



Aronberg Goldgehn Davis & Garmisa
225 W. Washington St., Suite 2800
Chicago, Illinois 60606
TEL: 312-828-9600
FAX: 312-828-9635
www.agdglaw.com

Anne Cooper
DIRECT: 312-755-3169
DIRECT FAX: 312-828-9635
acooper@agdglaw.com

OUR FILE NUMBER: 106193-000100

October 22, 2025

Via Email

Mr. Michael Constantino
Project Reviewer
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

RE: Oak Hill Senior Living and Rehabilitation Center (Project No. 25-031)

Dear Mr. Constantino

This office represents Accolade Ventures LLC and Accolade Healthcare of Waterloo LLC (the "Applicants"). In this capacity, we are responding to the Illinois Health Facilities and Services Review Board (the "State Board") letter dated October 15, 2025, requesting additional information on Type A and Type AA violations for Accolade Healthcare facilities in Illinois. Attached at Attachment – 1 is a list of Type A and AA violations that occurred from 2022 to 2025.

Please let me know if you have any questions or need anything further.

Sincerely,

A handwritten signature in black ink that reads 'Anne M. Cooper'.

Anne M. Cooper

Attachment - 1

Accolade Healthcare
Type A Violations by Facility
2022 - 2025

Facility	Date	Type A Violation	Description
Accolade Healthcare of Danville	1/9/2024	300.610(a)	Facility failed to provide a safe, functional air mattress to prevent fall from bed; failed to thoroughly investigate the environment to determine a targeted root cause, to repair or replace air mattress
		300.1210(b)	Failures resulted in resident sustaining a head injury and lacerations requiring emergency medical care at a local hospital
		300.1210(c)	
		300.1210(d)	
Accolade Healthcare of Paxton on Pells	3/10/2024	300.610(a)	Facility staff failed to provide safe transfer for a resident when using a mechanical lifts for transfer
		300.1210(b)	The failure resulted in resident sustaining a non-displaced fracture to the
		300.1210(c)	
		300.1210(d)(6)	
Accolade Healthcare of Paxton on Pells	7/1/2024	300.610(a)	Facility failed to prevent a fall by failing to explain cares and ensure safety while elevating a bed for a resident
		300.1210(b)	The failure resulted in a resident falling from the bed to the floor and sustaining a skull fracture with a brain bleed
		300.1210(d)(6)	
Accolade Healthcare of Danville	7/30/2024	300.610(a)	Facility failed to routinely assess and monitor a bruise/hematoma (bruising with blood pooling underneath the skin), update the physician, and assess and measure post-surgical wounds upon readmission
		600.690(a)	The failure resulted in a resident's left foot bruise/hematoma becoming infected and requiring hospital operative incision and draining
		300.1210(b)	
		300.1210(c)	
		300.1210(d)(3)	

Facility	Date	Type A Violation	Description
Accolade Healthcare of Paxton on Pells	12/5/2022	300.1210(b)	Facility failed to identify a self-closing door as an accident hazard and failed to transfer a resident per the plan of care and assessment for a
		300.1210(d)(6)	These failures resulted in a resident sustaining a post-traumatic amputation of the right third finger distal phalanx (fingertip)
		300.2900(d)(7)	
Accolade Healthcare of Danville	8/16/2023	300.610(a)	Facility failed to safely transfer one resident.
		300.1210(b)	This failure resulted in a resident sustaining a left proximal fibula fracture
		300.1210(c)	
Accolade Healthcare of Paxton on Pells	10/24/2023	300.1210(d)(6)	
		300.610(a)	Facility failed to timely report a resident fall to the resident's representative
		300.1010(h)	This failure resulted in resident experiencing uncontrolled pain and delay in treatment in the resident's left hip fracture following the fall.
		300.1210(a)	Facility failed to complete post fall neurological assessments/monitoring, identify a change in condition, and properly transfer a resident following a
		300.1210(b)	This failure resulted in resident experiencing uncontrolled pain and delay in treatment in the resident's left hip fracture following the fall.
Accolade Healthcare of Peoria	2/9/2022	300.1210(d)(3)(6)	Facility failed to document a fall in the resident medical record and failed to prevent resident falls by failing to thoroughly investigate falls and
		300.610(a)	These failures resulted in a resident falling and sustaining a dislocated right
		300.1210(b)	Facility failed to have fall mat interventions in place from a prior fall for a
		300.1210(c)	This failure resulted in the resident obtaining a subdural hema toma, and a forehead laceration with three sutures.
		300.1210(d)(6)	
Accolade Paxton Senior Living	8/3/2022	300.2340(a)	
		300.610(a)	The facility failed to complete a transfer for a resident according to the resident's plan of care for a resident reviewed for accidents
		300.1210(b)	This failure resulted in a resident sustaining a right humerus fracture (injury to the bone of the upper arm that connects the shoulder to the elbow). Resident was admitted to the hospital
		300.1210(d)(6)	
		300.3240(a)	

Facility	Date	Type A Violation	Description
Accolade Paxton Senior Living	8/16/2022	300.610(a)	Facility failed to (1) provide adequate supervision and assistance during care and (2) failed to replace a malfunctioning air mattress to prevent a fall for one resident reviewed for falls
		300.1210(b)(5)	This failure resulted in a resident to fall resulting in sutures to his right eyebrow and a black eye and several skin tears.
		300.1210(c)	
		300.1210(d)(6)	
		300.1220.(b)(2)	
		300.1220(c)	
		300.3100(d)(2)	
		300.3240(a)	