



August 15, 2025

Lindsey McLemore
Clerk of Council
3rd Floor
City Hall
1111 1st Avenue
Columbus, Georgia 31901

**RE: Certificate of Need Application – Piedmont Columbus Regional Midtown
Establish Open Heart Services**

Dear Ms. McLemore,

Enclosed please find a copy of the Certificate of Need application to be filed by The Medical Center, Inc. d/b/a Piedmont Columbus Regional Midtown (PCRM) for its project to provide open heart services. The application will be filed on August 18, 2025.

This copy is filed pursuant to Rule 111-2-2-.06(5)(e)7 which states:

"The applicant shall file one copy of the application with the office of the County Commissioner of the county in which the project exists or is proposed. The applicant shall submit with the application an exact copy of the letter addressed and submitted to the County Commission that accompanied the submittal of the application to the County Commission;"

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Scott Hill", written over a faint, larger blue ink signature.

M. Scott Hill
Chief Executive Officer



GEORGIA DEPARTMENT
OF COMMUNITY HEALTH

Georgia
Certificate of Need Application

FOR OFFICE OF HEALTH PLANNING USE ONLY	
2025031 PROJECT NUMBER GA	RECEIVED 8/18/2025 8:56:04 AM Office of Health Planning Georgia Department of Community Health
COUNTY: Muscogee	

GENERAL INFORMATION:

The Certificate of Need (CON) application is the required document that the Department reviews in the analysis and evaluation of proposed projects to establish or expand healthcare services and facilities in accordance with Ga. Comp. R. & Regs. r. 111-2-2. Requests to develop or offer new institutional health services must be completed and submitted only on the Department's application and supplemental forms, which are available at the Department's website: <https://dch.georgia.gov/con-applications-and-forms>. **ALTERATIONS TO THIS FORM ARE EXPRESSLY PROHIBITED EXCEPT WHERE A RESPONSE IS REQUESTED FROM THE APPLICANT AS DENOTED BY A TEXTBOX OR CHECKBOX.**

1. **DO NOT PLACE ANY DOCUMENTS OR ATTACHMENTS IN FRONT OF THIS COVER PAGE.**
2. Applicants must submit one (1) copy of the signed application. The application must be submitted electronically using the Department's web portal available here: <https://dch.georgia.gov/office-health-planning-applications-and-requests-forms-0>. **The application should be uploaded as one (1) MS Word document and should include the main application and all appendices.**
3. Payment of the filing fee shall be by credit/debit card via the Department's website, as available, or by certified check or money order made payable to the "State of Georgia" and must be received by the Department before an application will be accepted for review.
4. Failure to submit a complete application and to provide payment of the appropriate filing fee by the applicable deadlines will result in non-acceptance of the application.
5. Applications received after 3 p.m. will be deemed accepted the next business day.

PLEASE COMPLETE THE FOLLOWING TABLE TO VERIFY PROPER SUBMISSION OF YOUR APPLICATION	
Applicant Legal Name: The Medical Center, Inc. d/b/a Piedmont Columbus Regional Midtown	
1. Have you submitted one (1) copy of this signed application via the Department's web portal?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2. Is this application being filed by or on behalf of a hospital in a rural county? If YES → No filing fee is due. Enter \$0 at Line 4 and select "N/A" at Line 5. If NO → Continue to next question. "Rural County" means a county having a population of less than 50,000 according to the United States decennial census of 2010 or any future such census. Ga. Comp. R. & Regs. r. 111-2-2-.01(52).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3. Enter Total Cost Applicable to Filing Fee (From Line 16, Question 22, Page 13)	\$ 15,277,550.00
4. Calculate the Filing Fee and Total Amount Due (Check one of the following and enter the amount in the column to the right) <input type="checkbox"/> Line 3 is between 0 to \$1 million → Enter \$1,000.00 <input checked="" type="checkbox"/> Line 3 is between \$1million and \$50 million → Enter Line 2 x .001 <input type="checkbox"/> Line 3 is greater than \$50 million → Enter \$50,000.00	\$ 15,277.55
5. Have you submitted payment for the amount listed in Line 4 above?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

Section 2: Project Description

14. Indicate the type of facility that will be involved in the project.


FACILITY TYPE	
<input type="checkbox"/> Freestanding Birthing Center	<input checked="" type="checkbox"/> Hospital
<input type="checkbox"/> Life Plan Community	<input type="checkbox"/> Nursing or Intermediate Care Facility
<input type="checkbox"/> Freestanding Ambulatory Surgery Center	<input type="checkbox"/> Personal Care Home
<input type="checkbox"/> Home Health Agency	<input type="checkbox"/> Traumatic Brain Injury Facility
<input type="checkbox"/> Freestanding Emergency Department	
<input type="checkbox"/> Diagnostic, Treatment or Rehabilitation Center (DTRC) <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <input type="checkbox"/> Freestanding Single-Modality Imaging Center <input type="checkbox"/> Freestanding Multi-Modality Imaging Center </div> <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <input type="checkbox"/> Mobile Imaging <input type="checkbox"/> Practice-Based Imaging </div> <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <input type="checkbox"/> Other: </div>	


15. Indicate the services that will be involved or affected by this project.

SERVICES		
ACUTE	Hospital Inpatient <div style="margin-top: 10px;"> <input type="checkbox"/> Medical/Surgical <input checked="" type="checkbox"/> Open Heart Surgery <input type="checkbox"/> Pediatric <input type="checkbox"/> Obstetrics <input type="checkbox"/> ICU/CCU <input type="checkbox"/> Newborn, ICU/INT <input type="checkbox"/> Newborn/Nursery <input type="checkbox"/> Rehabilitation <input type="checkbox"/> Acute, Burn, Other Specialty <input type="checkbox"/> Long Term Acute Care <input type="checkbox"/> Inpatient, Other <input type="checkbox"/> Psychiatric/Substance Abuse, Acute Care <input type="checkbox"/> Psychiatric/Substance Abuse, Extended Care <input type="checkbox"/> Destination Cancer Hospital </div>	Diagnostic Services <div style="margin-top: 10px;"> <input type="checkbox"/> Computerized Tomography (CT) Scanner <input type="checkbox"/> Magnetic Resonance Imaging (MRI) <input type="checkbox"/> Positron Emission Tomography (PET) <input type="checkbox"/> Diagnostic Center, Cancer/Specialty </div>
		Other Outpatient Services <div style="margin-top: 10px;"> <input type="checkbox"/> Ambulatory Surgery <input type="checkbox"/> Birthing Center </div>
		Clinical/Surgical <div style="margin-top: 10px;"> <input type="checkbox"/> Emergency Medical <input type="checkbox"/> Emergency Medical, Trauma Center <input type="checkbox"/> Adult Cardiac Catheterization <input type="checkbox"/> Pediatric Cardiac Catheterization <input type="checkbox"/> Megavoltage Radiation Therapy </div>
LONG-TERM	<div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div> <input type="checkbox"/> Skilled Nursing Care <input type="checkbox"/> Intermediate Nursing Care <input type="checkbox"/> Life Plan Community </div> <div> <input type="checkbox"/> Personal Care Home <input type="checkbox"/> Traumatic Brain Injury (TBI) <input type="checkbox"/> Home Health </div> </div>	
OTHER	<input type="checkbox"/> Explain:	

16. Check the most appropriate category(ies) for this project. Check all that apply.


PROJECT CATEGORY	
Construction <input type="checkbox"/> New Facility <input type="checkbox"/> Expansion of Existing Facility <input checked="" type="checkbox"/> Renovation of Existing Facility <input type="checkbox"/> Replacement of Existing Facility	Service Change <input checked="" type="checkbox"/> New Service <input type="checkbox"/> Expansion of Service <input type="checkbox"/> Consolidation of Service <input type="checkbox"/> Relocation of Facility <input type="checkbox"/> Other
Procurement of Medical Equipment <input type="checkbox"/> Purchase <input type="checkbox"/> Lease <input type="checkbox"/> Donation (fair market value must be used)	

17. Please provide the following site information for the facility and services identified in this application. Check the appropriate box to indicate the current status of the site acquisition.  Attach the appropriate documents that provide for the Applicant's entitlement to the site at **APPENDIX D**.

 **NOTE:** If an unsigned lease is attached, include a letter documenting both parties' commitment to participate in the lease once the CON is approved.

PROJECT SITE INFORMATION		
Street Address: 710 Center Street		
City: Columbus	County: Muscogee	Zip: 31901
Number of Acres: 27.992		
Status of Site Acquisition		
<input type="checkbox"/> Purchased (attach deed)	<input checked="" type="checkbox"/> Leased (attach lease)	
<input type="checkbox"/> Under Option (attach option agreement)	<input type="checkbox"/> Under Contract (attach contract or bill of sale)	
<input type="checkbox"/> Other; please specify:		
Zoning		
Is the site appropriately zoned to permit its use for the purpose stated within the application?		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
If NO → Describe what steps have been taken to obtain the correct zoning and the anticipated date of re-zoning:		
Encumbrances		
Are there any encumbrances that may interfere with the use of the site, such as mortgages, liens, assessments, easements, rights-of-way, building restrictions, or flood plains?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

18. Provide a detailed description of the proposed project including a listing of the departments (e.g. ED, ICU), services, (e.g. Home Health, Cardiac Cath), and equipment (e.g. MRI, PET, Cath) involved.

 **NOTE:** If your description exceeds this blocked space, attach additional 8-½ by 11-inch pages, number the first sheet Page 9.1, the second Page 9.2 and so on. Do not alter the main page numbers of this application. Insert your additional pages 9.1, etc. behind this Page 9.

The Applicant

Piedmont Columbus Regional consists of two acute care hospitals (Piedmont Columbus Regional Midtown and Piedmont Columbus Regional Northside), a children's hospital (Bill and Olivia Amos Children's Hospital), a cancer center (John B. Amos Cancer Center) and over 35 physician practice locations.

The applicant, The Medical Center, Inc. d/b/a Piedmont Columbus Regional Midtown ("Piedmont Columbus" or "PCRM"), is the largest hospital in west Georgia and east Alabama. Specifically, PCRM is a 583-licensed bed regional referral center located in Columbus, Muscogee County, serving as the safety net hospital in State Service Delivery Region 8 ("SSDR 8") and providing the region's only Level II Trauma Center.

Service area residents rely on PCRM for a wide range of services, including emergency services, dedicated trauma services, pediatric emergency services, neonatal intensive care (Level III) and transport, advanced stroke care, cancer care, and cardiac care. In calendar year 2024, over 86,100 patients presented to PCRM's 57-bed emergency department for care. Given its location in west Georgia and proximity to the Alabama border, PCRM serves not only patients from Muscogee, Harris, Talbot, Marion, Chattahoochee and Stewart Counties in SSDR 8, but also patients from Lee and Russell Counties in Alabama.

Separately, the Northside campus ("Northside") is a 100-bed acute care hospital located approximately five miles from PCRM that also provides emergency services to over 42,700 patients annually from the same geographic region.

The Columbus Regional Healthcare System joined the Piedmont Healthcare System effective March 1, 2018. Piedmont Healthcare, Inc. ("Piedmont Healthcare" or "PHC") is a Georgia not-for-profit corporation that serves as the parent organization of a healthcare system based in Atlanta, Georgia. The Piedmont System is comprised of seventeen acute care hospitals and campuses, managed as five clinical hubs. In addition to the two Columbus hospitals that comprise the Columbus clinical hub, PHC includes six hospitals located in the Atlanta clinical hub, five in the Athens, Georgia clinical hub centered approximately 70 miles northeast of Atlanta, two in the Macon, Georgia clinical hub centered approximately 80 miles south of Atlanta, and, three in the Augusta, Georgia clinical hub centered approximately 160 miles east of Atlanta.

As part of PHC, the Columbus region now enjoys the cardiovascular expertise, innovation and support of the Piedmont Heart Institute, a nationally recognized heart center of excellence. Recent recognitions include, without limitation, the following:

- Piedmont Atlanta was named Healthgrades America's 100 Best Hospitals for Cardiac Care, America's 50 Best Hospitals for Cardiac Surgery, America's 100 Best Hospitals for Coronary Intervention, and Cardiac Surgery Excellence.
- Piedmont Atlanta was named one of the Nation's 50 Top Cardiovascular Hospitals by Fortune and IBM Watson Health.
- U.S. News ranked Piedmont Heart at Piedmont Atlanta the top hospital in Georgia for cardiology and heart surgery.
- Piedmont Atlanta was the first adult ECMO program in the state of Georgia to be awarded Center of Excellence designation from The Extracorporeal Life Support Organization (ELSO).
- Piedmont received 14 American Heart Association Get With The Guidelines and Mission: Lifeline achievement awards for demonstrating commitment to following up-to-date, research-based guidelines for the treatment of heart disease and stroke.
- Piedmont Atlanta and Piedmont Athens earned the Women's Choice Award for the best hospitals for heart care in Georgia.

- Piedmont Atlanta earned an elite three-star rating and Piedmont Athens a strong two-star rating from the Society of Thoracic Surgeons and the American College of Cardiology for patient care and outcomes in TAVR.
- Piedmont Athens was named among PINC AI Nation's Top 50 Cardiovascular Hospitals.
- Piedmont Augusta earned Healthgrades America's 50 Best Hospitals for Vascular Surgery Award.
- Piedmont Fayette named Healthgrades America's 100 Best Hospitals for Coronary Intervention.
- Piedmont Macon earned American Heart Association: The Mission Lifeline Gold for NSTEMI.
- Performance Achievement Awards from the ACC NCDR Chest Pain-MI Registry: Piedmont Newton received Platinum; Piedmont Fayette received Platinum; Piedmont Augusta received Gold.

Since March 2018, Piedmont Healthcare and its Foundation have committed and spent over \$200 million in various investments to improve healthcare delivery in the Columbus area. These include, without limitation:

- Significant renovation and expansion of nearly \$60 million to increase PCRM's intensive care unit ("ICU") space to house 43 ICU beds, tentatively scheduled to be completed in April 2026;
- Opening of the \$28 million Bill and Olivia Amos Children's Hospital in 2024;
- The opening of a new state-of-the-art 12,000 square foot emergency department at Northside;
- The renovation and expansion of the Miracle Neonatal Intensive Care Unit ("NICU") at PCRM with Level II and III NICU services in a family-friendly layout with enhanced privacy;
- The 48,000 square foot expansion and renovation of the John B. Amos Cancer Center;
- The \$30+ million investment to convert PCRM and Northside to the Epic electronic health records system used in all Piedmont facilities, including physician practices to allow medical care teams to have real-time access to the patient's medical information, including test results, charts, reports, and images.
- The recruitment of new physicians to the community and expansion of the Columbus Regional Medical Group, including adding new physicians and specialties like Endocrinology and ENT and expanding geographic access to physician services.

The proposed project represents PHC's latest investment in the Columbus region.

The Proposed Project

PCRM is a long-time provider of cardiac services, including operating a therapeutic cardiac catheterization program (including percutaneous coronary intervention ("PCI")) for over a decade under the CON exemption that allows certain therapeutic cardiac cath procedures to be performed without on-site open heart surgery back up. PCRM is caring for an increasing number of patients in need of open heart surgery services and high-risk, complex therapeutic procedures that are optimally performed at a hospital with on-site open heart surgery ("OHS") back-up available. PCRM proposes to establish an adult OHS program to improve timely access to cardiovascular surgery, and remedy numerous atypical barriers to care encountered by service area residents, including residents who rely on PCRM for their cardiac and emergency health needs.

PCRM's Georgia service area currently is served by only a single OHS provider, which is a low volume OHS provider that offers OHS services sporadically with temporary (*i.e.*, locum tenens) physicians rather than full-time, dedicated cardiovascular surgeons. Other complex or higher risk cardiac-related procedures are not offered 24/7 or urgently. Rather, such services may be offered only on designated (*i.e.*, scheduled) days/times. Given the unreliability of services offered at the only Georgia OHS provider in its Georgia service area, PCRM too frequently must transfer its cardiac patients to OHS programs outside of the community for open heart surgery, including coronary artery bypass grafts (CABG), high risk PCI, or other high risk or complex interventions.

For calendar year 2025 ("CY 2025") alone, PCRM is projected to refer to an OHS provider approximately 168 cardiac patients who originally presented to PCRM for care and treatment. Based on past experience, too many of these patients have been and will continue to be critical patients requiring immediate transport for urgent or emergent care.

The absence of a reliable, comprehensive, fully functional local OHS provider requires PCRM to transfer patients from Columbus to metropolitan Atlanta area OHS providers such as Piedmont Atlanta, Emory University Hospital, and Emory St. Joseph's Hospital, which are located over 100 miles away. This is suboptimal from a quality of care perspective.

Drive times alone from PCRM to the closest Atlanta area hospitals are approximately two hours, which does not include transport times such as the time to arrange for a receiving hospital to accept the transfer, confirm or await bed availability, and other transfer logistics that delay care. Thus delays in care are not limited to the time and distance of travel between Columbus and Atlanta, but also to a variety of other time-sensitive, transport related variables such as the weather and ability for helicopters to fly; availability of emergency ground transport teams capable of transporting cardiac patients if air transport is not available; ability of teams to provide extracorporeal membrane oxygenation ("ECMO") support for patients; and the availability of needed resources at the receiving hospital (e.g., a cardiovascular intensive care ("CVICU") bed, OHS operating room and team, or cardiac catheterization ("cardiac cath") lab). In some cases, attempted transfers to the existing service area OHS provider has caused additional delays while awaiting confirmation that the OHS provider would be staffed, equipped or otherwise capable of providing the service.

It is well recognized clinically that "time is muscle" for many patients experiencing a heart attack or other serious cardiac event, and, unfortunately, delays in transferring PCRM patients to an open heart provider capable of meeting patients' needs can and does lead to worsening conditions and even deaths of PCRM patients. Piedmont Columbus proposes to address these and other impediments by offering a comprehensive open heart surgery program with experienced staff and dedicated, full-time cardiovascular surgeons that are part of and enjoy the support of the nationally-recognized Piedmont Heart Institute.

This project not only will reduce delays in care, but also will reduce costs and improve continuity of care. Patients and payors will not need to incur costly air or ground transportation. Instead, the patient will be able to remain at the hospital s/he chose for his/her care with immediate access to the patient's medical history. Costs to families and caregivers will be reduced because they will not have to travel and likely remain in Atlanta for the duration of their loved one's inpatient hospital stay.

Georgia Department of Public Health ("DPH") Chronic Disease Prevention Section ("CDPS") recently selected Muscogee County as one of the state's neediest for cardiovascular health outreach and education to prevent and manage cardiovascular disease ("CVD") in high-burden communities. The GDPH's primary criterion for selection of counties for the Heart Health Initiative was hypertension prevalence with secondary criteria for selection including social vulnerability index, lack of health insurance as a barrier to access to care, and stroke prevalence.

Piedmont Columbus is an active partner in the DPH's *Columbus Heart Health Collaborative* which started in January 2025, and has among its goals to:

- Increase access to primary care and address barriers to prevention, early intervention, and treatment of hypertension and related risk factors; and,
- Increase community-wide knowledge and adoption of heart-healthy behaviors and lifestyle modifications, including healthy eating, physical activity, and stress management.

The proposed Piedmont Columbus OHS program also will ensure that all patients, including financially needy patients, receive timely OHS services regardless of ability to pay. PCRM is making an indigent and charity care commitment (3% of adjusted gross revenues for its OHS program), which will improve financial accessibility of care. Additionally, based on GDDS data, only 2.7% of OHS patients at Emory St. Francis Hospital ("St. Francis"), the sole OHS provider in the region, were Medicaid beneficiaries (2024). In contrast, based on the payor mix of patients PCRM refers to OHS programs and other referral patterns, PCRM anticipates that 8.5% of its OHS program patients will be Medicaid beneficiaries. Piedmont Columbus thus projects to serve over three times (3x) the Medicaid OHS patients as a percentage of total OHS cases than St. Francis.

Piedmont Columbus' ability to provide the full array of interventional cardiac services to the communities it serves, and to do so in a manner that ensures health equity, is supportive of and consistent with the goals of the Department of Public Health Chronic Disease Prevention Section's *Columbus Heart Health Collaborative*.

The total project costs are \$15,277,550, which will be funded by PHC. Piedmont Columbus will implement the OHS program by converting four existing operating rooms ("ORs") to two (2) open heart surgical services operating rooms ("CVORs") with associated CVOR support space, which involves approximately 1,900 square feet of renovations. The hospital will utilize existing pre-operative and post-operative areas for OHS patients, including six (6) intensive care unit ("ICU") beds that will become operational by April 2026 under CON Project No. 2023-013 (upgrade, renovate, and expand ICU). The six ICU beds will be equipped, staffed, and function as CVICU beds. The hospital's existing cardiac cath labs are capable of providing high-risk/complex cardiac cath/PCI procedures such as catheter atherectomy, percutaneous transluminal coronary angioplasty ("PTCA"), and transeptal catheters that require on-site OHS back up. Likewise, Piedmont Columbus will utilize existing rehabilitation space to accommodate cardiac rehabilitation services for its OHS patients.

Piedmont Columbus anticipates initiation of OHS services for its patients by April 1, 2027.