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2023-003R  
**RECEIVED**  
**Oct 26 2022**  
STATE HEALTH PLANNING AND  
DEVELOPMENT AGENCY

CHRISTOPHER L. RICHARD  
DIRECT DIAL: (334) 409-2233  
EMAIL: CRICHARD@GILPINGIVHAN.COM

October 26, 2022

**SENT THIS DATE VIA EMAIL TO: [shpda.online@shpda.alabama.gov](mailto:shpda.online@shpda.alabama.gov);  
[Emily.Marsal@shpda.alabama.gov](mailto:Emily.Marsal@shpda.alabama.gov)**

Ms. Emily T. Marsal, Esquire  
Executive Director  
Alabama State Health Planning and Development Agency  
RSA Union Building  
100 North Union Street, Suite 870  
Montgomery, Alabama 36104

*Re:* Geneva County Health Care Authority, Inc. d/b/a Wiregrass Medical Center and  
d/b/a Samson Rural Health Clinic  
Our File No. 4630.1046

Dear Ms. Marsal:

Our firm represents Geneva County Health Care Authority, Inc., an Alabama health care authority (the "Authority"). The Authority owns and operates Wiregrass Medical Center (the "Hospital") and Wiregrass Nursing Home in Geneva, Geneva County, Alabama. The Authority also owns and operates a primary care clinic (the "Clinic") in Samson, Alabama (also located within Geneva County) which it desires to certify as a Rural Health Clinic ("RHC") under the Medicare program. With this letter, we request, on behalf of the Authority, written confirmation that the Clinic is not subject to Certificate of Need review prior to being certified as an RHC. The following information is provided to assist in evaluating this request:

1. **Name of applicant:** Geneva County Health Care Authority, Inc., d/b/a Wiregrass Medical Center and d/b/a Samson Rural Health Clinic.
2. **Address and contact information:**  
Janet E. Smith, CEO  
Phone Number: (334) 684-3655  
Email: [janet.smith@wiregrassmedicalcenter.org](mailto:janet.smith@wiregrassmedicalcenter.org)  
Geneva County Health Care Authority, Inc.  
d/b/a Wiregrass Medical Center  
1200 W Maple Avenue  
Geneva, Alabama 36340  
and

Ms. Emily T. Marsal, Esquire  
Executive Director  
Alabama State Health Planning and Development Agency  
October 26, 2022  
Page 2

d/b/a Samson Rural Health Clinic  
98 E Morris Street  
Samson, Alabama 36477

3. **Service area:** Geneva County, Alabama; Holmes County, Florida.
4. **Services to be provided:** Outpatient health services, including primary care, physician, nurse practitioner, and rural health clinic services, as defined at 42 C.F.R. § 491.9 (“The clinic or center staff furnishes those diagnostic and therapeutic services and supplies *that are commonly furnished in a physician's office or at the entry point into the health care delivery system.* These include medical history, physical examination, assessment of health status, and treatment for a variety of medical conditions.”).
5. **Financial breakdown:**
  - a. **Equipment and Furniture:** \$0 (none new)
  - b. **First year new annual operating costs:** \$564,000.00
  - c. **Capital Costs:** \$ 49,500.00
    - i. **Leases:** \$ 49,500.00
    - ii. **Land/building costs:** \$ 0
    - iii. **Construction costs:** \$ 0
6. **Financial Interests:** Geneva County Health Care Authority, Inc. is the sole owner and operator of Samson Rural Health Clinic. No other health care facility, group, or entity has a financial interest in Samson Rural Health Clinic.

As of September 23, 2022, the Certificate of Need thresholds pursuant to Ala. Code § 22-21-263 are \$3,241,543.00 for major medical equipment, \$1,296,615.00 for new annual operating costs, and \$6,483,085.00 for any other capital expenditures. All of the projected expenditure amounts for this project are well below these thresholds. In addition, both the Hospital and the Clinic are located in areas designated as “rural” for purposes of 42 C.F.R. § 491.5, pertaining to certification of RHCs (*i.e.*, they are not located in areas delineated as “urbanized areas” in the last census conducted by the United States Census Bureau). The enclosed map from the United States Census Bureau’s TIGERweb service reflects that Geneva is in an urban cluster, but neither Geneva nor Samson is located in an “urbanized area”. In addition, as outlined above, the Clinic will continue to operate largely as a physician office following its certification as an RHC.

GILPIN GIVHAN

Ms. Emily T. Marsal, Esquire  
Executive Director  
Alabama State Health Planning and Development Agency  
October 26, 2022  
Page 3

The Authority, as applicant, primarily operates Wiregrass Medical Center, a rural hospital. As such, pursuant to Ala. Admin. Code Rule 410-1-7-.02(7), no application fee is tendered with this request for a reviewability determination. Should you determine that an application fee is required, please contact me at your earliest convenience.

Thank you for your consideration of this request. If you have any questions or require additional information to process this request, please do not hesitate to contact me.

Very truly yours,

GILPIN GIVHAN, PC



Christopher L. Richard

CLR/caw  
Enclosure

cc: Janet E. Smith, CEO of Geneva County Health Care Authority, Inc.

Ms. Emily T. Marsal, Esquire  
Executive Director  
Alabama State Health Planning and Development Agency  
October 11, 2022  
Page 4

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**AFFIRMATION OF REQUESTING PARTY**

The undersigned, **Janet E. Smith**, being first duly sworn, hereby makes oath or affirms that she is **CEO of Geneva County Health Care Authority d/b/a Wiregrass Medical Center and d/b/a Samson Rural Health Clinic**; 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**

  
\_\_\_\_\_  
**Janet E. Smith**

SUBSCRIBED AND SWORN to before me this 11 day of October, 2022.

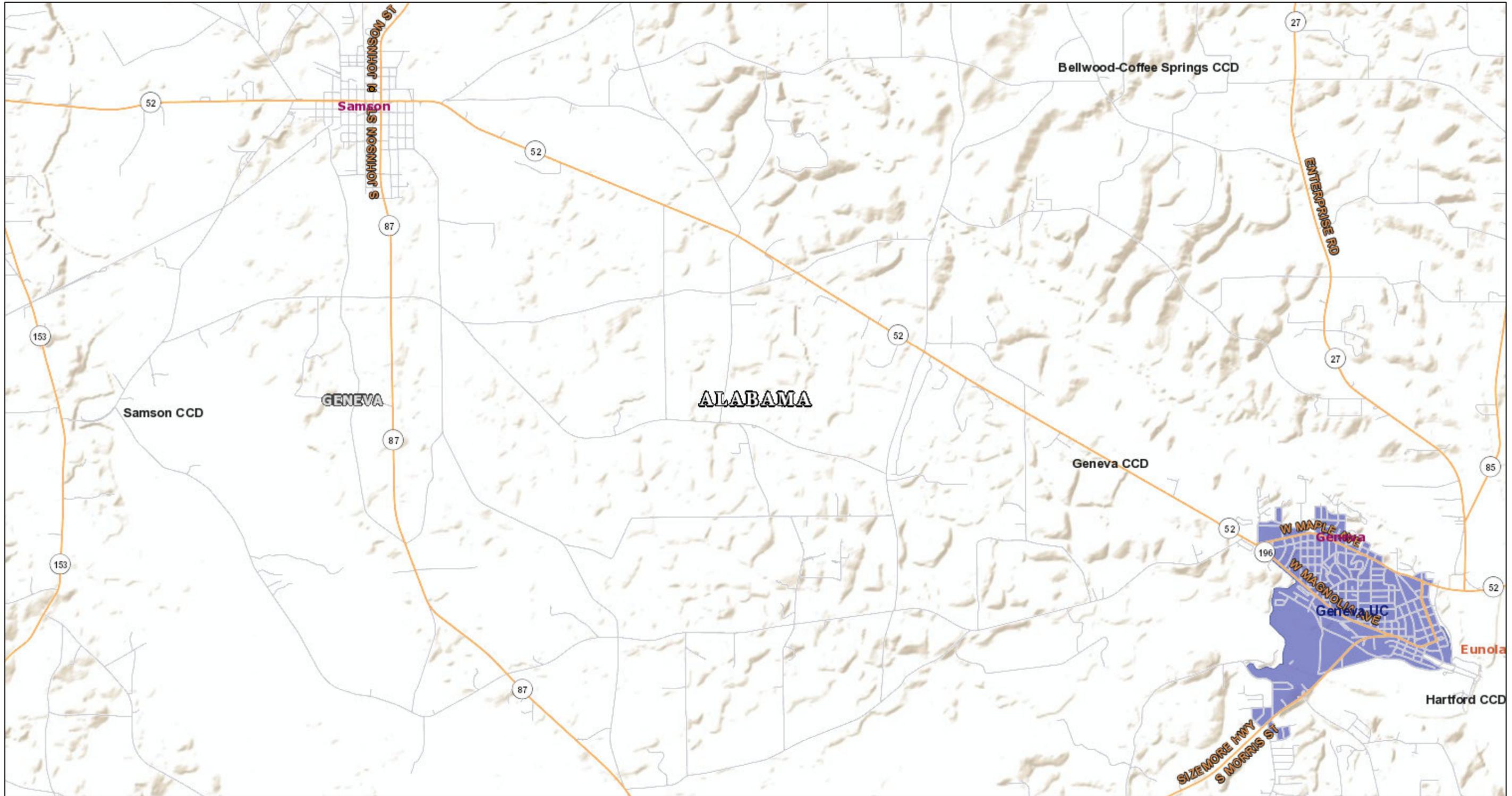
[SEAL]

  
\_\_\_\_\_  
Notary Public  
My Commission Expires: 2/20/2023

**ENCLOSURE**

**United States Census Bureau TIGERweb Map**

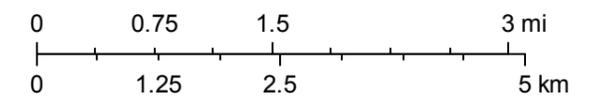
# Samson and Geneva



November 20, 2020

1:72,224

- |                          |                 |
|--------------------------|-----------------|
| County Subdivisions      | States          |
| Consolidated Cities      | Counties        |
| Incorporated Places      | Urbanized Areas |
| Census Designated Places | Urban Clusters  |
| Urbanized Areas          | States          |
| Urban Clusters           | Counties        |



Source: U.S. Census Bureau  
Sources: Esri, USGS, NOAA