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May 19, 2020

Mr. Ben Steffen
Executive Director
Maryland Health Care Commission
4160 Patterson Avenue
Baltimore, Maryland 21215

Re: **Adventist HealthCare White Oak Medical Center:
Takoma Park Location
Request for An Emergency Certificate of Need**

Dear Mr. Steffen:

I am writing on behalf of Adventist HealthCare, Inc. d/b/a Adventist HealthCare White Oak Medical Center ("WOMC"), pursuant to the Maryland Health Care Commission ("Commission") regulations at COMAR 10.24.01.20 to request an emergency certificate of need ("ECON"). In this request, WOMC seeks to establish an alternate care site (ACS) with 200 MSGA hospital beds in Takoma Park.

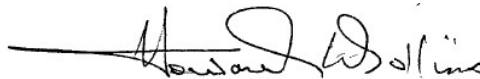
This request is prompted by the proactive steps initiated by Governor Hogan, Secretary Neal, the Commission and others to respond to COVID-19, pursuant to the state of emergency and catastrophic health emergency. In particular, on March 16, 2020, the Governor issued an Executive Order directing the Maryland Department of Health to work with health care facilities and providers to reopen closed hospital facilities across the state and to take other measures necessary to immediately increase statewide hospital capacity, in furtherance of the Governor's March 5, 2020 Proclamation declaring a state of emergency and catastrophic health emergency.

WOMC/TP is already licensed as part of WOMC and is actively providing outpatient hospital services under its single license and certification. The Office of Health Care Quality ("OHCQ") is authorizing WOMC/TP to place these 200 beds into service under the existing hospital license, subject to the issuance of an ECON. The WOMC/TP beds will be placed into service on the Lower Level 1, 1st, 2nd, 3rd, 4th and 5th floors.

The Commission's regulation limits an ECON to a capital budget that does not exceed the Commission's statutory threshold for capital expenditures otherwise triggering a certificate of need requirement. Areas of the WOMC/TP building are being renovated by contractors engaged by, and at the cost of, the Maryland State Department of General Services. WOMC understands that this ECON will not involve a capital expenditure exceeding the hospital threshold. WOMC's intention is for the additional WOMC/TP Beds to be available for inpatient services as early as this week.

We understand, based on guidance you have issued on the Commission's behalf, that the requirement under COMAR 10.24.01.20C for the WOMC to file a certificate of need application is suspended until at least thirty (30) days after the declared state of emergency of March 5, 2020 is terminated. Further, we understand that any ECON does not expire until thirty (30) days after the declared state of emergency of March 5, 2020 is terminated or 165 days after its issuance, whichever is later. WOMC does reserve the right to determine that the additional WOMC/TP Beds should be taken out of service after the termination of the declared state of emergency and, should that be the case, wishes to have an assurance that any ECON can remain in effect during a wind down and discharge of patients without the need for a certificate of need application should that period go beyond this 30-day post-emergency period.

Sincerely,



Howard L. Sollins

cc: Robert R. Neall, Secretary, Maryland Department of Health
Dennis R. Schrader, Deputy Secretary for Health Care Financing & Chief
Operating Officer
Andrew N. Pollak, M.D. Chairman, Maryland Health Care Commission
Katie Wunderlich, Executive Director, Maryland Health Services Cost Review
Commission
Patricia T. (Tricia) Nay, M.D. Director, Office of Health Care Quality
Renee Webster, Assistant Director for Hospitals, Laboratories and Patient Safety,
OHCQ
Paul Parker, Director, Center for Health Care Facilities Planning & Development
Kevin McDonald, Chief, Certificate of Need
Suellen Wideman, Esq., Assistant Attorney General
Travis A. Gayles, MD, PhD, Montgomery County Health Officer
Ruby Potter, Health Facilities Coordination Office

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Terry Forde, President and CEO, Adventist HealthCare

John Sackett, Executive VP and COO, Adventist HealthCare

Anthony Stahl, President, WOMC

Brent Reitz, Administrator WOMC/TP

Robert Jepson, Vice President, WOMC