December 31, 2012

Matt Crocket, Assistant Administrator
Highline Medical Center Specialty Campus
12844 Military Road South
Tukwila, Washington 98168

Dear Mr. Crockett:

We have completed our review of the materials submitted on December 11 and December 20, 2012, about the relocation of level II rehabilitation services from Highline Medical Center's specialty campus to its main campus. Based on that review, the department concludes the relocation of these services is not subject to prior Certificate of Need review and approval.

This determination is not transferable and is based on the facts submitted. Prior Certificate of Need review and approval may be required if changes occur in the facts we relied on to make this determination.

Highline Medical Center is currently licensed for 239 acute care beds at two campuses. The main campus has 154 licensed beds and the specialty campus has 85 licensed beds. Your December 11 letter requests the relocation of level II rehabilitation services, but not the associated beds, from the specialty campus to the main campus. With the relocation of services, the table below shows the number of beds and services located at each campus.

<table>
<thead>
<tr>
<th>HIGHLINE MEDICAL CENTER MAIN CAMPUS</th>
<th>HIGHLINE MEDICAL CENTER SPECIALITY CAMPUS</th>
</tr>
</thead>
<tbody>
<tr>
<td>16251 Sylvester Road Southwest in Burien</td>
<td>12844 Military Road South in Tukwila</td>
</tr>
<tr>
<td>Medical/Surgical = 137</td>
<td>Geropsych, inpatient detox =62</td>
</tr>
<tr>
<td>Level II rehabilitation = 12</td>
<td>Available but not in use = 23</td>
</tr>
<tr>
<td>Level 2 nursery = 5</td>
<td></td>
</tr>
<tr>
<td>Total beds = <strong>154</strong></td>
<td>Total beds <strong>85</strong></td>
</tr>
</tbody>
</table>

Prior to April 2, 2012, Highline Medical Center also operated a 30-bed skilled nursing facility on the main campus in Burien. On April 2, 2012, Highline Medical Center banked the 30 skilled nursing beds under the full facility closure provisions of Revised Code of Washington 70.38.115(13). These 30 banked beds are not included in the 154 licensed beds located at the main campus.
Additionally, Regional Hospital for Respiratory and Complex Care is a 40-bed long term acute care hospital [LTACH] located on Highline Medical Center’s specialty campus. The 40 LTACH beds are not included in the 85 beds located on the specialty campus.

On December 28, 2012, the department provided Franciscan Health System with a determination of non-reviewability regarding a proposed affiliation between Franciscan Health System and Highline Medical Center’s main campus only. With this letter, the department is acknowledging a change in the types of services located at each of Highline Medical Center’s campuses from those services described in the December 28, 2012, letter.

This determination of non-reviewability does not constitute approval under any other local, federal, or state statute, or implementing rules and regulations. Examples where additional approval may be necessary include, but are not limited to, construction plan approval through the Construction Review Section of the Department of Health, facility licensing/certification through the Department of Social and Health Services or Department of Health, and other federal or local jurisdiction permits.

**APPEAL OPTION**

You or any interested or affected person may appeal this determination by requesting an adjudicative proceeding within 28 calendar days from the date of this letter. The notice of appeal must be filed according to the provisions of RCW 34.05 and WAC 246-310-610. A request for an adjudicative proceeding must be received within the 28 days at one of the following addresses:

**Mailing Address:**
Adjudicative Service Unit
Mail Stop 47879
Olympia, WA 98504-7879

**Other Than By Mail**
Adjudicative Clerk Office
310 Israel Road SE, Building 6
Tumwater, WA 98501

Please call me at (360) 236-2955 if you have any further questions as you proceed with the relocation of rehabilitation services.

Sincerely,

[Signature]

Janis R. Sigman, Manager
Certificate of Need Program
Office of Certification and Technical Support

cc: Department of Health, Investigations and Inspections Office
     Meta Dooley, Franciscan Health System