# Exhibit 31

September 11, 2017

Mr. Kevin McDonald
Chief
Certificate of Need Division
Center for Health Care Facilities Planning & Development
Maryland Health Care Commission
4160 Patterson Ave.
Baltimore, MD 21215

Dear Mr. McDonald,

As the recently retired Nonpublic Special Education Section Chief, for the Maryland State Department of Education, I submit this letter of support to expand local options for safe, secure residential treatment and educational programming for children, young adults and families within the great state of Maryland.

Specifically, I support Seasons Residential Treatment Program based on their plan to build a program for youth with severe behavioral and mental health challenges in need of a safe, secure therapeutic milieu and intensive round the clock clinical oversight. This residential program will also meet Maryland Special Education Nonpublic School approval requirements and provide educational services to the residents as well as day options for students who live in the surrounding communities.

I am excited about the proposal to bring a new-to-Maryland certified Psychiatric Residential Treatment Facility and nonpublic special education school to the southern region of Maryland. The proposal is specific to the current needs of Maryland youth that are typically placed out-of-State or have experienced failed placements with the existing Maryland providers. This includes children victimized and traumatized by sex trafficking, youth with histories of fire setting, and youth with dual diagnosis. All three of these behavioral and difficult profiles are underserved or not served at all by Maryland's current Residential Treatment Centers (RTC). I am thrilled to support a program dedicated to offering intensive clinical services meeting the current needs of Maryland youth, as well as providing an alternative to the existing RTC facilities located in an area of the State that is underserved.

For more than twenty years, I worked closely with Maryland RTCs and residential facilities located in other states. I have monitored and supervised placements as well as monitored, approved and set rates for nonpublic schools offered by Maryland RTCs and out-of-State facilities. In addition, I have sat as a member of Baltimore County Local Coordinating Council (LCC) and the State Coordinating Council (SCC). These professional responsibilities have provided me with first-hand knowledge of the challenges for the facilities, challenges of placing youth and outcomes for Maryland's children and families.

Currently Maryland is facing a lack of intensive planned and coordinated treatment resources that can effectively meet the residential needs of all Maryland youth. Over the past years Maryland RTC resources have dwindled, beginning with the forced closure of facilities for failure to provide quality and safe services, followed by the State's closure of the Regional Institute for Children, Southern Maryland. Within the 2017

fiscal year, Adventist Behavioral Health Systems choose to close its two programs and Good Shepherd Center has also elected to close. A number of factors resulted in these closures; lack of need for the resources was not one. These recent closures have provided a dramatic void in the opportunities for Maryland youth and at the same time has opened the door for a new and fresh look at Maryland's approach to residential psychiatric treatment.

Maryland's interagency collaborative goal is to serve all of its youth within the State. Commitments to keep children as close to families as possible, concerns for effective monitoring of the safety of the children while out-of-state, and the expectation to utilize Maryland's fiscal resources for direct children's services as opposed to out-of-State staff travel are just a few factors that support the State's motivation for serving all of its children within State.

As a career special educator dedicated to the needs of Maryland youth, I am hopeful the proposed Season's program will provide a different approach to treatment and programming that compliments but does not duplicate the current RTC programs that are in place. Maryland's established and currently operating treatment programs utilize the same methodologies. When a youth fails in one program, they are unlikely to succeed in another. This results in multiple failed placements, poor outcomes for children and families and ultimately out-of-State placements. Seasons' philosophy and approach will provide much needed diversity to the Maryland residential treatment world. I also hope this program will lead to greater collaboration with community-based providers and eventually reduce the overall number of youth in need of this level of care.

The location of Seasons Residential Treatment Program in southern Maryland will provide much needed nonpublic school resources to this part of our State. Currently day students are spending multiple hours a day traveling to their assigned nonpublic schools. Nonpublic school providers typically look for high volume need in order to open a cost effective day school program. The need generated by both the day students and residential youth will provide the volume necessary for Seasons to operate a cost effective nonpublic school. In addition, Seasons is committed to meeting the instructional needs of the community and working closely with the local school systems. This will negate some of the challenges past providers have had in the area.

I look forward to news that Maryland is able to offer new and innovative options for your youth who require residential treatment. Please do not hesitate to contact me if you need any additional information, or have further questions. I can be reached by phone at (443)250-3637, or by email at <a href="mailto:Cynamirault@gmail.com">Cynamirault@gmail.com</a>. Thank you for your commitment to Maryland's children with special needs and their families.

Sincerely,

Synthia Amirault, M.S. Ed.

## Joseph W. LaFleur, MSW, MBA, LICSW 3 Washington Circle NW, Ste. 406 Washington, DC 20037

August 30, 2017

Mr. Kevin McDonald Chief Certificate of Need Division Center for Health Carc Facilities Planning & Development Maryland Health Care Commission 4160 Patterson Ave. Baltimore, MD 21215

Dear Mr. McDonald,

As a Licensed Clinical Social Worker and former director for Beacon Health Strategics, the former Medicaid Managed Care Organization in Washington, DC, I submit this letter of support to expand local options for safe, secure residential treatment programming for children, young adults and families.

Specifically, I support Seasons Residential Treatment Program based on their plan to build a program for youth with severe behavioral and mental health challenges in need of a safe, secure therapeutic milieu and intensive round the clock clinical oversight.

I am excited about the proposal to bring a certified Psychiatric Residential Treatment Facility to the area for the following reasons: availability of intensive clinical services, ability to decrease lengths of stay (and related costs) and the possibility of improving reintegration outcomes for youth and families.

For more than 10 years, I worked closely with providers and placing agencies to support federal (Mcdicaid) funding for District of Columbia youth whose behavioral health care needs exceeded the options available in lower levels of care (i.e., group homes and residential treatment centers).

Very often, youth were placed in programs far from home because there is an absence of available local options for youth with severe trauma and behaviors. If Seasons is certified as a PRTF, the clinical standard and rigor of the therapeutic program will match the placement needs for many "tough to treat" youth in our area.

The proximity of Seasons and ability to youth in Maryland, Virginia and Washington, D.C., will allow greater access to families and encourage effective discharge planning early in the treatment process. If the program can identify resources and engage parents and guardians early, I believe we can reduce the amount of time youth spend in this level of care and improve clinical outcomes.

- Continued -

## Joseph W. LaFleur, MSW, MBA, LICSW 3 Washington Circle NW, Ste. 406 Washington, DC 20037

As a clinician, I am hopeful the proposed program will also lead to greater collaboration with community-based providers and eventually reduce the overall number of youth in need of this level of care. Until then, I strongly support the need for this program and level of care.

Please do not hesitate to contact me if you need any additional information, or have further questions. I can be reached on 202.641.5335, or, Joseph@DistrictCounseling.com.

Sincerely

COMMUNITY COLLEGE PREPARATORY ACADEMY 2405 Martin Luther King, Jr. Avenue, SE, Washington, DC 20020 (202) 610-5780 Phone, (866) 372-7778 Fax website: www.ccprep-academy.org



6 September, 2017

Kevin McDonald Chief, Maryland Health Care Commission Center for Health Care Facilities Planning and Development 4160 Patterson Avenue Baltimore, Md. 21215

Dear Mr. McDonald

I am pleased to write in my continued support for the Seasons Residential Treatment Program that has undertaken the process of seeking approval for the development of a mental health facility in your jurisdiction. I have known the founding Director, Ms. Ty Johnson professionally as a result of my 40 year career in the District of Columbia as an educator and Workforce Development specialist. I am also aware of her deep commitment to young people with special needs and the broad range of both experience and knowledge of the field that she brings to such an endeavor.

As the Executive Director of a Charter School for adults here in Southeast Washington, I am confronted every day with the young adults for whom adequate and appropriate mental health services have not been provided. As you are no doubt aware, they are a regional challenge because they shift from the East section of the city to Prince Georges' County and back on a regular basis. I can only believe that such a facility has the potential to serve both jurisdictions by providing a responsive and thorough programs and services for young people that resolves learning and socialization barriers early on. Moreover, it provides a bridge to programs like mine.

I continue to believe that this type of facility could be beneficial to both our communities. Certainly, both communities currently suffer from the lack of appropriate, effective mental health and substance abuse programming that supports young people in re- entering the community with the skills and supports to successfully transition. I am certain that we can both attest to the dire lack of such comprehensive services within our region- particularly focused on minority mental health issues.

As a result of the current referral process, such a nearby center would allow young people from both the county and the city to benefit from placements at a facility that is equipped to meet their diverse mental, emotional and substance abuse related challenges. Further, such a Center would allow the mental health provider to stay in close contact with families and provide the needed support for effective exit transition. Also, with parent permission, the facility could work with nearby school staff to ensure seamless transition back to school.

I can only see a benefit for the County and the Region from such a facility. As I indicated previously, every day I see the results of ineffective mental health support systems that are often located too far from the area where the client must return- thus making effective transition almost impossible.

I sincerely hope that every consideration will be given approving this unique and much needed resource for both our communities.

C Vannessa Spinner

Executive Director/ Head of School

Community College Prep Academy Public Charter School



# PRINCE GEORGE'S COUNTY GOVERNMENT

## OFFICE OF THE COUNTY EXECUTIVE

September 7, 2017

Mr. Kevin McDonald, Chief
Certificate of Need Division
Center for Health Care Facilities Planning & Development
Maryland Health Care Commission
4160 Patterson Ave.
Baltimore, MD 21215

Dear Mr. McDonald,

I write in support of the application of Seasons Residential Treatment Program for a Certificate of Need to provide residential treatment for youth between the ages of 13 and 21 with a diagnosis of mental illness.

As part of our overall focus and commitment to providing access to quality and affordable healthcare for Prince George's County residents, we support the need for more mental health services for youth and families and have identified specific goals for at-risk youth with behavioral health challenges. If approved, Seasons Residential Treatment Program would be part of a system of care for youth with severe behavioral problems in need of interventions and treatment superior to what we can provide in our community-based programs.

Currently, there are no residential or secure inpatient assessment beds for adolescents and young adults (under the age of 21), in Prince George's County, or neighboring south counties. Many of our young residents are placed in residential programs and assessment units well beyond a reasonable distance for families to participate in treatment. We strongly believe if Seasons Residential Treatment is approved, the program will extend our ability to provide needsbased services to County residents and will support successful community, school and family reintegration.

We support this application because we believe the program will extend our ability to more effectively and efficiently promote the health, safety and well being of children and families in Prince George's County. Please do not hesitate to contact me if you need additional information in support of this application.

Sincerely,

Betty Hager France

Deputy Chief Administrative Officer for Health, Human Services and

Education

14741 Governor Oden Bowie Drive, Upper Marlboro, Maryland 20772 (301) 952-4131 www.princegeorgescountymd.gov



# National Collegiate Preparatory Public Charter High School

August 31, 2017

Kevin McDonald Chief, Maryland Health Care Commission Center for Health Care Facilities Planning and Development 4160 Patterson Ave Baltimore, Md. 21215

Dear Mr. McDonald:

It had come to my attention that the Seasons Residential Treatment Program has expressed an interest in locating a mental health facility in our community. I believe this type of facility could be beneficial to our community. There is a lack of such services within our community which often affects our community in a negative manner. Further, because of the lack of services within the area, often times students need to be transported out of our community for their needed treatment. This creates stress on families because their children are not close enough to visit and it is difficulty to bring family together to support the child.

If the treatment were available in our community, the mental health provider could stay in close contact with the family and provide the needed support. Also, with parent permission the facility could work with school staff to help with the transition back to school.

I thank you for the consideration as I believe the Seasons Residential Treatment program would be a true asset to the community.

Best,

Jennifer L. Ross MSW, LCSW Founder & Executive Director

National Collegiate Preparatory PCHS



September 12, 2017

Ty Johnson, CEO Seasons Residential Treatment Program 145 Fleet Street National Harbor, MD 20745

Dear Ms. Johnson:

I am writing this letter to offer my strong support of Seasons Residential Treatment Program certificate of need application to operate a Residential Treatment Program in Prince George's County. This program will help fill a much needed service gap in the District of Washington and the State of Maryland.

Psychiatric Institute of Washington (PIW) is a short-term, acute care hospital. We provide comprehensive behavioral healthcare for children, adolescents and adults that have mental health and addictive illnesses. PIW will work with Seasons Residential Treatment Program by providing no-cost assessments for level of care to any resident referred to our facility by Seasons Residential Treatment Program as well as provide inpatient clinical services when appropriate. Additionally, PIW will collaborate with Seasons Residential Treatment Program on projects and initiatives in the community at large to promote mental health and awareness.

It is with much enthusiasm that the Psychiatric Institute of Washington pledges its support of Seasons Residential Treatment Program application.

Sincerely,

Dina Levi, LPC, NCC

Director, Business Development Psychiatric Institute of Washington 4228 Wisconsin Avenue, N.W.

Washington, D.C. 20016 Office: 202-885-5668

Email: Adina.Levi@uhsinc.com

The Psychiatric Institute of Washington 4228 Wisconsin Avenue, N.W. • Washington, DC 20016 • (202) 885-5600 www.psychinstitute.com



Gloria Brown Burnett Director



Department of Human Services
Prince George's County Department of Social Services

September 13, 2017

Ty Johnson, CEO Seasons Residential Treatment Program 145 Fleet Street National Harbor, MD 20745

Dear Ty Johnson,

Prince George's County Department of Social Services (PGCDSS) is writing in support of Seasons Residential Treatment Program Certificate of Need application for their opening of a residential treatment program within Prince George's County. PGCDSS currently cares for over 480 youth in out of home care who reside in various placement settings. Over the last nine years as we have focused on improving outcomes under the Place Matters initiative, we have continued to have a number of youth who require high intensity level placements, including Residential Treatment Centers (RTC) and hospitalizations. Most of these placements are not within or close to Prince George's County which creates barriers to family engagement and step down services. Seasons RTC opening a facility in Prince George's County will better support the best practice of their families maintaining regular therapeutic engagement and supporting discharge planning that is community-based focused.

PGCDSS is a strong supporter of the State's efforts of ensuring all youth are placed within Maryland when possible. Over my seven year tenure as director, I have seen that some of our youth have had to utilize out of state placements due to their complex needs and diagnosis. We are pleased to see that Seasons seeks to "provide intensive, structured residential programming and inpatient care to 'tough to treat' children, adolescents and young adults suffering from serious behaviors and mental illness." Many of our toughest to place youth fit this description with multiple diagnosis such as mental illness, developmental delays, and assaultive behavior. These issues often lead to multiple rejections by programs unable to manage all three needs or those that can, are unable to due to bed space.

Having the additional programming from Seasons will support youth's ability to stay within their home community, maintain important therapeutic connections, and ensure that their needs are met by appropriate treatment options is a welcomed program by PGCDSS. Should you have additional questions, please feel free to contact me.

Sincerely,

Gloria Brown Burnett

Director





# THE PRINCE GEORGE'S COUNTY GOVERNMENT

# Department of Family Services

September 13, 2017

Maryland Health Care Commission c/o Kevin McDonald Chief, Certificate of Need 4160 Patterson Avenue Baltimore, MD 21215

Dear Mr. McDonald:

On behalf of the Department of Family Services, I am pleased to write this letter of support for the Seasons Residential Treatment Program.

The goal of this program would be to provide three separate programming components: A high-intensity residential program, a shorter-term diagnostic/assessment program, and a program for older youth between the ages of 18 and 21. All of the program components are designed to support the mental and behavioral health needs of male and female residents between 13 and 21 years or age who have a history of mental illness and co-occurring disorders.

Due to the limited number of residential treatment centers in Maryland and the fact that there are currently no residential treatment centers for adolescents in Prince George's County, the need is apparent. This treatment facility will provide a residential placement within the county, so that youth who need this level of care could remain in their community instead of being placed in other parts of the state or out of state. Understanding that it is usually preferable to keep a child within their family unit and a part of their community, there may be times when residential treatment is necessary. A residential treatment facility within Prince George's County would allow families to remain in close proximity to the adolescent thus easing the burden on the family and on the youth. Additionally, this would create an opportunity for more frequent visits and for the family to be an integral part of the child's treatment. Studies indicate keeping youth closer to their communities improves their treatment outcomes.

In closing, Seasons Residential Treatment Program is committed to making sure youth have what they need to succeed and are able to achieve their short and long-term goals.

Respectfully,

Elana Belon-Butler

Director

Harriet Hunter Building – 6420 Allentown Road, Camp Springs, MD 20748 (301) 265-8401 (VOICE) • (301) 248-0716 (FAX) • 711 Maryland Relay Service

STATE OF MARYLAND



LAWRENCE J. HOGAN, JR.

#### OFFICE OF THE PUBLIC DEFENDER

DISTRICT ONE – BALTIMORE CITY
JUVENILE COURT
300 NORTH GAY STREET, 2<sup>ND</sup> FLOOR

BALTIMORE, MARYLAND 21202 Ph. (443) 263-6360 Fax (443) 263-6395 Toll Free: 1 (877) 430-5187 PAUL B. DeWOLFE

Becky Feldman

Kirsten Downs

Deborah St. Jean

September 20, 2017

Mr. Kevin McDonald Chief Certificate of Needs Division Maryland Health Care Commission 4160 Patterson Avenue Baltimore, Maryland 21215

Re: Letter of Support for Seasons Residential Treatment Program

Dear Mr. McDonald:

As the former Director of the Juvenile Protection Division of Maryland State Public Defender, we were tasked with monitoring the conditions of confinement for our clients to ensure that they were getting the services the juvenile court ordered. This mandate occasioned that we visit and monitor our clients committed to the Department of Juvenile Services for placement in residential treatment centers (RTC's) both in and out of state. Over the past 11 years I have had multiple visits to youth placed at the Adventist RTCs, the RICAs, Good Shepherd, Woodbourne, The Jefferson School and Shepherd Pratt. As I am sure you are aware, Maryland youth with significant mental health diagnoses can no longer attend either the Adventist RTCs or Good Shepherd. Suffice to say these facilities have had a number of problems over their years of service culminating in the decision to stop taking patients. The closure of these facilities has occasioned a gap in service provision for these emotionally disturbed youth. In the delinquency forum, often these Maryland youth are sent out of state to obtain the necessary services. The Seasons Residential Treatment Program would fill this gap in services and allow our Maryland youth to remain close to home. Family participation is crucial to successful re-entry.

Seasons programming for young adults ages 18-21 will fill another large service gap. Many if not all the above referenced RTCs will not admit this age group. This group of youth are often without a viable placement and necessary treatment to prevent their transfer to adult court jurisdiction and ultimately the adult Division of Corrections. Seasons can provide the court with a treatment option such that the youth can remain within the juvenile court jurisdiction.

I am fully supportive of granting Seasons Residential Treatment Program the appropriate licensing and certifications to begin filling this large service gap.

Very truly yours,

Deborah St. Jean

Chief Attorney – Juvenile Division Baltimore City Public Defender



September 21, 2017

Mr. Kevin McDonald Chief Certificate of Need Division Maryland Health Care Commission 4160 Patterson Avenue Baltimore, MD 21215

Dear Mr. McDonald:

I am writing to offer support of the Seasons Residential Treatment Program Certificate of Need application to operate a Residential Treatment Center in Prince George's County. This program will help fill a much needed service gap for children and young adults between the ages of 13 and 21 in need of more long-term therapeutic care.

The University of Maryland Prince George's Hospital Center provides short-term, inpatient hospitalization for adults with acute behavioral health care needs. If the program is approved and licensed to operate, we would consider referring appropriate patients in need of residential treatment to their care and would receive patients who present with more immediate and acute needs to our hospital.

We look forward to working with Seasons Residential Treatment Program and expanding access and education to residents in need of behavioral health care support and resources.

Should you have any question, please feel free to contact me.

Sincerely,

Neil J. Moore, MBA, MPH, MPA

President and Chief Executive Officer

University of Maryland Capital Region Health



# PRINCE GEORGE'S COUNTY GOVERNMENT

#### OFFICE OF THE COUNTY EXECUTIVE

September 5, 2017

Kevin McDonald, Chief Certificate of Need Division Maryland Health Care Commission 4160 Patterson Avenue Baltimore, Maryland 21215-2299

RE: Letter of Support – Seasons Residential Treatment Program

Dear Mr. McDonald:

As the Deputy Chief Administrative Officer for Public Safety, I would like to offer this Letter of Support for Seasons Residential Treatment Center to build and operate a new 72-bed children's, youth and young adult's facility in Prince George's County, Maryland. There are many areas that would have a positive affect by the presence of a secure, therapeutic living environment for youth that have a history of serious health or behavioral challenges. Prince George's County can also benefit from a treatment program that addresses issues of mental health and substance abuse.

It is my goal and the goal of the various public safety agencies under my authority, to keep our residents and citizens safe. A program, like the one proposed by Seasons Residential Treatment, would be another resource to ensure that young people have access to the kinds of interventions needed to protect their safety and the safety of others. I support programs interested in partnering with local law enforcement officers to help build awareness, education and reduce the stigma of mental illness and related disorders.

I support Seasons Residential Treatment Program because I believe the facility will help promote mental and public health in the community, provide more supervised care and lessen the burden on our correctional facilities and law enforcement officers. If I can be of further assistance or provide additional information, please do not hesitate to contact my office at 301-952-4758.

Sincerely,

Mark A. Magaw

Deputy Chief Administrative Officer

Mark A. Mejan

for Public Safety



### PRINCE GEORGE'S COUNTY POLICE DEPARTMENT

FIRST TO SERVE SINCE 1931 7600 BARLOWE ROAD

PALMER PARK, MARYLAND 20785



September 5, 2017

Mr. Kevin McDonald, Chief Certificate of Need Division Center for Health Care Facilities Planning & Development Maryland Health Care Commission 4160 Patterson Avenue Baltimore, MD 21215

Dear Mr. McDonald:

I am writing to express my support of Seasons Residential Treatment Program. The proposed 72-bed residential treatment center is a greatly needed resource to help serve the needs of children and young adults with severe behavioral and mental health challenges living in Prince George's County.

Unfortunately, like most cities and counties around the country, mentally ill people who commit minor crimes often end up languishing in jails and detention facilities poorly equipped to handle their illnesses. By having additional resources available, the police department can direct residents to appropriate behavioral health services and treatment often preventing additional agency involvement and public safety challenges.

In order to effectively respond to the mental health challenges of the community, we need local partners like Seasons Residential Treatment Program in the public health sector. The agency places a high priority on the behavioral health of Prince George's County residents and currently has a shortage of local placement resources for those in need of a safe and structured environment where treatment is the priority.

We support the need for the residential treatment center proposed by Seasons Residential Treatment Program because it would be a benefit to some of the most vulnerable residents in Prince George's County and neighboring counties.

If I can be of further assistance, please do not hesitate to contact my office at 301-772-4740.

Sincere

Henry P. Stawinski III

Chief of Police



Office of the Health Officer

Mr. Kevin McDonald, Chief Certificate of Need Division Center for Health Care Facilities Planning and Development Maryland Health Care Commission 4160 Patterson Avenue Baltimore, MD 21215

Dear Mr. McDonald,

This letter is in support of the application for a Certificate of Need to provide residential treatment services for adolescents (male and female) and young adults aged 18-21 years by Seasons Residential Treatment Program, LLC; a wholly-owned subsidiary of Strategic Behavioral Health, LLC.

Given the lack of residential treatment facilities in Prince George's County, this application provides significant benefit to families in this county in the following ways:

- Facilitates family involvement in the assessment and treatment process and thereby promotes family support and re-unification post-treatment.
- More likely to contribute to successful transition and re-integration of children and youth into the community
- Decreases time and costs associated with travel for family members if the youth is placed out-ofstate and in state if placement is Baltimore and Rockville RTC sites to participate in the treatment process, discharge planning and functioning as a visiting resource to the youth.
- Expands and enhances the continuum of services available to our families.

While community-based treatment options are preferential, Seasons is proposing to serve populations that are difficult to serve and needs a more intensive level of care. In addition, they are also proposing to meet a need for which services are not currently available. This includes youth who also have co-occurring developmental issues and autism spectrum disorders, youth who are between the ages of 18-21 years. In addition, the utilization of a pre-placement assessment and diagnostic evaluations is commendable.

In summary, the Prince George's County Health Department supports this application because it provides the necessary treatment and support to families with children who are experiencing significant behavioral health challenges while enabling the family to remain connected during the treatment process.

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Sincerely,

Pamela B. Creekmur

ame la B. Geelm

Health Officer









