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Rural
RECEIVED

Aug 24 2020

STATE HEALTH PLANNING AND
DEVELOPMENT AGENCY

August 24, 2020

VIA ELECTRONIC FILING

Hon. Emily Marsal
Executive Director
State Health Planning & Development Agency
100 North Union St., Suite 870
Montgomery AL 36104

Re: Request for Reviewability Determination
Cullman Regional Medical Center

Dear Ms. Marsal:

Our firm represents Cullman Regional Medical Center, an acute care hospital located at 1912 Alabama Highway 157, Cullman, Alabama 35058 ("CRMC"). CRMC is located in Cullman County which is a Micropolitan Statistical Area and satisfies the statutory exemption found in Section 22-21-263(a)(4) of the Code of Alabama (1975) with respect to acute care hospitals classified as rural by the Office of Management and Budget. CRMC is a sole community hospital and is the only acute care hospital in Cullman County.

The purpose of this letter is to request your determination, pursuant to Section 410-1-7-.02 of the Alabama Certificate of Need Program Rules & Regulations ("Regulations"), that the re-opening of a second catheterization lab (which will also be classified as a multi-purpose room) at CRMC for vascular surgery and for diagnostic and interventional cardiac catheterizations on CRMC's campus does not require CRMC to obtain a Certificate of Need ("CON") from the State Health Planning and Development Agency.

The scope of the proposed project will not exceed any of the CON expenditure thresholds specified in Section 410-1-2-.07 of the Regulations, of \$3,024,899 for major medical equipment, of \$1,209,958 for new annual operating costs, or of \$6,049,799 for capital expenditures, as currently adjusted for CPI. CRMC represents that the proposed project will not exceed the following approximate costs:

| | |
|--|--------------|
| Total Renovation/Construction Cost: | \$ 200,000 |
| Total Equipment Cost: | \$ 1,500,000 |
| Total Incremental Annual Operating Cost: | \$ 1,200,000 |

As a point of reference, CRMC's existing catheterization lab has performed over 1,000 procedures in the twelve month period ending July 31, 2020 as calculated in accordance with

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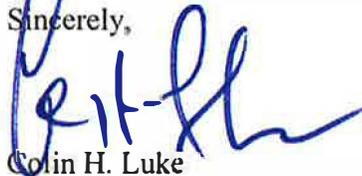
410-2-3-.03 of the Regulations. Furthermore, CRMC is the only facility that provides catheterization services in Cullman County.

This project will not involve the addition of inpatient beds or the conversion of one classification of beds into another classification of beds. Further, this project will not result in the provision of any new institutional health services.

It is our understanding that as a rural hospital, CRMC is not required to pay a filing fee in connection with this request for a letter of non-reviewability.

Accordingly, based on the above, we respectfully request your determination that CRMC is not required to obtain a CON in order to complete the proposed project. We appreciate your consideration of this request. Feel free to contact me if you need further information or have any questions.

Sincerely,



Colin H. Luke

The undersigned, being first duly sworn, hereby makes oath or affirms that she is the Chief Operating Officer for Cullman Regional Medical Center, has knowledge of the facts in this request, and to the best of her information, knowledge and belief, such facts are true and correct.

Affiant: 
Neshia Donaldson

SUBSCRIBED AND SWORN to before me this 24th day of August, 2020.



(SEAL)

My commission expires
Notary Public

