



Alicia J. Novi. Esq.
Hearing Officer
Office of Health Strategy
450 Capitol Avenue
Hartford, CT 06410

Re: Docket No. 24-32709-CON

October 8, 2024

Dear Hearing Officer Novi:

The purpose of this letter is to provide public comment to express opposition to a Certificate of Need (CON) application by SISU Integrated Health, LLC ("Applicant") to establish a new day treatment and outpatient behavioral health facility for adults in Westport.

As Executive Director of Connecticut Center for Recovery, I have been asked by Chris Livolsi, CEO to elaborate on his letter that appears in the record as Exhibit D - Letter of Opposition (Chris Livolsi), dated June 21, 2024 (uploaded to OHS Portal June 26, 2024). In his letter, Mr. Livolsi outlined serious concerns about the application including:

- Lack of need for the proposed new facility;
- The potential deleterious financial impact it would have on our organization and likely several others in the area;
- Duplication of services as the southwestern Fairfield County area has become filled – especially in Westport - with similar programs such as is proposed by the Applicant;
- Lack of coordination with area providers and planning organizations; and
- The apparent lack of actual experience in the behavioral healthcare business by the Applicant, especially Mr. Reginald Silva.

The Connecticut Center for Recovery (CCR) is a licensed outpatient behavioral health facility in Greenwich that has been providing day treatment and intensive outpatient treatment for adults mostly from lower Fairfield County since 2019. We have been meeting the needs of clients from

Westport and other nearby towns within Applicant's proposed target service area for the past five (5) years. We find that the actual demand for services here has leveled off and that the existence of several similar outpatient behavioral health facilities in the area appears to be meeting local needs for intensive outpatient services.

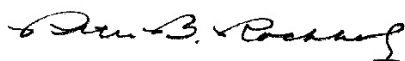
On behalf of CCR and other of the area providers, we did a brief background search on the Applicant's chief executive, Reginald Silva. We were surprised to learn that some of the representations he made in his CON application and Pre-Filed Testimony appear to be at odds with the truth. For example, we had direct contact with the Owner/Operator of Greater Boston Addiction Center (GBAC), Mr. Ryan Caulfield, who indicated that the dates Mr. Silva submitted on his resume as having worked at GBAC were inaccurate. He was willing to share this (with his attorney's approval) in the attached letter that we submit with Mr. Caulfield's full approval.

It appears that Mr. Silva only worked at GBAC in a mid-level position for less than two months and was terminated for cause. In his Pre-Filed Testimony, Mr. Silva states "Over the years I had the privilege of working in the field of behavioral health and substance use treatment at the executive level, ..." yet his resume fails to support this including not having true related executive experience at all.

Further, Mr. Silva represents himself as a "professional in the field of mental health and addiction treatment". In our understanding of this terminology, without college education in the human services field, licensure or certification, clinical experience and/or training, one should not refer to themselves as such. We have obvious concerns that we hope OHS shares, and that DPH certainly will.

The provider network in Connecticut, and Fairfield County in particular, is a very close, collaborative, and supportive collection of high quality, experienced behavioral health professional organizations and individuals. We share resources and act much like a family and community. We care about the integrity and quality of services in our community and are protective of the reputation we all share and contribute to. We are insistent that new providers not only fill a true need or gap in services but demonstrate a high level of competence and integrity. What we see in the applicant's proposal falls well short on several levels to meet these expectations.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter B. Rockholz". The signature is fluid and cursive, with a large, stylized initial 'P'.

Peter B. Rockholz, M.S.S.W., LCSW
Executive Director



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To Whom It May Concern,

Reginald Silva was employed at Greater Boston Addiction Centers from August 14th 2023 until October 11th 2023 for a period of 1 month and 27 days at an assistant operator level.

Reginald was terminated for cause when misuse of company funds was discovered in relation to SISU Clinical Wellness business account. He was immediately terminated and any relationship between Reginald, SISU, and Greater Boston Addiction Centers was ceased.

Ryan F Caulfield
Owner/Operator Greater Boston Addiction Centers

MOVE FORWARD