



STATE OF WASHINGTON
DEPARTMENT OF HEALTH

Certificate of Need Program
111 Israel Road Southeast – MS 4-7852
Olympia, Washington 98504

March 8, 2016

Debra Ravasia, MD
Women's Health Connection
9425 North Nevada, #300
Spokane, Washington 99218

Dear Dr. Ravasia:

RE: DOR 16-22

The Department of Health has completed its review of your exemption request regarding the establishment of an ambulatory surgery center in Spokane, within Spokane County. Below is the information considered and the facts relied upon by the Department of Health's Certificate of Need Program in reaching its conclusion regarding your project.

INFORMATION CONSIDERED

- Ambulatory Surgery Center (ASC) exemption application received February 12, 2016
- Supplemental information obtained March 7, 2016
- Revised Code of Washington (RCW) 70.38
- Washington Administrative Code (WAC) 246-310
- Washington Secretary of State and Department of Revenue information obtained from the respective websites
- Department of Health external provider look-up
- Department of Health Integrated Licensing and Regulatory System (ILRS)
- Certificate of Need historical files

FACTS CONSIDERED

- On October 28, 2005, Northwest Health Summit, PS established the professional corporation with the Washington Secretary of State's office.
- Northwest Health Summit, PS is solely governed by Debra Ravasia, MD. [source: Secretary of State website]
- Northwest Health Summit, PS has been registered with the Washington State Department of Revenue since January 1, 2006. [source: Department of Revenue website]
- Northwest Health Summit, PS operates with three separate 'doing business as' or 'dba.' They are: Metabolic Health Connection; Northwest Psychiatry & TMS Services, and Women's Health Connection.

- This exemption request focuses on the dba of 'Women's Health Connection.'
- Women's Health Connection has two practice sites and both are located in Spokane County. Information on both sites is below.

Address	City/Zip
<i>9425 North Nevada, #300</i>	<i>Spokane/99218</i>
16201 East Indiana Avenue, #5300	Spokane Valley/99216

- This exemption request focuses on the site on North Nevada that is shown in italics above. The North Nevada site currently includes the practice and an exempt ambulatory surgery center.¹ The East Indiana site does not include an ambulatory surgery center.
- Women's Health Connection intends to relocate North Nevada practice to a new site at 5915 South Regal in Spokane [99218].² This application proposes the establishment of an ambulatory surgery center (ASC) at the new practice site.
- The ASC will be operated under the practice corporation of Northwest Health Summit, PS and the dba of Women's Health Connection.
- At this time, only the sole owning physician intends to use the ASC. Future owners or employees may have access to the ASC.³ A table with specific physician credentialing information and practice association is below.

Name	Credential Status	Practice Status	Percent of Time
Debra J. Ravasia	Active	Owner	100%

- The procedures proposed include those typically associated with women's health care. Examples include hysteroscopy, cystoscopy, and tubal ligations. A listing of common procedures is included in the exemption application.
- The ASC will not be operated as a separate legal entity from the Northwest Health Summit, PS practice.
- No management agreement is proposed.

¹ DOR #07-27 issued on June 19, 2007.

² Construction Review Services technical assistance #60571987.

³ Employed physicians must be employed by Northwest Health Summit, PS dba Women's Health Connection a minimum of 75% and perform their full range of services through Northwest Health Summit, PS dba Women's Health Connection.

CONCLUSION

Based on the totality of information considered, the department concludes the proposed ASC would be exempt from Certificate of Need review. This exemption is not transferable and the conclusions reached concerning this proposed ASC are based on the facts about this facility and it should not be assumed the department would reach the same conclusion in future exemption requests for other future ASCs.

If changes are made in the operation or ownership of this proposed ASC, the ASC may no longer be eligible for this exemption. In that case, prior Certificate of Need review and approval or new exemption would be required. Examples of such changes include the following. This list is not intended to be all inclusive.

- The scope of services is expanded to include services subject to Certificate of Need review under the provisions of WAC 246-310-020.
- The provision of any procedure as identified under WAC 246-310-705(4).
- The ASC is operated under a management agreement.
- The ASC is organized as a separate legal entity from the practice.
- The ASC is moved to a different site than identified in the exemption application.
- Use of the ASC is extended to any physician who is not a member/owner or employed by Northwest Health Summit, PS dba Women's Health Connection.
- Use of the ASC is extended to any physician that is an independent contractor.
- The ASC obtains a new or separate Medicare certification from the clinical practice.
- The ASC ceases operations or relinquishes its Medicare certification and then chooses to resume services as an ASC.
- The ASC or the practice is purchased or leased.
- ASC patients are routinely transferred from the ASC for observation care at one of the area's hospitals.

APPEAL OPTION

This decision may be appealed. You or any person with standing may request an adjudicative proceeding to contest this decision within 28 calendar days from the date of this letter. The notice of appeal must be filed according to the provisions of Revised Code of Washington 34.05 and Washington Administrative Code 246-310-610. A request for an adjudicative proceeding must be received within the 28 days at one of the addresses listed below.

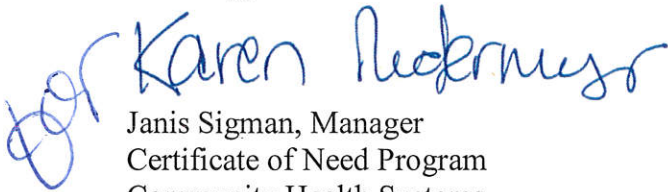
Mailing Address:
Department of Health
Adjudicative Service Unit
Mail Stop 47879
Olympia, WA 98504-7879

Physical Address
Department of Health
Adjudicative Service Unit
111 Israel Road SE
Tumwater, WA 98501

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If you have any questions or would like to arrange for a meeting to discuss this decision, please call me at (360) 236-2955.

Sincerely,

Handwritten signature in blue ink, appearing to read "Janis Sigman".

Janis Sigman, Manager
Certificate of Need Program
Community Health Systems

cc: Department of Health, Construction Review Services #60613371