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**DIXON HUGHES GOODMAN** LLP  
Certified Public Accountants and Advisors

October 2, 2014

Mr. Joel Riklin  
Program Manager  
Certificate of Need  
Maryland Health Care Commission  
4160 Patterson Avenue  
Baltimore, MD 21215

Docket No: 12-16-2334

Dear: Mr. Riklin:

In response to your letter of September 23, 2014, and on behalf of Fort Washington Medical Center, please accept the enclosed six (6) copies of a supplementary filing to the updated Certificate of Need application for a proposed expansion and renovation project submitted on September 5, 2014. In addition, we have included in this submission two letters of support for the project from members of the Ft. Washington Medical Center medical staff. Please add these documents to the updated application as Attachment 8.

I have provided you and Ms. Potter an electronic version of this filing in pdf format as you have requested.

We look forward to working with you and the other members of the staff of the Commission during the course of its review.

Should you have any questions regarding this application, please contact Ms. Verna S. Meacham, President and CEO, at 301-686-9010.

Very truly yours,

Richard J. Coughlan

cc: Pamela B. Creekmur

|   |  |             |
|---|--|-------------|
| <b>Heart Failure Performance Over Time</b>                  |  |             |
|   | <b>Giving Instructions – Leave</b>       | <b>100%</b> |
|   | <b>Performing Heart Test</b>             | <b>99%</b>  |
|   | <b>Giving Recommended Meds</b>           | <b>96%</b>  |
| <b>Immunization</b>   |  |             |
|   | <b>Pneumococcal Immunization</b>         | <b>93%</b>  |
|   | <b>Influenza Immunization</b>            | <b>90%</b>  |
| <b>Pneumonia (PN)</b>                                       |  |             |
|   | <b>Blood Cultures</b>                    | <b>94%</b>  |
|   | <b>Appropriate Antibiotic</b>            | <b>100%</b> |
| <b>Surgical Care Improvement Project (SCIP) Performance</b> |  |             |
|   | <b>Prophylactic Antibiotic</b>           | <b>100%</b> |
|   | <b>Antibiotic Selection</b>              | <b>99%</b>  |
|   | <b>Antibiotic Discontinuation</b>        | <b>92%</b>  |
|   | <b>Cardiac Surgery</b>                   | <b>N/A</b>  |
|   | <b>Surgery Patient Hair Removal</b>      | <b>100%</b> |
|   | <b>Urinary Catheter Removal</b>          | <b>92%</b>  |
|   | <b>Surgery Patients Temp. Manage.</b>    | <b>100%</b> |
| <b>Managing Heart Drugs</b>                                 |  |             |
|   | <b>Surgery Patient Beta-Blocker</b>      | <b>88%</b>  |
| <b>Preventing Blood Clots</b>                               |  |             |
|   | <b>Treatment to Prevent Blood Clots</b>  | <b>100%</b> |
|   | <b>Appropriate Time to Prevent Clots</b> | <b>100%</b> |

**FWMC has taken steps to address core quality measure performance. The relevant steps for the measure for which FWMC performed under 90% are addressed below:**

- 1. In November of 2011, the VP of Patient Services established a SCIP Action Team with the goal of achieving 100% compliance 100% of the time.**
- 2. The team consisted of the Nursing Directors (OR & Med/Surg), Director of Pharmacy, the performance improvement coordinators, and Surgeons.**
- 3. Communication posters were developed and sent to the clinical units with graphs of performance and descriptions of the measures.**
- 4. An In-Service was presented by PI Coordinator for nursing staff.**
- 5. Monthly reports of successes, and misses were sent to physicians and Leadership.**
- 6. Misses were analyzed monthly with appropriate staff and action plans**

developed.

7. Surgeons reviewed charts with misses and advised the committee and other surgeons.

8. Core Measure Bulletin Board established and maintained for staff and visitors with descriptions of core measures and performance graphs.

Results: With regard to Surgery Patient Beta Blockers - the hospital achieved 100% compliance in every quarter of 2013, and 90% compliance through June, 2014. (See Chart below)

|   |  |  |  |  |  |  |  |  |  |  |  |  |  |
|---|--|--|--|--|--|--|--|--|--|--|--|--|--|
| <b>Ft. Washington Medical Center</b><br>Surgery Patients on Beta-Blocker Therapy<br>Prior to Admission Who Received a Beta-Blocker<br>During the Perioperative Period |  |  |  |  |  |  |  |  |  |  |  |  |  |
|---|--|--|--|--|--|--|--|--|--|--|--|--|--|

| 2012     |         |          |       |       |     |      |      |        |           |         |          |          |       |
|----------|---------|----------|-------|-------|-----|------|------|--------|-----------|---------|----------|----------|-------|
|          | January | February | March | April | May | June | July | August | September | October | November | December | TOTAL |
| Total    | 2       | 1        | 2     | 4     | 4   | 2    | 4    | 1      | 2         | 3       | 1        | 0        | 26    |
| Received | 2       | 1        | 2     | 3     | 3   | 2    | 4    | 1      | 2         | 2       | 1        | 0        | 23    |
| %        | 100%    | 100%     | 100%  | 75%   | 75% | 100% | 100% | 100%   | 100%      | 67%     | 100%     | N/A      | 88%   |

| 2013     |         |          |       |       |      |      |      |        |           |         |          |          |       |
|----------|---------|----------|-------|-------|------|------|------|--------|-----------|---------|----------|----------|-------|
|          | January | February | March | April | May  | June | July | August | September | October | November | December | TOTAL |
| Total    | 2       | 4        | 4     | 2     | 3    | 4    | 3    | 4      | 0         | 1       | 1        | 3        | 31    |
| Received | 2       | 4        | 4     | 2     | 3    | 4    | 3    | 4      | 0         | 1       | 1        | 3        | 31    |
| %        | 100%    | 100%     | 100%  | 100%  | 100% | 100% | 100% | 100%   | N/A       | 100%    | 100%     | 100%     | 100%  |

| 2014     |         |          |       |       |     |      |      |        |           |         |          |          |       |
|----------|---------|----------|-------|-------|-----|------|------|--------|-----------|---------|----------|----------|-------|
|          | January | February | March | April | May | June | July | August | September | October | November | December | TOTAL |
| Total    | 2       | 3        | 1     | 1     | 2   | 1    |      |        |           |         |          |          | 10    |
| Received | 2       | 3        | 1     | 1     | 1   | 1    |      |        |           |         |          |          | 9     |
| %        | 100%    | 100%     | 100%  | 100%  | 50% | 100% | N/A  | N/A    | N/A       | N/A     | N/A      | N/A      | 90%   |

Source: FWMC.

**And, as a result of these and continued efforts, Fort Washington was recipient of the 2014 DelMarva Excellence Award for Quality Improvement.**

10.24.01.08G(3)(b). Need.

*For purposes of evaluating an application under this subsection, the Commission shall consider the applicable need analysis in the State Health Plan. If no State Health Plan need analysis is applicable, the Commission shall consider whether the applicant has demonstrated unmet needs of the population to be served, and established that the proposed project meets those needs.*

Please discuss the need of the population served or to be served by the Project.

Responses should include a quantitative analysis that, at a minimum, describes the Project's expected service area, population size, characteristics, and projected growth. For applications proposing to address the need of special population groups identified in this criterion, please specifically identify those populations that are underserved and describe how this Project will address their needs.

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**FWMC's Update Response COMAR 10.24.01.0G(3)(b). Need.**

**Among the services not discussed in Response to 10.24.01.08G(3)(a). The State Health Plan, are the surgical services of the Hospital. As is the case for all Maryland acute care general hospitals, FWMC provides both inpatient and outpatient surgery. The current inventory of surgical capacity of FWMC is three operating rooms and two procedure rooms. The design of this Project will not change the total capacity of the Hospital to provide surgery services.**

**Shown below are the historical and projected volumes of surgical cases and minutes at FWMC, which indicate that the Hospital will continue to need its three operating rooms.**

| <b>CHART 9. Fort Washington Medical Center</b>                               |  |                                 |                        |                      |                            |                               |
|--|--|---------------------------------|------------------------|----------------------|----------------------------|-------------------------------|
| <b>Summary of Historical and Projected Surgical Utilization and Capacity</b> |  |                                 |                        |                      |                            |                               |
| <b>Year</b>  | <b>Total Inpatient Surgical Cases</b>  | <b>Total Inpatient Minutes</b>  | <b>Cleanup Minutes</b> | <b>Total Minutes</b> | <b>Optimal Utilization</b> | <b>Operating Rooms Needed</b> |
| <b>Historical</b>  |  |                                 |                        |                      |                            |                               |
| 2011   | 773                                    | 92,102                          | 23,190                 | 115,292              | 114,000                    | 1.01                          |
| 2012   | 699                                    | 58,510                          | 20,970                 | 79,480               | 114,000                    | 0.70                          |
| 2013   | 628                                    | 54,552                          | 18,840                 | 73,392               | 114,000                    | 0.64                          |
| <b>Projected</b>   |  |                                 | -                      | -                    |                            |                               |
| 2014   | 532                                    | 54,405                          | 15,952                 | 70,356               | 114,000                    | 0.62                          |
| 2015   | 555                                    | 56,905                          | 16,642                 | 73,546               | 114,000                    | 0.65                          |
| 2016   | 600                                    | 61,905                          | 17,992                 | 79,896               | 114,000                    | 0.70                          |
| 2017   | 668                                    | 69,405                          | 20,032                 | 89,436               | 114,000                    | 0.78                          |
| 2018   | 743                                    | 79,405                          | 22,282                 | 101,686              | 114,000                    | 0.89                          |
| 2019   | 743                                    | 89,405                          | 22,282                 | 111,686              | 114,000                    | 0.98                          |
| <b>Year</b>  | <b>Total Outpatient Surgical Cases</b> | <b>Total Outpatient Minutes</b> | <b>Cleanup Minutes</b> | <b>Total Minutes</b> | <b>Optimal Utilization</b> | <b>Operating Rooms Needed</b> |
| <b>Historical</b>  |  |                                 |                        |                      |                            |                               |
| 2011   | 2,070                                  | 108,998                         | 23,190                 | 132,188              | 114,000                    | 1.16                          |
| 2012   | 2,381                                  | 126,466                         | 71,430                 | 197,896              | 114,000                    | 1.74                          |
| 2013   | 2,132                                  | 112,672                         | 63,960                 | 176,632              | 114,000                    |                               |
| <b>Projected</b>   |  |                                 |                        |                      |                            |                               |
| 2014   | 1,945                                  | 100,420                         | 58,355                 | 158,775              | 114,000                    | 1.39                          |
| 2015   | 2,084                                  | 105,295                         | 62,520                 | 167,815              | 114,000                    | 1.47                          |
| 2016   | 2,095                                  | 115,045                         | 62,850                 | 177,895              | 114,000                    | 1.56                          |
| 2017   | 2,139                                  | 129,670                         | 64,170                 | 193,840              | 114,000                    | 1.70                          |
| 2018   | 2,176                                  | 149,170                         | 65,280                 | 214,450              | 114,000                    | 1.88                          |
| 2019   | 2,213                                  | 168,670                         | 66,390                 | 235,060              | 114,000                    | 2.06                          |
| <b>Year</b>  | <b>Total Surgical Cases</b>            | <b>Total Minutes</b>            | <b>Cleanup Minutes</b> | <b>Total Minutes</b> | <b>Optimal Utilization</b> | <b>Operating Rooms Needed</b> |
| <b>Historical</b>  |  |                                 |                        |                      |                            |                               |
| 2011   | 2,843                                  | 201,100                         | 46,380                 | 247,480              | 114,000                    | 2.17                          |
| 2012   | 3,080                                  | 184,976                         | 92,400                 | 277,376              | 114,000                    | 2.43                          |
| 2013   | 2,760                                  | 167,224                         | 82,800                 | 250,024              | 114,000                    | 2.19                          |
| <b>Projected</b>   |  |                                 |                        |                      |                            |                               |
| 2014   | 2,477                                  | 154,825                         | 74,307                 | 229,131              | 114,000                    | 2.01                          |
| 2015   | 2,639                                  | 162,200                         | 79,162                 | 241,361              | 114,000                    | 2.12                          |
| 2016   | 2,695                                  | 176,950                         | 80,842                 | 257,791              | 114,000                    | 2.26                          |
| 2017   | 2,807                                  | 199,075                         | 84,202                 | 283,276              | 114,000                    | 2.48                          |
| 2018   | 2,919                                  | 228,575                         | 87,562                 | 316,136              | 114,000                    | 2.77                          |
| 2019   | 2,956                                  | 258,075                         | 88,672                 | 346,746              | 114,000                    | 3.04                          |

Source: FWMC.

**Resource Department. Sources available for recruiting additional personnel include, but are not limited to: Newspaper and magazine advertising; attendance at job fairs and career days; open houses; direct mailings; educational contacts and affiliations; internship programs; and word-of-mouth.**

1. recruitment and retention plans for those personnel believed to be in short supply;

**The Hospital currently uses a variety of techniques to fill positions when vacancies occur for personnel which may in the future be in short supply, including a combination of web postings, newspaper advertising, employee referral programs and participation in job fairs.**

2. for existing facilities, a report on average vacancy rate and turnover rates for affected positions,

**The positions to be affected by the Project are shown on TABLE 5. Below. The current hospital turnover and vacancy rates for CY 2013 and YTD 2014 are:**

| <b>FWMC Turnover and Vacancy Rates</b> |      |          |
|--|------|----------|
|  | 2013 | YTD 2014 |
| <b>Turnover</b>                        |      |          |
| RN                                     | 3.59 | 4.03     |
| Hospitalwide                           | 0.99 | 1.47     |
| <b>Vacancy</b>                         |      |          |
| RN                                     | 7.74 | 9.75     |
| Hospitalwide                           | 4.19 | 5.82     |

Source: FWMC.

**AFFIRMATION**

I hereby declare and affirm under the penalties of perjury that the facts stated in the foregoing supplementary information to the updated Certificate of Need Application and its attachments are true and correct to the best of my knowledge, information, and belief.

RT Cowgman  
Name and Title

10/2/14  
Date

# ATTACHMENT 8

**FELIPE A. RODRIGUEZ, M.D.**

TAX 1.0. No. 52=1669520

11701 Livingston Road, Suite 200  
Ft. Washington, Maryland 20744

301-292-7171  
Fax 3014924090

September 16, 2014

Mr. Paul Parker  
Director, CON Program  
Maryland Health Care Commission  
4.150 Patterson Avenue Baltimore, MD 21215  
Baltimore, MD 21215

Re: CON Application for the Proposed Expansion of FWMC

Dear Mr. Parker

I am a physician on staff at Fort Washington Medical Center (FWMC) specializing in General Surgery. My Practice has been located in the Fort Washington area for more than twenty years. Types of procedures that I perform include laparoscopic appendectomy, gallbladder removal, bowel resection, hernia repair and other general surgical procedures,

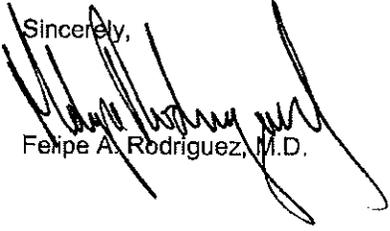
I'm sending you this letter to express my support of the FWMC plan to expand, modernize and upgrade the Surgery department acute care unit, and Emergency Department. Once the plan is completed I expect that the number of surgeries I perform at FWMC will increase, especially for my patients who reside in the area.

From the period between July of 2013 and June of 2014 I performed 209 surgeries at FWMC. I am also on staff at other Metropolitan Washington area hospitals where I perform surgery on other patients, including some who reside in FWMC's primary and secondary service areas. Some of those surgical procedures might have been performed at FWMC had the proposed expansion and modernization features been available at the time.

I believe that the proposed plan to upgrade and expand the FWMC physical plant will be a welcome complementary alternative to other area hospitals, and will be an important essential resource for my patients, my practice and the community at-large.

I urge you to approve the Certificate of Need application submitted by FWMC. Should you have any questions, please contact me.

Sincerely,



Felipe A. Rodriguez, M.D.

FAR/bs

**Keith Kelly, M.D., MBA, PC**

Gynecology  
11701 Livingston Road  
Suite 301  
Fort Washington, MD 20744  
Telephone: 301-632-6900

September 16, 2014

Mr. Paul Parker  
Director, CON Program  
Maryland Health Care Commission  
4.150 Patterson Avenue Baltimore, MD 21215  
Baltimore, MD 21215

Re: CON Application for the Proposed Expansion of FWMC

Dear Mr. Parker

I am a physician on staff at Fort Washington Medical Center (FWMC) specializing in Gynecology. My Practice has been located in the Fort Washington area for more than five years. Types of procedures that I perform include laparoscopic surgery, inpatient abdominal surgery, endometrial ablation, and others.

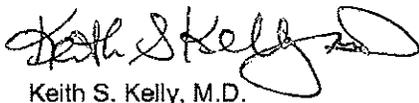
I'm sending you this letter to express my support of the FWMC plan to expand, modernize and upgrade the Surgery department, and Emergency Department. Once the plan is completed I expect that the number of surgeries I perform at FWMC will increase, especially for my patients who reside in the area.

From the period between July of 2013 and June of 2014 I performed 188 surgeries at FWMC. I am also on staff at other Metropolitan Washington area hospitals where I perform surgery on other patients, including some who reside in FWMC's primary and secondary service areas. Some of those surgical procedures might have been performed at FWMC had the proposed expansion and modernization features been available at the time.

I believe that the proposed plan to upgrade and expand the FWMC physical plant will be a welcome complementary alternative to other area hospitals, and will be an important essential resource for my patients, my practice and the community at-large.

I urge you to approve the Certificate of Need application submitted by FWMC. Should you have any questions, please contact me.

Sincerely,



Keith S. Kelly, M.D.

KSK/bs