

EXHIBIT 11



Office of Addiction Services and Supports

KATHY HOCHUL
Governor
CHINAZO CUNNINGHAM, MD
Commissioner

February 11, 2022

To Whom it May Concern:

I am writing this letter in relation to Medical Arts Sanitarium, Inc. d/b/a Cornerstone of Rhinebeck ("Cornerstone"). Cornerstone currently operates a total of four programs certified by the NYS Office of Addiction Services and Supports (OASAS), of which two are located at 500 Milan Hollow Road, in Rhinebeck – a Part 818 Inpatient Rehabilitation Service and a Part 816 Medically Supervised Inpatient Withdrawal & Stabilization Service, pursuant to Title 14 New York Codes, Rules and Regulations (NYCRR). At this time, the Part 818 Inpatient Rehabilitation Service has an approved capacity of 93 beds and the Part 816 Medically Supervised Inpatient Withdrawal & Stabilization Service has an approved capacity of 6 beds.

The Inpatient Rehabilitation Service, located on the 2nd Floor of Building 1 at 500 Milan Hollow Road, provides a safe and supportive setting for individuals who have stabilized in their withdrawal symptoms but where other factors indicate the need for longer-term 24-hour, 7-day a-week care. Cornerstone acquired the Inpatient Rehabilitation Service program in 1996.

Since that time, Cornerstone has sought an increase in the program's certified capacity on multiple occasions. Program capacity increases are achieved via submission of an OASAS Chemical Dependence Certification Application. Part V of that application requires the provider to demonstrate a need for the additional capacity/beds being requested. In each instance, Cornerstone has sufficiently documented local need for such capacity increase and has obtained OASAS approval.

In fact, since March 2020, Dutchess County has witnessed an increased demand for substance use disorder (SUD) treatment, particularly the need for inpatient beds. According to Dutchess County's 2020 local mental hygiene plan, unmet SUD needs worsened as described below:

- *Dutchess County experienced a record 93 fatal drug overdoses in 2017.*
- *The overdoses show increased rates of Fentanyl in addition to heroin and prescription opioids.*
- *Data suggests an increase in opioid experimentation among the adolescent population.*
- *Community providers notice increased rates of cocaine abuse.*

Dutchess County has identified a goal to address unmet need by reducing fatal overdoses in the county and reducing the rate of hospital emergency department admissions for heroin/opioid overdose.

Part II of the Certification Application requires providers to describe the space to be utilized for the additional capacity/beds. The proposed space is then reviewed and approved by OASAS' Facility Unit. The Certification Application also requires submission of a revised budget and staffing plan to meet the demand for the new capacity/ beds.

Prior to submitting any application, a provider must first complete a Prior Consultation with the local OASAS Regional Office and Local Government Unit (LGU). It is during this Consultation

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that the provider is expected to describe the certification action desired and explain the justification for the action. The Certification Application cannot be submitted without the approval of the OASAS Regional Office and LGU (in this case, Dutchess County), who also must then provide final recommendation upon completing review of the submitted application.

Following the most recent capacity increase request, in 2016, Cornerstone is now certified for 93 patients at the Inpatient Rehabilitation Service program at 500 Milan Hollow Road, Rhinebeck.

Over the past 20 years, OASAS has consistently deemed this program to be "In Good Standing". During that time, OASAS has performed eight recertification reviews of the program, with it achieving a rating of "Substantial Compliance" in seven of those reviews.

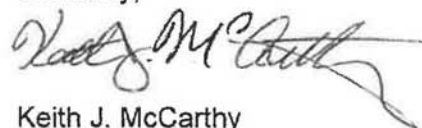
Similarly, OASAS certifies Cornerstone's 6-bedded Medically Supervised Inpatient Withdrawal & Stabilization Service on the Ground Floor at 500 Milan Hollow Road. These services afford patients an array of detoxification services, while ensuring a comprehensive discharge planning mechanism that enhances the patient's ability to enter treatment after the completion of the withdrawal service. The goals of these services are: 1) to provide the patient with a safe and humane withdrawal from chemicals of abuse; 2) to reduce the medical and psychiatric morbidity and mortality sometimes associated with acute withdrawal; and 3) to encourage the patient to engage in ongoing treatment of his/her dependence.

Since initial certification, OASAS has performed six recertification reviews of this program, with it achieving a rating of "Substantial Compliance" in four of those reviews. In 2017 and 2019, the program was awarded a "Partial Compliance" rating – due to the program's fiscal viability scores. Those identified issues have since been rectified, to the satisfaction of OASAS.

After receiving OASAS approval to increase the capacity of this program 6 to 16 in 2006, the program then reduced its capacity back down to 6 in 2008. It has remained at that capacity for the past 13 years.

Should you have any questions regarding Cornerstone or OASAS processes, please do not hesitate to contact me at (518) 485-2257.

Sincerely,



Keith J. McCarthy
Associate Commissioner
Division of Quality Assurance &
Performance Improvement

cc: Sean M. Byrne
Trishia Allen, Esq.