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May 29, 2026
VIA EMAIL AND U.S. MAIL

Mattie Dawson, Certificate of Need Program Manager
Certificate of Need Program
State of Alaska Department of Health
3601 C Street, Suite 978
Anchorage, AK 99508-5924

Re: Request for Expedited Determination Move licensed PRTF beds

Dear Ms. Dawson:

North Star Behavioral Health (NSBH) respectfully requests an expedited determination under 7 AAC 07.031 regarding whether a Certificate of Need (CON) is required for the relocation and program reconfiguration described below. Based on the scope and nature of the proposed changes, NSBH believes that no CON is required, as the modifications involve only the relocation and reassignment of existing licensed beds and programs, with no new construction, no increase in licensed bed capacity, and no capital expenditures approaching the \$1,500,000 threshold.

Our Psychiatric Residential Treatment Facility (PRTF) services are statewide programs, serving youth from communities across Alaska. From January 1st 2020 - June 30th 2025 of those who were admitted to Summit Residential 18% of patients resided within the Mat-Su Valley service area, 33% resided in the Anchorage service area and 49% were dispersed across the state of Alaska. As our proposal will consolidate and reposition existing statewide PRTF services within our current building footprint, we believe it falls outside CON requirements.

Description of Proposed Activity

NSBH proposes relocating existing licensed beds and adjust program locations across two existing buildings, without construction or capital expenditure:

1. Relocation of Summit Program (PRTF beds)
 - From: 3647 N Clark Wolverine Rd, Palmer, AK 99645
 - To: 1500 DeBarr Cir, Anchorage, AK 99508 (within the same building as existing PRTF program)
 - NSBH will coordinate with state licensing to consolidate the PRTF licenses into one license and expand wilderness-based treatment modalities at the Anchorage location under 7 AAC 50.625.
2. Relocation of Arctic Recovery (1115 Waiver Adult SUD services)
 - From: 1500 DeBarr Cir, Anchorage AK 99508
 - To: 1650 Bragaw St, Anchorage, AK 99508
3. Closure of the Chris Kyle Adult Inpatient Patriot Support Program due to sustained low census indicating lack of community need.
4. Closure of the Palmer facility at 3647 N Clark Wolverine Rd, Palmer, AK 99645

These adjustments involve no additional beds, no structural modifications, and no capital expenditures. All facilities involved already meet applicable regulatory requirements.

Regulatory Basis

Under 7 AAC 07.031, modifications to licensed facilities that do not involve: new construction, an increase in licensed bed capacity, or capital expenditures totaling \$1,500,000 or more may proceed without a full Certificate of Need review.

The proposed activities meet these criteria because they involve only the reassignment and relocation of existing licensed beds and programs within current building envelopes. No construction, expansion, or financial investment approaching the CON threshold is planned or required.

Bed Relocation Summary Table

Program	Current Location	Future Location	Level of care	Current Bed Count	Future Bed Count
Chris Kyle (Adult Inpatient Patriot Support Program)	1650 Bragaw St, Anchorage, AK 99508	Program closure	Acute	36	0
Arctic Recovery (1115 Waiver Adult SUD services)	1500 DeBarr Cir, Anchorage AK 99508	1650 Bragaw St, Anchorage, AK 99508	Acute	30	36
Main (Acute Children/Adolescent)	2530 DeBarr Cir, Anchorage AK 99508	2530 DeBarr Cir, Anchorage AK 99508	Acute	74	74
Summit Program (30 licensed PRTF beds)	3647 N Clark Wolverine Rd, Palmer, AK 99645	1500 DeBarr Cir, Anchorage AK 99508	PRTF	30	30
Alpine Program (30 licensed PRTF beds)	1500 DeBarr Cir, Anchorage AK 99508	1500 DeBarr Cir, Anchorage AK 99508	PRTF	30	30
				200 total beds	170 total beds

Rationale for the Proposed Changes

North Star is the largest provider of behavioral health services for youth in the state. We care for patients whose acuity supersedes the capability of others. The acuity we serve requires us to ensure that our physical spaces meet the needs of our youth. This reconfiguration is designed to optimize patient care, improve operational efficiency and enhance our PRTF care environment which in turn strengthens our capability to deliver statewide behavioral health services. This change will assist in keeping Alaska's youth in the State for residential treatment. Specifically:

- The Palmer facility's physical plant cannot support the needs of the increasingly high-acuity youth being referred to our PRTF programs. Without proper infrastructure to meet acuity needs, patients are left with no other in-state options leading to out-of-state placement. Consolidation in Anchorage provides access to a more appropriate environment of care and improved allocation of resources.
- Relocating Summit into the Anchorage campus allows NSBH to expand wilderness-based programming to both Alpine and Summit in alignment with 7 AAC 50.625, improving treatment quality and outcomes for youth across Alaska.
- Closing the Chris Kyle program is a necessary step given consistently low demand and allows NSBH to repurpose existing infrastructure to utilize physical space to meet community needs.
- The realignment maintains all existing statewide service capacity for youth and expands access for Alaska residents by ensuring that beds are located where the patient acuity and staffing resources best align.

Overall, this proposal allows NSBH to more effectively use existing licensed beds, maintain statewide service availability for youth, and improve care quality without requiring any new construction or expenditure.

Cost Estimate

No new construction, renovation, major equipment purchase, or other capital expense is associated with this proposal. Costs are limited to routine operational adjustments.

Implementation Timeline

NSBH seeks approval for immediate implementation upon receipt of a determination. An expedited response will enable seamless continuity of care, timely relocation of services, and prompt coordination with state licensing for program transitions and program closure requirements.

Thank you for your prompt consideration of this request. We are available to provide any additional information, documentation, or clarification needed to support your review.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tim Stephens', with a long horizontal line extending to the right.

Tim Stephens
Chief Executive Officer
North Star Behavioral Health

