



October 19, 2022

**VIA Email & U.S. MAIL**

Katherine Bonincontri  
President and Executive Director  
Pascal Crisis Services, Inc.  
1215 Annapolis Road, Suite 204  
Odenton, Maryland 21113

**Re: Pascal Crisis Services, Inc.  
Establish a Track Two ICF  
Matter No. 22-02-2459**

Dear Ms. Bonincontri:

Commission staff has reviewed the application and first response to completeness questions submitted by Pascal Crisis Services, Inc. (PASCAL) for Certificate of Need (CON) approval to establish a 25-bed Track Two Level 3.7/3.7WM medically monitored intensive inpatient treatment program in Crownsville, Anne Arundel County. Staff has additional questions after the initial set of completeness questions, and requests that you provide responses to the following questions:

**Need**

1. On page 26 of the original application, you cite the September 2021 University of Maryland's Opioid Treatment Programs in Maryland Needs Assessment Report, and state that when "comparing treatment need to OTP capacity, it is estimated that there are over 11,000 Marylanders in need of OUD treatment that OTPs do not have the capacity to treat...five jurisdictions having a treatment need exceeding OTP treatment capacity by more than a thousand persons – Montgomery County, Prince George's County, Anne Arundel County, Baltimore County, and Frederick County."

This statement does not fully address the need standard for increased services. Please provide specific information and data that supports the need for an increase in services, both for the population in Anne Arundel County and the primary service area. Include more detail about the populations, such as any assumptions made regarding population

growth, future volumes, or other variables, and information on the methodology used to determine need.

2. Please provide the following information, and any additional information and data supporting the need for the program:
  - a. What has been the daily census or bed occupancy for the last three years at PASCAL, and what has been the average length of stay (ALOS)?
  - b. What is the estimated average wait time to find an open bed for appropriate care? How has that changed in each of the last three years?
  - c. Please provide any other data or use statistics on your clients needing sobering services, and then moving to withdrawal management services, which supports the need for the new services.

### **Impact on Existing Providers**

3. Describe the services provided by PASCAL, and how this may impact existing providers:
  - a. What are the hours of operation for PASCAL, and is this different from existing providers?
  - b. How will approval of this CON impact the operating hours at PASCAL?
  - c. Does PASCAL receive referrals from existing providers due to the staffing expertise at PASCAL? Describe how this referral type may minimize the impact on existing providers.
  - d. How will the addition of 3.7/3.7WM services impact services to existing patients needing services?
  - e. Do you expect an increase in the volume or types of referrals received with the new program's services?

Please submit four copies of the responses to the additional information requested in this letter within ten working days of receipt (if needed, don't hesitate to request an extension). Also submit the response electronically, in both Word and PDF format, to Ruby Potter ([ruby.potter@maryland.gov](mailto:ruby.potter@maryland.gov)).

All information supplementing the application must be signed by person(s) available for cross-examination on the facts set forth in the supplementary information, who shall sign a statement as follows: "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."

Should you have any questions regarding this matter, feel free to contact me at (410) 764-3324.



Katherine Bonincontri  
Pascal Crisis Services, Inc.  
Page 3

Sincerely,



Eric Baker  
Program Manager, Certificate of Need Division

cc: Nilesh Kalyanaraman, M.D., Anne Arundel County Health Officer  
Wynee Hawk, Chief of Certificate of Need Division

