Facility in Poplar Bluff, Missouri*
Paradigm Senior Living

Dear Mrs. Dorge:

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Paradigm has a proven track record of developing and operating skilled nursing facilities. The addition of this new facility will be a fantastic, and much needed addition to the community in Poplar Bluff, Missouri.

I urge the MHFRC to recognize the need for this skilled nursing facility, and to vote in support of this project.

Thank you for your time and attention to this matter.

Sincerely,

Valerie Kiefer (Deputy Public Administrator)

Concerned Citizen
Poplar Bluff, Missouri



May 1, 2025

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

RE: *New Skilled Nursing Facility in Poplar Bluff, Missouri*
Paradigm Senior Living

Dear Mrs. Dorge:

This letter is written in support of Paradigm Senior Management's ("Paradigm") proposal to construct a brand new, state of the art, 85-bed skilled nursing facility in Poplar Bluff, Missouri. The community in Poplar Bluff is in serious need of a new long-term care facility such as the one proposed by Paradigm.

Paradigm has a proven track record of developing and operating skilled nursing facilities. The addition of this new facility will be a fantastic, and much needed addition to the community in Poplar Bluff, Missouri.

I urge the MHFRC to recognize the need for this skilled nursing facility, and to vote in support of this project.

Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Cool".

Concerned Citizen
Poplar Bluff, Missouri



Butler County Emergency Management Agency

Robbie Myers, MBA
Director

May 2, 2025

Missouri Certificate of Need Program

Attn: Alison Dorge

P.O. Box 570

Jefferson City, Missouri 65102

RE: New Skilled Nursing Facility in Poplar Bluff, Missouri

Paradigm Senior Living

Dear Mrs. Dorge:

This letter is written in support of Paradigm Senior Management's ("Paradigm") proposal to construct a brand new, state of the art, 85-bed skilled nursing facility in Poplar Bluff, Missouri.

Public safety for our most vulnerable citizens is enhanced with the availability of long-term care facilities such as the one proposed by Paradigm. Paradigm has a proven track record of developing and operating skilled nursing facilities. The building of this new facility will be a fantastic addition to the community in Poplar Bluff, Missouri. I urge the MHFRC to recognize the need for this skilled nursing facility, and to vote in support of his project.

Thank you for your time and attention to this matter.

Respectfully,

A handwritten signature in black ink that reads "Robbie Myers".

Robbie Myers, MBA

Butler County Emergency Management Director

614 Lindsay Avenue • Poplar Bluff, MO 63901

(573) 872-7585

director@butlercoema.org



Working Today For A Better Tomorrow

Butler County Collector

Emily Parks

100 N. Main
Poplar Bluff, MO 63901
Phone 573-686-8088
Fax 573-778-8039

May 2, 2025

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

RE: *New Skilled Nursing Facility in Poplar Bluff, Missouri*
Paradigm Senior Living

Dear Mrs. Dorge:

This letter is written in support of Paradigm Senior Management's ("Paradigm") proposal to construct a brand new, state of the art, 85-bed skilled nursing facility in Poplar Bluff, Missouri. The community in Poplar Bluff is in serious need of a new long-term care facility such as the one proposed by Paradigm. I know this firsthand as my 73-year-old Mother was just diagnosed with Lewy Body Dementia and Alzheimer's, and at this time there is not a single skilled nursing facility that I would place any family member, much less my mother.

Paradigm has a proven track record of developing and operating skilled nursing facilities. The addition of this new facility will be a fantastic, and much needed addition to the community in Poplar Bluff.

I urge the MHFRC to recognize the need for this skilled nursing facility, and to vote in support of this project.

Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in blue ink that reads "Emily Parks".

Emily Parks
Butler County Collector



P.O. BOX 1009 POPLAR BLUFF, MISSOURI 63902-1009 PHONE 573-785-8265
May 1, 2025

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

***RE: New Skilled Nursing Facility in Poplar Bluff, Missouri
Paradigm Senior Living***

Dear Mrs. Dorge:

This letter is written in support of Paradigm Senior Management's ("Paradigm") proposal to construct a brand new, state of the art, 85-bed skilled nursing facility in Poplar Bluff, Missouri. The community in Poplar Bluff is in serious need of a new long-term care facility such as the one proposed by Paradigm.

Paradigm has a proven track record of developing and operating skilled nursing facilities. The addition of this new facility will be a great, and much needed addition to the community in Poplar Bluff, Missouri.

I urge the MHFRC to recognize the need for this skilled nursing facility, and to vote in support of this project.

Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Rebeca Pacheco".

Rebeca Pacheco, MBA, PHM
Deputy Director
Poplar Bluff Housing Authority



Extension

University of Missouri



May 1, 2025

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

*RE: New Skilled Nursing Facility in Poplar Bluff, Missouri
Paradigm Senior Living*

Dear Mrs. Dorge:

This letter is written in support of Paradigm Senior Management's ("Paradigm") proposal to construct a brand new, state of the art, 85-bed skilled nursing facility in Poplar Bluff, Missouri. The community in Poplar Bluff is in serious need of a new long-term care facility such as the one proposed by Paradigm.

Paradigm has a proven track record of developing and operating skilled nursing facilities. The addition of this new facility will be a fantastic, and much needed addition to the community in Poplar Bluff, Missouri.

I urge the MHFRC to recognize the need for this skilled nursing facility, and to vote in support of this project.

Thank you for your time and attention to this matter.

Sincerely,

Concerned Citizen
Poplar Bluff, Missouri



United Gospel
— RESCUE MISSION —
Transforming Lives through Christ

Pastor Gregory Kirk
Executive Director

P.O. Box 924
Poplar Bluff, MO 63902
573-785-4683
donors@pbrescue.org

May 5, 2025

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

***RE: New Skilled Nursing Facility in Poplar Bluff, Missouri
Paradigm Senior Living***

Dear Mrs. Dorge:

This letter is written in support of Paradigm Senior Management's ("Paradigm") proposal to construct a brand new, state of the art, 85-bed skilled nursing facility in Poplar Bluff, Missouri. The community in Poplar Bluff is in serious need of a new long-term care facility such as the one proposed by Paradigm.

Paradigm has a proven track record of developing and operating skilled nursing facilities. The addition of this new facility will be a fantastic, and much needed addition to the community in Poplar Bluff, Missouri.

I urge the MHFRC to recognize the need for this skilled nursing facility, and to vote in support of this project.

Thank you for your time and attention to this matter.

Sincerely,

Dr. Gregory Kirk, D.Ed.Min
Executive Director



May 1, 2025

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

RE: *New Skilled Nursing Facility in Poplar Bluff, Missouri*
Paradigm Senior Living

Dear Mrs. Dorge:

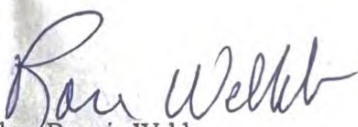
This letter is written in support of Paradigm Senior Management's ("Paradigm") proposal to construct a brand new, state of the art, 85-bed skilled nursing facility in Poplar Bluff, Missouri. The community in Poplar Bluff is in serious need of a new long-term care facility such as the one proposed by Paradigm.

Paradigm has a proven track record of developing and operating skilled nursing facilities. The addition of this new facility will be a fantastic, and much needed addition to the community in Poplar Bluff, Missouri.

I urge the MHFRC to recognize the need for this skilled nursing facility, and to vote in support of this project.

Thank you for your time and attention to this matter.

Sincerely,


Bishop Ronnie Webb
Mt. Calvary Powerhouse Church
Poplar Bluff Missouri

Cynthia Gewinner
385 Radiant Lane
Poplar Bluff, Missouri 63901

June 5, 2025

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

***RE: New Skilled Nursing Facility in Poplar Bluff, Missouri
Paradigm Senior Management***

Dear Mrs. Dorge:

I am a resident of Poplar Bluff, Missouri, and I am writing to encourage the approval of Paradigm Management's proposed new-build nursing home here.

In 2022, my mom needed a nursing home so my dad and I toured the options available in Poplar Bluff. We visited Westwood Hills, Oakdale Care Center, Cedargate Healthcare, The Manor, Mark Twain Caring Center, and River Mist. Of the lot, only River Mist gave the homey, residential atmosphere that felt comfortable to us, however they could not accommodate my mom's condition. The others all felt old, institutional and did not look or smell clean.

This led us to look in the surrounding communities, including Puxico, Dexter, Bloomfield and beyond. When we visited Paradigm's Winchester Place in Bernie, the updated décor, wide hallways and cheerful employees immediately impressed us. Although this was 40 minutes from home, we chose to put Mom there. In the first week, the Food Services director met with us to ask if there were any favorite foods or meals that they could make sure to stock for Mom; the regular visiting doctor met with us to review Mom's history, medications and specific concerns, and the physical therapist sat down with us and discussed what Mom needed and what they recommended as a care and treatment plan. While Mom was at Winchester, we saw the staff interact with the residents in outgoing and friendly manners, spending time with those keeping to themselves and trying to involve everyone in the activities that were presented. Sadly, the distance became too much of an obstacle for Dad and me, and we decided to move her to a Poplar Bluff nursing home. Mom stayed at Oakdale and at Mark Twain. In both places, we ran into unclean floors, bedding not changed daily, no effort to involve Mom in activities or to help her eat. Also, it was not always easy to find staff when we had questions and concerns.

I am strongly in favor of a new, state-of-the-art facility in Poplar Bluff. I believe the families in our community deserve a local nursing care facility where loved ones will get caring attention in a comfortable environment. In my experience, Paradigm's management practices promote and encourage care that is respectful of the patients and their families.

Poor previous experiences with current PB homes

- Old institutions (schools, hospitals) repurposed as nursing homes
- Dirty floors, unpleasant smells
- People left alone in their rooms
- Can't find a staff member on the entire hall
- Staff unfamiliar with patient's individual issues, dismissive of family's input on what to watch for; think they know what's best

Winchester Place, a Paradigm property

- Staff approachable, receptive and responsive; cheerful, courteous and enthusiastic
- Staff members show genuine interest in and affection for residents
- Atmosphere is warm, pleasant, clean, bright, smells good
- Frequent activities and residents actively encouraged to participate

Sincerely,

A handwritten signature in cursive script that reads "Cynthia Gewinner". The signature is written in dark ink and has a fluid, connected style.

Cynthia Gewinner

Tammy Freeman-Hopkins
130 Buck Rub Lane
Poplar Bluff, Missouri 63901

May 26, 2025

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

***RE: New Skilled Nursing Facility in Poplar Bluff, Missouri
Paradigm Senior Management***

Dear Mrs. Dorge:

I am writing to formally express my deep concern and dissatisfaction with the level of care and professionalism consistently demonstrated by the staff and administration at *The Manor* nursing facility. As both a member of the community and the family member of a former resident, I find it imperative to bring to your attention the unacceptable conduct and lack of accountability I and many others have witnessed firsthand.

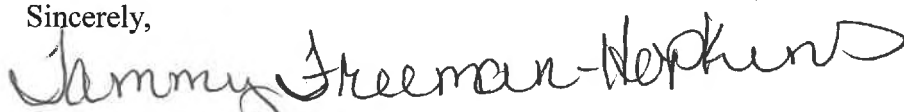
The Manor has developed a concerning reputation for treating both patients and their families with rudeness and a lack of compassion. Interactions with staff are often dismissive and unprofessional, and there appears to be a significant deficit in communication and responsiveness when it comes to the needs of their residents. It is no surprise that the facility has experienced a steady loss of residents, many of whom have transferred to other nursing homes due to this recurring pattern of neglect and poor treatment.

Tragically, my own mother was a resident at *The Manor*, and during her time there, she was allowed to leave the premises unsupervised. My mother suffers from dementia, and due to the staff's gross negligence, she became lost. The situation was so dire that the police had to be involved to help locate her. This incident was not only traumatic for her but devastating for our family and entirely avoidable had proper supervision and protocols been in place.

Following this event, my mother was transferred to a secure memory care facility, *Memory Lane*. The contrast in care has been nothing short of extraordinary. *Memory Lane* has done everything possible to create a safe, comforting, and welcoming environment for its residents. The staff have been professional, empathetic, and accommodating—not only to my mother, but to our entire family as we navigated this difficult transition. They assisted us every step of the way, ensuring my mother's needs were met and that we felt informed and supported throughout the process. It is my hope that by sharing this letter, attention is drawn to the serious issues present at *The Manor*, and that appropriate steps will be taken to improve the quality of care and respect offered to current and future residents. No family should have to endure what ours did.

The current facility that my mother is in is Memory Lane, they are about 20-25 miles from me which on one hand is not that far but on the other with having a full-time job and family it makes in hard at times to be able to visit her as much as I was when she was at the Manor. There is no full secured facility in Poplar Bluff Mo, there are several nursing homes but none of them are fully secured and I know of other who have had to have their family members moved to Memory Lane due to lack of security at the ones located here in Poplar Bluff.

Sincerely,


Tammy Freeman-Hopkins

May 21, 2025

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

RE: New Skilled Nursing Facility in Poplar Bluff, Missouri Paradigm Senior Living

Dear Mrs. Dorge:

I am writing this letter in support of Paradigm Health Systems' plan for a new skilled nursing facility in the Poplar Bluff Region.

In June of 2024, my mother was diagnosed with stage IV uterine cancer. This was a shock because this 78-year-old mother of three continued to work part-time, drove her and her grandchildren everywhere, and lived independently in a midtown apartment. On weekends, Mom met friends for dinner and visited her children regularly.

The cancer diagnosis was treated with six months of chemotherapy, as my sister and I took turns staying every other night after she lost her ability to walk independently. Later, she would require 24-hour care after cancer had ravaged her central nervous system, robbing her of independence. After her chemotherapy treatments, skilled nursing was prescribed to continue physical and occupational therapy. It was also agreed that her children could no longer commit to 24-hour care due to family and job commitments. We then learned how the nursing home system had changed over the last 10 years.

My father suffered a series of strokes around 10 years ago, and after attempting to care for him in my sister's home, it was decided that Dad required the care of a skilled nursing facility. We found Oakdale Nursing Home was perfect for his needs. We were very pleased with his level of care, and the facilities, and the staff were like family. Dad remained there until his death on April 15, 2015.

We started our search for a facility for Mom in January of 2024. We were shocked to find out the decline the Oakdale facility had suffered since our last experience. Nothing seemed to have been updated, the paint, the lighting, and we understood that Oakdale has a high rate of turnover in its staff. When we looked for other facilities, we were surprised to find that Oakdale was the only place that offered single occupancy rooms. The next closest option was more than 30 miles away in Dexter, but it had a long waiting list. We explored other options, but it was determined that Oakdale was the best of the terrible options available. We firmly believe that socialization is crucial to the overall health and the best plan of care for my mother, and the distance would greatly restrict the number of visits from friends and family.

I am also very aware of friends who have made the agonizing decision to move their loved one to facilities over an hour away, so that they may receive the level of care that a skilled nursing facility can provide.

After speaking with Ben Sells of Paradigm Health Systems, I am convinced that others in this area would benefit from his offer of help to our region, and I fully support his request for a Certificate of Need.

Sincerely,



Chris Rushin
1904 CR 525
Williamsville, Mo. 63907

The McNew Family
631 County Road 538
Poplar Bluff, Missouri 63901

June 16, 2025

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

***RE: New Skilled Nursing Facility in Poplar Bluff, Missouri
Paradigm Senior Management***

Dear Mrs. Dorge:

The reason why our family decided to take our mother (Dortha McNew) to Memory Lane of Dexter is because they specialize in Alzheimer's dementia care. They are also a secured facility, which is vital for a person with this disease. They provide therapy, activities, and personal care. I like that they have a secured courtyard that is inviting and well maintained. This facility is designed to feel like home, which is very important to us also. The staff are professionally trained in nursing and certified in Alzheimer's dementia care.

We had our mother in two of the facilities in Poplar Bluff. They didn't have any of these qualities or the training for this type of care. The one facility that mom was in, there were incidents that happened and I found out they were never documented. She got out a window and found out it didn't even have a lock on it. She also had a lot of sores on her that they kept trying to make excuses for why she had them, but they were never treated. They had at several occasions had bed bugs and lice. My mother's health issues were never documented on her chart. The dinning room was always dirty with food on the floor and tables. We went to the other facilities in our area and they were not any better.

We recommend Memory Lane to everyone that ask us about care for their loved one.

Sincerely,

A handwritten signature in cursive script that reads "Veronica Pruitt".

The McNew Family

Katina Humphrey
912 South 9th Street
Poplar Bluff, Missouri 63901

May 26, 2025

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

***RE: New Skilled Nursing Facility in Poplar Bluff, Missouri
Paradigm Senior Management***

Dear Mrs. Dorge:

I am pleased that I found Memory Lane for my father-in-law. My husband and I first had him placed in a facility in Poplar Bluff that sadly after just shy of 2 weeks were given news that he couldn't stay unless we sent him to a mental hospital. My husband and I were so heartbroken and didn't know where to turn. I had started making calls the next day and came across Memory Lane of Dexter. We immediately went to the facility to take a look and speak with them. We made of decisions based of the cleanliness, kindness, respect given for residents, and the knowledge all of the staff have with dementia and Alzheimer's patients. Memory Lane understands the levels and progression of the disease and never refers to anyone being crazy. The staff are so wonderful and we are very grateful for all of them and a facility that specializes in the disease. The only down fall is even though Dexter is a short distance we wish so much that they had a facility here in Poplar Bluff.

Sincerely,



Katina Humphrey

The Lawson Family
2806 Cravens Road
Poplar Bluff, Missouri 63901

June 2, 2025

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

***RE: New Skilled Nursing Facility in Poplar Bluff, Missouri
Paradigm Senior Management***

Dear Mrs. Dorge:

Just to say we do like the Memory Lane in Dexter; our mother Phyllis Lawson receives great care here. We chose Memory Lane because Poplar Bluff has no place that specializes in Memory Care. It would be great service to have a special care center in Poplar Bluff. We have a 45-minute drive, and we could come visit more often. Even if she may not remember each and every time we come to visit, it makes us feel better in our hearts to see her and are pleased each time we have visited on how she is being treated and cared for.

Sincerely,

The Lawson Family

Mark & Susan Lawson

Joseph M. Leahy, PE
5806 Melissa Lane
Poplar Bluff, Missouri 63901

May 5, 2025

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

**RE: *New Skilled Nursing Facility in Poplar Bluff, Missouri
Paradigm Senior Living***

Dear Mrs. Dorge:

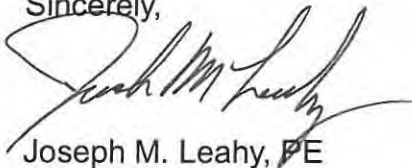
I am writing this letter to support Paradigm Senior Management's ("Paradigm") proposal to construct a brand new, state of the art, 85-bed skilled nursing facility in Poplar Bluff, Missouri. The community in Poplar Bluff is growing and in serious need of a new long-term care facility such as the one proposed by Paradigm.

Paradigm has a proven track record of developing and operating skilled nursing facilities. The addition of this new facility will be a great feature and addition to our community. This much needed addition to Poplar Bluff and the surrounding communities will greatly help families be close to and care for their loved ones.

I urge the MHFRC to recognize the need for this skilled nursing facility, and to vote in support of this project.

Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph M. Leahy". The signature is stylized with a large, sweeping initial "J" and a long, horizontal flourish extending to the right.

Joseph M. Leahy, PE

Charles Stratton
322 County Road 4702
Poplar Bluff, Missouri 63901

May 26, 2025

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

***RE: New Skilled Nursing Facility in Poplar Bluff, Missouri
Paradigm Senior Management***

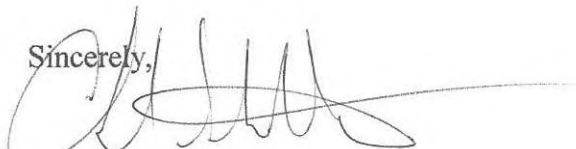
Dear Mrs. Dorge:

I am writing to share my sincere support for a new nursing facility in Poplar Bluff.

I was at first impressed with the Director, Michelle Chism. She was knowledgeable, extremely helpful and seemed to genuinely care. She even gave me her cellphone number in case we encountered any issues. Upon visiting the facility, I found it to be fresh, clean, well-staffed and secure. It was always like that from the time Mom entered until she eventually passed there. Most places smell of urine and body odors, but I never experienced that with Memory Lane. The staff were kind, helpful and engaging with the residents. Every time I was there, they were mingling with the residents and had them involved with various activities constantly, not just "warehousing" the residents waiting for them to pass away.

I could go on and on, however, suffice it to say they would be a breath of fresh air if allowed to open a facility in the Poplar Bluff area. I wholeheartedly support their application and am willing to provide any assistance I can in obtaining their CON.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Charles Stratton', with a long, sweeping horizontal line extending to the right.

Charles (Chuck) Stratton
Poplar Bluff, Missouri 63901
(573)776-5335

Jenny Blackman
66 County Road 279
Neelyville, MO 63954

June 11, 2025

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

***RE: New Skilled Nursing Facility in Poplar Bluff, Missouri
Paradigm Senior Management***

Dear Mrs. Dorge:

This letter is written in support of Paradigm Senior Management's proposal to construct a brand new, state-of-the-art, skilled nursing facility in Poplar Bluff, Missouri.

In 2025, I chose to move my husband to Winchester Nursing Center in Bernie, Missouri from a local nursing facility. I had heard about the Winchester Nursing facility. and when I visited the facility, I was very impressed. It was very well maintained and clean and free of odors. I feel the residents are very well taken care of. I felt very comfortable admitting my husband to Winchester.

Therefore, I support Paradigm Senior Management's proposal to build a new state of the art facility in Poplar Bluff, Missouri. I believe this facility will be a much-needed addition to the Poplar Bluff area.

Thank you for your attention to this matter.

Sincerely,


Jenny Blackman

May 1, 2025

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

RE: New Skilled Nursing Facility in Poplar Bluff, Missouri
Paradigm Senior Living

Dear Mrs. Dorge:

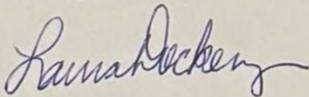
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Paradigm has a proven track record of developing and operating skilled nursing facilities. The addition of this new facility will be a fantastic, and much needed addition to the community in Poplar Bluff, Missouri.

I urge the MHFRC to recognize the need for this skilled nursing facility, and to vote in support of this project.

Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Laura Dicken", with a stylized flourish at the end.

Concerned Citizen
Poplar Bluff, Missouri

May 1, 2025

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

RE: *New Skilled Nursing Facility in Poplar Bluff, Missouri*
Paradigm Senior Living

Dear Mrs. Dorge:

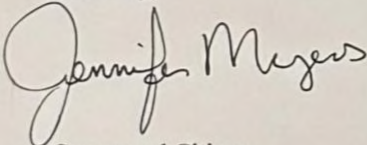
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Paradigm has a proven track record of developing and operating skilled nursing facilities. The addition of this new facility will be a fantastic, and much needed addition to the community in Poplar Bluff, Missouri.

I urge the MHFRC to recognize the need for this skilled nursing facility, and to vote in support of this project.

Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Meyer". The signature is written in dark ink and is positioned above the printed name and address.

Concerned Citizen
Poplar Bluff, Missouri

RESOLUTION NO. 2057

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF POPLAR BLUFF, MISSOURI, IN SUPPORT OF THE CERTIFICATE OF NEED APPLICATION 6205 NS TO CONSTRUCT A NEW 85-BED SKILLED NURSING FACILITY WITHIN THE CITY OF POPLAR BLUFF, MISSOURI

WHEREAS, on May 2, 2025, PB Real Estate Holdings, LLC, Black River Skilled Nursing, LLC, and their affiliated company Paradigm Senior Management (collectively referred to as “Paradigm”) submitted to the Missouri Health Facilities Review Committee (the “MHFRC”) an application for a Certificate of Need (“CON”) to construct a new, state of the art 85-bed skilled nursing facility (the “Facility”) within the City of Poplar Bluff for the Committee’s review and consideration; and

WHEREAS, Paradigm has a proven track record of developing and operating skilled nursing facilities within the State of Missouri, and the City of Poplar Bluff is in need of such a facility to serve its residents; and

WHEREAS, the Facility will provide 65 private rooms and a 20 semi-private bed memory care unit to accommodate residents with Alzheimer’s or other memory care needs; and

WHEREAS, the Facility’s construction will create an estimated 40 construction jobs during its development, and the continued operation of the Facility will create an estimated 70 permanent healthcare jobs in the City of Poplar Bluff; and,

WHEREAS, the construction of the Facility represents an Eleven Million Dollar (\$11,000,000.00) investment within the city limits of the City of Poplar Bluff; and,

WHEREAS, the City Council desires to adopt this Resolution in support of Paradigm’s application for a CON to express its support to the MHFRC for the proposed Facility.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF POPLAR BLUFF, MISSOURI, AS FOLLOWS:

Section 1. The City Council of the City of Poplar Bluff, Missouri, via this Resolution, hereby formally expresses the City's support for Paradigm's application for a CON for its proposed Facility within the City of Poplar Bluff, Missouri.

Section 2. The Mayor, and other appropriate City officials are hereby authorized to execute this Resolution, and to transmit a copy of this Resolution to the MHFRC.

Section 3. This Resolution shall take effect and be in full force upon its adoption by the City Council.

**PASSED BY THE CITY COUNCIL OF THE CITY OF POPLAR BLUFF,
MISSOURI, ON THIS 19TH DAY OF MAY, 2025.**



MAYOR

ATTEST:



CITY CLERK



Certificate of Need Program

REPRESENTATIVE REGISTRATION

(A registration form must be completed for each project presented.)	
Project Name NS: Black River Skilled Nursing	Number 6205
(Please type or print legibly.)	
Name of Representative Stephen P Miller	Title President
Firm/Corporation/Association of Representative (may be different from below, e.g., law firm, consultant, other) Oakdale Care Center	Telephone Number 573-686-5242
Address (Street/City/State/Zip Code) 2702 Debbie Ln, Poplar Bluff, MO 63901	
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 Oakdale Care Center	Telephone Number 573-686-5242
Address (Street/City/State/Zip Code) 2702 Debbie Ln, Poplar Bluff, MO 63901	
Check one. Do you: <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose <input type="checkbox"/> Neutral	Relationship to Project: <input type="checkbox"/> None <input type="checkbox"/> Employee <input type="checkbox"/> Legal Counsel <input type="checkbox"/> Consultant <input type="checkbox"/> Lobbyist <input checked="" type="checkbox"/> Other (explain): Wife of resident
Other Information: _____ _____	
<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: 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.</p>	
Original Signature Mary L. Mockman	Date July 8, 2025