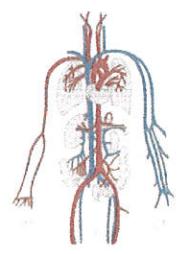


RV 2018-006

ALABAMA VASCULAR SOLUTIONS
632 2ND Street NE, Alabaster, AL 35007
WWW.ALABAMAVASCULARSOLUTIONS.COM



STEVE M. TAYLOR, M.D.
VASCULAR AND ENDOVASCULAR SURGERY

RECEIVED
JAN 05 2017
STATE HEALTH PLANNING
AND DEVELOPMENT AGENCY

September 25, 2017

Hon. Alva M. Lambert
Executive Director
State Health Planning and Development Agency
100 North Union Street
RSA Union Building, Suite 870
Montgomery, Alabama 36130-3025

Re: **Non-Reviewability Determination Request for Alabama Vascular Solutions.**

Dear Mr. Lambert:

On behalf of Alabama Vascular Solutions(AVS), I am writing to submit a reviewability determination request in accordance with the Alabama State Health Planning and Development Agency's Certificate of Need (CON) program rules and regulations. We are planning to add office-based, minimally invasive catheterization suite to our practice. This document will give an overview of the scope of procedures involved. We will also show how the criteria of the Physician Office Exemption, and thus non-reviewability, will be met by our office-based performance of those procedures.

Alabama Vascular Solutions is an Alabama LLC, founded in 2015, and is 100% owned by Dr Steve Taylor M.D. There are no investors and no hospital involvement with our practice. Dr. Taylor attended Undergrad school at the University of Alabama Birmingham from 1990-1992. He attended Medical school at the University of Alabama from 1992-1996. He did his General surgery residency from 1996 to 2001 at University of Alabama Birmingham and Vascular surgery fellowship at University of Alabama Birmingham from 2001 to 2004. He is Board Certified in General and Vascular Surgery. He is a Registered Physician in Vascular Interpretation (RPVI) and is one of few physicians in the Birmingham area that is PEVAR (Percutaneous Endovascular Aneurysm Repair) certified. Hyperbaric Chamber Certified for wound care.

Dr. Taylor has been published numerous times in various Vascular and Medical Journals. Prior to beginning his own practice in 2012, Dr. Taylor was an Associate Professor at UAB Hospital in the Dept of Vascular Surgery, training Surgical Residents, Vascular Fellows, as well as working with the Physican Assistants residents through the Surgical PA Program at UAB.

Dr. Taylor has over 14 years of experience in the treatment of arterial and venous disorders. Our main office is located at 1004 1st street north suite 150 Alabaster AL, 35007. AVS wishes to construct a catheterization laboratory within this medical office to perform low risk Vascular procedures, such as left and right diagnostic peripheral catheterizations, upper and lower extremity revascularizations, upper and lower arterial and venous angiograms,
AVS will not be performing any acute emergency cardiac interventions nor any coronary angioplasty in this Vascular catheterization laboratory.

We wish to offer patients the ease and convenience of an outpatient lab for the low risk procedures. This lab will be fully staffed by licensed employees for low risk outpatient procedures and it will not be used for inpatient care.

The total cost of the construction renovation related to this project is \$42,576. AVS is purchasing medical equipment including a GE9800 mobile c-arm, patient monitoring equipment, defibrillator, ultra sound, etc at a total cost of \$226,465. We anticipate our first year annual operating costs to be a total of \$655,109 which consists of the following:

Equipment/Construction Loan	\$63,780
Supplies/Consumables	\$416,000
Additional Wages/Benefits	\$175,329
Additional Rent/Lease	-0-

The criteria as adopted by the Supreme Court for the Physician Office Exemption are as follows:

1. 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.
2. The proposed services are to be provided, and related equipment used, at offices of such physicians.
3. All patient billings related to such services are through, or expressly on behalf of, the physicians' practice.
4. The equipment shall not be used for inpatient care, nor by, through, or on behalf of a health-care facility. Alabama Vascular Solutions will, through the performance of the procedures previously reviewed, meet the above criteria respectively as follows:
 1. Procedures will be performed only by physician owners or physician employees of AVS.
 2. All procedures will be performed in the office of Alabama Vascular Solutions.
 3. All equipment necessary for the performance of the procedures will be used only in the offices of AVS.
 4. All patient billing for the procedures performed will be done on behalf of and by employees of AVS.
 5. At no time will the equipment used for the performance of our office-based procedures be used for inpatient care, nor by, thru, or on behalf of any other health-care facility.

Based on the information given above, the proposed procedures in this matter should meet the criteria adopted by the Alabama Supreme Court for application of the Physician Office Exemption. Although the Physician Office Exemption serves as a bar to CON review, for your notice and information, we can also affirm that this venture will not exceed any of the certificate of need expenditure threshold nor will it constitute a "new institutional health service" under Alabama Code 22-21-263 and the Rules because:

- a) no new health care facility or health maintenance organization will be constructed, developed or acquired;
- b) no major medical equipment will be acquired by or on behalf of a health care facility that exceeds the statutory purchase price or operating expense thresholds;
- c) no new health care facility beds or stations will be added;
- d) no new health service that is currently offered by AVS will be provided with the implementation of the procedures described in this document; and

e.) no other even reviewable under the CON law or the Rules will occur as result of our implementation of the procedures described in this document.

With the support of this document we respectfully request that the Alabama State Health Planning and Development Agency grant a determination of non-reviewability to Alabama Vascular Solutions, LLC for the proposed procedures as described above. Please do not hesitate to contact us (office: 205-664-2420) if you require any further information or have any questions.

A check for the filing fee with respect to a request for a reviewability determination of \$1000, made payable to the Alabama State Health Planning and Development Agency, is enclosed. Thank you so much for your time and consideration in this matter.

Sincerely,

Steve Taylor MD

Dr. Steve Taylor
Alabama Vascular Solutions

Affirmation of Requesting Party:

The undersigned, being first duly sworn, hereby makes oath or affirms that he is a physician owner of Alabama Vascular Solutions, and to the best of his information, knowledge and belief, such facts are true and correct.

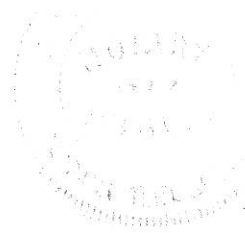
Affiant Steve Taylor, MD

SUBSCRIBED AND SWORN to before me this 5 day of Jan, 2018

Quida Stephens

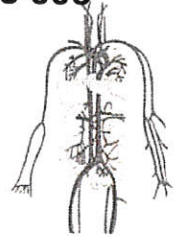
Notary Public

My commission expires: 6/8/21



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RV2018-006



STEVE M. TAYLOR, M.D.
VASCULAR AND ENDOVASCULAR SURGERY

September 25, 2017

Hon. Alva M. Lambert
Executive Director
State Health Planning and Development Agency
100 North Union Street
RSA Union Building, Suite 870
Montgomery, Alabama 36130-3025

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Dec 19 2017

STATE HEALTH PLANNING AND
DEVELOPMENT AGENCY

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AVS will not be performing any acute emergency cardiac interventions nor any coronary angioplasty in this Vascular catheterization laboratory.

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2. The proposed services are to be provided, and related equipment used, at offices of such physicians.
3. All patient billings related to such services are through, or expressly on behalf of, the physicians' practice.
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- b) no major medical equipment will be acquired by or on behalf of a health care facility that exceeds the statutory purchase price or operating expense thresholds;
- c) no new health care facility beds or stations will be added;
- d) no new health service that is currently offered by AVS will be provided with the implementation of the procedures described in this document; and

- e) no other event reviewable under the CON law or the Rules will occur as result of our implementation of the procedures described in this document.

With the support of this document we respectfully request that the Alabama State Health Planning and Development Agency grant a determination of non-reviewability to Birmingham Heart Clinic, P.C. for the proposed procedures as described above. Please do not hesitate to contact us (office: 205-664-2420) if you require any further information or have any questions.

A check for the filing fee with respect to a request for a reviewability determination of \$1300, made payable to the Alabama State Health Planning and Development Agency, is enclosed. Thank you so much for your time and consideration in this matter.

Sincerely,

S. Taylor, MD
Dr. Steve Taylor

Alabama Vascular Solutions

Affirmation of Requesting Party:

The undersigned, being first duly sworn, hereby makes oath or affirms that he is a physician owner of Alabama Vascular Solutions, and to the best of his information, knowledge and belief, such facts are true and correct.

Affiant S. Taylor MD

(SEAL)

SUBSCRIBED AND SWORN to before me this 26 day of September 2017.

Gilda Stephenson
Notary Public
My commission expires: 6/8/21