



February 4, 2022

Mallory M. Regenbogen, Esq.
Gallagher, Evelius & Jones
218 North Charles Street, Suite 400
Baltimore, Maryland 21201

Re: Project Change After Certificate of Need Approval
University of Maryland St. Joseph Medical Center
Docket No. 18-03-2415

Dear Ms. Regenbogen,

Commission staff has reviewed the request for a change in the above-referenced Certificate of Need (CON). Please respond to the following questions and requests for additional information or clarification.

1. Will the proposed renovations result in surgical facilities designed in compliance with COMAR 10.24.11.05B(4)? If not, please clarify.
2. Discuss whether the renovations will include changes that address patient safety, in compliance with COMAR 10.24.11.05B(6).
3. Describe the proposed renovations in more detail and provide more specific details on the \$400,000 project budget.
4. Provide all of the assumptions that were used in projecting FY 2022 surgical case volume and provide all data used in formulating these assumptions.
 - A. Include relevant information on the new relationship with Kaiser Permanente (KP) and its impact on the demand for surgical services at University of Maryland St. Joseph Medical Center (SJMC), as well as information on the recent use of KP's ambulatory surgical facilities and the specific projected shift to SJMC of case volume from KP facilities and from other hospitals providing surgery to KP members.

- B. Also, provide information on changes in SJMC surgical practitioners, and the movement of outpatient surgical case volume from the hospital to outpatient settings, detailing the way in which these factors affected projections.
5. How will this project increase or reduce the cost of providing the surgery case volume projected for performance at SJMC? How will this project increase or reduce charges for the surgery case volume projected for performance at SJMC? Provide the relevant facts and assumptions underlying this assessment of cost and charge impact.
6. Discuss how UM SJMC would function with only eleven ORs instead of adding the 12th general purpose OR?

Please submit four copies of the responses to completeness questions and the additional information requested in this letter within ten working days of receipt. Also submit the response electronically, in both Word and PDF format, to Ruby Potter (ruby.potter@maryland.gov).

All information supplementing the applicant 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,

Should you have any questions regarding this matter, feel free to contact me by either e-mail at laura.hare1@maryland.gov or phone at (804) 347-6024.

Sincerely,



Laura Hare Nirschl
Program Manager

cc: Thomas Dame, Esquire, Gallagher, Evelius & Jones
Robin Luxon, Senior Vice President, UM SJMC
Paul Parker
Wynee Hawk
Sarah Pendley, AAG

