



April 1, 2026

VIA E-MAIL

Abisola Raimi-Abayomi, Clinical Director
First Healthcare Consultants, LTD
12906 North Point Lane
Laurel, MD 20708

Re: First Healthcare Consultants, LTD – Certificate of Need Application
Establishment of a New Home Health Agency
Matter No. 26-R7-2492; 26-R7-2493; and 26-R7-2494

Dear Ms. Raimi-Abayomi:

Upon review of the First Healthcare Consultants, LTD (FHC) application for a Certificate of Need (CON) to the Maryland Health Care Commission (MHCC or the Commission), Commission staff have clarification questions and request written responses.

PART I: PROJECT IDENTIFICATION AND GENERAL INFORMATION

Project Implementation Schedule

1. How will the same batch 1 staff meet the needs of the batch 2 population given distance and transportation constraints?

Project Description

2. How will FHC ensure adequate on-call nursing coverage and accept referrals 24/7, year-round, with only an additional 0.08 FTE RN and LPN combined?

PART II - CONSISTENCY WITH REVIEW CRITERIA AT COMAR

Populations and Services

3. Provide growth projections for individuals under age 65, as the proposal includes serving all age groups, pediatric through adult, within this service area.
4. Provide data to demonstrate need for pediatric home health services within the proposed service area.

5. Among patients discharged home, what proportion had a documented referral to a home health agency at discharge, and of those, how many initiated services within seven days?

Charity Care

6. Provide the percentage of FHC patients by payer source for CY 2025, 2024, and 2023.
7. What remedial plan or policy is in place if the agency does not meet its annual charity care benchmark?

Impact

8. What specific operational impacts will the RSA experience from reallocating existing clinical and administrative staff to the proposed HHA, and what measures are in place to prevent service disruptions or capacity reductions within the RSA?

Project Impact Review Criterion

9. How does the agency justify its conclusion that the proposed Medicare-certified HHA will significantly improve patient access, given its projection that only a small number of previously unserved patients will be reached particularly during the start up?

Character and Competence

10. What are the key factors that attributed to FHC success rate in reducing hospital admissions other than initiating care/ services within the first 48 hours?

Revenues and Expenses

11. Provide the metrics in table 3 for CY 23, CY 24, and CY 25 as it relates to RSA operations.
12. Given the anticipated shift in payor mix from Medicaid to Medicare, how will FHC address and mitigate potential disparities to ensure continued access and service for the Medicaid population?

Staffing Information

13. Given that speech therapy is a newly introduced and actively promoted service, what is the rationale for allocating only 0.01 FTE to speech therapy in the region?



- How will this staffing level adequately meet anticipated patient demand?
- Please clarify whether batch 1 and batch 2 share the same FTE allocation for speech therapy.
- Will the staffing budget for this position from batch 1 carry over into batch 2?

14. Given the addition and expansion of services, explain how the patient care needs will be met with minimal increase in staff for this proposed service area.

Proposed Revenue Assumptions

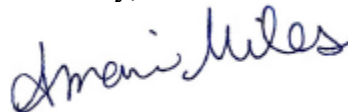
15. The Commission staff reviewed Tables 19 and 20 of the 2023 Home Health and Utilization Data available in the Public Use files on the Commission website. Please provide a detailed explanation of the basis for the adjustments reflected in these tables. Additionally, clarify the methodology used to compare the data and how this analysis led to the conclusion of a two percent reduction in the Medicaid market within the target service area.

Please submit four copies of the responses to the additional information requested in this letter within ten working days of receipt. (Note: extensions are routinely available upon request). Also submit the response electronically, in both Word and PDF format, to Deanna Dunn at (Deanna.Dunn4@maryland.gov).

All information supplementing the application must be signed by a person(s) available for cross-examination on the facts set forth in the supplementary information, and 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) 764-5593 or amani.miles1@maryland.gov. We appreciate your prompt attention.

Sincerely,



Amani Miles
Program Manager

cc: Wynne Hawk, Director, Center for Health Care Facility Planning
Jeanne-Marie Gawel, MA, MGS, LNHA, Chief of Facilities Planning



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Michelle Taylor, MD, Baltimore City, Health Officer

Lucy Wilson, MD., Baltimore County Health Officer

Maura Rossman, Howard County Health Officer

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