

SAMPLE OPPOSITION LETTER
C.O.N. 10095

[DATE]

Mr. Jeffrey Gregg
Bureau Chief, Health Facilities Regulation
Agency for Health Care Administration
2727 Mahan Drive
Tallahassee, FL 32308

Re: C.O.N. 10095

Dear Mr. Gregg:

On behalf of [**Insert organization name here**], I am well acquainted with the need and demand for behavioral health services in my community and send this letter to voice my concerns regarding the pending C.O.N. Application No. 10095 by Haven Behavioral Healthcare, Inc. to build a free standing 30-bed psychiatric hospital in Lake County, FL. For the following reasons I would urge you to oppose the application.

UNMET NEED. Lake County is currently serviced by a single free-standing 46-bed psychiatric facility owned and operated by LifeStream Behavioral Center, Inc. LifeStream is a nationally recognized behavioral health provider and has been providing the community with quality behavioral services for nearly 40 years and serves as a non-profit community mental health center and designated Baker Act facility. LifeStream currently has an occupancy rate that averages approximately 60% of available beds. The remaining 40% of the beds represent unmet need. It is with some surprise, therefore, that we learned of Haven's application to the State for additional adult psychiatric beds in Lake County, Florida. C.O.N. 10095 would nearly double the number of existing adult psychiatric beds being utilized at the expense of a proven provider – LifeStream Behavioral Center. With critical shortages in nursing and other ancillary staff, LifeStream's ability to continue its present services could be severely jeopardized as a result of the greater staffing demands that would unnecessarily be placed upon this area's limited staffing pool.

FISCAL INTEGRITY. Life Stream is an established not-for-profit organization in Lake County, serving Lake and Sumter Counties. Approximately one-half of LifeStream's admissions are referrals from law enforcement agencies. These patients frequently have Medicaid coverage only. Such patients are treated by LifeStream without charge to the State. Conversely, C.O.N. 10095 is a proposed **for-profit** facility whose care and treatment of such patients would be done at cost to the State. In these times of budgetary constraints, such unnecessary expenses should be avoided. I believe the proposed C.O.N. 10095 should be denied.

SCOPE OF SERVICE. Also of note are the differences in services that would exist between LifeStream and the proposed adult inpatient psychiatric facility if C.O.N. 10095 is approved. LifeStream, as a Community Mental Health Center and designated Baker Act facility, is able to offer a full range of services to the mentally ill. These include hospitalization, medical,

rehabilitation, residential, care management and therapy services. The proposed for-profit facility would likely not be able to include this full scope of services. As such, the efficiency and effectiveness of behavioral health services in this area may be compromised leading to increased costs for services delivered.

Based upon the above, there does not appear to be a need for a new adult inpatient psychiatric hospital as proposed by the applicant. AHCA should deny this application.

Sincerely,

(Insert name)

(Insert title)

cc: James McElmore, Supervisor
Certificate of Need Office
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