



7008 Security Boulevard
Suite 300
Windsor Mill, Maryland 21244-2504
410-594-2600
1-888-523-5000
www.vnamd.com

May 2, 2017

Ruby Potter, Administrator
Maryland Health Care Commission
Center for Health Care Facilities
Planning & Development
4160 Patterson Avenue
Baltimore, MD 21215

RE: CON Application to Expand a Home Health Agency in Upper Eastern Shore - Docket
No. -17-RI-2393

Dear Ms. Potter:

Enclosed are six copies of the Applicant's Responses to the Completeness Questions dated
April 6, 2017 for filing in the above-referenced case.

Should you have any questions, please let me know. Thank you for your attention to this
matter.

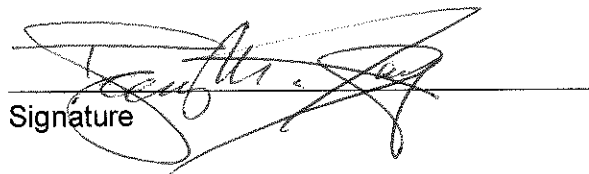
Sincerely,

Barry M. Ray
CEO, Visiting Nurse Association of Maryland, LLC



7008 Security Boulevard
Suite 300
Windsor Mill, Maryland 21244-2504
410-594-2600
1-888-523-5000
www.vnamd.com

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.


Signature

May 2, 2017
Date:

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FINANCIAL ACCESSIBILITY

1. Please provide a copy of VNA's current license and Medicare and Medicaid certifications.

Applicant Response: A copy of the VNA's current license and Medicare and Medicaid Certifications are attached as Attachments N and O.

CHARITY CARE AND SLIDING FEE SCALE

2. Please provide a draft of the documents that will be published annually and describe how they will be promulgated.

Applicant Response: Upon approval of the certificate of need for the Upper Eastern Shore Jurisdiction, VNA will publish on its website the following statement to be found under Frequently Asked Questions, asking "Do you provide for charity care and/or financial assistance?" The answer will be as follows, "The VNA of Maryland has a policy in place that provides for charity care and financial assistance for those who qualify based on their financial condition. If you have financial hardship, please contact the VNA of Maryland and one of our financial analysts will be in contact within two (2) business days."

3. For the record, please provide a source for Chart 1 on p.15.

Applicant Response: The source for Chart 1 on p.15, 2014 Home Health Agency Charity Visits is located on:

http://mhcc.maryland.gov/public_use_files/homehealthdownload.html, Home Health 2014 Zipped Comma Delimited Files and Documentation, hh_2014_jur_data.csv, Question 31B in Column CZ.

FINANCIAL FEASIBILITY

4. Assumptions driving the financial projections were referenced on p. 17 as being "found in table 4," but did not appear anywhere. Please outline your assumptions affecting volumes, revenues, costs, etc.

Applicant Response: The assumptions driving the financial projections are strictly driven by census and census growth. As such, staffing and operational costs are derived by the number of patients we will serve. As census grows, the associated costs will increase as well. We expect growth in the upper Eastern Shore region to be similar to our experience in Cecil County and parts of Maryland, where we have started services without any real prior presence in those counties.

IMPACT

5. If you have a data or literature source to support the anecdotal statement that, "...more residents are choosing to age at home as opposed to an institutional setting," please provide it.

Applicant Response: The support data is found through research by AARP: American Association of Retired People, page 2 of AARP research paper entitled, "Home and Community Preferences of the 45+ Population."
<https://assets.aarp.org.rgcenter/geenral/home-community-services-10.pdf>

FINANCIAL SOLVENCY/ VIABILITY OF THE PROPOSAL

6. The Financial Solvency standard requires an applicant to "demonstrate an applicant's ability to comply with the capital reserve and other solvency requirements specified by CMS for a Medicare-certified home health agency." HHS 489.28(d) requires "proof...will include a copy of the statement(s) of the HHA's savings, checking, or other account(s) that contains the funds, *accompanied by an attestation from an officer of the bank or other financial institution that the funds are in the account(s) and that the funds are immediately available to the HHA.*"

...And the VIABILITY criterion asks for audited financial statements for the past two years, or, "in the absence of audited financial statements, documentation of the adequacy of financial resources to fund this project in the form of a letter stating such signed by a Certified Public Accountant who is not directly employed by the applicant."

In response to this standard and criterion VNA provided, respectively, a page from its bank statement, and unaudited financial statements. In order to satisfy these two items, please provide: either an attestation from an officer of the bank or financial institution that the funds are in the account and that the funds are immediately available to the HHA; or the aforementioned letter from an independent CPA.

Applicant Response: A copy of a letter from The Private Bank is included in Attachment P.

LINKAGES WITH OTHER SERVICE PROVIDERS

7. The applicable part of this standard requires VNA to provide documentation of linkages in its existing service area and to document its work in forming such linkages before beginning operation in each new jurisdiction it is authorized to serve. Accordingly, please describe the nature of the existing relationships with a representative range of other provider organizations that you may share

patients with (e.g., refer to, receive referrals from, etc.). Perhaps the best documentation would be a concise letter – or email that you can excerpt into the application response ••from such care partners.

Applicant Response: Copies of email communications from partners have been submitted as part of Attachment Q.

VIABILITY OF THE PROPOSAL

8. For the record, please provide a source for the data shown in Chart 5 (p.25).

Applicant response: The source for Chart 5 p. 25, is the Home Health Utilization Tables #16 and #19 for calendar year 2011-2014 located on the Maryland Health Care Commission website:

http://mhcc.maryland.gov/public_use_files/homehealthdownload.html.

9. On Table 5, what does the data in the "Current No. of FTEs" column reflect? It should reflect data for all of VNA's Maryland operations. Please re-submit a Table 5 that does that.

Applicant Response: Attached is an updated Table 5 Staffing Information included as a section under Part IV: Home Health Agency Application: Charts and Tables Supplement, reflecting data for all of VNA's Maryland operations. Table 5 is included in Attachment R.

**List of Attachments N - R to Responses to April
6, 2017 Completeness Questions**

ATTACHMENT N



STATE OF MARYLAND
DEPARTMENT OF HEALTH AND MENTAL HYGIENE
OFFICE OF HEALTH CARE QUALITY
SPRING GROVE CENTER
BLAND BRYANT BUILDING
55 WADE AVENUE
CATONS VILLE, MARYLAND 21228

License No. HH7008

Issued to: VISITING NURSE ASSOCIATION OF MD, LLC
7008 Security Blvd
Baltimore, MD 21244

Type of Facility or Community Program: HOME HEALTH AGENCY

Date Issued: June 30, 2016

SERVICE PROVIDED:

SKILLED NURSING, HOME HEALTH AIDES, PHYSICAL & OCCUPATIONAL
THERAPY, SPEECH LANGUAGE PATHOLOGY, MEDICAL SOCIAL SERVICES
AND INFUSION SERVICES

AREAS SERVED:

BALTIMORE CITY, ANNE ARUNDEL, BALTIMORE, CALVERT, CARROLL,
CECIL, CHARLES, FREDERICK, HARFORD, HOWARD, PRICE GEORGE'S,
MONTGOMERY, ST. MARY'S, AND WASHINGTON COUNTIES

Authority to operate in this State is granted to the above entity pursuant to The Health General Article, Title 19
Annotated Code of Maryland, including all applicable rules and regulation promulgated there under. This document is
not transferable.

Expiration Date: June 30, 2017

Patricia Tompkins May, MD
Director

Falsification of a license shall subject the perpetrator to criminal prosecution and the imposition of civil fines.

ATTACHMENT O

CERTIFICATE of ACCREDITATION



ACCREDITATION COMMISSION FOR HEALTH CARE CERTIFIES THAT:

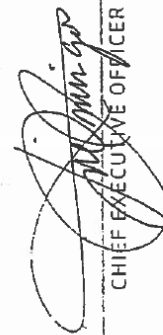
VNA of Maryland, LLC
BALTIMORE, MARYLAND

HAS DEMONSTRATED A COMMITMENT TO PROVIDING QUALITY CARE AND SERVICES TO CONSUMERS
THROUGH COMPLIANCE WITH ACHC'S NATIONALLY RECOGNIZED STANDARDS FOR
ACCREDITATION AND IS THEREFORE GRANTED ACCREDITATION FOR THE FOLLOWING:

HOME HEALTH

FROM *December 31, 2016* THROUGH *December 31, 2019*




CHIEF EXECUTIVE OFFICER


CHAIRMAN OF THE BOARD OF COMMISSIONERS

ACCREDITATION COMMISSION for HEALTH CARE

ATTACHMENT P



April 21, 2017

Visiting Nurse Association of Maryland

c/o Mr. Barry Ray

Re: Balances in DDA Accounts

Dear Mr. Ray,

As per your request, the average and available unencumbered and available balances in the accounts of Visiting Nurse Association of Maryland are above \$2,000,000.

If you have any questions please call me at the number below.

Regards,

Bluma Broner, MD

312-564-1222

120 South LaSalle Street • Chicago, Illinois 60603 • tel 312.564.2000 • ThePrivateBank.com

EQUAL HOUSING LENDER  MEMBER FDIC

ATTACHMENT Q

----- Original message -----

From: Valerie Semik <vsemik@scglenburnie.com>

Date: 4/17/17 10:19 AM (GMT-05:00)

To: Kathy Barnett <k.barnett@vnamd.com>

Subject: RE: from Kathy Barnett at the VNA

It definitely would!! I'm sure Dr. Sood would rather VNA take his patients on the Eastern shore. Now all we need is for you to go in-network with UHC! Haha.

Valerie Colosimo, RN, BSN

Nurse Administrator

SurgCenter of Glen Burnie

P-[410-760-8100](tel:410-760-8100)

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From: Kathy Barnett [<mailto:k.barnett@vnamd.com>]

Sent: Monday, April 17, 2017 9:18 AM

To: Valerie Semik <vsemik@scglenburnie.com>

Subject: from Kathy Barnett at the VNA

Hi Val,

I hope this email finds you well.

We are pleased to share that we have applied to become a home care provider on the Eastern Shore. The counties would include Kent, Caroline, Talbot and Queen Anne. If granted approval, would our expansion into these counties be helpful to the Surgery Center?

I am hoping you can provide some feedback to this question as we plan to meet the needs of the residents of these counties.

Have a great week!

Kathy

Kathy Barnett

Director, Community Relations

VNA Home Health of Maryland

cell:[443-829-9831](tel:443-829-9831)

fax:[410-594-2770](tel:410-594-2770)

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----- Original message -----

From: Hannah Kreidel <hkreidel@upperbaysurgery.com>

Date: 4/17/17 10:25 AM (GMT-05:00)

To: Kathy Barnett <k.barnett@vnamd.com>

Subject: RE: from Kathy Barnett at the VNA

Good Morning Kathy-

This is excellent news! This would be extremely helpful. The VNA is far superior than the other home health agencies we work with.

Hannah Kreidel RN, BSN, CNOR
Nurse Administrator
Upper Bay Surgery Center
360 E. Pulaski Hwy, Suite 2A
Elkton, MD 21921
(410) 620-3348
hkreidel@upperbaysurgery.com

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From: Kathy Barnett [<mailto:k.barnett@vnamd.com>]

Sent: Monday, April 17, 2017 9:22 AM

To: Hannah Kreidel <hkreidel@upperbaysurgery.com>

Subject: from Kathy Barnett at the VNA

Hi Hannah,

I hope this email finds you well.

We are pleased to share that we have applied to become a home care provider on the Eastern Shore. The counties would include Kent, Caroline, Talbot and Queen Anne. If granted approval, would our expansion into these counties be helpful to you and your patients? Your feedback would be most helpful as we plan to meet the needs of the residents of these counties.

Thank you Hannah,

Kathy
Kathy Barnett
Director, Community Relations
VNA Home Health of Maryland

cell:[443-829-9831](tel:443-829-9831)

fax:[410-594-2770](tel:410-594-2770)

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ATTACHMENT R

TABLE 5. STAFFING INFORMATION

Instructions: List by service the staffing changes (specifying additions and/or deletions and distinguishing between employee and contractual services) required by this project. FTE data shall be calculated as 2,080 paid hours per year. Indicate the factor to be used in converting paid hours to worked hours.

Position Title	Current No. of FTEs		Change in FTEs (+/-)		Average Salary		TOTAL SALARY EXPENSE	
	Agency Staff	Contract Staff	Agency Staff	Contract Staff	Agency Staff	Contract Staff	Agency Staff	Contract Staff
Administrative Personnel	107				\$70,500		\$7,543,500	
Registered Nurse	86				\$72,800		\$6,260,800	
Licensed Practical Nurse								
Physical Therapist	62				\$84,500		\$5,239,000	
Occupational Therapist	14				\$78,000		\$1,092,000	
Speech Therapist	3				\$104,000		\$312,000	
Home Health Aide	11				\$31,200		\$343,000	
Medical Social Worker	5				\$93,600		\$468,000	
Other (Please specify.)								
Benefits							\$3,149,713	
TOTAL							\$21,258,500	

Please note that the enclosed addendum to Table 5 represents current FTEs and average salaries for the entire agency as per the data taken from our 2016 cost report. The original Table 5 submitted represents only the current and expected additional staff needed for the Upper Eastern Shore Jurisdiction.