



Virginia Department of Health
Division of Certificate of Public Need
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Email: copn@vdh.virginia.gov

October 23, 2024

Re: COPN Request No. VA-8778

Dear Commissioner Shelton:

We welcome the opportunity to comment on VA-8778, a proposed outpatient surgical hospital with two operating rooms. Dominion Plastic Surgery, a reconstructive surgery practice in Falls Church, Virginia, holds a COPN license for a two operating room outpatient surgical hospital in Fairfax County. **DPS's license is for restricted uses as opposed to a general-purpose surgical center.** We write today to express our concern about the proposed project under request VA-8778.

First, we are concerned that this project, under the auspices of the large hospital system VHC Health, may take away patients from smaller outpatient centers, such as ours. Indeed, our facility is located off of the Capital Beltway, I-495, and the proposed facility is located on an exit not far from ours.

The construction of a new facility close to our facility, and other existing facilities, could harm the viability of existing facilities. It is notable the proposed facility is less than five miles from INOVA Mount Vernon Hospital, and just over one mile from INOVA Alexandria Hospital, not to mention other out-patient facilities. **The proposed facility seems poised to compete as a traditional surgical facility against its natural competitor, INOVA, rather than expand access to any sort of specific services.**

Second, the cost of the facility seems astronomical. Indeed, our project cost one-tenth of the cost of the proposed facility. Undoubtedly, the proposed facility will have to recoup the cost of \$9,070,895 in its fees to insurers and patients. Dovetailing with the first issue, that this proposed facility is likely an attempt to compete with INOVA rather than adding additional

specific services to the community, the proposed project may not be in harmony with the SMFP and COPN policies and interests.

Third, The DPS facility, which is just starting to ramp up, could potentially be deprived of significant patient volume from this proposed project, placing the viability of the DPS facility at risk.

Fourth, services at existing facilities, such as this, would likely be less expensive than the services at the proposed facility.

DPS is highly concerned that the proposed project would lead to higher prices to consumers and would not serve the needs of the community as a general surgical center.

Thank you for your consideration.

cc:

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