

COMMONWEALTH OF VIRGINIA

APPLICATION FOR A

MEDICAL CARE FACILITIES CERTIFICATE OF PUBLIC NEED

(CHAPTER 4, ARTICLE 1:1 OF TITLE 32.1,

SECTIONS 32.1 – 102.1 THROUGH 32.1 – 102.11 OF

THE CODE OF VIRGINIA OF 1950, AS AMENDED)

HOSPITALS

COPN Request No. VA-8882

Inova Health Care Services d/b/a Inova Loudoun Hospital

Expansion of MRI Services Through the Addition of One MRI Unit

March 27, 2026

SECTION I FACILITY ORGANIZATION AND IDENTIFICATION

A. Inova Loudoun Hospital

Official Name of Facility

44045 Riverside Parkway

Address

<u>Leesburg</u>	<u>VA</u>	<u>20176</u>
City	State	Zip

703-858-6000

Telephone

B. Inova Health Care Services

Legal Name of Applicant

8095 Innovation Park Drive

Address

<u>Fairfax</u>	<u>VA</u>	<u>22031</u>
City	State	Zip

C. Chief Administrative Officer

Susan Carroll, President, Inova Loudoun Hospital

Name

44045 Riverside Parkway

Address

<u>Leesburg</u>	<u>VA</u>	<u>20176</u>
City	State	Zip

703-858-6000

Telephone

D. Person(s) to whom questions regarding application should be directed:

Jessica Parker, Senior Director, Strategy & Planning, Inova Health System

Name

8095 Innovation Park Drive

Address

Fairfax	VA	22031
City	State	Zip
703-517-9320	None	Jessica.Parker@inova.org
Telephone	Facsimile	E-mail

E. Type of Control and Ownership (Complete appropriate section for both owner and operator.)

Will the facility be operated by the owner? Yes **X** No _____

Owner of the Facility (Check one)	Proprietary	Operator of Facility (Check one)
--------------------------------------	-------------	-------------------------------------

(1) _____	(1) Individual	(1) _____
-----------	----------------	-----------

(2) _____	(2) Partnership-attach copy of Partnership Agreement and receipt showing that agreement has been recorded	(2) _____
-----------	---	-----------

(3) _____	(3) Corporate-attach copy of Articles of Incorporation and Certificate of Incorporation	(3) _____
-----------	---	-----------

(4) _____	(4) Other _____ Identify	(4) _____
-----------	--------------------------	-----------

Non-Profit

(5) <u>X</u>	(5) Corporation-attach copy of Articles of Incorporation and Certificate of Incorporation	(5) <u>X</u>
---------------------	---	---------------------

Please see Attachments A.1 and A.2.

(6) _____	(6) Other _____ Identify	(6) _____
-----------	--------------------------	-----------

Governmental

(7) _____	(7) State	(7) _____
-----------	-----------	-----------

(8) _____	(8) County	(8) _____
-----------	------------	-----------

(9) _____	(9) City	(9) _____
-----------	----------	-----------

- (10) _____ (10) City/County (10) _____
- (11) _____ (11) Hospital Authority or Commission (11) _____
- (12) _____ (12) Other _____ Identify (12) _____

F. Ownership of the Site (Check one and attach copy of document)

- (1) X Fee simple title held by the applicant
- (2) _____ Option to purchase held by the applicant
- (3) _____ leasehold interest for not less than _____ years
- (4) _____ Renewable lease, renewable every _____ years
- (5) _____ Other _____ Identify

Please see Attachment B.

G. Attach a list of names and addresses of all owners or persons having a financial interest of five percent (5%) or more in the medical care facility.

Inova Loudoun Hospital (“ILH”) is owned by Inova Health Care Services, a 501(c)(3) Virginia nonstock corporation. The sole member of Inova Health Care Services is the Inova Health System Foundation, which is also a 501(c)(3) Virginia nonstock corporation. The corporate address for Inova Health Care Services is as follows:

**Inova Health Care Services
8095 Innovation Park Drive
Fairfax, VA 22031**

(a) In the case of proprietary corporation also attach:

- (1) A list of the names and addresses of the board of directors of the corporation.
- (2) A list of the officers of the corporation.
- (3) The name and address of the registered agent for the corporation.

Not applicable.

(b) In the case of a non-profit corporation also attach:

- (1) A list of the names and addresses of the board of directors of the corporation

Please see Attachment C for the names of the Inova Health System Foundation Board members. Please direct any questions to board members at the following address:

**c/o Nena Jaspers
8095 Innovation Park Drive
Fairfax, VA 22031**

- (2) A list of the officers of the corporation

The Inova Health System Foundation Board is charged with governance of the Inova hospitals.

The names of the board members and officers are set forth in Attachment C.

- (3) The name and address of the registered agent for the corporation

**CT Corporation System
4701 Cox Road, Suite 285
Glen Allen, VA 23060**

- (c) In the case of a partnership also attach:

- (1) A list of the names and addresses of all partners.
- (2) The name and address of the general or managing partner.

Not applicable.

- (d) In the case of other types of ownership, also attach such documents as will clearly identify the owner.

Not applicable.

- H. List all subsidiaries wholly or partially owned by the applicant.

Please see Attachment D for a comprehensive corporate organization chart for Inova Health System.

- I. List all organizations of which the applicant is wholly or partially owned subsidiary.

Inova Health System Foundation d/b/a Inova Health System.

- J. If the operator is other than the owner, attach a list of the names(s) and addresses of the operator(s) of the medical care facility project. In the case of a corporate

operator, specify the name and address of the Registered Agent. In the case of the partnership operator, specify the name and address of the general or managing partner.

Not applicable.

- K. If the operator is other than the owner, attach an executed copy of the contract or agreement between the owner and the operator of the medical care facility.

Not applicable.

SECTION II ARCHITECTURE AND DESIGN

A. Location of the Proposed Project

(1) Size of site: 85.31 acres

(2) Located in Loudoun County / Planning District 8 ("PD 8")
City/County/Planning District

(3) Address or directions 44045 Riverside Parkway, Leesburg, VA 20176

(4) Has site been zoned for type of use proposed

X Yes (attach copy of zoning or use permit)

Please see Attachments E.1, E.2 and E.3.

 No

If no, explain status _____

B. Type of project for which Certificate of Public Need is requested. (Check one)

(1) New construction

(2) X Remodeling/modernization of an existing facility

Expansion of ILH's MRI services through the addition of one MRI unit at the ILH main hospital.

(3) No construction or remodeling/modernization

(4) Other _____ (Identify)

C. Design of the facility

(1) Does the facility have a long range plan? If yes, attach a copy.

Long range planning is guided by the mission, vision, and values of the Inova Health System, set forth in Attachment F.

(2) Briefly describe the proposed project with respect to location, style and major design features, and the relationship of the current proposal to the long range plan.

The project will expand ILH's existing MRI services through the addition of one MRI unit to the existing MRI suite at the ILH main hospital, which is located at 44045 Riverside Parkway, Leesburg, Virginia. The proposed MRI unit will go into an existing shell space that was designed for a future MRI unit. The site plan, including the proposed location of the MRI unit and associated support space, can be found in Attachments G.1 and G.2 and the design drawing are included in Attachment H.

The project is consistent with the Inova Health System mission and vision (as identified above and set forth in Attachment F). This project relates to Inova Health System's commitment to excellence in patient care by improving the quality and accessibility of MRI services and is a necessary component for the continued operational success of ILH.

- (3) Describe the relationship of the facility to public transportation and highway access.

ILH is readily accessible and well-situated with respect to public and private transportation. Public bus transportation is available near the main patient entrance, and metro rail is available at the Innovation Center Metro Station via the Loudoun County Transit bus service. From the Capital Beltway (I-495), Leesburg Pike VA-7 West may be followed for approximately 20 miles to Claiborne Parkway/Lansdowne Boulevard, where hospital signs for ILH are first sighted.

- (4) Relate the size, shape, contour and location of the site to such problems as future expansion, parking, zoning and the provision of water, sewer and solid waste services.

The proposed MRI unit will be located in the existing MRI suite on the first floor of the ILH main hospital. The proposed MRI unit will go into an existing shell space that was designed for a future MRI unit. The site plan, including the proposed location of the MRI unit and associated support space, can be found in Attachments G.1 and G.2.

The site complies with all current applicable land development ordinances, regulations, and standards. Multiple vehicular access points from Riverside Parkway ensure convenient entry to the property, and adequate parking already exists for patients, visitors, and staff. Adequate public utilities—including water, sewer, and solid waste services—are currently available on site. No zoning changes are required to support this project.

- (5) If this proposal is to replace an existing facility, specify what use will be made of the existing facility after the new facility is completed.

Not applicable.

- (6) Describe any design features which will make the proposed project more efficient in terms of construction costs, operating costs or energy conservation.

The proposed MRI unit will be located in the existing MRI suite on the first floor of the ILH main hospital. The proposed MRI unit will go into an existing shell space that was designed for a future MRI unit.

The existing shell space is ideally situated to integrate the new MRI unit into established patient and staff workflow patterns. The existing imaging suite utilizes energy saving features in accordance with local building ordinances, including but not limited to occupancy sensor controlled lighting in support areas, and is compliant with local energy calculation requirements and specifications for high efficiency mechanical equipment, which contributes to energy conservation and reduces operating costs.

- D. Describe and document in detail how the facility will be provided with water, Sewer and solid waste services. Also describe power source to be used for heating and cooling purposes. Documentation should include, but is not limited to:

- (1) Letters from appropriate governmental agencies verifying the availability and adequacy of utilities,
- (2) National Pollution Discharge Elimination System permits,
- (3) Septic tank permits, or
- (4) Receipts for water and sewer connection and sewer connection fees.

Adequate public utilities currently exist on-site, including water, sewer and solid waste services, in addition to heating and cooling equipment. The project does not require additional utility services. Please see Attachments I.1, I.2 and I.3 for copies of recent utility bills for gas, water and electric.

- E. Space tabulation – (show in tabular form)

1. If Item #1 was checked in II-B, specify
 - a. The total number of square feet (both gross and net) in the proposed facility.

- b. The total number of square feet (both gross and net) by department and each type of patient room (the sum of the square footage in this part should equal the sum of the square footage in (a) above and should be consistent with any preliminary drawings, if available).

Not applicable.

- 2. If Item #2 was checked in II-B, specify:

- a. The total number of square feet (both gross and net) by department and each type of patient room in the existing facility.
- b. The total number of square feet (both gross and net) to be added to the facility.
- c. The total number square feet (both gross and net) to be remodeled, modernized or converted to another use.
- d. The total number of square feet (both gross and net) by department and each type of patient room in the facility upon completion. (The sum of square footage in this part should equal the sum of the square footages in parts (a) and (b) above and should be consistent with any preliminary drawings, if available. (The department breakdown should be the same as in (a) above.

Please see Attachment J.

- 3. Specify design criteria used or rationale for determining the size of the total facility and each department within the facility.

The proposed additional MRI unit will be located in the existing MRI suite at the ILH main hospital. The existing MRI suite has been sized to accommodate the necessary equipment and has a similar footprint to the imaging suites at other Inova Health System facilities.

- F. Attach a plot plan of the site which includes at least the following:

- 1. The courses and distances of the property line.
- 2. Dimensions and location of any buildings, structures, roads, parking areas, walkways, easements, right-of-way or encroachments on the site.

Please see Attachments G.1 and G.2.

- G. Attach a preliminary design drawing drawn to a scale of not less than 1/16"=1'0" showing the functional layout of the proposed project which indicates at least the following:

1. The layout of each typical functional unit.
2. The spatial relationship of separate functional components to each mechanical spaces.
3. Circulatory spaces (halls, stairwells, elevators, etc.) and mechanical spaces.

Please see Attachment H.

H. Construction Time Estimates

1. Date of Drawings: Preliminary **May 2026** Final **June 2026**
2. Date of Construction: Begin **Sept 2026*** Completion **March 2027**
3. Target Date of Opening: **Sept. 2027**

*** Construction to be initiated upon COPN issuance. Date used assumes COPN issuance September 2026.**

SECTION III

SERVICE DATA

- A. In brief narrative form describe the kind of services now provided and/or the kind services to be available after completion of the proposed construction or equipment installation.

ILH is a 211-bed community hospital serving the rapidly growing suburbs of Loudoun County. ILH has a rich history of proudly serving a growing and diverse community since 1912. The state-of-the-art technology at our main campus in Lansdowne is complemented by our outpatient locations throughout Loudoun County. ILH continues to enhance its capabilities allowing patients to receive care closer to home.

- **ILH is home to Loudoun County’s only designated trauma center.**
- **ILH opened a Surgical Trauma ICU in 2020 to support its trauma program.**
- **Inova Children’s Emergency Room at ILH is Loudoun County’s only emergency room (“ER”) solely dedicated to caring for children.**
- **ILH operates two additional 24/7 freestanding ERs in Loudoun County, one in Leesburg and one in Ashburn.**
- **ILH provides comprehensive women’s care and a Level IIIB NICU.**
- **ILH has a 22-bed inpatient behavioral health unit on the Inova Leesburg Medical Campus.**
- **ILH provides comprehensive cancer, heart and vascular services and neurologic and stroke care.**

ILH’s radiology department offers comprehensive imaging services, including CT, MRI, digital mammography, fluoroscopy, interventional radiology, nuclear medicine, ultrasound, and x-ray.

ILH maintains two MRI units for diagnostic imaging: one MRI unit is located at the ILH main hospital in Lansdowne, and one MRI unit is located on the Inova Leesburg Medical Campus. The Inova Leesburg Medical Campus is located approximately 7.5 miles from the ILH main hospital. This project proposes the expansion of MRI capacity at the ILH main hospital through the addition of a second MRI unit based on institution-specific need. Approval of the proposed project would bring ILH’s total complement of MRI units to three.

The MRI unit at the ILH main hospital is utilized primarily for inpatient and emergency department patients as well as complex outpatients. Scanning is provided to inpatients and emergency department patients 24 hours a day, 7 days per week and is provided to outpatients on a scheduled basis Monday through Friday from 7:00 a.m. to 7:00 p.m., and on Saturday and Sunday from 7:00 a.m. to 5:00 p.m.

Utilization of ILH's two MRI units is exceptionally heavy. In 2024, ILH's two MRI units performed a total of 13,009 procedures, for an average of 6,505 MRI procedures per unit, placing utilization at 130% of the State Medical Facilities Plan ("SMFP") utilization standard of 5,000 procedures per MRI unit. Volume on the two MRI units grew to 14,999 MRI procedures in 2025, for an average of 7,500 MRI procedures per unit, placing utilization at 150% of the SMFP standard.

The MRI unit at the ILH main hospital is extremely busy, with average utilization of 178% of the SMPF standard in 2025. In order to meet existing and future ILH patient need for MRI services, ILH seeks COPN approval to expand its MRI services through the addition of one MRI unit at the ILH main hospital. As the home of Loudoun County's only designated trauma center, ILH must always have adequate MRI capacity available to treat its patient population. The addition of one MRI unit will address the high utilization of the existing MRI units and related capacity constraints and ensure adequate MRI services are available to care for the ILH patient population as it continues to grow.

- B. Specify the historical and projected utilization of the facility using the following format:

	Historical Utilization			Projected Two Years Following	
	2023	2024	2025	2028	2029
<i><u>Inpatient Total</u></i>					
Total Licensed Beds	211	211	211	211	259
Total Patient Days	57,723	61,064	69,508	73,969	75,486
Total Occupancy %	75%	79%	90%	96%	80%
Total Discharges	14,336	15,463	17,995	19,150	19,543
Average Length of Stay	4.0	3.9	3.9	3.9	3.9
<i><u>Medical/Surgical (SMFP 80% Occupancy)</u></i>					
Total Licensed Beds	128	128	134	134	182
Total Patient Days	38,722	40,679	48,894	52,032	53,099
Total Occupancy %	83%	87%	100%	106%	80%
Total Discharges	8,053	8,594	10,716	11,404	11,638
Average Length of Stay	4.8	4.7	4.6	4.6	4.6
<i><u>Adult ICU (SMFP 65% Occupancy)</u></i>					
Total Licensed Beds	23	23	23	23	23
Total Patient Days	5,620	5,901	5,945	6,327	6,456
Total Occupancy %	67%	70%	71%	75%	77%
Total Discharges	2,193	2,257	2,379	2,532	2,584
Average Length of Stay	2.6	2.6	2.5	2.5	2.5
<i><u>Pediatric (SMFP 80% Occupancy)</u></i>					
Total Licensed Beds	14	14	8	8	8
Total Patient Days	1,813	1,716	1,750	1,862	1,901
Total Occupancy %	35%	34%	60%	64%	65%
Total Discharges	535	619	758	807	823
Average Length of Stay	3.4	2.8	2.3	2.3	2.3
<i><u>Obstetric (SMFP 80% Occupancy)</u></i>					
Total Licensed Beds	24	24	24	24	24
Total Patient Days	5,580	6,329	6,332	6,738	6,877
Total Occupancy %	64%	72%	72%	77%	78%
Total Discharges	2,616	2,955	3,140	3,342	3,410
Average Length of Stay	2.1	2.1	2.0	2.0	2.0
<i><u>Psychiatric Adult (SMFP 75% Occupancy)</u></i>					
Total Licensed Beds	22	22	22	22	22
Total Patient Days	5,988	6,439	6,587	7,010	7,154
Total Occupancy %	75%	80%	82%	87%	89%
Total Discharges	939	1,038	1,002	1,066	1,088
Average Length of Stay	6.4	6.2	6.6	6.6	6.6
<i><u>Subtotal Med/Surg (Adult + Peds + OB) (SMFP 80% Occupancy)</u></i>					
Total Licensed Beds	166	166	166	166	214
Total Patient Days	46,115	48,724	56,976	60,632	61,876
Total Occupancy %	76%	80%	94%	100%	79%
Total Discharges	11,204	12,168	14,614	15,552	15,871
Average Length of Stay	4.1	4.0	3.9	3.9	3.9
<i><u>Subtotal Med/Surg (Adult + Peds + OB + ICU) (SMFP % Occupancy Varies)</u></i>					
Total Licensed Beds	189	189	189	189	237
Total Patient Days	51,735	54,625	62,921	66,959	68,332
Total Occupancy %	75%	79%	91%	97%	79%
Total Discharges	13,397	14,425	16,993	18,083	18,454
Average Length of Stay	3.9	3.8	3.7	3.7	3.7

Note, the increase in the number of adult medical/surgical beds between 2028 and 2029 (134 beds to 182 beds) shown in the table above reflects the addition of 48 beds, which is subject to approval of the separately pending COPN Request No. VA-8866.

Inpatient Bed Projection Methodology

The Weldon Cooper Center for Public Service, Demographic Research Group, projects that, between 2025 and 2030, the population of Loudoun County, which roughly equates to ILH's primary service area ("PSA"), is expected to grow at a compound annual growth rate of 2.1%.

Using 2025 as a baseline, ILH conservatively projects that inpatient discharges will grow at a rate consistent with Loudoun County's population growth and length of stay will remain constant.

Population Projections

	2025	2026	2027	2028	2029	2030
Population Projections - Loudoun County	448,818	458,418	468,019	477,620	487,220	496,821
Population Growth	2.2%	2.1%	2.1%	2.1%	2.0%	2.0%

Source: Weldon Cooper

- C. State assumptions and show methodology used to calculate projections for two years following completion of the proposed project.

The historical and projected utilization of ILH's MRI units are as follows:

	Historical Utilization			Projected Utilization	
	2023	2024	2025	Yr 1: 2028	Yr 2: 2029

MRI Scanners

ILH Main Hospital	1	1	1	2	2
ILH Imaging Center - Leesburg	1	1	1	1	1
ILH Total	2	2	2	3	3

MRI Scans (procedures)

ILH Main Hospital	6,329	7,333	8,886	9,587	9,910
ILH Imaging Center - Leesburg	5,036	5,676	6,113	6,375	6,375
ILH Total	11,365	13,009	14,999	15,962	16,285

% of SMFP (5,000 procedures per unit)

ILH Main Hospital	127%	147%	178%	96%	99%
ILH Imaging Center - Leesburg	101%	114%	122%	127%	127%
ILH Total	114%	130%	150%	106%	109%

MRI Projection Methodology

As described in Section III.B, the Weldon Cooper Center for Public Service, Demographic Research Group, projects that, between 2025 and 2030, the population of Loudoun County, which roughly equates to ILH's PSA, is expected to grow at a compound annual growth rate of 2.1%. ILH conservatively projects that its total MRI volume will grow at a rate consistent with Loudoun County's projected population growth.

As this project proposes a second MRI unit on the main campus, ILH has assumed that incremental growth will be accommodated on the main campus given the presence of two MRI units.

The addition of one MRI unit at the ILH main hospital will address the high utilization of the existing MRI units and related capacity constraints and ensure adequate MRI services are available to care for the ILH patient population.

D. Existing and/or Proposed Bed Complement

This proposed project will not impact the ILH bed complement, which is as follows:

<i>Inova Loudoun Hospital</i>	Distribution of Existing Licensed Beds	Total Beds to be Built ¹	Total Beds to be Lost or Removed from Service	Total Beds After Construction ¹
Adult Medical/Surgical	134	48		182
Adult Critical Care	23			23
Obstetrical	24			24
Pediatric Medical/Surgical	8			8
Pediatric Critical Care	n/a			n/a
Psychiatric	22			22
Long-Term/Extended Care	n/a			n/a
Self-Care	n/a			n/a
Acute Rehabilitation	n/a			n/a
TOTAL	211	48		259
Neonatal Intensive Care	12			12
Other Newborn Bassinets	25			25

¹ Reflects the addition of 48 adult medical/surgical beds, which is subject to approval of the separately pending COPN Request No. VA-8866.

E. Facilities and Services to be Provided (Check)

The following services are currently provided at ILH:

<i>Inova Loudoun Hospital</i>	Existing	This Project to be Added	This Project to be Discontinued	This Project to be Expanded or Renovated
1. Post-Operative Recovery Room	X			
2. Intensive Care Unit Cardiac	X			
3. Open Heart Surgery Facilities				
4. Pharmacy	X			
With full-time pharmacists				
With part-time pharmacists				
5. Diagnostic radiological services	X			
x-ray				
Ultrasonography	X			
Radioisotope	X			
CT scanning	X			
MRI scanning	X			X
6. Therapeutic Radiological Services	X			
Brachytherapy				
Specify Source(s) Used	Linear Accelerator			
Teletherapy				
Specify Source(s) or Type(s) of Equipment Used				
7. Clinical Pathology Laboratory	X			
8. Organ Bank				
9. Blood Bank	X			
10. Electroencephalography	X			
11. Electrocardiography	X			
12. Respiratory Therapy	X			
13. Premature Nursery	X			
14. Self-Care Unit				

<i>Inova Loudoun Hospital</i>	Existing	This Project to be Added	This Project to be Discontinued	This Project to be Expanded or Renovated
15. Skilled Nursing or Long-Term Nursing	X			
16. Renal Dialysis acute	X			
Chronic	X			
Inpatient	X			
Outpatient	X			
Home dialysis training				
17. Burn Care Unit				
18. Physical Therapy Department	X			
19. Occupational Therapy	X			
20. Medical Rehabilitation				
Inpatient				
Outpatient	X			
21. Tuberculosis Unit				
22. Psychiatric Services				
Inpatient	X			
Outpatient	X			
Partial hospitalization program				
Emergency services	X			
Foster and/or home care				
Consultation				
23. Clinical psychology	X			
24. Organized outpatient department	X			
25. Outpatient surgery	X			
26. Social work department	X			
27. Family planning service				
28. Genetic counseling service	X			
29. Abortion services	X			
Inpatient				
Outpatient				

<i>Inova Loudoun Hospital</i>	Existing	This Project to be Added	This Project to be Discontinued	This Project to be Expanded or Renovated
30. Pediatric department	X			
31. Obstetric service	X			
32. Alcoholic & detoxification department	X			
33. Home care department				
34. Speech pathology services	X			
35. Audiology services	X			
36. Hospital auxiliary	X			
37. Volunteer service department	X			
38. Paramedical training program				
39. Emergency department	X			
40. Dental services (oral surgery)	X			
41. Podiatric services	X			
42. Pre-admission testing	X			
43. Pre-discharge planning	X			
44. Multi phasic screening	X			
45. Other (identify) Inpatient medical-surgical services	X			

- F. Staffing of Existing and/or Proposed Facility
In the following categories, indicate the number of full time equivalent personnel (at least 35 hours per week).

ILH's MRI staffing needs are as follows:

Staffing Category	Current Staffing		Additional Full Time	Total Needed
	Full Time Equivalent	Vacant Positions		
ILH Main Hospital				
MRI Technologist	4.8	0	1	5.8
Clinical Technicians	4.3	0	0.5	4.8
ILH Leesburg Medical Campus				
MRI Technologist	3.44	0	0	3.44
Clinical Technicians	2.64	1	0	3.64

- G. Present a plan for obtaining all additional personnel required to staff the project following completion and identify the sources from which such personnel are expected to be obtained.

ILH does not anticipate difficulty meeting the hiring needs for the proposed expansion of MRI services.

Inova maintains two partnerships with MRI training programs where students perform clinical training at Inova facilities. Inova staff is also cross-trained so many x-ray technicians become MRI technicians through on the job training.

As a general matter, Inova maintains a robust recruitment and retention program focused on bringing in top talent from within and outside of the Northern Virginia region. It is proud to offer team members a robust benefits package that supports professional growth and development through monetary support for professional degrees and certifications.

Inova Health System's plan for obtaining additional personnel includes:

- **Recruiting initiatives targeted at labor pools which have historically been underutilized in the health care industry (e.g., minorities, seniors, retired military personnel, etc.), thereby expanding the pool of available workers, not draining resources from other facilities.**
- **Recruiting in geographic areas well outside Northern Virginia, thereby expanding the pool of available workers, without draining resources from other Northern Virginia facilities.**
- **Continuing initiatives to bolster the size and quality of the health services labor pool in Northern Virginia over the long-term by promoting health care career paths among area youth, benefitting all area health care providers with a vibrant and enthusiastic labor pool.**

- H. Describe the anticipated impact that the project will have on the staffing of other facilities in the service area.

The staffing requirements for this project are limited to 1.5 FTEs and are not anticipated to have an impact on the staffing of other facilities in the service area.

- I. Attach the following information or documents

1. Roster of medical staff (existing facilities). Indicate their specialty, board Certification, Board eligibility, and staff privileges (active, associate, etc.)

Please see Attachment K.

2. Existing Facilities- Attach copy(ies) of letter of endorsement from the medical staff organization indicating the medical need for the proposed project.

Please see Attachment L.

3. Copy of most recent licensing report from State Agency (existing facilities).

Please see Attachments M.1 and M.2.

4. Current accreditation status and copy of the latest accreditation report from the Joint Commission on Accreditation of Hospitals (existing facilities).

Please see Attachments N.1, N.2 and N.3.

SECTION IV PROJECT JUSTIFICATION AND IDENTIFICATION OF COMMUNITY NEED

A. Please provide a comprehensive narrative description of the proposed project.

ILH is a 211-bed community hospital serving the rapidly growing suburbs of Loudoun County. ILH has a rich history of proudly serving a growing and diverse community since 1912. The state-of-the-art technology at our main campus in Lansdowne is complemented by our outpatient locations throughout Loudoun County. ILH continues to enhance its capabilities allowing patients to receive care closer to home.

- **ILH is home to Loudoun County’s only designated trauma center.**
- **ILH opened a Surgical Trauma ICU in 2020 to support its trauma program.**
- **Inova Children’s Emergency Room at ILH is Loudoun County’s only emergency room (“ER”) solely dedicated to caring for children.**
- **ILH operates two additional 24/7 freestanding ERs in Loudoun County, one in Leesburg and one in Ashburn.**
- **ILH provides comprehensive women’s care and a Level IIIB NICU.**
- **ILH has a 22-bed inpatient behavioral health unit on the Inova Leesburg Medical Campus.**
- **ILH provides comprehensive cancer, heart and vascular services and neurologic and stroke care.**

COPN Request No. VA-8882 proposes the expansion of ILH’s MRI services through the addition of one MRI unit at the ILH main hospital. An MRI scan is a noninvasive way to show bleeding or swelling in a given region of the body. An MRI produces high-resolution images inside of the body that can help diagnose a variety of conditions or injuries, such as brain aneurysms, stroke, tumors, joint abnormalities caused by traumatic or repetitive injuries such as torn cartilage or ligaments, disk abnormalities in the spine, or bone infections. Furthermore, cardiac MRI scans are beneficial to patients who wish to avoid harmful radiation from x-rays and show clearer images of the soft tissues of the body. MRI scans are unique in their ability to calculate blood flow through the blood vessels. MRI scans are considered the most effective tests for measuring the pumping of blood through the heart.

ILH’s radiology department offers comprehensive imaging services, including CT, MRI, digital mammography, fluoroscopy, interventional radiology, nuclear medicine, ultrasound, and x-ray.

ILH maintains two MRI units for diagnostic imaging: one MRI unit is located at the ILH main hospital in Lansdowne, and one MRI unit is located on the Inova Leesburg Medical Campus. The Inova Leesburg Medical Campus is located approximately 7.5 miles from the ILH main hospital. This project

proposes the expansion of MRI capacity at the ILH main hospital through the addition of a second MRI unit based on institution-specific need. Approval of the proposed project would bring ILH's total complement of MRI units to three.

The MRI unit at the ILH main hospital is utilized primarily for inpatient and emergency department patients as well as complex outpatients. Scanning is provided to inpatients and emergency department patients 24 hours a day, 7 days per week and is provided to outpatients on a scheduled basis Monday through Friday from 7:00 a.m. to 7:00 p.m., and on Saturday and Sunday from 7:00 a.m. to 5:00 p.m.

Utilization of ILH's two MRI units is exceptionally heavy. In 2024, ILH's two MRI units performed a total of 13,009 procedures, for an average of 6,505 MRI procedures per unit, placing utilization at 130% of the SMFP utilization standard of 5,000 procedures per MRI unit. Volume on the two MRI units grew to 14,999 MRI procedures in 2025, for an average of 7,500 MRI procedures per unit, placing utilization at 150% of the SMFP standard.

The MRI unit at the ILH main hospital is extremely busy, with average utilization of 178% of the SMPF standard in 2025. In order to meet existing and future ILH patient need for MRI services, ILH seeks COPN approval to expand its MRI services through the addition of one MRI unit at the ILH main hospital. As the home of Loudoun County's only designated trauma center, ILH must always have adequate MRI capacity available to treat its patient population. The addition of one MRI unit will address the high utilization of the existing MRI units and related capacity constraints and ensure adequate MRI services are available to care for the ILH patient population as it continues to grow.

The proposed MRI will also be utilized for cardiac MRI scans for the patients at ILH. Cardiac MRI scans are beneficial to patients who wish to avoid harmful radiation from x-ray scans and show clearer images of the soft tissues of the body. The scan is unique in its ability to calculate blood flow through the blood vessels. Blurring of the image due to movement of the heart and blood vessels can be overcome by scanning in time with the heartbeat. **MRI is considered to be the most effective test for measuring the pumping of blood through the heart.**

B. Identification of Community Need

1. Describe the geographic boundaries of the facility's primary service area. (Note: Primary service area may be considered to be geographic area from which 75% of patients are expected to originate.)

Please see Attachment O to view a map outlining the primary service area for ILH's MRI services.

2. Provide patient origin, discharge diagnosis or utilization data appropriate for the type of project being proposed.

Please see Attachment P for 2025 patient origin data for ILH's MRI services.

- C. 1. Is (are) the services(s) to be offered presently being offered by any other existing facility(ies) in the Health Planning Region?

Yes

2. If yes,

- a. Identify the facility(ies)

Please see Attachment Q for a map and list of existing MRI services in PD 8.

- b. Discuss the extent to which the facility(ies) satisfy(ies) the current demand for the services(s)

ILH has an institution-specific need to expand its existing MRI services. In 2024, ILH's two MRI units performed a total of 13,009 procedures, for an average of 6,505 MRI procedures per unit, placing utilization at 130% of the SMFP utilization standard of 5,000 procedures per MRI unit. Volume on the two MRI units grew to 14,999 MRI procedures in 2025, for an average of 7,500 MRI procedures per unit, placing utilization at 150% of the SMFP standard.

The MRI unit at the ILH main hospital is extremely busy, with average utilization of 178% of the SMPF standard in 2025.

To ensure adequate access to MRI services for its patient population, ILH seeks COPN approval to expand its MRI services through the addition of one MRI unit at the ILH main hospital. As the home of Loudoun County's only designated trauma center, ILH must always have adequate MRI capacity available to treat its patient population. As the population continues to grow in PD 8, and more specifically in ILH's service area, the demand for MRI services will continue to increase. Approval of an additional MRI unit is necessary to support existing and future demand for MRI services.

- c. Discuss the extent to which the facility(ies) will satisfy(ies) the demand for services in five years.

As the population of ILH's service area continues to grow, demand for MRI services will continue to increase over the next five years and beyond. ILH seeks approval to expand its MRI services so that it can meet the current and future demand for MRI services.

- D. Discuss how the project will fill an unmet need in the delivery of health care in the service area including, where applicable, geographic barriers to access.

ILH has an institution-specific need to expand its existing MRI services. In 2024, ILH's two MRI units performed a total of 13,009 procedures, for an average of 6,505 MRI procedures per unit, placing utilization at 130% of the SMFP utilization standard of 5,000 procedures per MRI unit. Volume on the two MRI units grew to 14,999 MRI procedures in 2025, for an average of 7,500 MRI procedures per unit, placing utilization at 150% of the SMFP standard.

The MRI unit at the ILH main hospital is extremely busy, with average utilization of 178% of the SMPF standard in 2025. The addition of one MRI unit will address the high utilization of the existing MRI units and related capacity constraints and ensure adequate MRI services are available to care for the ILH patient population as it continues to grow.

- E. Discuss the consistency of the proposed project with applicable Regional Health Plan, State Health Plan, State Medical Facilities Plan, or other plans promulgated by State Agencies.

The project is consistent with the applicable provisions of the SMFP.

Article 2. Criteria and Standards for Magnetic Resonance Imaging

12VAC5-230-140. Travel time.

MRI services should be within 30 minutes driving time one way under normal conditions of 95% of the population of the health planning district using a mapping software as determined by the commissioner.

MRI services are currently available within 30 minutes driving time one way under normal conditions of 95% of the population in PD 8. Difficult and challenging traffic congestion in Northern Virginia frequently results in much longer travel times. As the Northern Virginia population continues to grow, drive times are expected to become even more lengthy and challenging.

The proposed project involves the addition of one MRI unit at the ILH main hospital in an existing MRI suite based on institution-specific need. The proposed project will improve access to MRI services in PD 8 by increasing needed capacity at the largest and busiest hospital in Loudoun County. **The addition of one MRI unit will decompress existing MRI service volumes at the ILH main hospital and ensure adequate MRI capacity is available to care for the ILH patient population as it continues to grow.**

12VAC5-230-150. Need for new fixed site service.

No new fixed site MRI services should be approved unless fixed site MRI services in the health planning district performed an average of 5,000 procedures per existing and approved fixed site MRI scanner during the relevant reporting period and the proposed new service would not significantly reduce the utilization of existing fixed site MRI providers in the health planning district. The utilization of existing scanners operated by a hospital and serving an area distinct from the proposed new service site may be disregarded in computing the average utilization of MRI scanners in such health planning district.

Not applicable. ILH is proposing to expand its existing fixed site MRI services.

12VAC5-230-160. Expansion of fixed site service.

Proposals to expand an existing medical care facility's MRI services through the addition of an MRI scanner may be approved when the existing service performed an average of 5,000 MRI procedures per scanner during the relevant reporting period. The commissioner may authorize placement of the new unit at the applicant's existing medical care facility, or at a separate location within the applicant's primary service area for MRI services, provided the proposed expansion is not likely to significantly reduce the utilization of existing providers in the health planning district.

ILH maintains two MRI units for diagnostic imaging: one MRI unit is located at the ILH main hospital in Lansdowne, and one MRI unit is located on the Inova Leesburg Medical Campus. The Inova Leesburg Medical Campus is located approximately 7.5 miles from the ILH main hospital. This project proposes the expansion of MRI capacity at the ILH main hospital through the addition of a second MRI unit based on institution-specific need. Approval of the proposed project would bring ILH's total complement of MRI units to three.

The MRI unit at the ILH main hospital is utilized primarily for inpatient and emergency department patients as well as complex outpatients. Scanning is provided to inpatients and emergency department patients 24 hours a day, 7 days per week and is provided to outpatients on a scheduled basis Monday through Friday from 7:00 a.m. to 7:00 p.m., and on Saturday and Sunday from 7:00 a.m. to 5:00 p.m.

Utilization of ILH's two MRI units is exceptionally heavy. In 2024, ILH's two MRI units performed a total of 13,009 procedures, for an average of 6,505 MRI procedures per unit, placing utilization at 130% of the SMFP utilization standard of 5,000 procedures per MRI unit. Volume on the two MRI units grew to 14,999 MRI procedures in 2025, for an average of 7,500 MRI procedures per unit, placing utilization at 150% of the SMFP standard.

The MRI unit at the ILH main hospital is extremely busy, with average utilization of 178% of the SMPF standard in 2025. In order to meet existing and future ILH patient need for MRI services, ILH seeks COPN approval to expand its MRI services through the addition of one MRI unit at the ILH main hospital. As the home of Loudoun County's only designated trauma center, ILH must always have adequate MRI capacity available to treat its patient population. The addition of one MRI unit will address the high utilization of the existing MRI units and related capacity constraints and ensure adequate MRI services are available to care for the ILH patient population as it continues to grow.

ILH does not expect the expansion of MRI services to negatively impact other existing MRI providers in PD 8 because it is proposed solely on the basis of institution-specific need to serve ILH's existing patient population.

12VAC5-230-170. Adding or expanding mobile MRI services.

- A. Proposals for mobile MRI scanners demonstrate that, for the relevant reporting period, at least 2,400 procedures were performed and that the proposed mobile unit will not significantly reduce the utilization of existing MRI providers in the health planning district. Not applicable. The project does not involve adding or expanding mobile MRI services.*

Not applicable. The project does not involve adding or expanding mobile MRI services.

- B. Proposals to convert authorized mobile MRI scanners to fixed site scanners shall demonstrate that, for the relevant reporting period, 3,000 procedures were performed by the mobile scanner and that the proposed conversion will not significantly reduce the utilization of existing MRI providers in the health planning district.*

Not applicable. The project does not involve the conversion of mobile MRI services.

12VAC5-230-180. Staffing.

MRI services should be under the direct supervision of one or more qualified physicians.

Inova's MRI services are under the direct supervision of board-certified and trained radiologists.

12VAC5-230-80. When institutional expansion needed.

- A. Notwithstanding any other provisions of this chapter, the commissioner may grant approval for the expansion of services at an existing medical care facility in a health planning district with an excess supply of such services when the proposed expansion can be justified on the basis of a facility's need having exceeded its current service capacity to provide such service or on the geographic remoteness of the facility.*

ILH maintains two MRI units for diagnostic imaging: one MRI unit is located at the ILH main hospital in Lansdowne, and one MRI unit is located on the Inova Leesburg Medical Campus. The Inova Leesburg Medical Campus is located approximately 7.5 miles from the ILH main hospital. This project proposes the expansion of MRI capacity at the ILH main hospital through the addition of a second MRI unit based on institution-specific need. Approval of the proposed project would bring ILH's total complement of MRI units to three.

In 2024, ILH's two MRI units performed a total of 13,009 procedures, for an average of 6,505 MRI procedures per unit, placing utilization at 130% of the SMFP utilization standard of 5,000 procedures per MRI unit. Volume on the two MRI units grew to 14,999 MRI procedures in 2025, for an average of 7,500 MRI procedures per unit, placing utilization at 150% of the SMFP standard.

The MRI unit at the ILH main hospital is extremely busy, with average utilization of 178% of the SMPF standard in 2025. A second MRI unit at the ILH main hospital is necessary to address the high utilization of the existing MRI units and related capacity constraints and ensure timely access to MRI services for the ILH patient population.

- B. If a facility with an institutional need to expand is part of a health system, the underutilized services at other facilities within the health system should be reallocated, when appropriate, to the facility with the institutional need to expand before additional services are approved for the applicant. However, underutilized services located at a health system's geographically remote facility may be disregarded when determining institutional need for the proposed project.*

Location Type	Facility	Authorized MRI Units	# MRI Procedures		% of SMFP (Based on Authorized Units)	
			2024	2025	2024	2025
Hospitals	Inova Alexandria Hospital (IAH)	2	9,543	10,003	95%	100%
	Inova Fairfax Hospital (IFMC)	4	18,984	19,983	95%	100%
	Inova Mount Vernon Hospital (IMVH)	1	5,809	6,902	116%	138%
	Inova Loudoun Hospital (ILH)	1	7,333	8,886	147%	178%
	Inova Fair Oaks Hospital (IFOH)	2	9,347	11,416	93%	114%
Hospital Total		10	51,016	57,190	102%	114%
Imaging Centers	Inova Diagnostic Imaging Ctr- Leesburg (Department of ILH)	1	5,676	6,113	114%	122%
	Inova Franconia Springfield HealthPlex (Department of IAH)	1	4,494	4,654	90%	93%
	Inova Imaging Center- Mark Center (Department of IAH)	1	3,298	3,645	66%	73%
	Inova Center for Personalized Health (Department of IFMC)	6	37,704	38,251	126%	128%
	Inova Lorton HealthPlex (Department of IMVH)	1	3,574	4,354	71%	87%
Imaging Centers Total		10	54,746	57,017	109%	114%
Total Inova		20	105,762	114,207	106%	114%

In 2025, the average utilization of Inova's MRI units was 114% of the SMFP standard. Moving an existing MRI unit from one of the Inova hospitals to the ILH main hospital would create an immediate need to backfill MRI capacity at the original hospital. Therefore, it is not reasonable to relocate an existing MRI unit from one of the other Inova hospitals to the ILH main hospital.

- F. Show how the method and assumptions used in determining the need for additional beds, new services or deletion of service in the proposed project's service area.

Please see the responses to Sections III.B and III.C. Inova conservatively projects MRI volume will increase at a rate consistent with Loudoun County's population growth.

- G. Coordination and Affiliation with Other Facilities.

Describe any existing or proposed formal agreements or affiliations to share personnel, facilities, services or equipment. (Attach copies of any formal agreements with another health or medical care facility.)

Inova Health System is a broad-based regional healthcare system and provides a comprehensive and coordinated range of acute, ambulatory, and tertiary services.

- H. Attach copies of the following documents:

1. A map of the service area indicating:

- a. Location of the proposed project.
- b. Location of other existing medical facilities (by name, type, hospital, nursing home, outpatient clinic, etc.) and number of beds in each inpatient facility).

Please see Attachment Q.

- 2. Any material which indicates community and professional support for this project; i.e. letter of endorsement from physicians, community organizations, local government, Chamber of Commerce, medical society, etc.

Please see Attachment R.

- 3. Letters to other area facilities advising of the scope of the proposed project.

Please see Attachment S.

SECTION V**FINANCIAL DATA**

It will be the responsibility of the applicant to show sufficient evidence of adequate financial resources to complete construction of the proposed project and provide sufficient working capital and operating income for a period of not less than one (1) year after the date of opening:

- A. Specify the per diem rate for all existing negotiated reimbursement contracts and proposed contracts for patient care with state and federal governmental agencies, Blue Cross/Blue Shield Plans, labor organizations such as health and welfare funds and membership associations.

This question requires the disclosure of confidential and proprietary information.

- B. Does the facility participate in a regional program which provides a means for facilities to compare its costs and operations with similar institutions?

 X Yes No

If yes, specify program and provide a copy of report(s) which provide(s) the basis for comparison.

All Inova Health System facilities participate in VHI. Please see Attachments T.1-T.4 for copies of ILH's and ILH's Imaging Center Leesburg EPICS submission for 2023 and 2024.

- C. Estimated Capital Costs

Please see "Instructions for Completing Estimated Capital Costs" Section of the Certificate of Need application for detailed instructions for completing this question (attached)

Part I – Direct Construction Costs

1.	Cost of materials	<u>\$1,200,000</u>
2.	Cost of labor	<u>\$0</u>
3.	Equipment included in construction contract	<u>\$0</u>
4.	Builder's overhead	<u>\$0</u>
5.	Builder's profit	<u>\$0</u>
6.	Allocation for contingencies	<u>\$137,000</u>

7. Sub-total (add lines 1 thru 6) **\$1,337,000**

Part II – Equipment Not Included in Construction Contract

If leasehold, lease expense over entire term of lease
(List each separately)

8. a. **Equipment** **\$2,625,992**
b. **Furnishings** **\$9,030**
c. **Signage** **\$5,600**
d. **Data & Tele** **\$81,760**
e. _____ \$ _____

9. Sub-total (add lines 8a thru 8e) **\$2,722,382**

Part III – Site Acquisition Costs

10. Full purchase price **\$0**
11. For sites with standing structures **\$0**
a. purchase price allocable to structures **\$0**
b. purchase price allocable to land **\$0**
12. Closing costs **\$0**
13. If leasehold, lease expense over entire term of lease **\$0**
14. Additional expenses paid or accrued:
a. _____ **\$0**
b. _____ **\$0**
c. _____ **\$0**

15. Sub-total (add lines 10 thru 14c) **\$0**

Part IV – Site Preparation Costs

16. Earth work **\$7,725**

17.	Site utilities	<u>\$29,875</u>
18.	Roads and walks	<u>\$0</u>
19.	Lawns and planting	<u>\$0</u>
20.	Unusual site conditions:	
	a. _____	<u>\$0</u>
	b. _____	<u>\$0</u>
21.	Accessory structures	<u>\$0</u>
22.	Demolition costs	<u>\$0</u>
23.	Sub-total (add lines 16 thru 22)	<u>\$37,600</u>

Part V – Off-site Costs (List each separately)

24.	_____	<u>\$0</u>
25.	_____	<u>\$0</u>
26.	_____	<u>\$0</u>
27.	_____	<u>\$0</u>
28.	Sub-total (add lines 24 thru 27)	<u>\$0</u>

Part VI – Architectural and Engineering Fees

29.	Architect's design fee	<u>\$214,641</u>
30.	Architect's supervision fee	<u>\$0</u>
31.	Engineering fees	<u>\$123,750</u>
32.	Consultant's fees	<u>\$108,830</u>
33.	Sub-total (add lines 29 thru 32)	<u>\$447,221</u>

Part VII – Other Consultant Fees (List each separately)

34.	a. _____	<u>\$0</u>
-----	----------	-------------------

b. _____ **\$0**

c. _____ **\$0**

35. Sub-total (add lines 34a thru 34c) **\$0**

Part VIII – Taxes During Construction

36. Property taxes during construction **\$0**

34. List other taxes:

a. _____ **\$0**

b. _____ **\$0**

38. Sub-total (add lines 36 thru 37b) **\$0**

Part IX-A – HUD Section 232 Financing

39. Estimated construction time (in months) **n/a**

40. Dollar amount of construction loan **\$0**

41. Construction loan interest rate **n/a**%

42. Estimated construction loan interest costs **\$0**

43. Term of financing (in years) **n/a**

44. Interest rate on permanent loan **n/a** %

45. FHA mortgage insurance premium **\$0**

46. FHA mortgage fees **\$0**

47. Financing fees **\$0**

48. Placement fees **\$0**

49. AMPO (non-profit only) **\$0**

50. Title and recording fees **\$0**

51. Legal fees **\$0**

52. Total interest expense on permanent mortgage loan \$0
53. Sub-total Part IX-A HUD Section 232 Financing (add lines 42, 45, 46, 47, 48, 49, 50 and 51) \$0

Part IX-B – Industrial Development Authority Revenue and General
Obligation Bond Financing

(Circle selected method of financing)

54. Method of construction financing (construction loan, proceeds of bond sales, if other, specify) n/a – using accumulated reserves
- If construction is to be financed from any source other than bond sale proceeds, answer question 56 through 58. Otherwise, proceed to question 59.
55. Estimated construction time (in months) n/a
56. Dollar amount of construction loan \$0
57. Construction loan interest rate n/a%
58. Estimated construction loan interest cost \$0
59. Nature of bond placement (direct, underwriter, if other, specify) n/a
60. Will bonds be issued prior to the beginning of construction? _____ Yes _____ No n/a
61. If the answer to question 60 is yes, how long before in months? n/a
62. Dollar amount of bonds expected to be sold prior to the beginning of construction \$0
63. Will principal and interest be paid during construction or only interest? n/a
64. Bond interest expense prior to the beginning of construction(in dollars) \$0
65. How many months after construction

	begins will last bond be sold?	<u>n/a</u>	
66.	Bond interest expense during construction		<u>\$0</u>
67.	What percent of total construction will be financed from bond issue?		<u>\$0</u>
68.	Expected bond interest rate	<u>n/a</u> %	
69.	Anticipated term of bond issued (in years)	<u>n/a</u>	
70.	Anticipated bond discount (in dollars)	<u>n/a</u>	
71.	Legal costs		<u>\$0</u>
72.	Printing costs		<u>\$0</u>
73.	Placement fee		<u>\$0</u>
74.	Feasibility study		<u>\$0</u>
75.	Insurance		<u>\$0</u>
76.	Title and recording fees		<u>\$0</u>
77.	Other fees (list each separately)		
	a. _____		<u>\$0</u>
	b. _____		<u>\$0</u>
	c. _____		<u>\$0</u>
78.	Sinking fund reserve account (Debt Service Reserve)		<u>\$0</u>
79.	Total bond interest expenses (in dollars)		<u>\$0</u>
80.	Sub-total Part IX_B (add lines 58, 64, 66, 71, 72, 73, 74, 75, 76, 77a, b, c and 78)		<u>\$0</u>

Part IX_C – Conventional Mortgage Loan Financing

81.	Estimated construction time (in months)	<u>n/a</u>	
82.	Dollar amount of construction loan		<u>\$0</u>

83.	Construction interest rate	<u>n/a</u> %	
84.	Estimated construction loan interest cost (in dollars)		<u>\$0</u>
85.	Term of long term financing (in years)	<u>n/a</u>	
86.	Interest rate on long term loan	<u>n/a</u> %	
87.	Anticipated mortgage discount (in dollars)		<u>\$0</u>
88.	Feasibility study		<u>\$0</u>
89.	Finder's fee		<u>\$0</u>
90.	Legal fees		<u>\$0</u>
91.	Insurance		<u>\$0</u>
92.	Other fees (list each separately)		
	_____		<u>\$0</u>
93.	_____		<u>\$0</u>
94.	Total permanent mortgage loan interest expense (in dollars)		<u>\$0</u>
95.	Sub-total Part IX_C (add lines 84 & 88 thru 93)		<u>\$0</u>

Financial Data Summary Sheet

96.	Sub-total Part I	Direct Construction Cost (line 7)	<u>\$1,337,000</u>
97.	Sub-total Part II	Equipment not included in construction contract (line 9)	<u>\$2,722,382</u>
98.	Sub-total Part III	Site Acquisition Costs (line 15)	<u>\$0</u>
99.	Sub-total Part IV	Site Preparation Cost (line 23)	<u>\$37,600</u>
100.	Sub-total Part V	Off-Site Costs (line 28)	<u>\$0</u>
101.	Sub-total Part VI	Architectural and Engineering fees (line 33)	<u>\$447,221</u>

102.	Sub-total Part VII	Other Consultant fees (line 35)	<u>\$0</u>
103.	Sub-total Part VIII	Taxes During Construction (line 38)	<u>\$0</u>
104.	Sub-total Part IX-A	HUD-232 Financing (line 53)	<u>\$0</u>
105.	Sub-total Part IX-B	Industrial Development Authority Revenue & General Revenue Bond Financing (line 80)	<u>\$0</u>
106.	Sub-total Part IX-C	Conventional Loan Financing (line 95)	<u>\$0</u>
107.	TOTAL CAPITAL COST (lines 96 thru 106)		<u>\$4,544,203</u>
108.	Percent of total capital costs to be financed <u>0</u> %		
109.	Dollar amount of long term mortgage (line 107 x 108)		<u>\$0</u>
110.	Total Interest Cost on Long Term Financing		<u>\$0</u>
	a.	HUD-232 Financing (line 53)	<u>\$0</u>
	b.	Industrial Development Authority Revenue & General Revenue Bond Financing (line 79)	<u>\$0</u>
	c.	Conventional loan Financing (line 94)	<u>\$0</u>
111.	Anticipated Bond discount		
	a.	HUD-232 Financing (line 53)	<u>\$0</u>
	b.	Industrial Development Authority Revenue & General Revenue Bond Financing (line 70)	<u>\$0</u>
	c.	Conventional Loan Financing (line 87)	<u>\$0</u>
112.	TOTAL CAPITAL AND FINANCING COST (ADD LINES 107, 110a, b or c AND 111a, b or c)		<u>\$4,544,203</u>
D.	1.	Estimated costs for new construction (excluding site acquisition costs)	<u>\$0</u>
	2.	Estimated costs of modernization and renovation (excluding site acquisition costs)	<u>\$1,821,821*</u>

*** Excludes equipment costs.**

E.	Anticipated Sources of Funds for Proposed Project	<u>Amount</u>
1.	Public Campaign	<u>\$0</u>
2.	Bond Issue (Specify Type) _____	<u>\$0</u>
3.	Commercial Loans	<u>\$0</u>
4.	Government Loans (Specify Type) _____	<u>\$0</u>
5.	Grants (Specify Type) _____	<u>\$0</u>
6.	Bequests	<u>\$0</u>
7.	Private Foundations	<u>\$0</u>
8.	Endowment Income	<u>\$0</u>
9.	Accumulated Reserves	<u>\$4,544,203</u>
10.	Other (Identify) _____	<u>\$0</u>

- F. Describe in detail the proposed method of financing the proposed project, including the various alternatives considered. Attach any documents which indicate the financial feasibility of the project.

The project will be funded through accumulated reserves of the Inova Health System.

- G. Describe the impact the proposed capital expenditure will have on the cost of providing care in the facility. Specify total debt service cost and estimated debt service cost per patient day for the first two (2) years of operation. (Total debt service cost is defined as total interest to be paid during the life of the loan (s). Estimate debt service cost per patient day by dividing estimated total patient days for year one into amount of debt service for that year. Repeat for year two.) Please attach an amortization schedule showing how the proposed debt will be repaid.

The project will be funded through accumulated reserves, and, as such, there are no debt service cost associated with the project. Inova does not expect the capital costs associated with the project to impact the cost of care at ILH.

- H. Attach a copy of the following information of documents.

1. The existing and/or proposed room rate schedule, by type of accommodation.

This project will not impact the ILH room rate schedule. See Attachment U.

2. The audited annual financial statements for the past two (2) years of the existing facility or if a new facility without operating experience, the financial state of the owner (s). Audited financial statements are required, if available.

Please see Attachments V.1 and V.2 for the most recent audited financial statements for Inova Health System.

3. Copy of the proposed facility's estimated income, expense and capital budget for the first two years of operation after the proposed project is completed.

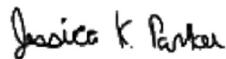
Please see Attachment W.

SECTION VI**ASSURANCES**

I hereby assure and certify that:

- a. The work on the proposed project will be initiated within the period of time set forth in the Certificate of Public Need; and
- b. completion of the proposed project will be pursued with reasonable diligence; and
- c. the proposed project will be constructed, operated and maintained in full compliance with all applicable local, State and Federal laws, rules, regulations and ordinances.

I hereby certify that the information included in this application and all attachments are correct to the best of my knowledge and belief and that it is my intent to carry out the proposed project as described.



Signature of Authorizing Officer

Inova Health System

Address – Line 1

Jessica Parker

Type/Print Name of Authorizing Officer

8095 Innovation Park Drive

Address – Line 2

Senior Director, Strategy & Planning

Title of Authorizing Officer

Fairfax, VA 22031

City/State/Zip

March 27, 2026

Date

703-517-9320

Telephone Number

Copies of this request should be sent to :

- A. **Virginia Department of Health
Division of Certificate of Public Need
9960 Mayland Drive – Suite 401
Henrico, Virginia 23233**
- B. **The Regional Health Planning Agency if one is currently designated by the Board of Health to serve the area where the project would be located.**