

January 17, 2020

Laurie R. Beyer, MBA, CPA  
Executive Vice President and Chief Financial Officer  
Greater Baltimore Medical Center  
6701 North Charles Street  
Towson, Maryland 21204

**Re: Greater Baltimore Medical Center  
Modernization  
Docket No. 19-03-2439**

Dear Ms. Beyer:

The application for a Certificate of Need for the project identified above has been received and reviewed for completeness by the Commission's Staff. The application will be docketed for formal review as of **January 31, 2020** and notice of the docketing of the application will appear in the *Maryland Register* on that date. Although not affecting the docketing of the application, staff will require the following changes prior to rendering a positive recommendation:

1. Staff outlined the changes needed to the GBMC charity care policy on a conference call held on January 13, 2020. To reiterate, the changes are in regards to determination of probable eligibility. The following is a summary of the requirements under this regulation, why GBMC's policy falls short, and what GBMC can do to remedy that.
  - a) Requirements explained:  
Subsection (1) of the Charity Care Standard requires that within two business days following a client's initial request for charity care services, application for medical assistance, or both, the hospital shall make a determination of probable eligibility and communicate this probable eligibility determination to the patient.

Requiring a completed application with documentation for probable eligibility does not comply with this standard. There should be a two-step process that allows a probable determination to be communicated within two days based on an abridged set of information, followed by a final determination based on a completed application with documentation permissible.

- b) GBMC's Policy and Procedures do not comply because:  
GBMC's policy is noncompliant with this subsection because a person seeking charity care is required to submit in writing the "Maryland State Uniform Financial Assistance Application," which also requires that an applicant provide certain documentation before the hospital will make a determination of probable eligibility.
- c) GBMC must modify its policy by:  
GBMC must modify its policy and bring it into compliance by removing any requirement for documentation as part of a determination of probable eligibility. This includes modifying the use of the "Maryland State Uniform Financial Assistance Application".

Please submit three copies of the responses to 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](mailto:ruby.potter@maryland.gov)).

Should you have any questions regarding this matter, feel free to contact Kevin McDonald at (410) 764-5982.

Sincerely,

Ruby Potter  
Health Facilities Coordinator

cc: Gregory Branch, MD, Baltimore County Health Officer  
Tom Dame, Esquire