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May 22 2023
STATE HEALTH PLANNING AND DEVELOPMENT AGENCY

All Talk, LLC dba The SpOT Clinic 901 Commerce Drive, Suite 1A Gulf Shores, AL 36542

May 17, 2023

State Health Planning and Development Agency Attention: Reviewability Determination Request 100 North Union Street, Suite 870 Montgomery, Alabama 36104

VIA EMAIL TO: shpda.online@shpda.alabama.gov (Original will not follow unless requested)

Dear Sir/Madam,

Please consider this letter and supporting documentation as a request for initial reviewability determination pursuant to SHPDA Rule 410-1-1.02. All Talk, LLC was under the belief (and still maintains) that this was not a requirement for pediatric habilitation clinics. However, in an attempt to address this, we are filing this initial letter based on the recommendation of Kristin Norman from the State Health Planning and Development Agency.

We have reviewed other clinics in Alabama who provide the services we provide and have found close to 100 others that are not in compliance with a CON or ADPH licensure if this is in fact required for clinics such as ours. Regardless, I apologize for the delay in filing this and want to do anything to expedite the process so as to ensure that the children we serve are not deprived of services which could ultimately cause reduced progress and difficulty adjusting to a new facility. I appreciate your understanding and assistance in this matter.

I am including the information listed on the "Factual Information Required for Reviewability Determination Requests (SHPDA Rule 410-1-1-.02).

 Name of company seeking the reviewability determination: All Talk, LLC dba The SpOT Clinic



2. Address and contact information for the authorized company representative seeking the determination: Tracy Bond, MA, CCC-SLP/Owner, 331 Creekwood Drive, Union Grove, AL 35175. Cell phone (256) 345-0245.

Clinic location in Baldwin County, AL is:

All Talk, LLC dba The SpOT Clinic 901 Commerce Drive, Suite 1A Gulf Shores, AL 36542

- 3. Service area for the proposed service: Baldwin County, AL
- 4. Any new services to be provided under the proposed project: pediatric speech, physical, occupational habilitative therapy
- 5. Approximated costs of the proposed project in Gulf Shores location: 2023
  - a. Equipment potential additional equipment \$5000.00
  - b. First year annual operating costs 1,100,000.00
  - c. Capital costs for the Gulf Shores clinic, to include:
    - i. Leases \$3250.00 per month
    - ii. Land/Building costs \$500.00
    - iii. Construction costs \$1,000.00
- 6. Disclosure of financial interests in the entity requesting the reviewability determination head by any other healthcare facilities or groups: All Talk, LLC dba The SpOT Clinic is a single member Alabama Limited Liability Company and I am its sole member. There are no other healthcare facilities or group affiliated with All Talk, LLC dba The SpOT Clinic.
- 7. Attesting by an officer, partner, or authorized agent of the company having knowledge of the facts disclosed in the reviewability request see below.
- 8. Review of habilitative services provided: We typically see ages 0-16, but in the past have seen up to the 21st birthday. Pediatrics is from 0 21 years of age. We have never, nor



will we ever, see any children over 21. Our facility is not set up for adults. This is why we are now limiting to ages 0 - 16. We are allowed to treat and bill for those disorders and diagnoses that are habilitative only. We provide habilitative services to those children that have never had a skill or need to receive therapy to maintain function such as autism, articulation, language, stuttering, expressive and receptive language, handwriting, those who have never had normal gross motor and need therapy to be able to be more mobile (cerebral palsy, torticollis, Down's syndrome, etc.), fine motor skills that have never developed (scissor skills, skills to prepare for coloring and writing), sensory problems that do not allow children to dress appropriately at school or home, don't allow them to be able to sit in a desk or function in a classroom, can't handle lights or noises that makes them unable to function in society, etc.).

9. How habilitative services differ from rehabilitative (we do not provide rehabilitative services) services: We are allowed to treat and bill for those disorders and diagnoses that are habilitative only. We cannot bill for any disorder or diagnosis that is rehabilitative (those who had normal functioning and need therapy for rebuilding previous function due to an illness or accident - for example: stroke, multiple sclerosis, Parkinson's, head injuries, etc.). We treat those children that have never had a skill or need to receive therapy to maintain function (autism, articulation, language, stuttering, expressive and receptive language, handwriting, those who have never had normal gross motor and need therapy to be able to be more mobile (cerebral palsy, torticollis, Down's syndrome, etc.), fine motor skills that have never developed (scissor skills, skills to prepare for coloring and writing), sensory problems that do not allow children to dress appropriately at school or home, don't allow them to be able to sit in a desk or function in a classroom, can't handle lights or noises that makes them unable to function in society, etc.).

Thank you again for your assistance and guidance in completing this process. Please contact me if any further information is required.

Sincerely,

Tracy Bond, MA, CCC-SLP CEO/Owner – All Talk, LLC dba The SpOT Clinic mstracy@thespotclinic.com (256) 345-0245



Enclosure: Factual Information Required for Reviewability Determination Requests (SHPDA Rule 410-1-1-.02).

## Affirmation of Requesting Party:

The undersigned, being first duly sworn, hereby make oath or affirm that she is CEO and Member of All Talk, LLC dba The SpOT Clinic and has knowledge of the facts in this request, and to the best of her information, knowledge and belief, such facts are true and correct.

Tracy Bond, Affiant

SUBSCRIBED AND SWORN to before me this 22 day of May, 2023.

My commission expires: 2-10-25