



STATE OF WASHINGTON
DEPARTMENT OF HEALTH

January 28, 2014

Randal Brand, Director of Facilities
and Support Services
The Polyclinic PC
1145 Broadway
Seattle, Washington 98122

DOR #14-10

Dear Mr. Brand:

On September 27, 2013, The Polyclinic, PC in Seattle submitted an Ambulatory Surgical Center (ASC) Exemption Application for the establishment of a surgery center in Seattle. After reviewing the exemption application, the department determined the application was incomplete. On October 22, 2013, the department sent a letter to you requesting supplemental information or clarification. During a November 21, 2013, telephone conversation with Certificate of Need Program staff, you stated you would provide the requested information on approximately December 6, 2013. On December 9, 2013, Certificate of Need Program staff sent a letter to you reminding you that a response to the October 22 letter is necessary.

To date, no additional information has been provided. As a result, the department will review the exemption application without supplemental information or clarification.

INFORMATION CONSIDERED

- ASC Exemption Application submitted on September 27, 2013
- Revised Code of Washington (RCW) 70.38
- Washington Administrative Code (WAC) 246-310
- Washington State Secretary of State information obtained from its website
- Washington State Department of Revenue information obtained from its website
- The department's October 22, 2013, letter requesting supplemental information or clarification

FACTS CONSIDERED

- The exemption application stated that The Polyclinic, PC is a group practice; however, a group practice agreement was not provided as required in the application.
- Documentation obtained from the Washington State Secretary of State office shows a listing of six members that govern the corporation. The six members are listed in the table on the following page.



Name	Title
Rex Ochi	President, Chairman
Katherine Brown	Vice President, Director
Peter Baciewicz	Secretary/Treasurer, Director
David Lloyd	Director
Emily Bradley	Director
Kelly White	Director

- Two additional corporations were identified on the Secretary of State website; however the relationship of the three corporations is unclear. The two corporations are: The Polyclinic Community Health Foundations; and Polyclinic Management Services Company, LLC.
- The exemption application did not identify which corporation that would hold the Washington State ASC license and the Medicare certification.
- The exemption application identified 14 practice sites for The Polyclinic, PC; it is unclear whether all are currently operating. The 14 practice sites are listed below.

Address	City	Zip
904 – 7 th Avenue	Seattle	98104
11011 Meridian Avenue North, #200	Seattle	98133
1145 Broadway	Seattle	98122
840 North 5 th Avenue, #107 & 2400	Sequim	98382
1801 Northwest Market Street, #203 & 308	Seattle	98107
2902 Beacon Avenue South	Seattle	98144
3216 Northeast 45 th Place, #200	Seattle	98105
509 Olive Way, #900	Seattle	98101
11545 – 15 th Street Northeast, #205	Seattle	98125
7315 – 212 th Street Southwest, #205	Edmonds	98026
10700 Meridian Avenue North, #105	Seattle	98133
1001 Broadway, #215	Seattle	98133
3400 California Avenue Southwest, #200	Seattle	98116
751 Northeast Blakely Drive, #3020	Issaquah	98029

- The exemption application identified 130 physicians with ownership of the group practice. Page 6 of the listing was not provided.
- The exemption application identified an additional 18 physicians that are associated with the group practice in an unidentified capacity. Again, page 6 of this listing was not provided.
- Of the total of 148 physicians listed in the exemption application, three employed physicians would have access to the proposed ASC. One physician’s credential could not be confirmed.
- Plastic surgery procedures were to be performed at the ASC. A description of the types of plastic procedures was not provided as required in the exemption application.

CONCLUSION

Without completion information in the exemption application, the department must conclude that the proposed ASC does not qualify for an exemption. Accordingly, the ASC is subject to prior Certificate of Need review and approval before it is established. This conclusion is consistent with prior Certificate of Need decisions. Enclosed is a copy of the Certificate of Need rules, (WAC 246-310), regulations (RCW 70.38), and a blank application form should you wish to pursue this project.

APPEAL OPTION

This decision may be appealed. Your appeal option is identified below.

Appeal Option:

You 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 following addresses:

Mailing Address:

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

Other Than By Mail

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

Please call me at (360) 236-2957 if you have any questions or you would like to meet to discuss this determination.

Sincerely,



Karen Nidermayer, Analyst
Certificate of Need Program
Community Health Systems

Enclosure