

Continuing Care Retirement Communities

Opportunities for New York's Economy and Older Adults



New York State is home to 12 not-for-profit Continuing Care Retirement Communities (CCRCs), offering independent living, assisted living and skilled nursing care on one campus. Each CCRC generates hundreds of jobs and tens of millions of dollars in economic activity to its local economy and that of the State.

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What is a Continuing Care Retirement Community?

A Continuing Care Retirement Community (CCRC) is a residential alternative for older adults (usually age 65 and older) that provides flexible housing options, a coordinated system of services and amenities, and a continuum of care that addresses the varying health and wellness needs of residents as they grow older. The emphasis of the CCRC model is to enable residents to avoid having to move – except, perhaps, to another level of care within the community – if their needs change and they require more health care and supervision.

CCRCs have been authorized to operate in New York State since 1989, when State legislation, Article 46 of the Public Health Law, was enacted to authorize the establishment of these senior living arrangements.

Within CCRCs, the independent housing options typically range from small and large apartments to townhouses and cottages. Assisted living options can include enhanced programs which allow residents to remain in that level of care longer as their needs increase, as well as special needs programs that offer memory care services. CCRC nursing homes offer short-term rehabilitation and post-acute care services, as well as long term care for residents who need access to 24-hour nursing and other services.

CCRCs are unique because they offer a full range of living arrangements for their residents – independent housing, assisted living/adult care facility and nursing home – within one community.

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BENEFITS

In addition to providing living arrangements and a range of health-related services and supports, CCRCs also provide their residents with the amenities and comforts of a community. Residents often have access to:

- health clubs;
- swimming pools;
- conference centers;
- medical suites;
- dedicated worship centers;
- convenience stores;
- beauty salons; and
- choice of dining options.

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CCRCs also host organized social events, provide recreational and educational activities and offer transportation to venues outside of the community. They may also offer guest quarters for visiting family members and friends.

COST

Residents pay an entrance fee – most often from the sale of their home – and monthly charges out of their own funds and/or from long term care insurance benefits. In exchange, they have guaranteed access to the entire range of services provided in the community. CCRCs are an attractive alternative to many seniors, since they provide security in knowing that the resident's future health care and other needs will be met by the same organization, and that their monthly fee will remain predictable even if the level of services needed changes. This allows a resident to budget for the cost over time.

TYPES OF AGREEMENTS/CONTRACTS

CCRCs provide housing and health related services for their residents under an agreement effective for the life of the resident or for a specific period. There are three main types of agreements or contracts within CCRCs. Although many communities offer more than one type of contract, not all of them do.

- “Type A” contracts, also known as "life care" agreements, include housing, residential services and amenities, and unlimited long-term care without substantial increases in residents' monthly payments.
- Modified (“Type B”) contracts cover housing, residential services and amenities, and limited nursing home care without any substantial increases in residents' monthly payments.
- Fee-for-Service (“Type C”) contracts – which were first authorized in New York in 2004 – include housing, residential services and amenities. Residents are guaranteed access to health care services by paying prevailing rates. Essentially, residents only pay for health care services used at a monthly rate that varies based on the level of service they are receiving.

The CCRC approach helps to maintain residents' independence for as long as possible by serving them in the least restrictive, most independent setting in the community appropriate to their needs.

CCRCs as Economic Drivers

CCRCs, in addition to providing quality care and multiple services on one campus, create jobs and significant economic development opportunities for local communities. In a fiscal climate that calls for encouraging increased economic development and reduced public spending, additional CCRC development in New York State would meet both important goals:

While these communities may differ in terms of size, structure, amenities and location...each CCRC annually generates between \$19 and \$72 million in economic activity within its region and directly supports between 63 and 300 jobs.

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- Residents and employees of CCRCs spend their income in the community, contributing to the economic growth of local communities and New York State. Direct expenditures within the CCRC are multiplied as these income expenditures translate into income for businesses and individuals in the community.
- Residents invest their assets and income in the community for their residential and health-related needs, which in turn obviates or significantly delays the need to rely on the State/local funded Medicaid program to cover such costs.

New York is currently home to 12 CCRCs, all of which are sponsored by Not-for-Profit (NFP) organizations. While these communities may differ in terms of size, structure, amenities and location, each of them has two economic features in common:

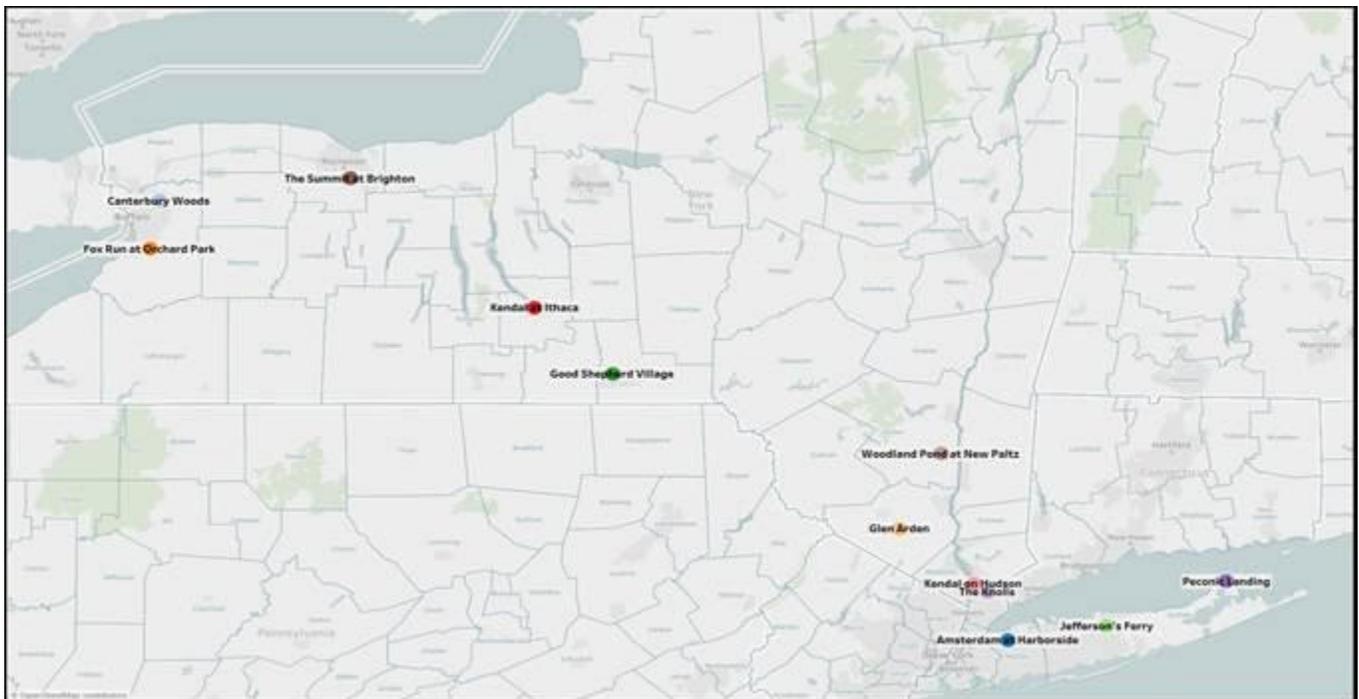
1. Based upon 2015 information, each CCRC annually generates between \$19 and \$72 million in economic activity within its region; and
2. Each CCRC directly supports between 63 and 300 jobs, and indirectly supports additional employment through secondary economic activity.

Collectively, New York's CCRCs generate nearly \$500 million in economic activity to the State each year and directly/indirectly support well over 2,000 jobs.

An Untapped Opportunity

There are 62 counties in New York State – only 9 of these counties are home to the 12 CCRCs – leaving over 85 percent of New York's counties without a single CCRC.

Exhibit 1: CCRCs in New York State



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Per the Ziegler National CCRC Listing and Profile, there are currently 1,954 CCRCs in the United States.ⁱ The majority – 79.1 percent – of CCRCs are sponsored by NFP organizations. Exhibit 2 below shows the states with the largest numbers of CCRCs:

Exhibit 2: Top 10 States for Number of CCRCs

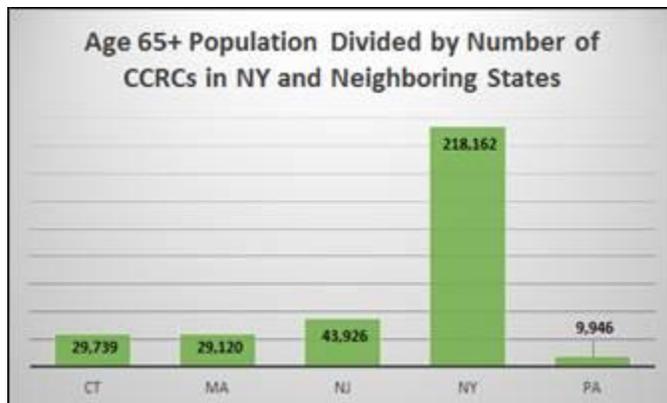
STATE	NUMBER OF CCRCs	STATE	NUMBER OF CCRCs
Pennsylvania	197	Texas	94
Ohio	150	Kansas	74
California	133	Iowa	71
Illinois	113	Indiana	67
Florida	109	North Carolina	65

Source: Ziegler National CCRC Listing

While there continues to be significant out-migration of older adults to warm weather states such as Florida and the Carolinas, older New Yorkers are also leaving the state for neighboring states such as Pennsylvania (with 197 CCRCs); New Jersey (with 27 CCRCs); and Massachusetts (with 31 CCRCs). With only 12 CCRCs scattered throughout New York State, seniors who can afford to pay for this model of care are migrating to neighboring states where CCRCs are more plentiful to access services.

The relatively small number of CCRCs in New York State in relation to the potential demand is stark when compared to these neighboring states. Exhibit 3 shows the number of seniors, aged 65+, divided by the number of CCRCs in Connecticut, Massachusetts, New Jersey, New York and Pennsylvania. As shown, there are over 200,000 New Yorkers, aged 65+, for each CCRC in the State. Compare this with Pennsylvania, which has a CCRC for about every 10,000 residents aged 65+ and the other states which have CCRCs for about every 30-40,000 aged 65+ persons.

Exhibit 3



Source: US Census Bureau, 2010 census and state CCRC data.

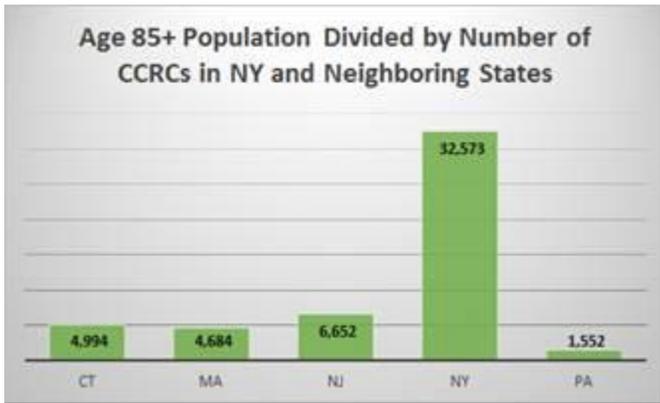
Seniors who can afford to pay for this model of care are migrating to neighboring states where CCRCs are more plentiful to access services.

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Exhibit 4 shows the same comparison for the age 85+ population. As shown, there are over 30,000 New Yorkers, aged 85+, for each CCRC in the State and only about 1,500 individuals, aged 85+ in Pennsylvania for each CCRC. The other states have a CCRC for about every 4,500-6,500 aged 85+ persons.

Exhibit 4



Source: US Census Bureau, 2010 census and state CCRC data.

The population figures suggest that New York State should have 6-7 times the number of CCRCs currently operating here.

Even excluding Pennsylvania from the above comparisons, the population figures suggest that New York State should have 6-7 times the number of CCRCs currently operating here.

Ziegler, a national full-service investment bank that specializes in CCRC financings, explained in its 2015 National CCRC Listing and Profile why there are such major differences in the number of CCRCs among states (note that the term “Life Plan Communities” is a new name for CCRCs):

“There are several reasons why a particular state may be higher or lower in their number of retirement communities. In addition to drivers such as state population and parts of the country where the concept of retirement living was founded (e.g., Philadelphia), a state’s regulatory environment has a great deal to do with the number of Life Plan Communities in existence. Some states have been much more receptive to the development of Life Plan Communities over the years, Pennsylvania for example, **while other states such as Maryland and New York, present significant barriers to new community development.** Some parts of the country also have limited land capacity for additional development or have land that is cost prohibitive for many organizations.”ⁱⁱ [**Emphasis added**]

Why aren’t more of these communities being developed in New York State? New York’s statutory and regulatory oversight of CCRC establishment and ongoing operations is burdensome, adding significant cost to establishing a community and operating it over time. State law and regulation must be revised to encourage additional development of CCRCs, while continuing to protect the interests of residents and improve the operation of the communities.

The market for CCRCs is expected to expand as baby boomers age and begin planning for their retirement, resulting in the potential for additional job creation and a brighter economic future for the State. However, without increased CCRC development, many of New York’s seniors will leave the State and spend their assets and income elsewhere.

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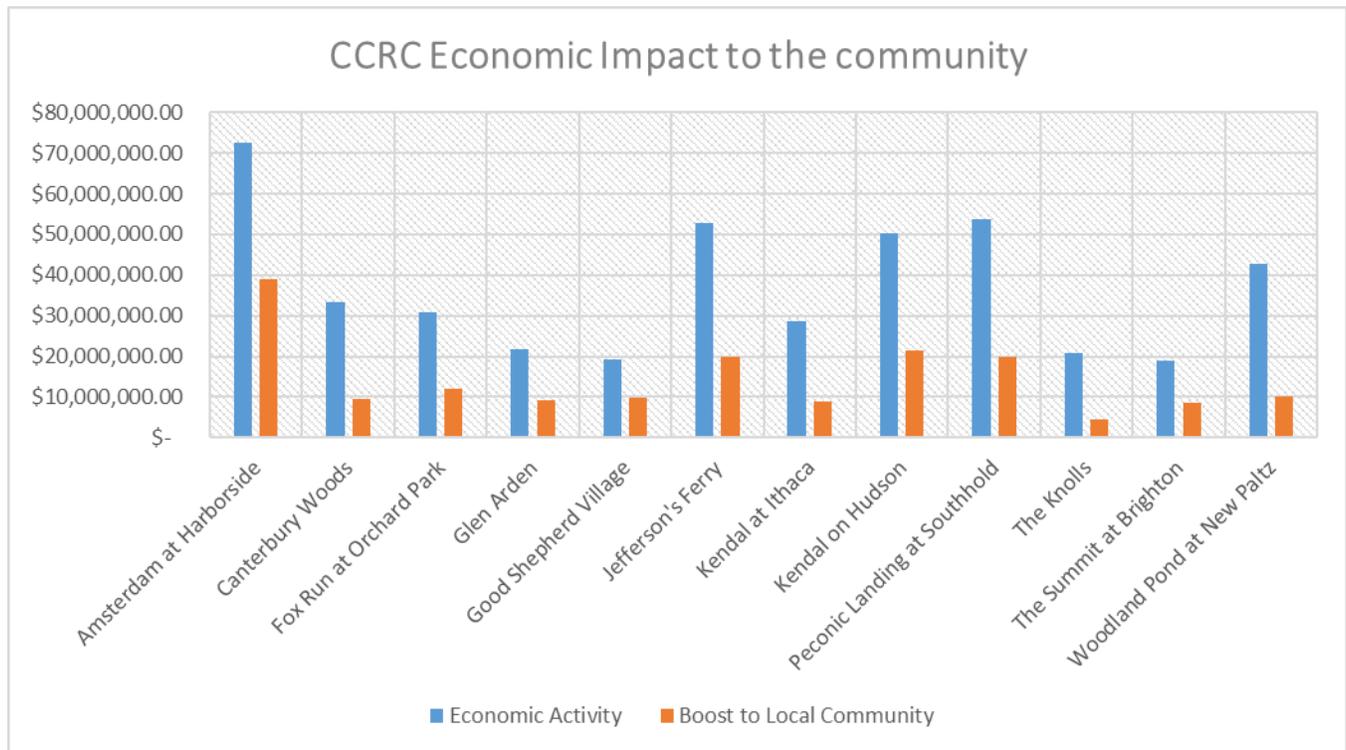
New York, bountiful in land, workforce, financial capital and creative potential, needs additional CCRCs; however, the State is falling behind and missing out on the multi-million-dollar economic development opportunities. Per Ziegler:

“Ziegler believes that there will continue to be great demand for the service and lifestyle that Life Plan Communities have to offer. Per data from the National Investment Center for Seniors Housing & Care (NIC), CCRC occupancy has rebounded to nearly pre-recession levels. Most Life Plan Community organizations continue to reinvest in their existing campuses and look to enhance offerings, whether it would be specialized memory support services or additional common areas that offer state-of-the-art wellness centers. Many Life Plan Communities, regardless of the category label over the years, have deep histories of providing for seniors. We anticipate that will continue for many more decades.”ⁱⁱⁱ

Profiling New York State CCRCs

New York's CCRCs – while few – are economic powerhouses to their local economies and to the State. As previously noted, the economic indicators cited for each community are based on reported employment and expenditure data for 2015. Exhibit 5 below identifies the economic impact generated by each of the CCRCs in New York.

Exhibit 5: Economic Impact of New York's CCRCs



With a more progressive regulatory and development environment, the CCRC model could become more widely available and affordable to New York's seniors; create thousands of good-paying

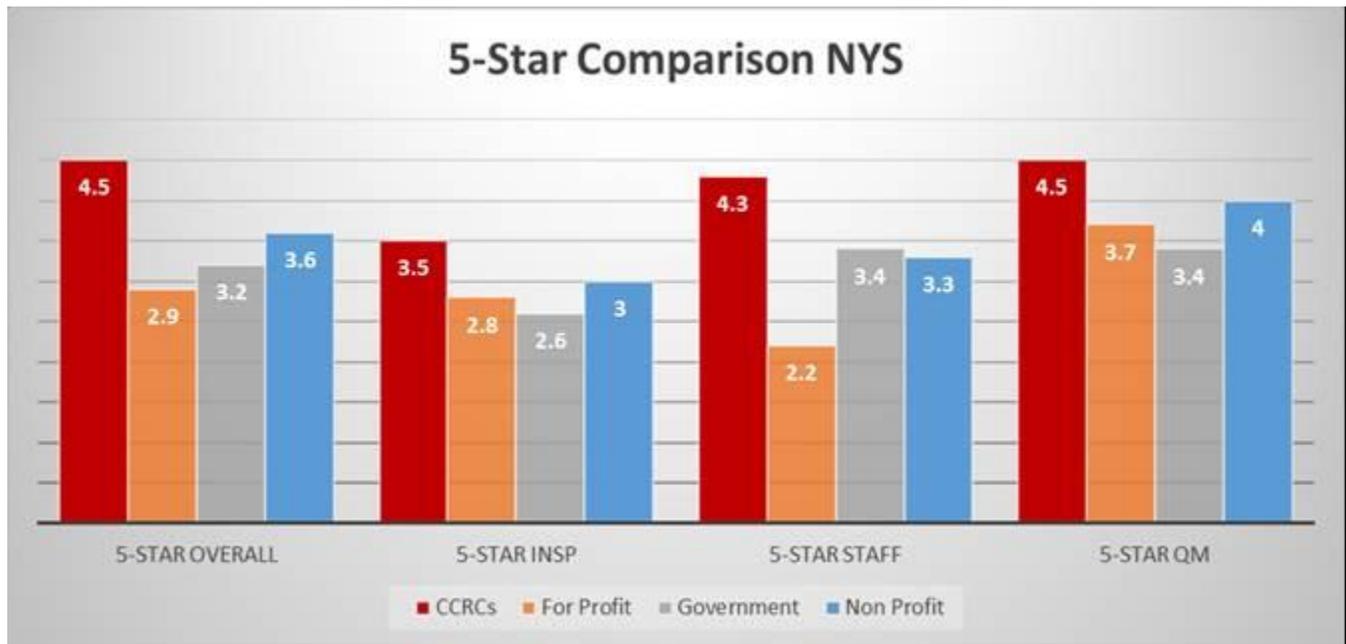
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construction and ongoing jobs; and generate millions of dollars of economic activity for the State and its local communities.

In addition to contributing to local and State economic activity, CCRCs also provide high quality services to their residents. For example, CCRC-based nursing homes score extremely well on the Centers for Medicare and Medicaid Services (CMS) 5-Star quality rating system in comparison to other types of nursing homes in New York. Exhibit 6 shows that CCRC nursing homes score higher than their peers on the composite CMS 5-star rating, as well as on the individual elements of the composite score which are based on facility health inspections, nurse staffing levels, and performance on quality measures.

Exhibit 6: Comparative 5-Star Nursing Home Ratings



Source: Most recent extracted data CMS update monthly (3/1/17 extract); see <https://www.medicare.gov/nursinghomecompare/search.html> for more information.

Individual profiles of each of New York's 12 CCRCs are provided in the next section:

1. The Amsterdam at Harborside
2. Canterbury Woods
3. Fox Run at Orchard Park
4. Glen Arden
5. Good Shepherd Village at Endwell
6. Jefferson's Ferry
7. Kendal at Ithaca
8. Kendal on Hudson
9. The Knolls, A Bethel Community
10. Peconic Landing at Southold
11. The Summit at Brighton
12. Woodland Pond at New Paltz

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The Amsterdam at Harborside

Port Washington, NY

<http://www.theamsterdamatharborside.com/>



The Amsterdam at Harborside in Port Washington, New York, is an exciting option in retirement living unlike anything else available on the North Shore of Long Island. The Amsterdam is the first true Life Care continuing care retirement community to be built in Nassau County. The Amsterdam offers an all-inclusive retirement lifestyle that combines the benefits and amenities of independent living with access to on-site long-term health care services. Amsterdam at Harborside offers:

- **229 market rate housing apartments;**
- **44 enriched housing apartments, including 17 memory support apartments; and**
- **56 skilled nursing beds.**

The lifestyle at The Amsterdam is all about flexibility and choices. Casual, formal, and private dining options are available, with meals prepared by professional chefs. In addition, weekly housekeeping including linen service, all interior and exterior maintenance, regularly scheduled group transportation, 24-hour security and underground valet parking are included. Full amenities from a beautiful fitness center with heated indoor pool, to a library and creative arts studio.

The Amsterdam is currently 99% sold and occupied and is now offering a wait list. The continuing care model and Life Care structure offer a refundable entry fee to protect one's estate while relieving families of the burden of arranging care for a loved one. Through the Amsterdam's Life Care program, residents can maintain their independence and still leave a substantial financial legacy for their heirs.

The Amsterdam at Harborside contributed approximately **\$72.6 million** in economic activity to the region. In addition to payroll, the Amsterdam at Harborside boosted the local economy by **\$39 million**. The Amsterdam at Harborside, directly and indirectly, supports **194 jobs**.

Did You Know?

- *The Amsterdam has a "Positive-Aging" Initiative which engages the needs and interests of the "whole" person – Body – Mind – and Spirit.*
- *Great sense of community with support groups, volunteering and civic projects, resident art exhibits, live theater and special concerts, to name just a few.*
- *The Amsterdam at Harborside is sponsored by Amsterdam House Continuing Care Retirement Community, a not-for-profit organization affiliated with [Amsterdam Nursing Home](#), founded in New York City more than 140 years ago.*

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Canterbury Woods

Williamsville, NY

<http://canterburywoods.org/>

Canterbury Woods, Western New York's first CCRC, is located in Erie County, and offers:

- **243 market rate housing units;**
- **32 enhanced assisted living residence beds;**
and
- **48 skilled nursing beds.**

Canterbury Woods contributed approximately **\$33.5 million** in economic activity to the region. In addition to payroll, Canterbury Woods boosted the local economy by nearly **\$9.6 million**. Canterbury Woods, directly and indirectly, supports **265 jobs**.

***Did You Know?** Canterbury Woods is home to its very own university! Canterbury University is led by Canterbury Woods residents who lead educational programs on philosophy; the Old Testament; the Middle East; the Iliad and the Odyssey; economics; Renaissance art; the Stone Age; the Russian Revolution; the Spanish in America; astronomy; western literature; and classical music. The University was founded by a group of residents who met each week to discuss articles in Scientific American magazine.*



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Fox Run at Orchard Park

Orchard Park, NY

<http://www.foxrunorchardpark.com/>

Fox Run at Orchard Park, located in Erie County, is one of two life care communities in Western New York, and offers:

- **180 market rate housing units;**
- **52 assisted living residence beds including;**
- **18 special needs assisted living residence beds; and**
- **50 skilled nursing beds.**



Fox Run at Orchard Park contributed approximately **\$30.8 million** in economic activity to the region. In addition to payroll, Fox Run at Orchard Park boosted the local economy by **\$12 million**. Fox Run at Orchard Park, directly and indirectly, supports **218 jobs**.

***Did You Know?** Fox Run is home to the Orchard Park Farmer's Market from May through October, rain or shine. The local farmer's market is open to the public and supports local non-profits. Vendor offerings range from fruits and vegetables to local honey and flowers depending on the growing season, and include local food trucks for the lunch crowd.*



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Glen Arden

Goshen, NY

<http://glenardenny.com/>

Glen Arden, located in Orange County in the lush Hudson Valley, offers:

- **148 market rate housing units;**
- **28 enriched housing beds; and**
- **40 skilled nursing beds.**

Glen Arden contributed approximately **\$21.6 million** in economic activity to the region. In addition to payroll, Glen Arden boosted the local economy by **\$9.3 million**. Glen Arden, directly and indirectly, supports **119 jobs**.

Did You Know? Glen Arden hosted a variety of sports tournaments on Sept. 17, 2014 as part of the 31st Annual Orange County Senior Games. Over 100 participants, including several Glen Arden residents, gathered to compete in shuffleboard as well as bocce ball on the community's courts after enjoying a complimentary lunch of Glen Arden's award-winning Chef's Chili.



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Good Shepherd Village at Endwell

Endwell, NY

<http://www.gsvillage.com/>

Good Shepherd Village at Endwell, located on 120 acres in Broome County, is the only fee-for-service CCRC in the state, and offers:



- **154 market rate housing units;**
- **32 assisted living residence (16 enhanced ALR and 16 special needs ALR) beds; and**
- **32 skilled nursing beds.**

Good Shepherd Village at Endwell contributed approximately **\$19.2 million** in economic activity to the region. In addition to payroll, Good Shepherd Village at Endwell boosted the local economy by **\$9.8 million**. Good Shepherd Village at Endwell, directly and indirectly, supports **150 jobs**.

Did You Know?

- *Our residents understand that the holidays can be a difficult time for some in our community. To help make a difference and stop hunger, the CCRC hosts the “Helping Hands” Soup & Biscuit Luncheon twice a year. All residents that attend make a monetary contribution and donate non-perishable food items, in exchange for a simple soup lunch, prepared by Sodexo Dining Services. The proceeds benefit the Community Hunger Outreach Warehouse and the Maine Endwell Assisting Local Spartans program. These two events raise over \$1,000 annually, in addition to collecting hundreds of pounds of non-perishable food.*
- *The Advocacy Group at Good Shepherd Village at Endwell is comprised of Independent Living residents who are interested in the concerns and well-being of older adults, as well as issues that affect the local community. The group works to inform local representatives to effect legislation concerning seniors and had an opportunity to do so in recent meetings with both New York State Senator Fred Akshar and New York State Assemblywoman Donna Lupardo.*



NYS Senator Fred Akshar, standing in middle, flanked by members of the Advocacy Group at Good Shepherd Village at Endwell.

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Jefferson's Ferry

South Setauket, NY

<http://www.jeffersonsferry.org/>

Jefferson's Ferry, Long Island's first Life Plan Community, is located in South Setauket, just minutes from Port Jefferson Village and Stony Brook University in Suffolk County. Affiliated with the award-winning John T. Mather memorial Hospital, Jefferson's Ferry offers:



- **248 market rate housing units;**
- **60 assisted living apartments; and**
- **60 private skilled nursing suites, including 20 suites specializing in memory care.**

Jefferson's Ferry contributed approximately **\$52.7 million** in economic activity to the region. In addition to payroll, Jefferson's Ferry boosted the local economy by nearly **\$19.8 million**. Jefferson's Ferry, directly and indirectly, supports **300 jobs**.

***Did You Know?** Jefferson's Ferry implemented some "BRIGHT" and environmentally friendly ideas to reduce energy usage and save money. The Resident Conservation Committee, including retirement engineers, crunched the numbers with management on a project to convert more than 2,700 lightbulbs to LED reducing electrical usage by more than 70% and saving the Community over \$140,000 per year. As an added bonus, all but \$1,500 of the costs of conversion were paid by a grant from PSEG Long Island*



The Jefferson's Ferry Conservation Committee

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Kendal at Ithaca

Ithaca, NY

<http://kai.kendal.org/>

Kendal at Ithaca, located on 105 acres in Tompkins County, offers:

- **212 market rate housing units;**
- **36 enhanced assisted living residence beds; and**
- **35 skilled nursing beds.**

Kendal at Ithaca, contributed approximately **\$28.7 million** in economic activity to the region.

In addition to payroll, Kendal at Ithaca boosted the local economy by **\$8.9 million**. Kendal at Ithaca, directly and indirectly, supports **212 jobs**.

***Did You Know?** Kendal at Ithaca produces about 120 gallons of wine each year, earning the reputation of the "smallest winery in the Finger Lakes." The winery was actually in the making before Kendal's doors opened in 1995, courtesy of future residents of Kendal at Ithaca who wanted to coordinate a winemakers group. The winery was featured in Edible Finger Lakes Magazine in an article written by Charles Wilcox, president of the Kendal at Ithaca Resident Council.*



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Kendal on Hudson

Sleepy Hollow, NY

<http://kohud.kendal.org/>

Kendal on Hudson, overlooking the Hudson River in Westchester County, offers:

- **222 market rate housing units;**
- **34 Assisted Living/Enhanced AL beds;**
- **13 Assisted Living/Special Needs/Memory Care beds; and**
- **26 skilled nursing beds.**



Kendal on Hudson contributed approximately **\$50.3 million** in economic activity to the region. In addition to payroll, Kendal on Hudson boosted the local economy by **\$21.5 million**. Kendal on Hudson, directly and indirectly, supports **204 jobs**.

***Did You Know?** In 2010, Kendal on Hudson received the LeadingAge NY Innovation of the Year Award for the CO-Pilots program – a resident-run program that sends a resident volunteer to the emergency room with any resident who would otherwise be going to the hospital alone. The resident volunteer is there for moral support, to make phone calls, run errands until the situation is taken care of or a family member arrives. The program operates 24 hours a day, seven days a week with co-pilots on call. Dozens of residents have served as co-pilots and about 100 residents have been the recipient of the support.*



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The Knolls, A Bethel Community

Westchester, NY

<http://www.theknolls.org/>

The Knolls is in desirable Westchester County, on a 30-acre campus in a beautifully serene setting that's also close to many of the New York City attractions that you know and love—with convenient driving and rail connections nearby. The Knolls offers:

- **120 market rate housing units;**
- **20 assisted living beds; and**
- **10 skilled nursing beds.**

The Knolls will contribute an estimated **\$20.8 million** in economic activity to the region. In addition to payroll, The Knolls will boost the local economy by **\$4.5 million**. The Knolls, directly and indirectly, supports **63 jobs**.

Did You Know? *As a Continuing Care Retirement Community, The Knolls offers seniors a comfortable lifestyle with an abundance of services and amenities to support their busy lives!*

Spacious apartment homes, elegant and casual dining rooms, a cultural arts program, an indoor pool, housekeeping and transportation are just a few of the features offered at The Knolls, a not-for-profit Continuing Care Retirement Community in Westchester County offering seniors an amazing and worry-free lifestyle at an exceptional value.



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Peconic Landing at Southold

Greenport, NY

<http://peconiclanding.com/>

Peconic Landing at Southold is located on 144 acres next to the Long Island Sound in Suffolk County, and offers:

- **296 market rate housing units;**
- **42 enriched housing beds; and**
- **60 skilled nursing beds.**



Peconic Landing at Southold contributed approximately **\$53.8 million** in economic activity to the region. In addition to payroll, Peconic Landing at Southold boosted the local economy by **\$20 million**. Peconic Landing at Southold, directly and indirectly, supports **265 jobs**.

***Did You Know?** Leading Age New York honored Peconic Landing with the Innovation of the Year Award for 2016. Peconic Landing, the award-winning life care retirement community in Greenport, embraced this experiential music program bringing one-on-one live music performances to the bedside of seniors receiving comfort care. These special one-on-one sessions have been provided by local volunteer musicians. Benefits of this program for members include comfort, presence, emotional support, communication, engagement, joy, and support of physical well-being.*



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The Summit at Brighton

Rochester, NY

<http://www.summitbrighton.org/>

The Summit at Brighton, located in Monroe County, offers:

- **90 market rate housing units;**
- **67 assisted living beds;**
- **18 special needs assisted living beds (memory care); and**
- **362 skilled nursing beds.**



The Summit at Brighton contributed approximately **\$19 million** in economic activity to the region. In addition to payroll, the Summit at Brighton boosted the local economy by **\$8.5 million**. The Summit at Brighton, directly and indirectly, supports **160 jobs**.

***Did You Know?** The Summit at Brighton offers a very innovative Music and Memory Program. With this program, the Summit is able to offer residents access to individualized iPods that have music downloaded specifically for each resident. The music and memory program is especially effective with residents in the Assisted Living and memory care programs.*



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Woodland Pond at New Paltz

New Paltz, NY

<http://wpatnp.org/>

Woodland Pond at New Paltz, located in Ulster County, is nestled upon 83 acres. The organization offers:

- 201 market rate housing units;
- 40 enriched housing beds;
- 20 special needs assisted living residence beds; and
- 40 skilled nursing beds.



Woodland Pond at New Paltz contributed approximately **\$42.7 million** in economic activity to the region. In addition to payroll, the Woodland Pond at New Paltz boosted the local economy by **\$10.6 million**. Woodland Pond at New Paltz, directly and indirectly, supports **238 jobs**.

***Did You Know?** On Valentine's Day, residents and staff of Woodland Pond at New Paltz participated in the worldwide "One Billion Rising" movement, to end violence against women. Dressed in shades of red, the ladies, a few men and their caretakers danced the routine three times!*



Conclusion

The stories are all around us – not only do CCRCs support their local economies and create jobs, but most importantly, they bring about a sense of community. Although these economic powerhouses bring in tens of millions of dollars in economic activity locally, and nearly a half a billion dollars to the State each year, state regulation and the associated costs and time delays are a major barrier to further development.

To encourage the development of CCRCs in New York, LeadingAge New York and its membership have developed and are advocating for CCRC revitalization legislation that would update the nearly 30-year-old provisions of Article 46 of the NYS Public Health Law. To be successful in this advocacy, it is critically important to educate policymakers and other stakeholders about these organizations, which offer so much to their residents, local communities and New York State.

About LeadingAge New York

Founded in 1961, LeadingAge New York is the only statewide organization representing the entire continuum of not-for-profit, mission-driven and public continuing care, including CCRCs, nursing homes, adult care facilities, assisted living programs, home and community-based services, adult day health care, senior housing, and managed long term care plans. LeadingAge New York's nearly 500 members serve an estimated 500,000 New Yorkers of all ages annually.

ⁱ 2015 Ziegler National CCRC Listing and Profile

ⁱⁱ Ibid.

ⁱⁱⁱ Ibid.