

May 29 2019

STATE HEALTH PLANNING AND
DEVELOPMENT AGENCY

*Huntsville
Cardiovascular
Clinic, P.C.*

4601 Whitesburg Drive • Suite 201 • Huntsville, Alabama 35802 • Phone: (256) 880-1050 • Fax: (256) 880-7477

May 29, 2019

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State Health and Planning Development Agency
100 North Union Street
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Montgomery, AL 36130-3025

RE: Non-Reviewability Determination Request for Huntsville Cardiovascular Clinic, P.C.

Dear Ms. Norman:

On behalf of Huntsville Cardiovascular Clinic, P.C., I am writing to submit a reviewability request in accordance with the Alabama State Health Planning and Development Agency's Certificate of Need (CON) program rules and regulations (410-1-7-.02).

Huntsville Cardiovascular Clinic, P.C. (HCC) would like to request non-reviewability to include Cardiac PET scanning services.

These Cardiac PET scans would be in addition to Cardiac SPECT scans currently performed in our facility. By offering this more advanced testing option, we are confident we will be able to:

- 1) Reduce radiation exposure;
- 2) increase accuracy for patients with higher BMIs (Body Mass Index);
- 3) more accurately predict medical necessity for further procedures;
- 4) eliminate unnecessary procedures or services;
- 5) and increase patient satisfaction and positive outcomes.

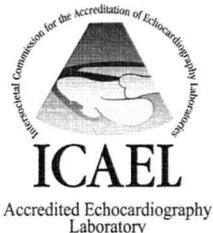
The criteria as adopted by the Supreme Court for the Physician Office Exemption are as follows:

- 1) The proposed services are to be provided, and related equipment used, exclusively by the physicians identified as owners or employee of the physician's practice for the care of their patients.
- 2) The proposed services are to be provided, and related equipment used, at any office of such physicians.
- 3) All patient billing related to such services are through, or expressly on behalf of, the physicians' practice.
- 4) The equipment shall not be used for inpatient care, nor by, through or on behalf of a health-care facility.

Huntsville Cardiovascular Clinic will, through the performance of the tests previously reviewed, meet the above criteria respectively as follows:

- 1) Tests will be performed only by physician owners or by physician employees of HCC.
- 2) All tests will be performed in the office of HCC, currently located at 4601 Whitesburg Dr., Suite 201, Huntsville, AL 35802. All equipment necessary for the performance of the above test will be used only in the office of HCC.
- 3) All patient billing for the tests performed will be done on behalf of HCC.
- 4) At no time will the equipment used for the performance of our office-based test be used for inpatient care, nor by, through or on behalf of any other healthcare facility.

INTERNATIONAL BOARD OF
HEART RHYTHM
EXAMINERS
PHYSICIAN
CERTIFIED CARDIAC
DEVICE SPECIALIST



Financial Breakdown

- 1) Start-Up Cost: Total = \$480,000
 - a. Cardiac PET system (all other necessary equipment is already owned) - \$375,000
 - b. Infusion system shipping and setup - \$5,000
 - c. Renovation cost - \$100,000

- 2) Estimated Annual Operating Costs: Total = \$856,254
 - a. Equipment Maintenance - \$75,000
 - b. CardioGen-82 Generator - \$553,254
 - c. Infusion System Service Agreement - \$24,000
 - d. Wages - \$120,000
 - e. Equipment Loan Payment - \$84,000

* Please note that the space needed for the PET system is within our current office so there will be no increase in cost related to space.