

March 17, 2023

Sandra Davis Clerk of Council 6th Floor Government Center Tower 100 10th Street Columbus, Georgia 31901

RE: Certificate of Need Application – Piedmont Columbus Regional Midtown Upgrade and Reconfiguration of Inpatient Beds

Dear Ms. Davis:

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 upgrade and reconfigure its ICU rooms and associated areas. The application will be filed on March 17, 2023.

This copy is filed pursuant to Rule 111-2-2-.06(5)(b)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:"

M. Scott Hill

Chief Executive Officer

Piedmont Columbus Regional

Section 2: Project Description

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

FACILITY TYPE					
☐ Birthing Center	Hospital				
☐ Continuing Care Retirement Community (CCRC)	☐ Nursing or Intermediate Care Facility				
☐ Freestanding Ambulatory Surgery Center	☐ Personal Care Home				
☐ Home Health Agency	☐ Traumatic Brain Injury Facility				
☐ Freestanding Emergency Department					
	Freestanding Multi-Modality Imaging Center Practice-Based Imaging				

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

	SERV	ICES		
	Hospital Inpatient	Diagnostic Services		
	☐ Medical/Surgical☐ Open Heart Surgery☐ Pediatric	 □ Computerized Tomography (CT) Scanner □ Magnetic Resonance Imaging (MRI) □ Positron Emission Tomography (PET) 		
	☐ Obstetrics	☐ Diagnostic Center, Cancer/Specialty		
	■ ICU/CCU □ Newborn, ICU/INT	Other Outpatient Services		
ACUTE	□ Newborn/Nursery□ Rehabilitation□ Acute, Burn, Other Specialty	☐ Ambulatory Surgery☐ Birthing Center		
`	☐ Long Term Acute Care	Clinical/Surgical		
	☐ Inpatient, Other	☐ Emergency Medical		
	Psychiatric, Adult	☐ Emergency Medical, Trauma Center		
	Substance Abuse, Adult	Adult Cardiac Catheterization		
	☐ Psychiatric, Child/Adolescent	Gamma Knife		
	Substance Abuse, Child/Adolescent	Lithotripsy		
	☐ Psychiatric, Extended Care	Pediatric Cardiac Catheterization		
	☐ Destination Cancer Hospital	☐ Megavoltage Radiation Therapy		
ம் Σ	☐ Skilled Nursing Care	☐ Personal Care Home		
LONG- TERM	☐ Intermediate Nursing Care	☐ Traumatic Brain Injury (TBI)		
ן ב	☐ Continuing Care Retirement Community (
отнек	☐ Administrative Support ☐ Non-Patient Care, Other	☐ Grounds/Parking ☐ Medical Office Building		
ОТНЕ				

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

PROJECT CATEGORY				
Construction	Service Change			
☐ New Facility	☐ New Service			
Expansion of Existing Facility	☐ Expansion of Service			
Renovation of Existing Facility	☐ Expansion or Acquisition of Service Area			
☐ Replacement of Existing Facility	☐ Consolidation of Service			
Procurement of Medical Equipment	□ Relocation of Facility			
Purchase	☐ Other			
□ Lease				
☐ 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, if applicable.

PROJECT SITE INFORMATION							
Street Address: 710 Center Street							
City: Columbus County: Muscogee Zip: 31901							
Number of Acres: 27.992							
Status of Site Acquisition	Status of Site Acquisition						
☐ Purchased (attach deed) ☐ Leased (attach lease)							
☐ Under Option (attach option agreement) ☐ Under Contract (attach contract or bill of sale)							
Other; please specify:							
Zoning							
Is the site appropriately zoned to permit its use for the purpose stated within the application?							
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 wassessments, easements, rights-of-way, building to	vith the use of the site, such as mo restrictions, or flood plains?	rtgages, liens,	☐ YES ■ NO				

Question #18 response: 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.

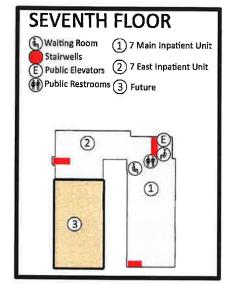
The Medical Center, Inc. d/b/a Piedmont Columbus Regional Midtown (PCRM) is a 583-licensed bed hospital in Columbus, Muscogee County. PCRM is the largest hospital in State Service Delivery Region (SSDR) 8, and is a safety net hospital as defined by the Department's Short-Stay General Hospital Bed Rules. PCRM is the region's only Level II Trauma Center, providing care for critically injured adults and children. The Emergency and Trauma Center is one of the busiest trauma centers in Georgia. In addition to emergency and trauma services, PCRM provides critical and intensive care to adults recovering from other medical and surgical conditions.

With this project, PCRM seeks to upgrade and renovate its ICU and other medical-surgical units that support its role as an Emergency and Trauma Center in our region. This project will consolidate the multiple ICU units that are located across the hospital in multiple areas and floors. The project proposes to consolidate the 3 ICU areas into 2 floors, which will result in the addition of a new wing plus the expansion and "right sizing" of the ICU rooms. In addition, the project will renovate and update 3 floors of the Med/Surg Unit resulting in more patient friendly rooms for our patients.

			ICU Bed Co	nsolidatio	n
	Existing Location	# Beds	Future Location	# Beds	Construction Type
	7 Main/East (ICU)	16	7 Main/East ICU	21	Aesthetic/Structural: 7 East Wing renovation and new construction (expand East Wing)
	8 Main/West (ICU)	16	6 Main/East ICU	22	Aesthetic/Structural: 6 East Wing renovations
	10 Main/West (ICU)	6			
Total		38		43	

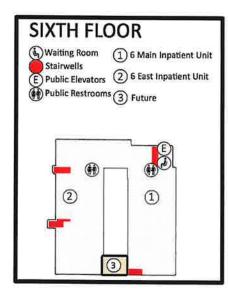
	Existing Location	# Beds	Future Location	# Beds	Construction Type
	5 Main/West	34	5 Main/West	25	Aesthetic/Minimal Changes to Core: 5 Main renovations
	6 Main/West	32	6 Main/West	16	Aesthetic/Structural: 6 Main renovations
	5 Main/East	0*	5 Main/East	28	Aesthetic/Structural: 5 East renovations
	6 Main/East	41	6 Main/East	D	(See above for ICU conversion)
Total		107		69	

Proposed/Renovated Areas:



• 7th Floor (New East Wing) – Expansion and renovation of the 7th floor, which will create a new east wing. The new East Wing will expand and consolidate a portion of the existing ICU services. The current 16 bed ICU unit located on the 7th floor is outdated, under-sized and inadequate to support family members. Therefore, the floor will be reconfigured to include an expanded ICU area created by both the new wing as well as the reconfiguration of the existing ICU area. The new area will include 21 ICU beds – 16 ICU beds currently located on the 7th floor plus 5 ICU Beds that will be relocated from the 10th floor. This new

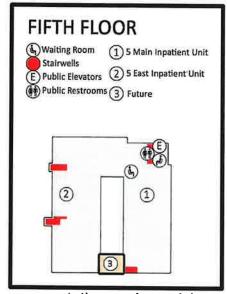
wing and reconfigured space will create larger family centered ICU rooms that will enhance quality and patient experience by enlarging the patient room. The new wing will also include the required support space, decentralized team collaboration space and patient lifts in each room. It will also have in-room computers for bed-side charting, patient monitoring, new ICU beds, nurse call system and headwalls.



• 6th Floor (East Wing) - Renovation of the existing wing will create a 22 ICU bed unit. The current ICU unit will be relocated from the 8th and remainder of the 10th floor. The existing 39 med/surg beds on this wing will be re-distributed across the hospital as needed. Planning is still underway for the vacated space on the 8th floor, but any appropriate regulatory filings will be made prior to use. The new ICU space will be similar to the reconfigured ICU space on the 7th floor and will be reconfigured to create larger family centered ICU rooms. In order to support the larger rooms, the east and west wing of the 6th floor will be connected

via a new hallway. The renovation will also include the creation of required support space and team collaboration space. Each inpatient room will also have in-room computers for bed-side charting, patient monitoring, new ICU beds, patient lifts, nurse call system and headwalls.

 6 Floor (Main Wing) - Renovation of existing space, which will convert 32 inpatient med/surg beds to 16 med/surg beds. The converted rooms will be flexible care to support varying levels of care in the future and allow for more efficient and higher quality of care. The renovation will result in the loss of 9 med/surg beds on this unit, but will also create new support and team collaboration space.



- 5th Floor (East Wing) Renovation and aesthetic upgrade to the space that formerly housed the pediatric to a 28-bed med/surg unit. The pediatric beds were previously approved for relocation to the new Children's Hospital in CON2022-049. Each room will include bedside charting and a new nurse call system. Additionally, to support more efficient operational flow, a new hallway will be created to connect the east and west wing
- 5th Floor (Main Wing) Renovation, aesthetic upgrades and modifications to the support space to create an adequately sized medication room,

nurse station and nourishment space. The south corridor will be renovated to include office space, centralized equipment and distribution space, patient transport offices, staff respite area, and PIC Team centralized location, plus a lactation space and supply closet. In order to reconfigure the space to create adequate support space, the until will be reduced from 34 med/surg beds to 25 med/surg beds.

This project will not involve the addition of any new inpatient beds or services. Upon completion of this project, the PCRM CON-authorized capacity will remain at 583 beds.

The proposed project will require the renovation of 68,015 square feet of existing space at \$321.30 per square foot. New construction will consist of 14,830 square feet of space at \$428 per square foot. The total project costs are estimated at \$45,840,002.

Section 3: General Review Considerations

All Certificate of Need applications are evaluated to determine their compliance with the general review considerations contained in Rule 111-2-2-.09. Please document how the proposed project conforms with the following general review considerations.

Rule 111-2-2-.09(1)(a): Consistency with State Health Plan

The proposed new institutional health service is reasonably consistent with the relevant general goals and objectives of the State Health Plan.

- 19. Explain how the project is consistent with the State Health Plan or why it does not apply. Also explain how the application is consistent with the Applicant's own long range plans.
 - NOTE: If your explanation exceeds this blocked space, attach additional 8-1/2 by 11-inch pages, number the first sheet Page 10.1, the second Page 10.2 and so on. Do not alter the main page numbers of this application. Once printed, insert your additional pages 10.1, etc. behind this Page 10.

However, the improvements it will update surgical units will allow for	e project is consisted in the delivery of head and modernize the end to help ensure service the right-sizing of Given these objectives	nt with the overridin althcare services to the nvironment of care in es are offered in an er our ICU units to cre	g objectives of the e residents of PCRM's the ICU units at PCRI fficient and economica eate a more family-c	ted to space renovations. Plan in that it promotes service area. Specifically, of and associated medical/ I manner. This renovation entered and staff-efficient goals and objectives of the
				2

1Project Overview

The Medical Center, Inc. d/b/a Piedmont Columbus Regional Midtown (PCRM) is an existing 583-licensed bed hospital located in Columbus, Muscogee County. PCRM is the largest hospital in State Service Delivery Region (SSDR) 8 and is a safety net hospital as defined by the Department's Short-Stay General Hospital Bed Rules. PCRM is the region's only Level II Trauma Center, providing care for critically injured adults and children. PCRM operates one of the busiest Emergency Departments ("ED") in Georgia with 80,000 ED visits in 2021 and 85,741 ED visits in 2022. In addition to emergency and trauma services, PCRM provides critical and intensive care to adults recovering from various medical and surgical conditions.

Through this project, PCRM seeks authorization to incur capital expenditures to construct, upgrade, renovate and relocate its ICU and other medical-surgical units that support its role as a regional Emergency and Trauma Center. The proposed capital expenditure is the result PCRM's thorough and thoughtful planning to enhance its services in compliance with the general goals and objectives of the State Health Plan and to ensure quality health care services are provided to all citizens in a cost-effective and well-planned manner. The proposed project will lead to enhanced privacy, safety, and access to hospital services, and better operation and utilization of PCRM's existing CON-authorized beds.

The project is needed to improve patient care and relieve inefficiencies and operational constraints caused by the current fractured locations of various ICU and medical-surgical units within the main hospital building. As outlined below, PCRM seeks to consolidate 38 existing ICU beds currently located on separate floors into upgraded, sufficiently sized spaces on two floors with a total of 43 ICU beds. In addition, the project will renovate, consolidate, and update 2 floors with a total of 69 existing CON-authorized general medical-surgical beds.

During peak times, including the COVID-19 state of emergency, the hospital operated up to forty-three (43) ICU beds. Currently, PCRM has set up and staffed thirty-eight (38) ICU beds on three (3) different floors. The existing layout of ICU beds is inefficient and insufficient for maintaining supplies and equipment. Additionally, the layout creates confusion and is suboptimal for staff and patient access. PCRM determined that its ICU beds would be more efficiently utilized if forty-three (43) ICU beds were consolidated between two (2) separate larger area floors with upgraded units and more space for patients, family, and staff. The consolidation and relocation of ICU beds will vastly improve quality of care and operational efficiencies, enhance communication, and provide improved comfort for patients, visitors, physicians, and staff.

The proposed capital expenditure project also includes the relocation and reconfiguration of 69 existing medical surgical beds between two (2) floors. The project involves updates to patient care units. The project will offer improved privacy, safety, and comfort for patients, thereby enhancing quality of care and overall patient experience. Among other benefits, the project will enable PCRM to convert semi-private medical-surgical rooms to state-of-the art private patient rooms. The conversion of semi-private rooms improves

State of Georgia: Certificate of Need Form CON 100 Revised May 20221 infection control (minimizing both airborne and contact transmission routes) and enhances patient privacy and comfort. Single-patient rooms not only reduce infection risks, but also reduce lengths of stay, thereby reducing costs for patients, payors, and the hospital. Additionally, private rooms enhance patient flow.

Below is a summary of the hospital areas involved in the proposed project:

			ICU Bed Co	onsolidatio	n
	Existing Location	# Beds	Future Location	# Beds	Construction Type
	7 Main/East (ICU)	16	7 Main/East ICU	21	Aesthetic/Structural: 7 East Wing renovation and new construction (expand East Wing)
	8 Main/West (ICU)	16	6 Main/East ICU	22	Aesthetic/Structural: 6 East Wing renovations
	10 Main/West (ICU)	6			
Total		38		43	

	Med Surg Bed Renovations and Reconfiguration						
	Existing Location	# Beds	Future	# Beds	Construction Type		
			Location				
	5 Main/West	34	5 Main/West	25	Aesthetic/Minimal Changes to Core: 5 Main		
					renovations		
	6 Main/West	32	6 Main/West	16	Aesthetic/Structural: 6 Main renovations		
	5 Main/East	0*	5 Main/East	28	Aesthetic/Structural: 5 East renovations		
	6 Main/East	41	6 Main/East	0	(See above for ICU conversion)		
Total		107		69			

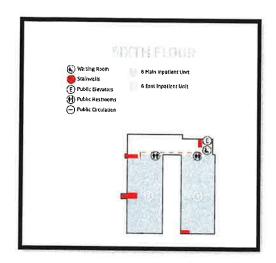
^{*} CON Project No. 2022-049 authorized the relocation of 29 pediatric med/surg beds from 5 East to the former Doctor's Specialty Hospital building.



• 7th Floor (New Expanded East Wing)

The existing 7th floor Main/West Wing currently houses the John B. Amos Inpatient Oncology Center. Sixteen (16) ICU beds are currently located on a smaller existing East Wing. The current ICU units are outdated and limited in space. PCRM proposes expanding and renovating the 7th floor smaller East Wing. Construction includes a newly expanded 7th floor East Wing and will include a total of 21 ICU beds in a new unit. The 21 ICU beds will include the 16 existing ICU beds relocated from the 5th floor and 5 additional ICU beds. The 21 ICU beds will be larger - centering on family participation - and will include new beds, patient lifts, in-room computers for bed-side charting, patient monitoring, nurse call system,

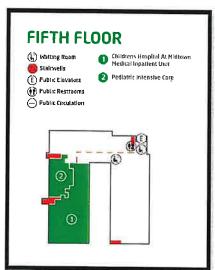
and headwalls. The newly expanded 7th floor East Wing will also include an ICU support area and decentralized team collaboration space.



6th Floor (East Wing) - The 6th floor East Wing currently includes 41 medical-surgical beds. PCRM proposes renovating the existing 6th floor East Wing to create a 22 bed ICU unit. The 22 ICU units will be comprised of 16 existing ICU units relocated from the 8th floor Main/West Wing and 6 existing ICU units from the 10th floor Main/West Wing. The new ICU space and units will be similar to the reconfigured ICU space on the 7th floor expanded East Wing. The ICU units will include new beds, patient lifts, in-room computers for bed-side charting, patient monitoring, nurse call system, and headwalls. The 6th floor East Wing will also include an ICU support area and decentralized team collaboration space. To support the larger rooms,

improve access to ancillary services, and minimize travel distance, the east and west wing of the 6th floor will be connected via a new hallway.

6th Floor (Main/West Wing) - The 6th floor Main/West Wing currently houses 32 medical-surgical beds. PCRM proposes renovating the existing space to include 16 beds. The renovated rooms will be larger, more patient friendly, and include state-of-the-art computers for bedside charting, nurse call systems and headwalls. The renovation also includes the conversion of semi-private rooms to private rooms, which has numerous benefits as described above. The renovation also allows for the development of a new support area and team collaboration space.



5th Floor (East Wing) - The 5th floor East Wing housed a 41-bed pediatric medical surgical unit. In accordance with CON Project No. 2022-049, the pediatric beds will be relocated out of the main hospital building. PCRM proposes renovating the 5th floor East Wing to include 28 medical-surgical beds. The stateof-the-art medical-surgical units will include computers for bedside charting, nurse call systems and headwalls. The renovation also includes the conversion of semiprivate rooms to private rooms, which has numerous benefits as described above. The renovation also allows for the development of a new support area and team collaboration space.

5th Floor (Main/West Wing) - The 5th floor Main/West Wing currently includes 34 medical surgical beds. PCRM proposes renovating the 5th floor Main/West Wing to include 25 The state-of-the-art medical-surgical units will include

State of Georgia: Certificate of Need Form CON 100 Revised May 20223

medical-surgical beds.

computers for bedside charting, nurse call systems and modifications to existing headwalls. The renovation also includes the conversion of semi-private rooms to private rooms, which has numerous benefits as described above. Additionally, renovations include aesthetic upgrades and modifications to the support space to create an adequately sized medication room, nurse station, and nourishment space. The south corridor of the 5th floor will be renovated to include office space, centralized equipment and distribution space, patient transport offices, a staff respite area, PIC Team centralized location, a lactation space and supply closet.

The project will not involve the addition of any new inpatient beds. All beds involved in the relocations, consolidation, and upgrades fall within the hospital's existing CON-authorized bed capacity. Upon completion of this project, PCRM's CON-authorized capacity will remain at 583 beds. Additionally, PCRM's proposed project does not involve the addition of any new clinical health services or the acquisition of any diagnostic or therapeutic equipment.

The proposed project requires the renovation of 68,015 square feet of existing space in the main hospital building at an estimated cost of \$321.30 per square foot. New construction will consist of 14,830 square feet of space in the main hospital building at an estimated cost of \$428 per square foot. Additional project costs include architectural and engineering fees of \$2,134,571, fixed equipment costs of \$3,390,000, moveable equipment costs of \$7,910,000, and a contingency of \$3,955,059. The total project costs are estimated to be \$45,840,002.

PCRM filed its Letter of Intent for this project, which the Department assigned as LOI 2023-010, on February 15, 2023.

Background .

Piedmont Columbus Regional Midtown

PCRM is the largest hospital in SSDR 8. As a tertiary center and safety net hospital, it offers comprehensive inpatient and outpatient services to the community and provides high levels of indigent and charity care. The hospital features a regional Level II Trauma Center and is one of only six perinatal centers in the state with a Level III Neonatal Intensive Care Unit and a full-service pediatric intensive care unit. It operates an extremely busy Emergency Department, which experienced over 80,000 patient visits in 2021 and 85,741 ED visits in 2022. Additionally, PCRM has been home to a Family Practice residency program since 1972. The nationally recognized program, which was the first of its kind in Georgia and one of the first in the Southeast, has graduated over 500 family physicians. Finally, PCRM operates the Children's Hospital (as a department of PCRM), one of the only comprehensive inpatient pediatrics programs in South Georgia. By any measure, PCRM is a fundamental component of the existing health care continuum in both its service area and the larger Southeast Georgia region and is thus a critical component of the community it serves.

In March of 2018, PCRM affiliated with Piedmont Healthcare, Inc. (PHC) through a process of member substitution, and it became a part of the largest hospital system in the state. Prior to the PHC affiliation, PCRM (then known as Midtown Medical Center) was consolidated with the adjacent Doctors Specialty Hospital pursuant to DET 2013-157. At the time of the consolidation, Doctors Specialty Hospital was an acute care hospital with 220 CON-authorized beds. Prior to consolidation, both hospitals were owned by the Medical Center Hospital Authority. Upon consolidation, the 220 CON-authorized beds at Doctors Specialty Hospital were added to the Midtown Medical Center license. The campus and buildings on the adjacent Doctors campus became part of the Midtown Medical Center campus. In accordance with CON Project No. 2022-049, the Children's Hospital at PCRM will be relocated into the former main Doctors Specialty Hospital building. The 583-bed tertiary hospital that emerged from the consolidation is the largest hospital in SSDR 8 and the larger Southeast Georgia region and is the cornerstone of the regional healthcare continuum.

In addition to providing acute hospital services to residents of SSDR 8, PCRM is intimately involved in the community and conducts numerous community outreach activities designed to improve the health of the community it serves. An example of this commitment is PCRM's Community Health Needs Assessment (CHNA). PCRM undertakes a new CHNA planning process every 3 years in order to identify, prioritize and address the unique health needs of the community. The focus of the CHNA is on the most vulnerable individuals in the community: those with limited or no income, the uninsured and underinsured, those with chronic health conditions and those with challenges accessing healthcare services. Additionally, the CHNA is designed to examine the particular issues and health challenges facing the community at large.

The current CHNA was approved in 2019 and covers the years 2020, 2021, and 2022. In developing the CHNA, PCRM used a combination of community input and data to identify the top priorities that the hospital would address for the 3-year time span. The chosen priorities were recommended by the community benefit department with sign-off from hospital and board leadership. The following criteria were used to establish the priorities:

- The number of persons affected;
- The seriousness of the issue;
- Whether the health need particularly affected persons living in poverty or reflected health disparities; and
- > Availability of community and/or hospital resources to address need.

The following are the selected priorities PCRM identified in the current CHNA.

➤ Increase access to appropriate and affordable health care for all community members, and especially those who are low income and/or uninsured.

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- Decrease deaths from cancer and increase access to cancer programming for those living with the disease.
- > Decrease preventable instances of diabetes and decrease the number of patients with uncontrolled diabetes.
- > Reduce rates of obesity and increase access to healthy foods and recreational activities.
- Decrease the impact of and deaths from stroke.
- > Reduce opioid and related substance abuse and overdose deaths.

The current PCRM CHNA is provided as part of Appendix N.

Piedmont Healthcare, Inc.

PCRM is part of Piedmont Healthcare, Inc., (PHC) which is the largest not-for-profit healthcare system in Georgia. Piedmont Healthcare includes seventeen (17) hospitals organized in five (5) "clinical hubs":

Atlanta Clinical Hub

- Piedmont Atlanta (tertiary flagship)
- Piedmont Fayette
- > Piedmont Mountainside
- > Piedmont Newnan
- Piedmont Henry
- ➢ Piedmont Rockdale
- > Piedmont Eastside
- ➢ Piedmont Cartersville

Athens Clinical Hub

- Piedmont Athens Regional (tertiary flagship)
- Piedmont Newton Hospital
- Piedmont Walton Hospital

Macon Clinical Hub

- Piedmont Macon (tertiary flagship)
- Piedmont Macon North

Columbus Clinical Hub

- Piedmont Columbus Regional Midtown (tertiary flagship)
- Piedmont Columbus Regional Northside

Augusta Clinical Hub

- Piedmont Augusta Hospital (tertiary flagship)
- Piedmont McDuffie Hospital