



Takoma Park City Council Meeting – May 25, 2022 Agenda Item 3

Voting Session

Resolution to Approve a Letter to the Maryland Healthcare Commission Expressing Support for Adventist HealthCare's Request for Modification of the White Oak Medical Center Certificate of Need & Proposed Healthcare Services in Takoma Park

Recommended Council Action

Approve Resolution

Context with Key Issues

In collaboration with a Council subcommittee including Mayor Stewart, Councilmembers Kovar and Dybala, and City management, Adventist HealthCare has developed an updated proposal for future healthcare services in Takoma Park after the eventual closure of the urgent care. At the center of the Adventist Healthcare proposal is a new primary care office in the medical office building located on the former Washington Adventist Hospital Campus. The medical office building is the first building on the left as you enter the campus from Carroll Avenue. It has its own parking lot, offering convenient access for patients. Importantly, this property is not owned by Adventist HealthCare and, therefore, is not included in the pending sale of the former hospital campus to Washington Adventist University. In addition, the Adventist Healthcare proposal includes a commitment to provide behavioral health counseling embedded in the primary care office as well as to donate space for a behavioral health crisis response center in Takoma Park.

On April 20, Andrew R. Nicklas, Deputy General Counsel & Director of Government Relations for Adventist HealthCare, presented the updated proposal to the City Council. The Adventist Healthcare Request for Modification of the White Oak Medical Center Certificate is scheduled to be an agenda item on the Maryland Healthcare Commission (MHCC) June 16 meeting. The Request for Modification submission to MHCC includes the updated proposal for healthcare services in Takoma Park. If this resolution is approved, the City Council Letter of Support will be appended to Adventist Healthcare's Request for Modification submission to show that the City of Takoma Park is supportive of the proposed healthcare services.

Council Priority

Livable Community for All

Environmental Considerations

The proposal involves pre-existing buildings within City limits.

Fiscal Considerations

Adventist Healthcare is not asking for a financial commitment from the City in their updated proposal.

Racial Equity Considerations

Healthcare in Takoma Park is a top priority to meet the health care needs of disadvantaged, underserved, and chronic need populations.

Attachments and Links

- Draft Resolution

- AHC Request to Modify Certificate of Need Condition
- Takoma Park City Council Letter of Support for AHC's Request to Modify

Introduced by:

CITY OF TAKOMA PARK, MARYLAND

RESOLUTION 2022-

**RESOLUTION APPROVING A LETTER TO THE MARYLAND HEALTHCARE
COMMISSION EXPRESSING SUPPORT FOR ADVENTIST HEALTHCARE'S
REQUEST FOR MODIFICATION OF THE CERTIFICATE OF NEED FOR THE
WHITE OAK MEDICAL CENTER**

WHEREAS, Adventist Healthcare (AHC) has filed a request with the Maryland Healthcare Commission for Modification of the Certificate of Need for the White Oak Medical Center (Docket No. 13-15-2349); and

WHEREAS, the request is to close the Urgent Care Center currently located on the former Washington Adventist Hospital campus and replace it with a primary care office with embedded behavioral health counseling; and

WHEREAS, the offices are proposed to be located in the medical office building on the former hospital campus; and

WHEREAS, AHC has also committed to the City to donate a physical space in that building for a behavioral health crises response center that will be established through a partnership with the Montgomery County Department of Health and Human Services.

NOW, THEREFORE, BE IT RESOLVED THAT the City Manager and Mayor are authorized to sign the attached letter to the Maryland Healthcare Commission supporting the proposal from Adventist Healthcare and the Request for Modification of the Certificate of Need.

Adopted this ____ day of May, 2022.

City of Takoma Park

Office of the City Council

Telephone: (301) 891-7202
Fax: (301) 270-8794



7500 Maple Avenue
Takoma Park, MD 20912

Takoma Park City Council

May 25, 2022

Paul E. Parker
Director, Center for Healthcare Facilities Planning & Development
Maryland Healthcare Commission
4160 Patterson Avenue
Baltimore, MD 21215

Dear Mr. Parker,

The Takoma Park City Council and City Manager would like to express our support for the Request for Modification of the Certificate of Need for the White Oak Medical Center from Adventist Healthcare (Docket No. 13-15-2349). The Request for Modification is based on the Adventist Healthcare Proposal for Healthcare Services in Takoma Park. This proposal is endorsed by the City following several months of robust discussion between Adventist Healthcare and City leadership.

The services offered by Adventist Healthcare (AHC) to replace the urgent care center have evolved significantly since the AHC July 2021 modification request. The expanded scope of the new AHC services resulted from direct feedback from both Councilmembers and City staff as to what types of services our City residents would need to compensate for the loss of the urgent care center. We believe the updated proposal is much improved and will make a valuable contribution to the work of meeting the health care needs of the Takoma Park community. We thank the AHC executive team for their regular involvement in workgroup discussions since January 2021.

The AHC augmented proposal includes the establishment of a primary care office with embedded behavioral health counseling. AHC has also committed to donating a physical space for a behavioral health crisis response center that will be established through a partnership with the Montgomery County Department of Health and Human Services. Primary healthcare that is sustainable and preventative will benefit all of our residents.

Behavioral healthcare for residents in crisis is another pressing need in our community. We look forward to supporting the enhanced proposal to be presented by the AHC team at the June 16th Maryland Healthcare Commission meeting.

The City of Takoma Park will continue to engage with Adventist Healthcare in partnership in the coming months to monitor the impact of these services on healthcare in our community and to facilitate the crisis response center. In particular, we look forward to updates from Adventist Healthcare on the volume of patients, the patients' demographic profiles and diagnoses, and the status of proposal implementation among other measurable outcomes.

We greatly appreciate the Maryland Healthcare Commission's ongoing efforts to work with the City and its healthcare stakeholders to ensure that the healthcare needs of our residents are met. Please let us know if there is any additional information we can provide.

Sincerely,

Mayor Kate Stewart for the Takoma Park City Council

Jamal Fox, City Manager of Takoma Park

IN THE MATTER OF

WASHINGTON
ADVENTIST HOSPITAL
(NOW ADVENTIST
HEALTHCARE WHITE OAK
MEDICAL CENTER)

DOCKET NO. 13-15-2349

BEFORE THE MARYLAND

HEALTH CARE

COMMISSION

REQUEST FOR APPROVAL TO MODIFY
A CERTIFICATE OF NEED CONDITION

Adventist HealthCare, Inc. (AHC) d/b/a Adventist HealthCare White Oak Medical Center (WOMC), requests the Maryland Health Care Commission (the Commission) to modify a condition of the certificate of need (CON) issued to WOMC (the Condition) in the above-captioned CON review which permitted the hospital, formerly named Washington Adventist Hospital, to relocate to its current cite.

The Condition states:

Adventist HealthCare, Inc. must open an urgent care center on its Takoma Park campus coinciding with its closure of general hospital operations on that campus. The urgent care center must be open every day of the year, and be open 24 hours a day. Adventist HealthCare, Inc. may not eliminate this urgent care center or reduce its hours of operation without the approval of the Maryland Health Care Commission.

This filing seeks modification of the Condition to enable AHC to operate a primary care office in Takoma Park with embedded behavioral health counseling

services in lieu of the urgent care. AHC proposes the modified condition read as follows:

With its closure of the urgent care center on the former Washington Adventist Hospital campus, Adventist HealthCare, Inc. shall open a primary care office with embedded behavioral health counseling in Takoma Park [as outlined in Exhibit A](#). Adventist HealthCare, Inc. may not eliminate ~~these~~ services without the approval of the Maryland Health Care Commission.

Furthermore, working with representatives of the City of Takoma Park and Montgomery County, AHC will donate a physical location for the establishment of a behavioral health crisis response center in Takoma Park. In developing this petition, AHC engaged extensively with representatives of the City of Takoma Park as evidenced by the letter of support from the City endorsing this filing. AHC will update the City of Takoma Park on the status of implementation of these new services.

A. BACKGROUND

AHC previously appeared before the Commission in July of 2021, requesting approval to reduce the hours of the urgent care in Takoma Park from 24 hours per day to 12 hours per day. As part of the modification request, AHC offered to develop a plan to provide needed, sustainable primary healthcare services in Takoma Park. The Commission denied that proposal, preferring that AHC develop a plan to provide services in Takoma Park before approving a modification to the Condition. The Commission requested that AHC engage with representatives from the City of

Takoma Park in developing this plan. Since that time, AHC engaged extensively with City of Takoma Park representatives.

In November 2021, AHC presented a proposal to the Takoma Park City Council to replace the urgent care with a primary care office and behavioral health counseling services and to support establishing a local behavioral health crisis response center. Councilmembers had several questions and recommended forming a workgroup to examine the proposal in detail. From January through April of 2022, AHC participated in regular workgroup meetings. To demonstrate our commitment to the process and to facilitate a robust and in-depth discussion, AHC brought several executive leaders and subject matter experts to these meetings. The members of the workgroup for both AHC and the City of Takoma Park included:

- Kate Stewart, Mayor of Takoma Park
- Peter Kovar, Ward 1 Councilmember
- Cindy Dyballa, Ward 2 Councilmember
- Jessica Clarke, Deputy City Manager
- Dr. Marissa Leslie, AHC Medical Director of Behavioral Health Services
- Mary McNamara Ward, AHC Vice President, Physician Network Operations
- Kandy McFarland, AHC Interim Vice President of Behavioral Health
- Kim Emerson, AHC Director of Behavioral Health Integration, and
- Andrew Nicklas, AHC Deputy General Counsel.

These meetings helped AHC better understanding the needs of Takoma Park residents and helped City representatives better understand the scope of the proposed services. Ultimately, the workgroup's efforts resulted in the augmented proposal attached hereto as Exhibit A. This proposal was presented, in-person, to the Takoma Park City Council in April of 2022 and has been endorsed by the City via their letter of support.

B. THE URGENT CARE IN TAKOMA PARK IS NOT SUSTAINABLE

AHC has operated the urgent care in Takoma Park since August 26, 2019. Both AHC and Commission staff made reasonable, good faith projections that the urgent care would be well utilized. AHC invested nearly \$450,000 in startup expenses including renovations and medical equipment. AHC promoted the urgent care through multiple forms of media and in multiple languages, including

- Direct mail sent to local residents
- Social media promotions (See: <https://www.facebook.com/AdventistUCTakomaPark/>);
- An article in the Takoma Park newsletter
- Website updates on all AHC related sites
- Inclusion of the UCC on material announcing the WOMC
- Additional flyers and handouts distributed at public events, and
- Inclusion of Takoma Park on AHC Urgent Care outdoor advertising.

Information on the hours of operation and public transportation options to reach the urgent care are readily available on the [website](#).

Despite these efforts, AHC continues to experience low patient volumes. Since opening in August 2019 through October 2021, the Takoma Park urgent care

has seen approximately half the patients as the three other former AHC urgent cares – despite being the only center open 24 hours. In 2021, the Takoma Park urgent care saw an average of 25 patients per day compared to approximately 44 to 50 patients per day in the three other centers – again despite being the only one open 24/7. (See Exhibits B & C)

Takoma Park is served by five urgent care centers in addition to the one operated by AHC. (See Exhibit D) Takoma Park will continue to have access to urgent cares without the AHC urgent care.

These low volumes make the Takoma Park urgent care unsustainable. From opening in August of 2019 through September of 2021, the urgent care lost over \$2.2 million. From January through September of 2021, the Takoma Park urgent care lost \$740,874 while the other three AHC urgent care centers each earned a profit ranging from nearly \$150,000 to over \$230,000. This is not to say that earning profits is the primary goal of health care, however, AHC cannot sustain this operation with annual losses of nearly \$1 million. (See Exhibit E & F)

Significant staffing challenges add to the operational struggles of the urgent care and contribute to the financial losses. Recruiting staff has become so difficult that it is nearly untenable. AHC is forced to hire contract staff at a significantly greater cost and is still struggling to find people. These higher costs exacerbate the financial distress caused by the low patient volumes.

Continuing urgent care operations is simply not viable for AHC. Furthermore, AHC has chosen to step away from urgent care operations as a whole.

CFG Health Care, an established urgent care operator, has been brought on to take over operations of the other three AHC urgent care locations under the name Patriot Urgent Care. AHC has chosen to focus on building an extensive clinically integrated network of community providers. This strategy more directly supports AHC's goal of keeping people healthy, managing chronic conditions, reducing acute issues, and improving the overall health of the communities we serve. For these reasons, we believe the services proposed in this filing will better serve the City of Takoma Park.

C. PROPOSED SERVICES FOR TAKOMA PARK

AHC met extensively with City representatives to understand the healthcare needs of City residents. As part of a discussion about access to primary care, the most pressing needs we heard were related to behavioral health. AHC has assessed this information and, in response, proposes a suite of targeted healthcare services that we believe will best meet these needs.

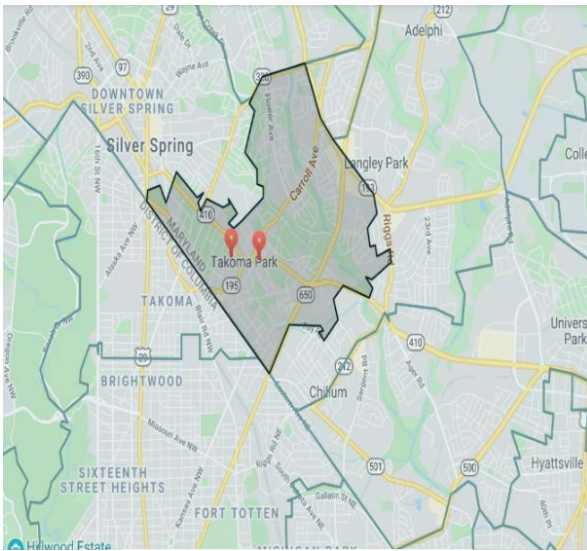
i. Primary Care with Embedded Behavioral Health Counseling

AHC has built the largest clinically integrated network of community providers in Maryland. Expanding access to community-based care improves health outcomes by reducing acute issues through routine preventative care and proper management of chronic conditions. Therefore, AHC proposes to establish a new primary care office with additional embedded behavioral health counseling services in the medical office building on the former hospital campus. The office

has been newly renovated and can be opened within a matter of weeks after approval of this petition.

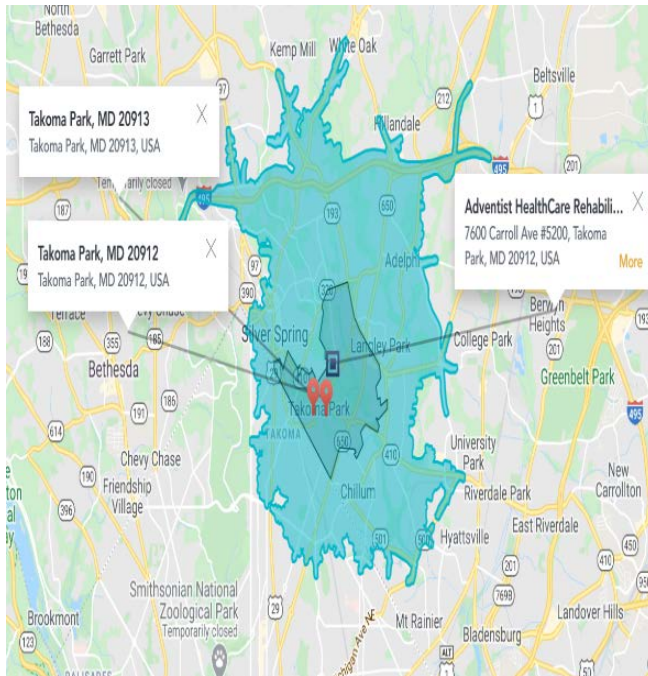
a. Primary Care

AHC conducted a market analyses to assess the ambulatory care needs of the Takoma Park community. The primary service area is comprised principally of two zip codes – 20912 and 20913, as depicted below:

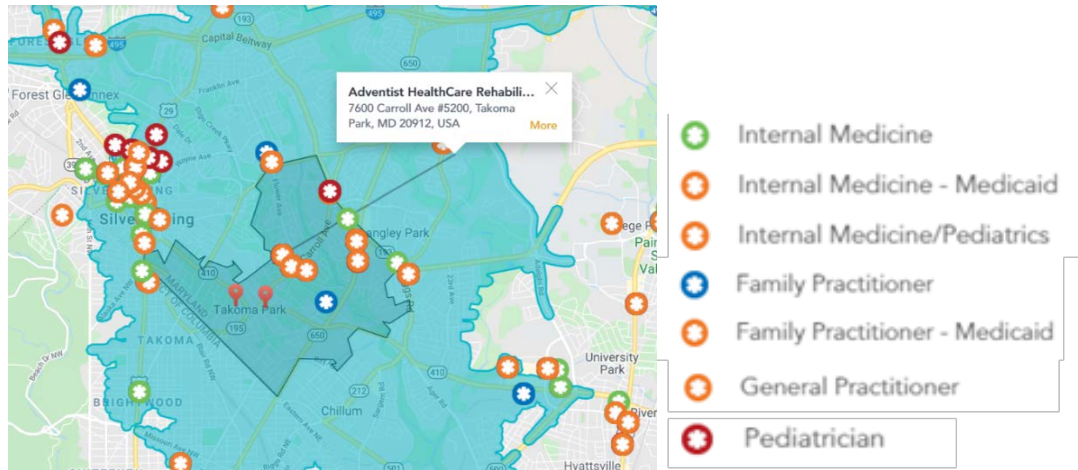


According to the 2020 Census, the total population for this area is about 26,000 persons with approximately 10,000 households and the median age is only 34 years old. The population is expected to grow slowly, with only 0.34% growth predicted by 2024. (Source: Buxton).

For the purposes of reviewing ambulatory needs data, AHC analyzed the zip codes map plus an area within a 20-minute drive time from the AHC urgent care in Takoma Park as displayed below.



The graphic below depicts primary care outpatient locations in Takoma Park and surrounding zip codes. AHC found that, compared to Montgomery County as a whole, there is a lack of primary care providers in Takoma Park despite a high demand for care. There are approximately 15 primary care locations within Takoma Park including private and community clinics with approximately 27 full time providers giving an overall ratio of 962 patients to every one primary care provider. As a comparison, Montgomery County, as a whole, has a ratio of approximately 732 patients to one primary care physician. Despite this deficiency in providers, there is a high demand for primary care as there were approximately 150,000 primary care visits in Takoma Park in 2018 – a care usage frequency of about 130% of the national average.

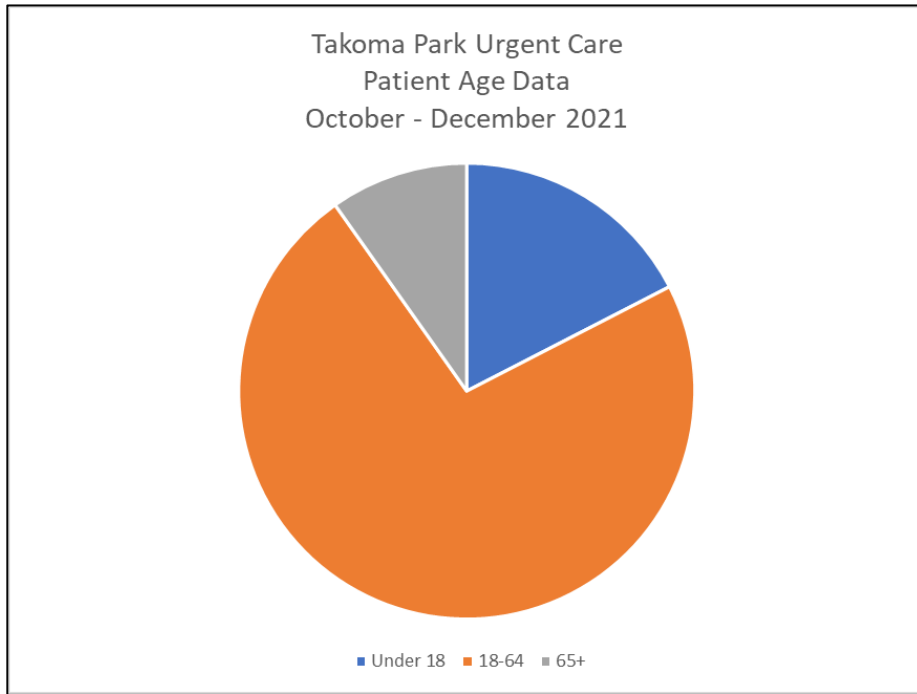


There are a number of primary care providers in neighboring Silver Spring, including an existing AHC primary care office on Colesville Road. However, southern Takoma Park has far fewer primary care locations and could benefit from a primary care center focusing on family care which would be ideal given the young age range of the population.

The office would employ a family care practitioner and a medical assistant as well as support staff. It would offer a full range of primary care for patients, including preventative care and treatment of chronic conditions. The office would operate Monday – Friday from 8am to 5pm but patients would have 24/7 access to the on-call line with live answering. The office will be able to accommodate approximately 18-20 patients per day. AHC will consider expanded hours of operation as the office expands. This was the case in the AHC primary care office in Silver Spring, which has grown to sustain three providers. This is in comparison

to the urgent care which saw an average of 25 patients per day in 2021 – despite being open 24/7. ¹

AHC primary care offices serve patients from 16/17 years old through geriatric patients. It is industry standard to separate pediatric practices from general adult services as internists do not treat patients under 16. As you can see below, this potentially covers over 80% of the age range of patients seen at the urgent care. For families with younger children, AHC will meet with the current pediatric office down the hall from our proposed location, or other local practices, to build relationships for referrals.



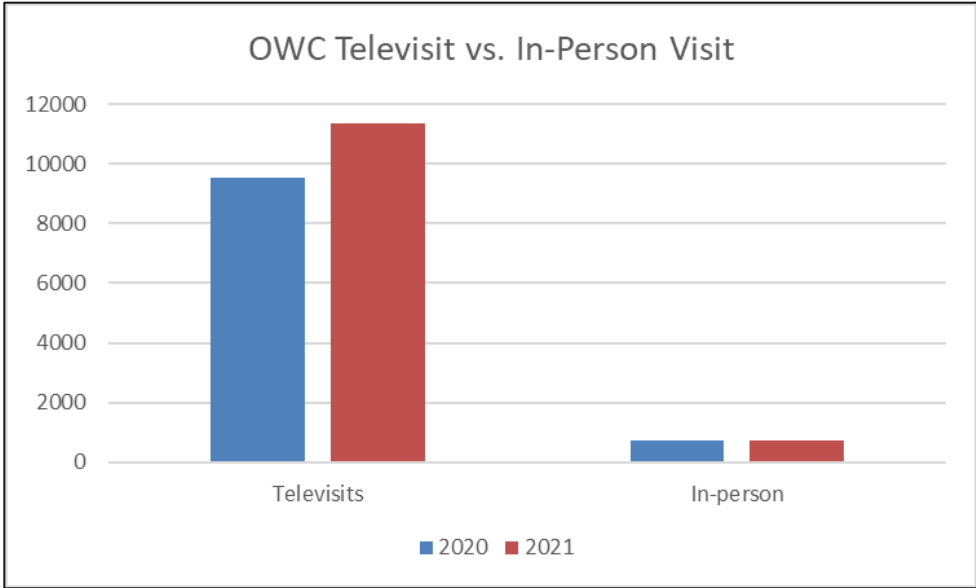
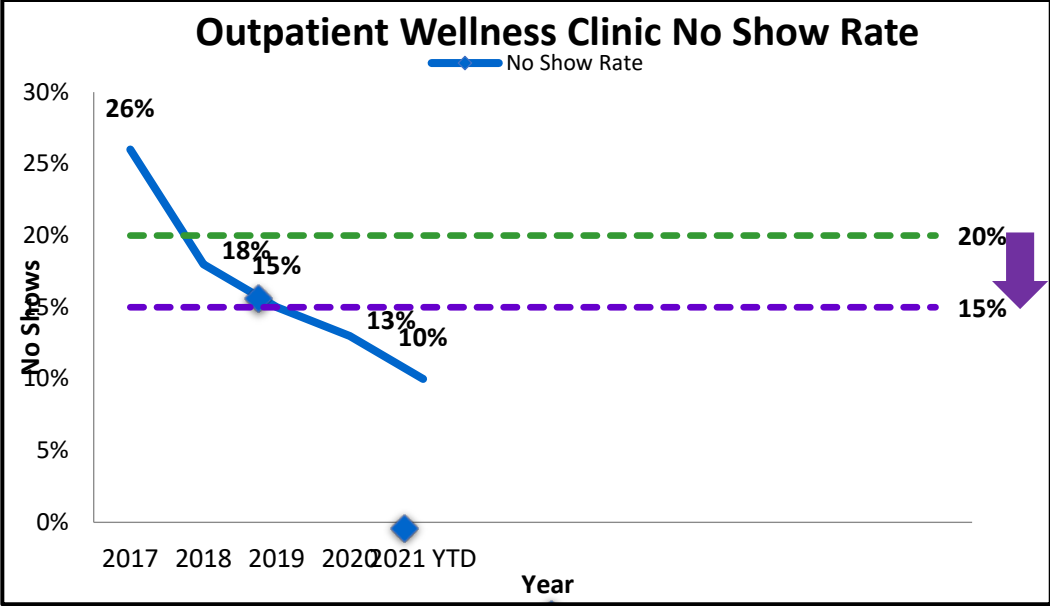
	Under 18	18-64	65+	Total
Total Visits	475	1983	267	2725
Percent of Total	17%	73%	10%	100%

¹ See Exhibit C.

b. Behavioral Health Counseling

The new primary care office will also provide behavioral health counseling delivered both in-person and through telehealth. Counseling (provided by professional counselors and licensed social workers) and medication management (provided by psychiatrists and psychiatric nurse practitioners) will be available in-person one day a week and five days a week via telehealth. A private space with a computer will be made available at the office for patients without the technology or a private space for telehealth. A therapist can see approximately six patients per day in-person and exponentially more can be seen via telehealth depending on demand. As demand increases, the availability of in-person services can increase as well. Counseling services, unlike the physical care, will be available for children, adolescents, adults, and older adults. Services will be available in English and Spanish.

Telehealth has been transformational for behavioral healthcare. Patients are more easily able to access and comply with medication management and psychotherapy. Issues around transportation, busy work schedules, childcare, stigma, privacy, and difficulty leaving the house due to symptoms of their psychiatric diagnosis can all be eased with telehealth services. With the expansion of telehealth services, the “no-show” rate for behavioral health visits at AHC’s outpatient wellness clinic has dropped to 10%.



	2020		2021	
	Count	% of Total	Count	% of Total
Televisits	9517	93%	11363	94%
In-person	736	7%	730	6%
Total	10253		12093	

Embedding counseling services within a primary care office facilitates access to behavioral health care. Primary care providers are the largest referral source to

behavioral counseling as patients often first report mental health concerns to their primary care provider. Additionally, AHC primary care and behavioral health services are clinically integrated and share an electronic medical record, allowing for enhanced collaboration on mutual patients and a streamlined referral process. Both behavioral and physical health services can be augmented to meet community demand.

c. Operations and Care Coordination

The physical and behavioral health services offered at the proposed primary care office offer patients an opportunity to develop a long-term relationship with a provider. Primary care focuses on preventative and chronic care management. Comparatively, urgent care visits are more transactional and focus on the issue being presented at the time. Establishing a long-term relationship with a provider leads to better health outcomes. Patients are more likely to complete regular wellness checks and screenings when they have a consistent primary care provider. This leads to early detection of potential health issues and provides an opportunity to take corrective actions to avoid future complications and crisis situations. Primary care practitioners have a more complete understanding of their patients' health. They can get to know patients on a personal level and gain a sense of all the things that may be affecting someone's health. This relationship enables primary care physicians to oversee a patient's care more effectively, coordinate among specialists as needed, and help patients reach their long-term health goals.

Community members seeking either physical or behavioral health care will not need any pre-existing relationship with AHC to access these services. Likewise, people seeking behavioral health services will not need to be patients of the primary care office. Anyone can contact the office and schedule a visit. If someone arrives without an appointment, staff will engage with them and work to get a visit scheduled.

The primary care office will accept the exact same insurance as the urgent care, including Medicaid, Medicare, and commercial insurance. The primary care office also has a charity care policy for those who are underinsured or uninsured that offers discounted rates for care. Interestingly, the payor mix at the AHC primary care office in Silver Spring is very similar to the payor mix seen at the urgent care in Takoma Park. The primary care office, however, unlike the urgent care, will assist individuals without insurance with enrolling in Medicaid.

Additionally, AHC primary care offices participate in the Project Access program. Project Access is a countywide program administered by the Primary Care Coalition and funded by Nexus Montgomery and Montgomery County to provide access to care for low-income, uninsured community members. AHC's clinically integrated network of providers participate in the program. From July through December of 2021, approximately 200 appointments were made for Project Access members to AHC physicians' offices within five miles of Takoma Park. Project Access members in Takoma Park will be able to seek care in their community and be referred to AHC's many local specialists and other specialists

who also participate in the program. Opening a primary care office in Takoma Park will expand access to care for vulnerable individuals who may be limited in their health care options.

The primary care model is rooted in the principles of integration and coordination between clinical care practitioners, patients, and community service providers. The vision of AHC is to build capabilities in primary care practices that will allow them to improve outcomes, reduce costs, and optimize patient experience. Using a powerful analytics tool, we can aggregate clinical data to identify patterns of healthcare issues impacting a community and develop strategic interventions to address these issues on a communal scale. These capabilities include coordination of evidence-based clinical, psychological, and social services interventions.

AHC has an associated community health and wellness division which provides targeted community-based health education programs and wellness screenings. AHC also offers free, targeted community behavioral health workshops. These clinics are offered in-person and, leveraging the telehealth platform, can now be offered virtually as well. Topics have included Coping with Stress, Anxiety and Depression, Mindful Eating, Mindfulness, Coping with Loneliness, and Grief & Loss (see Exhibit G). These approachable and accessible workshops have had strong attendance and have led several participants to pursue medication and/or psychotherapy services. AHC hosted 48 workshops in 2021 and 13 in the first quarter of 2022. Workshops are offered in English and Spanish but can be targeted to meet the needs of other ethnic communities. AHC will work with

community leaders to identify and reach out to communities in need and offer culturally appropriate services such as for the Ethiopian, French African, and Hispanic communities in Takoma Park.

AHC is committed to promoting the new primary care office to help ensure its success. We have developed a comprehensive marketing plan that includes traditional marketing via television, the internet, and print publications as well as direct community engagement with local businesses and community support organizations. See page 13 of Exhibit A for a detailed description of this plan.

Additional information on the operations of the primary care center and how these services compare to the services of the urgent care can be found in the proposal submitted to the City of Takoma Park attached here as Exhibit A. The AHC primary care model results in high quality, patient centered care and supports overall community health.

ii. Behavioral Health Crisis Response

AHC supports the City of Takoma Park's desire to establish a behavioral health crisis response center to serve individuals experiencing acute behavioral health episodes. City representatives clearly expressed a desire for local behavioral health crisis services, and while AHC does not provide this service directly, we will support the City's effort to establish this service. The crisis response center is being pursued through a partnership between the City of Takoma Park and Montgomery County representatives. Both have agreed that this service is needed and have identified public funds that can be used to establish an interim crisis center in the

City. One of the primary hurdles to moving this forward has been identifying an appropriate place to house the center. To that end, AHC will donate the physical space required. AHC has two units available in the medical office building on the former hospital campus² and AHC behavioral health clinical leaders have determined that they are both suitable for this purpose. AHC will also assist in recruiting the medical personnel to staff the center. Crisis center staff will not be employed by AHC, but we will leverage our access to the pipeline of behavioral health workers to help recruit the appropriate medical personnel. AHC will continue to work with City and County officials on this effort.

Additionally, AHC has connected Takoma Park representatives to the Nexus Montgomery Behavioral Health Workgroup that is examining behavioral health access across the County. This is a coalition of the Montgomery County Health Department and the County's four hospital systems. AHC supports ensuring that Takoma Park has a role as strategies are developed to address behavioral health access countywide.

D. CONTINUED COMMITMENT TO TAKOMA PARK

AHC has served the healthcare needs in Takoma Park since 1907 and remains committed to doing so. Throughout the COVID-19 pandemic, AHC has provided services to the community including free COVID testing, inpatient care, an

² These two units are in addition to the space currently set aside for the primary care office.

outpatient COVID-19 infusion center, and a robust Community Vaccination Clinic that administered over 20,000 doses to the community.

AHC has also continued to operate the Manor House in the City. The Manor House is an assisted living facility for adults with chronic and severe mental illness who are unable to live independently in a safe and supportive residential environment as an alternative to long-term psychiatric hospitalization.

Additionally, AHC provided free space on the former hospital campus to four different community organizations and the City of Takoma Park to support food distribution efforts in the community. We also recently contributed approximately \$12,000 in staff and supplies to support flu vaccinations in the area.

E. CONCLUSION

AHC is proud of its history of service to the residents of Takoma Park. Through collaboration and partnership with City leadership, we have developed a plan to provide valuable, needed services in Takoma Park for years to come. AHC respectfully requests the Commission approve this petition.

Andrew R. Nicklas, Esq.
Deputy General Counsel
Adventist HealthCare
820 W. Diamond Avenue
Suite 600
Gaithersburg, MD 20878

Certificate of Service

I hereby certify on this 6th day of May 2022 a copy of the Request For Approval
To Modify A Certificate Of Need Condition was emailed to

Wynee Hawk, Chief
Certificate of Need Section
Maryland Health Care Commission
wynee.hawk1@maryland.gov

Andrew R. Nicklas