




## STATE HEALTH PLANNING AND DEVELOPMENT AGENCY

100 NORTH UNION STREET, SUITE 870  
MONTGOMERY, ALABAMA 36104

### MEMORANDUM

DATE : June 23, 2025  
TO: All Interested Parties  
FROM: Emily T. Marsal   
Executive Director  
SUBJECT: Reviewability Determination Request (RV2025-030)

The attached request for a reviewability determination has been received. Any affected person may file written comments regarding this request, per 410-1-7-.02 of the *Alabama Certificate of Need Program Rules and Regulations*, by August 4, 2025.

Pursuant to ALA. ADMIN. CODE r 410-1-3-.09, all documents to be filed with the Agency must be submitted to [shpda.online@shpda.alabama.gov](mailto:shpda.online@shpda.alabama.gov) in PDF, text searchable format.

Enclosure: see attached

April 1, 2025

**SENT VIA ELECTRONIC MAIL ONLY**  
([shpda.online@shpda.alabama.gov](mailto:shpda.online@shpda.alabama.gov))

State Health Planning and Development Agency  
Emily Marsal, Executive Director  
SA Union Building  
100 N. Union Street, Ste. 870  
Montgomery, AL 36104

CO2025-030  
**RECEIVED**  
**Apr 03 2025**

STATE HEALTH PLANNING AND  
DEVELOPMENT AGENCY

**RE: Reviewability Determination Request SmoothRock Surgery Center (SHPDA ID No. 073-U3714)**

Dear Ms. Marsal:

In accordance with SHPDA Rule 410-1-7-.02(1), Reviewability Determination Request, the following is acknowledged.

1. Cutaneous Oncology and Surgery Center, LLC d/b/a SmoothRock Surgery Center (SRSC) request a Determination Request review to add cosmetic procedures to the current approved specialties under the CON. The center has 4 (four) operating rooms and 4 (four) supporting recovery beds.
2. The current facility located at 1940 Stonegate Dr, Suite 140, Vestavia Hills, AL 35242, was granted a certificate of need (CON) on April 5, 2012 and approved for dermatological surgery, oculoplastic surgery, skin cancer removal and the reconstruction of cutaneous defects. This request is being submitted to request permission under SHPDA Rule 410-1-.02, Certificate of Need (CON) 2565ASC, to include cosmetic procedures. Cosmetic surgery, also known as aesthetic surgery, refers to medical procedures performed to improve a person's physical appearance. These procedures are typically elective and aim to enhance body contours, remove imperfections, or restore youthful features. Cosmetic procedures requested will be reimbursed through cash payment by the patient, with no purpose at this time of engaging with third party payers or Medicare recipients.
3. The service area as designated in Certificate of Need 2565-ASC issued April 5, 2012 remains unchanged with the surgery center located in Jefferson County, Alabama, serving the county and surrounding areas.

Cutaneous Oncology and Surgery Center, LLC d/b/a SmoothRock Surgery Center (SRSC) is a licensed ambulatory surgery center that is Medicare certified and accredited by AAAHC (Accreditation Association for Ambulatory Health Care). In being recognized with these achievements, SRSC promotes the highest quality of patient safety as part of its care during admission to the ambulatory surgery setting.



SRSC with its organizational structure and setting promotes private, attention to detail care to assure the patient experience is private and comfortable during admission to the surgery center. The setting of SRSC promotes an environment for guest comfort from providing a snack shop in the building to the comfort of areas where the patient's family can seek privacy during the patient's admission to the center.

4. The owner of SRSC acknowledges the certificate of need includes dermatological surgery, oculoplastic surgery, skin cancer removal and the reconstruction of cutaneous defects to expand to include cosmetic surgery. SRSC desires to expand the procedures approved for the facility to include the following cosmetic procedures to include but not limited to:
  - Liposuction
  - Abdominoplasty
  - Facelift
  - Breast augmentation and mastopexy
  - Blepharoplasty.The procedures are considered cosmetic surgery that can be safely performed in an ambulatory surgery setting.
5. Expenditures to add additional procedures will not exceed the Alabama Code 22-21-263(a)(2). Capital cost projections are attached totaling approximately \$25,920.
6. Disclosure of financial interest- the financial interest remains consistent with the correspondence dated Feb 2, 2023. As approved in the change of ownership filed in January 2023, Aqua Dermatology Management, LLC owns one hundred percent (100%) of the membership interest in Cutaneous Oncology and Surgery Center, LLC d/b/a SmoothRock Surgery Center.

Should you have any questions or require additional information, please contact, Gayle Evans via email at [gevans@chcconsultants.com](mailto:gevans@chcconsultants.com)

Sincerely

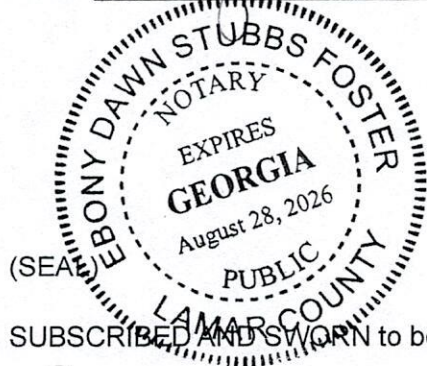
A handwritten signature in blue ink, appearing to read "Gayle R Evans", with a stylized, cursive script.

Gayle R Evans, RN BSN MBA

**Affirmation of Requesting Party**

The undersigned, being first duly sworn, hereby make oath or affirm that he/she is [include position with entity requesting the determination], has knowledge of the facts in this request, and to the best of his/her/their information, knowledge and belief, such facts are true and correct.

Affiant *Sullivan*



SUBSCRIBED AND SWORN to before me this 1<sup>st</sup> day of April 2025

*Ebony Dawn Stubbs Foster*  
Notary Public

My commission expires August 28, 2026

**CUTANEOUS ONCOLOGY AND SURGERY CENTER, LLC d/b/a SMOOTHROCK SURGERY CENTER**

<b>Proposed Fee Schedule</b>	
Facelift	\$ 8,500.00
Eyelid Surgery	\$ 4,500.00
Breast Surgery	
Augmentation	\$ 6,500.00
Mastopexy	\$ 6,000.00
Abdominoplasty	\$ 6,500.00
Liposuction	
Single Area	\$ 4,500.00
Multiple Area	\$ 6,500.00

**Fees include procedure/facility, surgeon**



# CUTANEOUS ONCOLOGY AND SURGERY CENTER, LLC d/b/a SMOOTHROCK SURGERY CENTER

## Financial Projections

Capital	Model	Estimated Costs
Anesthesia Machine	GE AVance S5	\$ 9,420.00
Tumescent Liposuction Machine and cannulas	Affiliated Dermatology	\$ 8,500.00
Instruments		\$ 3,000.00
Anesthesia Monitor		\$ 5,000.00
Other equipment is currently owned by the ASC		\$ 25,920.00

**Operation Costs**  
 approximately 30% plus anesthesia fee and physician fee

Anesthesia Fee	\$ 500.00	1st hour
	\$ 50.00	each 15 min (1 unit)_ thereafter

June 5, 2025

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State Health Planning and Development Agency  
Emily Marsal, Executive Director  
SA Union Building  
100 N. Union Street, Ste. 870  
Montgomery, AL 36104

**RE: RV2025-030 Cutaneous Oncology and Surgery Center, LLC d/b/a SmoothRock Surgery Center (SHPDA ID No. 073-U3714)**

Dear Ms. Marsal:

Please find explanation of the requested supplemental information for the referenced request.

1. The request asserts the expenses associated with this proposal will not exceed any of the CON expenditure thresholds. The Certificate of Need thresholds in effect at the time of filing this were \$3,379,066.00 for major medical equipment; \$1,350,305 for new annual operating costs; and \$6,751,537.00 for capital expenditures. The applicant estimates \$25,920.00 in total equipment costs for the proposed addition of cosmetic procedures to the surgery center in Jefferson County, Alabama. Please provide the approximated costs regarding first year annual operating cost and capital expenditures, which encompasses leases, land/building costs, and construction expenses, for the proposed project. There is minimal equipment startup costs since the facility exists and has general instrumentation that can be used for startup.

**Response:**

The surgery center exists currently performing procedures for the Dermatology and Oculoplastic surgery. Direct costs associated with the addition of the plastics specialty are listed below based on a conservative startup year one. **Capital costs** for this project are estimated to be **\$25,920** for additional equipment to serve the specialty as previously presented. The ASC will perform plastic surgery procedures initially one day a week. There will be an estimated three (3) procedures per day totaling 144 procedures per year.

<b>Costs Projections (year 1)</b>	<b>Staffing Wages and Benefits</b>	<b>Procedure Anesthesia and Supplies</b>
\$886,080	\$511,680	\$374,400



2. Please provide the Agency with planned emergency procedures in place on behalf of the proposed provision of cosmetic procedures at the existing medical facility.

**Response:**

The following outlines the emergency procedures, policies, and protocols that are currently in place:

- The ASC has a transfer agreement with Grandview Medical Center in place for an emergency patient transfer when necessary.
  - All emergency medical equipment for the care of a patient in the event of an unanticipated patient emergency is connected to the facility generator and/or the equipment internal battery backup. The equipment batteries and generator are checked on a regular basis and documented accordingly based on manufacturer's instructions for use.
  - Anesthesia medications known to potentially trigger malignant hyperthermia will be required for the procedures. Policies and procedures, medications and necessary equipment and staff training will be implemented to care for these patients when the CON is updated. Currently this is not required for the type of patients that are being treated in the surgery center. The highest level of sedation currently is IV nurse sedation with local infiltration.
  - Protocols are currently in place to provide care for patient emergencies. These include:
    - Staff training on hire and annually including a cardiac arrest drill.
    - Medications for patient emergencies;
    - Airway management when there is an airway obstruction;
    - Patient monitoring systems to treat the patient hemodynamic and respiratory emergencies;
    - Policies and procedures that give direction for care of the patient and the staff roles during a patient emergency.
  - Staff is trained upon hire and annually for all emergency preparedness activities to include natural disaster and patient emergencies. The minimum patient emergency training includes Basic Life Support and the registered nurses are Advanced Cardiac Life Support trained. An annual drill is conducted to maintain competency of the staff in their respective roles.
3. The request indicates that SmoothRock Surgery Center currently has four (4) operating rooms and four (4) supporting recovery beds and seeks to add cosmetic procedures which include but are not limited to liposuction, abdominoplasty, facelifts, breast augmentation and mastopexy and blepharoplasty to the existing ASC. Please provide additional details concerning the proposed project including whether actual gross square footage will be added as well as the total number of new operating rooms and supporting recovery beds upon completion of the proposal.

**Response:**

The existing space was equipped when the initial setup/licensure occurred to perform general anesthesia for oculoplastic surgery. Since that time the physical plant and all of the mechanical equipment such as the generator, HVAC, vacuum pump, fire systems have been maintained for surgery center utilization according to the manufacturer



recommended care and in accordance with the original ambulatory surgery center license and CON. There is no additional space needed for this project since the original construction was completed for classification as an operating room environment and supporting services and patient beds.

Should you have any questions or require additional information, please contact, Gayle Evans via email at [gevans@chcconsultants.com](mailto:gevans@chcconsultants.com)

Sincerely,

A handwritten signature in blue ink that reads "Gayle R Evans". The signature is written in a cursive, flowing style.

Gayle R Evans, RN BSN MBA

Cutaneous Oncology and Surgery Center, LLC d/b/a SmoothRock Surgery Center

**First Year Operating Expenses**

Clinical Comp	\$	416,000
T&B	\$	95,680
<b>Clinical Comp</b>	<b>\$</b>	<b>511,680</b>

Anesthesia	\$	86,400
Supplies	\$	288,000
<b>Supply Costs</b>	<b>\$</b>	<b>374,400</b>
Marketing	\$	10,000

**Total operating costs**     **\$    896,080**  
**Year 1**

**Capital Equipment**                     **\$25,920**  
**Year 1**

**Total Year 1 Startup**                     **\$922,000**  
**Costs**

RV2025-030  
**RECEIVED**  
**Jun 17 2025**  
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