

NIAGARA COUNTY COMMUNITY SERVICES BOARD

5467 UPPER MOUNTAIN ROAD, SUITE 200
LOCKPORT, NEW YORK 14094-1854

August 8, 2022

Janet L. Paloski, Director, Bureau of Certification
NYS Office of Addiction Services and Supports
1450 Western Avenue
Albany, NY 12203

Re: Recovery Center of Niagara, LLC
OASAS application # CA 2021.077

Dear Ms. Paloski:

I am in receipt of correspondence from NYS OASAS, dated August 2, 2022, regarding the Recovery Center of Niagara, LLC - application #CA 2021.077. The Niagara County Community Services Board (CSB) wishes to provide additional information to OASAS and the Behavioral Health Services Advisory Council (BHSAC) regarding our review and recommendation for the above referenced application for Part 816 detox/withdrawal, and Part 818 inpatient rehabilitation services.

First and foremost, the CSB took into consideration **all** of the information that was presented to the CSB regarding the proposal, including information provided in person by:

- Eastern Niagara Hospital representatives Anne McCaffrey, Ann Briody Petock, David Godfrey, and Maralyn Militello;
- Catholic Health System's Mount St. Mary Hospital representative CJ Urlaub;
- Northpointe Council representative Marlon Thornton;
- Cazenovia Recovery Services representative Kristin Minevini;
- Save the Michaels of the Word representative Avi Israel; and
- Newfane Community representative Bruce Barnes.

Some of the providers expressed worry about staffing. The Board is keenly aware of workforce concerns across our service sector and is locally engaged in discussions on a range of methods to address. The CSB is also aware, however, of the continuing increase in need. If the Board were to decline support for one program due to workforce, the Board would then need to decline to support **any** new program development or expansion. This does not appear to be feasible or responsible. Further, the proposed Recovery Center of Niagara is located in a community that has lost employers and businesses in recent years. The Newfane community has expressed optimism that the Recovery Center will provide employment opportunities for local residents.

When evaluating the proposal, the CSB took into account a range of information supporting the need for **additional** Part 816 and 818 beds, including but not limited to:

- The increase in use/misuse of alcohol and other drugs during the COVID-19 pandemic and the significant rise in Opioid related overdoses and fatalities. From 2019 to 2021, the County's total opioid related overdoses increased by 65%. The number of fatalities tripled.

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- The **Niagara County Local Services Plan for 2021 and for 2022**, which for both years indicates a **Priority Goal** related to **Inpatient Treatment**. Specifically stating “Niagara County residents will have **increased and timely** access to OMH inpatient beds, as well as **OASAS inpatient detoxification and rehabilitation beds**, to meet the individual needs of consumers”;
- **Referral Data, including declined referrals**. For example, **forty percent (40%)** of referrals to the two (2) existing Part 818 programs were declined. **One program declined more than 70% of referrals** received. The most common reasons for referral declination were: need for detoxification services; co-occurring medical or mental health concerns; and methadone medications;
- There is only **one Part 816** Withdrawal and Stabilization (Detox) program in Niagara County, located on the other end of the county, approximately **30 miles** from the proposed Recovery Center of Niagara site;
- The importance of consumer choice and the opportunity to have more than one choice of local programs through which to receive services; and
- Letter of support from the Town of Newfane for the proposed project.

The CSB concluded that **need** above and beyond the **current existing** Part 816 and Part 818 beds was substantiated.

Regarding bed utilization, the CSB also evaluated information presented from the NYS DOH Public Health & Health Planning Council Meeting from April 5, 2022 in which it was noted that **the 30 Part 818 Inpatient SUD beds at Eastern Niagara Hospital’s Reflections Unit will close in 2023**. Thus, there will be 30 fewer Part 818 beds in Niagara County, leaving the community as a whole, but particularly those in the Eastern-end of the community, with reduced access to treatment close to home.

Current existing Part 818 Inpatient SUD program census (99 beds total), utilization, and bed availability data was reviewed. It was noted that official utilization rates appear lower during the COVID-19 pandemic. However, those rates are based on licensed capacity and do not account for programmatic decisions to limit number of beds filled for disease prevention. Information presented by Catholic Health itself at the April 5, 2022 planning meeting stated “that demand for inpatient treatment beds consistently exceeds available beds and ...pervasive, higher than optimum utilization of beds in the region”.

The CSB also noted that the facility where the proposed Recovery Center of Niagara is located was sold to the Recovery Center’s ownership group by the Eastern Niagara Health System and that Hospital administration was aware at the time of the sale of the new owner’s intention to open a Detox and Inpatient treatment program.

The CSB took a roll call vote at its meeting on May 16, 2022 on the Recovery Center of Niagara Application #CA 2021.077. The Board **UNANIMOUSLY recommended approval of the application**.

We are willing to provide further information to NYS OASAS and the BHSAC if needed and would be happy to have a representative from the Community Services Board (CSB) available to answer questions at the September 22, 2022 Advisory Council meeting.

Respectfully submitted,



Rosamond Siegwarth,
Board President