

June 19, 2020

Ron Escarda
UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406-0958

Re: NEWCO Oregon, Inc. (CN #682) – Application Completeness

Dear Mr. Escarda:

The program has reviewed the additional materials submitted on April 17, 2020 regarding the Certificate of Need (CN) application that NEWCO has submitted for a proposed 100 bed psychiatric facility to be located in Wilsonville, Oregon. The program has determined that the application is incomplete or requires an explanation in the following areas:

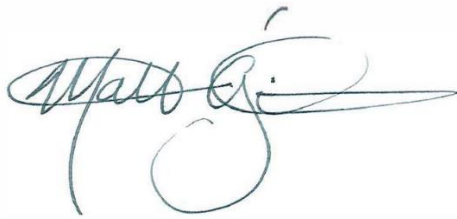
1. The certificate of need evaluation process includes reviewing whether the proposed project will improve patient's reasonable access to services. OAR 333-580-0040(3). The April 17 materials listed the organizations and the type of relationships the proposed facility will have or has with other health care organizations within the behavioral health community. The April 17 materials also stated that community investments will double after the proposed project is operational and the proposed hospital will "fully integrate" into the community and regional health care continuum. The application states that, "Willamette Valley Behavioral Health, through its proposed comprehensive set of inpatient and outpatient services, will increase inpatient psychiatric care capacity and add to and improve community-based outpatient services." To facilitate the certificate of need evaluation of the criteria described above, please provide a detailed description of how the proposed project will improve and expand the existing community-based care services currently available.

2. An element of adequately serving the behavioral health needs in Oregon is the ability to find appropriate community placement after inpatient psychiatric hospitalization. This can be particularly difficult for Medicaid and Medicaid-eligible clients. UHS maintains both inpatient and outpatient programs in a number of states. To facilitate the certificate of need evaluation of the criteria described above, and in light of the certificate of need criteria focus on access by public-paid patients, please provide detailed information as follows:
 - a. What strategies will be used to increase the percentage of Oregon Health Plan psychiatric admissions to assure the patient mix at the proposed facility would be in line with other metro area psychiatric hospitals?
 - b. In states, other than in Oregon and Washington, what percentage of UHS inpatients are placed into UHS outpatient services upon discharge?
 - c. Additionally, what percentage of UHS Medicaid inpatients are placed into UHS outpatient programs upon discharge?
3. Given the recent events and anticipated changes to behavioral health services in Oregon due to COVID-19, please provide any additional information about the service area population's need for the proposed project, improvement in patient's reasonable access to services, whether sufficient qualified personnel are available to support the proposed project, and any other criteria addressed in the original application that have been affected by the pandemic.

Thank you for your continued communication regarding this matter. Please contact me if you have any questions regarding this letter or review of your application. We expect that after receiving the information specified in this letter, the program can rule on the completeness of your application and move forward with review as appropriate.

We appreciate your continued cooperation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matt Gilman", with a long horizontal flourish extending to the right.

Matthew Gilman, MPPA
Facilities Planning and Safety Program Manager
Health Care Regulation and Quality Improvement
Oregon Health Authority
Public Health Division
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cc: Frank Fox, Consultant for NEWCO Oregon, Inc.
Andre Ourso, Oregon Public Health Division
Dana Selover, Oregon Public Health Division
Pam Krecklow, Oregon Public Health Division
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Shannon O'Fallon, Oregon Department of Justice
Erin Williams, Oregon Department of Justice