

January 26, 2018

Via Email (dph.don@state.ma.us)

Nora Mann, Esq.
Director, Determination of Need Program
Department of Public Health
250 Washington Street, 6th Floor
Boston, Massachusetts 02108

**RE: DoN Project 17102515-TO
Written Comments to the Staff Summary Pursuant to 105 CMR 100.510(C)**

Dear Attorney Mann:

I am writing on behalf of AdCare, Inc., the Applicant, in the above referenced DoN Project. The Applicant submits the following written comments pursuant to 105 CMR 100.510(C) in response to the Staff Report prepared in accordance with 105 CMR 100.510 and distributed on January 22, 2018.

Other Condition #1

The Applicant respectfully requests that the Department remove the reference to AAC's commissioned independent longitudinal three-year study, as it is complete and a new assessment will be developed for the Hospital. We request that the Department revise the condition as follows:

- "The Holder shall perform an outcomes assessment for the Hospital, and:
- a. in its first report mandated by 105 CMR 100.310(L), submit to the Department a report that details, for each outcome assessment; the baseline measures; expected benchmarks; measure specifications; and the anticipated time to meet goals; and
 - b. each subsequent year report on those outcomes."

Other Condition #2


The Applicant respectfully requests that the Department clarify that the Holder's payer mix shall not appreciably change, and revise the condition as follows:

"The Holder shall continue its participation in public payer contracts and report annually on its Medicare (fee for service and MCO), Medicaid (fee for service and MCO), and commercial payer mix. The Holder's payer mix shall not appreciably change from year to year."

Attorney Nora Mann
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Thank you for your consideration of these changes. Please feel free to reach out if additional clarification is needed.

Sincerely,



Emily Kretchmer

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