



Health and Human Services

2025 Iowa Certificate of Need (CON) Application

Instructions: 1. Complete all the sections below. 2. Provide concise, evidence-based responses, with supporting documentation or data as needed. 3. Reference Iowa Code 10A.714, as needed, to complete the application. 4. Upload additional documentation, as needed.

Primary Contact

Ms. Jean Shelton

Primary Contact Employer

On With Life

Primary Contact Email

jean.shelton@onwithlife.org

Facility Name

On With Life

Facility Address

715 SW Ankeny Road, Ankeny, Iowa 50023

Project Title

Ankeny 2-Bed Expansion Project

Project Type

Change in bed capacity

1. Applicant and Facility Overview

a. Project Purpose and Objectives:

On With Life is an Iowa nonprofit that serves individuals with highly complex brain injuries and other neurological injuries. On With Life began as the dream of eight families - a dedicated, passionate group of survivors and their families faced with the challenge of rebuilding lives shattered by brain injury. Their dedication resulted in a post-acute program focused on the unique and complex needs of brain injury survivors. On With Life opened its Ankeny Campus in 1991. Since opening its Ankeny Campus, On With Life has expanded from a post-acute inpatient program in a single location to seven programs across multiple campuses, serving thousands of individuals each year.

In 2024, On With Life's affiliate (On With Life Extended Services, Ltd.) opened the Polk City Campus to serve this unique population. The facility is a one-of-a-kind facility in the state of Iowa. The facility replaced a smaller facility On With Life had operated for many years in Glenwood, Iowa. On With Life purchased an existing nursing facility in Polk City and invested more than \$12 million to offer a modern, homelike environment for residents in Polk City.

On With Life now seeks to add two (2) nursing facility beds to its 28-bed free-standing nursing facility located on its Ankeny Campus. The proposed addition of this limited number of beds at minimal cost would help to fill the complex and very specialized need of persons served at the Ankeny Campus. It would also allow On With Life to serve more persons at its nearby 40-bed nursing facility located at On With Life's

Polk City Campus.

b. Relationship to Long-Range Development Plan:

This project is “Phase 1” of On With Life’s long-range development plan and must be completed before On With Life would be able to commence the second phase of its plan.

“Phase 2” of that plan would involve constructing an addition on the Polk City Campus to ensure long-term sustainability and to accommodate individuals requiring ventilator support. The addition would offer approximately 25 new beds and would be designed to meet the highly complex medical needs of this population. Phase 2 of this development plan is outside the scope of this CON application.

c. Description of Proposed Service/Program:

On With Life seeks to add two (2) nursing facility beds to its 28-bed free-standing nursing facility located on its Ankeny Campus. A floor plan of the proposed project has been uploaded with this application as “Floor Plan – On With Life 2-Bed Expansion Project.”

d. Target Population: Specify geographic and demographic areas.

The target population for this project consists of persons with highly complex brain injuries and other neurological injuries. The persons served at On With Life are unlike the residents of any other nursing facility in Iowa. Since these are individuals who have experienced brain injury or other neurological injuries, they are often much younger than typical nursing facility residents and will often spend the majority of their lives under the care of On With Life and its dedicated team of professionals. These persons served also typically have much more complex care needs than the residents of a typical nursing facility. Due to the unique nature of the services On With Life provides, there are no similar providers in Iowa. As a result, On With Life serves a statewide population.

e. Relation to Existing Provider Network: Summarize relationship with other health care providers/services in the region.

On With Life works closely with hospitals and other health care providers from across Iowa to provide access to care for individuals with highly complex brain injuries and other neurological injuries. There are no other providers in Iowa that provide the care and services needed for this extremely complex and unique population. In particular, On With Life works closely with ChildServe to serve individuals who age out of ChildServe’s Complex Care Unit. ChildServe has provided a letter of support for this project, which has been uploaded with this application.

While this project is for On With Life’s Ankeny Campus, its impact will be felt by persons served at both the Ankeny Campus and the Polk City Campus. In order to meet the urgent need for ventilator beds on its Polk City Campus, On With Life has identified space on the Ankeny Campus that could comfortably accommodate the proposed two (2) additional beds. On With Life has also identified two specific individuals on the Polk City Campus who could benefit from moving to the Ankeny Campus. If approved, On With Life would move these two persons served from the Polk City Campus to the Ankeny Campus to make two ventilator beds available in Polk City for young adults aging out of the ChildServe facility.

f. Funding Sources and Financial Resources: Identify and document sources of funding and financial viability.

The total cost associated with the proposed project is \$480,185, which includes construction costs of \$330,185 and \$150,000 for furniture, fixtures, and equipment. The furniture will include beds, a call system, tables, chairs, an overhead lift or Hoyer lift system, adaptive equipment, and supplies. (Although outside the scope of this project, On With Life will also acquire ventilator systems for two beds on its Polk City campus.)

Current # of Beds (if changing)
28

Current bed type (if changing)
n/a

Requested # of Beds (if changing)

Requested bed type (if changing)

Document Upload

CON Bed Utilization Statistics - On With Life.pdf

Floor Plan - On With Life 2-Bed Expansion Project.pdf

2. Community Need and Service Gaps

a. Description of Need:

The need for this project is based on the consistently high census at On With Life's campuses in Ankeny and Polk City.

The persons served at On With Life are unlike the residents of any other nursing facility in Iowa. Since these are individuals who have experienced brain injury or other neurological injuries, they are often much younger than typical nursing facility residents and will often spend the majority of their lives under the care of On With Life and its dedicated team of professionals.

The persons served at On With Life also typically have much more complex care needs than the residents of a typical nursing facility. On With Life's Medicaid case-mix index ("CMI") is typically among the highest in the state. The CMI is a metric used in healthcare to measure the diversity, complexity, and severity of patients treated in a healthcare facility. During the quarter ended December 31, 2024, the total CMI at the Ankeny Campus was 1.6712 and the total CMI at the Polk City Campus was 1.9975. By contrast, the average CMI for Iowa nursing facilities during that period was 1.3077. In fact, On With Life's Ankeny Campus and Polk City Campus held the third and sixth highest CMIs, respectively, of all nursing facilities in the state during that period.

On With Life takes tremendous pride in providing high-quality, patient-centered care for persons served in its facilities. These facilities are often a lifetime "home" for these individuals, so On With Life goes to great lengths to make the campus feel like home. On With Life's CMS star rating reflects this focus on high-quality care centered around the persons served. CMS has rated the Ankeny Campus as a five-star facility meaning its overall rating is much above average.

As described above, the impact of this project will be felt by persons served at both the Ankeny Campus and the Polk City Campus. In order to meet the urgent need for ventilator beds on its Polk City Campus, On With Life has identified space on the Ankeny Campus that could comfortably accommodate the proposed two (2) additional beds. On With Life has also identified two specific individuals on the Polk City Campus who could benefit from moving to the Ankeny Campus. If approved, On With Life would move these two persons served from the Polk City Campus to the Ankeny Campus to make two ventilator beds available in Polk City for young adults aging out of the ChildServe facility.

b. Assessment of Existing Services and Gaps:

On With Life takes tremendous pride in providing high-quality, patient-centered care for persons served in its facilities. These facilities are often a lifetime "home" for these individuals, so On With Life goes to great lengths to make each campus feel like home. On With Life's CMS star rating reflects this focus on high-quality care centered around the persons served. CMS has rated the Ankeny Campus as a five-star facility meaning its overall rating is much above average.

c. Alternatives Analysis:

On With Life has concluded there is not a less costly or more effective alternative to the proposed project. On With Life is proposing to add two (2) nursing facility beds in existing space at a minimal cost of \$480,185.

d. Accessibility Considerations:

As a unique provider of services to individuals with highly complex brain injuries and other neurological injuries, On With Life serves individuals from across Iowa—including many individuals who live outside of metro areas. Without the services On With Life offers, many of these individuals would have no choice but

to leave the state for the care they receive at On With Life.

e. Community Input/Support:

On With Life has received a letter of support for this project from ChildServe. As noted above, On With Life works closely with ChildServe to serve individuals who age out of ChildServe's Complex Care Unit. On With Life has also received a letter of support for this project from City of Ankeny.

Document Upload (if needed)

Letter of Support - ChildServe (10-03-25).pdf

Letter of Support - City of Ankeny (10-27-25).pdf

f. Non-discriminatory Access:

On With Life serves all individuals and does not discriminate on the basis of race, ethnicity, creed, color, religion, national origin, ancestry, citizenship status, age, disability status, sex, familial status, veteran status, sexual orientation, gender identity, genetics, or any other characteristic protected by applicable federal, state, or local laws.

3. Impact on Existing Providers

a. Impact Assessment:

On With Life is proposing to add only two (2) nursing facility beds. These beds will accommodate individuals with highly complex brain injuries and other neurological injuries. As a result, On With Life does not expect this project to have any impact on other area providers.

b. Community and Economic Impact: Broader system effect and value-added to the community.

On With Life is proposing to add only two (2) nursing facility beds in existing space on its Ankeny Campus. Given the limited scope of this project, On With Life does not anticipate the project will have a significant economic impact on the community. The effect of this project will be felt by the persons served. It should also be noted that in the future, Phase 2 of On With Life's long-range development plan would not only add jobs but would also secure services at a local level to allow individuals to receive care close to home. High-quality ventilator services are few and far between, so Phase 2 of On With Life's long-range plan will help to meet the needs of this very special population.

c. Efficiency in Use of Resources: Shared/cooperative arrangements to maximize efficiency.

As discussed throughout this application, On With Life is a unique facility in terms of the persons it serves. There are no similar providers in the Iowa with which On With Life could share services. On With Life works closely with other area health care providers to ensure access to the unique services it provides.

4. Financial and Operational Feasibility

a. Financial Projections and Feasibility:

The proposed project will be funded from cash on hand. A project budget has been uploaded with this application as "Project Budget – On With Life.pdf." Three-year projections have been uploaded as "Financial Projections – On With Life.pdf."

Document Upload (3-year budget projections)

Project Budget - On With Life.pdf

Financial Projections - On With Life.pdf

b. Staffing and Operations:

Given the limited scope of this project, On With Life does not anticipate a significant impact on staffing. On With Life will adjust staffing based on census, acuity, and need. On With Life occasionally needs to add

staff but not necessarily all the time. On With Life expects to hire a full-time respiratory therapist and to increase medical coverage once the Ankeny remodel is complete. (Although it is outside the scope of this project, On With Life expects more significant staff additions in Phase 2 of its long-range plan.

c. Short and Long-term Viability:

On With Life consistently operates at or near capacity.

5. Community and Economic Impact

a. Community Engagement:

On With Life is very engaged in the communities in which it operates its facilities—including Ankeny and Polk City. On With Life works closely with area leaders to ensure the persons served in its facilities have access to the highest quality care possible. In fact, the Mayor of Ankeny, Bobbi Bentz, wrote a letter of support for this project. That letter of support has been uploaded with this application.

b. Resource Availability:

Given the limited scope of this project, On With Life does not anticipate this project to have a significant impact on resource availability, including staffing, management, or other resources.

c. Organizational Relationships:

On With Life maintains training relationships with local nursing schools and is currently negotiating a relationship with DMACC related to respiratory therapy. In addition, On With Life trains graduate level occupational therapy (OT), physical therapy (PT), and speech therapy students from Drake University, Des Moines University, and other schools from across the nation.

6. Project Planning

a. Project Timeline:

On With Life expects the necessary construction to take about six months. On With Life plans to complete the project and place the two new beds into service in the fall of 2026.

b. Innovative Components:

On With Life works closely with hospitals and other health care providers from across Iowa to provide access to care for individuals with highly complex brain injuries and other neurological injuries. There are no other providers in Iowa that provide the care and services needed for this extremely complex and unique population.

c. Regulatory Compliance:

On With Life operates its current 28-bed nursing facility in compliance with the requirements applicable to nursing facilities imposed by the Iowa Department of Inspections, Appeals, and Licensing ("DIAL") and the Centers for Medicare and Medicaid Services ("CMS").

7. Special Criteria for Specific Services:

a. Alternative Consideration (10A.714(2)(a)):

On With Life's Ankeny campus consistently operates at or near capacity. Given the unique nature of the services On With Life provides, there are no alternatives to the proposed project that would meet the needs of the persons served at On With Life.

b. Utilization of Similar Facilities (10A.714(2)(b)):

As discussed throughout this application, On With Life is a unique facility in terms of the persons it serves. There are no similar providers in Iowa.

c. Construction/Modernization (10A.714(2)(c)):

The proposed project will involve a limited amount of construction to remodel existing space at On With Life's Ankeny campus. On With Life has concluded this is the most efficient way to meet the needs of persons served at On With Life.

d. Access Concerns (10A.714(2)(d)):

As discussed throughout this application, On With Life is a unique facility in terms of the persons it serves. There are no similar providers in Iowa. Without the proposed project, individuals with highly complex brain injuries and other neurological injuries may lack access to these critical services.

e. UIHC Special Role (10A.714(3)):

N/A

Signature

A handwritten signature in black ink that reads "Jean Shelton". The script is fluid and cursive, with the first letter of each name being capitalized and prominent.

Additional Supporting Documents Upload