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STATE HEALTH PLANNING
AND DEVELOPMENT AGENCY

HKH

HARBUCK KEITH & HOLMES
LLC

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November 29, 2016

Via Electronic Mail – shpda.online@shpda.alabama.gov

Mr. Alva M. Lambert
Executive Director
State Health Planning and Development Agency
100 North Union Street, Suite 870
Montgomery, Alabama 36104

Dear Mr. Lambert:

We represent St. Vincent's East, a 362-bed hospital located in Jefferson County, Alabama. The purpose of this letter is to request a determination, pursuant to the Alabama Certificate of Need Program Rules and Regulations ("Regulations") § 410-1-7-.02, that the proposed establishment by St. Vincent's East of a diagnostic center in Trussville, Alabama is not subject to Certificate of Need review ("CON review") under Ala. Code 1975, §22-21-260 et seq. and the Regulations. Our request is based upon the following facts.

The proposed St. Vincent's East diagnostic center will be located in a professional office building to be constructed by an unrelated third-party developer owned by MBRE Healthcare ("MBRE") out of Chicago, Illinois in the 7100 block of Happy Hollow Road, Trussville, Alabama 35173. MBRE will lease a portion of the building to St. Vincent's East pursuant to an operating lease for use as a diagnostic center.

St. Vincent's East currently provides a full array of diagnostic services on its main campus. The proposed diagnostic center will provide diagnostic services currently being provided by St. Vincent's East on its main campus, including without limitation CT and MRI services. No other health care facility or group has a financial interest in the development of the proposed diagnostic center. St. Vincent's East will not add any new beds, provide any new health services, convert any beds from one classification to another classification, or make any expenditures in excess of the applicable spending thresholds under Ala. Code § 22-21-263(a)(2) and § 410-1-4-.01(1)(b) of the Regulations in connection with the establishment of the proposed diagnostic center. Specifically, St. Vincent's East anticipates the cost to establish the diagnostic center to be as follows:

Capital Costs/Construction -	\$0
Annual Rent -	\$285,720
Major Medical Equipment -	\$2,324,091
First Year Annual Operating -	\$824,715

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Accordingly, based on the above information, we respectfully request your determination that St. Vincent's East's establishment of a diagnostic center in Trussville, Alabama is not subject to CON review under Ala. Code 1975, §§22-21-260 et seq. and the Regulations. St. Vincent's East is sending by overnight delivery a check in the amount of \$1,000.00 in payment of the fee for this request. Set forth below is the Affirmation of Requesting Party required by § 410-1-7-.02 of the Regulations.

Please feel free to contact me if you need any additional information.

Respectfully submitted,



David M. Hunt

Affirmation of Requesting Party:

The undersigned, being first duly sworn, hereby makes oath or affirms that she is the Chief Strategy Officer of St. Vincent's Health System, the parent corporation of St. Vincent's East, that she has knowledge of the facts in this request, and to the best of her information, knowledge and belief, such facts are true and correct.

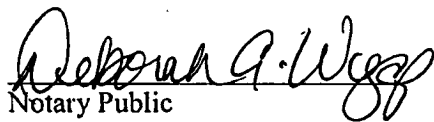
St. Vincent's Health System

By 

Nan Priest

Its: Chief Strategy Officer

SUBSCRIBED AND SWORN to before me this 29th day of November, 2016.


Notary Public

My commission expires: _____

MY COMMISSION EXPIRES:
March 20, 2018