



Health and Human Services

2027 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 135.63, as needed, to complete the application. 4. Upload additional documentation, as needed.

Primary Contact

Mr. Pat Stillwell

Primary Contact Employer

On With Life Extended Services, Ltd.

Primary Contact Email

pat.stilwill@onwithlife.org

Facility Name

On With Life Long Term Care

Facility Type

Nursing Facility

Facility Address

1002 W Washington Avenue, Polk City, Iowa 50226

Project Title

Polk City 25-Bed Expansion Project

Proposed Project

On With Life Extended Services, Ltd. seeks to meet the complex and very specialized need for individuals who have experienced a brain injury by adding 25 nursing facility beds to its existing 40-bed skilled nursing facility in Polk City.

Total Project Cost

9,300,000

Equipment Cost

1,008,800

Project Type

Change in bed capacity

Is this project application for a Nursing Facility?

Yes

Is there a need for Nursing Facility beds in your county, according to the Bed Need Formula?

Yes

Project Start Date

4/1/2027

Project End Date

5/1/2028

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 Extended Services, Ltd. (an affiliate of On With Life, Inc.) 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.

In 2025, On With Life received a Certificate of Need (CON) to add two (2) nursing facility beds to its 28-bed free-standing nursing facility located on its Ankeny Campus. In addition to helping to fill the complex and very specialized need of persons served at the Ankeny Campus, that small addition allowed On With Life to serve more persons at its Polk City Campus in relatively short order. In order to meet the long-term needs for these services, however, On With Life needs to expand the capacity of its Polk City campus.

On With Life's Polk City campus currently consists of a 40-bed skilled nursing facility. This facility serves individuals who have experienced a brain injury (including traumatic brain injury, stroke, tumor, aneurysm or anoxia, or other neurological disorder) and who need long-term care related to the complexity of their medical and life-long care needs. The individuals served in this program have very high-level medical and rehabilitation needs that cannot be met in traditional skilled nursing facilities. The medical acuity of those served in this program are almost double that of all other skilled nursing facilities in the State of Iowa.

In order to meet the growing need for placement options for this population and unique level of care in Iowa, On With Life is applying for a CON to add 25 nursing facility beds to its existing 40-bed skilled nursing facility in Polk City.

b. Relationship to Long-Range Development Plan:

This project is "Phase 2" of On With Life's long-range development plan. "Phase 1" of the plan involved adding two (2) nursing facility beds at On With Life's Ankeny campus. In December 2025, On With Life received a CON for that project and the required renovations are currently underway. In order to minimize disruptions to persons served, On With Life must complete Phase 1 before commencing construction of Phase 2.

"Phase 2" of the plan, as outlined in this application, involves constructing an addition on the Polk City campus to ensure long-term sustainability and to accommodate individuals requiring ventilator support. The proposed addition would offer 25 new beds and would be designed to meet the highly complex medical needs of this population.

c. Description of Proposed Service/Program:

On With Life seeks to add 25 nursing facility beds to its 40-bed free-standing nursing facility located on its Polk City Campus. A floor plan of the proposed project has been uploaded with this application as "Floor Plan – On With Life Polk City Expansion." A diagram illustrating the location of the proposed addition on the Polk City Campus has been uploaded with this application as "Site Plan – On With Life Polk City Expansion."

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.

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

State infrastructure funding FY 2026 and FY 2027: \$8,000,000

Fundraising via the On With Life Foundation: \$1,300,000

Current # of Beds (if changing)

40

Current bed type (if changing)

Nursing Facility

Requested # of Beds (if changing)

25

Requested bed type (if changing)

Nursing Facility

Document Upload

CON Bed Utilization Statistics - On With Life.pdf

Floor Plan - On With Life Polk City Expansion.pdf

Site Plan - On With Life Polk City Expansion.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 Polk City and Ankeny.

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 Polk City Campus as a five-star facility meaning its overall rating is much above average.

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 Polk City campus as a five-star facility meaning its overall rating is much above average.

c. Alternatives Analysis:

On With Life's Polk City nursing facility is a one-of-a-kind facility in the state of Iowa. In the absence of the proposed project, persons served will need to leave the state for this level of care. As a result, On With Life has concluded there is not a less costly or more effective alternative to the proposed project.

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 Polk City and a letter of support from Polk County Supervisor Jill Altringer.

Document Upload (if needed)

Letter of Support - ChildServe (08-10-26).pdf

Letter of Support -City of Polk City (08-02-26).pdf

Letter of Support - Jill Altringer (08-07-26).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 a one-of-a-kind facility in Iowa. The proposed 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's Polk City campus has been a welcome addition to the Polk City community since it opened in 2024. Prior to On With Life's purchase of the facility in 2023, the facility had been removed from service and had fallen into disrepair. On With Life invested more than \$12 million in the facility to create a modern, homelike environment for persons served in Polk City. This was not only a benefit for On With Life's persons served, but it also revitalized the facility for the community and provided valuable employment opportunities. On With Life is now proposing to add 25 nursing facility beds to campus, which will create additional employment opportunities for highly skilled personnel in the community thereby supporting the local economy.

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 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:

Financial projections have been uploaded with this application with the file name "3-Year Budget Projections – On With Life.pdf." In addition, an analysis of the costs on a per-day basis has been uploaded with this application with the file name "Daily Cost Analysis – On With Life.pdf."

Document Upload (3-year budget projections)

3-Year Budget Projections - On With Life.pdf

Daily Cost Analysis - On With Life.pdf

On With Life Staffing Plan.pdf

On With Life Staff Training Plan.pdf

On With Life Equipment Plan.pdf

b. Staffing and Operations:

A detailed summary of On With Life's staffing plan for this project has been uploaded with this application with the file name "On With Life Staffing Plan.pdf."

A detailed summary of On With Life's staff training plan for this project as been uploaded with this application with the file name "On With Life Staff Training Plan.pdf."

A detailed list of resources required for this project has been uploaded with this application with the file name "On With Life Equipment Plan.pdf."

c. Short and Long-term Viability:

Polk City currently is full with a waiting list. Projections for young adults aging out of ChildServe will total 20 by 2032. Additional demand is coming from the general community mostly via parents who are aging and need long-term placement for their medically complex children. Out-of-state placement for Iowans averages over 115 at any given time per Iowa Medicaid Out-of-State Placement reports.

The following sets forth the waitlist for 2025 for On With Life (Polk City):

Jan-Mar 2025 = 33

Apr-June 2025 = 33

July-Sept 2025 = 30

Oct-Dec 2025 = 38

Average number of people on the waitlist for 2025: 33.5

5. Community and Economic Impact

a. Community Engagement:

On With Life is very engaged in the communities in which it operates its facilities—including Polk City and Ankeny. 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 Polk City (Steve Karsjen) and the City Manager of Polk City (Chelsea Huisman), wrote a letter of support for this project. Polk County Supervisor Jill Altringer also wrote a letter of support for the project. Those letters of support have been uploaded with this application.

b. Resource Availability:

On With Life has developed a comprehensive staffing plan including:

FTE Estimates

Recruiting Needs

Training Support

Educational Relationships/Scholarships/Sponsorships

Retention Goals

Onboarding Support

Community Engagement

For additional detail, please refer to On With Life's staffing plan for this project, which has been uploaded with this application with the file name "On With Life Staffing Plan.pdf."

c. Organizational Relationships:

On With Life maintains training relationships with local nursing schools and is currently discussing 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:

09/15/2026: Complete schematic design

11/20/2026: Complete design development

02/25/2027: Complete construction documents

04/12/2027: Complete bidding and approve construction contract

04/19/2027: Start construction

05/19/2028: Complete construction

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 40-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 (135.63(2)"a"):

On With Life's Polk City nursing facility is a one-of-a-kind facility in the state of Iowa. In the absence of the proposed project, persons served will need to leave the state for this level of care. As a result, On With Life has concluded there is not a less costly or more effective alternative to the proposed project.

b. Utilization of Similar Facilities (135.63(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 (135.63(2)"c"):

The proposed project will involve the construction of an additional wing on land that On With Life already owns. 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 (135.63(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 (135.63(3)):

Not applicable.

Signature

A handwritten signature in black ink that reads "Jean Shelton". The script is cursive and elegant, with the first letter of each word being capitalized and larger than the others.

Additional Supporting Documents Upload