

November 16, 2015

**\*\*\*CORRECTED LETTER\*\*\***

Howard L. Sollins  
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Kevin McDonald, Chief  
Certificate of Need  
Maryland Health Care Commission  
4160 Patterson Avenue  
Baltimore, Maryland 21215-2229

Offices In  
Maryland  
Washington, D.C.  
Virginia

Re: **Adventist Healthcare Behavioral Health & Wellness Services  
Interested Party Comments in Opposition to  
Seasons Residential Treatment Program, LLC  
Matter No. 14-16-2357**

Dear Mr. McDonald:

Adventist Healthcare Behavioral Health & Wellness Services ("Adventist") operates a behavioral health care facility with 107 Special Hospital-Psychiatric beds and 82 residential treatment center ("RTC") beds in Rockville, and a behavioral health care facility with 15 Special Hospital—Psychiatric beds and 59 RTC beds in Cambridge. As such, Adventist is an existing provider of health care facilities in the same service area identified by the applicant in the above-captioned certificate of need ("CON") review.

Under COMAR 10.24.01.01B(20)(e), Adventist is a person who will be adversely affected, as that term is defined under COMAR 10.24.01.01B(2), by the establishment of a new RTC as proposed by the applicant.

Adventist believes the proposed project is not needed and fails to comply with applicable CON review criteria. Hence, Adventist opposes the CON application of Seasons Residential Treatment Program, LLC, and through undersigned counsel, seeks recognition as an Interested Party by submitting comments in the attached Opposition to Seasons Residential Treatment Program, LLC.

Sincerely,



Howard L. Sollins

HLS  
Enclosure

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Certificate of Need  
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O B E R | K A L E R

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cc: Suellen Wideman, Asst. Atty. General  
Ms. Tyeaesis Johnson  
Pamela B. Creekmur, Health Officer  
Thomas C. Dame, Esq.  
Ms. Ruby Potter

**BEFORE THE MARYLAND HEALTH CARE COMMISSION**

IN THE MATTER OF

SEASONS RESIDENTIAL TREATMENT  
PROGRAM, LLC

Matter No. 14-16-2357

**Adventist Behavioral Health & Wellness Services  
Opposition to Seasons Residential Treatment Program, LLC**

Adventist HealthCare Behavioral Health & Wellness Services (“Adventist”) opposes the CON application of Seasons Residential Treatment Program, LLC (“Seasons RTP”) and seeks recognition as an Interested Party.

**Seasons RTP Proposal**

Seasons RTP has applied for a CON to establish a 72-bed residential treatment center (“RTC”) to be located in Prince George’s County, to serve all of the State of Maryland. The Application proposes that Seasons RTP will:

- meet applicable licensing and certification requirements;
- seek approval to be a Psychiatric Residential Treatment Facility (“PRTF”) under the federal rules and regulations governing such institutions;
- house and treat adolescent girls ages 13 to 18, including a female RTC unit with 18 beds;
- house and treat adolescent boys ages 13 to 18, including a male RTC unit with 18 beds;
- house adult males ages 18-21 in a separate unit;
- have two diagnostic units consisting of 10 beds each for the male and female population;
- serve 13 to 21 year olds with a DSM-V diagnosis, refractory behaviors and co-morbid substance abuse;
- Ensures that all admitted adolescents will have a mental health diagnosis and a clinical history of behavioral challenges due to mental illness.