

# BAKER DONELSON

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HOWARD L. SOLLINS, SHAREHOLDER  
DIRECT DIAL: 410.862.1101  
DIRECT FAX: 443.263.7569  
E-MAIL ADDRESS: HSOLLINS@BAKERDONELSON.COM

August 1, 2017

## VIA HAND DELIVERY AND EMAIL

Kevin McDonald, Chief  
Certificate of Need Division  
Maryland Health Care Commission  
4160 Paterson Avenue  
Baltimore, Maryland 21215

**Re: Adventist Home Health Services, Inc. – Frederick County  
Matter No.: 17-R2-2397  
Response to July 19, 2017 Completeness Questions**

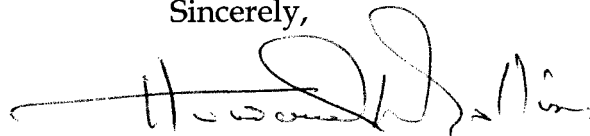
Dear Mr. McDonald:

On behalf of Adventist Home Health Services, Inc. (“AHHS”), we are hereby submitting the required four (4) copies of our responses to the May 24, 2017 completeness questions regarding the above-referenced project. We will also provide Word and electronic copies of our responses and exhibits as appropriate.

I hereby certify that a copy of this response has also been forwarded to the appropriate local health planning agency, as noted below.

If any further information is needed, please let us know.

Sincerely,



Howard L. Sollins

HLS/lam  
Enclosures

cc: Barbara Brookmyer, MD, MPH  
Health Officer - Frederick County

cc: William D. Chan, Health Policy Analyst  
Maryland Health Care Commission  
Ms. Ruby Potter  
Health Facilities Coordination Officer  
Suellen Wideman, Esq.  
Assistant Attorney General  
Marta Harting, Esquire  
Jonathan Montgomery, Esquire  
Keith Ballenger, Vice President  
Adventist Healthcare Home Care Services  
Robert E. Jepson, Vice President/Business Development  
Mr. Andrew L. Solberg  
John J. Eller, Esquire

**Adventist Home Health Services, Inc.**  
**Expansion of an Existing Home Health Agency (HHA license # 7048) to Frederick County**  
**Docket Number 17-R2-2397**  
**Responses to Completeness Questions Received on 7/19/17**

**PART II - CONSISTENCY WITH REVIEW CRITERIA AT COMAR 10.24.01.08(3)**

**Charity Care and Sliding Fee Scale**

- 1. Please provide documentation that Adventist Home Health Services published its Charity Care Policy in Anne Arundel, Calvert, Charles, Howard, Montgomery, Prince George's, and St. Mary's Counties, giving the name of the publication and the date this notice was last published.**

An ad providing notice of Adventist Home Health Services' (AHHS) Charity Care and Sliding Fee Scale was placed in the Washington Post on April 29, 2017 and in the Baltimore Sun on May 31, 2017. The Washington Post and the Baltimore Sun reach all of our service areas throughout the state. Exhibit 10, attached, is the confirmation for both of these ads.

**Quality of Care**

- 2. Please contact the Office of Healthcare Quality and have the agency confirm in writing that Adventist Home Health Services is in good standing with the state.**

The Letter of Good Standing from the Office of Health Care Quality is attached as Exhibit 11.

**Table2A**

- 3. To clarify, please provide an explanation for the overall 2.3 decrease in the number of total client visits (95,202 to 92,985) and the decrease in the number of visits for skilled nursing, home health aide, physical therapy, occupational therapy, and medical social services between 2016 and 2017. Conversely, please provide the assumptions for the significant 15.5 increase in total client visits between 2017 through 2018. The projected utilization numbers in Table 2B does not account for all of the increase between 2017 and 2018.**

The AHHS fiscal year runs from January – December. The 2017 budget, including volume projections, was completed in October 2016 based upon actual Patient Admissions and Patient Visits through July 2016. AHHS ended 2016 with more admissions (7,928) and visits (95,202) than expected due to strong volumes in the second half of 2016.

The projected 15.2% increase from 2017 to 2018 is based upon two factors. First, the increase in service area with Frederick County will drive some volume increase. Second, AHHS originally used a calculation of 11.37 visits per admission for 2017 projections based upon experience in the first half of 2016. However, more recent experience has shown that a visit per admission ratio of 12.008 is more accurate and that was used to project volume in 2018. Indeed, the volume growth experienced by AHHS in the second half of 2016 has continued into the first part of 2017. Current projections show that based upon the volume in the first half of 2017, AHHS is anticipated to end the year with 110,000 patient visits, making the projection of 115,000 in 2018 eminently reasonable especially with the addition of services for patients in Frederick County.

## **Exhibits**

10. Public Notice from Washington Post and Public Notice from Baltimore Sun
11. Letter of Good Standing
12. Affirmations

PROOF OF PUBLICATION

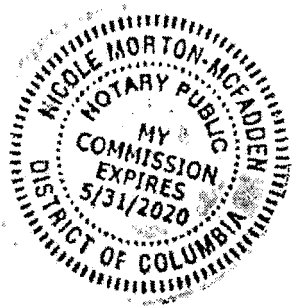
District of Columbia, ss., Personally appeared before me, a Notary Public in and for the said District, Alba Cortes well known to me to be BILLING SUPERVISOR of The Washington Post, a daily newspaper published in the City of Washington, District of Columbia, and making oath in due form of law that an advertisement containing the language annexed hereto was published in said newspaper on the dates mentioned in the certificate herein.

I Hereby Certify that the attached advertisement was published in The Washington Post, a daily newspaper, upon the following date(s) at a cost of \$547.72 and was circulated in the Washington metropolitan area.

Published 1 time(s). Date(s):29 of April 2017

Account 2010239567

Witness my hand and official seal this Alba Cortes day of May 20 17  
[Signature]  
My commission expires 5/31/2020



PUBLIC NOTICE Adventist Home Health Services, Inc., will make available to all patients (or their guarantors) the highest quality of medical care possible within the resources available regardless of race, creed, gender, age, sexual orientation, national origin or financial status who are uninsured, underinsured, have experienced a catastrophic event and lack adequate resources to pay for services. If there is no medical insurance for reimbursement, the patient (or the patient's guarantor) is responsible for payment. However, if the patient or guarantor does not have the ability to pay AHH for services rendered they may apply for charity care, a sliding fee scale or time payments. Probable eligibility will be decided within two business days after receipt of the application. The amount of assistance will be based on current Federal Income Poverty Guidelines. Applications are available by calling: 1-800-506-1063 or on our website: <http://www.adventisthealthcare.com/locations/adventist-home-care/about/#>. WQDyikUrLcs[adventisthealthcare.com]

# CLASSIFIED

SATURDAY, APRIL 29, 2017

washingtonpost.com/classifieds

**the best expert on local jobs**  
washingtonpost.com/jobs

**new and pre-owned cars, trucks and SUVs**  
cars.com

**homes for sale, commercial real estate**  
washingtonpost.com/realestate

**rentals**  
apartments.com

**merchandise, garage sales, auctions, tickets**  
washingtonpost.com/merchandise

**dogs, cats, birds, fish**  
washingtonpost.com/pets

**Trusts 2023**  
mypublicwashingtonpost.com

**Small Collector's Club**  
FOR COLLECTIBLES  
Call 202-338-2214

**Garage Sales, VA**  
Call 202-338-2214

**Sherry Chase MD REAL ESTATE SERVICES**  
Call 202-338-2214

**ITALIAN-AMERICAN CARE CENTER**  
Call 202-338-2214

**Public Notices**  
Call 202-338-2214

**THE BOARD OF LOT & EASE**  
Call 202-338-2214

**Antiques & Auctions**  
Call 202-338-2214

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501 N. Calvert St., P.O. Box 1377  
Baltimore, Maryland 21278-0001  
tel: 410/332-6000  
800/829-8000

WE HEREBY CERTIFY, that the annexed advertisement of Order No 4992841

**Sold To:**

Adventist HealthCare - CU00602604  
820 W Diamond Ave  
Ste 600  
Gaithersburg, MD 20878-1469

**Bill To:**

Adventist HealthCare - CU00602604  
820 W Diamond Ave  
Ste 600  
Gaithersburg, MD 20878-1469

Was published in "The Baltimore Sun", "Daily", a newspaper printed and published in Baltimore City on the following dates:

May 31, 2017

The Baltimore Sun Media Group

By Shanna Evans

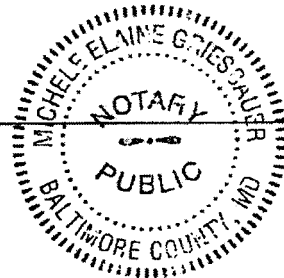
Subscribed and sworn to before me this 31 day of May 2017

By \_\_\_\_\_

Michelle Elaine

Notary Public

My commission expires 10/5/19







**Exhibit 11**  
**Letter of Good Standing**



STATE OF MARYLAND

DHMH

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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

*Larry Hogan, Governor - Boyd K. Rutherford, Lt. Governor - Dennis R. Schrader, Secretary*

July 27, 2017

Keith Ballenger, Administrator  
Adventist Healthcare Home Care Services  
12041 Bournefield Way, Suite B  
Silver Spring, MD 20904

Dear Mr. Ballenger:

As of this date and the past 12 months our records have no indications of Adventist Home Health Services license #HH7032 being out of compliance. Therefore your agency is in Good standing with the Office of Health Care Quality.

If you have any questions please contact our office at (410)402-8038.

Sincerely,

Roslyn Tyson  
Program Coordinator



**Exhibit 12**  
**Affirmations**

**Exhibit 12**  
**Affirmations**

I hereby declare and affirm under the penalties of perjury that the facts stated in this application and its attachments are true and correct to the best of my knowledge, information, and belief.


*Keith Ballenger*

\_\_\_\_\_  
Keith Ballenger  
Vice President,  
Adventist HealthCare Home Care Services

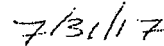
*7/31/17*

\_\_\_\_\_  
Date

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Linda Beth Berman  
Manager, Grants Management Department  
Adventist HealthCare

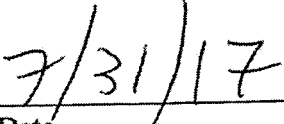


Date

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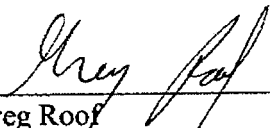
Robert E. Jepson  
Vice President, Business Development  
Adventist HealthCare Washington Adventist Hospital

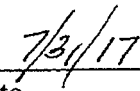


Date



I hereby declare and affirm under the penalties of perjury that the facts stated in this application and its attachments are true and correct to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
Greg Roof  
Director of Finance  
Adventist HealthCare Home Care Services

  
\_\_\_\_\_  
Date