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Feb 13 2026

STATE HEALTH PLANNING AND
DEVELOPMENT AGENCY

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February 13, 2026

VIA ELECTRONIC FILING (shpda.online@shpda.alabama.gov)

Hon. Emily Marsal
Executive Director
State Health Planning & Development Agency
100 North Union St., Suite 870
Montgomery AL 36104

Re: Request for Reviewability Determination
USA Health Children's & Women's Hospital – Interventional Radiology Suite

Dear Ms. Marsal:

Our firm represents USA Health Children's & Women's Hospital ("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 ("SHPDA") to develop a pediatric interventional radiology suite at CWH, including the addition of a bi-plane ("IR Suite"). A bi-plane is an advanced, dual-camera imaging system used in interventional radiology to produce high-resolution, 3D images of blood vessels, bones, and soft tissue. It captures simultaneous front and side views (using two rotating C-arms), significantly reducing procedure time, radiation exposure, and contrast dye needed during complex, minimally invasive, time-critical procedures. The increased precision often results in shorter operating times, less recovery time, and improved patient outcomes.

While CWH currently performs interventional radiology procedures, there is not a dedicated pediatric interventional radiology suite or equipment at CWH and current procedures are limited to ultrasound or C-arm mediated techniques.¹ Pediatric patients requiring more

¹ The current CWH interventional radiology team consists of one physician, one radiology technician, and two nurses. Algiers | Atlanta | Austin | Birmingham | Bogotá | Boston | Century City | Charlotte | Chattanooga
Chicago | Dallas | Denver | Fort Lauderdale | Houston | Jacksonville | London | Los Angeles | Mexico City
Miami | Monterrey | Nashville | Newport Beach | New York | Orlando | Philadelphia | Portland | Richmond
San Francisco | Seattle | Stamford | Tallahassee | Tampa | Tysons | Washington, D.C. | West Palm Beach
4834-3668-7859.2

advanced procedures utilizing imaging modalities such as a bi-plane are forced to either seek care at USA Health University Hospital (with the CWH pediatric interventional radiology team traveling to University Hospital to perform the procedures) or be referred out to University of Alabama Birmingham, Ochsner Health, or other hospitals outside of the Mobile County service area.

The development of the IR Suite, and in particular, the addition of a bi-plane, will allow CWH to offer additional interventional radiology services, including a neuro interventional service line, angiograms, embolization procedures, more extensive sclerotherapy, and fibrin sheath stripping. The IR Suite will also permit CWH to perform more minimally invasive procedures that have less risk of complications or infection, less post-procedural pain, and shorter recovery times, all while delivering the same success as traditional surgery. Importantly, it will also allow CWH to keep patients at the children's hospital for these services, instead of conducting procedures at USA Health University Hospital or referring to hospitals outside of the Mobile, Alabama service area. The proposed IR Suite will have a definitive impact on patient-centered care and will be a cornerstone in the treatment of childhood malignancies. These renovations to CWH, as the region's leader in pediatric hospital-based services and the only teaching facility, will go a long way in supporting the patients served by, and furthering the mission of, the institution.

The proposed IR Suite will require renovation of the current surgical business office, pathology office, a surgical exam room, and two surgical consult rooms. These renovations will be on the first floor of CWH, adjacent to the current CWH surgical department. IR Suite patients will utilize CWH's current pre- and post-operating space and staff.

This project will not involve any new service since interventional radiology is already performed by CWH (using C-arm and ultrasound technologies) and will not exceed any of the CON expenditure thresholds specified in Section 410-1-2-.07 of the Regulations: of \$3,436,510 for major medical equipment, of \$1,373,260 for new annual operating costs, or of \$6,866,313 for total capital expenditures, as currently adjusted for CPI. CWH represents that the proposed project will not exceed the following approximate costs:

Total Renovation Cost:	\$ 3,934,996.60 - \$4,500,000.00
Total Equipment Cost:	\$ 2,516,090.00 - \$2,900,000.00
Total Incremental Annual Operating Cost:	\$ 927,280.00 - \$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. 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 \$1,200.00 for this Letter of Non-Reviewability has been paid via the SHPDA electronic payment portal.

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Accordingly, based on the above, we respectfully request your determination that CWH is not required to obtain a CON in order to conduct the renovations described herein to the first floor of CWH and to add a bi-plane to develop and implement the IR Suite project. We appreciate your consideration of this request. Feel free to contact me (contact information above) or USA Health Children's & Women's Hospital, 1700 Center Street, Mobile, AL 36604, Attn: Natalie Fox, if you need further information or have any questions.

Sincerely,

Kristen A. Larremore

Kristen A. Larremore

cc: Natalie Fox
Julia Shreve
Colin Luke

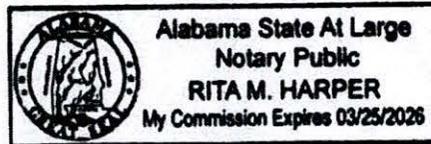
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The undersigned, being first duly sworn, hereby makes oath or affirms that she is the Chief Executive Officer for USA Health, University of South Alabama Health System has knowledge of the facts in this request, and to the best of her information, knowledge and belief, such facts are true and correct.

Affiant: Natalie Fox
Natalie Fox, DNP, PNP-BC

SUBSCRIBED AND SWORN to before me 2/13, 2026.

Rita M. Harper
Notary Public
My commission expires:



(SEAL)