



September 28, 2011

Mr. Michael McKillip, Project Analyst
Certificate of Need Section
Division of Health Service Regulation
NC Department of Health and Human Services
809 Ruggles Drive
Raleigh, NC 27626-0530

Dear Mr. McKillip:

On behalf of Laurel Health Care Company (Laurel), I wish to thank you for the opportunity to comment on several of the competing applications for the 240 nursing home beds allocated to Wake County. Laurel is a national provider of skilled nursing, rehabilitation, sub-acute and assisted living services dedicated to one simple principle - achieving the highest standards of care and caring. We currently operate The Laurels of Forest Glenn, a 120-bed nursing facility. As an existing Wake County provider, we are an interested party in the CON batch review, and thus are submitting these written comments about several of the Wake County nursing bed applications. In particular, we offer comments regarding the following CON applications:

- St. Mary's Health & Rehabilitation Center, Project ID# J-8715-11
- UniHealth Post-Acute Care-Raleigh, LLC, Project ID# J-8719-11
- Wake County Rehabilitation Center – St. Mary's, Project ID# J-8723-11
- BellaRose Nursing and Rehab Center, Project ID# J-8729-11

We believe that none of these applications should be approved.

We recognize that the decision will be based upon the State's Certificate of Need (health planning) objectives. Our comments are based on CON review criteria and health-planning goals relevant to Wake County's long-term care needs, and specific issues we believe are material to the review process.

Sincerely,

A handwritten signature in black ink, appearing to read 'Roger Obenauf'.

Roger Obenauf
Vice President of Business Development

GENERAL COMMENTS

Location

A goal of the State health planning process is a reasonable level of parity among citizens with regard to geographic access to nursing home facilities. Similarly, the CON Section has historically performed a geographic comparative analysis in competitive nursing bed reviews. Geographic location is a particularly important issue in the 2011 Wake County batch review, because of the large population of Wake County. Therefore, using the Wake County GIS, Laurel determined the Township location of each existing and approved nursing facility in Wake County.

Wake County Nursing Facilities

Facility	Township	2011 SMFP Planning Inventory
Blue Ridge Health Care Center	Meredith	114
Capital Nursing & Rehab Center	Raleigh	125
Cary Health & Rehab Center	Cary	120
City of Oaks Health & Rehab Center	St. Matthews	90
Stewart Health Care Center of Springmoor	House Creek	86
Glenaire	Cary	35
Guardian Care of Zebulon	Little River	60
Hillside Nursing Center of Wake Forest	Wake Forest	130
Litchford Falls Healthcare & Rehab Center	Neuse	90
Mayview Convalescent Center	Raleigh	69
Raleigh Rehab & Nursing Care Center	Raleigh	157
Rex Rehab & Nursing Care Center	Meredith	120
Rex Rehab & Nursing Care Center of Apex	White Oak	107
Searstone/Samaritan	Cary	8
Sunnybrook Healthcare/Rehab	Raleigh	95
The Cardinal at North Hills Healthcare	Raleigh	7
The Cypress of Raleigh	House Creek	18
The Laurels of Forest Glenn	St. Mary's	120
UniHealth Post-Acute Care - Raleigh	Swift Creek	150
Universal Health Care - North Raleigh	Neuse	112
Universal Health Care - Fuquay Varina	Middle Creek	49
WakeMed - Zebulon/Wendell	Little River	19
WakeMed - Fuquay Varina	Middle Creek	36
Wellington Healthcare & Rehab	St. Matthews	80
Windsor Point Continuing Care	Middle Creek	22
Britthaven of Holly Springs	Holly Springs	90*

*City of Oaks Health & Rehab Center received CON approval to relocate 90 nursing care beds to a new facility in Holly Springs (Britthaven of Holly Springs), CON Project ID# J-8618-10.

The following table summarizes the 2011 nursing care bed planning inventory by Township.

**Wake County Townships
Nursing Care Bed Planning Inventory**

Township	Nursing Beds Per 2011 SMFP Planning Inventory
Bartons Creek	0
Buckhorn	0
Cary	163
Cedar Fork	0
Holly Springs	90
House Creek	104
Leesville	0
Little River	79
Marks Creek	0
Meredith	234
Middle Creek	107
Neuse	202
New Light	0
Panther Branch	0
Raleigh	453
St. Marys	120
St. Matthews	170
Swift Creek	150
Wake Forest	130
White Oak	107
Available in SMFP	240
Total Planning Inventory	2,349

To determine the geographic area of greatest need in Wake County, Laurel compared the projected bed utilization (based on the methodology in the 2011 SMFP) to the distribution of nursing beds in each Township in Wake County. Please refer to the table on the following page.

2011 Wake County Nursing Bed Review
Competitive comments

Township	2014 Population	Bed Need <65		Bed Need 65-74		Bed Need 75-84		Bed Need 85+		Projected Need	Existing/ Approved Beds (Planning Inventory)	2014 Need (Surplus)
		Pop. <65	0.58	Pop. 65-74	7.7	Pop. 75-84	26.82	Pop. 85+	90.16			
Bartons Creek	21,628	19,188	11	1,684	13	618	17	138	12	53	0	53
Buckhorn	2,936	2,690	2	160	1	65	2	21	2	6	0	6
Cary	86,071	77,868	45	5,133	40	2,218	59	852	77	221	163	58
Cedar Fork	42,412	38,848	23	2,475	19	858	23	230	21	85	0	85
Holly Springs	35,425	32,671	19	1,970	15	589	16	194	18	67	90	-23
House Creek	80,055	70,983	41	5,311	41	2,527	68	1,235	111	261	104	157
Leesville	49,946	45,833	27	3,020	23	884	24	209	19	92	0	92
Little River	12,404	10,902	6	864	7	452	12	186	17	42	79	-37
Marks Creek	20,124	18,156	11	1,206	9	533	14	229	21	55	0	55
Meredith	19,746	16,735	10	1,416	11	884	24	711	64	108	234	-126
Middle Creek	45,842	41,341	24	2,629	20	1,336	36	536	48	128	130	-2
Neuse	93,743	86,250	50	4,921	38	2,005	54	566	51	193	202	-9
New Light	5,945	5,333	3	405	3	159	4	47	4	15	0	15
Panther Branch	21,016	19,098	11	1,317	10	460	12	141	13	46	0	46
Raleigh	153,927	136,213	79	9,232	71	5,656	152	2,826	255	557	453	104
St. Mary's	61,668	53,870	31	4,514	35	2,384	64	900	81	211	120	91
St. Matthews	72,814	66,103	38	4,157	32	1,916	51	637	57	179	170	9
Swift Creek	54,642	49,743	29	3,312	25	1,228	33	359	32	120	150	-30
Wake Forest	68,565	62,452	36	3,811	29	1,670	45	632	57	167	130	37
White Oak	79,026	73,718	43	3,679	28	1,233	33	396	36	140	107	33
	1,027,935	927,996		61,218		27,675		11,046		2,748	2,132	616

Source: Population data obtained by Claritas. Please note that Claritas provides projections in five-year increments. The most recent data available is 2011-2016 projections. Laurel interpolated the data to determine 2014 annual projections. Nursing bed utilization by age cohort obtained from the 2011 SMFP nursing care bed need methodology.

The previous analysis shows the greatest need for nursing care beds is in the House Creek Township (North Raleigh). Please refer to Attachment 1 for a map of the Wake County Townships. Additionally, House Creek is bordered on the north by Leesville and Bartons Creek Townships which also have large projected nursing bed deficits of 92 and 53, respectively. There are currently no nursing care beds located in either Leesville or Bartons Creek Townships. Thus, the combined nursing care bed deficit for House Creek, Leesville and Bartons Creek Township is 302 (157+92+53). It is important to note that although there are two existing facilities with nursing beds located in House Creek Township (Stewart Health Care Center of Springmoor and The Cypress of Raleigh), these facilities are Continuing Care Retirement Communities (CCRCs). Typically, nursing care beds located in CCRCs are not readily available to members of the general public. Rather, residents of the CCRC typically have priority access to the nursing care beds. Furthermore, access to these beds can be very expensive. According to the 2010 US Senate Special Committee on Aging Report, "Many CCRCs require fairly large entrance fees (some can be in the five or six-figure range) and additional monthly payments¹." Given the expenses related to gain access to a CCRC, it is unrealistic to expect that medically underserved (i.e. Medicaid and indigent) patients have equitable (or any) access to nursing care beds located at CCRCs. The 2011 SMFP nursing care bed methodology provides an exclusion of 50 percent for CCRC beds. However, given the nature of CCRCs and the limited access to their nursing care beds for the general public, the combined need for nursing care beds in House Creek, Leesville and Bartons Creek Townships is likely even much greater than 302 beds. This total is 26 percent larger than the 240 bed need determination in the 2011 SMFP.

Furthermore, beyond these three townships, Northern Wake County as a whole is geographically underserved by nursing care beds. Specifically, the combined projected nursing care bed deficit for the Townships in Northern Wake County, defined by House Creek (157), Leesville (92), Bartons Creek (53), Neuse (+9), New Light (15) and Wake Forest (37), is 345 beds. This total is 44 percent larger than the entire need determination of 240 new beds, and is much greater than the projected bed deficit for the remaining Townships in Wake County, 616 total Wake County bed deficit – 345 Northern Wake County bed deficit = 271 beds. **Therefore, clearly the most effective alternative for improving access to nursing care beds for Wake County residents, including the medically underserved, is to develop all 240 new nursing beds in Northern Wake County.**

UniHealth Post-Acute Care-Raleigh, LLC (UniHealth) proposes to add 20 nursing care beds to its existing facility in Swift Creek Township; however, Swift Creek Township already has a projected surplus of 30 nursing care beds in 2014. Therefore, UniHealth's proposal is not an effective alternative with regard to increasing geographic access to nursing care beds in Wake County and should be denied.

Three applicants propose to develop new nursing care beds in St. Mary's township:

¹ Continuing Care Retirement Communities: Risks to Seniors, Summary of Committee Investigation, July 21, 2010.

- St. Mary's Health & Rehabilitation Center (Britthaven), 100 beds
- Wake County Rehabilitation Center – St. Mary's (Liberty), 120 beds
- BellaRose Nursing and Rehab Center (BellaRose), 100 beds

However, St. Mary's township is not the most effective alternative with regard to increasing geographic access to nursing care beds in Wake County. Specifically, there are three townships in Wake County with projected nursing bed deficits greater than St. Mary's township (House Creek, 157; Raleigh, 104; Leesville, 92). Additionally, as noted in the previous table, St. Mary's township has a projected nursing bed deficit of 91 beds in 2014. All three St. Mary's proposals include nursing bed facilities that are in excess of the projected 91-bed deficit, and thus would result in St. Mary's township having a nursing bed surplus.

The proposed Liberty facility location is approximately three miles from Laurel's existing Garner facility, and the proposed Britthaven and BellaRose facility locations are approximately four miles from Laurel's existing Garner facility. Thus, the Liberty, BellaRose and Britthaven proposals in St. Mary's township will unnecessarily duplicate existing services for Garner area residents.

Residents of St. Mary's township currently have access to nursing care beds via Laurel's existing 120-bed skilled nursing facility in Garner, The Laurels of Forest Glenn. Laurel has a long history of providing health care services in Wake County and thus, has well-established relationships with local physicians, hospitals and discharge planners. The Laurels of Forest Glenn currently serves residents of St. Mary's township and will continue to meet the nursing care needs of local residents. A new nursing facility in St. Mary's township will result in a surplus of nursing care beds, and will ignore the greater geographic need for nursing care beds in House Creek, Raleigh and Leesville townships. Clearly, the St. Mary's proposals by Britthaven, Liberty and BellaRose are not the most effective alternative with respect to improving geographic access.

Access

Two applications depend on lower Medicaid/Medicare access to be financially viable. Shown below are the Medicaid and Medicare payor mix comparisons of the 16 applicants. It is evident that BellaRose and St. Mary's Health and Rehab are proposing relatively less access to beds for Medicaid and Medicare patients, which will directly benefit the most needy patients. These applicants are less effective alternatives in this comparison.

Combined Medicare & Medicaid

Applicants	Combined Percent
UniHealth Post-Acute Care-Cary	94.6%
Wake County Health & Rehab Center	94.0%
Wake County Rehabilitation Center - St. Mary's	92.0%
UniHealth Post-Acute Care-Raleigh	89.0%
The Heritage of Raleigh	86.1%
Hillcrest Convalescent Center	85.4%
UniHealth Post-Acute Care-North Raleigh	85.0%
The Rehabilitation and Nursing Center at Cary	85.0%
The Rehabilitation and Nursing Center at Raleigh	85.0%
Wake County Rehabilitation Center - House Creek	83.8%
Wake County Rehabilitation Center - Cedar Fork	78.7%
St. Mary's Health & Rehab Center	78.0%
Universal Health Care/North Raleigh	76.4%
Wake County Health & Rehab	75.9%
Universal Health Care/Fuquay Varina	75.4%
BellaRose Nursing and Rehab Center	74.5%

Cost

No health-planning decision is complete without considering the impact of facility design. A successful applicant must present a program that focuses on innovative design to positively impact patient care and quality of life.

With regard to construction costs, two applicants (St. Mary's Health & Rehab Center and BellaRose Nursing and Rehab Center) propose construction costs lower than those of the other applicants who are proposing to develop new facilities. Please refer to the table on the following page.

Project Capital Cost

Applicants	\$\$
The Heritage of Raleigh	\$ 20,961,007
Hillcrest Convalescent Center	\$ 17,916,708
Wake County Rehabilitation Center - House Creek	\$ 15,667,836
Wake County Rehabilitation Center - St. Mary's	\$ 14,719,180
Wake County Rehabilitation Center - Cedar Fork	\$ 13,850,714
Wake County Health & Rehab	\$ 13,650,000
Wake County Health & Rehab Center	\$ 11,360,686
The Rehabilitation and Nursing Center at Raleigh	\$ 11,335,022
The Rehabilitation and Nursing Center at Cary	\$ 10,933,149
UniHealth Post-Acute Care-North Raleigh	\$ 10,604,159
UniHealth Post-Acute Care-Cary	\$ 9,713,726
St. Mary's Health & Rehab Center	\$ 9,586,489
BellaRose Nursing and Rehab Center	\$ 8,534,150
Universal Health Care/Fuquay Varina*	\$ 3,541,100
UniHealth Post-Acute Care-Raleigh*	\$ 2,173,393
Universal Health Care/North Raleigh*	\$ 1,490,200

*Propose expansion of existing nursing facility; not a new facility.

This raises a question as to whether these two projects represent the most effective alternative with regard to innovations in nursing facility design. Policy NH-8, which is applicable to this batch review, requires applicants to pursue innovative approaches in environmental design to address quality of care and quality of life needs of the residents. Specifically, the Policy is seeking design plans that include “innovative design elements that encourage less institutional, more home-like settings, privacy, autonomy and resident choice, among others.” Given the substantial impact that facility design has on care practice, workplace practice, and resident quality of life, the low construction cost of these two applications indicates they are the least effective alternative with regard to innovative design.

The remainder of this document consists of specific comments regarding four of the competing applications.

SPECIFIC COMMENTS

BellaRose Nursing and Rehab Center

- ◆ BellaRose projected Medicaid reimbursement at a rate of \$158.64. This is higher than the rate of \$145.40 specified by the CON Section for new nursing facilities pursuant to a need determination in the 2011 SMFP, as specified in the cover page of the CON monthly report. Therefore, the BellaRose application is non-conforming with Review Criterion 5.

- ◆ BellaRose projects the second fewest Medicaid patient days of any applicant, and thus is not an effective alternative from an underserved access perspective. Additionally, their projected Medicaid payor mix of 49.1% is less than the current Wake County average of 49.5%, as shown in the 2011 License Renewal Applications of the existing nursing facilities. Thus, BellaRose is non-conforming to Criterion 13.

Projected Medicaid Payor Mix

Applicants	Medicaid Percent
Wake County Health & Rehab Center	76.0%
Wake County Rehabilitation Center - St. Mary's	74.0%
UniHealth Post-Acute Care-Raleigh	72.0%
UniHealth Post-Acute Care-North Raleigh	69.0%
The Rehabilitation and Nursing Center at Cary	69.0%
The Rehabilitation and Nursing Center at Raleigh	69.0%
UniHealth Post-Acute Care-Cary	67.9%
Wake County Rehabilitation Center - House Creek	66.7%
Hillcrest Convalescent Center	64.6%
The Heritage of Raleigh	64.3%
Universal Health Care/Fuquay Varina	55.4%
St. Mary's Health & Rehab Center	55.1%
Universal Health Care/North Raleigh	50.9%
Wake County Health & Rehab	50.6%
BellaRose Nursing and Rehab Center	49.1%
Wake County Rehabilitation Center - Cedar Fork	46.3%

- ◆ BellaRose projects the lowest combined Medicare/Medicaid patient mix of any applicant, and thus is the least effective alternative from an underserved access perspective.

Projected Combined Medicare/Medicaid Payor Mix

Applicants	Combined Percent
UniHealth Post-Acute Care-Cary	94.6%
Wake County Health & Rehab Center	94.0%
Wake County Rehabilitation Center - St. Mary's	92.0%
UniHealth Post-Acute Care-Raleigh	89.0%
The Heritage of Raleigh	86.1%
Hillcrest Convalescent Center	85.4%
UniHealth Post-Acute Care-North Raleigh	85.0%
The Rehabilitation and Nursing Center at Cary	85.0%
The Rehabilitation and Nursing Center at Raleigh	85.0%
Wake County Rehabilitation Center - House Creek	83.8%
Wake County Rehabilitation Center - Cedar Fork	78.7%
St. Mary's Health & Rehab Center	78.0%
Universal Health Care/North Raleigh	76.4%
Wake County Health & Rehab	75.9%
Universal Health Care/Fuquay Varina	75.4%
BellaRose Nursing and Rehab Center	74.5%

- ◆ BellaRose proposes various staff salaries that are the lowest of all the other applicants. Specifically, BellaRose proposes the lowest salaries for the DON, ADON, RN, LPN and Nurse Aides (see tables on the following pages).

Projected DON Salary

2015 Salary	
Applicants	DON
St. Mary's Health & Rehab Center	\$ 99,009
Wake County Rehabilitation Center - Cedar Fork	\$ 94,483
Hillcrest Convalescent Center	\$ 90,311
The Heritage of Raleigh	\$ 90,311
Universal Health Care/Fuquay Varina	\$ 89,757
Wake County Rehabilitation Center - House Creek	\$ 89,627
Wake County Health & Rehab	\$ 89,502
Universal Health Care/North Raleigh	\$ 89,502
UniHealth Post-Acute Care-North Raleigh	\$ 85,234
The Rehabilitation and Nursing Center at Cary	\$ 85,234
The Rehabilitation and Nursing Center at Raleigh	\$ 85,234
UniHealth Post-Acute Care-Raleigh	\$ 85,000
Wake County Rehabilitation Center - St. Mary's	\$ 83,000
Wake County Health & Rehab Center	\$ 83,000
UniHealth Post-Acute Care-Cary	\$ 81,120
BellaRose Nursing and Rehab Center	\$ 74,991

Projected ADON Salary

2015 Salary	
Applicants	ADON
Wake County Rehabilitation Center - Cedar Fork	\$ 76,960
UniHealth Post-Acute Care-North Raleigh	\$ 70,000
UniHealth Post-Acute Care-Raleigh	\$ 70,000
Hillcrest Convalescent Center	\$ 70,000
The Heritage of Raleigh	\$ 70,000
The Rehabilitation and Nursing Center at Cary	\$ 70,000
The Rehabilitation and Nursing Center at Raleigh	\$ 70,000
St. Mary's Health & Rehab Center	\$ 69,618
Wake County Rehabilitation Center - House Creek	\$ 67,018
Wake County Rehabilitation Center - St. Mary's	\$ 63,000
Wake County Health & Rehab Center	\$ 63,000
BellaRose Nursing and Rehab Center	\$ 48,565
UniHealth Post-Acute Care-Cary	\$ -
Universal Health Care/Fuquay Varina	\$ -
Wake County Health & Rehab	\$ -
Universal Health Care/North Raleigh	\$ -

Projected RN Salary

2015 Salary	
Applicants	RN
Wake County Rehabilitation Center - Cedar Fork	\$ 66,253
St. Mary's Health & Rehab Center	\$ 64,230
Wake County Rehabilitation Center - House Creek	\$ 62,691
Wake County Health & Rehab	\$ 61,194
Universal Health Care/North Raleigh	\$ 61,194
The Heritage of Raleigh	\$ 60,454
Hillcrest Convalescent Center	\$ 60,342
Wake County Rehabilitation Center - St. Mary's	\$ 58,240
Wake County Health & Rehab Center	\$ 58,240
UniHealth Post-Acute Care-North Raleigh	\$ 57,000
UniHealth Post-Acute Care-Raleigh	\$ 57,000
The Rehabilitation and Nursing Center at Cary	\$ 57,000
The Rehabilitation and Nursing Center at Raleigh	\$ 57,000
UniHealth Post-Acute Care-Cary	\$ 56,160
Universal Health Care/Fuquay Varina	\$ 54,237
BellaRose Nursing and Rehab Center	\$ 50,462

Projected LPN Salary

2015 Salary	
Applicants	LPN
Wake County Health & Rehab	\$ 54,309
Universal Health Care/North Raleigh	\$ 54,309
St. Mary's Health & Rehab Center	\$ 53,498
Wake County Rehabilitation Center - Cedar Fork	\$ 50,453
UniHealth Post-Acute Care-Cary	\$ 49,920
Wake County Rehabilitation Center - House Creek	\$ 48,256
Hillcrest Convalescent Center	\$ 48,138
The Heritage of Raleigh	\$ 48,138
Wake County Rehabilitation Center - St. Mary's	\$ 47,320
Wake County Health & Rehab Center	\$ 47,320
UniHealth Post-Acute Care-North Raleigh	\$ 47,000
UniHealth Post-Acute Care-Raleigh	\$ 47,000
The Rehabilitation and Nursing Center at Cary	\$ 47,000
The Rehabilitation and Nursing Center at Raleigh	\$ 47,000
Universal Health Care/Fuquay Varina	\$ 45,488
BellaRose Nursing and Rehab Center	\$ 39,808

Projected Nurse Aide Salary

2015 Salary	
Applicants	Nurse Aide
St. Mary's Health & Rehab Center	\$ 30,654
UniHealth Post-Acute Care-North Raleigh	\$ 27,000
The Rehabilitation and Nursing Center at Cary	\$ 27,000
The Rehabilitation and Nursing Center at Raleigh	\$ 27,000
Wake County Health & Rehab	\$ 26,874
Universal Health Care/North Raleigh	\$ 26,874
UniHealth Post-Acute Care-Cary	\$ 25,350
Wake County Rehabilitation Center - House Creek	\$ 25,175
UniHealth Post-Acute Care-Raleigh	\$ 25,000
Wake County Rehabilitation Center - Cedar Fork	\$ 24,716
Universal Health Care/Fuquay Varina	\$ 24,619
Hillcrest Convalescent Center	\$ 23,054
The Heritage of Raleigh	\$ 23,054
Wake County Rehabilitation Center - St. Mary's	\$ 22,425
Wake County Health & Rehab Center	\$ 22,425
BellaRose Nursing and Rehab Center	\$ 22,196

- ◆ BellaRose proposes one of the lower private bedroom mixes of all the applicants (see table below).

Projected Private Rooms

Applicants	# of private rooms	%
Hillcrest Convalescent Center	104	87%
The Heritage of Raleigh	78	87%
UniHealth Post-Acute Care-North Raleigh	72	60%
Universal Health Care/Fuquay Varina	67	61%
Wake County Rehabilitation Center - St. Mary's	66	51%
Wake County Rehabilitation Center - Cedar Fork	66	51%
Wake County Rehabilitation Center - House Creek	66	51%
UniHealth Post-Acute Care-Cary	60	60%
BellaRose Nursing and Rehab Center	46	46%
St. Mary's Health & Rehab Center	44	44%
Wake County Health & Rehab Center	40	33%
Wake County Health & Rehab	40	33%
The Rehabilitation and Nursing Center at Cary	40	33%
The Rehabilitation and Nursing Center at Raleigh	40	33%
Universal Health Care/North Raleigh	36	27%
UniHealth Post-Acute Care-Raleigh	30	18%

- ◆ BellaRose’s proposed location is relatively close to the existing The Laurels of Forest Glenn in Garner, and is thus an ineffective alternative from a geographic perspective.
- ◆ BellaRose projects the fifth highest private pay patient charge of any applicant (see table on the following page).

Projected Private Pay Patient Charge

Applicants	Private
The Rehabilitation and Nursing Center at Cary	\$ 311.00
UniHealth Post-Acute Care-North Raleigh	\$ 253.61
St. Mary's Health & Rehab Center	\$ 250.00
Universal Health Care/North Raleigh	\$ 244.33
BellaRose Nursing and Rehab Center	\$ 240.00
Universal Health Care/Fuquay Varina	\$ 240.00
Wake County Rehabilitation Center - House Creek	\$ 198.00
Hillcrest Convalescent Center	\$ 198.00
Wake County Health & Rehab	\$ 196.00
UniHealth Post-Acute Care-Raleigh	\$ 190.00
The Rehabilitation and Nursing Center at Raleigh	\$ 190.00
The Heritage of Raleigh	\$ 190.00
UniHealth Post-Acute Care-Cary	\$ 190.00
Wake County Rehabilitation Center - St. Mary's	\$ 188.00
Wake County Health & Rehab Center	\$ 188.00
Wake County Rehabilitation Center - Cedar Fork	\$ 180.00

- ◆ BellaRose proposes one of the smallest facilities. This is not an effective alternative from either operational or patient comfort perspectives. Further, this smaller facility is not consistent with Health Policy NH-8: Innovations in Nursing Facility Design. This policy is focused on improving the quality of life for nursing facility residents by providing a less institutional, more home-like setting, privacy, and autonomy.

UniHealth Post-Acute Care-Raleigh, LLC

- ◆ UniHealth proposes to expand its existing nursing facility in Raleigh. Thus, UniHealth Center is not a new provider in the marketplace, and does not offer the advantage of additional competition and consumer choice in the local marketplace. Plus, as previously stated, UniHealth proposes to add 20 nursing care beds to its existing facility in Swift Creek Township and Swift Creek Township already has a projected surplus of 30 nursing care beds in 2014. Therefore, UniHealth’s proposal is not an effective alternative with regard to increasing geographic access to nursing care beds in Wake County.
- ◆ UniHealth proposes only 20 additional beds. The 2011 SMFP indicates a need for an additional 240 new nursing facility beds in Wake County. Thus, the UniHealth application is the least effective alternative of all the applicants in terms of expanding bed capacity in Wake County, as it would only add 20 new beds.
- ◆ UniHealth proposes the lowest private bedroom mix of all the applicants (see table below).

Projected Private Rooms

Applicants	#	%
Hillcrest Convalescent Center	104	87%
The Heritage of Raleigh	78	87%
UniHealth Post-Acute Care-North Raleigh	72	60%
Universal Health Care/Fuquay Varina	67	61%
Wake County Rehabilitation Center - St. Mary's	66	51%
Wake County Rehabilitation Center - Cedar Fork	66	51%
Wake County Rehabilitation Center - House Creek	66	51%
UniHealth Post-Acute Care-Cary	60	60%
BellaRose Nursing and Rehab Center	46	46%
St. Mary's Health & Rehab Center	44	44%
Wake County Health & Rehab Center	40	33%
Wake County Health & Rehab	40	33%
The Rehabilitation and Nursing Center at Cary	40	33%
The Rehabilitation and Nursing Center at Raleigh	40	33%
Universal Health Care/North Raleigh	36	27%
UniHealth Post-Acute Care-Raleigh	30	18%

- ◆ UniHealth’s projected Medicare patient mix is the fourth lowest of any applicant, as shown below. UniHealth is thus an ineffective alternative from an access perspective.

Projected Medicare Payor Mix

Applicants	Medicare Percent
Wake County Rehabilitation Center - Cedar Fork	32.3%
UniHealth Post-Acute Care-Cary	26.8%
BellaRose Nursing and Rehab Center	25.5%
Universal Health Care/North Raleigh	25.5%
Wake County Health & Rehab	25.2%
St. Mary's Health & Rehab Center	22.8%
The Heritage of Raleigh	21.7%
Hillcrest Convalescent Center	20.8%
Universal Health Care/Fuquay Varina	20.0%
Wake County Rehabilitation Center - St. Mary's	18.0%
Wake County Health & Rehab Center	18.0%
Wake County Rehabilitation Center - House Creek	17.1%
UniHealth Post-Acute Care-Raleigh	17.0%
UniHealth Post-Acute Care-North Raleigh	16.0%
The Rehabilitation and Nursing Center at Cary	16.0%
The Rehabilitation and Nursing Center at Raleigh	16.0%

- ◆ UniHealth projects the second highest costs per patient day of all the applicants, as shown on the tables below.

Projected Direct Cost/Patient Day

Projected Reimbursed Expense/Patient Day

Applicants	\$\$
The Heritage of Raleigh	\$192.60
UniHealth Post-Acute Care-Raleigh	\$192.26
UniHealth Post-Acute Care-North Raleigh	\$162.97
UniHealth Post-Acute Care-Cary	\$157.87
The Rehabilitation and Nursing Center at Cary	\$154.58
The Rehabilitation and Nursing Center at Raleigh	\$152.87
Universal Health Care/North Raleigh	\$144.41
Wake County Rehabilitation Center - St. Mary's	\$143.54
Wake County Rehabilitation Center - Cedar Fork	\$143.54
Wake County Rehabilitation Center - House Creek	\$143.54
St. Mary's Health & Rehab Center	\$142.87
Wake County Health & Rehab Center	\$140.88
BellaRose Nursing and Rehab Center	\$139.09
Hillcrest Convalescent Center	\$134.24
Wake County Health & Rehab	\$128.01
Universal Health Care/Fuquay Varina	\$125.06

Applicants	\$\$
The Heritage of Raleigh	\$297.48
UniHealth Post-Acute Care-Raleigh	\$273.60
UniHealth Post-Acute Care-North Raleigh	\$237.84
The Rehabilitation and Nursing Center at Cary	\$236.62
UniHealth Post-Acute Care-Cary	\$234.64
The Rehabilitation and Nursing Center at Raleigh	\$234.21
Hillcrest Convalescent Center	\$231.61
Wake County Health & Rehab	\$214.93
St. Mary's Health & Rehab Center	\$205.89
Wake County Rehabilitation Center - St. Mary's	\$203.19
Wake County Rehabilitation Center - House Creek	\$203.11
Wake County Rehabilitation Center - Cedar Fork	\$202.80
Wake County Health & Rehab Center	\$202.76
Universal Health Care/North Raleigh	\$200.84
BellaRose Nursing and Rehab Center	\$197.74
Universal Health Care/Fuquay Varina	\$179.30

- ◆ UniHealth proposes various staff salaries that are lower than those proposed by most of the other applicants. Specifically, UniHealth proposes salaries for the direct care givers (RNs, LPNs, and Nurse Aides) that are among the lowest (see tables on the following pages). Further, UniHealth proposes the second lowest benefit percentage of the 16 applications (see tables on the following page).

Projected RN Salary

2015 Salary	
Applicants	RN
Wake County Rehabilitation Center - Cedar Fork	\$66,253
St. Mary's Health & Rehab Center	\$64,230
Wake County Rehabilitation Center - House Creek	\$62,691
Wake County Health & Rehab	\$61,194
Universal Health Care/North Raleigh	\$61,194
The Heritage of Raleigh	\$60,454
Hillcrest Convalescent Center	\$60,342
Wake County Rehabilitation Center - St. Mary's	\$58,240
Wake County Health & Rehab Center	\$58,240
UniHealth Post-Acute Care-North Raleigh	\$57,000
UniHealth Post-Acute Care-Raleigh	\$57,000
The Rehabilitation and Nursing Center at Cary	\$57,000
The Rehabilitation and Nursing Center at Raleigh	\$57,000
UniHealth Post-Acute Care-Cary	\$56,160
Universal Health Care/Fuquay Varina	\$54,237
BellaRose Nursing and Rehab Center	\$50,462

Projected LPN Salary

2015 Salary	
Applicants	LPN
Wake County Health & Rehab	\$54,309
Universal Health Care/North Raleigh	\$54,309
St. Mary's Health & Rehab Center	\$53,498
Wake County Rehabilitation Center - Cedar Fork	\$50,453
UniHealth Post-Acute Care-Cary	\$49,920
Wake County Rehabilitation Center - House Creek	\$48,256
Hillcrest Convalescent Center	\$48,138
The Heritage of Raleigh	\$48,138
Wake County Rehabilitation Center - St. Mary's	\$47,320
Wake County Health & Rehab Center	\$47,320
UniHealth Post-Acute Care-North Raleigh	\$47,000
UniHealth Post-Acute Care-Raleigh	\$47,000
The Rehabilitation and Nursing Center at Cary	\$47,000
The Rehabilitation and Nursing Center at Raleigh	\$47,000
Universal Health Care/Fuquay Varina	\$45,488
BellaRose Nursing and Rehab Center	\$39,808

2015 Nurse Aide Salary

Projected Staff Benefits

Applicants	Nurse Aide
St. Mary's Health & Rehab Center	\$30,654
UniHealth Post-Acute Care-North Raleigh	\$27,000
The Rehabilitation and Nursing Center at Cary	\$27,000
The Rehabilitation and Nursing Center at Raleigh	\$27,000
Wake County Health & Rehab	\$26,874
Universal Health Care/North Raleigh	\$26,874
UniHealth Post-Acute Care-Cary	\$25,350
Wake County Rehabilitation Center - House Creek	\$25,175
UniHealth Post-Acute Care-Raleigh	\$25,000
Wake County Rehabilitation Center - Cedar Fork	\$24,716
Universal Health Care/Fuquay Varina	\$24,619
Hillcrest Convalescent Center	\$23,054
The Heritage of Raleigh	\$23,054
Wake County Rehabilitation Center - St. Mary's	\$22,425
Wake County Health & Rehab Center	\$22,425
BellaRose Nursing and Rehab Center	\$22,196

Applicants	Payroll %
The Heritage of Raleigh	30.9%
Hillcrest Convalescent Center	29.1%
Wake County Rehabilitation Center - Cedar Fork	26.7%
UniHealth Post-Acute Care-Cary	26.6%
Wake County Rehabilitation Center - House Creek	23.6%
St. Mary's Health & Rehab Center	23.6%
UniHealth Post-Acute Care-North Raleigh	23.5%
The Rehabilitation and Nursing Center at Cary	23.5%
The Rehabilitation and Nursing Center at Raleigh	23.5%
Wake County Rehabilitation Center - St. Mary's	22.0%
Wake County Health & Rehab Center	22.0%
Universal Health Care/Fuquay Varina	21.7%
Wake County Health & Rehab	19.7%
Universal Health Care/North Raleigh	19.7%
UniHealth Post-Acute Care-Raleigh	18.0%
BellaRose Nursing and Rehab Center	12.8%

St. Mary's Health & Rehabilitation Center (Britthaven)

- ◆ Britthaven projected Medicaid reimbursement at a rate of \$159.39. This is higher than the rate of \$145.40 specified by the CON Section for new nursing facilities pursuant to a need determination in the 2011 SMFP, as specified in the cover page of the CON monthly report. Therefore, the Britthaven application is non-conforming with Review Criterion 5.
- ◆ Britthaven's proposed location is relatively close to the existing The Laurels of Forest Glenn in Garner, and is thus an ineffective alternative from a geographic perspective.
- ◆ Britthaven's projected Medicaid patient mix is the fifth lowest of all the applicants (as shown below), and thus is a less effective alternative.

Projected Medicaid Access

Applicants	Medicaid Percent
Wake County Health & Rehab Center	76.0%
Wake County Rehabilitation Center - St. Mary's	74.0%
UniHealth Post-Acute Care-Raleigh	72.0%
UniHealth Post-Acute Care-North Raleigh	69.0%
The Rehabilitation and Nursing Center at Cary	69.0%
The Rehabilitation and Nursing Center at Raleigh	69.0%
UniHealth Post-Acute Care-Cary	67.9%
Wake County Rehabilitation Center - House Creek	66.7%
Hillcrest Convalescent Center	64.6%
The Heritage of Raleigh	64.3%
Universal Health Care/Fuquay Varina	55.4%
St. Mary's Health & Rehab Center	55.1%
Universal Health Care/North Raleigh	50.9%
Wake County Health & Rehab	50.6%
BellaRose Nursing and Rehab Center	49.1%
Wake County Rehabilitation Center - Cedar Fork	46.3%

- ◆ Britthaven's projected combined Medicare/Medicaid patient mix is the fifth lowest of all the applicants (as shown below), and thus is a less effective alternative.

Projected Combined Medicare & Medicaid Access

Applicants	Combined Percent
UniHealth Post-Acute Care-Cary	94.6%
Wake County Health & Rehab Center	94.0%
Wake County Rehabilitation Center - St. Mary's	92.0%
UniHealth Post-Acute Care-Raleigh	89.0%
The Heritage of Raleigh	86.1%
Hillcrest Convalescent Center	85.4%
UniHealth Post-Acute Care-North Raleigh	85.0%
The Rehabilitation and Nursing Center at Cary	85.0%
The Rehabilitation and Nursing Center at Raleigh	85.0%
Wake County Rehabilitation Center - House Creek	83.8%
Wake County Rehabilitation Center - Cedar Fork	78.7%
St. Mary's Health & Rehab Center	78.0%
Universal Health Care/North Raleigh	76.4%
Wake County Health & Rehab	75.9%
Universal Health Care/Fuquay Varina	75.4%
BellaRose Nursing and Rehab Center	74.5%

- ◆ Britthaven proposes one of the lower total staffing complements of all the applicants, as shown on the table on the following page.

Projected Total Staffing/Bed

Applicants	Total FTE's/Bed
Wake County Rehabilitation Center - St. Mary's	1.26
Wake County Rehabilitation Center - Cedar Fork	1.26
Wake County Rehabilitation Center - House Creek	1.26
The Heritage of Raleigh	1.17
BellaRose Nursing and Rehab Center	1.14
Hillcrest Convalescent Center	1.12
UniHealth Post-Acute Care-Raleigh	1.11
The Rehabilitation and Nursing Center at Cary	1.06
The Rehabilitation and Nursing Center at Raleigh	1.06
St. Mary's Health & Rehab Center	1.03
Wake County Health & Rehab Center	1.02
UniHealth Post-Acute Care-Cary	1.01
Wake County Health & Rehab	0.99
Universal Health Care/North Raleigh	0.97
Universal Health Care/Fuquay Varina	0.95
UniHealth Post-Acute Care-North Raleigh	0.93

- ◆ Britthaven projects the third highest private pay patient charge of any applicant (see table below).

Projected Private Pay Patient Charge

Applicants	Private
The Rehabilitation and Nursing Center at Cary	\$ 311.00
UniHealth Post-Acute Care-North Raleigh	\$ 253.61
St. Mary's Health & Rehab Center	\$ 250.00
Universal Health Care/North Raleigh	\$ 244.33
BellaRose Nursing and Rehab Center	\$ 240.00
Universal Health Care/Fuquay Varina	\$ 240.00
Wake County Rehabilitation Center - House Creek	\$ 198.00
Hillcrest Convalescent Center	\$ 198.00
Wake County Health & Rehab	\$ 196.00
UniHealth Post-Acute Care-Raleigh	\$ 190.00

The Rehabilitation and Nursing Center at Raleigh	\$ 190.00
The Heritage of Raleigh	\$ 190.00
UniHealth Post-Acute Care-Cary	\$ 190.00
Wake County Rehabilitation Center - St. Mary's	\$ 188.00
Wake County Health & Rehab Center	\$ 188.00
Wake County Rehabilitation Center - Cedar Fork	\$ 180.00

- ◆ Britthaven proposes one of the lowest private bedroom mixes of all the applicants (see table below).

Projected Private Rooms

Applicants	#	%
Hillcrest Convalescent Center	104	87%
The Heritage of Raleigh	78	87%
UniHealth Post-Acute Care-North Raleigh	72	60%
Universal Health Care/Fuquay Varina	67	61%
Wake County Rehabilitation Center - St. Mary's	66	51%
Wake County Rehabilitation Center - Cedar Fork	66	51%
Wake County Rehabilitation Center - House Creek	66	51%
UniHealth Post-Acute Care-Cary	60	60%
BellaRose Nursing and Rehab Center	46	46%
St. Mary's Health & Rehab Center	44	44%
Wake County Health & Rehab Center	40	33%
Wake County Health & Rehab	40	33%
The Rehabilitation and Nursing Center at Cary	40	33%
The Rehabilitation and Nursing Center at Raleigh	40	33%
Universal Health Care/North Raleigh	36	27%
UniHealth Post-Acute Care-Raleigh	30	18%

Wake County Rehabilitation Center – St. Mary’s (Liberty)

- ◆ Liberty projected Medicaid reimbursement at a rate of \$159.39. This is higher than the rate of \$145.40 specified by the CON Section for new nursing facilities pursuant to a need determination in the 2011 SMFP, as specified in the cover page of the CON monthly report. Therefore, the Liberty application is non-conforming with Review Criterion 5.
- ◆ Liberty’s proposed location is relatively close to the existing The Laurels of Forest Glenn in Garner, and is thus an ineffective alternative from a geographic perspective.
- ◆ Liberty proposes various staff salaries that are lower than those proposed by most of the other applicants. Specifically, Liberty proposes salaries for the DON, ADON, SDC, LPN and Nurse Aides that are among the lowest (see tables below and on the following pages).

2015 DON Salary

Applicants	DON
St. Mary's Health & Rehab Center	\$99,009
Wake County Rehabilitation Center - Cedar Fork	\$94,483
Hillcrest Convalescent Center	\$90,311
The Heritage of Raleigh	\$90,311
Universal Health Care/Fuquay Varina	\$89,757
Wake County Rehabilitation Center - House Creek	\$89,627
Wake County Health & Rehab	\$89,502
Universal Health Care/North Raleigh	\$89,502
UniHealth Post-Acute Care-North Raleigh	\$85,234
The Rehabilitation and Nursing Center at Cary	\$85,234
The Rehabilitation and Nursing Center at Raleigh	\$85,234
UniHealth Post-Acute Care-Raleigh	\$85,000
Wake County Rehabilitation Center - St. Mary's	\$83,000
Wake County Health & Rehab Center	\$83,000
UniHealth Post-Acute Care-Cary	\$81,120
BellaRose Nursing and Rehab Center	\$74,991

2015 ADON Salary

Applicants	ADON
Wake County Rehabilitation Center - Cedar Fork	\$76,960
UniHealth Post-Acute Care-North Raleigh	\$70,000
UniHealth Post-Acute Care-Raleigh	\$70,000
Hillcrest Convalescent Center	\$70,000
The Heritage of Raleigh	\$70,000
The Rehabilitation and Nursing Center at Cary	\$70,000
The Rehabilitation and Nursing Center at Raleigh	\$70,000
St. Mary's Health & Rehab Center	\$69,618
Wake County Rehabilitation Center - House Creek	\$67,018
Wake County Rehabilitation Center - St. Mary's	\$63,000
Wake County Health & Rehab Center	\$63,000
BellaRose Nursing and Rehab Center	\$48,565
UniHealth Post-Acute Care-Cary	\$ -
Universal Health Care/Fuquay Varina	\$ -
Wake County Health & Rehab	\$ -
Universal Health Care/North Raleigh	\$ -

2011 Wake County Nursing Bed Review
Competitive comments

Projected SDC Salary

2015 Salary	
Applicants	SDC
St. Mary's Health & Rehab Center	\$69,618
Wake County Rehabilitation Center - House Creek	\$68,224
UniHealth Post-Acute Care-Cary	\$60,320
UniHealth Post-Acute Care-Raleigh	\$60,000
UniHealth Post-Acute Care-North Raleigh	\$59,162
The Rehabilitation and Nursing Center at Cary	\$59,162
The Rehabilitation and Nursing Center at Raleigh	\$59,162
BellaRose Nursing and Rehab Center	\$55,583
Wake County Rehabilitation Center - St. Mary's	\$52,000
Wake County Health & Rehab Center	\$52,000
Wake County Health & Rehab	\$34,632
Universal Health Care/North Raleigh	\$34,632
Wake County Rehabilitation Center - Cedar Fork	\$ -
Hillcrest Convalescent Center	\$ -
The Heritage of Raleigh	\$ -
Universal Health Care/Fuquay Varina	\$ -

Projected LPN Salary

2015 Salary	
Applicants	LPN
Wake County Health & Rehab	\$54,309
Universal Health Care/North Raleigh	\$54,309
St. Mary's Health & Rehab Center	\$53,498
Wake County Rehabilitation Center - Cedar Fork	\$50,453
UniHealth Post-Acute Care-Cary	\$49,920
Wake County Rehabilitation Center - House Creek	\$48,256
Hillcrest Convalescent Center	\$48,138
The Heritage of Raleigh	\$48,138
Wake County Rehabilitation Center - St. Mary's	\$47,320
Wake County Health & Rehab Center	\$47,320
UniHealth Post-Acute Care-North Raleigh	\$47,000
UniHealth Post-Acute Care-Raleigh	\$47,000
The Rehabilitation and Nursing Center at Cary	\$47,000
The Rehabilitation and Nursing Center at Raleigh	\$47,000
Universal Health Care/Fuquay Varina	\$45,488
BellaRose Nursing and Rehab Center	\$39,808

Projected Nurse Aide Salary

2015 Salary	
Applicants	Nurse Aide
St. Mary's Health & Rehab Center	\$ 30,654
UniHealth Post-Acute Care-North Raleigh	\$ 27,000
The Rehabilitation and Nursing Center at Cary	\$ 27,000
The Rehabilitation and Nursing Center at Raleigh	\$ 27,000
Wake County Health & Rehab	\$ 26,874
Universal Health Care/North Raleigh	\$ 26,874
UniHealth Post-Acute Care-Cary	\$ 25,350
Wake County Rehabilitation Center - House Creek	\$ 25,175
UniHealth Post-Acute Care-Raleigh	\$ 25,000
Wake County Rehabilitation Center - Cedar Fork	\$ 24,716
Universal Health Care/Fuquay Varina	\$ 24,619
Hillcrest Convalescent Center	\$ 23,054
The Heritage of Raleigh	\$ 23,054
Wake County Rehabilitation Center - St. Mary's	\$ 22,425
Wake County Health & Rehab Center	\$ 22,425
BellaRose Nursing and Rehab Center	\$ 22,196

- ◆ Liberty projects one of the highest Medicare reimbursement rates of any applicant, and thus is not an effective alternative from a cost perspective.

Projected Medicare Reimbursement Rate

Applicants	Rate
Wake County Rehabilitation Center - House Creek	\$ 462.00
Hillcrest Convalescent Center	\$ 462.00
Wake County Rehabilitation Center - St. Mary's	\$ 458.12
Wake County Health & Rehab Center	\$ 458.12
UniHealth Post-Acute Care-North Raleigh	\$ 458.11
Universal Health Care/North Raleigh	\$ 448.73
The Rehabilitation and Nursing Center at Raleigh	\$ 444.65
The Heritage of Raleigh	\$ 444.65
UniHealth Post-Acute Care-Cary	\$ 444.65

BellaRose Nursing and Rehab Center	\$ 442.13
Universal Health Care/Fuquay Varina	\$ 442.13
Wake County Health & Rehab	\$ 432.00
The Rehabilitation and Nursing Center at Cary	\$ 427.09
St. Mary's Health & Rehab Center	\$ 420.00
Wake County Rehabilitation Center - Cedar Fork	\$ 392.84
UniHealth Post-Acute Care-Raleigh	\$ 375.00

- ◆ Liberty projects one of the lowest Medicare patient mixes of any applicant, and thus is not the most effective alternative from a patient access perspective.

Projected Medicare Payor Mix

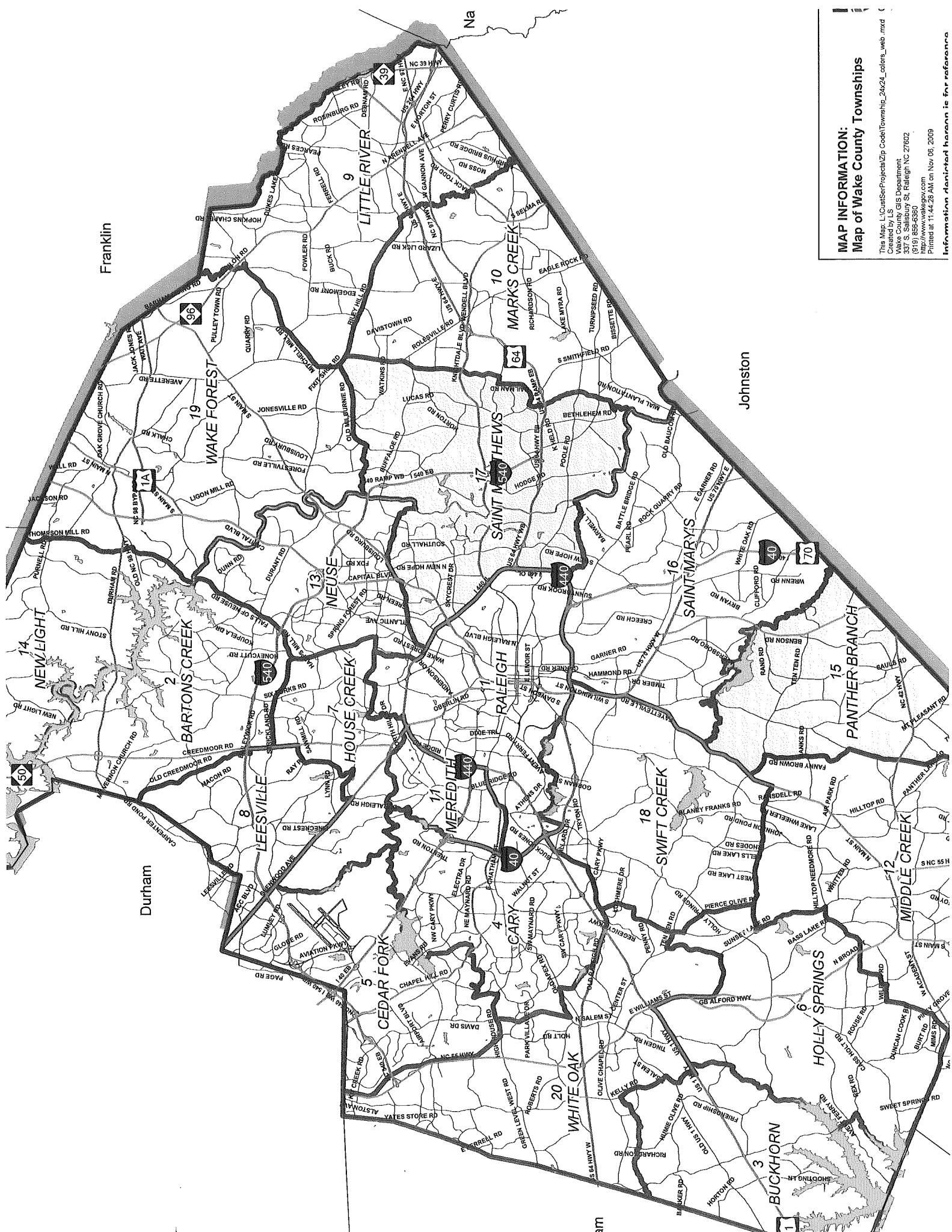
Applicants	Medicare Percent
Wake County Rehabilitation Center - Cedar Fork	32.3%
UniHealth Post-Acute Care-Cary	26.8%
BellaRose Nursing and Rehab Center	25.5%
Universal Health Care/North Raleigh	25.5%
Wake County Health & Rehab	25.2%
St. Mary's Health & Rehab Center	22.8%
The Heritage of Raleigh	21.7%
Hillcrest Convalescent Center	20.8%
Universal Health Care/Fuquay Varina	20.0%
Wake County Rehabilitation Center - St. Mary's	18.0%
Wake County Health & Rehab Center	18.0%
Wake County Rehabilitation Center - House Creek	17.1%
UniHealth Post-Acute Care-Raleigh	17.0%
UniHealth Post-Acute Care-North Raleigh	16.0%
The Rehabilitation and Nursing Center at Cary	16.0%
The Rehabilitation and Nursing Center at Raleigh	16.0%

- ◆ Liberty projects the fifth lowest Wake County patient origin of any applicant (see table below).

Projected Wake County Patient Origin

Applicants	Wake County %
Wake County Rehabilitation Center - House Creek	96.0%
UniHealth Post-Acute Care-North Raleigh	95.0%
UniHealth Post-Acute Care-Raleigh	95.0%
The Rehabilitation and Nursing Center at Cary	95.0%
The Rehabilitation and Nursing Center at Raleigh	95.0%
Wake County Health & Rehab	95.0%
St. Mary's Health & Rehab Center	93.0%
Wake County Rehabilitation Center - Cedar Fork	92.8%
Hillcrest Convalescent Center	92.8%
Wake County Rehabilitation Center - St. Mary's	92.0%
Wake County Health & Rehab Center	92.0%
Universal Health Care/North Raleigh	92.0%
The Heritage of Raleigh	91.8%
UniHealth Post-Acute Care-Cary	90.0%
BellaRose Nursing and Rehab Center	89.4%
Universal Health Care/Fuquay Varina	88.9%

Attachment 1 – Wake County Townships



MAP INFORMATION:
Map of Wake County Townships

This Map: L:\CustSer\Projects\Zip Code\Township_20x24_colors_web.mxd
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Information identified herein is for reference

Franklin

Johnston

Durham

UM