



MEMORANDUM

TO: Commissioners

FROM: Jeanne Marie Gawel, Chief of Facility Planning

DATE: May 21, 2026

SUBJECT: Pediatric Home Health Emergency Certificate of Need

In accordance with the regulations, the issuance of an Emergency Certificate of Need (ECON) is on the agenda of the next scheduled Commission meeting for confirmation by the Commission. MHCC staff is seeking confirmation of an ECON for Comprehensive Nursing Services, Inc. (CNS) for any counties they are not currently authorized to serve to address critical gaps in pediatric home health access across Maryland. CNS is a specialty home health agency that has a Certificate of Need (CON) to serve pediatric clients less than 21 years of age and maternal/newborn dyads who are residents of Baltimore City, Anne Arundel, Baltimore, Carroll, Cecil, Harford, and Howard Counties.

Summary

On April 13, 2026, the Maryland Health Care Commission was contacted about the lack of home health agencies (HHA) serving pediatric patients in Washington County. Historically, pediatric home health services had been provided by SpiriTrust Lutheran Home Care & Hospice (Maryland license HH 7153). Despite assurances to MHCC to the contrary, the HHA is now found to have ceased serving pediatric patients after it was acquired by Adoration Home Health Care Maryland, LLC d/b/a BrightSpring Health Services in 2024.

On April 14, 2026, Comprehensive Nursing Services, Inc. d/b/a Comprehensive Home Health Services (CNS), a licensed home health agency (HHA) submitted a Request for an Emergency Certificate of Need (ECON) to provide pediatric home health care services throughout Maryland in response to an identified home health service gap for pediatric patients in Washington County. On April 16, 2026, the Executive Director granted an ECON for Washington County to address immediate access needs. The broader request to provide home health services to pediatric patients for all Maryland jurisdictions was delayed allowing staff to conduct a gap analysis of pediatric HHAs.

Utilizing data from the Commission's 2024 Annual Home Health Survey, a subsequent gap analysis has revealed a systematic lack of pediatric-capable home health agencies (HHAs) providing services in many Maryland counties, including Allegany, Caroline, Kent, Queen Anne, Somerset, Talbot, Washington, Wicomico and Worcester. The discharge planner that worked with MHCC staff on this ECON also reported difficulty finding pediatric services in Anne Arundel, Montgomery and Prince George's County. There are only two jurisdictions (Baltimore City and County) that show no significant service gaps. Only three agencies (CNS and two Johns Hopkins

entities) are currently identified as consistently providing a full array of pediatric home health services.

Currently there are five pending CON applications from two providers that may address some of the need for pediatric home health services in the State. However, both are Residential Service Agencies (RSAs) and the transition from RSA to HHA may require time to fully implement.

The impact of approving the statewide ECON will be highly positive as it will provide immediate relief to existing barriers to hospital discharge of pediatric patients. Existing HHAs are not expected to be impacted, as most are currently unwilling or unable to meet this population's needs.

Staff Recommendations

1. **Immediate Action:** Confirm the CNS ECON for any counties they are not currently authorized to serve: Allegany, Calvert, Caroline, Charles, Dorchester, Frederick, Garrett, Kent, Montgomery, Prince George's, Queen Anne's, Somerset, St. Mary's, Talbot, Washington, Wicomico, and Worcester Counties.
2. **Long-Term Policy Review:** Address the underlying shortage during the upcoming Home Health State Health Plan Chapter review by:
 - Create the opportunity for pediatric-specific CON applications.
 - Engage existing HHA providers to assess the barriers to serving pediatric and other underserved populations and determine their willingness and capacity to serve such populations.

