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November 17, 2014

Alexandria Hicks, Coordinator
Certificate of Need Program
Department of Health and Social Services
3601 C Street, Suite 978
Anchorage, Alaska 99503-5924

Re: Request for CON Determination - Surgery Center of Wasilla, LLC

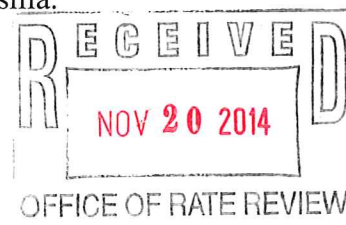
Dear Alexandria:

Our firm represents Surgery Center of Wasilla, LLC ("SCW"), an Alaska limited liability company, with respect to the prospective relocation of its ambulatory surgical facility to a new location in Wasilla. On behalf of SCW, we request a determination pursuant to 7 AAC 07.031 that the project described below is exempt from the certificate of need requirements set forth in AS 18.07 and 7 AAC 07.

SCW currently operates an ambulatory surgical facility in Wasilla. The existing surgical facility has one Class B operating room with one operating table. SCW plans to relocate its ambulatory surgical facility from its original location in Wasilla to a new location in the same community. The estimated starting date for the proposed relocation project is January of 2015, and the estimated completion date for the project is January or February of 2016. The new facility will have one Class C operating room, with one operating table, and either one or two procedure rooms. The facility at the new site would continue to provide one category of health care services, namely surgical services.

Pursuant to AS 18.07.031(c), an entity that "is lawfully operating an ambulatory surgical facility at a site may make an expenditure of any amount in order to relocate the services of that facility to a new site in the same community without obtaining a certificate of need as long as neither the bed capacity nor the number of categories of health services provided at the new site is greater."

We request a determination confirming our conclusion that under AS 18.07.03(c) a certificate of need is not required because SCW, a licensed ambulatory surgical facility located in Wasilla, proposes to move the facility to a new location in Wasilla.



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A certified estimate of the costs of the proposed project is unnecessary because the exemption set forth in AS 18.07.031(c) permits expenditure of any amount to relocate an ambulatory surgical facility. For purposes of your determination, you may assume that the construction costs for the relocated ambulatory surgical facility will exceed \$1.5 million.

Please contact me at the phone number or email address listed above if you need any additional information to make a determination as to whether the proposed relocation is except from the certificate of need requirement set forth in AS 18.07.

Very truly yours,

DURRELL LAW GROUP, P.C.



Heidi H. Borson