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November 11, 2024

Eric N. Baker
Program Manager
Maryland Health Care Commission
4160 Patterson Avenue
Baltimore, MD 21215

**Re: SurgCenter at National Harbor, LLC dba Harborside Surgery Center
Certificate of Need Application To Establish an Ambulatory Surgery
Facility: Docket No. 24-16-2470
Response to November 4, 2024 Letter Seeking Additional Information**

Dear Mr. Baker:

On behalf of SurgCenter at National Harbor, LLC dba Harborside Surgery Center ("Harborside"), we are responding to your November 4, 2024 letter (the "November 4 Letter") seeking information regarding a planned change in the physicians using the Harborside ambulatory surgery center described in the certificate of need ("CON") application requesting approval for Harborside to operate as an ambulatory surgical facility ("ASF") with three operating rooms and two procedure rooms through the conversion of one procedure room to an operating room.

The November 4 Letter follows up on our October 31, 2024, email notifying the MHCC that, as an ASC-2, changes among the physicians using Harborside are planned:

1. Certain physician owners are departing: Andrew Wolff, M.D., Nitin Goyal, M.D., and Jeffrey Lovallo, M.D. Their percentages of ownership in Harborside (totaling 9.27%) will be added to the 51% percentage currently owned by M2 Orthopedic Partners Holdings which will acquire the ownership interests of these three departing physicians (using two wholly-owned subsidiaries, i.e. M2 Surgery Holdings, LLC and M2 Surgery SPV, LLC). The result will increase the M2 Orthopedic Partners Holdings ownership to 60.27% of Harborside.

2. The following additional physicians will use the ASC but not be owners: John Huffman, M.D., Talal Ghazal, M.D., Adam Pickett, M.D. and Mihir Sheth, M.D.

As illustrated by the updated information we are supplying in this response to the November 4 Letter, we have not considered the update to be material. No new owners are being added, the types of cases are not changing and of the departing physician owners only Dr. Wolff has small volumes which will be made up by volumes from the four additional non-owner physicians. Drs. Goyal and Lovallo have not had recent volumes and were not considered in the original tables on need and impact.

Following is our specific response to the November 4 Letter:

Question 1. The list of owners and their percentage ownership from page 21 of the application.

Response:

Attachment 1 is the requested list of owners and their percentages reflecting the planned update.

Question 2. Table 6 with the operating room capacity and needs assessment from page 40.

Response:

Tables 6 and 7 estimate the need for operating rooms on the basis of the State Health Plan formula. The data inputs are Total Cases and Total Surgical Minutes and are taken from Table 1 in the financial schedules.

Harborside's Projections did not change materially with the departure of Dr. Wolff and the addition of the new physicians. The departure of Dr. Goyal and Dr. Lovallo as physician owners is not relevant to the assessment of operating room capacity and need nor impact as these two physicians did not have historical volumes in 2023 and were not shown on the Table of Historical and Projected operating room and procedure room cases provided with Attachment 17 (which is based on Tables 11 and 14 and updated with the August 1, 2024 completeness response). Thus, only Dr. Wolff's small volumes among the departing physicians reflect a minor diminution of projected volumes.

As for the additional four non-owner physicians projected to use the facility, Dr. Pickett and Dr. Sheth are new to private practice as Dr. Pickett is leaving military service and Dr.

Sheth recently completed a fellowship and as a result have low projected surgical volumes. Dr. Ghazal and Dr. Huffman have an existing practice and are projected to have low surgical volumes at Harborside.

Attachment 2 is a revised Table 6. Table 6 identifies the operating room capacity and needs assessment for the entire facility. It continues to show that there is a need for three operating rooms based on the projected utilization.

Question 3. Table 7 on the project only operating room capacity and needs assessment from page 42.

Response:

Attachment 3 is a revised Table 7. Table 7 identifies the operating room capacity and needs assessment for the project. It continues to show that there is a need for three operating rooms based on the projected utilization. These projections did not change materially with the departure of Dr. Wolff and the addition of the new physicians.

Question 4. Table 10 on the projected cases shift from other facilities from page 45.

Response:

Attachment 4 is a revised Table 10. Table 10 is a summary of the data in Table 14.

A shift of volumes associated with the addition of four physicians was estimated and all four are projected to have low volumes. The impact of Harborside's third operating room will remain small as projected in the application.

Question 5. An update of the projected cases and volume by physician. This includes Tables 11, 12, and 13 from pages 52 through 54.

Response:

Attachments 5, 6 and 7 are revised Tables 11, 12 and 13. Tables 11 and 12 present the projected volume of surgical cases and surgical procedures by individual surgeon during the years 2024 through 2028. The revised tables exclude the anticipated volumes of Dr. Wolff and include projections for the four incoming physicians. The final panels of Tables 11 and 12 show the net impact of the change in the roster of physicians. The net effect is a small increase in projected volumes. On Table 13, Dr. Pickett and Dr. Sheth do not appear because they do not have historical volumes for the reason explained in the response to Question 2 concerning their new entry into private practice.

Question 6. Table 14 must be amended to include the projected volumes for the four new staff members for the years 2025, 2026 and 2027. This existing information is on pages 55 and 56 of the application.

Response:

Attached as Attachment 8 is a revised Table 14, showing the small net change in projected volumes.

Question 7. Likewise, Table 15 should be amended to include the projected volumes for the four new staff members for the years 2025, 2026 and 2027. This existing information is on page 57 of the application.

Response:

Attachment 9 is an updated Table 15, showing the small net change in projected volumes. On Table 15, Dr. Pickett and Dr. Sheth do not appear because they do not have historical volumes for the reason explained in the response to Question 2 concerning their new entry into private practice.

Question 8. Based on the updated volumes, the CON table set must be updated. This includes revised Tables 1 and 2, on the statistical projections for the entire facility and the proposed project need to be updated.

Response:

The revised physician roster resulted in a request for an update set of projections in Tables 1 and 2. These are provided in Attachments 10 and 11.

Question 9. This also includes Tables 3 and 4, the revenue and expense tables, for the entire facility and the proposed project, and an updated Table L, the staffing table.

Response:

The revised physician roster resulted in a request for an update set of projections in Tables 3 and 4. These are provided in Attachments 12 and 13. A comparison of the net income projected in the original submission with the revised net income shows that the change in in physician complement is anticipated to have a positive impact on the operations of Harborside. This is a result of the small volume increase which will not result in any corresponding increase in fixed expenses or staffing.

With respect to the request for an updated staffing table (Table L) that would reflect staffing changes required to accommodate any changes attributable to the net change in volumes associated with the departure of Dr. Wolff and the addition of four physicians, the impact is small. Harborside reviewed its staffing that would be required for the projected utilization and determined that the proposed staffing presented in Table L does not need to be updated.

Question 10. An update of the projected payer list with which Harborside will participate.

Response:

No change to the projected payer list is contemplated, including taking the physician update into account.

Question 11. Since Harborside does not participate in Medicaid, if a patient qualifies for Medicaid, will they be provided with charity care? Or will they need to seek a provider that does participate with Medicaid? Please provide more details regarding these potential patients.

Response:

Consistent with the charity care policy submitted with the CON application and with the August 1, 2024, completeness response, if an individual seeking to become a patient of Harborside is a Medicaid beneficiary and the procedure is covered by Medicaid, they would not be eligible for charity care. The charity policy applies to “uninsured, underinsured, and indigent persons, who meet eligibility criteria.” It requires: “Proof that medical assistance has been applied for and rejected.”

The charity care policy also states: “If the rejection is for non-compliance with all medical assistance paperwork requirements, reduced fee or charity will not be granted. If medical assistance rejection is based on income, disability, or assets, Harborside will review person’s medical financial assistance application and make a final determination of eligibility. Harborside staff will assist all persons to complete the application or identify alternative programs such as Medicaid.”

This is the Harborside charity care policy because the individual with Medicaid benefits would have access to care by a provider that does participate in Medicaid and Harborside intends that its budgeted charity care be available to qualified individuals who would otherwise lack access to care. Otherwise, individuals who financially qualify for charity

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care and would lack access to care would be disadvantaged because Medicaid beneficiaries with coverage and access to care would have absorbed budgeted charity care funds.

Please see the attached signed attestations by the individuals assisting in preparing this response (Attachment 14).

Sincerely,

A handwritten signature in black ink, appearing to read "Howard L. Sollins". The signature is written in a cursive style with a horizontal line extending to the left.

Howard L. Sollins

HLS/lam

Enclosures

cc: Wynee Hawk, MHCC
Ewurama Shaw-Taylor, Ph.D., MHCC
Bill Chan, MHCC
Deanna Dunn, MHCC
Matthew Levy, MD, MPH,
Health Officer Prince George's County Health Department
Ms. Jane Falk
Mr. Daniel Sullivan
Mr. John Hill
John J. Eller, Esquire

LIST OF ATTACHMENTS

1. List of Owners and Their Percentages
2. Revised Table 6
3. Revised Table 7
4. Revised Table 10
5. Revised Table 11
6. Revised Table 12
7. Revised Table 13
8. Revised Table 14
9. Revised Table 15
10. Revised Table 1
11. Revised Table 2
12. Revised Table 3
13. Revised Table 4
14. Affirmations

ATTACHMENT 1

Revised List of Owners and % of Ownership

Owner	Ownership Share (%)
M2 Orthopedic Partners Holdings, LLC	60.27
Sameer Nagda, M.D.	5.13
Kevin Fricka, M.D.	4.73
Ben Kittredge, M.D.	4.73
George Branche III, M.D.	4.35
William G. Hamilton, M.D.	4.35
Michael Nathan, M.D.	3.16
Robert Sershon, M.D.	2.80
David Weintritt, M.D.	1.99
Steven Saddler, M.D.	1.97
Cassie Root, M.D.	1.58
Corey Wallach, M.D.	1.58
Rikesh Gandhi, M.D.	1.32
Nigel Azer, M.D.	1.02
G. Anderson Engh, M.D.	0.51
Craig McAsey, M.D.	0.51

ATTACHMENT 2

Table 6 (revised)
Harborside Surgery Center
Operating Room Capacity and Needs Assessment (COMAR 10.24.11.06)
Entire Facility

	Actual		Projected				
	CY2022	CY2023	CY2024	CY2025	CY2026	CY2027	CY2028
Total Cases	1,151	1,846	2,145	2,410	2,710	2,993	3,067
Total Surgical Minutes in OR	99,327	159,164	186,130	209,629	237,575	264,144	271,521
OR Turnaround Minutes, 25 minutes per case	28,775	46,150	53,625	60,250	67,750	74,825	76,675
Total OR Minutes, including Turnaround	128,102	205,314	239,755	269,879	305,325	338,969	348,196
Total Hours (minutes/60)	2,135.03	3,421.90	3,995.92	4,497.98	5,088.75	5,649.48	5,803.27
Optimal Capacity, Hours	1,632.00	3,264.00	3,264.00	4,896.00	4,896.00	4,896.00	4,896.00
Utilization, Percent	130.8%	104.8%	122.4%	91.9%	103.9%	115.4%	118.5%
OR Need (Total Hours/1632)	1.3	2.1	2.4	2.8	3.1	3.5	3.6

Note: Optimal Capacity is 1,632 hours per year.

ATTACHMENT 3

Table 7 (revised)				
Harborside Surgery Center				
Operating Room Capacity and Needs Assessment (COMAR 10.24.11.06)				
Project Only				
	Projected			
	CY2025	CY2026	CY2027	CY2028
Total Cases	803	903	998	1,022
Total Minutes (includes turnaround time @ 25 minutes)	89,960	101,775	112,990	116,065
Total Hours (minutes/60)	1,499.33	1,696.25	1,883.17	1,934.42
OR Need (Based on Optimal Capacity)	0.92	1.04	1.15	1.19
Utilization, Percent	91.9%	103.9%	115.4%	118.5%
<i>Note: Optimal Capacity is 1,632 hours per year.</i>				

ATTACHMENT 4

Table 10 (revised) [Taken from Table 14]

Harborside Surgery Center

Projected Cases

Summary of Responses

	Current Volumes at Harborside		Projected Volumes at Harborside		
	2022	2023	2025	2026	2027
Cases performed at Harborside	2,129	3,037			
Based on Current Volume			3,496	3,539	3,578
Shift from Other Facilities					
and Future Growth			681	1,026	1,361
Total	2,129	3,037	4,181	4,565	4,939
Increase from 2023			1,144	1,528	1,902

Dr. Wolff's Volumes, Deleted

	2022	2023	2025	2026	2027
Dr. Wolff's Volumes (cases)					
Cases performed at Harborside	120	36			
Based on Current Volume			15	15	15
Shift from Other Facilities			0	0	0
Physician Total	120	36	15	15	15
Table 14, CON					
Cases performed at Harborside	2,129	3,037			
Based on Current Volume			3,324	3,367	3,406
Shift from Other Facilities			561	906	1,241
and Future Growth					
Grand Total, Table 10, CON	2,129	3,037	3,885	4,273	4,647
Dr. Wolff Volumes (%)					
Cases performed at Harborside	5.64%	1.19%			
Based on Current Volume			0.45%	0.45%	0.44%
Shift from Other Facilities			0.00%	0.00%	0.00%
Grand Total	5.64%	1.19%	0.39%	0.35%	0.32%

ATTACHMENT 5

Table 11 (revised)
Harborside Surgery Center
Projected Surgery Cases, by Physician

Physician	Operating Room (Surgery) Cases					
	Historical	Projected				
	2023	2024	2025	2026	2027	2028
Azer, Nigel	76	79	120	160	200	200
Branche, George	95	68	75	80	84	89
Engh, Charles	40	68	72	96	120	120
Fricka, Kevin	363	460	484	521	558	558
Gallagher, Brian	31	41	44	46	48	50
Gandhi, Rikesh	17	14	14	15	15	16
Gebrelul, Aaron	21	44	85	102	136	170
Ghazal, Talal	0	0	6	6	6	6
Hamilton, William	266	372	386	414	414	414
Huffman, John	0	0	6	6	6	6
Kittredge, Ben	6	19	19	19	19	19
McAsey, Craig	70	105	134	179	201	224
Nagda, Sameer	136	116	110	120	140	151
Nathan, Michael	27	159	159	159	159	159
Narvaez, Michael	182	64	83	95	118	118
Pickett, Adam	0	0	23	23	23	23
Root, Cassie	43	22	22	22	22	22
Saddler, Stephen	101	86	85	91	91	91
Sershon, Robert	259	349	404	477	551	551
Sheth, Mihir	0	0	14	14	14	14
Wallach, Corey	18	9	10	11	12	12
Weintritt, David	59	54	54	54	54	54
Wolff, Andrew	36	15	0	0	0	0
Total	1,845	2,145	2,410	2,710	2,993	3,067

Reconciliation	2023	2024	2025	2026	2027	2028
Total, Table 11, CON Application	1,845	2,145	2,376	2,676	2,959	3,032
Less, Wolff (2025-2028)			(15)	(15)	(15)	(15)
Add, Ghazal	0	0	6	6	6	6
Add, Huffman	0	0	6	6	6	6
Add, Pickett	0	0	23	23	23	23
Add, Sheth	0	0	14	14	14	14
Total, Table 11 Revised	1,845	2,145	2,410	2,710	2,993	3,067

Increase (Decrease), Cases	0	0	34	34	34	34
Increase (Decrease), Percent	0.0%	0.0%	1.4%	1.3%	1.1%	1.1%

ATTACHMENT 6

Table 12 (revised)
Harborside Surgery Center
Projected Surgery Procedures, by Physician

Operating Room (Procedure) Cases						
Physician	Historical	Projected				
	2023	2024	2025	2026	2027	2028
Azer, Nigel	203	220	334	445	556	556
Branche, George	362	269	295	314	332	350
Engh, Charles	105	179	189	252	315	315
Fricka, Kevin	957	1,213	1,275	1,373	1,471	1,471
Gallagher, Brian	149	184	201	210	220	230
Gandhi, Rikesh	30	25	26	27	28	29
Gebrelul, Aaron	52	109	210	253	337	421
Ghazal, Talal	0	0	15	15	15	15
Hamilton, William	733	1,025	1,065	1,141	1,141	1,141
Huffman, John	0	0	15	15	15	15
Kittredge, Ben	13	41	41	41	41	41
McAsey, Craig	200	305	390	520	584	649
Nagda, Sameer	454	385	367	400	466	500
Nathan, Michael	104	500	500	500	500	500
Narvaez, Michael	572	262	339	387	484	484
Pickett, Adam	0	0	90	90	90	90
Root, Cassie	91	43	43	43	43	43
Saddler, Stephen	294	269	264	282	282	282
Sershon, Robert	730	985	1,139	1,346	1,553	1,553
Sheth, Mihir	0	0	48	48	48	48
Wallach, Corey	40	23	24	28	30	30
Weintritt, David	118	122	122	122	122	122
Wolff, Andrew	150	63	0	0	0	0
Total	5,355	6,220	6,990	7,850	8,672	8,884

Reconciliation	2023	2024	2025	2026	2027	2028
Total, Table 12, CON Application	5,355	6,219	6,885	7,745	8,566	8,778
Less, Wolff (2025-2028)			(63)	(63)	(63)	(63)
Add, Ghazal	0	0	15	15	15	15
Add, Huffman	0	0	15	15	15	15
Add, Pickett	0	0	90	90	90	90
Add, Sheth	0	0	48	48	48	48
Total, Table 12 Revised	5,355	6,219	6,990	7,850	8,672	8,884

Increase (Decrease), Cases	0	0	106	106	106	106
Increase (Decrease), Percent	0.0%	0.0%	1.5%	1.4%	1.2%	1.2%

ATTACHMENT 7

Table 13 (revised)
Cases Performed at Other ASC and HOPD Locations by Members of Harborside's Medical Staff
2023

Physician	Hospital Outpatient Departments					Other ASC Locations			Total Anderson Cases Able to be Shifted from Other Sites
	Inova Alexandria Hospital	Inova Fair Oaks Hospital	Inova Mount Vernon Hospital	Reston Hospital	Virginia Hospital Center	Capital Orthopaedic Surgical Center	Fairfax Surgical Center	Fairfax Surgical Center	
Azer, Nigel	324	-	-	-	-	-	-	-	324
Branche, George	-	-	-	-	-	-	28	-	28
Engh, Charles	-	-	168	-	-	-	-	-	168
Fricka, Kevin	-	-	264	-	-	-	-	-	264
Gallagher, Brian	-	4	16	4	-	-	-	-	24
Gandhi, Rikesh	-	-	-	-	4	-	-	100	104
Gebrelul, Aaron	-	8	224	-	-	-	-	-	232
Ghazal, Talai	-	-	-	-	40	-	-	-	40
Hamilton, William	-	-	208	-	-	-	-	-	208
Huffman, John	-	-	-	-	40	-	-	-	40
McAsey, Craig	-	-	384	-	-	-	-	-	384
Nagda, Sameer	-	-	208	-	-	-	-	-	208
Narvaez, Michael	164	-	-	-	-	-	-	108	272
Saddler, Stephen	-	-	92	-	-	-	-	-	92
Schipper, Oliver	-	-	28	-	-	272	-	-	300
Sershon, Robert	-	-	140	-	-	156	-	-	296
Wallach, Corey	136	-	-	-	-	-	-	-	136
Total	624	12	1,732	4	84	428	28	208	3,120

Source: Harborside Records

ATTACHMENT 8

Table 14 (revised)

Harborside Surgery Center

Projected Cases to be Shifted from Other Surgical Facilities

Physician Name	Current Volumes at Harborside		Projected Volumes at Harborside			Shift From
	2022	2023	2025	2026	2027	
Azer, Nigel						
Cases performed at Harborside	24	78				
Based on Current Volume			78	80	80	
Shift from Other Facilities			52	96	140	Alexandria HOPD
Physician Total	24	78	132	176	220	
Branche, George						
Cases performed at Harborside	232	255				
Based on Current Volume			269	286	302	
Shift from Other Facilities			0	0	0	NA
Physician Total	232	255	269	286	302	
Engh, Charles A.						
Cases performed at Harborside	11	40				
Based on Current Volume			68	68	69	
Shift from Other Facilities			4	28	52	Mt Vernon HOPD
Physician Total	11	40	72	96	120	
Fricka, Kevin						
Cases performed at Harborside	159	363				
Based on Current Volume			459	460	460	
Shift from Other Facilities			24	61	98	Mt Vernon HOPD
Physician Total	159	363	484	521	558	
Gallagher, Brian						
Cases performed at Harborside	10	113				
Based on Current Volume			182	192	201	
Shift from Other Facilities			24	24	24	Mt Vernon HOPD
Physician Total	10	113	206	216	225	
Gandhi, Rikesh						
Cases performed at Harborside	245	217				
Based on Current Volume			198	211	224	
Shift from Other Facilities			104	104	104	Franconia
Physician Total	245	217	302	315	328	
Gebreleul, Aaron						
Cases performed at Harborside	0	21				
Based on Current Volume			44	44	44	
Shift from Other Facilities			41	58	92	Mt Vernon HOPD
Physician Total	0	21	85	102	136	
Ghazal, Talal						
Cases performed at Harborside	0	0				
Based on Current Volume			0	0	0	
Shift from Other Facilities			60	60	60	Virginia Hospital
Physician Total	0	0	60	60	60	
Hamilton, William						
Cases performed at Harborside	102	266				
Based on Current Volume			336	336	336	
Shift from Other Facilities			50	78	78	Mt Vernon HOPD
Physician Total	102	266	386	414	414	
Huffman, John						
Cases performed at Harborside	0	0				
Based on Current Volume			0	0	0	
Shift from Other Facilities			60	60	60	Virginia Hospital
Physician Total	0	0	60	60	60	
Kittredge, Ben						
Cases performed at Harborside	156	77				
Based on Current Volume			84	84	84	
Shift from Other Facilities			0	0	0	NA
Physician Total	156	77	84	84	84	

Table 14 (revised), Continued

Harborside Surgery Center

Projected Cases to be Shifted from Other Surgical Facilities

Physician Name	Current Volumes at Harborside		Projected Volumes at Harborside			Shift From
	2022	2023	2025	2026	2027	
McAsey, Craig						
Cases performed at Harborside	7	72				
Based on Current Volume			72	72	72	
Shift from Other Facilities			70	117	140	Mt Vernon HOPD
Physician Total	7	72	142	189	212	
Nagda, Sameer						
Cases performed at Harborside	222	265				
Based on Current Volume			284	284	284	
Shift from Other Facilities			0	11	60	Mt Vernon HOPD
Physician Total	222	265	284	295	344	
Narvaez, Michael						
Cases performed at Harborside	13	48				
Based on Current Volume			120	120	120	
Shift from Other Facilities			35	58	102	Alexandria , Franconia
Physician Total	13	48	155	178	222	
Nathan, Michael						
Cases performed at Harborside	110	182				
Based on Current Volume			159	159	159	
Shift from Other Facilities			0	0	0	
Physician Total	110	182	159	159	159	
Pickett, Adam						
Cases performed at Harborside	0	0				
Based on Current Volume			115	115	115	
Shift from Other Facilities			0	0	0	
Physician Total	0	0	115	115	115	
Root, Cassie						
Cases performed at Harborside	276	332				
Based on Current Volume			192	192	192	
Shift from Other Facilities			0	0	0	NA
Physician Total	276	332	192	192	192	
Saddler, Stephen						
Cases performed at Harborside	129	155				
Based on Current Volume			156	156	156	
Shift from Other Facilities			30	42	42	Franconia
Physician Total	129	155	186	198	198	
Sershon, Robert						
Cases performed at Harborside	76	261				
Based on Current Volume			344	344	344	
Shift from Other Facilities			65	140	214	Mt Vernon HOPD,Capital
Physician Total	76	261	409	484	558	
Sheth, Mihir						
Cases performed at Harborside	0	0				
Based on Current Volume			72	72	72	
Shift from Other Facilities			0	0	0	
Physician Total	0	0	72	72	72	
Wallach, Corey						
Cases performed at Harborside	107	122				
Based on Current Volume			96	96	96	
Shift from Other Facilities			62	89	95	Alexandria
Physician Total	107	122	158	185	191	

Table 14 (revised), Continued

Harborside Surgery Center

Projected Cases to be Shifted from Other Surgical Facilities

Physician Name	Current Volumes at Harborside		Projected Volumes at Harborside			Shift From
	2022	2023	2025	2026	2027	
Weinritt, David						
Cases performed at Harborside	130	134				
Based on Current Volume			168	168	168	
Shift from Other Facilities			0	0	0	
Physician Total	130	134	168	168	168	
Wolff, Andrew						
Cases performed at Harborside	120	36				
Based on Current Volume						
Shift from Other Facilities						
Physician Total	120	36				
Total Physicians						
Cases performed at Harborside	2,129	3,037				
Based on Current Volume			3,496	3,539	3,578	
Shift from Other Facilities			681	1,026	1,361	
Grand Total	2,129	3,037	4,181	4,563	4,940	
Increase from 2023			1,144	1,526	1,903	
Dr. Wolff's Volumes	2022	2023	2025	2026	2027	
Cases performed at Harborside	120	36				
Based on Current Volume			15	15	15	
Shift from Other Facilities			0	0	0	
Physician Total	120	36	15	15	15	
Grand Total, Table 14, CON	2,129	3,037	3,885	4,273	4,647	
Dr. Wolff's Volumes (%)	5.64%	1.19%	0.39%	0.35%	0.32%	

ATTACHMENT 9

Table 15 (revised)				
Harborside Physicians' Cases Remaining at Other ASC and HOPD Locations				
Based on 2023 Volumes				
	Cases Remaining at Other Sites of Service			
	2024	2025	2026	2027
Azer, Nigel	317	272	228	184
Branche, George	91	67	50	34
Engh, Charles	168	164	140	116
Fricka, Kevin	264	240	203	166
Gallagher, Brian	7	-	-	-
Gandhi, Rikesh	-	-	-	-
Gebrelul, Aaron	232	191	174	140
Ghazal, Mihir	50	60	60	60
Hamilton, William	172	158	130	130
Huffman, John	50	60	60	60
McAsey, Craig	345	314	267	244
Nagda, Sameer	208	221	197	148
Narvaez, Michael	272	237	214	170
Pickett, Adam	-	-	-	-
Saddler, Stephen	59	62	50	50
Schipper, Oliver	300	300	300	300
Sershon, Robert	286	231	156	83
Sheth, Mihir	-	-	-	-
Wallach, Corey	85	74	47	41
Grand Total	2,906	2,651	2,277	1,923

ATTACHMENT 10

TABLE 1: STATISTICAL PROJECTIONS - ENTIRE FACILITY

CY or FY (Circle)	Two Most Recent Years (Actual)		Current Year Projected	Projected Years (ending with first full year at full utilization)			
	2022	2023	2024	2025	2026	2027	2028
a. Number of operating rooms (ORs)	1	2	2	3	3	3	3
• Total Procedures in ORs	4,679	5,360	6,219	6,991	7,851	8,673	8,884
• Total Cases in ORs	1,151	1,846	2,145	2,410	2,710	2,993	3,067
• Total Surgical Minutes in ORs**	99,327	159,164	186,130	209,629	237,575	264,144	271,521
b. Number of Procedure Rooms (PRs)	1	3	3	2	2	2	2
• Total Procedures in PRs	2,824	3,167	4,007	4,972	5,250	5,576	5,730
• Total Cases in PRs	1,081	1,200	1,434	1,758	1,853	1,947	1,995
• Total Minutes in PRs**	62,026	73,459	91,636	108,350	113,697	120,450	123,781

**Do not include turnover time.

ATTACHMENT 11

TABLE 2: STATISTICAL PROJECTIONS - PROPOSED PROJECT

(INSTRUCTION: All applicants should complete this table.)

CY or FY (Circle)	Projected Years (Ending with first full year at full utilization)			
	2025	2026	2027	2028
a. Number of operating rooms (ORs)	1	1	1	1
• Total Procedures in ORs	772	1,631	2,453	2,665
• Total Cases in ORs	265	566	848	922
• Total Surgical Minutes in ORs**	23,499	51,445	78,014	85,391
b. Number of Procedure Rooms (PRs)	0	0	0	0
• Total Procedures in PRs	0	0	0	0
• Total Cases in PRs	0	0	0	0
• Total Minutes in PRs**	0	0	0	0

*Do not include turnover time

ATTACHMENT 12

TABLE 3: REVENUES AND EXPENSES - ENTIRE FACILITY (including proposed project)

(INSTRUCTION: ALL EXISTING FACILITY APPLICANTS MUST SUBMIT AUDITED FINANCIAL STATEMENTS)

CY or FY (Circle)	Two Most Recent Years Actual		Current Year Projected	Projected Years (ending with first full year at full utilization)			
	2022	2023	2024	2025	2026	2027	2028
1. Revenue							
a. Inpatient services	0	0	0	0	0	0	0
b. Outpatient services	82,867,820	135,756,360	173,714,825	201,660,081	226,654,893	250,202,290	257,122,309
c. Gross Patient Service Revenue	82,867,820	135,756,360	173,714,825	201,660,081	226,654,893	250,202,290	257,122,309
d. Allowance for Bad Debt	(15,099)	(263,323)	(296,772)	(390,062)	(437,825)	(482,683)	(495,391)
e. Contractual Allowance	69,558,999	114,017,154	145,728,275	169,181,795	190,207,367	210,028,631	215,891,527
f. Charity Care	0	0	(248,030)	(275,876)	(302,006)	(324,732)	(332,716)
g. Net Patient Services Revenue	13,293,722	21,475,883	27,441,748	31,812,348	35,707,695	39,366,243	40,402,674
h. Other Operating Revenues (Specify)	116,512	159,401	203,391	236,122	265,035	292,190	299,882
i. Net Operating Revenue	13,410,235	21,635,284	27,645,139	32,048,470	35,972,730	39,658,433	40,702,557

Table 3 Cont.	Two Most Recent Years Actual		Current Year Projected	Projected Years (ending with first full year at full utilization)			
	2022	2023	2024	2025	2026	2027	2028
2. Expenses							
a. Salaries, Wages, and Professional Fees,	2,705,517	3,942,055	4,595,195	5,216,653	5,734,085	6,023,197	6,198,313

(including fringe benefits)							
b. Contractual Services	588,960	836,770	1,083,722	1,203,747	1,322,792	1,434,192	1,468,326
c. Interest on Current Debt	71,765	973,779	987,297	884,644	776,320	667,996	559,673
d. Interest on Project Debt	0	0	0	0	0	0	0
e. Current Depreciation	151,344	1,034,315	735,004	735,004	735,004	735,004	735,004
f. Project Depreciation	0	0	0	14,799	14,799	14,779	14,779
g. Current Amortization	4,302,711	4,302,711	4,316,151	4,316,151	4,316,151	4,316,151	4,316,151
h. Project Amortization	0	0	0	0	0	0	0
i. Supplies	4,564,749	8,559,580	11,505,788	13,375,611	15,377,727	17,278,023	17,932,304
j. Other Expenses (Specify)	866,297	1,210,866	1,579,795	1,841,038	1,923,743	2,003,818	2,046,991
k. Total Operating Expenses	13,251,974	20,860,076	24,802,953	27,587,647	30,200,621	32,473,181	33,271,560
3. Income							
a. Income from Operation	158,260	775,208	2,842,186	4,460,823	5,772,109	7,185,252	7,430,996
b. Non-Operating Income	(902,768)	(675,969)	0	0	0	0	0
c. Subtotal	(744,507)	99,239	2,842,186	4,460,823	5,772,109	7,185,252	7,430,996
d. Income Taxes	0	0	0	0	0	0	0
e. Net Income (Loss)	(744,507)	99,239	2,842,186	4,460,823	5,772,109	7,185,252	7,430,996
4. Patient Mix:							
A. Percent of Total Revenue							
1. Medicare	12%	20%	25%	26%	26%	26%	26%

2. Medi0aid	0%	0%	0%	0%	0%	0%	0%
3. Blue Cross	38%	36%	31%	31%	31%	31%	31%
4. Commercial Insurance	40%	36%	37%	37%	36%	36%	36%
5. Self-Pay	0%	1%	0%	0%	0%	0%	0%
6. Other (WC, VA)	10%	7%	6%	6%	6%	6%	6%
7. TOTAL	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

Note: Totals may not match due to rounding.

Table 3 Cont.	Two Most Recent Years Actual		Current Year Projected	Projected Years (ending with first full year at full utilization)			
	2022	2023	2024	2025	2026	2027	2028
B. Percent of Patient Days/Visits/Procedures (as applicable)							
1. Medicare	18%	24%	31%	31%	32%	32%	32%
2. Medicaid	0%	0%	0%	0%	0%	0%	0%
3. Blue Cross	40%	37%	32%	31%	31%	31%	31%
4. Commercial Insurance	33%	30%	30%	29%	29%	29%	29%
5. Self-Pay	0%	1%	0%	1%	1%	1%	1%
6. Other (WC, VA)	8%	8%	7%	7%	7%	7%	7%
7. TOTAL	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

Note: Totals may not match due to rounding

ATTACHMENT 13

TABLE 4: REVENUES AND EXPENSES - PROPOSED PROJECT

(INSTRUCTION: Each applicant should complete this table for the proposed project only)

	Projected Years (Ending with first full year at full utilization)			
CY or FY (Circle)	2025	2026	2027	2028
1. Revenues				
a. Inpatient Services	0	0	0	0
b. Outpatient Services	17,060,108	39,191,894	59,387,382	64,494,392
c. Gross Patient Services Revenue	17,060,108	39,191,894	59,387,382	64,494,392
d. Allowance for Bad Debt	(32,942)	(75,608)	(114,434)	(124,112)
e. Contractual Allowance	(14,311,382)	(32,898,960)	(49,870,471)	(54,171,280)
f. Charity Care	(29,104)	(50,984)	(69,547)	(76,803)
g. Net Patient Care Service Revenues	2,686,681	6,166,342	9,332,930	10,122,198
h. Other Operating Revenue	19,941	45,769	69,272	75,130
h. Total Net Operating Revenue	2,706,622	6,212,111	9,402,202	10,197,328
2. Expenses				
a. Salaries, Wages, and Professional Fees, (including fringe benefits)	621,458	1,138,890	1,428,002	1,603,118
b. Contractual Services	120,025	239,070	350,470	384,604
c. Interest on Current Debt	0	0	0	0
d. Interest on Project Debt	0	0	0	0
e. Current Depreciation	0	0	0	0
f. Project Depreciation	14,799	14,799	14,799	14,799
g. Current Amortization	0	0	0	0
h. Project Amortization	0	0	0	0
i. Supplies	1,892,836	3,361,718	4,737,402	5,210,563
j. Other Expenses (Specify)	261,243	343,948	424,023	467,195
k. Total Operating Expenses	2,910,360	5,098,425	6,954,695	7,680,278

Table 4 Cont.	Projected Years (Ending with first full year at full utilization)			
CY or FY (Circle)	2025	2026	2027	2028
3. Income				
a. Income from Operation	(203,738)	1,113,686	2,447,506	2,517,050

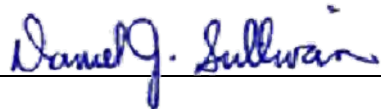
b. Non-Operating Income	0	0	0	0
c. Subtotal	(203,738)	1,113,686	2,447,506	2,517,050
d. Income Taxes	0	0	0	0
e. Net Income (Loss)	(203,738)	1,113,686	2,447,506	2,517,050
4. Patient Mix:				
A. Percent of Total Revenue				
1. Medicare	28%	28%	28%	28%
2. Medicaid	0%	0%	0%	0%
3. Blue Cross	32%	32%	32%	32%
4. Commercial Insurance	36%	35%	35%	35%
5. Self-Pay	0%	0%	0%	0%
6. Other (Workers Comp, VA)	4%	4%	4%	4%
7. TOTAL	100.00%	100.00%	100.00%	100.00%
B. Percent of Patient Days/Visits/Procedures (as applicable)				
1. Medicare	34%	35%	35%	35%
2. Medicaid	0%	0%	0%	0%
3. Blue Cross	30%	30%	30%	30%
4. Commercial Insurance	28%	28%	27%	27%
5. Self-Pay	1%	1%	1%	1%
6. Other (Workers Comp, VA)	6%	6%	6%	6%
7. TOTAL	100.00%	100.00%	100.00%	100.00%

Note: Totals may not match due to rounding

ATTACHMENT 14

AFFIRMATION

I hereby declare and affirm under the penalties of perjury that the facts stated in this application and attachments are true and correct to the best of my knowledge, information and belief.

By: 

Printed Name: Daniel J. Sullivan

Title: President

Date: 11/11/24

AFFIRMATION

I hereby declare and affirm under the penalties of perjury that the facts stated in this application and attachments are true and correct to the best of my knowledge, information and belief.

By: John F. Hill
Printed Name: JOHN F. HILL
Title: Consultant
Date: November 11, 2024