



**Behavioral Health Services Advisory Council
OASAS Project Review Agenda
June 26, 2024**

Provider: Integrity Counseling, LLC
TYPE: New OASAS Provider- Part 822 Outpatient Services
Project #: CA #2024.006
Staff: Jeffrey Caputummino

Provider: Visiting Nurse Service of New York as Active Parent, VNS Health Behavioral Health, Inc. as Operator
TYPE: New OASAS Provider- Part 822 Outpatient Services
Project #: CA #2024.010
Staff: Jeffrey Caputummino

Provider: Arms Acres, Inc.
TYPE: Change In Ownership
Project #: CA # 2023.048
Staff: Jeffrey Caputummino

Provider: Conifer Park, Inc.
TYPE: Change In Ownership
Project #: CA # 2023.049
Staff: Jeffrey Caputummino

Provider: Groups Recovery Together – New York LLC
TYPE: New OASAS Provider- Part 822 Outpatient Services
Project # CA 2023.035
Staff: Bradford Ellis

Provider: Statcare Urgent & Walk-in Medical Care d/b/a Nano Medical
TYPE: New OASAS Provider- Part 822 Outpatient Services
Project# CA# 2023.053
Staff: Bradford Ellis

Project: Brooklyn Cares Addiction Center LLC
TYPE: New OASAS Provider- Part 822 Outpatient Services
Project # CA# 2023.029
Staff: Bradford Ellis

Project: The Richmond Center for Recovery and Wellness, LLC
TYPE: New OASAS Provider- Part 818 Inpatient Rehabilitation and Part 816 Stabilization and Withdrawal Services
Project # CA# 2024.003
Staff: Brian Grandy

**New York State Office of Addiction Services and Supports
Bureau of Certification (OASAS)**

M E M O R A N D U M

TO: Dena Holmes
FROM: Jeffrey Capitulo
DATE: May 9, 2024
SUBJECT: Application Review

Applicant: Integrity Counseling LLC

Application # CA: 2024.006 / NYSECON: 244006

Purpose: New OASAS Provider

County: Nassau

Project Summary:

Integrity Counseling LLC submitted a Certification Application requesting New York State Office of Addiction Services and Supports' (OASAS) approval for a New OASAS Provider of Part 822 Outpatient substance use disorder (SUD) services located at 2250 Grand Ave, Baldwin, NY 11510. Integrity Counseling proposes to begin operating OASAS-certified outpatient services that focus on providing support and treatment to those suffering from substance use disorder with a team comprised of local physicians, nurses, recovery coaches, and therapists. Program hours will be Monday through Friday, 9 am to 9 pm.

Need:

The applicant submits that the latest statistics from the Centers for Disease Control and Prevention, up to April 2023, reveal an overdose rate in Nassau County of 16.1 per 100,000 residents, with Fentanyl detected in 80% of these overdoses between May 2022 and April 2023. This rate increased from 12.1 per 100,000 residents to 52% in 2018-2019, "underscoring the rapid escalation of this devastating epidemic."

According to the New York State Department of Health's Nassau County Opioid Quarterly Report, published in April 2022, from January 2021 through December 2021, Nassau County tragically experienced 177 deaths related to opioid overdoses. In their Quarterly Report, Nassau County revealed 473 emergency room visits due to opioid overdoses. Also, the report discovered that the number of admissions to OASAS-certified chemical dependency treatment programs for any opioid was 2,766.

Integrity Counseling reports that, currently, there are no OASAS-certified Part 822 outpatient programs in Baldwin, NY, which "makes Integrity Counseling a vital resource for the community." They further report that "while there are ten Part 822 outpatient SUD treatment programs within a 5-mile radius, most are concentrated in the Town of Hempstead, a few miles north of this proposed location." The OASAS Long Island Regional Office confirms Integrity's report on the number of Part 822 programs within five-mile proximity of the applicant's proposed location, with the majority concentrated in the Hempstead area.

On September 26, 2023, Ben Jackson, President of the Freeport Chamber of Commerce, sent Integrity Counseling a letter of endorsement for their OASAS application.

On October 2, 2023, Denise Ford, Nassau County Legislator (District #4), sent the applicant a letter expressing "wholehearted support for the opening of Integrity Counseling Center located in Baldwin, Nassau County" and that "supporting and facilitating the smooth opening and operation of Integrity Counseling is not only strategic but imperative for the well-being of our communities."

On October 3, 2023, Tanya Mir, Attorney with the Nassau County Family Court, sent a letter to the applicant expressing her "full support for the Integrity Counseling Center."

On October 12, 2023, Congressman Anthony Esposito, Representative for New York's 4th Congressional District, sent a letter of support for this applicant and their proposed Part 822 services in Nassau County.

On October 17, 2023, Patricia M. Canzoneri-Fitzpatrick, State Senator, 9th Senate District, sent a letter to the applicant recognizing their application and remarking, "Substance and alcohol treatment and counseling are in high demand as substance use continues to increase among all demographic groups in Nassau County. This facility has the potential to be a pivotal resource for individuals in the South Shore area and throughout Nassau County who are seeking treatment."

Integrity Counseling's application was further supported by letters recommending application approval from Brendan Loftus, the Member Assistance Director of the International Union of Elevator Constructors (Local #1), Jim Dufficy, the Ironworkers (Local 40, 361, & 417) Member Assistance Program Coordinator, and Anthony Luciano, the Member Assistance Program Director for the Communications Worker of America. Brad Regenbogen, Esq, Retired Former Bureau Chief of the District Court of The Town of Hempstead, Long Island, sent a letter of support to Integrity Counseling supporting this application.

The Nassau County Office of Mental Health, Chemical Dependency & Developmental Disabilities Services recommendation in support of this application was received on April 29, 2024.

The Long Island Regional Office's recommendation in support of this application was received on May 7, 2024. The Regional office commented in their recommendation that " The Long Island region continues to experience an opioid crisis and the need for services."

Character and Competence:

Integrity Counseling LLC was established as a Domestic Limited Liability Company on July 27, 2023 with a Governing Authority consisting of three members (shares of stock and voting rights in parenthesis): Joshua Goldfeder (45%) the Chief Executive Officer (CEO) is a business owner in the local community; Jonathan Raymond Anderson (45%) has been a Union elevator mechanic since 2014; and Michael Mechow, (10%) Chief Clinical Officer, is a Credentialed Alcoholism and Substance Abuse Counselor (CASAC). Michael worked as a case manager from January 2014 to August 2022 at Seaford Mineola, an outpatient SUD treatment program in Mineola, NY. In August 2022, he changed employers to begin working at the Nassau County Family Treatment Court as a case manager. Michael meets the OASAS required experience in substance use disorder services.

Overall Financial Condition of the Provider:

The proposed annual budget identifies revenues at \$1,028,099 and expenses at \$643,309.92 leaving a total of \$384,789.08 in profit.

The OASAS Long Island Regional Office did not report concerns after a review of the applicants budget.

The applicant submitted the required documentation demonstrating available sufficient funding for the initial six months, while the program gets underway.

Adequacy:

The lease provided by Integrity Counseling LLC has been reviewed and found to contain the OASAS required right to re-entry language.

A State Environmental Quality Review (SEQR) was completed by the OASAS Field Evaluation and Inspection Unit (FEIU) on January 30, 2024, and they determined the proposed program space will not require further environmental review. Also, on January 30, 2024, A floor plan review was completed which revealed that the applicants proposed program space meets requirements for the Part 822 program.

Compliance:

The applicant submitted a staffing plan for the proposed Part 822 outpatient location which meets regulatory requirements: one full-time Clinical Director (Qualified Health Professional or "QHP"), one full-time QHP (LMSW or LMHC), one full-time Registered Nurse (RN), one part-time Medical Director, one full-time Credentialed Alcoholism and Substance Abuse Counselor (CASAC), one full-time Certified Recovery Peer Advocate (CRPA), and one part-time Medical Director.

Policies and procedures have been reviewed for regulatory compliance and are accepted.

Continuity of Care:

Integrity Counseling will offer outpatient substance use disorder services, including screening, brief intervention, assessment, brief treatment, trauma-informed individual and group counseling, peer services, DWI & DUI screening/assessments/treatment, co-occurring services, medical screening, psychiatric evaluations, and Medication-Assisted treatment. They also propose to include ancillary withdrawal and telehealth as services offered. Primary counselors/case managers will work to engage clients in proactive, post-discharge continuing care planning that will incorporate medication management for those in need. Integrity plans to hire a bilingual (Spanish) LMSW/CASAC.

The Integrity Counseling medical director will address the need for psychiatric and medical services in consultation with assigned primary counselors and the treatment team. The medical director will manage medications for program clientele needs, including psychiatric and medication-assisted treatment. Integrity plans to refer out for more acute needs such as detoxification (Sunrise Detox Long Island), inpatient Rehabilitation and mental health (South Oaks Hospital), and methadone maintenance or opioid treatment programming (Nassau University Medical Center in East Meadow, NY); they will seek to establish memorandums of understanding (MOUs) with these and other community care providers.

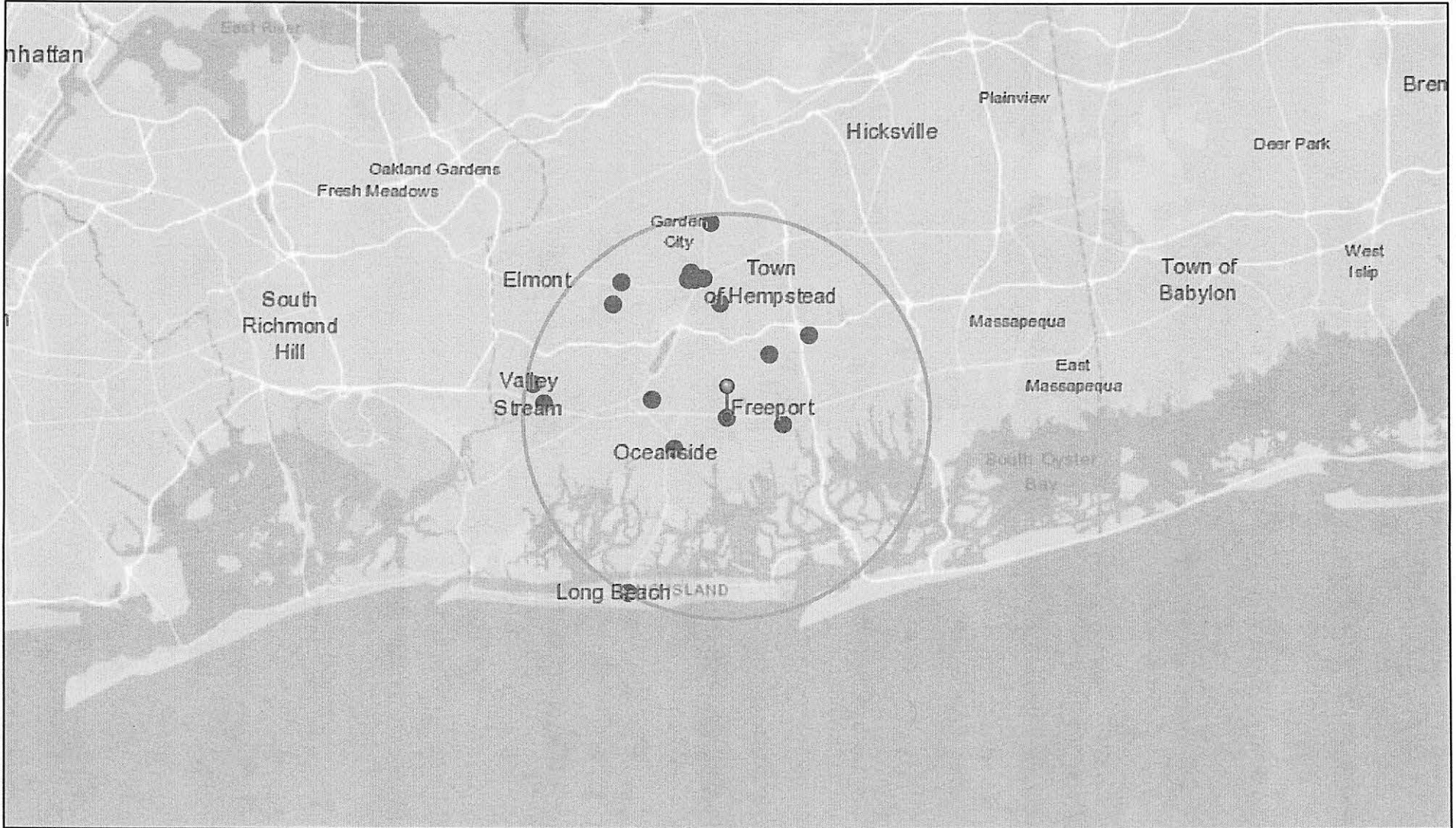
Recommendation:

OASAS recommendation is to approve the request from Integrity Counseling LLC to become a New OASAS provider of Part 822 Outpatient Services with the following contingencies:

- Verification of the hiring of sufficient staff to meet regulatory requirements.
- OASAS inspection and approval of the completed facility.
- Copy of filing receipt from the NYS Department of State indicating that the amended Articles of Organization, including the OASAS required language, have been filed.

Attachments: LGU recommendation, map

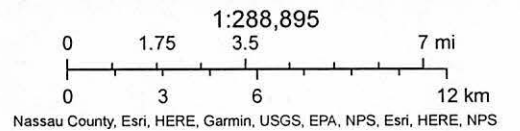
Integrity Counseling LLC



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Certified SUD Outpatient Treatment Programs (includes additional locations)

● Outpatient Clinic



NEW YORK STATE OFFICE OF ADDICTION SERVICES AND SUPPORTS
LOCAL GOVERNMENTAL UNIT REVIEW REPORT
(Addiction Disorder Services Certification Actions)

Applicant's Legal Name Integrity Counseling LLC	Application No. NYSECON #244006
Local Governmental Unit Long Island	
In conjunction with the certification action(s) submitted by the above applicant, you are requested to review and provide comments on the proposed actions relative to the provision of addiction disorder services in your jurisdiction. Your comments are important in evaluating the merits of the action(s). In completing the responses, use additional sheets as necessary. Your cooperation in providing complete and thorough responses is appreciated as incomplete replies will delay the processing of this application.	
1. Consistency of Program Description and Site Location with Local/OASAS Requirements	In the case of new providers and/or new services, is the program description and site location consistent with local/OASAS requirements: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below.
2. Provider Operational Performance	Is the operational performance of this provider satisfactory? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Regardless of the answer, provide a description of the operational performance of the provider below. Unknown. This is a new provider.
3. Adequacy of Financial Plans	Is the financial plan in the proposal adequate and acceptable? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below. The financial plan proposed on Attachment 1A presents as adequate. Where applicable, please note any comments related to Medicaid policy and/or reimbursement practices below.
4. Consistency with Local Plans and Local/Community Needs	Is the action consistent with local plans and/or does it meet community needs? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Provide explanation below.
5. Provider Standing in the Community	Is there any known information regarding the provider's standing in the community? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Applicable Regardless of the answer, provide all known information below or on additional sheets attached to this report.

<p>6.</p> <p>Program Location</p>	<p>In answering this question, the following should be taken into consideration:</p> <ul style="list-style-type: none"> (a) the location is suitable for an Addiction Disorder Treatment Program; (b) the accessibility of public transportation and adequate parking; and (c) any other notable observations. <p>Please describe your assessment of the circumstances noted.</p> <p>Unknown</p>	
	<p>Please check one box.</p> <p><input type="checkbox"/> LGU has visited the proposed location. Date of Visit: _____</p> <p><input checked="" type="checkbox"/> LGU has not visited, but has sufficient personal knowledge to attest to its suitability.</p> <p><input type="checkbox"/> N/A – Please explain, for example, N/A may be appropriate in applications that involve relocation within an existing building. However, factors such as capacity increase, even in an existing building, would not be appropriate for an “N/A” response.</p>	
<p>7.</p> <p>Current Status of Existing Programs</p>	<p>Are you aware of any community issues with other programs operated by this provider, or in the case of relocation, this program’s current location? (i.e., any issues around loitering, public safety, etc.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please describe any issues.</p>	
<p>8.</p> <p>Community Response</p>	<p>Please describe your knowledge of the applicant’s outreach to the local community (e.g., Community Service Boards, Community Boards, Planning Boards, Neighborhood Coalitions, other local municipalities). Please summarize your knowledge of community input, including any existing or likely community concerns, as well as any recommendations.</p> <p>Provider reported in Attachment 1A the support received from multiple entities, judges, and organizations.</p>	
<p>9.</p> <p>Other Comments</p>	<p>Provide additional comments.</p>	
<p>10.</p> <p>LGU Recommendation</p>	<p><input checked="" type="checkbox"/> Approve <input type="checkbox"/> Disapprove</p>	<p>Signature of Authorized LGU Official</p> <p><i>[Handwritten Signature]</i></p> <p>Date</p> <p>4/29/24</p>

**New York State Office of Addiction Services and Supports
Bureau of Certification (OASAS)**

M E M O R A N D U M

TO: Dena Holmes

FROM: Jeffrey Caputummino

DATE: May 21, 2024

SUBJECT: Application Review

Applicant: Visiting Nurse Service of New York as Active Parent, VNS Health Behavioral Health, Inc. as Operator

Application #: CA #2024.010 / CON #244010

Purpose: New OASAS Provider / Part 822 Outpatient Services

County: Bronx

Project Summary:

Visiting Nurse Service of New York as Active Parent, VNS Health Behavioral Health, Inc. as Operator, submitted a Certification Application requesting New York State Office of Addiction Services and Supports' (OASAS) approval to become a New OASAS Provider of Part 822 outpatient services, located at 489-493 East 153rd Street in the Bronx.

VNS Health Behavioral Health, Inc. recently received a four-million-dollar, four-year grant from the Substance Abuse and Mental Health Services Administration (SAMHSA) to establish a Certified Community Behavioral Health Clinic (CCBHC). VNS plans to integrate Substance Use Disorder (SUD) services with its existing Article 31 Office of Mental Health (OMH) licensed mental health outpatient treatment and rehabilitative services (MHOTRS) located in the South Bronx and known as the VNS Friends clinic, which services children, adolescents, adults, and families.

VNS Friends is located within the urban neighborhood of Mott Haven in the Bronx; the immediate surrounding neighborhood comprises predominantly commercial use space and parking structures. Surrounding the immediate commercially zoned area are several residential zones and one manufacturing zone.

The VNS Friends Clinic currently offers its New York State Office of Mental Health licensed Article 31 Mental Health Clinic services on Monday, Tuesday, Wednesday, and Thursday from 9:00 a.m. to 8:30 p.m., Friday from 9:00 a.m. to 6:30 p.m., and every Saturday from 9:00 a.m. to 5:00 p.m. Their proposed OASAS Part 822 services will serve adolescent and adult clients

and share the same clinic hours; however, adolescents will have separate waiting and therapy areas.

Need:

In their 2023 County Plan, the NYC Department of Health and Mental Hygiene identified the goal of reducing substance use-related morbidity and mortality in NYC, focusing on neighborhoods experiencing the highest burden of drug overdose death, primarily high-poverty localities comprised of Black and Latinx communities. The Mott Haven neighborhood of the Bronx is home to a significant minority population: of the approximately 96,584 people, 74% are Latino, and 24% are African American.

The applicant reports that in the South Bronx, the overdose death rate is 131% higher than the overall New York City rate. The applicant cites data from both SAMHSA and OASAS reporting that 37.9% of adults and 76% with SUD have a co-occurring mental disorder. The applicant also references a report from the Journal of the American Medical Association on February 5, 2024, titled Dual Diagnosis: Substance Abuse and Mental Health, which suggests that " 37% percent of alcohol abusers and 53% of drug abusers also have at least one serious mental illness."

Of the nine existing SUD outpatient programs within the South Bronx, three provide integrated mental health services, and two are equipped to treat adolescents; however, no programs in this area offer both integrated mental health services and serve adolescents. Additionally, of the three programs that provide integrated mental health services, only one provides services on evenings and weekends. VNS is designing its CCBHC to address these gaps in the local treatment landscape by delivering integrated mental health and substance use treatment services to adults and adolescents, including weekend and evening service hours.

On November 14th, 2023, the applicant introduced their plans to the Health, Human, and Senior Services (HHSS) Committee of Bronx Community Board #1. The Committee unanimously recommended that the Community Board provide VNS Health with a letter of support. Then, on November 30th, 2023, VNS presented their application to the entire Bronx Community Board (#1), receiving thirty votes in favor and one abstention. Additionally, the Board made recommendations to VNS, including recruiting and hiring Bronx residents, where possible, with competitive salaries and the importance of being vigilant against client loitering in the proposed area. Also, in November of 2023, the applicant emailed several local elected officials about this application proposal, requesting their support, and invited their questions and comments. The following elected officials provided letters of support:

- US Representative Ritchie Torres, NY-15
- NY Senator Nathalia Fernandez, 34th District and Chair, Alcoholism and Substance Use Disorders Committee
- NY Senator Luis R. Sepúlveda, 32nd District
- NY Assembly Member, Chantel Jackson, 78th District
- Bronx Borough President, Vanessa L. Gibson

Assembly Member Yudelka Tapia (86th District), Assembly Member George Alvarez (76th District), and NYC Council Member Rafael Salamanca, Jr. (17th District) did not respond to

the outreach attempt made by VNS to discuss their proposed Part 822 outpatient SUD services.

The New York City Department of Health and Mental Hygiene's recommendation in support of this application was received on April 23, 2024.

OASAS' New York City Regional Office's recommendation in support of this application was received on April 25, 2024.

Character and Competence:

Visiting Nurse Service of New York, or VNS Health (Parent), was established in 1983 as a Domestic Not-for-Profit Corporation. In addition to delivering behavioral health services for over 37 years, VNS Health reports offering a "full spectrum of services to meet the diverse needs of New Yorkers." Agency services include home care, hospice care, health plans, and care management. In 2022, VNS Health reported administering over \$65 million in charitable care and community impact programs. VNS Health is the parent corporation of an integrated system of affiliated entities providing various home and community-based health care and related services. VNS Health is the sole corporate member or otherwise exercises corporate control of each affiliated entity. Its Board of Directors consists of twenty-seven members, with Dr. Andrew N. Schiff serving as Chairman.

VNS Health Behavioral Health, Inc. (Operator) was established as a Domestic Not-for-Profit Corporation on June 27, 2023. Its Board of Directors consists of nine members, two of whom, Jeremy King LCSW, CASAC, and Michelle Soto, MD, MBA, meet the required OASAS experience in substance use disorder services. Historically, all behavioral health programming has operated under another VNS Health subsidiary; however, in 2023, VNS Health Behavioral Health, Inc. was established to serve as a new non-profit healthcare provider dedicated solely to providing behavioral health services, and simplifying and streamlining contracting, financials, business operations, data and outcomes monitoring.

According to the New York State Office of Mental Health, the Visiting Nurse Service of New York, throughout the five boroughs, operates six licensed mental health programs in good standing, including a satellite clinic with services for all age groups. According to their report, they employ more than 10,000 individuals who collectively speak more than fifty languages. In 2022, VNS reports that over 20,000 New Yorkers, including almost 5,000 Bronx residents, utilized their behavioral health services. Notably, in 2022, per the applicant's report, the VNS Friends location, where the proposed Part 822 services will co-locate, provided behavioral health services to over 3,000 residents.

Overall Financial Condition of the Provider:

The OASAS Fiscal Audit and Review Unit completed a fiscal review of VNS Health Behavioral Health, Inc. on March 27, 2024, and the results suggested fiscal viability with the capability to sustain new treatment services while starting up.

OASAS' New York City Regional Office reviewed the proposed budget and reported "no concerns."

The applicant reports, "The pre-operational operating budget is almost entirely funded by a SAMHSA grant to establish a Certified Community Behavioral Health Clinic (CCBHC). The proposed SUD services will leverage the existing resources of VNS Health Behavioral Health's care delivery programs and the financial support for the CCBHC to establish the appropriate infrastructure required for the operation of integrated mental health and outpatient SUD treatment."

Adequacy:

VNS submitted a lease for the proposed location that contained the required OASAS right-to-re-entry language.

The OASAS' Facilities Evaluation and Inspection Unit (FEIU) performed a State Environmental Quality Review (SEQR) of the proposed space on February 22, 2024, and found that it did not require further environmental review.

On February 22, 2024, the OASAS FEIU reviewed and approved the proposed floor plan.

Compliance:

The applicant submitted a staffing plan for the proposed Part 822 outpatient location which meets regulatory requirements: one full-time Clinical Director (Qualified Health Professional or "QHP"), one full-time Program Supervisor (Licensed Clinical Social Worker or LCSW), one part-time Medical Director, three full-time Credentialed Alcoholism and Substance Abuse Counselors (CASAC), one full-time Certified Recovery Peer Advocate (CRPA), and one part-time Nurse Practitioner (NP).

Policies and procedures have been reviewed for regulatory compliance and are accepted by OASAS.

Continuity of Care:

The VNS CCBHC model relies on collaborative partnerships within the healthcare system to provide comprehensive community-based care for any patient regardless of ability to pay. By incorporating the proposed SUD services into their broader service model, internal and external care provider partners in and around the South Bronx will now have a reliable resource for their patients and clients to receive outpatient SUD care and an array of integrated mental health care and support services. VNS Health has, or is developing, linkage agreements with local hospitals such as Lincoln Hospital, Montefiore Medical Center Hospital, and the St. Barnabas Hospital. The applicant will pursue linkage agreements with other community SUD and human service providers, including the Acacia Network, Argus Community, BronxCare, and the Elev 8 Centers.

VNS reports that its services are person-centered and responsive, appropriate to each person by considering developmental, ethnic, cultural, and linguistic needs. They will utilize integrated treatment approaches that are modern, applicable, and evidence-based in individual, group, and family sessions with available peer support services. VNS will employ a harm reduction philosophy: not requiring clients to declare the goal of or requiring abstinence from substance use to participate in program services. VNS will retain on-site naloxone kits as part of their emergency response plan and offer kits for off-site use. They also propose to include ancillary withdrawal and telehealth as services provided in addition to medication management, including medication-assisted treatment.

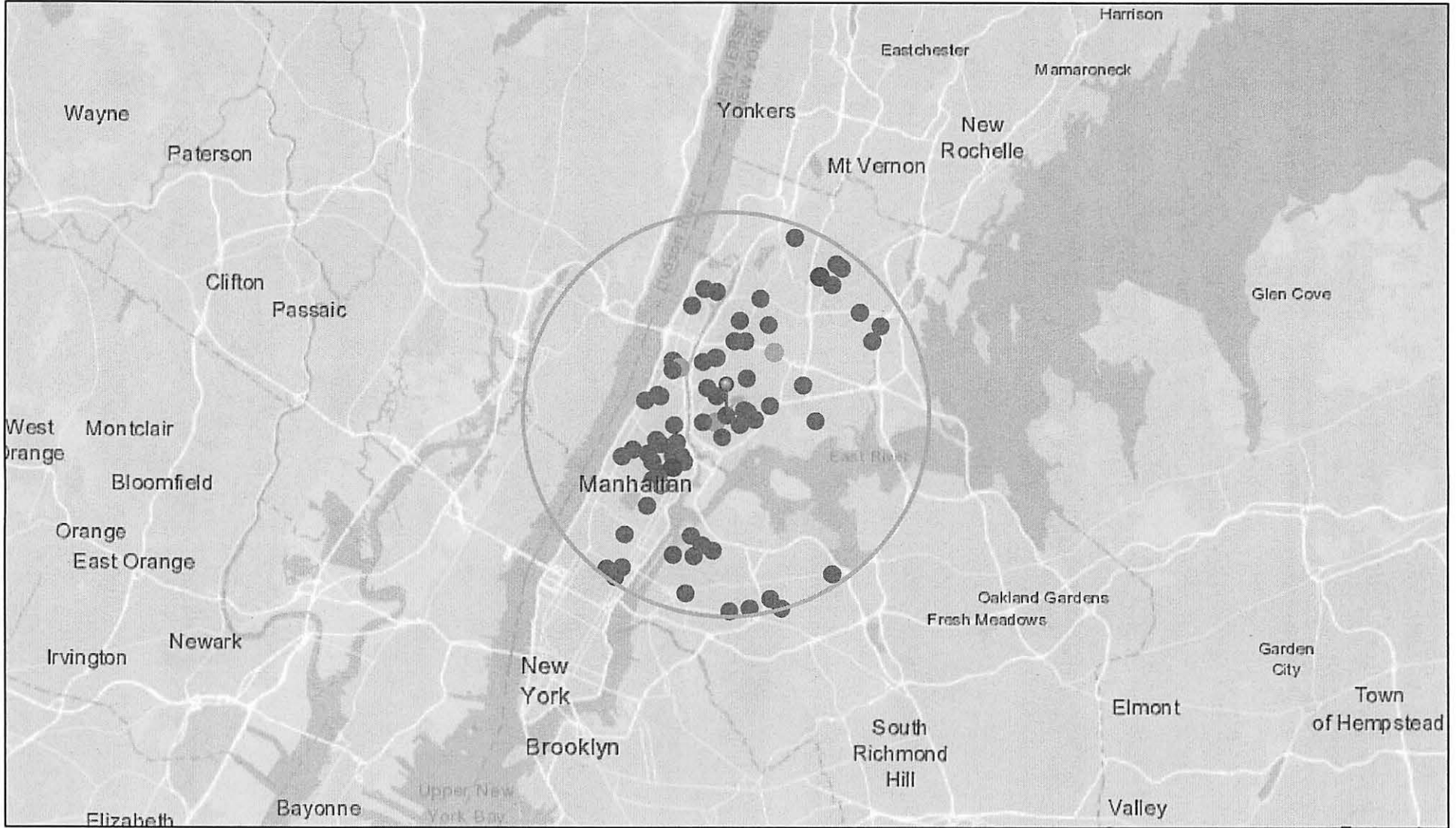
Recommendation:

OASAS recommendation is to approve the request from Visiting Nurse Service of New York as Active Parent, VNS Health Behavioral Health, Inc. as Operator to become a New OASAS provider of Part 822 Outpatient Services with the following contingencies:

- Verification of the hiring of sufficient staff to meet regulatory requirements.
- OASAS inspection and approval of the completed facility.
- Copy of filing receipt from the NYS Department of State indicating that the amended Certificate of Incorporation/Articles of Organization, including the OASAS required language, have been filed.

Attachments: LGU recommendation, map

Visiting Nurse Service of New York as Active Parent, VNS Health Behavioral Health, Inc. as Operator

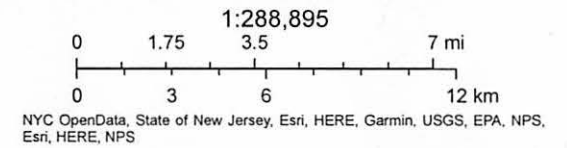


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Certified SUD Outpatient Treatment Programs (includes additional locations)

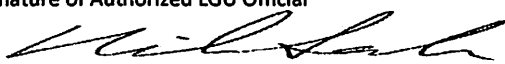
- Outpatient Clinic
- Crtd Cmty Behavioral Hlth Cnrc

- Outpatient Rehabilitation
- Diversion Center
- Specialized Services Outpt Rehab



NEW YORK STATE OFFICE OF ADDICTION SERVICES AND SUPPORTS
LOCAL GOVERNMENTAL UNIT REVIEW REPORT
(Addiction Disorder Services Certification Actions)

Applicant's Legal Name VNS Health Behavioral Health, Inc.	Application No. 244010
Local Governmental Unit New York City Department of Health and Mental Hygiene (DOHMH)	
In conjunction with the certification action(s) submitted by the above applicant, you are requested to review and provide comments on the proposed actions relative to the provision of addiction disorder services in your jurisdiction. Your comments are important in evaluating the merits of the action(s). In completing the responses, use additional sheets as necessary. Your cooperation in providing complete and thorough responses is appreciated as incomplete replies will delay the processing of this application.	
1. Consistency of Program Description and Site Location with Local/OASAS Requirements	<p>In the case of new providers and/or new services, is the program description and site location consistent with local/OASAS requirements: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below.</p> <p>VNS Health Behavioral Health, Inc. is proposing to open a new Part 822 treatment program in their FRIENDS Building located at 489-493 E153rd St. Bronx, NY 10455. The program will provide individual, group, and family counseling; peer support services; and MAT (including buprenorphine) to adolescents and adults. The program will become an OOPP and provide Naloxone to participants and the community. They received a grant from SAMHSA to open a Certified Community Behavioral Health Clinic (CCBHC) that will provide both SUD and mental health services. They will apply for an IOS license and integrate services once the 822 program is established.</p>
2. Provider Operational Performance	<p>Is the operational performance of this provider satisfactory? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Regardless of the answer, provide a description of the operational performance of the provider below.</p> <p>This is not an allocated provider and the Department can only go by the information provided in the application, which appears to indicate that operational performance of this provider would be satisfactory.</p>
3. Adequacy of Financial Plans	<p>Is the financial plan in the proposal adequate and acceptable? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below.</p> <p>This is not an allocated provider and the Department can only look at the information provided in the application. This information appears to be acceptable.</p> <p>Where applicable, please note any comments related to Medicaid policy and/or reimbursement practices below.</p> <p>The provider intends to collect revenue from Medicaid Managed Care, Medicaid Fee for Service and private insurance.</p>
4. Consistency with Local Plans and Local/Community Needs	<p>Is the action consistent with local plans and/or does it meet community needs? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Provide explanation below.</p> <p>The Mott Haven and Melrose Neighborhoods of the South Bronx continue to have some of the highest prevalences of unintentional overdose deaths in all of New York City. Of the nine SUD outpatient treatment programs within a one mile radius of the proposed program site, only three offer integrated mental health/SUD treatment. There is only one program that offers SUD treatment for adolescents and none that offer integrated services for youth. Existing programs have limited operating hours on evenings and weekends.</p>
5. Provider Standing in the Community	<p>Is there any known information regarding the provider's standing in the community? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Regardless of the answer, provide all known information below or on additional sheets attached to this report.</p> <p>The VNS organization has been providing health care and social service programming in New York City for over 130 years. The Behavioral Health division currently operates 18 programs throughout the city. The provider received letters of support from federal, state, and local government representatives as well as Bronx Community Board #1.</p>

<p>6.</p> <p>Program Location</p>	<p>In answering this question, the following should be taken into consideration:</p> <ul style="list-style-type: none"> (a) the location is suitable for an Addiction Disorder Treatment Program; (b) the accessibility of public transportation and adequate parking; and (c) any other notable observations. <p>Please describe your assessment of the circumstances noted.</p> <p>The proposed site is within the VNS Friends Building located at 489-493 E153rd St. Bronx, NY 10455. The neighborhood is a mixed residential/commercial area that is comprised of apartment buildings, local shops, restaurants, and a shopping center with national chain stores (grocery, pharmacy, clothing, and housewares). It is accessible via the NYC Subway 2 and 5 lines at 3rd Ave.- 149th St. station and Bx15 and Bx21 buses at 3rd Ave/E153rd street stop. Residential and paid street parking are available, and a municipal parking garage is also located around the corner.</p>		
	<p>Please check one box.</p> <p><input type="checkbox"/> LGU has visited the proposed location. Date of Visit: _____</p> <p><input checked="" type="checkbox"/> LGU has not visited, but has sufficient personal knowledge to attest to its suitability.</p> <p><input type="checkbox"/> N/A – Please explain, for example, N/A may be appropriate in applications that involve relocation within an existing building. However, factors such as capacity increase, even in an existing building, would not be appropriate for an “N/A” response.</p> <p>N/A</p>		
<p>7.</p> <p>Current Status of Existing Programs</p>	<p>Are you aware of any community issues with other programs operated by this provider, or in the case of relocation, this program’s current location? (i.e., any issues around loitering, public safety, etc.) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please describe any issues.</p> <p>VNSNY faced a federal lawsuit in 2014 in which a whistle blower alleged that the home care services program committed Medicare and Medicaid fraud by accepting clients that they did not have the capacity to care for and billing for services that were not delivered. In 2020, the organization settled and agreed to pay \$57 million to the federal government and NY state.</p>		
<p>8.</p> <p>Community Response</p>	<p>Please describe your knowledge of the applicant’s outreach to the local community (e.g., Community Service Boards, Community Boards, Planning Boards, Neighborhood Coalitions, other local municipalities). Please summarize your knowledge of community input, including any existing or likely community concerns, as well as any recommendations.</p> <p>The provider presented their plans to Bronx Community Board #1 on 11/30/23, and the board provided a letter of support dated 12/19/23. The provider also received letters of support from US Representative Ritchie Torres (NY-15), NY Senator Nathalia Fernandez (34th District and Chair, Alcoholism and Substance Use Disorders Committee), NY Senator Luis Sepulveda (32nd District), NY Assembly Member Chantel Jackson (78th District), and Bronx Borough President Vanessa Gibson.</p>		
<p>9.</p> <p>Other Comments</p>	<p>Provide additional comments.</p> <p>N/A</p>		
<p>10.</p> <p>LGU Recommendation</p>	<p><input checked="" type="checkbox"/> Approve <input type="checkbox"/> Disapprove</p>	<p>Signature of Authorized LGU Official</p> 	<p>Date</p> <p>4/23/24</p>

**New York State Office of Addiction Services and Supports
Bureau of Certification (OASAS)**

M E M O R A N D U M

TO: Dena Holmes
Director, Bureau of Certification

FROM: Jeffrey Caputummino

DATE: April 22, 2024/June 11, 2024

SUBJECT: Application Review
Applicant: Arms Acres, Inc.
Application # 2023.048 / NYSECON # 234060
Purpose: Change in Ownership
County: Bronx, Putnam, Queens

Project Summary:

Arms Acres, Inc. submitted a Certification Application requesting the New York State Office of Addiction Services and Supports' (OASAS) approval for a Change in Ownership affecting six Operating Certificates where services are provided across three counties.

The proposed ownership structure will be composed of nine individuals, each with a specific percentage of ownership: Robert Meisner (25%), Michael Meisner (25%), Eliyahu Zev Kohn (25%), Joel Basch (10%), Yosef Rabinowitz (5%), Steven Berger (2.5%), Issac Greenfeld (2.5%), David Levitan (2.5%), and Daniel Turkel (2.5%).

According to the applicant, the current ownership structure, an Employee Stock Ownership Plan (ESOP) Trust, will sell all its shares to Upstate Recovery, LLC. Under the terms of the Stock Purchase Agreement, the ESOP Trust will sell its stock in Liberty to Upstate Recovery NY, LLC. Upstate Recovery LLC is owned by the same individuals seeking to acquire Arms Acres, Inc. Following the transaction's closing, the ESOP plan will terminate, and the ESOP Trust will receive the sale proceeds and continue until all the sale proceeds are distributed to its current members. After the conditions set forth in the Stock Purchase Agreement are completed, Upstate Recovery, LLC will transfer its ownership interests in Arms Acres to the nine individuals listed above. These nine individuals will become the direct and sole owners of Arms Acres, Inc. The Stock Purchase Agreement refers to an administrative services agreement being entered into with GHR Group, LLC, and Arms Acres, Inc.

Need:

Program services are already in existence and according to the OASAS Client Data System, Arms Acres, Inc. has admitted 4,040 clients for substance use disorder (SUD) therapy throughout its care system since January 1, 2023, demonstrating the continued need for the services.

The current CEO of Arms Acres, Patrice Wallace-Moore, emailed a formal letter informing the Queens Community Board #12 of the proposed action on July 19, 2023. On July 20, 2023, The Queens Community Board #12 emailed Arms Acres an acknowledgment of the proposed ownership change. Also, on July 20, 2023, Thais Mitchell, Director of Outpatient Operations and Quality for Arms Acres, Inc., was notified by Karla Cabrera, District Manager for the Bronx Community Board #7 of the applicants plan to change their ownership after email notification. There were no other formal acknowledgments of these changes received by any other community members in other affected counties.

A request for final recommendation from the NYC Department of Health and Mental Hygiene's was sent by the OASAS Bureau of Certification on April 10, 2024, but has not yet been received.

A request for final recommendation from the Putnam County Mental Health Services was sent by the OASAS Bureau of Certification on April 10, 2024, but has not yet been received.

A request for Recommendation from the OASAS' Hudson Regional Office was sent by the OASAS Bureau of Certification on April 10, 2024, but has not yet been received.

A request for Recommendation from the OASAS' New York City Regional Office was sent by the OASAS Bureau of Certification on April 10, 2024, but has not yet been received.

Character and Competence:

Arms Acres, Inc., registered with the Department of State as a domestic business corporation in 1982 and has been an OASAS certified provider since that time. Arms Acres provides outpatient treatment services in the Bronx and Queens, as well as outpatient, opioid, inpatient (152 beds), and medically supervised withdrawal treatment services in Putnam County. Arms Acres holds six OASAS operating certificates:

1. Operating Certificate #10666, Outpatient Services, Carmel, NY. In good standing with OASAS.
2. Operating Certificate #11619, Outpatient Services, Bronx, NY. In good standing with OASAS.
3. Operating Certificate #10665, Outpatient Services, Jamaica, NY. In good standing with OASAS.
4. Operating Certificate #12074, Opioid Treatment Program, Carmel, NY. In good standing with OASAS.
5. Operating Certificate #10097, Inpatient Rehabilitation Services, Carmel. In good standing with OASAS.
6. Operating Certificate #11488, Medically Supervised Inpatient Withdrawal, Carmel. In good standing with OASAS.

The prospective individual owners below have ownership interest in OASAS-certified entities.

Yosef Rabinowitz:

Elev8 Center of New York, LLC (3.75%)

Two Operating Certificates in good standing:

New York County

OC# 251112151

Level of care: Part 818 Inpatient Rehabilitation Services

Niagara County

OC# 250312153

Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Services

Recovery Center of Niagara, LLC (40%)

Two Operating Certificates in good standing:

Niagara County

OC# 260712351

Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Services

Niagara County

OC# 260712350

Level of care: Part 818 Inpatient Rehabilitation Services

Steven Berger:

Elev8 Center of New York, LLC (3.75%)

Two Operating Certificates in good standing:

New York County

OC# 251112151

Level of care: Part 818 Inpatient Rehabilitation Services

Niagara County

OC# 250312153

Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Services

Urban Recovery House LLC (4.17%)

Two Operating Certificates in good standing:

Kings County

OC# 251112175

Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Service

Kings County

OC# 251212163

Level of care: Part 818 Inpatient Rehabilitation Services

Issac Greenfeld:

Urban Recovery House LLC (15%)

Two Operating Certificates in good standing:

Kings County

OC# 251112175
Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Service

Kings County
OC# 251212163
Level of care: Part 818 Inpatient Rehabilitation Services

David Levitan:

Elev8 Center of New York, LLC (3.75%)
Two Operating Certificates in good standing:
New York County
OC# 251112151
Level of care: Part 818 Inpatient Rehabilitation Services

Niagara County
OC# 250312153
Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Services

Urban Recovery House LLC (4.17%)
Two Operating Certificates in good standing:
Kings County
OC# 251112175
Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Service

Kings County
OC# 251212163
Level of care: Part 818 Inpatient Rehabilitation Services

Daniel Turkel :

Elev8 Center of New York, LLC (3.75%)
Two Operating Certificates in good standing:
New York County
OC# 251112151
Level of care: Part 818 Inpatient Rehabilitation Services

Niagara County
OC# 250312153
Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Services

Urban Recovery House LLC (4.17%)
Two Operating Certificates in good standing:
Kings County
OC# 251112175
Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Service

Kings County
OC# 251212163
Level of care: Part 818 Inpatient Rehabilitation Services

Joel Basch:

Surfpoint Recovery, LLC (40%)

Two Operating Certificates in good standing:

Kings County
OC#260912330
Level of care: Part 818 Inpatient Rehabilitation Services

Kings County
OC#260912331
Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Services

Recovery Center of Niagara, LLC (40% ownership stake)

Two Operating Certificates in good standing:

Niagara County
OC# 260712351
Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Services

Niagara County
OC# 260712350
Level of care: Part 818 Inpatient Rehabilitation Services

Urban Recovery House LLC (16.66% ownership stake)

Two Operating Certificates in good standing:

Kings County
OC# 251112175
Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Service

Kings County
OC# 251212163
Level of care: Part 818 Inpatient Rehabilitation Services

Elev8 Center of New York, LLC (15% ownership stake)

Two Operating Certificates in good standing:

New York County
OC# 251112151
Level of care: Part 818 Inpatient Rehabilitation Services
Niagara County
OC# 250312153
Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Services

Joel Basch is also the Chief Operating Officer of Elev8 Center of New York and meets the OASAS required experience in substance use disorder services.

Overall Financial Condition of the Provider:

OASAS' Fiscal Audit and Review Unit completed a fiscal viability review on March 19, 2024, and determined that Arms Acres, Inc. is fiscally viable.

Adequacy:

Arms Acres will maintain all its respective assets, as will Liberty Management of Metropolitan New York, Inc. (owner of the Arms Acres real estate and facility) and Liberty Management of the Capital District, Inc. (owner of the Conifer Park real estate and facility).

Compliance:

According to the applicant there will be no immediate changes to any of the service site locations, services provided, or operating budgets. Staffing patterns will remain unchanged.

Continuity of Care:

Arms Acres, Inc. is a private community provider of SUD services with inpatient and outpatient services to assist those negatively impacted by the disease of addiction. Program services include detoxification, Medication-Assisted Therapy, Psychiatric Services, Medication management, intake and referral services, Recovery Coaching, Fitness/Recreation, and aftercare planning.

Recommendation:

OASAS's recommendation is to approve the request from Arms Acres, Inc. for a Change in Ownership with the following contingencies:

- Copy of all current lease(s) for all certified locations between Liberty Management of Metropolitan NY and Arms Acres Inc. signed by new owners, including the required OASAS right-to-reentry language.
 - A lease was submitted for two of four properties signed by the new owners and included the required OASAS right to re-entry language.
- Submission of a copy of current and updated company by-laws.
- Submission of a copy of the fully executed Stock Purchase Agreement.
- Submission of documentation to demonstrate the transfer of ownership from Upstate Recovery, LLC., to the 9 individuals listed on the application.
- Final recommendation from the Local Government Unit (LGU) of the Putnam County Department of Health and Mental Hygiene.
 - The final Recommendation from the Putnam County LGU was received on April 23, 2024. The LGU recommended approval.
- Final recommendation from the Local Government Unit (LGU) of the New York City (NYC) Department of Health and Mental Hygiene.

- The final Recommendation from the NYC LGU was received on April 26, 2024. The LGU recommended approval.
- Final recommendation from the OASAS New York City Regional Office.
 - The final Recommendation from the OASAS NYC Regional Office was received on May 16, 2024. The Regional Office recommended approval.
- Final recommendation from the OASAS Lower Hudson Regional Office.
 - The final Recommendation from the OASAS Lower Hudson Regional Office was received on May 1, 2024. The Regional Office recommended approval.
- Completion of required background check for prospective owner Joel Basch.
 - The required background check for prospective owner Joel Basch was completed on May 6, 2024.
- OASAS review of the administrative services agreement between GHR, LLC and Arms Acres, Inc.
 - The applicant submitted a copy of a proposed administrative services agreement between Arms Acres, Inc. and GHR, LLC, which remains under OASAS review to ensure that any proposed services within the administrative contract do not require certification.

Attachments: LGU Recommendations. maps

NEW YORK STATE OFFICE OF ADDICTION SERVICES AND SUPPORTS
LOCAL GOVERNMENTAL UNIT REVIEW REPORT
(Addiction Disorder Services Certification Actions)

Applicant's Legal Name Arms Acres, Inc.	Application No. NYSE CON# 234060
Local Governmental Unit NYC Department of Health and Mental Hygiene	
In conjunction with the certification action(s) submitted by the above applicant, you are requested to review and provide comments on the proposed actions relative to the provision of addiction disorder services in your jurisdiction. Your comments are important in evaluating the merits of the action(s). In completing the responses, use additional sheets as necessary. Your cooperation in providing complete and thorough responses is appreciated as incomplete replies will delay the processing of this application.	
1. Consistency of Program Description and Site Location with Local/OASAS Requirements	In the case of new providers and/or new services, is the program description and site location consistent with local/OASAS requirements: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below. Arms Acres, Inc. and Conifer Park, Inc. are applying for a change in ownership to Upstate NY Recovery LLC which consist of 9 partners. There will be no changes to staffing or services. The proposed new owners meet all of the DOHMH criteria for advancing public health concerns regarding reducing risk for people who use drugs, including harm reduction education, naloxone, MAT with on-site access to buprenorphine.
2. Provider Operational Performance	Is the operational performance of this provider satisfactory? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Regardless of the answer, provide a description of the operational performance of the provider below. Arms Acres, Inc. is not an allocated provider and the Department can only look at the information provided in the application which appears to be satisfactory.
3. Adequacy of Financial Plans	Is the financial plan in the proposal adequate and acceptable? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below. Arms Acres, Inc. is not an allocated provider and the Department can only look at the information provided in the application. Where applicable, please note any comments related to Medicaid policy and/or reimbursement practices below.
4. Consistency with Local Plans and Local/Community Needs	Is the action consistent with local plans and/or does it meet community needs? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Provide explanation below. Both NYC programs impacted by the proposed change in ownership are located in the Bronx and Queens, with several neighborhoods in the Bronx (Crotona-Tremont, 105.3; Hunts Point-Mott Haven, 100.1; and Highbridge-Morrisania, 99.5 per 100,000) representing the three highest rates of unintentional drug poisoning (overdose) deaths by neighborhood of residence, New York City, 2022.
5. Provider Standing in the Community	Is there any known information regarding the provider's standing in the community? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Regardless of the answer, provide all known information below or on additional sheets attached to this report. The proposed new owners, Upstate NY Recovery LLC, currently serve as CEO of several Part 816 and Part 818 programs in New York State, namely Urban Recovery, Elev8 Centers of New York, Surfpoint Recovery, and Recovery Center of Niagara.

<p>6.</p> <p>Program Location</p>	<p>In answering this question, the following should be taken into consideration:</p> <ul style="list-style-type: none"> (a) the location is suitable for an Addiction Disorder Treatment Program; (b) the accessibility of public transportation and adequate parking; and (c) any other notable observations. <p>Please describe your assessment of the circumstances noted.</p> <p>This is change in ownership and no change to currently certified program locations.</p>	
	<p>Please check one box.</p> <p><input type="checkbox"/> LGU has visited the proposed location. Date of Visit: _____</p> <p><input type="checkbox"/> LGU has not visited, but has sufficient personal knowledge to attest to its suitability.</p> <p><input checked="" type="checkbox"/> N/A – Please explain, for example, N/A may be appropriate in applications that involve relocation within an existing building. However, factors such as capacity increase, even in an existing building, would not be appropriate for an “N/A” response.</p> <p>This is change in ownership and no change to currently certified program locations.</p>	
<p>7.</p> <p>Current Status of Existing Programs</p>	<p>Are you aware of any community issues with other programs operated by this provider, or in the case of relocation, this program’s current location? (i.e., any issues around loitering, public safety, etc.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please describe any issues.</p> <p>There are no known issues.</p>	
<p>8.</p> <p>Community Response</p>	<p>Please describe your knowledge of the applicant’s outreach to the local community (e.g., Community Service Boards, Community Boards, Planning Boards, Neighborhood Coalitions, other local municipalities). Please summarize your knowledge of community input, including any existing or likely community concerns, as well as any recommendations.</p> <p>The Provider included in their application, letters from Bronx Community Board #7 and Queens Community Board #12 (both dated 7/20/23) acknowledging the change in ownership.</p>	
<p>9.</p> <p>Other Comments</p>	<p>Provide additional comments.</p> <p>N/A</p>	
<p>10.</p> <p>LGU Recommendation</p>	<p><input checked="" type="checkbox"/> Approve <input type="checkbox"/> Disapprove</p>	<p>Signature of Authorized LGU Official</p> <p><i>Michael</i></p> <p>Date</p> <p>4/26/24</p>

NEW YORK STATE OFFICE OF ADDICTION SERVICES AND SUPPORTS
LOCAL GOVERNMENTAL UNIT REVIEW REPORT
(Addiction Disorder Services Certification Actions)

Applicant's Legal Name Arms Acres	Application No.
Local Governmental Unit Putnam County	
<p>In conjunction with the certification action(s) submitted by the above applicant, you are requested to review and provide comments on the proposed actions relative to the provision of addiction disorder services in your jurisdiction. Your comments are important in evaluating the merits of the action(s). In completing the responses, use additional sheets as necessary. Your cooperation in providing complete and thorough responses is appreciated as incomplete replies will delay the processing of this application.</p>	
1 Consistency of Program Description and Site Location with Local/OASAS Requirements	<p>In the case of new providers and/or new services, is the program description and site location consistent with local/OASAS requirements: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below.</p> <p>Based on the program description provided, the provider's services are consistent with OASAS requirements for each of their three operating licenses within Putnam County. This application states no changes will be made to the current services provided by Arms Acres inpatient, outpatient or OTP services.</p>
2 Provider Operational Performance	<p>Is the operational performance of this provider satisfactory? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Regardless of the answer, provide a description of the operational performance of the provider below.</p> <p>Based on the performance data provided, the provider's performance can be deemed "satisfactory", however, the LGU has concerns for the high non-routine discharges, particularly the AMAs and the frequent calls for police intervention. The provider has expressed needs for support on both of these issue and has agreed to work in collaboration with the LGU to make improvements to these operational metrics.</p>
3 Adequacy of Financial Plans	<p>Is the financial plan in the proposal adequate and acceptable? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Provide explanation below.</p> <p>No financial plan was submitted to the LGU and there are no current contracts between Putnam County DSS and Arms Acres.</p> <p>Where applicable, please note any comments related to Medicaid policy and/or reimbursement practices below.</p>
4 Consistency with Local Plans and Local/Community Needs	<p>Is the action consistent with local plans and/or does it meet community needs? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Provide explanation below.</p> <p>Arms Acres has historically met with LGU and local agencies including Carmel Police Department for transparent communication. Due to staffing changes, these meetings have not been taking pace since Decemebr 2023. Arms Acres has committed to reinstating this meetings ASAP. In additional, Arms historically health Town Hall events with local residents to answer questions and address concerns. Arms has assured the LGU that those Town Halls will also resume on an annually or semi-annually.</p>
5 Provider Standing in the Community	<p>Is there any known information regarding the provider's standing in the community? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Regardless of the answer, provide all known information below or on additional sheets attached to this report.</p> <p>Arms Acres has a satisfactory standing in the community.</p>

<p>6.</p> <p>Program Location</p>	<p>In answering this question, the following should be taken into consideration:</p> <ul style="list-style-type: none"> (a) the location is suitable for an Addiction Disorder Treatment Program; (b) the accessibility of public transportation and adequate parking; and (c) any other notable observations. <p>Please describe your assessment of the circumstances noted.</p> <p>The location of Arms Acres is on 54-acres of land allowing distance from other neighboring residents and commercial businesses. There is adequate parking, however, there is no access to public transportation. As such, Arms offers transportation in their private vehicles as a part of the services provided to clients.</p>	
	<p>Please check one box.</p> <p><input checked="" type="checkbox"/> LGU has visited the proposed location. Date of Visit: <u>04/17/2024</u></p> <p><input type="checkbox"/> LGU has not visited, but has sufficient personal knowledge to attest to its suitability.</p> <p><input type="checkbox"/> N/A – Please explain, for example, N/A may be appropriate in applications that involve relocation within an existing building. However, factors such as capacity increase, even in an existing building, would not be appropriate for an "N/A" response.</p>	
<p>7.</p> <p>Current Status of Existing Programs</p>	<p>Are you aware of any community issues with other programs operated by this provider, or in the case of relocation, this program's current location? (i.e., any issues around loitering, public safety, etc.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please describe any issues.</p> <p>Although Carmel Police and the Putnam County Sheriff's Office respond to several calls per month at Arms Acres, there have not been many calls which concern the general public's safety.</p>	
<p>8.</p> <p>Community Response</p>	<p>Please describe your knowledge of the applicant's outreach to the local community (e.g., Community Service Boards, Community Boards, Planning Boards, Neighborhood Coalitions, other local municipalities). Please summarize your knowledge of community input, including any existing or likely community concerns, as well as any recommendations.</p> <p>Due to recent staffing changes, Arms Acres has not been present at community groups. Arms Acres has assured the LGU that they will have staff present at community groups going forward.</p>	
<p>9.</p> <p>Other Comments</p>	<p>Provide additional comments.</p> <p>The LGU supports this application for change of ownership. The LGU has expressed concerns for three specific issues; 1. High number of non-routine discharges 2. Frequent need for Carmel Police Department intervention 3. Staffing shortages. LGU is aware that staffing shortages are a common concern amongst all behavioral health providers at this time. Arms reports the following staff vacancies: Inpatient Budgeted FTEs- 275 vacancies 28.30, OP Budget FTEs- 44.35 vacancies 10.9. The LGU has concerns over the effects of these staffing shortages on the programming offered at Arms Acres as the current program list is not consistent with the programs listed in the application. The LGU is committed to working with Arms Acres to make improvements on stated concerns.</p>	
<p>10.</p> <p>LGU Recommendation</p>	<p><input checked="" type="checkbox"/> Approve <input type="checkbox"/> Disapprove</p>	<p>Signature of Authorized LGU Official <i>[Signature]</i></p> <p>Date 4/23/24</p>

**New York State Office of Addiction Services and Supports
Bureau of Certification (OASAS)**

MEMORANDUM

TO: Dena Holmes
Director, Bureau of Certification

FROM: Jeffrey Capitummino

DATE: April 22, 2024/June 11, 2024

SUBJECT: Application Review
Applicant: Conifer Park Inc.
Application #2023.049 / NYSECON # 234061
Purpose: Change in Ownership
Counties: Clinton, Monroe, Onondaga, Rensselaer, Schenectady, Warren

Project Summary:

Conifer Park Inc. submitted a Certification Application requesting the New York State Office of Addiction Services and Supports' (OASAS) approval for a Change in Ownership affecting twelve Operating Certificates where services are provided across six counties.

The new proposed ownership will consist of nine individuals: Robert Meisner (25%), Michael Meisner (25%), Eliyahu Zev Kohn (25%), Joel Basch (10%), Yosef Rabinowitz (5%), Steven Berger (2.5%), Issac Greenfeld (2.5%), David Levitan (2.5%), and Daniel Turkel (2.5%).

According to the applicant, the current ownership structure, an Employee Stock Ownership Plan (ESOP) Trust, will sell all its shares to Upstate Recovery, LLC. Under the terms of the Stock Purchase Agreement, the ESOP Trust will sell its stock in Liberty to Upstate Recovery NY, LLC. Upstate Recovery LLC is owned by the same individuals seeking to acquire Conifer Park, Inc. Following the transaction's closing, the ESOP plan will terminate, and the ESOP Trust will receive the sale proceeds and continue until all the sale proceeds are distributed to its current members. After the conditions outlined in the Stock Purchase Agreement are completed, Upstate Recovery, LLC will transfer its ownership interests in Conifer Park, Inc. to the nine individuals listed above. These nine individuals will become the direct and sole owners of Arms Acres, Inc. The Stock Purchase Agreement refers to an administrative services agreement being entered into with GHR Group, LLC, and Conifer Park, Inc.

Need:

Program services are already in existence and according to the OASAS Client Data System, Conifer Park, Inc., has admitted 4,288 clients for SUD therapy throughout their care system since January 1, 2023, demonstrating the continued need for the services.

A request for final recommendation from the Clinton County Department of Health and Mental Hygiene was sent by the OASAS Bureau of Certification on April 10, 2024, but has not yet been received.

A request for final recommendation from the Monroe County Department of Health and Mental Hygiene was sent by the OASAS Bureau of Certification on April 10, 2024, but has not yet been received.

A request for final recommendation from the Onondaga County Department of Health and Mental Hygiene was sent by the OASAS Bureau of Certification on April 10, 2024, but has not yet been received.

A request for final recommendation from the Rensselaer County Department of Health and Mental Hygiene was sent by the OASAS Bureau of Certification on April 10, 2024, but has not yet been received.

A request for final recommendation from the Schenectady County Department of Health and Mental Hygiene was sent by the OASAS Bureau of Certification on April 10, 2024, but has not yet been received.

A request for final recommendation from the Warren County Department of Health and Mental Hygiene was sent by the OASAS Bureau of Certification on April 10, 2024, but has not yet been received.

OASAS' Central Regional Office's recommendation in support of this application was received on April 12, 2024.

OASAS' Hudson Regional Office's recommendation in support of this application was received on April 12, 2024, and noted "Provider's inpatient service is being monitored following the two patient deaths. A corrective action plan was submitted and approved on 3/28/24".

OASAS' Western Regional Office's recommendation in support of this application was received on April 12, 2024.

Character and Competence:

Conifer Park, Inc., established as a domestic business corporation in 1983, has been an OASAS-certified provider since 1995. They currently provide (12) OASAS-certified substance use disorder (SUD) services at twelve locations in New York State. Also, Joint Commission accredited Conifer provides SUD treatment with co-occurring medical and mental health services in their outpatient, opioid, inpatient (171 beds), and medically supervised withdrawal treatment services throughout the following counties: Clinton, Monroe, Onondaga, Rensselaer, Schenectady, and Warren. Conifer Park, Inc. holds twelve OASAS operating certificates.

1. Operating Certificate #10018, Inpatient Rehabilitation Services (171 beds), Glenville, NY.
2. Operating Certificate #11437, Medically Supervised Withdrawal and Stabilization Services, Glenville, NY. (co-located services)

OASAS issued Conifer Park to cease admissions for this service on March 3, 2024, following two patient deaths that occurred within 10 days of each other. A corrective action plan was submitted to OASAS on March 13, 2024. OASAS acknowledged progress related to the corrective action and authorized limited admissions and is closely monitoring the programs.

3. Operating Certificate # 12065, Opioid Treatment Program, Troy, NY. In good standing with OASAS
4. Operating Certificate #12135, Opioid Treatment Program, Schenectady, NY. In good standing with OASAS.
5. Operating Certificate #10732, Opioid Treatment Program, Plattsburgh, NY. In good standing with OASAS.
6. Operating Certificate #11944, Opioid Treatment Program, Liverpool, NY. In good standing with OASAS.
7. Operating Certificate # 10738, Outpatient Services, Troy, NY. In good standing with OASAS.
8. Operating Certificate # 10731, Outpatient Services, Rochester, NY. In good standing with OASAS.
9. Operating Certificate # 10730, Outpatient Services, Schenectady, NY. In good standing with OASAS.
10. Operating Certificate # 10729, Outpatient Services, Glens Falls, NY. In good standing with OASAS.
11. Operating Certificate # 10732, Outpatient Services, Plattsburgh, NY. In good standing with OASAS.
12. Operating Certificate # 10733, Outpatient Services, Liverpool, NY. In good standing with OASAS.

The prospective individual owners have ownership interest in several OASAS-certified entities:

Yosef Rabinowitz :

Elev8 Center of New York, LLC (3.75%)

Two Operating Certificates in good standing:

New York County

OC# 251112151

Level of care: Part 818 Inpatient Rehabilitation Services

Niagara County

OC# 250312153

Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Services

Recovery Center of Niagara, LLC (40%)

Two Operating Certificates in good standing:

Niagara County

OC# 260712351

Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Services

Niagara County
OC# 260712350
Level of care: Part 818 Inpatient Rehabilitation Services

Steven Berger:

Elev8 Center of New York, LLC (3.75%)
Two Operating Certificates in good standing:
New York County
OC# 251112151
Level of care: Part 818 Inpatient Rehabilitation Services

Niagara County
OC# 250312153
Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Services

Urban Recovery House LLC (4.17%)
Two Operating Certificates in good standing:
Kings County
OC# 251112175
Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Service

Kings County
OC# 251212163
Level of care: Part 818 Inpatient Rehabilitation Services

Issac Greenfeld:

Urban Recovery House LLC (15%)
Two Operating Certificates in good standing:
Kings County
OC# 251112175
Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Service

Kings County
OC# 251212163
Level of care: Part 818 Inpatient Rehabilitation Services

David Levitan:

Elev8 Center of New York, LLC (3.75%)
Two Operating Certificates in good standing:
New York County
OC# 251112151
Level of care: Part 818 Inpatient Rehabilitation Services

Niagara County
OC# 250312153

Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Services

Urban Recovery House LLC (4.17%)

Two Operating Certificates in good standing:

Kings County
OC# 251112175

Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Service

Kings County
OC# 251212163

Level of care: Part 818 Inpatient Rehabilitation Services

Daniel Turkel:

Elev8 Center of New York, LLC (3.75%)

Two Operating Certificates in good standing:

New York County
OC# 251112151

Level of care: Part 818 Inpatient Rehabilitation Services

Niagara County
OC# 250312153

Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Services

Urban Recovery House LLC (4.17%)

Two Operating Certificates in good standing:

Kings County
OC# 251112175

Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Service

Kings County
OC# 251212163

Level of care: Part 818 Inpatient Rehabilitation Services

Joel Basch:

Surfpoint Recovery, LLC (40%)

Two Operating Certificates in good standing:

Kings County
OC#260912330

Level of care: Part 818 Inpatient Rehabilitation Services

Kings County
OC#260912331

Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Services

Recovery Center of Niagara, LLC (40%)

Two Operating Certificates in good standing:

Niagara County

OC# 260712351

Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Services

Niagara County

OC# 260712350

Level of care: Part 818 Inpatient Rehabilitation Services

Urban Recovery House LLC (16.66%)

Two Operating Certificates in good standing:

Kings County

OC# 251112175

Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Service

Kings County

OC# 251212163

Level of care: Part 818 Inpatient Rehabilitation Services

Elev8 Center of New York, LLC (15%)

Two Operating Certificates in good standing:

New York County

OC# 251112151

Level of care: Part 818 Inpatient Rehabilitation Services

Niagara County

OC# 250312153

Level of care: Part 816.7 Medically Supervised Inpatient Withdrawal & Stabilization Services

Joel Basch is also the Chief Operating Officer of Elev8 Center of New York and meets the OASAS required experience in substance use disorder services.

Overall Financial Condition of the Provider:

OASAS' Fiscal Audit and Review Unit completed a fiscal viability review on February 21, 2024, and determined that Conifer Park, Inc. is fiscally viable.

Adequacy:

Conifer will maintain all their respective assets, as will Liberty Management of Metropolitan New York, Inc. (owner of the Arms Acres real estate and facility) and Liberty Management of the Capital District, Inc. (owner of the Conifer Park real estate and facility).

Compliance:

According to the applicant, there will be no immediate changes to any of the service site locations, services provided, or operating budgets. Staffing patterns will remain unchanged.

Continuity of Care:

Conifer Park, Inc. is a private community provider of SUD services with inpatient and outpatient services to assist those whose lives are impacted by the disease of addiction. Program services include detoxification, Medication-Assisted Therapy, Psychiatric Services, Medical management, intake and referral services, Recovery Coaching, Fitness/Recreation, and aftercare planning. Services are provided to diverse populations using the latest innovations in evidence-based practices in a caring and respectful environment.

Recommendation:

OASAS's recommendation is to approve the request from Conifer Park, Inc. for a Change in Ownership with the following contingencies:

- Copy of all current lease(s) for all certified locations between Liberty Management of the Capital District, Inc. and Conifer Park, Inc. signed by new owners, including the required OASAS right-to-reentry language.
 - A lease was submitted for two of seven properties signed by the new owners and included the required OASAS right to re-entry language.
- Submission of a copy of current and updated company by-laws.
- Submission of a copy of the fully executed Stock Purchase Agreement.
- Submission of documentation to demonstrate the transfer of ownership from Upstate Recovery, LLC, to the 9 individuals listed on the application.
- Final recommendation from the Local Government Unit (LGU) of the Clinton County Department of Health and Mental Hygiene.
 - The final Recommendation from the Clinton County LGU was received on May 16, 2024. The LGU recommended approval.
- Final recommendation from the Local Government Unit (LGU) of the Monroe County Department of Health and Mental Hygiene.
 - The final Recommendation from the Monroe County LGU was received on May 7, 2024. The LGU recommended approval and commented that "MCOMH (Monroe County Office of Mental Health) contacted the regional OASAS representative regarding Conifer's ownership change and they reported they were not aware."
- Final recommendation from the Local Government Unit (LGU) of the Onondaga County Department of Health and Mental Hygiene.
 - The final Recommendation from the Onondaga County LGU was received on May 6, 2024. The LGU recommended approval.

- Final recommendation from the Local Government Unit (LGU) of the Rensselaer County Department of Health and Mental Hygiene.
 - The final Recommendation from the Rensselaer County LGU was received on April 29, 2024. The LGU recommended approval and commented that “The LGU has no experience with the new owner of Conifer Park, and therefore is neutral regarding the change in ownership. The LGU is pleased to have the outpatient program remain in the county. The LGU thus supports the plan.”
- Final recommendation from the Local Government Unit (LGU) of the Schenectady County Department of Health and Mental Hygiene.
 - The final Recommendation from the Schenectady County LGU was received on May 1, 2024. The LGU recommended approval.
- Final recommendation from the Local Government Unit (LGU) of the Warren County Department of Health and Mental Hygiene.
 - The final Recommendation from the Warren County LGU was received on April 30, 2024. The LGU recommended approval.
- Completion of required background check for prospective owner Joel Basch.
 - The required background check for prospective owner Joel Basch was completed on May 6, 2024.
- OASAS review of the administrative services agreement between GHR, LLC and Conifer Park, Inc.
 - The applicant submitted a copy of a proposed administrative services agreement between Conifer Park, Inc. and GHR, LLC, which remains under OASAS review to ensure that any proposed services within the administrative contract do not require certification.

Attachments: LGU Recommendations. maps

NEW YORK STATE OFFICE OF ADDICTION SERVICES AND SUPPORTS
LOCAL GOVERNMENTAL UNIT REVIEW REPORT
(Addiction Disorder Services Certification Actions)

Applicant's Legal Name Conifer Park, Inc.	Application No. # 234061
Local Governmental Unit Rensselaer County	
In conjunction with the certification action(s) submitted by the above applicant, you are requested to review and provide comments on the proposed actions relative to the provision of addiction disorder services in your jurisdiction. Your comments are important in evaluating the merits of the action(s). In completing the responses, use additional sheets as necessary. Your cooperation in providing complete and thorough responses is appreciated as incomplete replies will delay the processing of this application.	
1. Consistency of Program Description and Site Location with Local/OASAS Requirements	In the case of new providers and/or new services, is the program description and site location consistent with local/OASAS requirements: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below. There is no change to the site.
2. Provider Operational Performance	Is the operational performance of this provider satisfactory? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Regardless of the answer, provide a description of the operational performance of the provider below. The LGU has no experience with the new owners of Conifer Park, as a provider.
3. Adequacy of Financial Plans	Is the financial plan in the proposal adequate and acceptable? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Provide explanation below. The LGU has no knowledge of the fiscal arrangements for the new ownership. Where applicable, please note any comments related to Medicaid policy and/or reimbursement practices below.
4. Consistency with Local Plans and Local/Community Needs	Is the action consistent with local plans and/or does it meet community needs? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Provide explanation below. The Local Services Plan has noted the shortage of outpatient treatment capacity, and prefers the program to remain in the county.
5. Provider Standing in the Community	Is there any known information regarding the provider's standing in the community? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Applicable Regardless of the answer, provide all known information below or on additional sheets attached to this report. The LGU is not familiar with the new owner's performance.

<p>6.</p> <p>Program Location</p>	<p>In answering this question, the following should be taken into consideration:</p> <ul style="list-style-type: none"> (a) the location is suitable for an Addiction Disorder Treatment Program; (b) the accessibility of public transportation and adequate parking; and (c) any other notable observations. <p>Please describe your assessment of the circumstances noted.</p> <p>There is no location change proposed.</p>	
<p>7.</p> <p>Current Status of Existing Programs</p>	<p>Please check one box.</p> <p><input type="checkbox"/> LGU has visited the proposed location. Date of Visit: _____</p> <p><input type="checkbox"/> LGU has not visited, but has sufficient personal knowledge to attest to its suitability.</p> <p><input checked="" type="checkbox"/> N/A – Please explain, for example, N/A may be appropriate in applications that involve relocation within an existing building. However, factors such as capacity increase, even in an existing building, would not be appropriate for an “N/A” response.</p>	
<p>8.</p> <p>Community Response</p>	<p>Are you aware of any community issues with other programs operated by this provider, or in the case of relocation, this program’s current location? (i.e., any issues around loitering, public safety, etc.) <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please describe any issues.</p> <p>n/a</p>	
<p>9.</p> <p>Other Comments</p>	<p>Please describe your knowledge of the applicant’s outreach to the local community (e.g., Community Service Boards, Community Boards, Planning Boards, Neighborhood Coalitions, other local municipalities). Please summarize your knowledge of community input, including any existing or likely community concerns, as well as any recommendations.</p> <p>The LGU has been a participant in a meeting with Conifer Park re: the change in ownership.</p>	
<p>10.</p> <p>LGU Recommendation</p>	<p>Provide additional comments.</p> <p>The LGU has no experience with the new owner of Conifer Park, and therefore is neutral regarding the change in ownership. The LGU is pleased to have the outpatient program remain in the county. Te LGU thus supports the plan.</p> <p><input checked="" type="checkbox"/> Approve <input type="checkbox"/> Disapprove</p>	<p>Signature of Authorized LGU Official</p> <p><i>Katherine J. George-Pom...</i></p> <p>LSWR</p> <p>Date</p> <p>4/29/24</p>

NEW YORK STATE OFFICE OF ADDICTION SERVICES AND SUPPORTS
LOCAL GOVERNMENTAL UNIT REVIEW REPORT
 (Addiction Disorder Services Certification Actions)

Applicant's Legal Name Conifer Park, Inc.	Application No. # 234061
Local Governmental Unit Monroe County	
In conjunction with the certification action(s) submitted by the above applicant, you are requested to review and provide comments on the proposed actions relative to the provision of addiction disorder services in your jurisdiction. Your comments are important in evaluating the merits of the action(s). In completing the responses, use additional sheets as necessary. Your cooperation in providing complete and thorough responses is appreciated as incomplete replies will delay the processing of this application.	
1. Consistency of Program Description and Site Location with Local/OASAS Requirements	<p>In the case of new providers and/or new services, is the program description and site location consistent with local/OASAS requirements: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Provide explanation below.</p> <p>This is not a new provider and/or new service(s), the only change is in ownership.</p>
2. Provider Operational Performance	<p>Is the operational performance of this provider satisfactory? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Regardless of the answer, provide a description of the operational performance of the provider below.</p> <p>The last program review was completed by OASAS in February 2022. Conifer received a 3 year certificate, which suggests no immediate concerns.</p>
3. Adequacy of Financial Plans	<p>Is the financial plan in the proposal adequate and acceptable? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below.</p> <p>On the proposal provided the budget information was noted as N/A/left blank.</p> <p>Where applicable, please note any comments related to Medicaid policy and/or reimbursement practices below.</p>
4. Consistency with Local Plans and Local/Community Needs	<p>Is the action consistent with local plans and/or does it meet community needs? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Provide explanation below.</p> <p>Conifer is currently meeting community needs through their existing Part 822 Outpatient Services. Per the proposal there will be no changes to this program.</p>
5. Provider Standing in the Community	<p>Is there any known information regarding the provider's standing in the community? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Regardless of the answer, provide all known information below or on additional sheets attached to this report.</p> <p>Many other OASAS providers are aware of Conifer services, clients in residential settings attend Conifer's Outpatient Clinic.</p>

<p>6.</p> <p>Program Location</p>	<p>In answering this question, the following should be taken into consideration:</p> <ul style="list-style-type: none"> (a) the location is suitable for an Addiction Disorder Treatment Program; (b) the accessibility of public transportation and adequate parking; and (c) any other notable observations. <p>Please describe your assessment of the circumstances noted.</p> <p>This is an existing Outpatient Clinic that appears to be at a suitable location for the services provided, accessible by public transportation and sufficient parking for staff and clients. It is located just off interstate I-490 that serves the city of Rochester, New York.</p>	
	<p>Please check one box.</p> <p><input type="checkbox"/> LGU has visited the proposed location. Date of Visit: _____</p> <p><input type="checkbox"/> LGU has not visited, but has sufficient personal knowledge to attest to its suitability.</p> <p><input checked="" type="checkbox"/> N/A – Please explain, for example, N/A may be appropriate in applications that involve relocation within an existing building. However, factors such as capacity increase, even in an existing building, would not be appropriate for an “N/A” response.</p> <p>This is an existing location with no changes.</p>	
<p>7.</p> <p>Current Status of Existing Programs</p>	<p>Are you aware of any community issues with other programs operated by this provider, or in the case of relocation, this program’s current location? (i.e., any issues around loitering, public safety, etc.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please describe any issues.</p> <p>The Monroe County Office of Mental Health (MCOMH) is not aware of any community issues with the programs operated by this provider. In Monroe County they only operate an Outpatient Clinic.</p>	
<p>8.</p> <p>Community Response</p>	<p>Please describe your knowledge of the applicant’s outreach to the local community (e.g., Community Service Boards, Community Boards, Planning Boards, Neighborhood Coalitions, other local municipalities). Please summarize your knowledge of community input, including any existing or likely community concerns, as well as any recommendations.</p> <p>In the past Conifer’s leadership team has been engaged with various community meetings, however we are not aware of their outreach to the local community over the past couple of years.</p>	
<p>9.</p> <p>Other Comments</p>	<p>Provide additional comments.</p> <p>MCOMH contacted the regional OASAS representative regarding Conifer’s ownership change and they reported they were not aware.</p>	
<p>10.</p> <p>LGU Recommendation</p>	<p><input checked="" type="checkbox"/> Approve <input type="checkbox"/> Disapprove</p>	<p>Signature of Authorized LGU Official</p> <p style="text-align: center;"><i>April Aycock</i></p> <p>Date</p> <p style="text-align: right;">4/29/2024</p>

NEW YORK STATE OFFICE OF ADDICTION SERVICES AND SUPPORTS
LOCAL GOVERNMENTAL UNIT REVIEW REPORT
 (Addiction Disorder Services Certification Actions)

Applicant's Legal Name Conifer Park, Inc.	Application No. #234061
Local Governmental Unit Clinton County	
<p>In conjunction with the certification action(s) submitted by the above applicant, you are requested to review and provide comments on the proposed actions relative to the provision of addiction disorder services in your jurisdiction. Your comments are important in evaluating the merits of the action(s). In completing the responses, use additional sheets as necessary. Your cooperation in providing complete and thorough responses is appreciated as incomplete replies will delay the processing of this application.</p>	
1. Consistency of Program Description and Site Location with Local/OASAS Requirements	<p>In the case of new providers and/or new services, is the program description and site location consistent with local/OASAS requirements: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below.</p> <p>It is my understanding that nothing will change with current programming, services and location.</p>
2. Provider Operational Performance	<p>Is the operational performance of this provider satisfactory? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Regardless of the answer, provide a description of the operational performance of the provider below. Conifer Park has had consistent above satisfactory performance.</p>
3. Adequacy of Financial Plans	<p>Is the financial plan in the proposal adequate and acceptable? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below.</p> <p>Where applicable, please note any comments related to Medicaid policy and/or reimbursement practices below.</p>
4. Consistency with Local Plans and Local/Community Needs	<p>Is the action consistent with local plans and/or does it meet community needs? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Provide explanation below. The services that Conifer Park provides will remain unchanged and consistent with the Local Services Plan.</p>
5. Provider Standing in the Community	<p>Is there any known information regarding the provider's standing in the community? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Regardless of the answer, provide all known information below or on additional sheets attached to this report. Conifer Park has consistent representation at the Community Services Board and Subcommittees. Conifer Park engages in partnerships and community initiatives to serve the population in support of the Local Services Plan.</p>


<p>6.</p> <p>Program Location</p>	<p>In answering this question, the following should be taken into consideration:</p> <ul style="list-style-type: none"> (a) the location is suitable for an Addiction Disorder Treatment Program; (b) the accessibility of public transportation and adequate parking; and (c) any other notable observations. <p>Please describe your assessment of the circumstances noted. There are no changes to the location and accessibility.</p>		
	<p>Please check one box.</p> <p><input type="checkbox"/> LGU has visited the proposed location. Date of Visit: _____</p> <p><input checked="" type="checkbox"/> LGU has not visited, but has sufficient personal knowledge to attest to its suitability.</p> <p><input type="checkbox"/> N/A – Please explain, for example, N/A may be appropriate in applications that involve relocation within an existing building. However, factors such as capacity increase, even in an existing building, would not be appropriate for an “N/A” response.</p> <p>The LGU has not visited in recent years however, has sufficient knowledge of the location to state that it is suitable.</p>		
<p>7.</p> <p>Current Status of Existing Programs</p>	<p>Are you aware of any community issues with other programs operated by this provider, or in the case of relocation, this program’s current location? (i.e., any issues around loitering, public safety, etc.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please describe any issues.</p>		
<p>8.</p> <p>Community Response</p>	<p>Please describe your knowledge of the applicant’s outreach to the local community (e.g., Community Service Boards, Community Boards, Planning Boards, Neighborhood Coalitions, other local municipalities). Please summarize your knowledge of community input, including any existing or likely community concerns, as well as any recommendations. Conifer Park had a region wide meeting explaining in detail their plans to change ownership and it has been reported to the Community Services Board. There are no additional recommendations or concerns.</p>		
<p>9.</p> <p>Other Comments</p>	<p>Provide additional comments.</p>		
<p>10.</p> <p>LGU Recommendation</p>	<p><input checked="" type="checkbox"/> Approve <input type="checkbox"/> Disapprove</p>	<p>Signature of Authorized LGU Official</p> <p><i>Ruchelle Gregory</i></p>	<p>Date</p> <p>4/20/24</p>



LOCAL GOVERNMENTAL UNIT REVIEW REPORT

(Chemical Dependence Services Certification Actions)

Applicant's Legal Name Conifer Park, Inc.	Application No./Action 234061
Local Governmental Unit Onondaga County	
<p>In conjunction with the certification action(s) submitted by the above applicant, you are requested to review and provide comments on the proposed actions relative to the provision of chemical dependence (alcoholism and/or substance abuse) services in your jurisdiction. Your comments are important in evaluating the merits of the action(s). By regulation the Local Governmental Unit shall have a reasonable time from its receipt of the application to review and provide its recommendation to the Office. If possible, please do so within 14 days. When completed, please forward this review report to the appropriate OASAS Regional Office and the Certification Bureau. The Regional Office will take your comments and recommendations into account when performing their concurrent review of the proposed action(s). If you require additional time to complete your review, you should contact the Certification Bureau to request an extension. In completing the responses, use additional sheets as necessary. Your cooperation in providing complete and thorough responses is appreciated as incomplete replies will delay the processing of this application.</p>	
<p>1. Consistency of Program Description and Site Location with Local/OASAS Requirements</p>	<p>In the case of new providers and/or new services, is the program description and site location consistent with local/OASAS requirements: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below.</p>
<p>2. Provider Operational Performance</p>	<p>Is the operational performance of this provider satisfactory? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Regardless of the answer, provide a description of the operational performance of the provider below. There are no known issues with operational performance.</p>
<p>3. Adequacy of Financial Plans</p>	<p>Is the financial plan in the proposal adequate and acceptable? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below. Where applicable, please note any comments related to Medicaid policy and/or reimbursement practices below.</p>
<p>4. Consistency with Local Plans and Local/Community Needs</p>	<p>Is the action consistent with local plans and/or does it meet community needs? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Provide explanation below. Approval will allow continued services within Onondaga County and is consistent with local services plan.</p>
<p>5. Provider Standing in the Community</p>	<p>Is there any known information regarding the provider's standing in the community? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Regardless of the answer, provide all known information below or on additional sheets attached to this report. Conifer Park has maintained a positive reputation in the local community.</p>

<p>6. Program Location</p>	<p>In answering this question, the following should be taken in to consideration:</p> <ul style="list-style-type: none"> (a) the location is suitable for a Chemical Dependency Treatment Program; (b) the accessibility of public transportation and adequate parking; (c) any other notable observations. <p>Please describe your assessment of the circumstances noted.</p> <p>There are no known changes to the services area within Onondaga County.</p> <p>Please check one box.</p> <p><input type="checkbox"/> LGU has visited the proposed location. Date of Visit: _____</p> <p><input checked="" type="checkbox"/> LGU has not visited, but has sufficient personal knowledge to attest to its suitability.</p> <p><input type="checkbox"/> N/A – Please explain, for example, N/A may be appropriate in applications that involve relocation within an existing building. However, factors such as capacity increase, even in an existing building, would not be appropriate for an “N/A” response.</p>		
<p>7. Current Status of Existing Programs</p>	<p>Are you aware of any community issues with other programs operated by this provider, or in the case of relocation, this program’s current location? (i.e., any issues around loitering, public safety, etc.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please describe any issues.</p>		
<p>8. Community Response</p>	<p>Please describe your knowledge of the applicant’s outreach to the local community (e.g., Community Service Boards, Community Boards, Planning Boards, Neighborhood Coalitions, other local municipalities). Please summarize your knowledge of community input, including any existing or likely community concerns, as well as any recommendations.</p> <p>Prior Consult 7/23/2023. There are no known concerns.</p>		
<p>9. Other Comments</p>	<p>Provide additional comments.</p>		
<p>10. LGU Recommendation</p>	<p><input checked="" type="checkbox"/> Approve <input type="checkbox"/> Disapprove</p>	<p>Signature of Authorized LGU Official</p> 	<p>Date</p> <p>May 6, 2024</p>

NEW YORK STATE OFFICE OF ADDICTION SERVICES AND SUPPORTS
LOCAL GOVERNMENTAL UNIT REVIEW REPORT
(Addiction Disorder Services Certification Actions)


Applicant's Legal Name Conifer Park, Inc.	Application No. # 234061
Local Governmental Unit Warren County	
In conjunction with the certification action(s) submitted by the above applicant, you are requested to review and provide comments on the proposed actions relative to the provision of addiction disorder services in your jurisdiction. Your comments are important in evaluating the merits of the action(s). In completing the responses, use additional sheets as necessary. Your cooperation in providing complete and thorough responses is appreciated as incomplete replies will delay the processing of this application.	
1 Consistency of Program Description and Site Location with Local/OASAS Requirements	In the case of new providers and/or new services, is the program description and site location consistent with local/OASAS requirements: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below. There are no known changes in program services or site location in Warren County.
2 Provider Operational Performance	Is the operational performance of this provider satisfactory? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Regardless of the answer, provide a description of the operational performance of the provider below. There are no known issues with operational performance.
3 Adequacy of Financial Plans	Is the financial plan in the proposal adequate and acceptable? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below. Where applicable, please note any comments related to Medicaid policy and/or reimbursement practices below.
4 Consistency with Local Plans and Local Community Needs	Is the action consistent with local plans and/or does it meet community needs? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Provide explanation below. Approval will allow for continued provision of outpatient services in Glens Falls, Warren County. Conifer Park is a participant in the subcommittee structure of the Warren County Community Services Board, and has been part of the LGU Local Services Planning process. I am not aware of anything in the proposal that would be inconsistent with the Warren County Local Services Plan.
5 Provider Standing in the Community	Is there any known information regarding the provider's standing in the community? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Regardless of the answer, provide all known information below or on additional sheets attached to this report. Conifer Park has consistently maintained a positive reputation in the local community and throughout their service area.

<p>6.</p> <p>Program Location</p>	<p>In answering this question, the following should be taken into consideration:</p> <ul style="list-style-type: none"> (a) the location is suitable for an Addiction Disorder Treatment Program; (b) the accessibility of public transportation and adequate parking; and (c) any other notable observations. <p>Please describe your assessment of the circumstances noted.</p> <p>There are no known changes to the Glens Falls outpatient clinic location. The clinic is located on public transportation bus line. It is very accessible in the current location of downtown Glens Falls.</p>	
	<p>Please check one box.</p> <p><input type="checkbox"/> LGU has visited the proposed location. Date of Visit: _____</p> <p><input checked="" type="checkbox"/> LGU has not visited, but has sufficient personal knowledge to attest to its suitability.</p> <p><input type="checkbox"/> N/A – Please explain, for example, N/A may be appropriate in applications that involve relocation within an existing building. However, factors such as capacity increase, even in an existing building, would not be appropriate for an “N/A” response.</p>	
<p>7.</p> <p>Current Status of Existing Programs</p>	<p>Are you aware of any community issues with other programs operated by this provider, or in the case of relocation, this program’s current location? (i.e., any issues around loitering, public safety, etc.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please describe any issues.</p>	
<p>8.</p> <p>Community Response</p>	<p>Please describe your knowledge of the applicant’s outreach to the local community (e.g., Community Service Boards, Community Boards, Planning Boards, Neighborhood Coalitions, other local municipalities). Please summarize your knowledge of community input, including any existing or likely community concerns, as well as any recommendations.</p> <p>Prior consult meeting was held on 7/17/23 that included LGUs within the region. Additional outreach to my office occurred on 4/23/24 and Conifer Park leadership staff attended an in-person meeting with the Director of Community Services on 4/26/24. There are no known concerns.</p>	
<p>9.</p> <p>Other Comments</p>	<p>Provide additional comments.</p>	
<p>10.</p> <p>LGU Recommendation</p>	<p><input checked="" type="checkbox"/> Approve <input type="checkbox"/> Disapprove</p>	<p>Signature of Authorized LGU Official</p> <p><i>[Signature]</i></p> <p>Date</p> <p>4/30/24</p>



LOCAL GOVERNMENTAL UNIT REVIEW REPORT (Chemical Dependence Services Certification Actions)

Form with fields for Applicant's Legal Name (Conifer Park, Inc), Application No./Action (234061), Local Governmental Unit (Schenectady County), and five numbered sections for review questions regarding program consistency, provider performance, financial plans, community needs, and provider standing.

<p>6. Program Location</p>	<p>In answering this question, the following should be taken in to consideration:</p> <p>(a) the location is suitable for a Chemical Dependency Treatment Program; (b) the accessibility of public transportation and adequate parking; (c) any other notable observations.</p> <p>Please describe your assessment of the circumstances noted.</p> <p>Please check one box.</p> <p><input type="checkbox"/> LGU has visited the proposed location. Date of Visit: _____ <input type="checkbox"/> LGU has not visited, but has sufficient personal knowledge to attest to its suitability. <input checked="" type="checkbox"/> N/A – Please explain, for example, N/A may be appropriate in applications that involve relocation within an existing building. However, factors such as capacity increase, even in an existing building, would not be appropriate for an “N/A” response.</p> <p>No change in services or location - It is a change in ownership</p>		
<p>7. Current Status of Existing Programs</p>	<p>Are you aware of any community issues with other programs operated by this provider, or in the case of relocation, this program’s current location? (i.e., any issues around loitering, public safety, etc.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please describe any issues.</p>		
<p>8. Community Response</p>	<p>Please describe your knowledge of the applicant’s outreach to the local community (e.g., Community Service Boards, Community Boards, Planning Boards, Neighborhood Coalitions, other local municipalities). Please summarize your knowledge of community input, including any existing or likely community concerns, as well as any recommendations.</p> <p>There are no current concerns regarding service provision</p>		
<p>9. Other Comments</p>	<p>Provide additional comments.</p>		
<p>10. LGU Recommendation</p>	<p><input checked="" type="checkbox"/> Approve <input type="checkbox"/> Disapprove</p>	<p>Signature of Authorized LGU Official</p> 	<p>Date</p> <p>5/11/2024</p>

Applicant Name: Groups Recover Together New York LLC
d/b/a Groups Recover Together
Application #: CA #2023.035 CON #234046

Page 1

**New York State Office of Addiction Services and Supports
Bureau of Certification (OASAS)**

M E M O R A N D U M

TO: Dena Holmes

FROM: W. Bradford Ellis

DATE: 5/31/24

SUBJECT: Application Review

Applicant: Groups Recover Together - New York LLC d/b/a Groups
Recover Together

Application #: CA #2023.035 / CON #234046

Purpose: New Provider Part 822 Services

County: Ulster

Project Summary:

Groups Recover Together - New York LLC d/b/a Groups Recover Together (Groups) submitted a Certification Application requesting New York State Office of Addiction Services and Supports' (OASAS) approval to become a New OASAS Provider of Part 822 Outpatient Services to be located at 465 Broadway Kingston, New York 12401.

Groups intends to utilize its affiliation with Groups Recover Together Inc. to duplicate their existing treatment modalities at the proposed Kingston location. Groups Recover Together Inc. has been in operation since 2014 and currently operates treatment facilities in 14 states with a planned four state (not including New York) expansion of their treatment centers coming soon.

Groups will follow Groups Recover Together Inc.'s primary focus, which has been on Opioid Use Disorders. Groups Recover Together Inc.'s historical treatment of this disorder has utilized a combination of Medically Assisted Treatment (MAT) and Outpatient Therapy. Groups intends to bring the same formatted care to Kingston NY. Groups plans on being open 5 days a week Monday thru Friday from 9:00 AM to 7:00PM. They will also have staff on call over the weekends along with a 24-hour crisis line.

The applicant indicated that they plan to offer several forms of counseling services which will include individual and group counseling, family and group family counseling, stress management, relapse prevention, peer support and aftercare counseling. The proposed services will have an average session length of 60 minutes. Groups will also offer other on-site service components that include educational, social, and case management services.

Applicant Name: Groups Recover Together New York LLC

d/b/a Groups Recover Together

Application #: CA #2023.035 CON #234046

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The program expects to treat approximately 100 patients annually, with their treatment population being seen an average of twice a week, resulting in two services per week. The applicant plans an average length of stay to be proximally 6 to 9 months.

The proposed facility will be centrally located in Kingston on the main thoroughfare of Broadway which will allow for easier access to treatment via public transportation. The facility also has ample parking with two large lots. The facility is located a few blocks from Kingston Hospital and is situated in a commercially zoned building which also houses SimiTree Behavioral Health.

Need:

Groups intends to help individuals with substance use disorder (SUD), concentrating on those with opioid use disorder (OUD) to take back their lives. The applicant reported that Ulster County has one of the highest opioid use disorder prevalence rates in both the Hudson Valley and the state of New York. According to the Center for Disease Control (CDC), Ulster County is a very high need area, particularly regarding OUD. According to the applicant, the opioid overdose rate in Ulster County is 28.7 per 100,000 people, as compared to the national average of 16.8 per 100,000. Ulster's rate is 150% higher than the national average. In addition, the whole drug overdose death rate in Ulster County is 34.5 per 100,000. Lastly, the applicant reports that the OUD prevalence rate is estimated at 5.1%, which is more than 4 times the national average rate of 1.2%

With an increase of 400% for opioid overdoses since 2014, (Comptroller's Opioid Snapshot report released in December 2022) the applicant states their proposed location in Kingston will provide critical resources required to assist individuals with opioid use disorder and SUD in general. Using data from McKinsey & Company, the applicant indicates that an estimated 5.1% of the Ulster County population has OUD which equates to an estimated 10,000 individuals living with opioid use disorder in Ulster County, 1,300 of which live in Kingston. These numbers reveal that Kingston has the most OUD residence of any city in Ulster County and the only town in Ulster County that has over 300 estimated residents with OUD. There are 1,500 more individuals with opioid use disorder in Ulster County than its larger neighboring county (Orange County), which has more than double the population.

According to the NYS Opioid Dashboard, in 2020, Ulster County's rate of hospital discharges involving an opioid overdose was 16 per 100,000 population, as compared to the statewide rate of 14.3 per 100,000. The applicant stated that they are confident Kingston is the best place to locate within the area due to its high number of residents with OUD and additional residents with SUD/OUD that reside in Ulster County. With opioid overdoses increasing dramatically in the community (368 to 430 from 2021 to 2022, Ulster County Department of Health) Groups program centers around its proposed members overcoming their SUD and sustaining a lasting recovery. Given an opioid overdose death rate of over 25 per 100,000 residents within the community (CDC Wonder Database), the applicant's aim is to bring accessible and comprehensive medication assisted treatment paired with evidence-based clinical services to all individuals with opioid use disorder and other diagnosed substance use disorders.

Applicant Name: Groups Recover Together New York LLC

d/b/a Groups Recover Together

Application #: CA #2023.035 CON #234046

Page 3

The applicant submitted a copy of a letter which they indicate was sent out to community stakeholders such as the State Senator for Ulster County, local politicians, Director of Health and Wellness for Live Well Kingston, the Ulster County Sherriff's Office and multiple religious organizations. The letter provided introduced themselves as an organization and outlined their mission and desire to open a program in Kingston.

The applicant stated that they had not received any return correspondence from their outreach efforts that would show support or concerns with the action in this application.

According to the 2024 Local Service Plan Results, the Ulster County Department of Health and Mental Hygiene's goals and plans include reducing substance use related morbidity and mortality, focusing on the neighborhoods that are experiencing the highest burden of overdose deaths, advanced systems improvement with equitable access to behavior health care for publicly and privately insured individuals. Their annual and intermediate plans for addiction services indicated that raising awareness, reducing harm, expand treatment were all priorities for Ulster County.

The Ulster County Department of Behavioral and Community Health's recommendation in support of this application was received on 5/13/24.

The OASAS Hudson Regional Office's recommendation in support of this application was received on 5/29/24.

Character and Competence:

An affiliate of Groups, Recovery Together, Inc. is incorporated in the state of Delaware and provides approximately 116 substance use disorder treatment services in approximately 14 states operating under the same assumed name Groups Recover Together. In lieu of Recovery Together, Inc. applying for OASAS Certification, Groups Recover Together- New York LLC was established as a Domestic Limited Liability Company on 6/2/2022. Furthermore, the forementioned New York Domestic Limited Liability Company was sold to Dr. Jacob Crothers in July of 2022. The assumed name (d/b/a) Groups Recover Together was added to the LLC on 1/4/23. Presently, the Governing Authority consist of one member/owner, Dr. Jacob Crothers who is also the current Chief Outcomes Officer and National Medical Director of Group Recover Together, Inc.

The applicant provided the Purchase Agreement dated July 15, 2022, between Recovery Together Inc. and Dr. Jacob Crothers. A Certificate of Publication was filed with the state on 8/24/22.

The two companies will remain affiliated through an administrative agreement and Dr. Jacob Crothers' dual roles as Owner of Groups Recover Together - New York d/b/a Groups Recover Together, and on the leadership team (Chief Outcomes Officer and National Medical) of Groups Recover Together Inc.

The applicant submitted an administrative agreement between Groups Recover Together - New York LLC d/b/a Groups Recover Together and Recovery Together Inc. that was reviewed

Applicant Name: Groups Recover Together New York LLC

d/b/a Groups Recover Together

Application #: CA #2023.035 CON #234046

by OASAS Counsel's office. The administrative agreement is for clerical and administrative services only that include accounting, billing, payroll services. The agreement does not allow for any services that are affiliated, associated with, or directly affect clinical services, clinical staff or certified services which would require certification.

Dr. Crothers has demonstrated to have the substance use disorder experience as required by OASAS. He has an extensive work history within the addiction field and currently is part of Groups Recover Together Inc.'s leadership, as Chief Outcome Officer and National Medical Director.

Overall Financial Condition of the Provider:

The proposed annual budget identifies revenues at \$731,799.83. These projected revenues were generated from Client/Patient Fees, Medicaid Managed Care and Private Health Insurance Managed Care. The total projected expenses are \$552,340. They will be generated from Salaries/wages, fringe benefits, professional services, property expenses, non-personal service expenses and management/general overhead. This will leave a total profit of \$179,495.83.

The OASAS Hudson Regional Office did not report concerns after review of the submitted budget.

The applicant submitted the required documentation demonstrating available sufficient funding for the initial six-months, while the program gets underway. Groups Recover Together New York LLC. d/b/a Groups Recover Together has a revolving loan agreement with Recover Together Inc.

Adequacy:

A lease and sublease for this location was submitted and both contain the required OASAS right to re-entry language.

OASAS' Upstate Facilities Evaluation and Inspection Unit performed a floor plan review and State Environmental Quality Review (SEQR) on 8/3/23. They found that the space appears to be adequate for the services to be provided and that there will be no negative impact on the environment relative to the renovation of the building.

Compliance:

The applicant submitted a staffing plan for the proposed Kingston outpatient location which meets regulatory requirements and includes:

.25 FTE Medical Director	(1 part time)
1.0 FTE Clinical Director	(1 part time)
.50 FTE Physician	(1 part time)
.95 FTE Nurse Practitioner/Physician Assistant	(3 part time)

Applicant Name: Groups Recover Together New York LLC
d/b/a Groups Recover Together

Application #: CA #2023.035 CON #234046

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1.0 FTE Full-time CASAC	(1 full time)
1.5 FTE Counselor QHP Other	(1 Full time 1 Part time)
1.0 FTE CRPA	(1 full time)

The proposed site will be open 5 days a week Monday – Friday from 8:00 AM to 7:00 PM. The applicant stated they will have a 24/7 crisis call line and staff on call Saturday, and Sunday Policies and procedures have been reviewed for regulatory compliance and are accepted by OASAS.

Continuity of Care:

The applicant submitted policies and procedures that address continuity of care, including referral agreements with other service providers as well as procedures for medical and psychiatric emergencies. As a new OASAS Provider which is new to New York the applicant hopes to create a network of care to ensure that the best possible continuity of care is achieved. The applicant plans on joining the Ulster County Community Services Board to help integrate their program into the existing network of providers.

Recommendation:

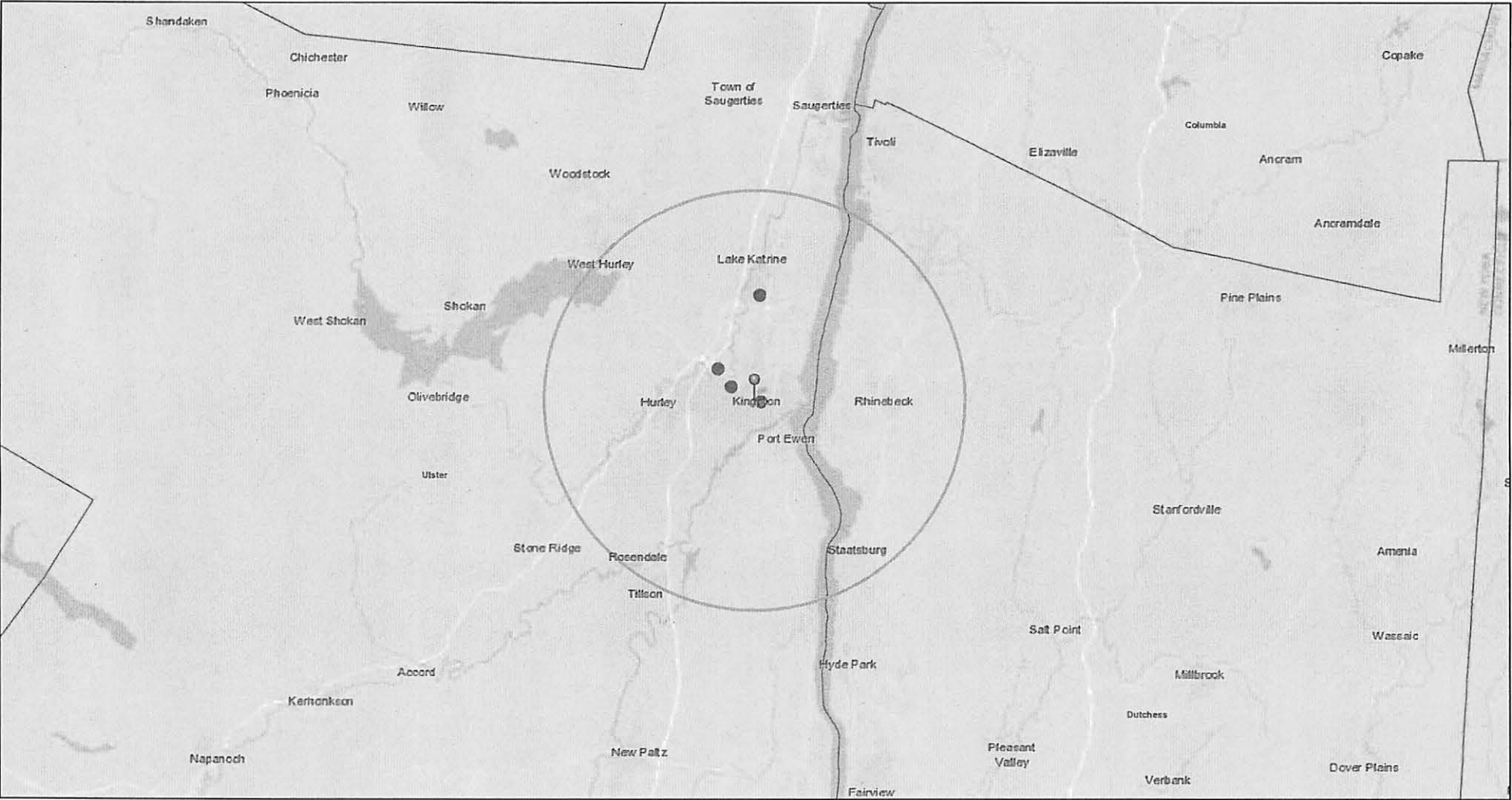
OASAS recommendation is to approve the request from Groups Recover Together New York LLC d/b/a Groups Recover Together to establish a Part 822 Outpatient Services with the following contingencies:

- Verification of the hiring of sufficient staff to meet regulatory requirements.
- OASAS inspection and approval of the facility
- Copy of filing receipt from the NYS Department of State indicating that the amended Certificate of Incorporation/Articles of Organization, including the OASAS required language, have been filed.

Effective Date:

Attachments: Map, PP6-LGU recommendation

CON# 23406 - Groups Recover Together Part 822 OP's within 10 miles

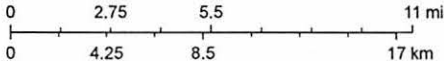


5/22/2024, 3:25:04 PM

Certified SUD Outpatient Treatment Programs (includes additional locations)

- Outpatient Clinic
- County

1:288,895



Esri, HERE, NPS, Esri, HERE, Garmin, USGS, EPA, NPS

NEW YORK STATE OFFICE OF ADDICTION SERVICES AND SUPPORTS
LOCAL GOVERNMENTAL UNIT REVIEW REPORT
(Addiction Disorder Services Certification Actions)

Applicant's Legal Name Groups Recover Together-New York, LLC b/b/a Groups Recover Together	Application No. Ca #2023.035 CON #234046
Local Governmental Unit Ulster	
<p>In conjunction with the certification action(s) submitted by the above applicant, you are requested to review and provide comments on the proposed actions relative to the provision of addiction disorder services in your jurisdiction. Your comments are important in evaluating the merits of the action(s). In completing the responses, use additional sheets as necessary. Your cooperation in providing complete and thorough responses is appreciated as incomplete replies will delay the processing of this application.</p>	
1. Consistency of Program Description and Site Location with Local/OASAS Requirements	<p>In the case of new providers and/or new services, is the program description and site location consistent with local/OASAS requirements: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below.</p> <p>The proposal is consistent with the standards for an 822 clinic and the site location, as described to us by the applicant, is suitable.</p>
2. Provider Operational Performance	<p>Is the operational performance of this provider satisfactory? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Regardless of the answer, provide a description of the operational performance of the provider below.</p> <p>We have no direct knowledge of their current performance at this time. We are unaware of they have begun serving the community as of yet.</p>
3. Adequacy of Financial Plans	<p>Is the financial plan in the proposal adequate and acceptable? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below.</p> <p>No concerns with submitted plan.</p> <p>Where applicable, please note any comments related to Medicaid policy and/or reimbursement practices below.</p>
4. Consistency with Local Plans and Local/Community Needs	<p>Is the action consistent with local plans and/or does it meet community needs? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Provide explanation below.</p> <p>The need for SUD services in our community remains high and although the market in Kingston is more saturated than in other areas, we believe the need is there and providing consumer choice is optimal.</p>
5. Provider Standing in the Community	<p>Is there any known information regarding the provider's standing in the community? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Regardless of the answer, provide all known information below or on additional sheets attached to this report.</p> <p>No.</p>

<p>6.</p> <p>Program Location</p>	<p>In answering this question, the following should be taken into consideration:</p> <ul style="list-style-type: none"> (a) the location is suitable for an Addiction Disorder Treatment Program; (b) the accessibility of public transportation and adequate parking; and (c) any other notable observations. <p>Please describe your assessment of the circumstances noted.</p> <p>The location is good, although near another 822 site it is on Broadway in Kingston and accessible by walking, biking, vehicle and bus.</p>		
	<p>Please check one box.</p> <p><input type="checkbox"/> LGU has visited the proposed location. Date of Visit: _____</p> <p><input checked="" type="checkbox"/> LGU has not visited, but has sufficient personal knowledge to attest to its suitability.</p> <p><input type="checkbox"/> N/A – Please explain, for example, N/A may be appropriate in applications that involve relocation within an existing building. However, factors such as capacity increase, even in an existing building, would not be appropriate for an “N/A” response.</p>		
<p>7.</p> <p>Current Status of Existing Programs</p>	<p>Are you aware of any community issues with other programs operated by this provider, or in the case of relocation, this program’s current location? (i.e., any issues around loitering, public safety, etc.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please describe any issues.</p> <p>No.</p>		
<p>8.</p> <p>Community Response</p>	<p>Please describe your knowledge of the applicant’s outreach to the local community (e.g., Community Service Boards, Community Boards, Planning Boards, Neighborhood Coalitions, other local municipalities). Please summarize your knowledge of community input, including any existing or likely community concerns, as well as any recommendations.</p> <p>None that we are aware of.</p>		
<p>9.</p> <p>Other Comments</p>	<p>Provide additional comments.</p> <p>We look forward to participating in the process.</p>		
<p>10.</p> <p>LGU Recommendation</p>	<p><input checked="" type="checkbox"/> Approve <input type="checkbox"/> Disapprove</p>	<p>Signature of Authorized LGU Official</p> <p><i>Katrina H. Williams</i></p>	<p>Date</p> <p>5/13/24</p>

**New York State Office of Addiction Services and Supports
Bureau of Certification (OASAS)**

M E M O R A N D U M

TO: Dena Holmes

FROM: Bradford Ellis

DATE: 5/31/24

SUBJECT: Application Review

Applicant: Statcare Urgent & Walk-in Medical Care PLLC d/b/a Nao Medical

Application #: CA# 2023.053 / CON #234065

Purpose: New OASAS Provider-Part 822 Outpatient services

County: Nassau

Project Summary:

Statcare Urgent & Walk-in Medical Care PLLC d/b/a Nao Medical submitted a Certification Application requesting New York State Office of Addiction Services and Supports' (OASAS) approval to become a new OASAS provider and establish Part 822 Outpatient Services to be located at 135 Mineola Blvd Mineola NY 11501.

Statcare Urgent & Walk-in Medical Care PLLC d/b/a Nao Medical is proposing to offer outpatient services in conjunction with medical services, mental health, support services and medication assisted treatment (MAT). These services will be provided at the applicant's existing Urgent Care facility where they currently provide low threshold Buprenorphine services. The applicant's vision is to provide a space where the patient can receive medical and MAT care with a full continuum of outpatient treatment services and supports.

The program proposes to provide services six days per week to include weekend and evening hours.

Need:

According to the applicant, substance abuse is a significant public health challenge in Nassau County, and that there is a pressing need for comprehensive substance abuse treatment, integrated primary care, and therapy services. The applicant is currently a provider of MAT services and sees the need and benefit of adding addiction services to their Urgent Care. The applicant proposes to provide these services for all clients, however due their current experience sees the importance of a full line of treatment for those engaging in MAT. The applicant reports that many individuals in Nassau County fail to seek necessary treatment and

this gap in effective treatment services delivered, highlights the urgent need for accessible and effective treatment solutions.

The applicant provided the following statistics in support of the need for the proposed program. In 2021, 16.4% of adults in New York State reported excessive alcohol use, with 14.9% engaging in binge drinking. Excessive drinking rates among women in New York were 14.8% in 2019, above the national average. Male residents engaged in excessive drinking at a rate of 21.9% in 2019. Deaths involving heroin or prescription opioids remained stable in 2018, with 1,243 and 998 deaths, respectively. New York State had one of the lowest rates of opioid prescriptions in the country in 2018. Prescription drug abuse is most prevalent among young adults aged 18-25. The applicant reports several factors that are driving the increase in drug overdose deaths in Long Island, including: The rise of fentanyl, loss of services during the pandemic, increasing mental health issues, isolation, and lack of support systems for individuals with addiction.

According to Nassau County, opioid overdose and crude rates per 100,000 population primary data as of April 2023: Nassau County has the following data for deaths for 2022. All opioid overdoses 181 representing a rate of 13.3., Heroin overdoses 19 representing a rate of 1.4, Synthetic Opioids other than Methadone such as Fentanyl 161 representing 11.9 percent. The data also indicated that the hospitalization around these three categories of overdoses resulted in a higher rate of hospitalization for Nassau County than the average rate for New York State.

The applicant stated that integrated primary care and substance use disorder treatment have shown promising results and that integrated programs lead to improved screening, better communication between providers, enhanced access to services, and improved patient outcomes.

According to the applicant they have reached out to several current providers of services in the area. There has been mixed support for the program proposed in this application. The applicant did receive a letter of support from their U.S Congressman.

The 2023 Goals and Plans form the 2024 local services plans for The Nassau County Office of Mental Health, Chemical Dependence and Developmental Disabilities Services indicated workforce, crisis services, opioid crisis, case management and care coordination as some of the goals needed in the county. The Nassau County Office of Mantal Health, Chemical Dependence and Developmental Disabilities Services 2024 need report stated that case management, care coordination and cross System services were in need within the county.

On 4/29/23, OASAS Bureau of Certification received a complete Local Government Review Recommendation from the New York City Department of Health and Mental Hygiene with a positive recommendation for this action.

The OASAS Bureau of Certification received a completed Regional Office Review Recommendation from OASAS' New York City Regional Office on 6/3/24, noting a positive recommendation for this application.

Character and Competence:

Statcare Urgent & Walk-in Medical Care d/b/a Nao Medical established as a Domestic Limited Liability Corporation in April of 2021. This entity consists of one owner Dr. Priti Jain who holds 100 percent of the shares and voting rights.

Dr. Priti Jain is a licensed Medical Doctor, who is in good standing with New York State Education Department Office of the Professions. Dr Priti Jain has demonstrated to have the substance use disorder experience as required by OASAS. Dr Jain has extensive work experience within the addiction field as a prescriber of low threshold buprenorphine for years.

Currently Statcare Urgent & Walk-in Medical Care d/b/a Nao Medical holds a valid accreditation with The Urgent Care Association and has SAMSHA facility approval.

Overall Financial Condition of the Provider:

The proposed annual budget identifies revenues at \$1,449,000. The revenues were comprised of Client Fees, Medicaid Managed Care, Medicaid Fee for Service, Medicare, Private Health Insurance Managed Care, Private Health Insurance Fee for Service, Federal Grants, State Grants other than OASAS and Local Government Grants. The proposed expenses totaled \$1,368,000, which included Salaries, Fringe Benefits, Professional Services, Equipment, Property Expenses, other Non-Personal Services Expenses and General Overhead. These numbers resulted in a proposed profit of \$81,00 for the first year.

Statcare Urgent & Walk-in Medical Care d/b/a Nao Medical, has submitted documentation of sufficient funds to sustain the initial 6-months of startup.

OASAS' Regional Office has reviewed the budget and there were no concerns.

Adequacy:

The applicant has submitted a lease that was approved and included the necessary OASAS reentry language.

OASAS Facility Evaluation and Inspection Unit (FEIU) completed a State Environmental Quality Review (SEQR) on November 14, 2023, indicating no further environmental review was needed.

OASAS (FEIU) completed a Floor Plan Review on November 20, 2023, and a Physical Plant Inspection on January 20, 2024. Both reviews found that the proposed space appears to comply with the Part 814 facility regulations for service providers.

Compliance:

The applicant submitted a staffing plan which meets regulatory requirements and includes:

Director	1.00 FTE	(One Full Time)
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Medical Director	.25 FTE	(One Part-Time)
Clinical Director	.25 FTE	(One Part -Time)
Medical Staff	1.50 FTE	(One Full Time QHP and One Part time)
Counselor CASAC	1.50 FTE	(One Full-time, One -Part Time)
Certified Peer Recovery Advocate	1.50 FTE	(Two Part-time)
Health Coordinator	1.00 FTE	(One Full Time)

Policies and procedures have been reviewed for regulatory compliance and are accepted by OASAS for the purposes of the application process and establishing the service within the application. It was suggested to the applicant as they begin to provide services that they continue to revise and update their policies and procedures to reflect any nuances that may occur. It was also suggested that the policies and procedures speak primarily to the Part 822 services and that the MAT services should be seen as a secondary service that is attached to the outpatient services.

Continuity of Care:

The applicant has reached out to several types of treatment services within the community in anticipation of creating relationships that will benefit their clients and give the opportunity to create good continuity of care. The applicant's policies and procedures speak to the proposed continuum of care.

Recommendation:

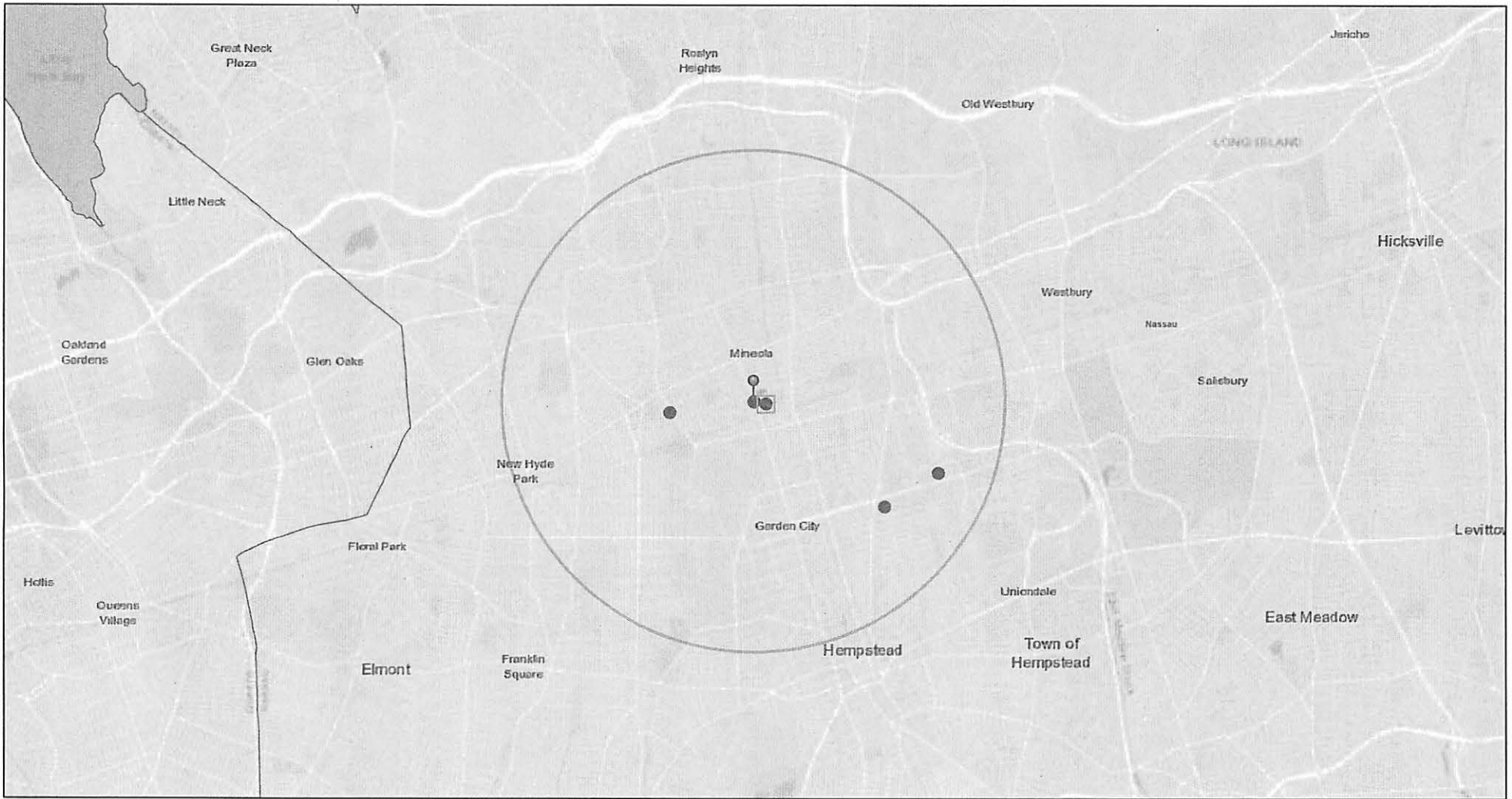
OASAS recommendation is to approve the request from Statcare Urgent & Walk-in Medical Care d/b/a Nao Medical to become a New OASAS Provider of Part 822 Outpatient Services with the following contingencies:

- Verification of the hiring of sufficient staff to meet regulatory requirements
- Copy of filing receipt from the NYS Department of State indicating that the amended Certificate of Incorporation/Articles of Organization, including the OASAS required language, have been filed.

Effective Date: TBD

Attachments: LGU recommendation, maps

Part 822 OP within 3 miles of Statcare/Nao Medical

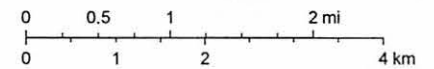


5/28/2024, 3:28:19 PM

Certified SUD Outpatient Treatment Programs (includes additional locations)

- Outpatient Clinic
- County

1:72,224



Esri, HERE, Nassau County, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA

NEW YORK STATE OFFICE OF ADDICTION SERVICES AND SUPPORTS
LOCAL GOVERNMENTAL UNIT REVIEW REPORT
 (Addiction Disorder Services Certification Actions)

Applicant's Legal Name Statcare Urgent & Walk-in Medical Care d/b/a Nao Medical	Application No. CA #2023.053 CON #234065
Local Governmental Unit NASSAU County	
<p>In conjunction with the certification action(s) submitted by the above applicant, you are requested to review and provide comments on the proposed actions relative to the provision of addiction disorder services in your jurisdiction. Your comments are important in evaluating the merits of the action(s). In completing the responses, use additional sheets as necessary. Your cooperation in providing complete and thorough responses is appreciated as incomplete replies will delay the processing of this application.</p>	
1. Consistency of Program Description and Site Location with Local/OASAS Requirements	<p>In the case of new providers and/or new services, is the program description and site location consistent with local/OASAS requirements: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below.</p>
2. Provider Operational Performance	<p>Is the operational performance of this provider satisfactory? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Regardless of the answer, provide a description of the operational performance of the provider below. Unknown</p>
3. Adequacy of Financial Plans	<p>Is the financial plan in the proposal adequate and acceptable? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below. The financial plan proposed on Attachment 1A presents as adequate. Where applicable, please note any comments related to Medicaid policy and/or reimbursement practices below.</p>
4. Consistency with Local Plans and Local/Community Needs	<p>Is the action consistent with local plans and/or does it meet community needs? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Provide explanation below.</p>
5. Provider Standing in the Community	<p>Is there any known information regarding the provider's standing in the community? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Applicable Regardless of the answer, provide all known information below or on additional sheets attached to this report.</p>

<p>6.</p> <p>Program Location</p>	<p>In answering this question, the following should be taken into consideration:</p> <ul style="list-style-type: none"> (a) the location is suitable for an Addiction Disorder Treatment Program; (b) the accessibility of public transportation and adequate parking; and (c) any other notable observations. <p>Please describe your assessment of the circumstances noted.</p> <p>Unknown</p>
	<p>Please check one box.</p> <p><input type="checkbox"/> LGU has visited the proposed location. Date of Visit: _____</p> <p><input checked="" type="checkbox"/> LGU has not visited, but has sufficient personal knowledge to attest to its suitability.</p> <p><input type="checkbox"/> N/A – Please explain, for example, N/A may be appropriate in applications that involve relocation within an existing building. However, factors such as capacity increase, even in an existing building, would not be appropriate for an "N/A" response.</p>
<p>7.</p> <p>Current Status of Existing Programs</p>	<p>Are you aware of any community issues with other programs operated by this provider, or in the case of relocation, this program's current location? (i.e., any issues around loitering, public safety, etc.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please describe any issues.</p>
<p>8.</p> <p>Community Response</p>	<p>Please describe your knowledge of the applicant's outreach to the local community (e.g., Community Service Boards, Community Boards, Planning Boards, Neighborhood Coalitions, other local municipalities). Please summarize your knowledge of community input, including any existing or likely community concerns, as well as any recommendations.</p> <p>Unknown</p>
<p>9.</p> <p>Other Comments</p>	<p>Provide additional comments.</p>
<p>10.</p> <p>LGU Recommendation</p>	<p><input checked="" type="checkbox"/> Approve <input type="checkbox"/> Disapprove</p> <p>Signature of Authorized LGU Official: <i>[Signature]</i></p> <p>Date: 4/29/24</p>

**New York State Office of Addiction Services and Supports
Bureau of Certification (OASAS)**

M E M O R A N D U M

TO: Dena Holmes

FROM: Bradford Ellis

DATE: 5/30/24

SUBJECT: Application Review

Applicant: Brooklyn Cares Addiction Center LLC

Application #: CA #2023.029 / CON #234037

Purpose: New OASAS Provider - Part 820 Residential Services and Part 816 Substance Use Disorder Withdrawal and Stabilization Services

County: KINGS

Project Summary:

Brooklyn Cares Addiction Center LLC submitted a Certification Application requesting New York State Office of Addiction Services and Supports' (OASAS) approval to become a new OASAS provider establishing Part 820 Residential Services with Stabilization and Rehabilitation elements of care along with Section 816.7 Medically Supervised Inpatient Withdrawal Services to be located at 1480 Prospect Place, Brooklyn, New York.

Brooklyn Cares Addiction Center LLC is proposing to open and operate a "home-like environment" 32 bed facility in a signal brick building that once housed Saint Joseph's Hospital's Prospect Place Clinic, in the Crown Heights neighborhood of Brooklyn. The applicant intends on servicing adults aged 18 and up with special attention focused on older adults (45 and over) and veterans.

The applicant proposes to allocate 10 beds to the Section 816.7 Medically Supervised Inpatient Withdrawal Services with the remaining 22 beds being used for their 820 Residential Services with Stabilization and Rehabilitation elements.

Need:

According to the applicant there is a great need for the proposed services in the Crown Heights neighborhood of New York City. Data provided by Brooklyn Cares Addiction Center LLC, indicates that Crown Heights was one of the hardest hit areas during the Corona Virus pandemic. The pandemic created the onset of more than 336 deaths, promoted restricted social contact, intensified isolation, increased stress and substance use. Substance Abuse and Mental Health Services Administration (SAMHSA) data collected nationally from October 2020

to December 2020, estimated 25.9 million past year users of alcohol reported they were drinking a little more or much more than they did before the COVID-19 pandemic began. This increase in use falls in line with the Center of Disease Control (CDC) data reports that are mentioned in the application that indicated New York City drug-overdose deaths increased by 36% which represented 2243 deaths by the end of March 2021 compared to 1653 deaths the prior year. The applicant reports that New York City also has a higher death rate than that of the national average. The applicant utilized data from 2021 showing New York City's rate at 15.1 deaths per 100,00 people compared to the national average of 13.1 deaths per 100,00 people. According to the New York City Health Epi Data Brief, New Yorkers ages 55 to 64 years old, had the highest rate of overdose, and the largest absolute increase in rate from 2020 to 2021.

Although there are several treatment facilities within the immediate area, Brooklyn Cares Addiction Center LLC sees a need for a Medically Supervised Detox with Stabilization and Rehabilitation Residential Services housed within one facility. They believe that this will allow for a seamless continuity of client care.

The applicant was able to submit documentation that supported their efforts for community outreach. These documents indicated that on November 7, 2022, the applicant attended a virtual meeting with Community Board 8. The applicant stated that at this meeting they discussed the impact of the opioid epidemic in Crown Heights that has been heighten by the COVID-19 epidemic and this was well received. Further documentation indicated on December 28, 2022, they met with Interfaith Hospital and discussed how their programs could work together. According to the applicant this meeting was well received. Also on January 4th, 2023, the applicant met with St. Joseph's Hospital's detox program and spoke about a linkage agreement with them for direct care. This applicant indicated that St. Joseph's Hospital believes that there is a need for services in the community. In addition, the applicant stated that they also had positive conversations with Addiction Care Interventions (ACI) and the Director of Genesis.

The New York City Department of Health and Mental Hygiene's goals and plans include reducing substance use related morbidity and mortality, focusing on the neighborhoods that are experiencing the highest burden of overdose deaths and development of advanced systems with equitable access to behavioral health care for publicly and privately insured individuals. Their annual and intermediate plans for addiction services indicated that raising awareness, reducing harm, and expanding treatment were all priorities for New York City.

The New York City Department of Health and Mental Hygiene's recommendation in support of this application was received on 4/26/24.

OASAS' New York City Regional recommendation in support of this application was received on 5/6/24.

Character and Competence:

Brooklyn Cares Addition Center LLC was established as a Domestic Limited Liability Company on 2/24/2023 with a Governing Authority consisting of three members (shares of stock and voting rights in parenthesis): Joel Kaufman (45%); Mirel Meisels (45%) and Jeffery Berman (10%). Dr Jeffery Berman has demonstrated to have the substance use disorder experience

as required by OASAS. Dr Jeffery Berman has extensive work experience within the addiction field that has spanned several decades. Joel Kaufman has been in the Brooklyn real-estate business since 2003 as a realtor and is sole owner of the company that owns the building Brooklyn Cares Addition Center LLC will be leasing. Mirel Meisels has been the owner of a property management company, Meisels Management LLC, since 2014.

Overall Financial Condition of the Provider:

The proposed annual budget identifies revenues at \$2,260,810 and expenses at \$2,640,000 leaving a total deficit of \$379,190. The applicant stated that they have a \$1,000,000 in deficit funding from Hudson Shine Capital. These numbers were derived by the applicant assuming they would have 40% occupancy rate in the first year. The applicant provided assumed revenues for years two and three resulting in a proposed 70% occupancy rate in the third year with \$4,267,872 in revenue.

The OASAS NYC Regional Office did not report concerns after review of the submitted budget.

The applicant submitted proof of funds to cover the fist six months of operating cost and deficit funding through a loan from Hudson Shine Capital.

Adequacy:

An approved lease for this location was submitted and contains the required OASAS right to re-entry language.

OASAS Facilities Evaluation and Review Unit (FEIU) completed a State Environmental Quality Review on 11/16/23 and a Floor Plan Review on 8/1/23, both reviews found that the proposed space appears to comply with the Part 814 facility regulations for service providers. FEIU did visit the site in October of 2023, noting that it was under construction, and they would conduct a physical plan inspection once the construction was completed.

Compliance:

The applicant submitted a staffing plan for the proposed Part 820 Residential Services and Section 816.7 Medically Supervised Inpatient Withdrawal services, which meet regulatory requirements.

Part 820 Stabilization Rehabilitation (22 beds)

.50 FTE	Executive Director	(1 Part time)
1.00 FTE	Clinical Director (CASAC)	(1 Full time) Full Time CASAC
.25 FTE	Medical Director (Physiatrist)	(1 Part time)
1.00 FTE	Registered Nurses	(2 Full time) QHP Other
3.50 FTE	LPN	(2 Full time 3 Part time)
2.00 FTE	Counselors either: CASAC	(2 Full time)
.50 FTE	Counselor (LMNC/LCSW)	(1 Part time)
.25 FTE	Vocational	(1 Part time)

3.00 FTE	CASAC-T	(3 Full time)
.50 FTE	CRPA	(1 Part time)

Section 816.7 Medically Supervised Inpatient Withdrawal services (10 beds)

.25 FTE	Medical Director (Physiatrist)	(1 Part time)
.50FTE	Executive Director	(1 Part time)
2.0 FTE	Registered Nurses	(2 Full time) QHP Other
3.0 FTE	LPN	(3 Full time)
2.0 FTE	Counselors CASAC	(2 Full time)
2.0 FTE	CASAC-T	(2 Full time)
.50 FTE	CRPA	(1 Part time)

Policies and procedures for both Part 820 and Section 816.7 have been reviewed for regulatory compliance and are accepted by OASAS.

Continuity of Care:

The applicant addresses continuity of care within their submitted policies and procedures. The applicant has reached out to several existing providers to help facilitate a continuity of care for the clients the proposed program will serve. Specifically, the applicant has reached out to the Allure Group, and according to the applicant they are pleased to welcome their services in Crown Heights and work with them upon commencement of providing certified services. The same outreach for developing relationships to provide a fluid continuity of care with similar responses also occurred with ACI, and Genesis. A meeting was held with the staff at Interfaith Hospital to introduce the proposed program. The applicant stated that this meeting went well and reports that Interfaith Hospital is looking forward to working with Brooklyn Cares Addiction Center. Lastly, the applicant reported speaking with St. Joseph's Hospital detox program and will be signing a linkage agreement with them upon opening.

Recommendation:

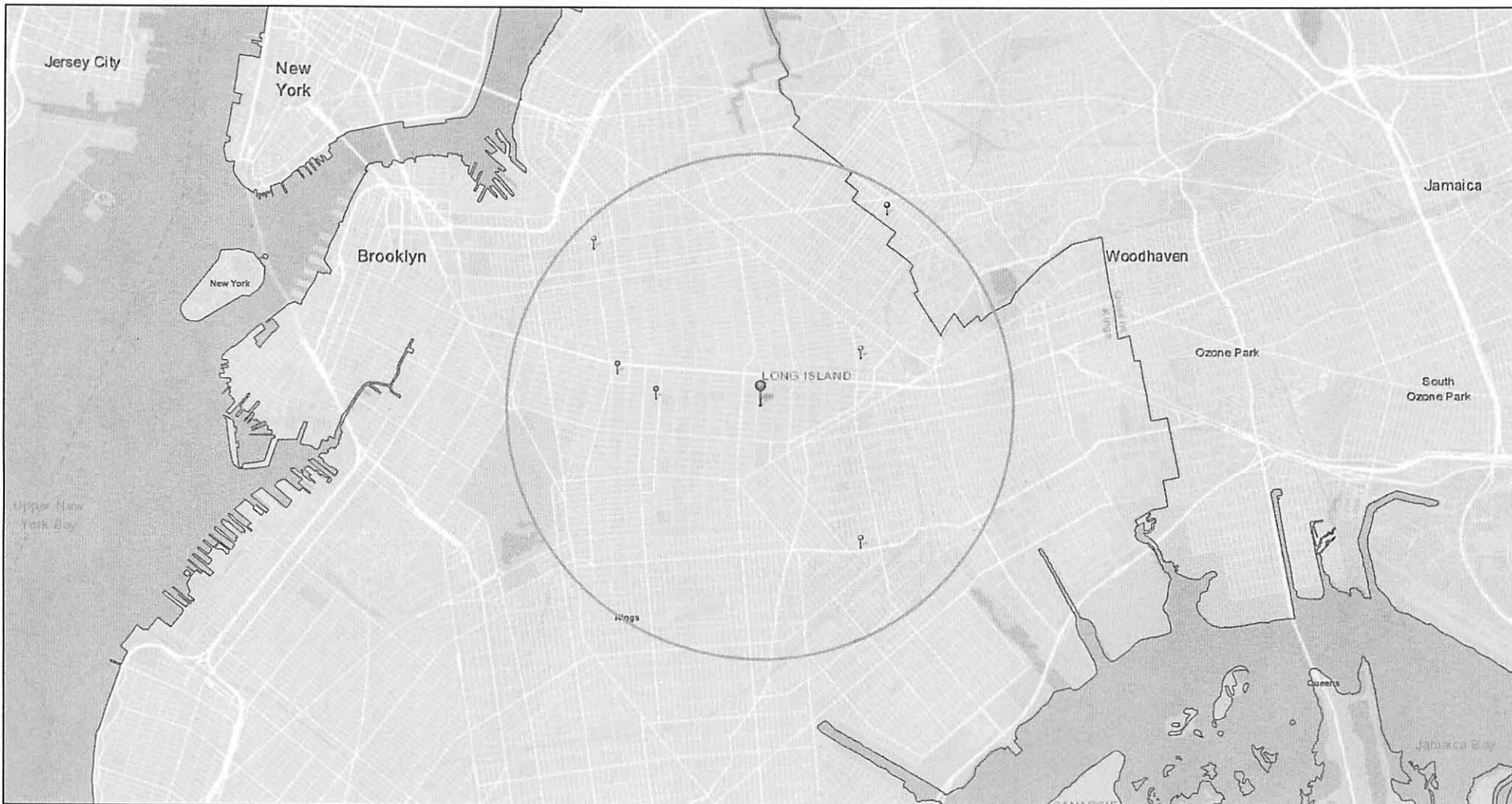
OASAS recommendation is to approve the request from Brooklyn Cares Addiction Center LLC to become a new OASAS Provider establishing a Part 820 Residential Services with Stabilization and Rehabilitation elements and Section 816.7 Medically Supervised Inpatient Withdrawal Services, with the following contingencies:

- Verification of the hiring of sufficient staff to meet regulatory requirements.
- OASAS inspection and approval of the completed facility
- Copy of filing receipt from the NYS Department of State indicating that the amended Certificate of Incorporation/Articles of Organization, including the OASAS required language, have been filed.

Effective Date: TBD

Attachments: LGU recommendation, maps

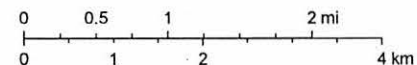
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| Certified Residential Treatment Programs | 📍 Intensive Residential |
| 📍 820 Stabil Rehab Reintegration | 📍 Community Residential |
| 📍 820 Stabil and Rehab | ▭ County |
| 📍 Residential Rehab for Youth | |



NYC OpenData, State of New Jersey, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA, Esri, HERE

NEW YORK STATE OFFICE OF ADDICTION SERVICES AND SUPPORTS
LOCAL GOVERNMENTAL UNIT REVIEW REPORT
(Addiction Disorder Services Certification Actions)

Applicant's Legal Name Brooklyn Cares Addiction	Application No. CA #2023.029 CON #234037
Local Governmental Unit NYC Department of Health and Mental Hygiene	
In conjunction with the certification action(s) submitted by the above applicant, you are requested to review and provide comments on the proposed actions relative to the provision of addiction disorder services in your jurisdiction. Your comments are important in evaluating the merits of the action(s). In completing the responses, use additional sheets as necessary. Your cooperation in providing complete and thorough responses is appreciated as incomplete replies will delay the processing of this application.	
1. Consistency of Program Description and Site Location with Local/OASAS Requirements	In the case of new providers and/or new services, is the program description and site location consistent with local/OASAS requirements: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below. Brooklyn Cares Addiction Services is proposing to become a new OASAS provider of Parts 816 and 820 programs at 1480 Prospect Place Brooklyn NY, 11213. The applicant will provide services to the entire community but will focus on adults older adults and Veterans. The applicant will offer initiation and maintenance of medication for addiction treatment including Buprenorphine. They will seek to become an OOPP and will offer overdose education and distribute Naloxone to participants.
2. Provider Operational Performance	Is the operational performance of this provider satisfactory? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Regardless of the answer, provide a description of the operational performance of the provider below. This is not an allocated provider and the Department can only go by the information provided on the application. The information appears to indicate that operational performance of this provider would be satisfactory.
3. Adequacy of Financial Plans	Is the financial plan in the proposal adequate and acceptable? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below. This is not an allocated provider and the Department can only look at the information provided in the application. This information appears to be acceptable. Where applicable, please note any comments related to Medicaid policy and/or reimbursement practices below. The applicant will accept Medicaid(Manage Care), Medicaid(Fee for Service), Medicare and Private Health Insurance(Managed Care & Fee for Service.)
4. Consistency with Local Plans and Local/Community Needs	Is the action consistent with local plans and/or does it meet community needs? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Provide explanation below. According to the NYC EPI Data, In 2022, 3,026 New Yorkers died of a drug overdose, a 12% increase from 2021 (2,696 deaths), and the highest number since reporting began in 2000. From 2021 to 2022, Brooklyn residents experienced the largest increase in the rate of overdose death (from 27.4 to 32.2 per 100,000). Black New Yorkers, who comprise the majority in Crown Heights had the highest rate of overdose death, and the largest increase in rate from 2021 to 2022 (52.0 to 62.0 per 100,000 residents
5. Provider Standing in the Community	Is there any known information regarding the provider's standing in the community? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Applicable Regardless of the answer, provide all known information below or on additional sheets attached to this report. This is a new provider seeking to establish substance use services in the Crown Heights community. The applicant's application is being guided by knowledgeable consultants familiar with current OASAS regulatory requirements. They appear to be familiar with the community to be served and have begun networking with other social service provider. They plan to focus on servicing older adults and veterans

<p>6.</p> <p>Program Location</p>	<p>In answering this question, the following should be taken into consideration:</p> <ul style="list-style-type: none"> (a) the location is suitable for an Addiction Disorder Treatment Program; (b) the accessibility of public transportation and adequate parking; and (c) any other notable observations. <p>Please describe your assessment of the circumstances noted.</p> <p>The location for this program is the formerly St. Joseph's Hospital located in the bustling Crown Heights area of Brooklyn. This is a residential neighborhood consisting of brick row houses, street parking, corner delis and supermarkets. The area is accessible by public transportation including NYC bus lines Q58 and Q18, in addition to the subway C line.</p>
	<p>Please check one box.</p> <p><input type="checkbox"/> LGU has visited the proposed location. Date of Visit: _____</p> <p><input checked="" type="checkbox"/> LGU has not visited, but has sufficient personal knowledge to attest to its suitability.</p> <p><input type="checkbox"/> N/A – Please explain, for example, N/A may be appropriate in applications that involve relocation within an existing building. However, factors such as capacity increase, even in an existing building, would not be appropriate for an "N/A" response.</p> <p>N/A</p>
<p>7.</p> <p>Current Status of Existing Programs</p>	<p>Are you aware of any community issues with other programs operated by this provider, or in the case of relocation, this program's current location? (i.e., any issues around loitering, public safety, etc.) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please describe any issues.</p> <p>There are no known issues to the DOHMH.</p>
<p>8.</p> <p>Community Response</p>	<p>Please describe your knowledge of the applicant's outreach to the local community (e.g., Community Service Boards, Community Boards, Planning Boards, Neighborhood Coalitions, other local municipalities). Please summarize your knowledge of community input, including any existing or likely community concerns, as well as any recommendations.</p> <p>The applicant provided a letter signed by District Manager Michelle George of the Brooklyn Community Board #8 written on 2/2/2023, acknowledging receipt of notification from the applicant of plans to open an OASAS Part 820 Residential Services and Section 816.7 Medically Supervised Inpatient Withdrawal program at 1480 Prospect Place Brooklyn NY, 11213.</p>
<p>9.</p> <p>Other Comments</p>	<p>Provide additional comments.</p> <p>N/A</p>
<p>10.</p> <p>LGU Recommendation</p>	<p><input checked="" type="checkbox"/> Approve <input type="checkbox"/> Disapprove</p> <p>Signature of Authorized LGU Official: </p> <p>Date: 4/26/24</p>

**New York State Office of Addiction Services and Supports
Bureau of Certification (OASAS)**

M E M O R A N D U M

TO: Dena Holmes, Director
Bureau of Certification

FROM: Brian Grandy

DATE: June 6, 2024

SUBJECT: Application Review

Applicant: The Richmond Center for Recovery and Wellness, LLC.

Application #: 2024.003 / CON# 244003

Purpose: New OASAS Provider

County: Richmond

Project Summary:

The Richmond Center for Recovery and Wellness, LLC (RCRW) submitted a Certification Application requesting New York State Office of Addiction Services and Supports (OASAS) approval to become a new OASAS Provider for Part 818 Inpatient Rehabilitation Service (16 beds) and Part 816 Section 7 Medically Supervised Inpatient Withdrawal and Stabilization Services (10 beds) to be located at 530 Sharrotts Road, Staten Island, New York 10309.

According to the applicant, RCRW's treatment philosophy is to treat all patients served with respect and dignity. Their person-centered treatment approach includes educating patients with real-life tools that will lead them to long-term recovery. These tools include psychoeducation and skills groups, primary individual counseling, extensive case management, peer services, and aftercare placement with initial appointments prior to discharge from their program. RCRW believes that offering a continuum of care which includes medically supervised detox, inpatient care, and case management will assist their patients to overcome the challenges of addictions to help them improve their quality of life.

RCRW encourages their clients to utilize 12 step programming, including Alcoholics Anonymous (AA) and Narcotics Anonymous (NA). As a part of their philosophy, RCRW believes that these fellowships assist persons in recovery with the strongest known supports. RCRW's treatment will also include exposure to these groups as they will host AA/NA meetings.

Need:

Through RCRW's strategic planning process, they have determined that their proposed Part 818 and 816 Section 7 programming will improve the quality of life in Richmond County. This planning included the use of Community Board #3's, "Statement of Community District Needs and Community Boards Budget Requests for FY2023". In this report it was noted that,

- According to the Staten Island District Attorney's Office in 2021, it reported that a total of 173 drug overdoses had occurred on Staten Island between January 1st and September 28th of that year. Of these overdoses, 66 were fatal.
- Funding for outreach services to encourage rehabilitation for substance use and mental health issues was identified as a priority.

Recent data obtained from the New York State County Opioid Quarterly Report – April 2024 Edition shows that 140 overdose deaths occurred in Richmond County in 2022, with 129 involving synthetic opioids other than methadone (including illicitly produced opioids such as fentanyl). Also included in this report, there was 286 Outpatient Emergency Department visits involving opioid-related overdose, and 107 hospitalizations involving opioid-related overdose in 2022. Information regarding 2023 totals were not available at the time of this summary.

RCRW had contacted Community Board #3 notifying them of the proposed action and received a letter of support.

Additional letters of support were received from:

- Minority Leader of Council District 51 Joseph Borelli.
- Councilmember David M. Carr of the 50th District.
- Congresswoman of New York's 11th District Nicole Malliotakis.
- Assemblymember of the 64th District Michal Tannousis.
- Assemblyman Sam Pirozzolo of the 63rd District.
- Staten Island District Attorney Michael E. McMahon.
- Assemblyman of the 62nd District Michael Reilly.
- YMCA and Community Board #3 Member Celia Iervasi.

According to the OASAS Data Warehouse and Bureau of Certification, there is one certified Inpatient Rehabilitation Program and no Inpatient Medical Supervised Withdrawal Programs on Staten Island.

On May 31, 2024, OASAS Bureau of Certification received a completed Local Government Unit Review Report (PPD-6) from New York City Department of Health and Mental Hygiene recommending that this project move forward. This recommendation included the need that these programs would be fulfilling regarding treatment gaps on Staten Island. Furthermore, it was stated in this report that the Stapleton-St. George and Port Richmond have high rates of unintentional drug overdose deaths, in which 80% can be attributed to fentanyl in the illicit drug supply.

On April 26, 2024, OASAS Bureau of Certification received a completed Regional Office Review Report (PPD-7) from New York City Regional Office with a positive recommendation

for this action. This report also identified a statement made earlier in this summary that there are no Part 816 services on Staten Island and limited (one) Part 818 services. Furthermore, the PPD-7 Report stated that their Regional Office received two letters of support for this action, one from a politician and one from a community provider.

Character and Competence:

RCRW is a newly formed LLC, established with Department of State in April of 2023. The entity is owned by Jennifer Palmeieri, RN (70%), Suzanne Conte (10%), Steve Margarella (10%), and Floyd Miller (10%). All the owners hold voting rights equal to their ownership percent.

Jennifer Palmiere is a licensed Registered Nurse with over 18 years of healthcare experience. Ms. Palmiere holds Registered Nursing licenses in both the State of New York and New Jersey and is a member of American Society of Addiction Medicine (ASAM). Jennifer's business experience includes being the CEO of two companies, Vesta RN Reporting Services Inc. (Telemedicine Patient Care in the NYC area), and Aurora RN Comprehensive Services, PLLC (No-Fault and Workers Comp case physical and evaluations). Ms. Palmiere meets the OASAS required experience in substance use disorder services.

Suzanne Conte, also the proposed programs' Director of Patient Services, holds the following credentials:

- Licensed Clinical Alcohol and Drug Counselor (State of New Jersey).
- Addictions Professionals Board Approved CADC/LCADS Education Trainer (State of New Jersey).
- Certified Clinical Supervisor (State of New Jersey).
- International Certified Alcohol and Drug Counselor (Addiction Professionals Certification Board Reciprocity Consortium).

Ms. Conte is also on the board of directors for Inter-County Council on Drug and Alcohol Abuse, Inc., based in New Jersey and meets the OASAS required experience in substance use disorder services.

Floyd Miller is an Advanced Credentialed Alcoholism and Substance Abuse Counselor (CASAC) and has been in the Substance Use Disorder (SUD) field since 2005. Since 2014, Mr. Miller has utilized his experience and knowledge by engaging as a Narcan Trainer. Since 2005 Mr. Miller has gained experience in the private, education, and government sectors, to include the Office of Addiction Services and Supports' (OASAS) South Beach Addiction Treatment Center (ATC). Mr. Miller meets the OASAS required experience in substance use disorder services.

Stephen Margarella is an entrepreneur, local business owner, person in recovery, mentor for people in recovery, and founder of Grace Bay Residence, LLC a sober living facility for women in St. Petersburg Florida.

Mr. Margarella has a history of community involvement including,

- Being a founding member of the Children's Advocacy and the Professional Business Alliance.

- Former Chairman for the Staten Island Friends for Hospice Care.
- Former Member of the Board of Directors from the Iron Hills Civic Association.

Overall Financial Condition of the Provider:

The applicant submitted a proposed yearly budget outlining expenses at \$ 2,874,137, revenues of \$4,113,210 leaving a balance of \$ 1,239,073. RCRW estimates that their revenue stream will come from Medicaid (Managed Care) and Private Health Insurance (Managed Care). RCRW will also accept patients that are self-pay (uninsured), and Medicare (Managed Care).

No OASAS funding is being requested for this action.

The applicant has submitted documentation to indicate sufficient funds to sustain six-months of start-up costs.

Adequacy:

The site for this proposed service is located at 530 Sharrotts Road in Staten Island. This building will be newly constructed and will consist of one floor encompassing 11,516.4 square feet of space used for programming. It is estimated that the construction will be completed in approximately 10 months. The facility is accessible by public transportation through an MTA bus terminal which is approximately 1.5 miles away. This MTA bus terminal offers extensive bus routes along Arthur Kill Road. This future site will include 24 parking spaces with an additional 12 parking spaces on the adjacent lot.

Compliance:

The applicant submitted a staffing plan which meets regulatory requirements and includes a full-time Director of Services, a Medical Director, and two full-time Assistant Administrative Administrators. Their medical staff include a Psychiatrist, a Nurse Practitioner, a full-time Director of Nursing, four Registered Nurses (RN), five Licensed Practical Nurses (LPN), and two certified medical assistants. Clinical staff for RCRW include a full-time Program Director two full-time CASAC's, two full-time Licensed Clinical Social Workers, and two behavioral health technicians. Other staff include kitchen aides, receptionists, security, and clerical staff.

Continuity of Care:

Within RCRW's policies and procedures, they ensure that each client is involved with clinical staff for ongoing and around the clock care management.

Staff at RCRW will engage in regular clinical supervision. Supervision will include the following methods: One on one supervision, multidisciplinary clinical treatment team meetings, client care monitoring, and group supervision. Staff members at RCRW will also receive on the job trainings by qualified personnel before the use of any clinical or medical tools (e.g.: assessment and screening tools, documentation).

RCRW is in the process of finalizing a transfer agreement with Staten Island University Hospital for clients that are in the need of ambulatory or inpatient medical care.

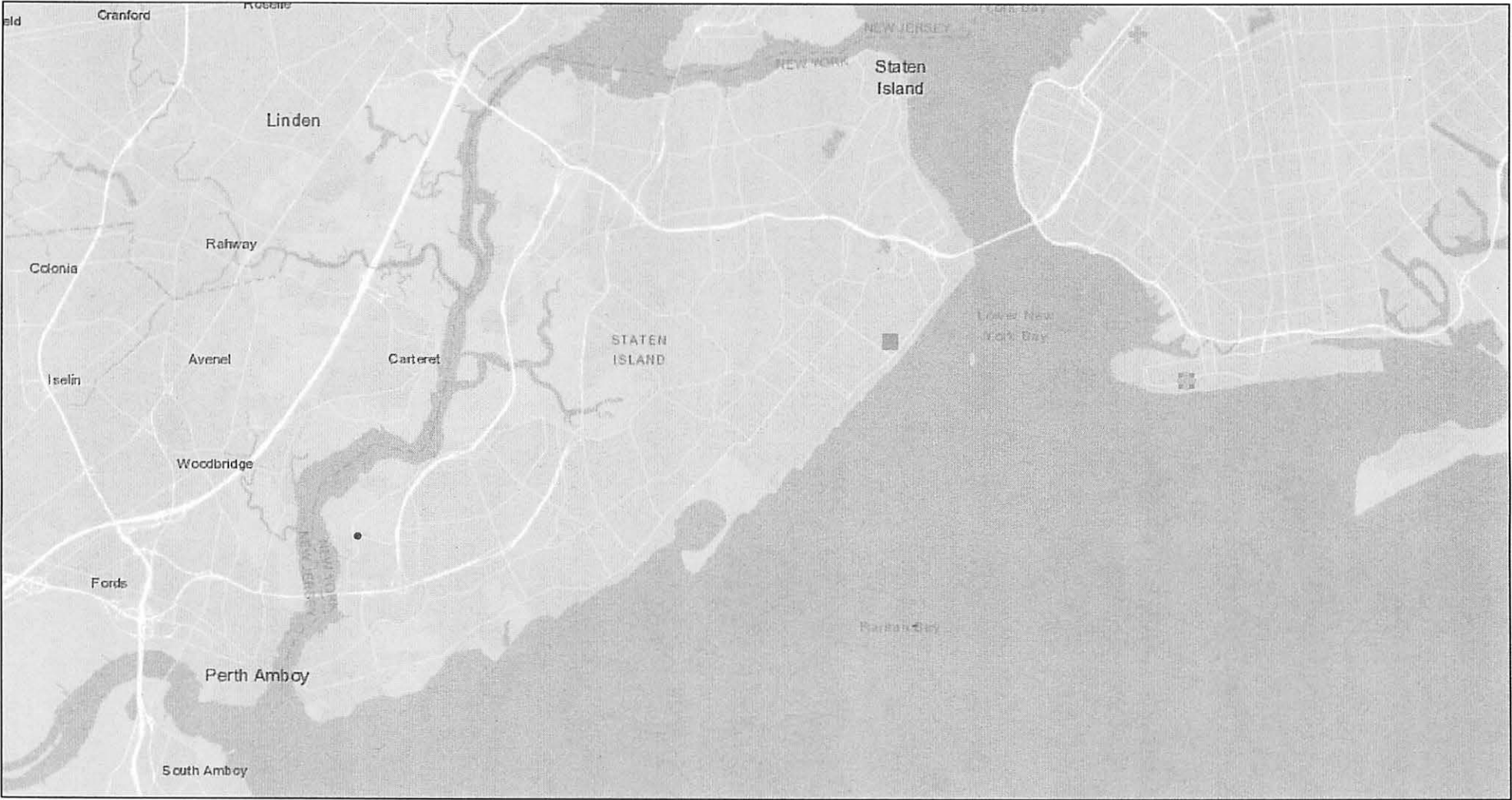
Recommendation:

OASAS recommendation is to approve the request from Richmond Center for Recovery and Wellness, LLC to become a new OASAS Provider of Part 816.7 Medically Supervised Inpatient Withdrawal and Stabilization Program and Part 818 Inpatient Rehabilitation Program with the following contingencies:

- Verification of the hiring of sufficient staff to meet regulatory requirements.
- OASAS inspection and approval of the completed facility
- Copy of filing receipt from the NYS Department of State indicating that the amended Certificate of Incorporation/Articles of Organization, including the OASAS required language, have been filed.
- Finalized revisions and submission of Policies and Procedures to meet all regulatory guidelines.



Attachments: – LGU recommendation, maps

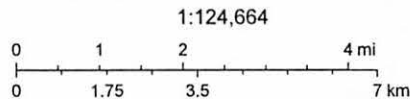
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Certified Crisis Programs


-  Med Sup Withdrawal - Inpatient
-  Inpatient Rehabilitation



NYC OpenData, State of New Jersey, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, NPS

NEW YORK STATE OFFICE OF ADDICTION SERVICES AND SUPPORTS
LOCAL GOVERNMENTAL UNIT REVIEW REPORT
(Addiction Disorder Services Certification Actions)

Applicant's Legal Name Richmond Center for Wellness and Recovery	Application No. NYSE CON# 244003
Local Governmental Unit NYC Department of Health and Mental Hygiene	
<p>In conjunction with the certification action(s) submitted by the above applicant, you are requested to review and provide comments on the proposed actions relative to the provision of addiction disorder services in your jurisdiction. Your comments are important in evaluating the merits of the action(s). In completing the responses, use additional sheets as necessary. Your cooperation in providing complete and thorough responses is appreciated as incomplete replies will delay the processing of this application.</p>	
1. Consistency of Program Description and Site Location with Local/OASAS Requirements	<p>In the case of new providers and/or new services, is the program description and site location consistent with local/OASAS requirements: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below.</p> <p>Richmond Center for Wellness and Recovery (RCWR), LLC, is proposing to become a new OASAS provider by establishing a 26-swing bed Part 816.7 and Part 818 inpatient program (stabilization and rehabilitation) at 350 Sharrots Road, Staten Island, NY 10309. Service provisions will include holistic care that responds to the need for such services in Richmond County. On-site access to buprenorphine, harm reduction education and Narcan kits will be distributed to participants.</p>
2. Provider Operational Performance	<p>Is the operational performance of this provider satisfactory? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Regardless of the answer, provide a description of the operational performance of the provider below.</p> <p>Richmond Center for Wellness and Recovery is not an allocated provider and the Department can only look at the information provided in the application which appears to be satisfactory.</p>
3. Adequacy of Financial Plans	<p>Is the financial plan in the proposal adequate and acceptable? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Provide explanation below.</p> <p>Richmond Center for Wellness and Recovery is not an allocated provider and the Department can only look at the information provided in the application, which appears to be satisfactory.</p> <p>Where applicable, please note any comments related to Medicaid policy and/or reimbursement practices below. Applicant will accept Medicaid Managed Care.</p>
4. Consistency with Local Plans and Local/Community Needs	<p>Is the action consistent with local plans and/or does it meet community needs? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Provide explanation below.</p> <p>The proposed program would address treatment gaps in Staten Island since this program type does not currently exist in the area. For example, Stapleton-St. George and Port Richmond have high rates (46.0 and 58.0 per 100,000 residents, respectively) of unintentional drug poisoning (overdose) deaths by neighborhood of residence, New York City, 2022. Eighty percent of these deaths can be attributed to the presence of fentanyl in the drug supply.</p>
5. Provider Standing in the Community	<p>Is there any known information regarding the provider's standing in the community? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Regardless of the answer, provide all known information below or on additional sheets attached to this report.</p> <p>Richmond Center for Wellness and Recovery has well-established relationships with community-based organizations and health care providers, has kept NYC Richmond Community Board District 3 apprised of their plans to apply to OASAS as a new provider of a 26 bed SUD service, and have presented their policies and procedures.</p>

<p>6.</p> <p>Program Location</p>	<p>In answering this question, the following should be taken into consideration:</p> <ul style="list-style-type: none"> (a) the location is suitable for an Addiction Disorder Treatment Program; (b) the accessibility of public transportation and adequate parking; and (c) any other notable observations. <p>Please describe your assessment of the circumstances noted.</p> <p>The proposed program would be located in a residential area of Staten Island with limited street parking. However, the proposed site is accessible by and nearby MTA local bus lines S74 and S84, and express bus lines (from Manhattan) SIM23, SIM24, and SIM 26, as well as the Staten Island Ferry. There are several schools in the vicinity of the proposed site.</p>	
	<p>Please check one box.</p> <p><input type="checkbox"/> LGU has visited the proposed location. Date of Visit: _____</p> <p><input checked="" type="checkbox"/> LGU has not visited, but has sufficient personal knowledge to attest to its suitability.</p> <p><input type="checkbox"/> N/A – Please explain, for example, N/A may be appropriate in applications that involve relocation within an existing building. However, factors such as capacity increase, even in an existing building, would not be appropriate for an “N/A” response.</p>	
<p>7.</p> <p>Current Status of Existing Programs</p>	<p>Are you aware of any community issues with other programs operated by this provider, or in the case of relocation, this program’s current location? (i.e., any issues around loitering, public safety, etc.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please describe any issues.</p> <p>There are no known issues.</p>	
<p>8.</p> <p>Community Response</p>	<p>Please describe your knowledge of the applicant’s outreach to the local community (e.g., Community Service Boards, Community Boards, Planning Boards, Neighborhood Coalitions, other local municipalities). Please summarize your knowledge of community input, including any existing or likely community concerns, as well as any recommendations.</p> <p>Richmond Center for Wellness and Recovery received a letter from Richmond Community Board District 3 dated February 22, 2023, acknowledging their proposed action to establish a new 26-bed treatment service at 350 Sharrots Road, Staten Island, NY 10309.</p>	
<p>9.</p> <p>Other Comments</p>	<p>Provide additional comments.</p> <p>N/A</p>	
<p>10.</p> <p>LGU Recommendation</p>	<p><input checked="" type="checkbox"/> Approve <input type="checkbox"/> Disapprove</p>	<p>Signature of Authorized LGU Official</p>  <p>Date</p> <p>5/31/24</p>