



PRESTON
STRATEGY
GROUP

RV2025-028

RECEIVED

Feb 21 2025

STATE HEALTH PLANNING AND
DEVELOPMENT AGENCY

FILED: shpda.online@shpda.alabama.gov

February 21, 2025

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

RE: Reviewability Determination Request
Physician Office Exemption
IMC-Diagnostic and Medical Clinic

Dear Ms. Marsal:

IMC-Diagnostic and Medical Clinic (DMC) is one of the largest private multi-specialty clinic in Alabama and has been providing quality healthcare to the many communities it serves for over 70 years. DMC has eight (8) clinic locations throughout Mobile, Baldwin, Monroe, and Clarke counties in Southwest Alabama. DMC proposes to lease office space in a Professional Office Building (POB) to be located on the Infirmary Health Malbis Campus in the City of Daphne, Baldwin County, Alabama (specific address yet to be determined). DMC plans to provide external beam radiation treatments by purchasing and operating a linear accelerator. The linear accelerator will not be owned by or located in a health care facility, but instead will be owned and operated by an Alabama physician office which is exempt from Certificate of Need (CON) review under the physician office exemption.

In accordance with Section **410-1-7-.02 Reviewability Determination Request**, of the CON Program Rules and Regulations, DMC requests a determination of non-reviewability with respect to the development and operation of a linear accelerator in their physician office to be located in a POB on the Infirmary Health Malbis Campus. The proposed project does not involve the establishment of a "health care facility" nor does it involve offering a "health service".

In accordance with CON Rules and Regulations **Chapter 410-1-2 Definitions**:

410-1-2-.05 Health Care Facility

- (2) The term "health care facility" shall not include any of the following:



- (a) The private office of any duly licensed physician, dentist, chiropractor, or podiatrist, whether for individual or group practice and regardless of ownership.

410-1-2-.06 Health Services

Clinically related (i.e., diagnostic, curative or rehabilitative) services, including alcohol, drug abuse and mental health services customarily furnished on either an inpatient or outpatient basis by health care facilities, but not including the lawful practice of any profession or vocation conducted independently of a health care facility and in accordance with applicable licensing laws of this State.

DMC is a limited liability corporation organized under Infirmary Medical Clinics, PC. No health care facilities are owners or members of the LLC. The linear accelerator will be used solely by the DMC private medical practice.

In addition, DMC and the proposed project satisfies the four requirements established by the Alabama Supreme Court with regard to the physician office exemption:

1. That the proposed services are to be provided, and related equipment used, exclusively by the physicians identified as owners or employees of the physicians' practice for the care of their patients.

The services and equipment related to the proposed project will be used exclusively by the physician employees of DMC.

2. That the proposed services are to be provided, and related equipment used, at an office of such physicians.

The services and equipment related to the proposed project will be installed and provided at the DMC office to be located in a POB on the Infirmary Health Malbis Campus in Daphne, Alabama.

3. That all patient billings related to such services are through, or expressly on behalf of, the physicians' practice.

All services related to the proposed project will be billed expressly on behalf of DMC as a physician office.



PRESTON
STRATEGY
GROUP

4. That the equipment will not be used for inpatient care, nor by, through, or on behalf of a health care facility.

The equipment related to the proposed project will not be used for inpatient care, nor by, through, or on behalf of a health care facility.

An attestation to the facts presented in this request is attached. The \$1,000 filing fee for this Reviewability Determination Request is being submitted through the SHPDA payment portal.

If you have any questions or need any additional information, please contact me.

Sincerely,

Stephen D. Preston

Attachment



Infirmary Medical Clinics
INFIRMARY HEALTH

February 20, 2025

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

RE: Reviewability Determination Request
IMC-Diagnostic and Medical Clinic

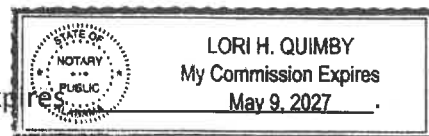
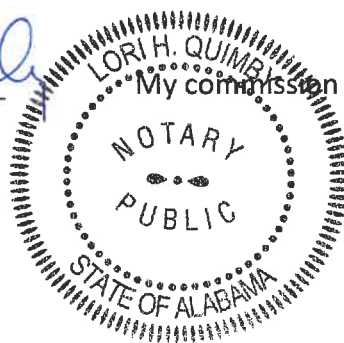
Affirmation of Requesting Party:

The undersigned, being duly sworn, hereby make oath or affirm that he is Vice President of IMC-Diagnostic & Medical Clinic, LLC, 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: Joe T. Stough, III
Joe T. Stough, III
Vice President, IMC-Diagnostic & Medical Clinic, LLC

SUBSCRIBED AND SWORN to before me this 20th day of February, 2025.

Lori H. Quimby
Notary Public





PRESTON
STRATEGY
GROUP

RV2025-028

RECEIVED

Apr 03 2025

STATE HEALTH PLANNING AND
DEVELOPMENT AGENCY

FILED: shpda.online@shpda.alabama.gov

April 3, 2025

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

RE: RV2025-028
IMC-Diagnostic and Medical Clinic

Dear Ms. Marsal:

This letter will confirm my receipt of your March 3, 2025, correspondence regarding the Reviewability Determination Request filed on behalf of IMC-Diagnostic and Medical Clinic. I am pleased to provide the requested additional information below:

1. The complete ownership structure identified in the request is confirmed as IMC-Diagnostic and Medical Clinic (DMC), a limited liability corporation organized under Infirmary Medical Clinics, PC.
2. DMC is the largest private multi-specialty clinic in Alabama, and for over 70 years the clinic has been providing quality healthcare to the patients of south west Alabama. The clinic provider comprehensive medical care with an engaged core of primary care physicians, complemented by a multispecialty care network. In addition to the robust provider network clinic has an extensive offering of state of the are diagnostic services including advanced imaging, an on-site cutting-edge laboratory, and many other specialized ancillary services. The locations and services provided are attached - including satellite outreach locations into rural areas not staffed every day of the week.
3. The list of currently employed physicians is attached.
4. Planned emergency procedure protocols will include:
 - Appropriate patient criteria policies and procedures
 - Linear Accelerator Emergency Shutdown policies and procedures, including patient distress, shutdown and disable steps/instructions.
 - 911 Emergency policies and procedures.



5. The Reviewability Determination Request and supplemental information is filed on behalf of DMC, a private, multi-specialty physician office. ALA. ADMIN. CODE r. 410-1-4-.01 (CON Rules and Regulations) New Institutional Health Services Subject to Review refers to health services, health care facilities, or a health maintenance organization.

Approximate costs are not expected to exceed any of the CON expenditure thresholds in effect at the time of this filing.

6. DMC will purchase all equipment for the proposed project.

Please let me know if you have any additional questions in order to complete the determination request.

Sincerely,

Stephen D. Preston

DMC Locations and Services including satellite outreach facilities

1700 Springhill Avenue, Mobile, Al 36604

Allergy and Immunology, Cardiology, Critical Care, Electrophysiology, Endocrinology, Gastroenterology, Internal Medicine, Medical Oncology, Pulmonology, Rheumatology, Sleep Medicine

1720 Springhill Avenue, Mobile, Al 36604

Interventional Neurology, Neurology, Neuro-Ophthalmology, Ophthalmology -Retina

831-C Hillcrest Road, Mobile, Al 36695

Cardiology, Family Medicine, Internal Medicine, Neurology, Optometry, Pulmonology, Sleep Medicine

9570 U.S Hwy. 90 , Daphne, Al 36526

Cardiology, Endocrinology, Family Medicine, Gastroenterology, Internal Medicine, Medical Oncology, Neurology, Neuro-Ophthalmology, Ophthalmology, Ophthalmology-Retina, Pediatric Cardiology, Rheumatology

95 Shell Street Bldg. A, Saraland , Al 36571

Cardiology, Electrophysiology, Family Medicine, Internal Medicine, Medical Oncology, Neurology

2000 McMillan Avenue, Bay Minette, Al 36507

Cardiology, Electrophysiology, Medical Oncology

5 Mobile Infirmary Circle, G805, Mobile, Al 36607

Medical Oncology, Radiation Oncology

188 Hospital Drive Suite 303, Fairhope, Al 36532

Medical Oncology

808 Morphy Ave, Fairhope, Al 36532

Radiation Oncology

297-A South Jackson Street , Grovehill, Al 36451

Cardiology, Electrophysiology

302 Whetstone Street , Monroeville, Al 36460

Cardiology

33650 Hwy 43, Thomasville, Al 36784

Cardiology, Electrophysiology

3601 South Alabama Avenue, Monroeville, Al 36460

Ophthalmology- Retina

166 Lindberg Avenue , Atmore, Al 36502

Ophthalmology- Retina

DIAGNOSTIC AND MEDICAL CLINIC

* travel to other satellites

	Cindy T. Patton, M.D.	Allergy and Immunology	Employed
	Megan Courtney, M.D.	Cardiology (Bay Minette only)	Employed
*	George A. Eyrich, M.D.	Cardiology	Employed
	Mina A. Jacob, M.D.	Cardiology	Employed
*	Patrick Murphy, M.D.	Cardiology	Employed
*	Michael Mansour, M.D.	Cardiology	Employed
*	J. Michael O'Dowd, M.D.	Cardiology	Employed
	Hercules Panayiotou, M.D.	Cardiology	Employed
	Theresa Roca, M.D.	Cardiology- Pediatrics (Malbis only)	Employed
*	David Shaw, M.D.	Cardiology	Employed
	Thomas Turnage, M.D.	Cardiology	Employed
	Terry Wilsdorf	Cardiology (Malbis only)	Employed
*	Will Bolton, M.D.	Endocrinology	Employed
	Michael Davis, M.D.	Endocrinology	Employed
*	Anita S. Kemmerly, M.D.	Endocrinology	Employed
*	Zaid Alnoah, M.D.	Gastroenterology	Employed
	Gabriel Bolanos, M.D.	Gastroenterology	Employed
*	Bennett Hooks, M.D.	Gastroenterology	Employed
*	Robert Lerner, M.D.	Gastroenterology	Employed
	F. Steven Orleans, M.D.	Gastroenterology (Hospital only)	Employed
	Randy Tillman, M.D.	Gastroenterology (Hospital only)	Employed
	Patricia Burch, M.D.	Internal Medicine	Employed
	G. Tyler Butts, M.D.	Internal Medicine	Employed
	Christopher R. Chauvin, M.D.	Internal Medicine	Employed
*	T. Clayton Coleman, M.D.	Internal Medicine	Employed
	Damian J. Collins, M.D.	Internal Medicine	Employed
	Stephen A. Davis, M.D.	Internal Medicine	Employed
	J. Allan Banks, M.D.	Internal Medicine	Employed
*	Christopher Gamard, M.D.	Internal Medicine	Employed
	Coby Harrison, M.D.	Internal Medicine	Employed
	Jason Harrison, M.D.	Internal Medicine	Employed
	William C. Hicks III, M.D.	Internal Medicine	Employed
	William Kleinschrodt, M.D.	Internal Medicine	Employed
	F. Martin Lester, M.D.	Internal Medicine	Employed
	Jonathan Miller, M.D.	Internal Medicine	Employed
	Daniel Polansky, M.D.	Internal Medicine	Employed
*	K. Keith Varden, M.D.	Internal Medicine	Employed
*	Jacob B. Webster, M.D.	Internal Medicine	Employed
*	N. Brice Whetstone, M.D.	Internal Medicine	Employed
	Bobby A. Wrights, M.D.	Internal Medicine	Employed
	David C. Ross, M.D.	Internal Medicine (Malbis only)	Employed

	Elizabeth Wood, M.D.	Internal Medicine (Malbis only)	Employed
	Justin Cullifer, D.O.	Family Medicine (Malbis only)	Employed
	Jared Jones, M.D.	Family Medicine (Malbis only)	Employed
	Robert B. McKnight, M.D.	Family Medicine (Malbis only)	Employed
	S. Grayson Saville, M.D.	Family Medicine (Malbis only)	Employed
	John G. Vanderwood, M.D.	Family Medicine (Malbis only)	Employed
*	Thaddeus Beeker, M.D.	Medical Oncology	Employed
*	Prajwal Pathak, M.D.	Medical Oncology	Employed
*	Furhan Yunus, M.D.	Medical Oncology	Employed
*	John Russell, M.D.	Radiation Oncology	Employed
*	Addison Willett, M.D.	Radiation Oncology	Employed
	Charles Fagan, M.D.	Neurology (Hospital Only)	Employed
*	B. Scott Hollensworth, M.D.	Neurology	Employed
*	Matthew S. McLean, M.D.	Neurology	Employed
	John Andrew Cox, M.D.	Neurology	Employed
	Christopher Southwood, M.D.	Neurology	Employed
	Nicole Wysocki, M.D.	Neurology (Hospital Only)	Employed
	Daniel Young, M.D.	Neurology (Hospital Only)	Employed
*	Paul Taupeka, M.D.	Neuro- Ophthalmology	Employed
*	Alan Franklin, M.D.	Ophthalmology- Retina	Employed
	William F. Murrah, III, M.D.	Ophthalmology (Malbis Only)	Employed
	Chibuzo Odigwe, M.D.	Pulmonary/Critical Care	Employed
*	Cynthia Crowder-Hicks, M.D.	Pulmonology	Employed
	Adrian Divittorio, M.D.	Pulmonology	Employed
	Robert Percy, M.D.	Pulmonology	Employed
	Sameh Syed, M.D.	Pulmonology	Employed
	Thomas McGee, M.D.	Rheumatology	Employed
*	Ray McLaughlin, M.D.	Rheumatology	Employed
	Daren Scroggie, M.D.	Rheumatology (Malbis Only)	Employed
	Joseph Bosarge, M.D.	Intensivist (Hospital Only)	Employed
	Matt Clukies, M.D.	Intensivist (Hospital Only)	Employed
	Shilpa Gadde, M.D.	Intensivist (Hospital Only)	Employed
	Mark Knower, M.D.	Intensivist (Hospital Only)	Employed
	Eric Lucas, M.D.	Intensivist (Hospital Only)	Employed
	Christopher Richardson, M.D.	Intensivist (Hospital Only)	Employed
	Michael Wilson, M.D.	Intensivist (Hospital Only)	Employed
	Astra Autumn Amonett, CRNP	Hospital Only	APP
	Matthew "Matt" E Barnes, CRNP	Hospital Only	APP
	Amanda Chandler, CRNP		APP
	Mecquicael "Mimi" L Clarke, CRNP		APP
*	Crystal L Dorriety, CRNP		APP
	Patricia "Pat" Hall, CRNP		APP
	Veronica L Jones, CRNP	Hospital Only	APP
	Anthony McPherson, CRNP	Hospital Only	APP
	Hannah L Quinley, CRNP	Hospital Only	APP

	Austin Vivar, CRNP	Hospital Only	APP
	Lacey Harvey, CRNP	Hospital Only	APP
	April W Reed, CRNP		APP
	Diana P Smith, CRNP		APP
	Elise S Split, CRNP		APP
	Jennifer H Umbarger, CRNP		APP
	Tracey M Jones, CRNP		APP
*	Kenya M Kidd, PA-C		APP
*	Ginela P Leininger, CRNP		APP
*	Meredith K Veazey, PA		APP
	Ashley Booth, CRNP		APP
	Rhonda Brannan, CRNP		APP
	Jacob D Dunnam, CRNP	Hospital Only	APP
	Lawanda S Fantroy, CRNP	Hospital Only	APP
	Shannon B Harris, CRNP	Hospital Only	APP
	April Calvert, CRNP	Malbis Only	APP
	Chastidy L Robb, CRNP	Hospital Only	APP
	Debra Simms, CRNP	Hospital Only	APP
	Kennedy Edwards, CRNP	Hospital Only	APP
	Brandy Beckham, CRNP	Hospital Only	APP
	Lauren Bender, CRNP	Hospital Only	APP
	Crystal Uzoije, CRNP	Hospital Only	APP
	Madeline Edwards, PA	Hospital Only	APP
	Kayla Byrd, CRNP		APP

DIAGNOSTIC AND MEDICAL CLINIC- NORTHSIDE

Deanna Thomas, CRNP	Family Medicine	APP
Scott Carver, MD	Family Medicine	Employed
Jason West, MD	Family Medicine	Employed
Larry Thead, MD	Family Medicine	Employed
Bryan Crenshaw, MD	Family Medicine	Employed
Michael Holland, DO	Family Medicine	Employed
Jason Valentine, MD	Family Medicine	Employed
Howard Cox, DPM	Podiatrist	Employed
Amanda Toris, CRNP		APP

DIAGNOSTIC AND MEDICAL CLINIC- HILLCREST

Ashleigh Butts-Wilkerson, MD	Family Medicine	Employed
Alphonse Jeffrey Zieman, MD	Family Medicine	Employed
Meagan Taylor, DO	Family Medicine	Employed
Sudeep Rao, MD	Internal Medicine	Employed
Roger Alvarado, MD	Internal Medicine	Employed
Barbara Mitchell, MD	Internal Medicine	Employed
Sarah Small, OD	Optometrist	Employed



RV2025-028

RECEIVED

May 14 2025

STATE HEALTH PLANNING AND
DEVELOPMENT AGENCY

FILED: shpda.online@shpda.alabama.gov

May 14, 2025

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

RE: RV2025-028
IMC-Diagnostic and Medical Clinic

Dear Ms. Marsal:

In addition to the original Reviewability Determination Request filed on February 21, 2025, and supplemental information submitted on April 3, 2025, below, please see further documentation supporting this request.

1. Detailed information concerning the full scope of healthcare services currently provided by IMC-Diagnostic and Medical Clinic:

IMC-Diagnostic and Medical Clinic's goal is to treat our patients with the utmost professionalism, compassion and care. With a vision of becoming the FIRST CHOICE for healthcare in our region, IMC-Diagnostic and Medical Clinic's mission is LIFE. This represents their values, to be a leader in quality medical care and treat patients with integrity, a focus on family and excellence. These values inform everything they do. However, the broader purpose of IMC-Diagnostic and Medical Clinic is to support Mobile Infirmary and other Infirmary Health hospitals by providing a wide range of specialist outpatient services to the community. The goal is a network of healthcare providers to ensure that patients receive the care they need when they need it, and that the clinic is able to point them to the proper specialist to help guide them through an individual plan back to health.

Specialties Include:

Allergy/Immunology	Cardiology	Diabetes	Electrophysiology
Endocrinology	Family Medicine	Gastroenterology	Hematology/Oncology
Internal Medicine	Neurology	Neuro-Ophthalmology	Occupational Health
Ophthalmology	Pediatric Cardiology	Peripheral Vascular	Pulmonology/Critical Care
Retina Specialty	Rheumatology	Sleep Medicine	Structural/Interventional Cardiology



2. Details concerning the external beam/linear accelerator equipment being purchased for the proposed project. The proposed equipment is from Varian Medical Systems with associated cost of \$3,274,499.

Please let me know if you have any additional questions in order to complete the determination request.

Sincerely,

Stephen D. Preston