

Jennifer Clark

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January 10, 2019

RECEIVED

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STATE HEALTH PLANNING AND
DEVELOPMENT AGENCY

Via Electronic Filing
(shpda.online@shpda.alabama.gov)

Mr. Bradford L. Williams
Acting Executive Director
State Health Planning and Development Agency
100 North Union Street, Suite 870
Montgomery, AL 36104

RE: Request for Reviewability Determination
Affinity Hospital, LLC d/b/a Grandview Medical Center

Dear Mr. Williams:

Our firm represents Affinity Hospital, LLC d/b/a Grandview Medical Center ("Grandview"), which operates Grandview Medical Center, a 372-bed tertiary care hospital located in Jefferson County, in the city of Birmingham. The purpose of this letter is to request your determination, pursuant to rule 401-1-7-.02 of the Alabama Certificate of Need Program Rules & Regulations ("CON Rules"), that Grandview does not require a Certificate of Need ("CON") from the State Health Planning and Development Agency to pursue the renovation described in this letter. In order to assist with this determination, we offer the following information.

Grandview Medical Center offers a multitude of services, including many types of procedures that fall under category of Women's Health. To better serve its Women's Health patients, Grandview intends to renovate a portion of the third floor, where Women's Health procedural services are principally provided. Though many Women's Health patients receive all their care on the third floor, other patients who require certain procedures must register and receive services outside the centralized area in which Women's Health services are principally offered. The goal of this proposed renovation is to create a centralized, connected environment that, in turn, will benefit both patients and clinicians.

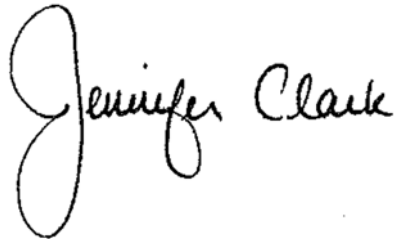
The proposed renovation will not exceed any of the CON expenditure thresholds set forth in Section 410-1-2-.07 of the CON Rules, which effective October 1, 2018 are \$2,997,918 for major medical equipment, \$1,199,166 for new annual operating cost, and \$5,995,836 for other capital expenditures. Grandview estimates that this renovation will involve the following costs:

Construction Costs:	\$3,691,949
New Annual Operating Costs:	\$882,660
Major Medical Equipment:	\$2,108,052

This relocation of procedural services for Women's Health patients will result in neither an increase in the number of licensed inpatient beds nor a reclassification of beds. Further, the renovation will not result in the implementation of a new institutional health service.

For these reasons, the proposed renovation is not subject to CON review. *See* Ala. Code 1975, § 22-21-263; CON Rules 410-1-2-.07. We therefore respectfully request your determination that Grandview is not required to obtain a CON in order to undertake the renovation described in this letter. We appreciate your consideration of this request, and we welcome the opportunity to address any questions regarding this matter. A check for \$1,000.00 in payment for the applicable fee will be delivered to your office. Thank you very much.

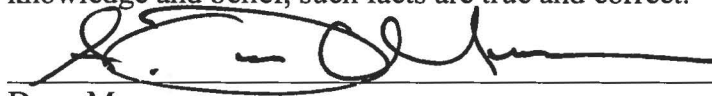
With Best Regards,

A handwritten signature in black ink that reads "Jennifer Clark". The signature is written in a cursive style with a large, looped initial "J".

Jennifer Clark

Affirmation of Requesting Party:

The undersigned, being first duly sworn, hereby makes oath or affirms that he, as Chief Executive Officer of Affinity Hospital, LLC d/b/a Grandview Medical Center, has knowledge of the facts in the attached Request for Reviewability Determination, and to the best of his information, knowledge and belief, such facts are true and correct.

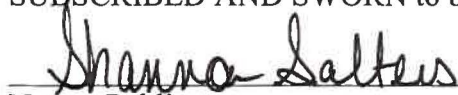


Drew Mason

Chief Executive Officer of Affinity Hospital, LLC d/b/a Grandview Medical Center

(SEAL)

SUBSCRIBED AND SWORN to before me this 10th day of January, 2019.



Notary Public

My commission expires: March 1, 2019

