

Memorandum to the Commissioner

Applicant: Town of Nantucket

Facility: Our Island Home
9 East Creek Road, Nantucket, MA 02554

Project Number: N/A

Filing Date: April 4, 2025

Introduction

This memorandum presents, for Commissioner review and Final Action, the Determination of Need (DoN) Program's recommendation regarding a request for transfer of site by the Town of Nantucket (Applicant or Town) concerning Our Island Home (OIH), a skilled nursing facility (SNF) with 45 licensed beds, including 22 Level II beds and 23 Level III beds owned and operated by the Applicant.

The Applicant submitted an Application consisting of a letter and project narrative, to the DoN Program on March 6, 2025 in which it proposes to build a new facility on land owned by the Applicant at Sherburne Commons Way in Nantucket and later demolish the current OIH facility located at 9 East Creek Road, Nantucket, MA. The Applicant is proposing to transfer the site of OIH's licensed 45 beds to the new replacement facility, while maintaining the same levels of care. The Applicant will remain the owner of the facility, and existing residents of OIH will be safely transferred to the new facility upon project completion. The Applicant plans to repurpose the existing site at 9 East Creek Road for a new Senior Center.

The replacement facility will be licensed as a long-term care (LTC) facility, as required pursuant to Chapter 111 Section 71. There will be no change to OIH's licensed bed capacity, or care levels.

The DoN program finds that there is a need for the Proposed Project, without the full DoN process, as it is clear that: 1) the existing facilities' Patient Panel is comprised of OIH residents, 2) the existing facility is outdated and does not meet practices for patient care of current Department of Public Health (DPH) regulations for nursing support and mechanical systems, 3) the replacement facility will be located on land owned by the Applicant; and 4) the replacement facility will ensure continued operation of a local SNF and reduce off-island travel for such care.

This memorandum incorporates by reference the project description that was provided by the Applicant.

Because the applicant is a government agency, this request is subject to delegated review, pursuant to 105 CMR 100.630.

Background

OIH was built in 1981. The current facility has 3 private rooms and 21 semi-private rooms. None of the 21 semi-private rooms are equipped with showers or bathtubs. Current resident room bathrooms are undersized, and predominantly not compliant with the requirements in the Americans with Disabilities Act (ADA). Resident rooms also lack ceiling lifts, creating safety challenges for staff and residents. The current layout of the facility includes:

- 3 resident care wings
- 1 wing for services and storage area
- 1 modestly sized room used as an Activity Room and a Living Room
- 1 Dining Room
- 1 Rehabilitation Space
- 2 Communal Showers that serve the entire facility
- Core Nursing Station lacking visible sight lines to resident care wings

The Applicant states that major upgrades are needed to continue operating the facility and that increasing the size of the facility is the only way to make necessary changes to meet requirements and standards.

The Applicant states that the following major plant upgrades are needed to continue operating the current OIH, the details of which are included in the Applicant's submission:

- Upgrades to Fire Suppression Systems
- Upgrades to Heating, Ventilation, and Air Conditioning (HVAC) System
- Upgrades to Facility-wide electrical needs
- Upgrades to wastewater piping
- Replace dining room and kitchen cabinetry, wash sink station, garbage disposal, and dishwasher
- Refurbish and modernize west wing shower
- Replace generator and shed
- Upgrades to Information Technology (IT) infrastructure
- Replace exterior trim, siding rake boards, patio and parking lot
- Replace cedar fencing around facility patio area
- Upgrades to garage

The Applicant states that within the existing facility, the Town and Facility design team's focus on expanding and enhancing staff capabilities and programs to improve the quality of care for residents has helped to increase OIH's Centers for Medicare and Medicaid (CMS) Star Rating

from 1 Star to 4 Stars in the past year.¹ The Applicant states that it evaluated several options for expanding and rebuilding the existing facility, but found the options to not be feasible.

The Applicant states that the Town has recognized need for the new facility to improve nursing home care for residents for a long time, citing proposals for such changes dating back to 1996.

The Applicant notes the following about the planning process for the Proposed Project:

- The relocation of OIH to Sherburne Commons was approved at the Spring 2022 Annual Town Meeting
- The Proposed Project has two standing committees to ensure proper project governance and broad community input: a Steering Committee and an Advisory Committee
- Final Approval of the Proposed Project, and project costs will be sought at the May 2025 Annual Town Meeting and Annual Town Election

The Proposed Project

Square Footage

The Applicant is proposing to increase the size of the facility from its current 25,000 sq. ft. to 59,267 sq. ft. The Applicant maintains that increasing the size of the facility will better serve residents and provide the flexibility needed to meet future needs.

Resident Rooms

The Applicant is proposing several improvements to resident rooms, including all private rooms equipped with walk-in showers and toilets. Resident rooms will be spaced large enough to comfortably accommodate families and visitors, and will include ceiling lifts to support resident safety. The Applicant states that the proposed upgrades to resident rooms will allow for better infection control, will enhance resident privacy and dignity, and will encourage independent functioning, where appropriate. The Applicant states further that private rooms are associated with improved sleep patterns, a reduction in aggression/irritation, and a reduction in medication errors.

The Applicant states that it has also included a Person of Size room, two connected rooms, and a Hospice suite, with dedicated areas for families, in the planning.

Resident Wings

The Applicant is proposing resident wings, that are designed as neighborhoods, with designs that encourage a home-like environment for residents.

¹ Medicare. Nursing Home: Our Island Home.

<https://www.medicare.gov/care-compare/details/nursing-home/225772?city=Nantucket&state=MA&zipcode=>

Nurse and Certified Nursing Assistant (CNA) Stations

A central nursing core area toward each of the resident wings will offer a view of resident wings, and CNA stations placed at the end of corridors will allow for additional observation and charting.

Rehabilitation/Physical Therapy (PT) Area

The Applicant states that the rehabilitation/PT area will be equipped to aid in short-term and long-term resident recovery. The area will include an activities of daily living (ADL) component, a ceiling lift with walk assist to aid in resident safety, and an outdoor area specific to rehabilitation.

Additional design features to promote resident safety, and improved health outcomes and quality of life include:

- Recessed room entry way that will resemble private entry way of a home
- Outdoor, enclosed courtyards adjacent to all resident care areas, allowing for more access to natural light, and increased, safe access to outdoor activities
- Large windows at the end of each hallway to allow for access to natural light
- Attached wings with smaller connector bridges facilitating residents to move safely throughout the facility
- Open dining concept for dining and activity spaces, that will allow for large and group activities
- Lounge areas that provide areas for residents to spend quiet time

Public Comments on the Application

Any person, and any Ten Taxpayer Group (TTG), may provide written or oral comment at any time during the first 30 days following the Filing Date of an Application, or during the first ten days after a public hearing. The Department did not receive any public comments on this application nor did any TTGs form in connection with this application.

Findings

Staff find that the Proposed Project addresses Patient Panel need for the provision of high quality care to improve residents' health outcomes, quality of life, and well-being. Based on a review of the materials submitted, staff finds that there is a need for the Proposed Project and recommends that the Commissioner approve this Application for Determination of Need.