

March 1, 2021

VIA EMAIL AND FIRST CLASS MAIL

Mr. Paul E. Parker
Director for Health Care Facilities
Planning & Development
Maryland Health Care Commission
4160 Patterson Avenue
Baltimore, Maryland 21215

Re: Hope Health Systems Certificate of Need Application, Matter No. 20-03-2444

Dear Mr. Parker:

The University of Maryland Medical Center, Inc. (“UMMC”), hereby submits these comments pursuant to COMAR § 10.24.01.08F, addressing the Certificate of Need Application and related materials filed by Hope Health Systems, Inc. (“Hope Health”), proposing to establish a special psychiatric hospital for children and adolescents in Woodlawn, Baltimore County, Maryland.

By way of background, UMMC is comprised of two hospitals in Baltimore City: (1) an 806-bed teaching hospital — the flagship institution of the 14-hospital University of Maryland Medical System; and (2) a 180-bed community teaching hospital, UMMC Midtown Campus. In August 2018, UMMC sought Certificate of Need (“CON”) approval to establish a 16-bed acute psychiatric unit at UMMC to treat children and adolescents. UMMC’s 16-bed acute child and adolescent psychiatric unit will replace a 12-bed inpatient child psychiatric unit on the 11th floor of the North Hospital building. Both the child and adolescent psychiatric units will contain eight beds, but UMMC will provide separate treatment space and therapeutic programs for each population. On May 16, 2019, the Commission approved UMMC’s CON application to establish its new 16-bed acute psychiatric unit for children and adolescents and approved a project budget of \$9,580,000. UMMC’s approved CON project is set to open on or around April 2021.

In its CON Application, Hope Health proposes to establish a 16-bed specialty psychiatric hospital to treat children and adolescents at 1726 Whitehead Road, Woodlawn, Maryland, 21207, less than eight (8) miles driving distance to UMMC. UMMC is an “interested party” within the meaning of COMAR § 10.24.01.01B(20) for Hope Health’s CON application because UMMC is authorized to provide the same service as the applicant, in the same planning region used for purposes of determining need under the State Health Plan. Indeed, in its CON application, Hope Health projects to capture 9% of UMMC’s adolescent psychiatric discharges and 4% of UMMC’s acute child psychiatric discharges, notwithstanding that UMMC’s new child and adolescent psychiatric unit has not yet opened.

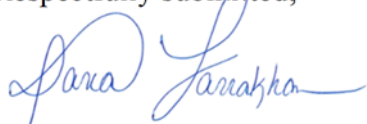
UMMC desires to be recognized as an interested party in connection with Hope Health's CON application. Further, UMMC requests that if the Commission approves Hope Health's CON application that the Commission do so with the condition that Hope Health accept involuntary admissions and not deny admissions based upon a patient's legal status as an involuntary patient or because of a patient's ability to pay for services, as contemplated by the draft State Health Plan. *See* Draft, State Health Plan for Facilities and Services: Acute Psychiatric Hospital Services, COMAR §§ 10.24.07.05(B)(7)-(8) (approved for formal public comment (Feb. 18, 2021)); COMAR § 10.24.07 Standard AP7.

UMMC looks forward to participating at any project status conference or in another appropriate setting. In the meantime, all future correspondence and communications concerning Hope Health Systems' CON Application can be sent to:

Dana Farrakhan, MHS, FACHE
SVP, Strategy, Community and Business Development
University of Maryland Medical Center
22 S. Greene Street, Executive Office
Baltimore, Maryland 21201
410-328-1314
dfarrakhan@umm.edu

Thank you for your consideration.

Respectfully submitted,



Dana Farrakhan, MHS, FACHE

cc:

Mr. Yinka Fadiora
Hope Health Systems
1726 Whitehead Road
Woodlawn, Maryland 21207
yfadiora@hopehealthsystems.com

Bryan Niehaus
7840 Graphics Dr., Suite 100
Tinley Park, IL 60477
bniehaus@advis.com

Dr. Nilesh Kalyanaraman
Health Officer
Anne Arundel County Health Dept.
Health Services Building
3 Harry S Truman Pkwy
Annapolis MD 21401
hdkaly00@aacounty.org

Edwin F. Singer
Health Officer
Carroll County Health Dept.
290 S. Center Street
Westminster, MD 21157
ed.singer@maryland.gov

Dr. Letitia Dzirasa
Health Commissioner
Baltimore City Health Dept.
1001 E. Fayette Street
Baltimore, MD 21202
letitia.dzirasa@baltimorecity.gov

Dr. Russell Moy
Health Officer
Harford County Health Dept.
120 S. Hays Street
PO Box 797
Bel Air MD 21014-0797
russell.moy@maryland.gov

Gregory W. Branch, M.D.
Health Officer | Director of Health and Human Services
Baltimore County Health Department
6401 York Rd 3d Floor
Baltimore MD 21212-2130
gbranch@baltimorecountymd.gov

Dr. Maura J. Rossman
Health Officer
Howard County Health Department
8930 Stanford Blvd.
Columbia MD 21045
mrossman@howardcountymd.gov

Sarah Edwards, MD
Assistant Professor and Division Director
Child and Adolescent Psychiatry
University of Maryland School of Medicine
University of Maryland Medical Center
sedwards@som.umaryland.edu
410-328-3522

Jill RachBeisel, MD
Associate Professor and Chair, Department of Psychiatry

University of Maryland School of Medicine
University of Maryland Medical Center
jrachbei@som.umaryland.edu
410-328-5161

Emily Wein. Esq.
General Counsel
University of Maryland Medical Center
Emily.wein@umm.edu
410-328-8375

Scott Tinsley-Hall
Director, Strategy and Market Intelligence
University of Maryland Medical Center
stinsley@umm.edu
410-328-0027