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STATE HEALTH PLANNING AND  
DEVELOPMENT AGENCY

VIA ELECTRONIC FILING

Hon. Emily Marsal  
Executive Director  
State Health Planning & Development Agency  
100 North Union St., Suite 870  
Montgomery AL 36104  
Shpda.online@shpda.alabama.gov

Re: Request for Reviewability Determination  
USA Health Children's & Women's Hospital

Dear Ms. Marsal:

Our firm represents USA Health Children's & Women's Hospital (the "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 to renovate the fifth floor of the women's tower at CWH to be utilized for post-partum patients.

This project will allow CWH to relocate and renovate the existing Mother/Baby unit at CWH in order to update and modernize the unit and to improve the safety and overall care for patients cared for in this unit. The proposed project consists of renovating a currently vacant floor of the hospital and relocating the post partum service by moving twenty (20) beds from the second floor to this new space on the fifth floor. The renovated space will consist of twenty (20) postpartum suites, a nursery for newborns, lactation support area, procedure room, meeting/teaching space for the community and internal use, family support areas, nurture room for mothers, and support areas for staff. The renovated unit will allow for a patient and family centered approach to care, improving space in the rooms to allow for visitors, safe patient navigation, and improved interior design for an improved healing environment. Space will be built to allow for adequate access to the patients, and also provide room for teaching space in the clinical areas. Support areas within the unit will be designed to provide for improved education of patients and promote a healing environment that will improve quality of care provided and received. These renovations to CWH, as the region's leader in births and the only teaching

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facility, will go a long way in supporting the patients served and furthering the teaching mission of the institution.

This project will not involve any new service and will not exceed any of the CON expenditure thresholds specified in Section 410-1-2-.07 of the Regulations: of \$3,079,347 for major medical equipment, of \$1,231,738 for new annual operating costs, or of \$6,158,695 for total capital expenditures, as currently adjusted for CPI. The CWH represents that the proposed project will not exceed the following approximate costs:

Total Relocation/Construction Cost:	\$ 4,302,200 - 4,916,800
Total Equipment Cost:	\$ 1,000,050
Total Incremental Annual Operating Cost:	\$ 0

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 \$1,000.00 for this Letter of Non-Reviewability has been paid via the SHPDA electronic payment portal.

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 fifth floor of its women's tower. We appreciate your consideration of this request. Feel free to contact me (contact information above) or Christopher Jett at (251) 415-1601 or USA Health Children's & Women's Hospital, 1700 Center Street, Mobile, AL 36604, Attn: Chris Jett, if you need further information or have any questions.

Sincerely,



Kristen A. Larremore

cc: Christopher Jett, CWH Administrator

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The undersigned, being first duly sworn, hereby makes oath or affirms that he is the Administrator for USA Health Children's & Women's Hospital, 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: *C. Jett*  
Christopher Jett

SUBSCRIBED AND SWORN to before me August 3, 2021.

*Beverly S. Croley*  
Notary Public  
My commission expires:

