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October 22, 2025

Illinois Health Facilities and Service Review Board
525 West Jefferson Street (2nd Floor)
Springfield, IL. 62761

SUBJECT: Written Comment for Proposed Project #25-031, Oak Hill Senior Living Rehabilitation Center, 623 Hamacher Street, Waterloo, Illinois.

Illinois Health Facilities and Service Review Board:

As a retired RN, taxpayer, and lifelong resident of Monroe County, I have many concerns with the proposed 5-year lease and potential sale of Oak Hill to Accolade Ventures LLC and Accolade Healthcare of Waterloo.

For 35 years I worked at Monroe County/Oak Hill as a Registered Nurse; Staff Development Coordinator; Certified CNA instructor; assisted in establishing an Alzheimer's Unit and eventually became DON until my retirement.

I have had many loved ones who have lived at Monroe County Nursing Home/ Oak Hill when staying at home was no longer an option. I was thankful that they were able to live in a facility in their home town and for the staff that gave excellent care and treated them with respect and many times going above and beyond what was expected of them.

Issues noted in the Purpose of the Project by the County Commissioners.

#1. The County no longer has the expertise to operate a skilled nursing home. (When the commissioners put their name on the ballot, they knew that the nursing home would be part of their responsibility as it has been in the past 75 years.) Do they have the expertise to operate a Sheriff's Department, County Ambulance, Road District, etc.? Should they exit those businesses as well?

For 75 years the County has owned and supported the nursing home. County Commissioners were farmers, business owners and even a state highway patrol officer. There were difficult times in the past years with operating a county nursing home but the Commissioners did not give up. The difference is they found a way to receive assistance with overseeing the nursing home while maintaining the excellent reputation it had without giving up ownership and still

having control of the nursing home. For example, one solution was to contract with a management firm. The firm with their expertise increased census, helped navigate a union contract when employees voted for a union. They saw the need for a new state of the art facility resulting in building the current Oak Hill which the taxpayers supported through a referendum. They also hired a competent Administrator and with time their expertise was no longer needed. The nursing home continued to grow with the addition of a short term rehabilitation unit that was paid for without tax dollars.

The Commissioners want to focus on public safety and essential services. One would believe that the nursing home is an essential service for the community and is part of public safety assuring our residents have a safe place to live when no longer able to stay in their home.

#2. Staffing issues was noted as another reason for “exiting the business”. **Transparency?** Taxpayers were not provided data or financial reports to substantiate increased staffing costs and costs related to agency staffing. COVID resulted in staffing issues and increased costs for everyone in the health care industry. The 5 and recently 4-star rating for staffing indicates the facility was able to maintain above average staffing at Oak Hill. However, the average of 1.5-star rating for Accolade Healthcare facilities in Illinois (for profit LLC) indicates they have staffing issues in the facilities they currently own. How do they expect to change Oak Hills staffing difficulties if they have not addressed the problem in the facilities, they currently own?

#3. The Commissioners reported a potential billing issue by an inexperienced biller, had an independent audit conducted and engaged a lawyer to settle the overpayment. **Transparency?** The taxpayers have not been given an official report of the audit, the financial impact of the audit, possible fines, and additional costs due to the potential billing issues. All of which, according to the Commissioners, increases the tax burden for the Monroe County residents. When asked at a board meeting board meeting (after the billing issue was disclosed) when the results of the audit would be available it was stated it would be sometime in November. A search for a company to lease the nursing home was started prior to March. The Commissioners have a responsibility to keep taxpayers informed and to hear their comments in regards to the burden it MAY place on the taxpayers. The taxpayer’s voices need to be heard if the commissioners feel it is a burden to them.

#4. Commissioners indicate a new operator with expertise in owning and operating a skilled nursing facility will allow the home to expand its services to allow admitting higher acuity residents with tracheotomies, dialysis, and complex wound care. Taking higher acuity residents will only increase the staffing needs to meet their needs, higher acuity results in increased care and that relates to increased staffing. If present staffing is a concern why would services requiring increased staff be added to a facility with “staffing issues”. Where is the data to show

how many potential residents have been turned away due to lack of those services for the higher acuity residents?

There is a need for a certified Alzheimer's/Dementia unit that is currently being provided at Oak Hill on their certified Alzheimer Unit. It appears Accolade does not think there is a need for the certified unit. It was announced at a staff meeting that the unit will be decertified. This change is decreasing services to those residents with Alzheimer's diagnosis that the facility is currently providing. Where will residents that require services of a certified unit go? There is no facility close to Waterloo that has a certified unit. There is no cure for Alzheimer's and those residents with this diagnosis require and need specialized units to provide services they need. Keeping the unit certified does not increase Oak Hill's staffing needs and current staff are trained to work on this unit. If Accolade Healthcare decertifies the unit, it would be decreasing essential services to a much-needed senior resident population.

Change of ownership of Oak Hill to Accolade Health Care/Accolade Venture will have a SIGNIFICANT impact on the approximately 200 employees. Most of those employees live in our community or in a neighboring town. They will no longer be eligible for the IMRF retirement plan. Those employees with less than 10 years (vested with 10 years of service) of employment will need to withdraw their contributions and forfeit the portion of the employer's contributions. Employees have not been given the full picture of what will happen to their benefits such as vacation, sick time, holidays. Will Oak Hill retain their current staff with these changes? How many will leave and go to another facility? How many nurses will exit Oak Hill to work for another facility or hospital? If staff terminate their employment at Oak Hill, it will only add to the "staffing issues" if they will be replaced by the new owners.

The commissioners have lacked **TRANSPARENCY** to the taxpayers of Monroe County. There was only one meeting for comments from the public on August 26th. There was a packed room with standing room only and lasted around 2 hours or more. There were many questions asked and comments not favorable for leasing Oak Hill. To this date there have been no further community meetings with the Commissioners to provide answers (with out disclosing confidential legal information) to the questions asked. The change of ownership was being discussed at least 6 months and more without informing the taxpayers of their plans and asking for comments. Other options that were available were not shared with the taxpayers; taxpayers were not asked their thoughts on increased taxes to keep the facility county owned. Taxpayers were not involved with any decisions on a facility built with a tax referendum voted in by the taxpayers. How can the Commissioners decide to lease Oak Hill, **built after a tax referendum passed supporting a new facility**, without asking the taxpayers what they want?

In the Purpose of the Project the Commissioners wrote the following.

“The purpose of this project is to ensure the residents of Monroe County continue to have access to quality long-term care services, and to ensure that there will be a continued commitment to the provision of care to the underserved and indigent residents of Monroe County. Changing the licensee of the Nursing Home will improve access to **high quality skilled nursing home services** for residents of Monroe County.”

After researching information provided by CMS, I am not confident that a lease to Accolade Healthcare of Waterloo will “improve access to high quality skilled nursing home services for residents of Monroe County”. I have included an attachment of the star ratings, number of complaints for the last 3 years, number of fines for the last 3 years, total cost of the fines and number of payment denials. I have also included the same information for Oak Hill. I have concerns that the care the residents will receive once the lease is granted will not be the care the residents of Monroe County have been receiving. The Commissioners wrote “the Nursing Home does not have a clinical team of managers that can oversee day-to-day care” does not give credit to the nursing staff currently employed at Oak Hill that have maintained 4- and 5-star ratings. If Accolade Healthcare has a clinical team to oversee day-to-day care why do their facilities have numerous complaints, fines, and low star ratings?

Due to lack of transparency from the Commissioners, expressed concerns opposing the lease of Oak Hill from numerous citizens and information from CMS of the six facilities currently owned by Accolade Healthcare I **oppose** the proposition to lease Oak Hill to Accolade Healthcare of Waterloo, LLC /Accolade Healthcare LLC.

Now you the board (without emotional ties to Oak Hill) after reviewing letters received in regards to the CON, public comments at the meeting on October 8th, and Accolade Healthcare’s performance rating must decide if changing ownership to Accolade Healthcare is in the best interest of Oak Hill and the community. Thank you for your time and consideration in regards to this proposal.

Respectfully,

Donna DeWilde