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September 8, 2026

Raynard E. Washington, PhD
Commissioner
New Jersey Department of Health
PO Box 360
Trenton, NJ 08625-0360
Via email: raynard.washington@doh.nj.gov

Neil Eicher
Deputy Commissioner for Health Systems
New Jersey Department of Health
PO Box 360
Trenton, NJ 08625-0360
Via email: neil.eicher@doh.nj.gov

Re: Proposed Transfer of Ownership of Silver Healthcare Center, Cherry Hill (December 31, 2025 Application)

Dear Commissioner Washington and Deputy Commissioner Eicher:

I write on behalf of the New Jersey Health Care Quality Institute ("Quality Institute") to join in the comments and objections submitted by New Jersey Citizen Action ("NJCA") in the above-referenced Silver Healthcare nursing home transfer of ownership application submitted on behalf of proposed new owners Benjamin Kurland and Joseph Schlanger. For the reasons set forth in NJCA's letter, the Department should deny the pending transfer of ownership and provide a comprehensive record of the reasons for doing so. Given this transfer of ownership application record, which includes an incomplete application that contains numerous factual bases that mandate denial, the Department has no alternative but to deny the application. Having a full record of its determination will encourage future applicants to provide complete submissions that include all legally required or requested information, even when such information is not favorable to the applicant.

The Quality Institute is a nonprofit, nonpartisan, multi-stakeholder membership organization with a mission to improve the safety, quality, and affordability of health care for New Jersey residents. We have a long-standing history of working closely with state government, particularly the Department of Health, to promote safety, transparency, and accountability in licensed health care facilities throughout New Jersey. We serve on the Department's Quality Improvement Advisory Committee, Maternal Child Quality Commission, and many ad hoc task forces and work groups that advance

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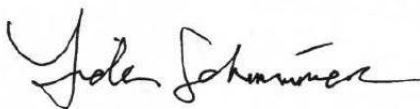
public health, safety and transparency. Through each of the Quality Institute's three focus areas – Quality, Policy, and Community Health – we address issues that directly affect nursing home residents in New Jersey. The Quality Institute has a longstanding commitment to ensuring that nursing home residents receive quality care that meets their needs and enables them to attain and maintain their highest physical, mental, emotional, and functional status. Accordingly, we provide our perspective on this transfer of ownership application review process from the vantage point of a knowledgeable party trying to assess whether this transfer is in the best interests of the residents of this nursing home under applicable legal standards. For the reasons set forth in NJCA's letter, we submit that this application is not in the best interest of these residents (and future residents) and, therefore, request that the Department deny the application.

The Quality Institute greatly appreciates NJCA's submission because it provides a comprehensive roadmap that outlines the transfer of ownership application review process, legal standard of review for each submission component, and sets forth the many fact-based reasons why the Department should deny the application for both mandatory and discretionary bases.

We join NJCA in their call to the Department to scrupulously perform its oversight functions for this transfer of ownership application and all others in the future. Applying the relevant law and regulations, including the 2021 statutory amendments that granted the Department additional oversight authority to ensure that it could adequately protect the health, safety, and welfare of nursing home residents, the Department must assess whether this incomplete application, these proposed owners with track records that include ownership of nursing homes with "immediate jeopardy" citations, and the financial terms of this transaction, some of which lead to additional questions about committing to ensuring funds go to save staffing and care, is in the best interest of current and future residents. For the reasons well-articulated by NJCA, we believe that after the Department performs this analysis, it will conclude, as the law requires, that this transfer of ownership application is deficient and that these owners have shown themselves suitable to purchase this facility. Accordingly, we respectfully request that the Department deny this application and, in doing so, that it provides a robust record of the reasons for its action.

The Quality Institute thanks the Department in advance for granting interested parties the opportunity to share their thoughts and concerns regarding this important process. We know that the Department takes its oversight role seriously and trust that it will issue a thorough and well-reasoned determination. By doing so, the Department will demonstrate its commitment to the health, safety, and welfare of the residents of this nursing home as well as those residing in other nursing homes that may be the subject of future transfer of ownership applications.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Linda J. Schwimmer". The signature is fluid and cursive, with the first name "Linda" being more prominent.

Linda J. Schwimmer
President and CEO
New Jersey Health Care Quality Institute