



North Carolina Department of Health and Human Services  
Division of Health Service Regulation

Pat McCrory  
Governor

Aldona Z. Wos, M.D.  
Ambassador (Ret.)  
Secretary DHHS

Drexdal Pratt  
Division Director

March 14, 2014

Doug Whitman  
Liberty Healthcare Management  
2334 S. 41<sup>st</sup> Street  
Wilmington, NC 28405

**No Review**

Facility: Liberty Commons Nursing and Rehabilitation Center  
Project Description: Construct 15 additional ACH rooms (and use the existing ACH rooms as NF rooms) to allow conversion of semi-private rooms to private rooms with no change in bed capacity  
County: Halifax  
FID #: 923116

Dear Mr. Whitman:

The Certificate of Need Section (CON Section) received your letter of February 19, 2014 and email of March 14, 2014 regarding the above referenced proposal. Based on the CON law **in effect on the date of this response to your request**, the proposal described in your correspondence is not governed by, and therefore, does not currently require a certificate of need. However, please note that if the CON law is subsequently amended such that the above referenced proposal would require a certificate of need, this determination does not authorize you to proceed to develop the above referenced proposal when the new law becomes effective.

Moreover, you need to contact the Construction and Nursing Home Licensure and Certification Sections of the Division of Health Service Regulation (DHSR) to determine if they have any requirements for development of the proposed project.

It should be noted that this determination is binding only for the facts represented by you. Consequently, if changes are made in the project or in the facts provided in your correspondence referenced above, a new determination as to whether a certificate of need is required would need to be made by the Certificate of Need Section. Changes in a project include, but are not limited to: (1) increases in the capital cost; (2) acquisition of medical equipment not included in the



**Certificate of Need Section**

[www.ncdhhs.gov](http://www.ncdhhs.gov)

Telephone: 919-855-3873 • Fax: 919-733-8139

Location: Edgerton Building • 809 Ruggles Drive • Raleigh, NC 27603

Mailing Address: 2704 Mail Service Center • Raleigh, NC 27699-2704

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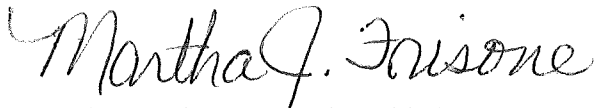


original cost estimate; (3) modifications in the design of the project; (4) change in location; and (5) any increase in the number of square feet to be constructed.

Please contact the CON Section if you have any questions. Also, in all future correspondence you should reference the Facility I.D. # (FID) if the facility is licensed.

Sincerely,

  
Benetta Thorne-Williams, Project Analyst



Martha J. Frisone, Interim Chief  
Certificate of Need Section

cc: Medical Facilities Planning Branch, DHSR  
Construction Section, DHSR  
Nursing Home Licensure and Certification Section, DHSR

**rhoe-jones, jane e**

---

**From:** Doug Whitman [DWhitman@libertyhcare.com]  
**Sent:** Friday, March 14, 2014 12:06 AM  
**To:** rhoe-jones, jane e  
**Cc:** Evans, Stephanie  
**Subject:** RE: Liberty Weldon, request for letter of no review  
**Attachments:** Weldon addition, cost certification letter from architect, 2-28-2014.pdf; Weldon Room Conversion, 2-26-2014.pdf

Hi Jane:

Thank you for reviewing our request for a no review letter for Liberty Commons Nursing and Rehabilitation Center of Halifax County, located in Weldon, NC (NH License # NH-0469, Facility ID #923116). I will attempt to answer your two questions below. I have also attached two documents that will hopefully provide more detail to our plan. Please let me know if you would like any additional information.

#### 1. Costs

- a. There are two portions of our project
  - i. Room conversion, and
  - ii. Construction of an addition to the building for a new adult care wing
- b. In my 2-28-2014 request letter
  - i. I failed to comment on any construction costs associated with the room conversion
  - ii. I only focused on construction costs of the addition to the building for a new adult care wing
- c. Room conversion...construction/renovation costs
  - i. After submitting our plans to DHSR Construction, we consulted with the assigned DHSR architect, and he advised us that no renovation or construction would be required for the room conversion portion of the project
  - ii. So, the construction cost for the room conversion is zero (I omitted this information in my 2-28-2014 letter)
- d. Addition of the new adult care wing...construction costs
  - i. The estimated cost of construction of the addition for the new adult care wing addition is \$820,581
  - ii. This is based upon the attached cost certification letter from our architect

#### 2. Project Description

- a. At our Weldon building, we operate 75 licensed beds as follows
  - i. 50 skilled nursing beds
  - ii. 25 adult care beds
- b. We propose to
  - i. Construct an addition for 15 of the 25 existing adult care beds, and
  - ii. Temporarily place these 15 adult care beds on hold until construction of the addition is complete
  - iii. These 15 adult care beds are empty, so there will be no impact to current residents

3/14/2014

- c. Room conversion
  - i. In the interim period during construction, we would like to go ahead and convert the rooms that are currently used for these 15 adult care beds to private skilled nursing rooms
  - ii. This will allow us to spread out some of our existing skilled nursing beds into private rooms that are currently in semi-private rooms
  - iii. This will improve services to our existing skilled nursing residents that are in semi-private rooms
  - iv. Please see the attached room conversion plan that would be in effect until construction of the new adult care wing is completed (I failed to include this drawing with my 2-28-2014 letter)
- d. No change in bed count
  - i. There is no change in the total bed count or bed type in this proposal
- e. During construction, this would leave us with
  - i. 50 licensed and active skilled nursing beds
  - ii. 10 licensed and active adult care beds, and
  - iii. 15 licensed and inactive adult care beds on hold until the construction is complete.
    - 1. We currently have fewer than 10 adult care residents
    - 2. so there will be no impact to existing residents and no reduction of access to services
- f. After construction, this would leave us with
  - i. 50 licensed and active skilled nursing beds
  - ii. 25 licensed and active adult care beds

Does this additional information and attachments respond to your questions? This project has been reviewed and approved by DHSR Construction Section, and will be reviewed by DHSR Nursing Home Licensure and Certification Section.

I would be happy to speak with you on Friday morning if you would like more information.

Thanks,  
Doug Whitman  
Development Director  
Liberty Healthcare  
910.512.2988

---

**From:** rhoe-jones, jane e [mailto:jane.rhoe-jones@dhhs.nc.gov]  
**Sent:** Thursday, March 13, 2014 3:19 PM  
**To:** Doug Whitman  
**Cc:** Evans, Stephanie  
**Subject:** Liberty Weldon, request for letter of no review  
**Importance:** High

Hi Doug,  
I will process this request for Bernetta. We do, as my voice mail indicated, need the following information before we can make a determination regarding your request:

3/14/2014

1. A cost estimate including all costs, including the renovations (cost breakdown).
2. A better description of the total project.

Thank you,  
Jane

Jane Rhoe-Jones  
N.C. Department of Health and Human Services  
Project Analyst, CON Section - Division of Health Service Regulation  
809 Ruggles Drive  
Raleigh, NC 27603  
2704 Mail Service Center  
Office: 919-855-3873  
Fax: 919-733.8139  
[jane.rhoe-jones@dhhs.nc.gov](mailto:jane.rhoe-jones@dhhs.nc.gov)  
[www.ncdhhs.gov/dhsr](http://www.ncdhhs.gov/dhsr)

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Architects Kurmaskie & Tolson Associates, Inc.  
1101 Haynes Street, Suite 003  
Raleigh, NC 27604  
(919) 846-1600 (919) 846-9404 fax  
www.architectsakt.com

February 28, 2014

Mr. Doug Whitman, MBA, NHA  
Development Director  
2334 South 41<sup>st</sup> Street  
Wilmington, NC 28403

Re: Liberty Healthcare Properties Of North Carolina – Liberty Commons Nursing & Rehabilitation of  
Halifax County, Weldon, North Carolina. – ACH Wing (25 Bed) Building Addition

Dear Mr. Whitman,

We examined the feasibility of several design alternatives for the construction of a new building addition with (13) Patient Rooms, Nurse Charting, and Living / Activity Spaces. Based on our final design (7,8000 S.F.), I would estimate the square foot cost for the new building addition will be approximately \$85.32 for a total new building addition budget of approximately \$665,496. This estimate would include general construction.

The total site development costs including demolition, grading, erosion control, site utilities, paving, walks, and landscaping will be approximately \$90,800. The architectural and engineering design / construction Administration fee will be approximately \$64,285. Thus, the total development costs for both the building and site improvements along with architectural and engineering fee would be approximately \$820,581.

The above square footages and estimates of costs are similar to several long term care nursing home projects we have completed in North Carolina and in the Southeast during the past two years.

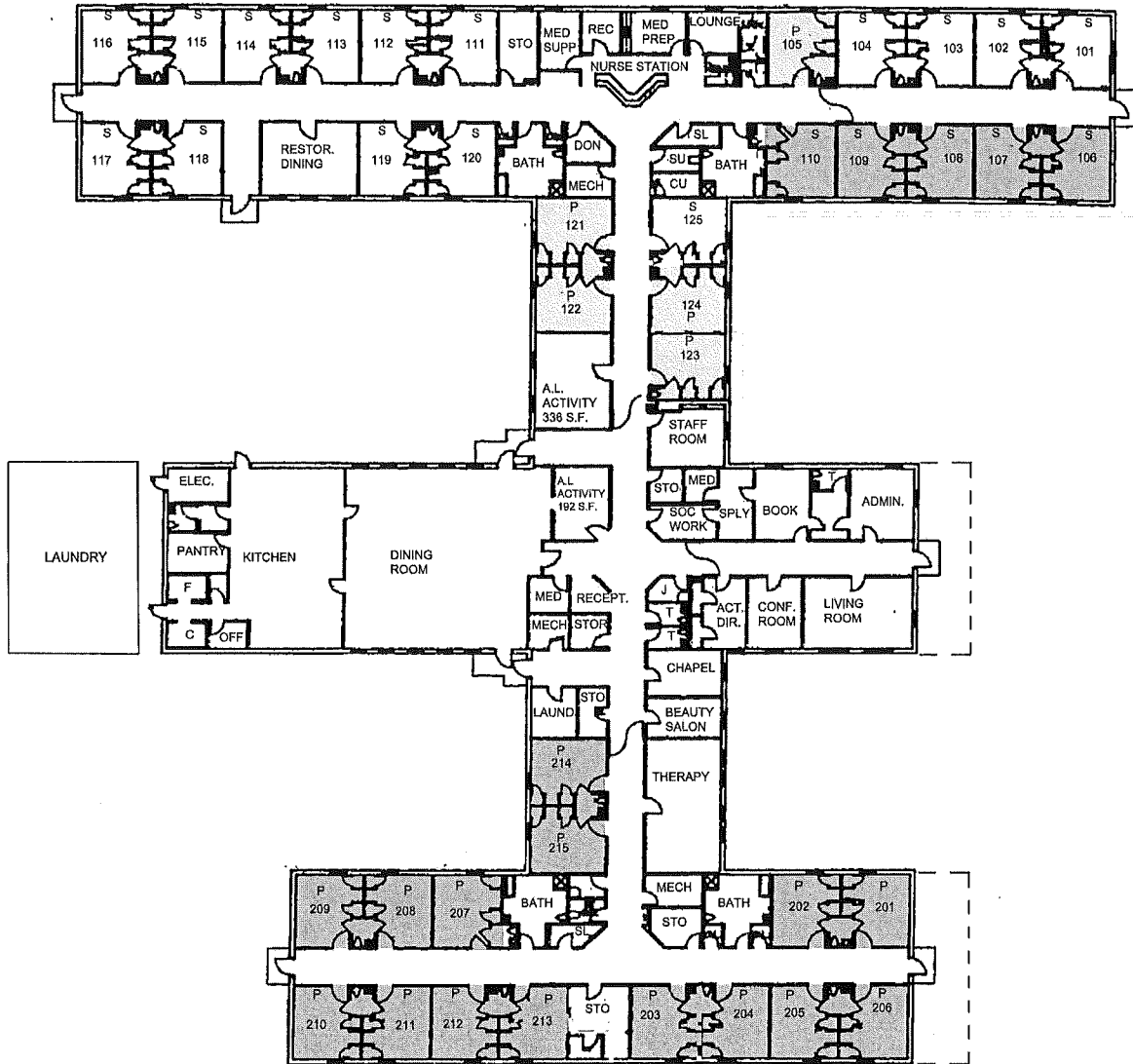
Sincerely,

A handwritten signature in black ink, appearing to read "Timothy Kurmaskie", written over a horizontal line.

Timothy Kurmaskie, AIA, NCARB

North Carolina Architect No. 10580  
North Carolina Corporation No. 51883

# EXHIBIT 2



**SEMI-PRIVATE SNF ROOMS  
CONVERTED TO PRIVATE SNF**  
(5 ROOMS: 105, 121, 122, 123, 124)  
1,220 SF AREA

**PRIVATE A.L. ROOMS  
CONVERTED TO  
PRIVATE SNF**  
(5 ROOMS: 208, 209,  
213, 214, & 215)  
1,205 SF AREA

**SEMI-PRIVATE A.L. ROOMS  
CONVERTED TO PRIVATE SNF**  
(10 ROOMS: 201-207, 210-212)  
2,413 SF AREA

**SEMI-PRIVATE SNF ROOMS  
CONVERTED TO SEMI-PRIVATE  
A.L.** (5 ROOMS: 106-110)  
1,193 SF AREA

## CONVERSION PLAN

### LIBERTY COMMONS NURSING & REHAB. CENTER OF HALIFAX CO.



**ARCHITECTS  
KURMASKIE  
&  
TOLSON  
ASSOCIATES,  
INC.**

Building A, Suite 003  
1101 HAYNES ST.  
Raleigh, NC 27604  
Phone: 919-846-1600  
Fax: 919-846-9404

EXISTING CON:  
75 BEDS (50 SNF / 25 A.L.)

PHASE 1 AL CONVERSION  
PROPOSED CON:  
60 BEDS (50 SNF / 10 A.L.)  
(15 A.L. BEDS ARE PLACED  
TEMPORARILY ON HOLD  
UNTIL PHASE 2  
CONSTRUCTION OF THE  
AL ADDITION IS COMPLETE.)

**PHASE 1-  
AL CONVERSION**  
05/02-12/07-18-13/02-26-14

**plan**

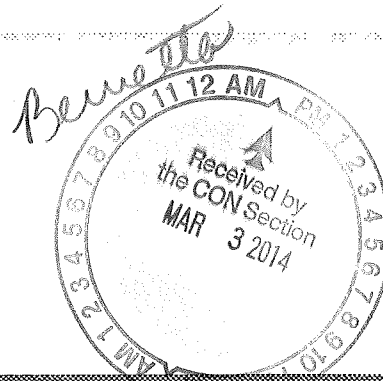
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# Liberty Healthcare Management



2334 S. 41<sup>st</sup> Street • Wilmington, NC 28403 • (910) 512-2988

February 19, 2014

Martha Frisone, Section Acting Chief  
Bernetta Thorne-Williams, Project Analyst  
NC Department of Health and Human Services  
DHSR Certificate of Need Section  
809 Ruggles Drive  
Raleigh, NC 27603

RE: Exempt from Review/ Liberty Commons Nursing and Rehabilitation Center of Halifax County, located in Weldon, NC; construct addition for 15 existing adult care beds, and temporarily place these 15 adult care beds on hold until construction of the addition is complete

Dear Ms. Frisone and Ms. Thorne-Williams:

I am writing to request a letter from the Certificate of Need Section acknowledging that the above referenced proposal is exempt from Certificate of Need review.

We operate 75 licensed beds at Liberty Commons Nursing and Rehabilitation Center of Halifax County, located in Weldon, NC (NH License # NH-0469, Facility ID #923116). Of these 75 licensed beds, 50 are skilled nursing beds, and 25 are adult care beds.

We propose to construct an addition for 15 of the 25 existing adult care beds and temporarily place these 15 adult care beds on hold until construction of the addition is complete, so that in the interim period during construction we can go ahead and convert the rooms (currently used for these 15 adult care beds) as private skilled nursing rooms (allowing us to spread out some of our existing skilled nursing beds that are in semi-private rooms). There is no change in the total bed count or bed type in this proposal.

This would leave us with 50 licensed and active skilled nursing beds, 10 licensed and active adult care beds, and 15 licensed and inactive adult care beds on hold until the construction is complete. We currently have fewer than 10 adult care residents, so there will be no impact to existing residents and no reduction of access to services.

I have enclosed our architectural floor plan and site plan for this proposed addition, which is under review at the DHSR Construction Section (Project ID #NH-2471). The estimated cost of construction of the adult care wing addition is \$820,581, based upon the enclosed cost.



certification letter from our architect. The cost of the addition is well below the \$2 million threshold that would trigger a Certificate of Need process.

The reasons we believe this proposal is exempt from Certificate of Need review include:

1. Our proposed change would not impact material compliance of our Certificate of Need
2. It does not involve any new licensed beds
3. There will be no impact to existing residents
4. There will be no reduction of access to services
5. The proposed construction of the addition would be on the existing site
6. The estimated cost of construction is below the \$2 million threshold

We believe that the proposal falls outside the requirement for a Certificate of Need, and we respectfully request a letter recognizing the project as being exempt from a Certificate of Need requirement.

Thank you for your consideration of this matter. If you should have any further questions regarding our proposal, please feel free to contact me.

Sincerely,

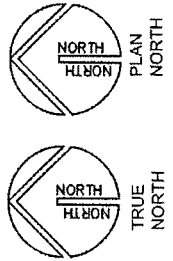


Doug Whitman  
Development Director  
[DWhitman@LibertyHCare.com](mailto:DWhitman@LibertyHCare.com)  
910.512.2988

Enclosures:

- Site Plan
- Floor Plans (2)
- Kurmaskie cost certification letter

EXHIBIT 3



EXISTING BUILDING  
CON: 75 BEDS- 50 SNF /  
25 ACH

PROPOSED 25 BED ACH ADDITION:  
13 ROOMS (1 PRIVATE,  
12 SEMI-PRIVATE)  
APPROX. 7,165 SF



ARCHITECTS  
KURMASKIE  
&  
TOLSON  
ASSOCIATES,  
INC.

Building A, Suite 003  
1101 HAYNES ST.  
Raleigh, NC 27604  
Phone: 919-846-1600  
Fax: 919-846-9404  
ARCHITECTSKT.COM

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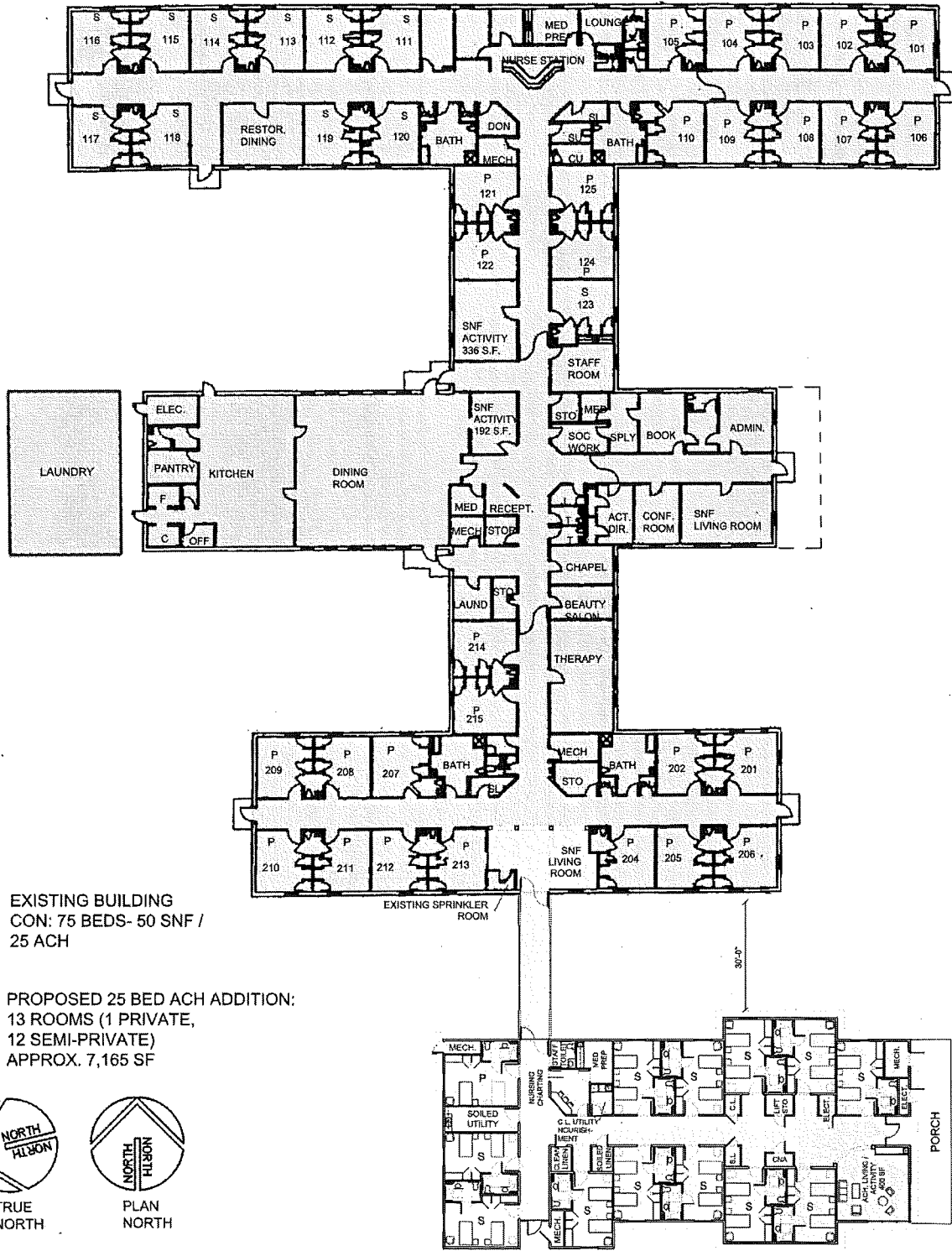
LIBERTY  
HEALTHCARE  
WELDON, NC

Phase 2- Proposed  
ACH Addition  
01-12-12/07-18-13

AERIAL  
SCALE: NTS

# EXHIBIT 4

## EXISTING FLOOR PLAN



EXISTING BUILDING  
CON: 75 BEDS- 50 SNF /  
25 ACH

PROPOSED 25 BED ACH ADDITION:  
13 ROOMS (1 PRIVATE,  
12 SEMI-PRIVATE)  
APPROX. 7,165 SF



TRUE  
NORTH



PLAN  
NORTH

### LIBERTY HEALTHCARE WELDON, NC - 1/12/2012 - CONCEPT

ARCHITECTS  
KURMASKIE  
&  
TOLSON  
ASSOCIATES,  
INC.

Building A, Suite 003  
1101 HAYNES ST.  
Raleigh, NC 27604  
Phone: 919-846-1600  
Fax: 919-846-9404

PHASE 2 -  
ACH-ADDITION 07/18/13

plan

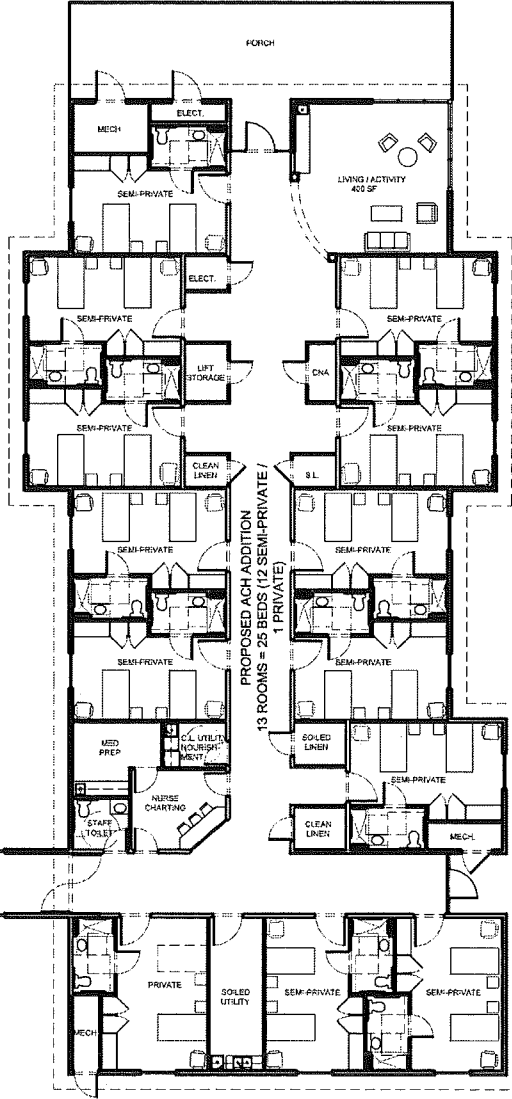
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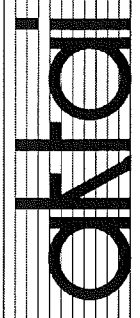
# EXHIBIT 5

EXISTING BUILDING



**AREA BREAK DOWN FOR ADDITION:**

RESIDENT ROOM:	3,172 SF (244 SF X (13) ROOMS)
RESIDENT SHOWER/TOILET:	728 SF (56 SF X (13) ROOMS)
LIVING /ACTIVITY:	400 SF
SUPPORT:	662 SF
STORAGE:	191 SF
CORRIDORS:	1,405 SF
WALLS:	607 SF
<b>TOTAL ADDITION:</b>	<b>7,165 SF</b>
<b>PORCH</b>	<b>652 SF</b>



ARCHITECTS  
KURMASKIE &  
TOLSON  
ASSOCIATES,  
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Raleigh, NC 27604  
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LIBERTY  
HEALTHCARE  
WELDON, NC

01/12/12  
07/18/13  
25 BED ADDITION

plan  
SCALE: 1/16" = 1'-0"



Architects Kurmaskie & Tolson Associates, Inc.  
1101 Haynes Street, Suite 003  
Raleigh, NC 27604  
(919) 846-1600 (919) 846-9404 fax  
www.architectsakt.com

February 28, 2014

Mr. Doug Whitman, MBA, NHA  
Development Director  
2334 South 41<sup>st</sup> Street  
Wilmington, NC 28403

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Halifax County, Weldon, North Carolina. – ACH Wing (25 Bed) Building Addition

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Sincerely,

A handwritten signature in black ink, appearing to read "Timothy Kurmaskie", written over a horizontal line.

Timothy Kurmaskie, AIA, NCARB

North Carolina Architect No. 10580  
North Carolina Corporation No. 51883