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June 23, 2022

The Honorable Morgan McDonald MD, FACP, FAAP
Interim State Health Commissioner
Tennessee Department of Health
710 James Robertson Parkway
Nashville, TN 37243

Re: Request for Physician Waiver (Gynecologic Oncologist in Sullivan County, Tennessee)

Dear Commissioner McDonald:

Ballad Health ("Ballad") has identified an immediate need for an additional Gynecologic Oncologist in Sullivan County, Tennessee. In order to meet the community need, Ballad must request a waiver under Section 5.05(e) of the Second Amended and Restated Terms of Certification.

Due to the demographics and payer mix dynamics of our region, without investment by Ballad Health, many needed specialties in the rural and non-urban region served by Ballad would not be available. Such is the case with the availability of Gynecologic Oncology (GYN Oncology) services across the service area. Ballad Health Medical Associates (BHMA) GYN Oncology provides inpatient, outpatient, and surgical services in Kingsport, Tennessee. Currently, BHMA employs one GYN Oncologist, Dr. Paul Kramer, and two advanced practice providers (APPs) to provide GYN Oncology care at Holston Valley Medical Center (HVMC). There are no other GYN Oncologists in the Ballad service area.

As the sole GYN Oncologist in Sullivan County and the entire Ballad service area, Dr. Kramer is the only physician providing on-site services as well as call coverage. The APPs assist with seeing patients and provide call coverage one weekend each per month to allow Dr. Kramer some relief. Hiring another fellowship trained GYN Oncologist would allow us to provide improved staffing and coverage for emergent and urgent needs of patients and referring physicians. The addition of a second GYN Oncologist would improve access to care, reduce wait times, and also would allow for addition of this service availability at a second location, most likely at Bristol Regional Medical Center ("BRMC"). It is notable that current wait times for non-emergent patients may be as long as three weeks, which Ballad believes necessitates the addition. The provision of infusion services at BRMC makes this location a logical place for expansion closer to where many women served by Ballad in both Tennessee and Virginia reside.

As is the case with many specialties that have very distinct subspecialties, the needs assessments do not break out every subspecialty from the general service. For instance, GYN Oncology is not broken out from general hematology/oncology, although the needs assessment does show that there is a need for additional hematology/oncology providers in the HVMC service area beginning in 2023. The demand in 2023 is anticipated to be 15 FTEs, while supply is anticipated to be 12.9 FTEs, leaving a deficit of 2.1 FTEs. Additionally, for the BRMC service area, the needs assessment shows a current deficit of 1.5 FTEs and an anticipated deficit of 3.9 FTEs in 2023. Finally, preliminary data from the updated needs

assessment that is currently in process, shows the GYN Oncology need for the entire Ballard service area is 1.8 FTEs.

Ballad is seeking to add an additional full time equivalent ("FTE") Gynecologic Oncologist to Sullivan County. Currently, BHMA employs 100% of the GYN Oncologists in the entire Ballard service area. This additional FTE will not impact the percent of employed physicians. It will, however, allow for additional coverage at HVMC and provide more timely service to the community and allow for the expansion of surgical services to a second location.

Due to these factors, Ballad is respectfully requesting a waiver under Section 5.05(e) of the Second Amended and Restated Terms of Certification to add an additional 1.0 FTE GYN Oncologist to Sullivan County, Tennessee to improve access, reduce wait times and so that adequate GYN Oncology coverage is available.

We appreciate your consideration of this request. Please let us know if you need any additional information.

Sincerely,



Alan Levine
Chairman and Chief Executive Officer

cc: The Honorable Colin M. Greene, MD, MPH, State Health Commissioner
Virginia Department of Health

Janet M. Kleinfelter
Tennessee Deputy Attorney General

Allyson Tysinger
Virginia Senior Assistant Attorney General

Jim Mathis, COPA Director
Tennessee Department of Health

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