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RV2022-008
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Nov 05 2021

STATE HEALTH PLANNING AND
DEVELOPMENT AGENCY

November 3, 2021

VIA ELECTRONIC FILING

Hon. Emily Marsal
Executive Director
State Health Planning & Development Agency
100 North Union St., Suite 870
Montgomery AL 36104
Shpda.online@shpda.alabama.gov

Re: Request for Reviewability Determination
USA Health Children's & Women's Hospital

Dear Ms. Marsal:

Our firm represents USA Health Children's & Women's Hospital (the "CWH") which operates a freestanding specialty children's and women's acute care hospital in Mobile, Alabama, and is a regional referral center component division of USA Health serving Mobile and Baldwin Counties, Alabama; South Central Mississippi; and Northwest Florida.

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 CWH is not required to obtain a Certificate of Need ("CON") from the State Health Planning and Development Agency to convert four general medical surgical acute care beds to ICU beds for adult women OB/GYN patients and complete the associated renovations to existing space for such purpose on the 3rd floor of CWH.

This project will allow CWH to provide a higher level of care to its adult women OB/GYN patients than is currently available at the hospital through its women's complex care unit, where post-surgical care is currently provided for its adult women patients. Approximately eight adult women patients per month must be transferred to USA Health University Hospital for a higher level of care, and converting the requested four beds to adult women OB/GYN ICU beds will allow CWH to provide the necessary care for these patients in-house, without the need to transfer to another facility. These patients typically fall into two categories: (1) obstetric patients that are critical before/after delivery or (2) GYN patients that are critical following surgery. Obstetric patients can be considered critical and in need of a higher level of care for several reasons such as preeclampsia, postpartum hemorrhage, pulmonary embolism or COVID-19.

The project will expand four rooms in size to accommodate a ventilator, multiple IVs, a fetal monitoring system as well as glass walls and doors for enhanced visibility. The project will

Hon. Emily Marsal

Page 2

also relocate the nurses station to be more centrally located and create sight lines to patients which is critical for an ICU

The renovated 4-bed ICU unit will allow for continuity of care for women OB/GYN patients in one hospital facility. Support areas within the unit will be designed to provide for the needs of a higher level acuity unit like the proposed ICU, and CWH's patients in need of such care will be able to avoid a hospital transfer to an already busy ICU as exists at USA Health University Hospital. The proposal will also further promote quality of care and recovery in a specialized care setting away from the other patient types residing in a typical general acute hospital ICU like University Hospital, including, most recently, a large number of COVID-19 patients. These renovations to CWH, as the region's only specialized children's and women's teaching facility, will go a long way in supporting the patients served and furthering both comprehensive high quality care to its particular patient population as well as the teaching mission of the institution.

This project will not exceed any of the CON expenditure thresholds specified in Section 410-1-2-.07 of the Regulations: of \$3,165,569 for major medical equipment, of \$1,266,226 for new annual operating costs, or of \$6,331,138 for total capital expenditures, as currently adjusted for CPI. CWH represents that the proposed project will not exceed the following approximate costs:

| | |
|--|----------------|
| Total Relocation/Construction Cost: | \$1,000,000.00 |
| Total Equipment Cost: | \$ 500,000.00 |
| Total Incremental Annual Operating Cost: | \$1,100,000.00 |

This change will not involve the addition of inpatient beds or the conversion of one classification of beds into another classification of beds as described in SHPDA Rule 410-1-4-.01. Further, this change will not result in the provision of any new institutional health services.

In accordance with SHPDA Rule 410-1-7-.02, the filing fee of \$1,000.00 for this Letter of Non-Reviewability has been paid via the SHPDA electronic payment portal.

Accordingly, based on the above, we respectfully request your determination that CWH is not required to obtain a CON in order to convert four general acute beds into adult OB/GYN women ICU beds and complete the associated renovations for the new ICU unit. We appreciate your consideration of this request. Feel free to contact me (contact information above) or Christopher Jett at (251) 415-1601 or USA Health Children's & Women's Hospital, 1700 Center Street, Mobile, AL 36604, Attn: Chris Jett, if you need further information or have any questions.

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Hon. Emily Marsal
Page 3

Sincerely,


Kristen A. Larremore

cc: Christopher Jett, CWH Administrator

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Hon. Emily Marsal
Page 4

The undersigned, being first duly sworn, hereby makes oath or affirms that he is the Administrator for USA Health Children's & Women's Hospital, has knowledge of the facts in this request, and to the best of his information, knowledge and belief, such facts are true and correct.

Affiant: *C. Jett*
Christopher Jett

SUBSCRIBED AND SWORN to before me Nov. 4th, 2021.

Beverly S. Croley
Notary Public
My commission expires:



(SEAL)