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April 15, 2020

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

**Re: Adventist HealthCare Fort Washington Medical Center:
Request for Supplemental Emergency Certificate of Need**

Dear Mr. Steffen:

I am writing on behalf of Adventist HealthCare, Inc. d/b/a Adventist HealthCare Fort Washington Medical Center ("FWMC"), pursuant to the Maryland Health Care Commission ("Commission") regulations at COMAR 10.24.01.20, to request a supplemental emergency certificate of need ("ECON"), to incorporate and expand on the April 5, 2020 ECON EM-H20-16-015 issued to FWMC (the "April 5 ECON"). This request is further 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. Moreover, the Maryland Department of Health planning staff have been in contact with FWMC to engage in discussions about the hospital's capacity.

The April 5 ECON approved FWMC:

to establish additional inpatient bed capacity consisting of 20 medical/surgical/gynecological/addictions beds to be located in two temporary field hospital inpatient units at the Hospital, 11711 Livingston Road, Fort Washington (Prince George's County).

In this request for a supplemental ECON, FWMC wishes to expand the approval to include additional acute hospital beds and Emergency Department capability for a total of 46 acute hospital beds as follows:

Mr. Ben Steffen

April 15, 2020

Page 2

- (a) Maintain the 20 acute hospital beds for medical/surgical services issued under the April 5 ECON for placement within two inpatient field hospital units;
- (b) Put in place an additional 10 acute hospital beds for medical/surgical services for placement within a third inpatient field hospital unit;
- (c) Put in place 16 intensive care unit beds to be located in two inpatient field hospital units.
- (d) Moreover, the FWMC Emergency Department is severely undersized for the volume of visits, both historically and as exacerbated by the COVID-19 crisis. As the needs of FWMC and the patients it serves change, it is anticipated that there may be an ability for FWMC plans to use one or more of the field hospital units to support the Emergency Department.

The Commission's regulation limits an ECON to a capital budget that does not exceed the Commission's statutory Hospital capital threshold under Health—General Article, Section 19-120(a)(4), otherwise triggering a certificate of need requirement. FWMC represents that the total capital cost will be less than \$500,000.00.

We understand, based on guidance you have issued on the Commission's behalf that the requirement under COMAR 10.24.01.20C for the FWMC 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 and 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.

We request issuance of this ECON approval because it would put these 46 acute hospital beds into service at FWMC as soon as possible with the potential future use of these field hospital units to support the Emergency Department,

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
Katie Wunderlich, Executive Director, Maryland Health Services Cost Review
Commission
Patricia T. (Tricia) Nay, M.D. Director, Office of Health Care Quality

Mr. Ben Steffen

April 15, 2020

Page 3

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

Ruby Potter, Health Facilities Coordination Office

Ernest L. Carter, MD, PhD, Prince George's County Health Officer

Terry Forde, President and CEO, Adventist HealthCare

John Sackett, Executive VP and COO, Adventist HealthCare

Eunmee Shim, President, FWMC

Robert Jepson, Vice President