



HALE COUNTY HOSPITAL
508 GREENE STREET
GREENSBORO, AL 36744

phone
334.624.3024
fax
334.624.3800

November 6, 2025

SENT VIA EMAIL TO:

Emily.marsal@shpda.alabama.gov
Shpda.online@shpda.alabama.gov

Ms. Emily Marsal

Executive Director
Alabama State Health Planning and Development Agency
RSA Union Building
100 North Union Street, Suite 870
Montgomery, AL 36104

RV2026-005R
RECEIVED
Nov 06 2025

STATE HEALTH PLANNING AND
DEVELOPMENT AGENCY

**Re: Reviewability Request – Hale County Hospital Emergency
Department New Construction**

Dear Ms. Marsal:

This correspondence supersedes the prior request for non-reviewability submitted in May 2024 concerning the Emergency Department renovation. The Hale County Health Care Authority (the “Authority”), which owns and operates Hale County Hospital (the “Hospital”) in Greensboro, Hale County, Alabama, hereby requests a written determination confirming that the proposed Emergency Department expansion project is not subject to Certificate of Need (CON) review.

Attached for your reference is a report generated on November 6, 2025, by the Rural Health Information Hub, funded by the Federal Office of Rural Health Policy, confirming that Hale County Hospital is federally designated as a **Rural Hospital**.

The Hospital currently operates an emergency department on its main campus. Due to space limitations that impede patient throughput and operational efficiency, the Hospital proposes constructing a **5,966-square-foot Emergency Department expansion** to its existing facility. The existing Emergency Department will be converted to office space. The project will include:

- Two (2) additional dedicated and enclosed emergency treatment rooms
- A new waiting and reception area
- A nursing station
- Restrooms designated for Emergency Department use





HALE COUNTY HOSPITAL

508 GREENE STREET
GREENSBORO, AL 36744

phone
334.624.3024
fax
334.624.3800

This expansion is intended to improve patient flow and enhance emergency service delivery for residents of Hale County.

Project Summary and Supporting Information

Applicant:

The Hale County Health Care Authority of Greensboro, Hale County, Alabama
d/b/a Hale County Hospital

Primary Contact:

Shay Cherry, Chief Executive Officer
Phone: (334) 624-3024 ext. 2229
Email: s.cherry@halecohosp.com

Address:

Hale County Hospital
508 Greene Street
Greensboro, AL 36744

Service Area:

Hale County, Alabama

Services to Be Provided:

Emergency Services

Financial Overview

Category	Amount
Equipment and Furniture	\$200,000
Construction Costs	\$3,713,480.86
Leases	\$0.00
Land/Building Costs	\$0.00
New Annual Operating Costs	\$0.00 (Existing service)

No other health care entity has any financial interest in the proposed project.





HALE COUNTY HOSPITAL

508 GREENE STREET
GREENSBORO, AL 36744

phone
334.624.3024
fax
334.624.3800

Regulatory Context

The proposed construction does not exceed any applicable CON expenditure thresholds as defined in **Section 410-1-2-.07** of the CON Rules, effective October 1, 2023, which are:

- \$3,322,582 for major medical equipment
- \$1,327,734 for new annual operating costs
- \$6,638,679 for other capital expenditures

Furthermore, the proposed project will not:

- Increase the number of licensed inpatient beds;
- Reclassify existing beds; or
- Implement a new institutional health service or alter the Hospital's current service area.

Based on these factors, the proposed project should not be subject to Certificate of Need review pursuant to **Ala. Code §22-21-263** and **CON Rule 410-1-2-.07**.

Conclusion

Accordingly, the Hale County Health Care Authority respectfully requests formal confirmation that a Certificate of Need is not required for the proposed Emergency Department expansion described herein.

We appreciate your consideration of this request and would be pleased to provide any additional information or clarification as needed.

Sincerely,

 **Shay Cherry, CEO**

Shay Cherry
Chief Executive Officer
Hale County Health Care Authority
d/b/a Hale County Hospital





Am I Rural? – Report

Report produced by the Rural Health Information Hub on 11/06/25.

Location

Report Address:

Greensboro, Alabama *

Latitude: 32.7041

Longitude: -87.59216

Census Tract:

01065040401 (2020)

County:

Hale County, AL



* Report is for a specific point in Greensboro, Alabama. Results may not be the same for all points in Greensboro, Alabama.

Common Rural Definitions

How Your Location is Defined

Core Based Statistical Areas (CBSAs), 2025

Data Source: [2025 TIGER/Line](https://www.census.gov/geographies/mapping-files/time-series/geo/tiger-line-file.html) (<https://www.census.gov/geographies/mapping-files/time-series/geo/tiger-line-file.html>), U.S. Census Bureau

- CBSA Type: Metropolitan
- CBSA Name: Tuscaloosa, AL Metro Area
- CBSA ID: 46220

Urban Areas, 2020

Data Source: [2025 TIGER/Line](https://www.census.gov/geographies/mapping-files/time-series/geo/tiger-line-file.html) (<https://www.census.gov/geographies/mapping-files/time-series/geo/tiger-line-file.html>), U.S. Census Bureau

Not located in an Urban Area.

Federal Office of Rural Health Policy (FORHP) defined rural areas

Data Source: List provided by the Federal Office of Rural Health Policy - updated 9/12/2025

Hale County, AL has been designated by FORHP as rural.

Frontier and Remote Area (FAR) 2010

Data Source: [Frontier and Remote Area Codes, Economic Research Service](https://www.ers.usda.gov/data-products/frontier-and-remote-area-codes) (<https://www.ers.usda.gov/data-products/frontier-and-remote-area-codes>)

Note: FAR levels are based on 2010 ZIP codes, which may be different than what the location currently uses

ZIP code (2010): 36744

- Not located in a Frontier and/or Remote area.

For a full list of FAR ZIP codes, see: [Frontier and Remote Area Codes, Economic Research Service](https://www.ers.usda.gov/data-products/frontier-and-remote-area-codes) (<https://www.ers.usda.gov/data-products/frontier-and-remote-area-codes>).

Rural Urban Commuting Areas (RUCAs) by 2020 census tract

Data Source: [Rural-Urban Commuting Area Codes, Economic Research Service](https://ers.usda.gov/data-products/rural-urban-commuting-area-codes) (<https://ers.usda.gov/data-products/rural-urban-commuting-area-codes>)

- RUCA Code: 2.0
- Primary Description: Metropolitan high commuting: primary commuting flow is 30 percent or more to a metro UA

Rural Urban Continuum Codes (RUCCs) 2023

Data Source: [Economic Research Service](https://www.ers.usda.gov/data-products/rural-urban-continuum-codes) (<https://www.ers.usda.gov/data-products/rural-urban-continuum-codes>)

RUCCs are assigned at the county level.

Information for Hale County

- RUCC Code: 2
- RUCC Description: Metro - Counties in metro areas of 250,000 to 1 million population

How Your Location is Defined

Urban Influence Codes (UICs) 2024

Data Source: [Economic Research Service](https://www.ers.usda.gov/data-products/urban-influence-codes)
(<https://www.ers.usda.gov/data-products/urban-influence-codes>).

Information for Hale County

- Urban Influence Code: 4
- UIC Description: Small metro (in a metro area with fewer than 1 million residents)

Census 2020, Percent Rural

Data Source: [Urban and Rural](https://www.census.gov/programs-surveys/geography/guidance/geo-areas/urban-rural.html)
(<https://www.census.gov/programs-surveys/geography/guidance/geo-areas/urban-rural.html>), U.S. Census Bureau

Information for Hale County

- Percent of County Population that is Rural: 100.00

Program Eligibility

The information provided by this service addresses only the rural aspect of a program's requirements. Your *Am I Rural?* report is not a guarantee of your rural status. Please check with the program contacts directly to verify your eligibility for specific federal programs.

Program

Rural?

CMS - Rural Health Clinics (RHC) Program

YES

[CMS interim guidance](https://www.cms.gov/files/document/gso-23-12-rhc.pdf)
(<https://www.cms.gov/files/document/gso-23-12-rhc.pdf>) considers a location to meet the rural location requirement for the RHC program if it is outside of an urbanized area in the 2010 Census Bureau data OR if it is outside of an urban area in the 2020 Census Bureau data.

- This location is outside of 2010 Urbanized Areas
- Also, this location is outside of 2020 Urban Areas

Shortage Designations

Area Type		Details
Primary Care Health Professional Shortage Area (HPSA)	YES	Name: Hale County ID: 1015790314 Type: High Needs Geographic HPSA Score: 19 Date of Designation: November 17, 2003 Last Update: September 22, 2025
Dental Care HPSA	YES	Name: LI - Hale County ID: 6015910172 Type: HPSA Population Population: Low Income Population HPSA Score: 20 Date of Designation: April 10, 2023 Last Update: September 22, 2025
Mental Health HPSA	YES	Name: MHCA-10 ID: 7013092258 Type: Geographic HPSA Score: 12 Date of Designation: April 4, 2023 Last Update: September 22, 2025
Medically Underserved Area/Population	YES	Name: Hale County ID: 00032 Type: Medically Underserved Area Score: 55.0999985 Date of Designation: November 1, 1978 Last Update: November 6, 2013

For data sources and definitions, see the [Rural Classifications \(https://www.ruralhealthinfo.org/am-i-rural/help#classification\)](https://www.ruralhealthinfo.org/am-i-rural/help#classification) help section.



HALE COUNTY HOSPITAL
508 GREENE STREET
GREENSBORO, AL 36744

phone
334.624.3024
fax
334.624.3800

RV2026-005R

RECEIVED

Nov 20 2025

STATE HEALTH PLANNING AND
DEVELOPMENT AGENCY

Shay Cherry, CEO
Phone Number: 334-624-3024 ext. 2229
Email: s.cherry@halecohosp.com
The Hale County Healthcare Authority
d/b/a Hale County Hospital
508 Greene Street
Greensboro, AL 36744

3. Service Area: Hale County, Alabama
4. Services to be provided: Emergency Services
5. Financial Breakdown:
 - a. Equipment and Furniture: \$200,000
 - b. This is an existing service. No new annual operating costs
 - c. Capital Costs
 - i. Leases: 0.00
 - ii. Land/Building Costs: 0.00
 - iii. Construction Costs: \$3,713,480.86
6. No other health care facility has a financial interest in the proposed project.

The proposed construction will not exceed any of the CON expenditure thresholds set forth in Section 410-1-2-.07 of the CON rules, which effective October 1, 2023 are \$3,436,510.00 for major medical equipment, \$1,373,260.00 for new annual operating cost, and \$6,866,313.00 for other capital expenditures.

This proposed renovation in the emergency department will result in neither an increase in the number of licensed inpatient beds nor a reclassification of beds. Further, the renovation will not result in the implementation of a new institutional health service or change the Hospital's existing service area.

For these reasons, the proposed renovation is not subject to CON review. See Ala. Code 1975, 22-21-263; CON Rules 410-1-2.07. We therefore respectfully request your determination that Hale County Hospital is not required to obtain a CON in order to undertake the renovation described in this letter. We appreciate your consideration of this request, and we welcome the opportunity to address any questions regarding this matter.

Very Truly Yours,
Shay Cherry, CEO
Shay Cherry, CEO
Hale County Healthcare Authority



HALE COUNTY HOSPITAL
508 GREENE STREET
GREENSBORO, AL 36744

phone
334.624.3024
fax
334.624.3800

November 19, 2025

SENT THIS DATE VIA EMAIL TO:

Emily.marsal@shpda.alabama.gov; and
Shpda.online@shpda.alabama.gov

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

Re: Reviewability Request
Hale County Hospital
Emergency Department New Construction

Dear Ms. Marsal,

This letter supersedes the request for non-reviewability of the Emergency Department Renovation dated May 2024. The Hale County Health Care Authority (the "Authority") owns and operates Hale County Hospital (the "Hospital") in Greensboro, Hale County, AL. With this letter, we request, on behalf of the Authority, written confirmation that the Hospital is not subject to Certificate of Need review prior to building a new Emergency Department expansion of the existing Hospital. Please see the attached report (generated on November 6, 2025, by the Rural Health Information Hub, which is funded by the Federal Office of Rural Health Policy) that confirms the Hospital is classified as Rural by the federal government. Hale County Hospital currently operates an emergency department on its main hospital campus. The hospital's current emergency department presents patient throughput and efficiency challenges in the current treatment space. To improve patient throughput, Hale County Hospital plans to build a 6,000 square foot expansion to the Hospital to accommodate two (2) additional dedicated and enclosed emergency department treatment rooms, new waiting and reception areas, and nursing station, and restrooms for Emergency Department use.

The following information is provided to assist in evaluating this request:

1. **Name of Applicant:** The Hale County Healthcare Authority of Greensboro, Hale County, Alabama d/b/a Hale County Hospital
2. **Address and contact information:**





STATE HEALTH PLANNING AND DEVELOPMENT AGENCY

100 NORTH UNION STREET, SUITE 870
MONTGOMERY, ALABAMA 36104

FACTUAL INFORMATION REQUIRED FOR REVIEWABILITY DETERMINATION REQUESTS (SHPDA Rule 410-1-7-.02)

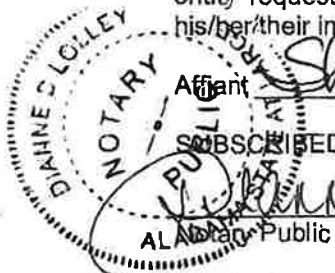
Any person may request for informational purposes only a determination as to the current reviewability of an anticipated project or determination of exemption for replacement equipment. Such request shall be submitted pursuant to the electronic filing requirements of SHPDA Rule 410-1-3-.09, disclosing full factual information, as more specifically identified below, and supplemented by any additional information or documentation which the Executive Director may deem necessary. SHPDA Rule 410-1-7-.02(1).

The following information must be included in all requests for reviewability determinations other than requests made pursuant to the Physician's Office Exemption (POE) or regarding End Stage Renal Disease (ESRD) stations, which must provide unique information specific to those providers:

1. Name of company seeking the reviewability determination.
2. Address and contact information for the authorized company representative seeking the determination.
3. Service area for the proposed service/equipment.
4. Any new/additional services to be provided under the proposed project.
5. Approximated costs of the proposed project for:
 - a. Equipment
 - b. First year annual operating costs
 - c. Capital costs, to include:
 - i. Leases
 - ii. Land/Building costs
 - iii. Construction costs
6. Disclosure of financial interests in the entity requesting the reviewability determination held by any other healthcare facilities or groups.
7. Attestation by an officer, partner or authorized agent of the company having knowledge of the facts disclosed in the reviewability request, utilizing the following form:

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 information, knowledge and belief, such facts are true and correct.



Affiant Shay Cherry, CEO (SEAL)

SUBSCRIBED AND SWORN to before me this

20th

day of

November, 2025

My commission expires

2/10/2027

Each determination must be accompanied by a \$1,000 filing fee submitted in accordance with SHPDA Rule 410-1-3-.09, Electronic Filing. Once deemed complete, notice of the request shall be published on the Agency's website for thirty (30) business days, and additional notice of the request shall be provided to the general distribution list maintained by the Agency. Any affected person may file comments with the Agency pursuant to SHPDA Rule 410-1-3-.09 regarding the issuance of the requested letter of non-reviewability. The Executive Director may provide a response to the request within forty-five (45) days of the request, unless additional time is needed to obtain additional information or to evaluate comments filed in opposition of the request.