



STATE OF MARYLAND

DHMH

Maryland Department of Health and Mental Hygiene  
Office of Health Care Quality  
Spring Grove Center • Bland Bryant Building  
55 Wade Avenue • Catonsville, Maryland 21228-4663

Martin O'Malley, Governor – Anthony G. Brown, Lt. Governor – Joshua M. Sharfstein, M.D., Secretary

February 27, 2014

Mr. Terry Forde  
Executive Vice President and Chief Operating Officer  
Adventist HealthCare  
820 West Diamond Avenue, Suite 600  
Gaithersburg MD 20878

Dear Mr. Forde:

The Office of Health Care Quality has received and reviewed your letter regarding the reallocation of the behavioral health beds at Adventist Behavioral HealthCare.

The Office of Health Care Quality sees no issues with Adventist Behavioral HealthCare acquiring and operating the beds at the current location at Washington Adventist Hospital. However, under Maryland regulations COMAR 10.07.01.06A, which states “Separate licenses are required for institutions maintained on separate premises, even though both institutions are operated under the same management.” Therefore, this office must issue a separate license to each site.

The Centers for Medicare and Medicaid Services will allow satellite hospitals to operate under one CCN and as such we believe that this facility will qualify as a provider based facility under the CCN for Adventist Behavioral HealthCare. The facility will be required to complete and submit all necessary paperwork including a CMS 855 to the Centers for Medicare and Medicaid Services for approval of the provider based status for the Washington Adventist Hospital. The hospital particularly the Washington Adventist location may be subject to an initial survey by CMS for compliance with the two Special Conditions for Medicare for Psychiatric Hospitals.

In order for the hospital to be approved for provider based status both hospitals must be fully integrated including but not limited to a single medical staff, governing body, medical staff, and quality assurance and performance improvement program. Minutes for committees should reflect whether the issues discussed are system wide or particular to a specific site or location. The Office will allow this for licensure purposes despite the separate licenses. It is anticipated



that all combined services will be easily accessible at both facilities and staff who work at both facilities are trained on site specific variations in operation.

For licensing purposes the two licensed hospitals must be able to generate individual site based data for the Maryland Health Care Commission and the Health Services Cost Review Commission.

The Adventist Rehabilitation Hospital unit is currently considered a hospital within a hospital (Washington Adventist Hospital) under its CCN. The proposed plan will require that Adventist Behavioral Health Care to become the new hospital in which Adventist Rehabilitation Hospital is located. Therefore, all required forms including a CMS 855 must be filed and approved by Centers for Medicare and Medicaid Services. The health system may also want to consider operating the unit of Adventist Rehabilitation Hospital as a separate licensed entity in much the same way as the behavioral health facility will operate.

The Office of Health Care Quality will be continue to work with your organization in order to facilitate these plans for your new hospital and the reconfiguration of the Adventist Behavioral Health and Adventist Rehabilitation Hospital. Please feel free to contact me with any questions or concerns at (410)402-8090.

Sincerely;

A handwritten signature in black ink, appearing to read "Renee B. Webster". The signature is fluid and cursive, with a large initial "R" and "W".

Renee B. Webster, Assistant Director  
Hospitals, Laboratories and Patient Safety