

Privatization of County-Owned Nursing Facilities is Not Good for Residents, Staff, and States

In a May 1, 1998 report entitled "Nursing Home Privatization: What Is the Human Cost?" the Pennsylvania-based Keystone Research Center found that privatization of seven county-owned nursing facilities in Pennsylvania, or even the attempted privatization of those facilities, led to reductions in staffing, shortages of medical and resident care supplies, and reduced quality of care for residents. The arguments made in support of privatization – that county facilities cost too much money and that turning public facilities over to private, usually for-profit entities can save money while preserving or improving nursing home quality – are not realized. To the contrary, private for-profit owners typically drastically cut staffing, leading to dramatic declines in quality of care for residents. Often, the private owners reap large profits. Despite these results, privatization continues, in Pennsylvania and other states, with the same arguments in favor of privatization and the same negative outcomes for residents and staff.

A recent example is a county-owned facility in Beaver County, Pennsylvania, now called Brighton Rehabilitation and Wellness Center. As discussed more fully below, once the facility was sold to private owners in 2013, the new owners changed both the facility's admissions practices (reducing its less profitable Medicaid census) and its staffing practices (substantially reducing staffing levels). It also increased profits for its owners through related-party transactions, paying the owners' companies increasingly high rents and management fees. During the coronavirus pandemic, hundreds of residents and staff members became infected with COVID-19 and many died. The facility was identified as one of the worst-performing facilities in the country, becoming a candidate for the Special Focus Facility (SFF)² program in February 2018 and an SFF in 2021. During the coronavirus pandemic, the state appointed a temporary manager at Brighton, federal and state investigators executed search warrants at the facility, and the state Attorney General confirmed an ongoing criminal investigation at the facility.

Although not all counties own and operate nursing facilities, the National Association of Counties reported in June 2020 that, nationwide, counties own and operate 449 nursing facilities and directly support 758 facilities.³ This report discusses the sales of county facilities in Pennsylvania, Illinois, and New York to private owners.

1. Friendship Ridge, now Brighton Rehabilitation and Wellness Center

In 2013, Beaver County (Pennsylvania) considered selling a county-owned facility, Friendship Ridge, to private owners.⁴ Although the 589-bed facility generated about \$53 million in revenue, County Commissioners said they expected to lose at least \$5 million in 2013, in part because of unfunded pension liabilities.

Opposing privatization, Matthew Yarnell, vice president of Service Employees International Union Healthcare PA (SEIU), argued that the facility's operating philosophy would shift from providing care to making a profit. He pointed to the poor outcomes in nursing facilities in other



Pennsylvania counties following privatization – staffing, supplies, and services were cut, reducing the quality of care for residents, and staff lost county health care benefits. Supporters of privatization argued that investigating the history of potential buyers could avoid negative outcomes and that Friendship Ridge could be sold at an estimated price of \$25 to \$32 million.

In November 2013, Beaver County sold Friendship Village to Comprehensive Healthcare Management Services LLC of New Jersey (Comprehensive) for \$37.5 million, choosing the company over four other companies from which it accepted bids.⁵ The *Pittsburgh Post-Gazette* reported that SEIU and the *Beaver County Times* expressed concerns that more information had not been made available about the purchase. As described by the newspaper, County Commissioners said, describing a need for secrecy, that "the negotiations were difficult and making them public could have threatened the deal."

The sale was completed in March 2014. The New Jersey company that purchased the county facility described positive – plans to update the lobby and common areas, add 60 beds, create private and semi-private rooms, and add a new rehabilitation complex – as well as plans to "conduct departmental reviews of resident care, safety and organizational staffing and services," and possibly cut, temporarily, 35 full-time and 15 part-time jobs.⁶

A 2016 forensic audit into the sale of Friendship Ridge, now renamed Brighton, to Comprehensive Healthcare Management Services, revealed that the county was owed more money. Comprehensive's principal Ephraim Lahasky disputed the audit findings.⁷

A. How did the county nursing home change following the sale to for-profit private owners?

When Friendship Ridge was owned by Beaver County, the 589-bed building, with 90% and above occupancy, largely served a Medicaid population – 84-89% of the residents relied on Medicaid. When Comprehensive bought the facility, it reduced the Medicaid census by 100 residents – the Medicaid census declined from 455 residents in 2010 to 358 residents in 2016. Instead of Medicaid, Comprehensive focused on the higher-paying Medicare program. Medicare revenues at the facility increased from \$1 million a year in 2014, when the County owned the facility, to \$8.6 million in 2018, after Comprehensive bought the facility. While the facility's overall occupancy declined to less than 80%, annual profits doubled, from \$4.1 million in 2014 to \$8.2 million in 2015.

The *Pittsburgh Post-Gazette* reports that "Comprehensive has found other ways to make money off of Brighton, too." The Comprehensive company that manages the nursing facility pays rent to another Comprehensive company that owns the building. Rent increased from \$3.9 million in 2014 to \$6.8 million in 2019. In addition, "Comprehensive pays itself a 'management fee' that has averaged \$1.2 million a year." Profits rose to a high of nearly \$8 million in 2019, while the facility lost money on day-to-day expenses.



The Pittsburgh Post-Gazette reported in August 2020 that Brighton Rehabilitation

- had been cited with serious infection control, management and patient care deficiencies for the three years of inspection reports the reporters reviewed
- had been on the candidate list for Special Focus Facility¹⁰ for 30 months (that is, since February 2018)
- administered hydroxychloroquine to 205 of 435 residents, without approval from the state health department
- provided 40% to 50% less staff time than other facilities in Pennsylvania 11

B. How did Brighton Rehab fare during the coronavirus pandemic?

Brighton's record of poor care continued during the pandemic. As of April 30, 2020, 50 people at the facility had died of COVID-19. 12

A state survey conducted May 1-5, 2020 cited immediate jeopardy and "more than four dozen violations related to improper infection control, insufficient staffing training and ineffective management." The state cited jeopardy on May 2, but lifted jeopardy on May 5, when it determined that the facility was implementing its corrective plan.

On May 11, 2020, the state appointed a temporary manager, New Jersey-based Allaire Health Services, to oversee the facility. Pennsylvania National Guard troops also spent a week at the facility "to help with cleaning and assist with patient care." ¹⁴

Then-HHS Secretary Alex Azar announced what he described as a "rare' move," a federal inspection, in order to conduct an independent review of Brighton during the week on May 12, 2020. Secretary Azar said, "there's not an excuse for an infection spreading like wildfire throughout a nursing facility." While noting that some large chains in the region have not had any COVID cases at all, he concluded,

"We have found generally across the country that nursing homes that have had past fines for patient quality care and safety, who are lower rated in terms of the safety measures, that those are also more likely to be institutions where you will have inadequate infection control, and as a result cause infections, outbreaks of covid and fatalities of our seniors."

At that time, the facilities had the most coronavirus cases and deaths of any facility in Pennsylvania – 368 residents and 31 staff members.

As of June 10, 2020, the facility had at least 332 cases of COVID-19 among its 334 residents and 108 cases among its employees, according to state records. ¹⁶



In August 2020, Pennsylvania Attorney General Josh Shapiro confirmed that his office had launched a criminal investigation into the facility, although he did not provide details. ¹⁷ At least 73 residents had died of COVID-19 since March 2020.

On August 31, 2020, federal agents executed search warrants at Brighton and a second Comprehensive Healthcare facility purchased from Golden Living, Mt. Lebanon Rehabilitation and Wellness Center. U.S. Attorney Scott Brady said that agents from the FBI, the Office of Inspector General, the IRS-Criminal Investigation, and the Pennsylvania Attorney General were executing warrants.¹⁸

Ten families whose relatives died at Brighton and five families whose relatives still live at Brighton sued the nursing facility, charging it with "reckless' handling of the covid-19 outbreak, which has killed at least 73 residents of the Beaver County facility." The families do not blame staff for the cases and deaths, recognizing that staff "were placed in the untenable position of having to care for hundreds of residents through a pandemic while being untrained, unsupervised, understaffed and unsupported by Brighton." As of October 2020, at least 334 residents, of more than 400 living in the facility, had been infected with COVID-19.

As of October 5, 2021, Brighton Rehabilitation and Wellness Center is one of 88 Special Focus Facilities in the country. ²⁰ It had been an SFF for a year, as of the September 29, 2021 list, and was identified as a facility that had not improved.

The facility had lower nurse staffing levels for all levels of nursing:

Nurse staffing levels, staff minutes and hours per resident per day

Category of nurse	Brighton	Pennsylvania	National average
		average	
Registered nurse	31 minutes	55 minutes	46 minutes
Licensed practical	43 minutes	56 minutes	58 minutes
nurse/licensed			
vocational nurse			
Total license nurse	1 hour	1 hour	1 hour
staff hours	14 minutes	51 minutes	43 minutes
Nurse aide	2 hours	2 hours	2 hours
	2 minutes	10 minutes	22 minutes

2. Privatization of public facilities in Pennsylvania and other states

Pennsylvania has many county nursing facilities that have been bought by private companies.



Pleasant Acres Rehabilitation and Nursing Center was owned by York County until its sale to private investors in October 2018, despite a 2018 analysis by *York Dispatch* finding that the 15 nursing homes sold by counties in 2005 had "an average overall rating of 1.9 stars," compared to 21 nursing homes still owned by counties that had "an average overall rating of 3.1 stars" and despite more than 100 residents' raising objections at a public town hall meeting. Pleasant Acres had a one-star overall rating on *Care Compare*.

The facility was a Special Focus Facility for eight months before it "graduated," according to CMS's listing on September 29, 2021. Nevertheless, as of October 6, 2021, Pleasant Acres has one star in health inspections, two stars in staffing, and two stars in quality measures. Its overall rating is one star. *Care Compare* also indicates that since July 2018, the facility has had four civil money penalties imposed, totaling \$103,669.

In June 2020, 41 residents and seven staff members had tested positive for COVID-19 and two residents had died.²²

A. Illinois

Champaign County, Illinois approved the sale of its county nursing home, Champaign County Nursing Home, in May 2018 for \$11 million to Extended Care Clinical, LLC and Altitude Health Services, Inc., companies controlled by William Avi Rothner. However, paperwork filed with Illinois state agencies during the summer 2018 substituted, as the purchasers, two newly-formed companies, University Rehabilitation Center of CU, LLC and University Rehab Real Estate, LLC. The new companies, which listed Rothner and Atied Associates as the owners, reflected the new name that was planned for the county facility once the sale was completed, University Rehabilitation Center. Objections were raised about the quality of care provided in other facilities operated by Rothner or Atied. Claudia Lennhoff with Champaign County Healthcare Consumers (CCHCC) reported that 80% of the nursing facilities in other states operated by Atied "have below average or much below average staffing." 23

Research conducted by CCHCC and made available to the community on May 21, 2018²⁴ documented poor care in facilities operated by Rothner and his father Eric Rothner in Illinois and other states, including 86 cases of sexual violence at a Chicago nursing facility reported in 2010; multiple articles in the *Chicago Tribune* about governments' closures of Rothners' nursing facilities; *The Chicago Reporter's* identifying the Rothners as owners of four of the top worst nursing facilities in Illinois in 2009; Medicare and Medicaid payments denied by the government in 2016 to a county-owned facility in Arizona, which had been sold to Rothner in 2012; Medicare and Medicaid payments denied at Wisconsin nursing facility in 2016; and many more specific examples.²⁵

On October 22, 2018, CCHCC submitted objections to the Illinois Health Facilities and Services Review Board, opposing the sale of the county nursing home and asking the Review Board to



postpone its decision until the completion of additional investigation and research. Among its findings, CCHCC reported²⁶:

1. Applicants Rothner and Altitude Health Services, Inc.'s answer to the Review Board staff's inquiry about any adverse actions taken against Applicants or any facilities owned or operated by Applicants did not provide accurate information. A certification signed by Rothner on August 15, 2018 indicated that no action had been taken against University Rehabilitation Center of CU, LLC and University Rehab Real Estate, LLC. CCHCC points out that these companies did not exist (they were not created until August 17, 2018) so that it would have been impossible for any adverse actions to have been taken against them.

In fact, as CCHCC reported, multiple facilities owned by Rothner and Altitude Health Services, Inc. in Illinois had many adverse actions filed against them.

2. Applicants would be expected to change staffing levels. More than half of 16 Illinois nursing homes owned by Extended Care Clinical, LLC, a Rothner company, had below average or much below average ratings; 14 of 18 facilities in Illinois owned by Atied Associated, LLC had below average or much below average staffing levels.

CCHCC held a press conference on October 29, 2018 to express its objection to the sale of the county nursing home. It described Altitude Acquisitions, formed in June 2018, as a "'placeholder' company that will 'go away'" and be replaced by University Rehabilitation Center of CU, LLC and University Rehab Real Estate, LLC, two companies that were created in August 2018 and were co-owned by Rothner and Atied Associates.²⁷

Despite the objections and confirming data, Champaign County sold the nursing facility to Rothner. He took over the facility on April 3, 2019, committing to continuing to provide care to all residents who had a "'qualified payor source'" and agreeing to operate the facility as a nursing facility or assisted living facility until 2028.²⁸

As of October 5, 2021, University Rehabilitation Center is a Special Focus Facility²⁹ and had been an SFF for three months. Between September 1, 2020 and August 31, 2021, according to the federal website *Care Compare*, the facility had 16 complaint investigations, which, along with the standard survey on May 6, 2021, cited 86 deficiencies (compared to the statewide average of 10 deficiencies and the national average of 8.3 deficiencies) including

- Eight actual harm deficiencies
 - o Pressure ulcers, May 6, 2021; April 8, 2021; March 11, 2021
 - o Accident hazards/supervision, May 6, 2021, December 5, 2020
 - o Nurse staffing, April 8, 2021
 - o Transfer/discharge, February 18, 2021, December 15, 2020
- Two immediate jeopardy deficiencies



- o Appropriate treatment of resident with dementia, January 27, 2021
- o Infection control, October 13, 2020

The federal website does not report nurse staffing information for the facility because "This facility did not submit staffing data, or submitted data that did not meet the criteria required to calculate a staffing measure." The facility's resident and staff vaccination rates are also not reported on *Care Compare*.

In addition to Champaign County Nursing Home (renamed University Rehab Center), the Rothner family bought two additional Champaign County nursing facilities – Helia Healthcare of Champaign (renamed Champaign Rehab Center) and Heartland of Champaign (renamed Champaign Living Center). Less than four months after buying Heartland of Champaign, in December 2018, Rothner filed a notice with the state in April 2019 of his intent to close the facility.³⁰ The 45 residents remaining in the 102-bed facility needed to find new facilities.

B. New York

After a years-long process, Essex County planned to sell its 182-year-old county nursing home, Horace Nye Nursing Home, to Bronx, New York-based Centers for Specialty Care (CSC)³¹ in 2012. Although the county attorney would not make the contract public, "for confidentiality reasons," he sought to dispel concerns that Medicaid residents would be evicted in favor of Medicare and private-pay residents and that union employees would lose their jobs.³²

The Essex County Board of Supervisors voted to sell the facility to CSC for \$4,050,000 at its June 5, 2013 meeting. The sale took place in mid-2014.

In September 2020, the facility, now named Essex Center for Rehabilitation and Healthcare, had 107 COVID-19 cases – 60 residents, 35 staff members, and 12 contacts of staff.³³ By October 2, the facility was described as "at the center of a COVID-19 outbreak, with dozens testing positive."³⁴

As of October 15, 2021, Essex Center is a one-star facility on *Care Compare*. It has one star in health inspections, two stars in staffing, and two stars in quality measures. Its overall rating is one star.

Conclusion

The 1998 report by the Keystone Research Center documented the declines in staffing levels and medical and patient care supplies when facilities were privatized.³⁵ A study 10 years later found that privatization increased regulatory violations and decreased quality of care and quality of life for residents.³⁶



Repeated examples document that when counties sell public nursing homes to private owners, quality of care for residents frequently declines. Selling public nursing facilities to for-profit companies helps neither residents nor staff.

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¹ Keystone Research Center, "Nursing Home Privatization: What Is the Human Cost?" (May 1, 1998), https://www.keystoneresearch.org/sites/default/files/krc_nursing_home_priv.pdf

² The Special Focus Facility program identifies nursing facilities that have more problems than other facilities, more serious problems than other facilities, and a pattern of serious problems over a long period of time (three years). They have additional standard surveys each year and "progressive enforcement." The Centers for Medicare & Medicaid Services names 88 facilities at a time as SFFs and identifies another 400+ "candidate" facilities that meet the criteria for the program. https://www.cms.gov/Medicare/Provider-Enrollment-and-CertificationandComplianc/Downloads/SFFList.pdf

³ National Association of Counties, *NACo Brief: Nursing Homes & Covid-19*, p. 3 (Jun. 2020), https://www.naco.org/sites/default/files/documents/Nursing%20Homes%20and%20COVID-19_v5_06.19.20.pdf
⁴ J.D. Prose, "Friendship Ridge holds on as more counties sell nursing homes," *The Times* (Feb. 23, 2013), https://www.timesonline.com/article/20130223/News/302239859

⁵ Torsten Ove, "Beaver commissioners sell county nursing home to private New Jersey company," *Pittsburgh Post-Gazette* (Nov. 21, 2013), https://www.post-gazette.com/local/2013/11/21/Beaver-commissioners-sell-county-nursing-home-to-private-New-jersey-company/stories/201311210327

⁶ Sam Spatter, "Beaver Nursing Home Sale Finalized," *Pittsburgh Tribune-Review* (Mar. 27, 2014), https://bexar.tx.networkofcare.org/aging/news-article-detail.aspx?id=50909

⁷ Tom Davidson, "Beaver County Commissioners 'digesting' Friendship Ridge audit as new owner disputes potential findings," *Ellwood City Ledger* (Oct. 5, 2016), https://www.ellwoodcityledger.com/article/20161005/news/310059984

⁸ Sean D. Hamill, "Brighton's Plight: A New Business Model (Part 4)," *Pittsburgh Post-Gazette* (Nov. 19, 2020), https://newsinteractive.post-gazette.com/brighton/part4-new-business-model.php

⁹ Sean D. Hamill, "Brighton's Plight: A New Business Model (Part 4)," *Pittsburgh Post-Gazette* (Nov. 19, 2020), https://newsinteractive.post-gazette.com/brighton/part4-new-business-model.php

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¹¹ Jamie Martines and Natasha Lindstrom, "'I Don't Want to Die Here,' A Coronavirus outbreak at Brighton Rehab turned into one of the nation's worst, but problems at the nursing home started well before the pandemic," *Pittsburgh Tribune-Review* (Aug. 9, 2020), https://triblive.com/news/problems-at-brighton-rehab-didnt-start-with-coronavirus-trib-investigation-finds/

¹² Jamie Martines and Natasha Lindstrom, "'I Don't Want to Die Here,' A Coronavirus outbreak at Brighton Rehab turned into one of the nation's worst, but problems at the nursing home started well before the pandemic," *Pittsburgh Tribune-Review* (Aug. 9, 2020), https://triblive.com/news/problems-at-brighton-rehab-didnt-start-with-coronavirus-trib-investigation-finds/

¹³ Natasha Lindstrom, "Brighton nursing home put majority of residents in 'immediate jeopardy' amid covid-19 outbreak, state survey says," *Pittsburgh Tribune-Review* (Jun. 19, 2020), https://triblive.com/local/regional/brighton-nursing-home-put-majority-of-residents-in-immediate-jeopardy-amid-covid-19-outbreak-state-survey-says/



- ¹⁴ *Id.* Jamie Martines and Natasha Lindstrom, "'I Don't Want to Die Here,' A Coronavirus outbreak at Brighton Rehab turned into one of the nation's worst, but problems at the nursing home started well before the pandemic," *Pittsburgh Tribune-Review* (Aug. 9, 2020), https://triblive.com/news/problems-at-brighton-rehab-didnt-start-with-coronavirus-trib-investigation-finds/
- ¹⁵ Natasha Lindstrom, "U.S. Health Secretary says feds investigating Brighton nursing home coronavirus outbreak," *Pittsburgh Tribune-Review* (May 29, 2020), https://triblive.com/local/regional/u-s-health-secretary-says-feds-investigating-brighton-nursing-home-coronavirus-outbreak/
- ¹⁶ Natasha Lindstrom, "Brighton nursing home put majority of residents in 'immediate jeopardy' amid covid-19 outbreak, state survey says," Pittsburgh Tribune-Review (Jun. 19, 2020), https://triblive.com/local/regional/brighton-nursing-home-put-majority-of-residents-in-immediate-jeopardy-amid-covid-19-outbreak-state-survey-says/
- ¹⁷ Natasha Lindstrom, "AG Shapiro confirms investigation into embattled Brighton Rehab nursing home in Beaver County," *Pittsburgh Tribune-Review* (Aug. 12, 2020), https://triblive.com/local/regional/ag-shapiro-confirms-investigation-into-embattled-brighton-rehab-nursing-home-in-beaver-county/
- ¹⁸ Torsten Ove and Sean D. Hamill, "Federal agents execute search warrants at Brighton Rehabilitation, Mt. Lebanon site," *Pittsburgh Post-Gazette* (Sep. 3, 2020), https://www.post-gazette.com/news/health/2020/09/03/Federal-agents-execute-warrants-Brighton-Rehabilitation-Mt-Lebanon-Rehab-pandemic/stories/202009030126
- ¹⁹ Natasha Lindstrom and Teghan Simonton, "Brighton Rehab sued by 15 families, residents for 'reckless' response to covid outbreak," *Pittsburgh Tribune-Review* (Oct. 21, 2020), https://triblive.com/local/regional/brighton-rehabsued-by-15-families-residents-for-reckless-response-to-covid-outbreak/
- ²⁰ A Special Focus Facility
- ²¹ David Weissman, "Results mixed for other counties that sold nursing homes," *York Dispatch* (Feb. 28, 2018), https://www.yorkdispatch.com/story/news/local/2018/02/26/results-mixed-other-counties-sold-nursing-homes/359397002/
- ²² Candy Woodall, "York County nursing home has big COVID-19 outbreak 48 cases since May 25," *York Daily Record* (Jun. 14, 2020), https://www.ydr.com/story/news/2020/06/12/coronavirus-pa-york-county-nursing-home-has-covid-19-outbreak/3179543001/
- ²³ Jim Meadows, "Watchdog Group Says Applicant To Buy County Nursing Home Switched Companies," willradio.tv.online (NPR) (Oct. 29, 2018), https://will.illinois.edu/news/story/watchdog-group-says-applicant-to-buy-county-nursing-home-switched-companies
- ²⁴ CCHCC, "Research on bidder for Champaign County Nursing" (May 21, 2018), https://www.healthcareconsumers.org/research-on-bidder-for-champaign-county-nursing-home/
- ²⁵ See also Dan Hinkel, "A family with a wide reach in Illinois nursing homes has links to severe COVID-19 outbreak in New Jersey," *Chicago Tribune* (May 7, 2020), https://www.chicagotribune.com/coronavirus/ct-coronavirus-nursing-homes-rothner-20200507-72hcw27efjafjmkvlapemivq6i-story.html
- ²⁶ Letter to Vice Chair Richard Sewell, Illinois Health Facilities and Services Review Board, from CCHC re Project Number 18-026 Champaign County Nursing Home, Urbana (Oct. 22, 2018), https://www2.illinois.gov/sites/hfsrb/Projects/ProjectDocuments/2018/18-026/2018-10-22%2018-036%20Response%20to%20SAR.pdf
- ²⁷ Champaign County Health Care Consumers, "Sale of Champaign County Nursing Home but who will really own it?" (Oct. 30, 2018), https://www.healthcareconsumers.org/sale-of-champaign-county-nursing-home-but-who-will-really-own-it/
- ²⁸ Jim Meadows, "Champaign County Nursing Home Sale Finalized," willradio.tv.online (NPR) (Apr. 3, 2019), https://will.illinois.edu/news/story/champaign-county-nursing-home-sale-finalized
- ²⁹ A Special Focus Facility is
- ³⁰ Debra Pressey, "4 months after buying Campustown nursing home, new owner set to close it," *News-Gazette* (Apr. 18, 2019, updated Jun. 21, 2019), https://www.news-gazette.com/news/4-months-after-buying-campustown-nursing-home-new-owner-set-to-close-it/article_b68efcf9-3f9f-5f91-a5c3-fd1030f0d8ce.html
- 31 https://centershealthcare.com/
- ³² "From Horace Nye to Essex Home for Rehabilitation and Healthcare," *The Sun* (https://suncommunitynews.com/news/37229/from-horace-nye-to-essex-home-for-rehabilitation-and-healthcare/





³³ Cara Chapman, "Essex Center COVID-19 outbreak totals 107 cases," *Press-Republican* (Sep. 17, 2020), https://www.pressrepublican.com/news/coronavirus/essex-center-covid-19-outbreak-totals-107-cases/article-0e954cd9-9c8d-5074-bc62-fdb6a2fb432d.html

³⁴ "Essex Center reports three deaths in two days," *WCAX* (Oct. 2, 2020), https://www.wcax.com/2020/10/02/essex-center-reports-three-deaths-in-two-days/
³⁵ Keystone Research Center, "Nursing Home Privatization: What Is the Human Cost?" (May 1, 1998),

³⁵ Keystone Research Center, "Nursing Home Privatization: What Is the Human Cost?" (May 1, 1998), https://www.keystoneresearch.org/sites/default/files/krc_nursing_home_priv.pdf

³⁶ Anna Amirkhanyan, "Privatizing Public Nursing Homes: Examining the Effects on Quality and Access," *Public Administration Review*, Vol. 68, Issue 4, pp. 665-680 (Jun. 10, 2008), abstract at https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1540-6210.2008.00906.x