

Exhibit 14

Boyd K. Rutherford
Lt. Governor

Larry Hogan
Governor

Sam Abed
Secretary

September 14, 2017

Diane Stollenwerk, MPP
Commissioner/Reviewer
Maryland Health Care Commission
4160 Patterson Avenue
Baltimore, Maryland 21215

RE: Application of Seasons Residential Treatment Program, LLC to Establish a Residential Treatment Center Docket No. 14-16-2357

Dear Ms. Stollenwerk:

In response to a January 17, 2017 letter I received from the Commission concerning the application of Seasons Residential Treatment Program, LLC ("Seasons") for Certificate of Need ("CON") approval, below are the answers to your specific questions:

1. How accurate is the above statement from Seasons' CON application regarding the Department of Juvenile Services and, if known, other relevant Maryland agencies?
The current Maryland RTC providers are serving DJS youth and, with the re-purposed RTC beds at Chesapeake Treatment Center (CTC), there is not a projected need for an additional 72 bed RTC for DJS youth.

2. What is DJS' position on the adequacy of RTC services to meet the needs of the population it serves who need such services? *It is adequate.*
Please address:

(a) The overall adequacy of supply compared to demand for RTC services in general. It would be most helpful if you could provide supporting data.
As of 9/14/17 DJS currently has 90 youth in Maryland RTC placements - 71 males and 19 females.

(b) Are in-state RTC providers required to admit all referrals from state agencies for RTC services for the gender and age group served by that provider? *No.*
If no, what are the criteria and circumstances under which a RTC provider can refuse a referral?
Aggressive behavior beyond what the program can manage, AWOL risk, low IQ, nature of offense, age (18 and older)

(c) What is the availability of in-state programs that meet the needs of youth served by DJS who require specialized RTC care as described in the first paragraph above? *There is adequate space.*

(d) What is the adequacy and proximity of the supply of out-of-state RTC services to meet the needs of the segments of youth not being met by in-state providers? *DJS has contracts with four (4) out-of-state RTC providers in Virginia, Georgia, Florida and Arizona. DJS currently has seven (7) youth (females) in out-of-state RTCs located in Virginia, Georgia and Florida.*

3. How many females and males aged 13-17, and males aged 18-to-21 in DJS custody were in out-of-state RTCs as of January 31, 2016? *Five (5)*

(a) Do you consider that number representative of a typical day? If not, please provide data that is more representative, ideally stratifying DJS's RTC population by type of facility and programmatic needs. *Yes, this is typical for out-of-state RTC placements within the last two years.*

(b) What percentage of these youth received care in an RTC in a neighboring state (DC, PA, DE, VA, WV) versus all other states? *Page 152 of the FY2016 Data Resource Guide <http://djs.maryland.gov/Pages/Data-Resource-Guides.aspx> gives a representative number of admissions and average population for the RTC programs out of state. There was an average population of just over six youth for the most recent year. None were in the states listed as neighboring states.*

(c) Would the placement needs of any of these youth be met by the recently approved programmatic change at hardware-secure Chesapeake Treatment Center? If so, what proportion? *Yes. 80%*

(d) In its FY2015 Out-of-home Placement Report and Family Preservation Resource Plan, DJS cited support for DJS capital projects to ensure that sufficient in-state secure slots are available for high-risk committed youth as a strategy for improving the efficiency and effectiveness of the State network. Please describe any such capital projects that are in planning stages that you expect will affect the need to send committed youth out-of-state for RTC services. *None. The DJS Capital Plan does not address RTC beds.*

(e) What are the attributes of programs needed for youth currently being sent out-of-state for RTC placement that would not be met by the program change at Chesapeake Treatment Center or DJS capital projects for which appropriated? *DJS places a small number of females in out-of-state RTCs and the needs of this small population are specialized and dynamic.*

If possible, please include the number of youth and programs needed and any other information that could be helpful, such as citations or copies of regulatory requirements or guidelines for such programs. *None.*

Please let me know if further information is needed.

Sincerely,



Sam Abed
Secretary

cc: Michael Ito, Psy.D.
Suellen Wideman, AAG
Shelly Mintz, AAG, Deputy Counsel, DJS





February 15, 2017

Diane Stollenwerk, MPP
Commissioner/Reviewer
Maryland Health Care Commission
4160 Patterson Avenue
Baltimore, MD 21215

Re: Response for Application of Seasons Residential Treatment Program, LLC
to Establish a Residential Treatment Center
Docket No. 14-16-2357

Dear Commissioner Stollenwerk,

In response to your request for the Department of Human Resources (DHR) view on the need for additional residential treatment services in the State of Maryland. Please see the responses below.

1. How accurate is the above statement from Seasons' CON application regarding the Department of Human Resources and, if known, other relevant Maryland agencies?

Response: DHR is always looking for additional provider resources to service the youth entrusted to our care. Based on the information that Seasons Residential Treatment has provided, their program will offer services to youth in Maryland in a jurisdiction where there is a service gap.

2. What is DHR's position on the adequacy of RTC services to meet the needs of the population it serves who need such services? Please address:

(a) The overall adequacy of supply of RTC services in Maryland compared to demand for RTC services. It would be most helpful if you could provide supporting data.

Response: Data for youth placed in RTC Placement by DHR per fiscal year.

November 31, 2016 - 140

FY2016-June - 143

FY2015-June - 170

FY2014-June - 190

There are currently six (6) RTC providers located in Maryland. Based on location- four (4) are located in Baltimore City, one (1) in Baltimore County and one (1) in Frederick, MD. Two programs that were located in close proximity to the site identified by Seasons will be closing in FY17. The two programs were located in Montgomery County. Although there is ample supply of beds, the beds are not located in the Southern, MD region.

(b) Are in-state RTC providers required to admit all referrals from state agencies for RTC services for the gender and age group served by that provider? If no, what are the criteria and circumstances under which a RTC provider can refuse a referral?

Response: No. Many RTC providers reject referrals based on their ability to meet the needs of the youth. Some of the contributing factors to rejections are as follows; developmental disabilities, severe aggression, sexualized behaviors, severe self injurious behaviors, and juvenile delinquency. These rejections often lead to the youth being placed out -of -state.

(c) What is the availability of in-state programs that meet the needs of youth served by DHR who require specialized RTC care as described in the first paragraph above?

Response: When a youth qualifies for an RTC placement, the RTC has indicated that they are able to meets the needs of said youth and that there is an available bed in the state. Currently, all of the RTC's in Maryland have vacancies. DHR receives a vacancy report from the Maryland RTC Coalition on a regular basis.

(d) What is the adequacy and proximity of the supply of out-of-state RTC services to meet the needs of the segments of youth not being met by in-state providers?

Response: DHR contracts with many different providers in the country. There are currently contracts with RTC's in eight different states (e.g. FL, TX, MA, VA, GA, SC, PA, and NJ). Although the youth are receiving adequate care in the out- of -state placements, DHR believes that the youth would best be served in- state with a provider that can treat their unique needs.

3. How many females and males aged 13-17, and males aged 18-to-21 served by DHR were in out-of-state RTCs as of January 31, 2016?

Response: Overall, we had 36 youth aged 13-21 in an OOS RTC placement as of January 31, 2016. Of that group, 25 were males and 11 were females ages 13-17. Thirteen males of that same grouping were aged 18-21.

(a) Do you consider that number representative of a typical day? If not, please provide data that is more representative, ideally stratifying DHR's RTC population by type of facility and programmatic needs.

Response: Yes, referrals received vary from day-to-day. The local department only seeks technical assistance with OOS placement after all other in-state providers have been exhausted.

(b) What percentage of these youth received care in an RTC in a neighboring state (DC, PA, DE, VA, and WV) versus all other states?

Response: 94% (19 in Delaware, 3 Pennsylvania)


(c) What are the attributes of programs needed for youth currently being sent out-of-state for RTC placement? If possible, please include the number of youth and programs needed and any other information that could be helpful, such as citations or copies of regulatory requirements or guidelines for such programs.

Response: Referrals for children for out-of-state-placement include the following behaviors:

- Sexual offenders
- Developmentally Disabled
- IQ's of 70 and below
- Medically Fragile
- Highly Aggressive
- Self-Injurious

If you have further questions regarding the responses provided, please contact Tennille Thomas, SSA Chief of Staff at 410-767-7754 or Tennille.Thomas@maryland.gov.

Sincerely,



Gregory S. James
Deputy Secretary of Operations

CC: Ann Flagg
Rebecca Jones Gaston