



NC DEPARTMENT OF HEALTH AND HUMAN SERVICES

JOSH STEIN • Governor
KODY H. KINSLEY • Secretary
MARK PAYNE • Director, Division of Health Service Regulation

VIA EMAIL ONLY
CORRECTED

January 7, 2025

Kelly Ivey
kivey@pda-inc.net

No Review

Record #: 4684
Date of Request: December 20, 2024
Facility Name: Gastroenterology Associates
FID #: 061239
Business Name: Gastroenterology Associates, PA
Business #: 817
Project Description: Change in ownership related Project ID# E-8075-08
County: Catawba

Dear Ms. Ivey:

The Healthcare Planning and Certificate of Need Section, Division of Health Service Regulation (Agency) received your correspondence regarding the project described above. Based on the representation in your request and the CON law in effect on the date of this response to your request, the project as described is not governed by, and therefore, does not currently require a certificate of need. If the CON law is subsequently amended such that the above referenced proposal would require a certificate of need, this determination does not authorize you to proceed to develop the above referenced proposal when the new law becomes effective.

This determination is binding only for the facts represented in your correspondence. If changes are made in the project or in the facts provided in the correspondence referenced above, a new determination as to whether a certificate of need is required would need to be made by this office. As a reminder, it is unlawful to offer or develop a new institutional health service without first obtaining a certificate of need. The Department reserves the right to impose sanctions, including civil penalties and the revocation of a license, upon any entity that offers or develops a new institutional health service without first obtaining a certificate of need.

Please do not hesitate to contact this office if you have any questions.

Sincerely,

Ena Lightbourne

Ena Lightbourne, Project Analyst

Micheala Mitchell

Micheala Mitchell, Chief

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • DIVISION OF HEALTH SERVICE REGULATION
HEALTHCARE PLANNING AND CERTIFICATE OF NEED SECTION

LOCATION: 809 Ruggles Drive, Edgerton Building, Raleigh, NC 27603
MAILING ADDRESS: 809 Ruggles Drive, 2704 Mail Service Center, Raleigh, NC 27699-2704
https://info.ncdhhs.gov/dhsr/ • TEL: 919-855-3873

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

STATE OF NORTH CAROLINA

*Department of Health and Human Services
Division of Health Service Regulation*

CERTIFICATE OF NEED

for

Project ID #: E-11347-17

FID #: 061239

**ISSUED TO: Gastroenterology Associates, PA
Gastrocorp, LLC
415 North Center Street, Suite 300
Hickory, NC 28601**

Pursuant to N.C. Gen. Stat. §131E-175, the North Carolina Department of Health and Human Services hereby authorizes the person or persons named above (the "certificate holder") to develop the certificate of need project identified above. The certificate holder shall develop the project in a manner consistent with the representations in the project application and with the conditions contained herein and shall make good faith efforts to meet the timetable contained herein, as documented by the periodic progress reports required by 10A NCAC 14C .0209. The certificate holder shall not exceed the maximum capital expenditure amount specified herein during the development of this project, except as provided by N.C. Gen. Stat. §131E-176(16)e. The certificate holder shall not transfer or assign this certificate to any other person except as provided in N.C. Gen. Stat. §131E-189(c). This certificate is valid only for the scope, physical location, and person(s) described herein. The Department may withdraw this certificate pursuant to N.C. Gen. Stat. §131E-189 for any of the reasons provided in that law.

SCOPE: Add no more than two GI endoscopy rooms to an existing facility for a total of no more than five GI endoscopy rooms/ Catawba County

CONDITIONS: See Reverse Side

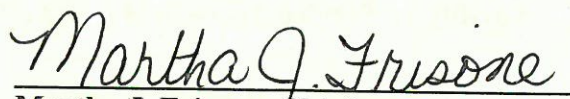
**PHYSICAL LOCATION: Gastroenterology Associates
415 North Center Street, Suite 300
Hickory, NC 28601**

MAXIMUM CAPITAL EXPENDITURE: \$1,593,734

TIMETABLE: See Reverse Side

FIRST PROGRESS REPORT DUE: January 1, 2018

This certificate is effective as of the 29th day of August, 2017



Martha J. Frisone, Chief

CONDITIONS:

1. Gastroenterology Associates, P.A. and Gastrocorp, LLC shall materially comply with all representations made in the certificate of need application and supplemental information received July 12, 2017 and July 18, 2017. In those instances where representations conflict, Gastroenterology Associates, P.A. and Gastrocorp, LLC shall materially comply with the last made representation.
2. Gastroenterology Associates, P.A. and Gastrocorp, LLC shall develop no more than two additional licensed gastrointestinal endoscopy procedure rooms and shall be licensed for a total of no more than five gastrointestinal endoscopy procedure rooms at Gastroenterology Associates following project completion.
3. Gastroenterology Associates, P.A. and Gastrocorp, LLC shall not acquire, as part of this project, any equipment that is not included in the project's proposed capital expenditure in Section VIII of the application and that would otherwise require a certificate of need.
4. For the first two years of operation following completion of the project, Gastroenterology Associates, P.A. and Gastrocorp, LLC shall not increase actual private pay charges more than 5% of the projected private pay charges provided in Section X of the application without first obtaining a determination from the Healthcare Planning and Certificate of Need Section that the proposed increase is in material compliance with the representations in the certificate of need application.
5. Gastroenterology Associates, P.A. and Gastrocorp, LLC shall acknowledge acceptance of and agree to comply with all conditions stated herein to the Healthcare Planning and Certificate of Need Section in writing prior to issuance of the certificate of need.

A letter acknowledging acceptance of and agreeing to comply with all conditions stated in the conditional approval letter was received by the Agency on August 9, 2017.

TIMETABLE:

1. Financing Obtained	December 28, 2017
2. Drawings Completed	March 28, 2018
3. Construction/Renovation Contract(s) Executed	August 7, 2018
4. 25% of Construction/Renovation Completed (25% of the cost is in place)	October 5, 2018
5. 50% of Construction/Renovation Completed	November 5, 2018
6. 75% of Construction/Renovation Completed	December 5, 2018
7. Construction/Renovation Completed	December 23, 2018
8. Equipment Ordered	September 6, 2018
9. Equipment Operational	December 5, 2018
10. Licensure Obtained	January 1, 2019
11. Services Offered	January 1, 2019
12. Facility or Service Accredited (AAAHC Accreditation)	July 5, 2018

STATE OF NORTH CAROLINA

*Department of Health and Human Services
Division of Health Service Regulation*

CERTIFICATE OF NEED

for

**Project Identification Number # E-8075-08
FID#061239**

**ISSUED TO: Gastroenterology Associates, P.A. and Gastrocorp, LLC
415 North Center Street, Suite 300
Hickory, NC 28601**

Pursuant to N.C. Gen. Stat. § 131E-175, et. seq., the North Carolina Department of Health and Human Services hereby authorizes the person or persons named above (the "certificate holder") to develop the certificate of need project identified above. The certificate holder shall develop the project in a manner consistent with the representations in the project application and with the conditions contained herein and shall make good faith efforts to meet the timetable contained herein. The certificate holder shall not exceed the maximum capital expenditure amount specified herein during the development of this project, except as provided by N.C. Gen. Stat. § 131E-176(16)e. The certificate holder shall not transfer or assign this certificate to any other person except as provided in N.C. Gen. Stat. § 131E-189(c). This certificate is valid only for the scope, physical location, and person(s) described herein. The Department may withdraw this certificate pursuant to N.C. Gen. Stat. § 131E-189 for any of the reasons provided in that law.

SCOPE: Add one GI endoscopy room to an existing licensed facility with two existing GI endoscopy rooms for a total of three gastrointestinal endoscopy procedure rooms upon completion of the project/ Catawba County

CONDITIONS: See Reverse Side


**PHYSICAL LOCATION: Gastroenterology Associates, P.A. and Gastrocorp, LLC
415 North Center Street, Suite 300
Hickory, NC 28601**

MAXIMUM CAPITAL EXPENDITURE: \$361,370

TIMETABLE: See Reverse Side

FIRST PROGRESS REPORT DUE: December 1, 2008

This certificate is effective as of the 26th day of July, 2008



**Chief, Certificate of Need Section
Division of Health Service Regulation**

CONDITIONS:

1. Gastroenterology Associates, PA (Lessee) and Gastrocorp, LLC (Lessor) shall materially comply with all representations made in its certificate of need application.
2. Prior to issuance of the certificate of need, Gastroenterology Associates, PA (Lessee) and Gastrocorp, LLC (Lessor) shall provide to the Certificate of Need Section a copy of an executed agreement to transfer and accept referrals of GI endoscopy patients from a hospital where physicians utilizing the facility have practice privileges.
3. Prior to issuance of the certificate of need, Gastroenterology Associates, PA (Lessee) and Gastrocorp, LLC (Lessor) shall provide to the Certificate of Need Section a copy of an executed transfer agreement with a hospital in case of an emergency.
4. Gastroenterology Associates, PA (Lessee) and Gastrocorp, LLC (Lessor) shall develop no more than one additional gastrointestinal endoscopy room for a total of three licensed gastrointestinal endoscopy rooms, as part of this project.
5. The facility fee charged per procedure by Gastroenterology Associates, PA shall be no more than \$810 in operating years one, two and three.
6. Gastroenterology Associates, PA shall prohibit the exclusion of services to any patient on the basis of age, race, religion, disability or the patient's ability to pay.
7. Gastroenterology Associates, PA (Lessee) and Gastrocorp, LLC (Lessor) shall not acquire, as part of this project, any equipment that is not included in the proposed capital expenditure in Section VIII of the application or that would otherwise require a certificate of need.
8. Gastroenterology Associates, PA (Lessee) and Gastrocorp, LLC (Lessor) shall acknowledge acceptance of and agree to comply with all conditions stated herein to the Certificate of Need Section in writing prior to issuance of the certificate of need.

TIMETABLE:

Licensure of facility -----October 31, 2008
Certification of facility ----- November 15, 2008

Board Certified Specialists in Gastrointestinal and Liver Disease
December 5, 2024

Micheala Mitchell, Chief
Ena Lightbourne, Analyst
Healthcare Planning and Certificate of Need Section
Division of Health Service Regulation
NC Department of Health Service Regulation
2704 Mail Service Center
Raleigh, NC 27699
Micheala.Mitchell@dhhs.nc.gov
ena.lightbourne@dhhs.nc.gov

RE: Material Compliance Request, Gastroenterology Associates, PA and GastroCorp, LLC
Project IDs: E-8075-08 & E-11247-17
Facility: Gastroenterology Associates of Hickory
County: Catawba
FID No.: 061239

Dear Ms. Mitchell and Ms. Lightbourne,

On behalf of Gastroenterology Associates, PA and GastroCorp, LLC, I am writing to request a material compliance determination for two Certificates of Need, E-8075-08 and E-11247-17. Gastroenterology Associates and GastroCorp would like to request a material compliance determination for two separate actions:

- Complete a Transfer of Good Cause in accordance with GS 131E-189(c) for both CON Projects: E-8075-08 and E-11247-17, removing GastroCorp, LLC, and leaving Gastroenterology Associates, PA as a sole owner of both CONs; and,
- Complete a Change of Address in accordance with GS 131E-189(g) for CON Project ID: E-11247-17.

Reason for Request

On August 29, 2017, the Healthcare Planning and Certificate of Need Section ("Agency") issued a Certificate of Need ("CON") to Gastroenterology Associates, PA and GastroCorp, LLC. The CON (Project ID E-11247-17) provides for the addition of two new GI endoscopy procedure rooms to Gastroenterology Associates of Hickory, an existing licensed GI endoscopy ambulatory surgery center in Hickory, Catawba County. At project end, the Applicants proposed to have no more than five GI endoscopy procedure rooms.

As per regulatory requirements, the Applicants agreed to all conditions of approval which included, "...materially comply[in] with all representations made in the certificate of need application and supplemental information..."

Since the date of CON award, the Applicants have worked to develop the two new GI endoscopy procedure rooms in the existing GI endoscopy center as represented in the original CON. This included moving the GI endoscopy physician office clinic from the third floor to the first floor to make room for

the procedure room expansion of the licensed surgery center. At project end, Gastroenterology Associates and GastroCorp expected to have a five-GI endoscopy-procedure-room ASC on the third floor of a building at 415 North Center Street in Hickory, NC.

The design team completed architectural plans for the expansion earlier this year and then submitted them to the DHSR Construction Section for review. As of August 9, 2024, the Construction Section informed the Applicants' design team that to meet new Life Safety requirements, the building owner would have to commit to fire rating the horizontal floor / ceiling assembly and protect all support columns from the third floor to the building foundation. This is unachievable. For reference, see highlighted Comment 19 in the letter from Architect David LyJordan of DHSR Construction Section in [Attachment A](#).

The Applicants do not lease, own, or occupy all other parts of the building. These renovations would require disruptive construction in areas leased by unrelated business. Moreover, the added expense would cause the CON project to exceed the approved capital costs.

As a result, GAH has identified a new location at 2415 Century Place SE in Hickory, NC in which it can develop the approved project for two GI endoscopy procedure rooms (E-11247-17) at a much more reasonable cost.

Gastroenterology Associates also plans to submit a CON application at the next available date, February 17, 2025 to relocate the three existing licensed GI endoscopy rooms (E-8075-08) to the same new address, 2415 Century Place SE. Gastroenterology Associates will continue to operate the three existing GI endoscopy rooms at the old location until it receives CON approval for the relocation.

Transfer of Good Cause

Gastroenterology Associates, PA and GastroCorp, LLC together own the CONs for both the existing and approved GI endoscopy rooms. As part of this request, the Applicants would like to transfer ownership of both CONs to Gastroenterology Associates, PA making them the sole owner.

GS 131E-189(c), Withdrawal of a certificate of need posits that the Department "[t]ransfers resulting from ... other good cause... shall not be result in withdrawal if the Department receives prior written notice of the transfer and finds good cause." The Applicants submit this letter as prior written notice and believe that this request will show good cause for the proposed transfer.

As an original Applicant, and operator of the proposed services, Gastroenterology Associates can provide the services of all five rooms "consistent with the representations made in the application and any applicable conditions the Department placed on the certificate of need." Transferring ownership to Gastroenterology Associates alone will not change how it provides services to the patients of the service area.

GastroCorp's involvement as an Applicant was to provide financial support for the renovation portion of the project. Gastroenterology Associates can fund the entire project on its own, including the cost of all support services required for an ASC. Please see the letter from Kelly Farr, Senior Vice President of First Citizen's Bank in [Attachment B](#).

The new location is a physician office building currently under development. The third-party developer has reached out to GastroCorp to become an investor in the property. By removing itself from the CON, GastroCorp can invest in the property, and set the terms of the medical office building lease for Gastroenterology Associates in the new space. This arrangement also ensures that Gastroenterology Associates is only responsible for the costs associated with making the shell space uniquely meet the requirements for an ambulatory surgery center with five GI endoscopy procedure rooms.

Change of Address

The new location is far superior to the existing location. It will accommodate all five GI endoscopy rooms, as well as all the necessary support spaces on the first floor of a newly renovated building. It will have a separate entrance and convenient parking. The new building will meet all the current FGI 2022 Guidelines and have the added advantage of a layout that supports the five-procedure room space in the most efficient way possible.

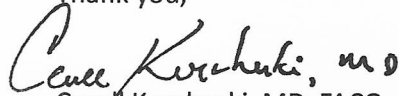
The new location is less than five miles from the existing GI endoscopy center. It is also convenient to I-40, Hwy 70, and other major travel routes in Catawba County. Gastroenterology Associates will continue to provide the same services to all patients represented in its original CON. See maps in **Attachment C**.

Conclusion

We ask that you grant a material compliance for both Transfer of Good Cause of both Project IDs and a Change of Address for Project ID E-11247-17 so that Gastroenterology Associates may move forward with the added rooms and continue to provide quality GI endoscopy services to the patients of Catawba County and nearby communities.

If you have any questions or need additional information, please do not hesitate to reach out to our Chief Executive Officer, Stacey Coffey at scoffey@gastro-assoc.com.

Thank you,



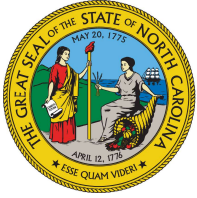
Carol Koscheski, MD, FACP

President

Gastroenterology Associates, PA

Attachments:

- A. *DHSR Construction Section Correspondence*
- B. *Source of Funding Letter*
- C. *Gastroenterology Associates, PA Proposed New Location, Maps*



NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**

ROY COOPER • Governor

KODY H. KINSLEY • Secretary

MARK PAYNE • Director, Division of Health Service Regulation

June 24, 2024

Stacey Coffey, CEO (via email only)
Gastroenterology Associates PA
415 N Center Street Suite 300
Hickory, NC 28601

Re: Project No. AS-398-DLJ/TKM
FID No. 061239
CON No. E-011347-17
Gastroenterology Associates PA
Interior Alterations 3rd Floor
Hickory (Catawba)

Dear Ms. Coffey:

This letter is to acknowledge receipt of the current construction document submission, dated January 31, 2024 (received February 6, 2024 – additional fees paid April 23, 2024). The architectural portions of the submission for the referenced project above have been reviewed for conformance with licensure rules for Ambulatory Surgery Facilities (10A NCAC Chapter 13 Subchapter C). The architectural portions of the drawings are not approved until we receive satisfactory written responses to the following comments:

1. The previous submission for this project was received June 3, 2019. We have since adopted the *FGI Guidelines for Design and Construction of Outpatient Facilities*. This project will be re-reviewed per the 2022 edition of these guidelines.
2. Provide a complete Functional Program with your next submission. [FGI OF Section 1.2-2]
3. Verify how accommodations for written and/or electronic documentation will be provided at the new Endoscopy Procedure Rooms. If a built-in feature is to be provided, it must allow for direct observation of the patient when in use. [FGI OF Sections 2.9-3.2; 2.1-3.2.3.3]
4. Clarify which type of acoustic ceiling tile will be installed at the new Endoscopy Procedure Rooms and the Endoscope Processing Room. These ceilings must meet the requirements for a semi-restricted area. [FGI OF Section 2.1-7.2.3.3(2)]
5. Clarify how the patients' personal effects will be secured during endoscopy procedures. [FGI OF Sections 2.1-3.2.3.10; 2.9-3.10.3.2]

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • DIVISION OF HEALTH SERVICE REGULATION

CONSTRUCTION SECTION

LOCATION: 1800 Umstead Drive, Williams Building, Raleigh, NC 27603
MAILING ADDRESS: 2705 Mail Service Center, Raleigh, NC 27699-2705
info.ncdhhs.gov/dhsr/ • TEL: 919-855-3893 • FAX: 919-733-6592

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

6. Show the locations of patient gurneys at all Prep and Recovery cubicles. Verify that minimum 3-foot clearances will be provided between the sides of all patient gurneys and adjacent walls, and a minimum 2-foot clearance will be provided between the foot of all patient gurneys and the cubicle privacy curtain. [FGI OF Section 2.1-3.7.2.2(2)(b)]
7. At Medication Safety Zone 417, verify that the refrigerator will be lockable and that a sharps container will be provided, if sharps are used. [FGI OF Sections 2.9-3.8.8; 2.1-3.8.8.2(1)(a)(iii); (v)]
8. Clarify the location of the required general and equipment supply storage room. This room must contain a minimum of 25 square feet of storage space per procedure room. [FGI OF Section 2.9-3.8.13.2]
9. If a wheelchair owned by the facility will be made available for patient use, indicate on the floor plan where storage for at least one wheelchair will be provided, directly accessible to the entrance. [FGI OF Sections 2.9-3.8.13.3; 2.1-3.8.13.3; 2.1-6.2.6.1]
10. If the facility will provide services that required patients to transfer to a facility wheelchair, exam table or stretcher, a designated area for parking at least one patient-owned wheelchair in a non-public area, located out of any required egress width or other required clearance, must be provided. [2.9-3.8.13.3; 2.1-3.8.13.3; 2.1-6.2.6.2]
11. Clarify the locations of required fluid waste disposal facilities for the Procedure Rooms as well as the Prep/Recovery area. [FGI OF Section 2.9-3.8.15]
12. Verify the location of the required patient toilet room, located readily accessible to the Procedure Rooms and the Prep/Recovery area. New patient toilet rooms must have entry doors that either swing outward or are equipped with emergency rescue hardware. [FGI OF Sections 2.9-3.10.2.1; 2.1-7.2.2.3(5)(a)(i); (ii)]
13. At Endoscopy Processing 414, an instrument air outlet or space for portable compressed air must be provided where required by the equipment used. [FGI OF Sections 2.9-4.3.2.2(5); 2.9-4.3.3.2(3)]
14. Clarify the location of compliant clean endoscope storage. [FGI OF Section 2.9-4.3.3.4]
15. As there is no 6-foot wide corridor between the new and existing portions of the facility, verify that the patients at the new Prep and Recovery cubicles will only be served by the new Endoscopy Procedure Rooms and that the existing pre-/post- patient care stations will only be served by the existing procedure rooms. [FGI OF Sections 2.9-7.2.2.1; 2.1-7.2.2.1(2)]
16. Soiled Holding 432 must have a monolithic floor and wall base assembly with an integral coved wall base carried a minimum of 6 inches up the wall and sealed tightly thereto. [FGI OF Section 2.1-7.2.3.1(6)(a)(ix)]
17. For Plumbing Fixture LA, the discharge point of the faucet must be no less than 10 inches above the bottom of the handwashing sink basin. [FGI OF Section 2.1-8.4.3.2(5)]
18. For Plumbing Fixture SK, the handwashing sink basin must have a minimum nominal size of 1 square foot, with a minimum dimension of 9 inches in width or length. [FGI OF Section 2.1-8.4.3.2(2)]

19. As this facility is an Ambulatory Health Care Occupancy, a horizontal 1-hour occupancy separation must be provided between the facility and the Business occupancy below. The horizontal separation, as well as the supporting construction must both have a minimum 1-hour fire resistance. [NFPA 101 Table 6.1.14.4.1; NCSBC Section 508.4.4.1; 711.2.3]

A review of the plumbing, mechanical, and electrical drawings will follow.

It is our understanding that this project was designed under the 2018 edition of the North Carolina State Building Codes as a interior alteration of a fully-sprinklered building of Type II-B construction under Group B Occupancy and Section 422 Ambulatory Care Facilities. The project has also been reviewed for Medicare/Medicaid certification under NFPA 101 Chapter 38 New Business Occupancies and Chapter 20 New Ambulatory Health Care Occupancies within a building of NFPA Type II (000) construction. You may access licensure rules at our DHSR website:

<http://info.ncdhhs.gov/dhsr/testrules.htm>.

Please use our Project No. AS-398-DLJ/TKM and FID No. 061239 on all correspondence related to this project and attach a Construction Plan Submittal Form with any project resubmittals. If you have any questions or if we can be of any further assistance, please contact our office at the telephone number or e-mail address listed below.

Sincerely,



David LyJordan
Architect
DHSR Construction Section
david.lyjordan@dhhs.nc.gov
(919) 855-3928

cc: Holland & Hamrick Architects, P.A. – Greg Melton (via e-mail only)
Catawba County Inspections Department – Laura Rooks (via e-mail only)



November 22nd, 2024

Ms. Micheala Mitchell, Chief
NC Division of Health Service Regulation
Healthcare Planning and Certificate of Need Section
2704 Mail Service Center
Raleigh, NC 27699-2704

RE: Available Funding for Gastroenterology Associates, PA's Certificate of Need Application for a Two GI endoscopy Procedure Rooms

Dear Ms. Mitchell,

Over the past several years, First Citizens Bank has had the privilege of working closely with Gastroenterology Associates, PA. We are familiar with their financial operations. We understand that Gastroenterology Associates has a certificate of need to develop two new GI endoscopy procedure rooms in a medical office building in Hickory, NC. We further understand that Gastroenterology Associates will incur fixed and working capital costs associated with the development of this project.

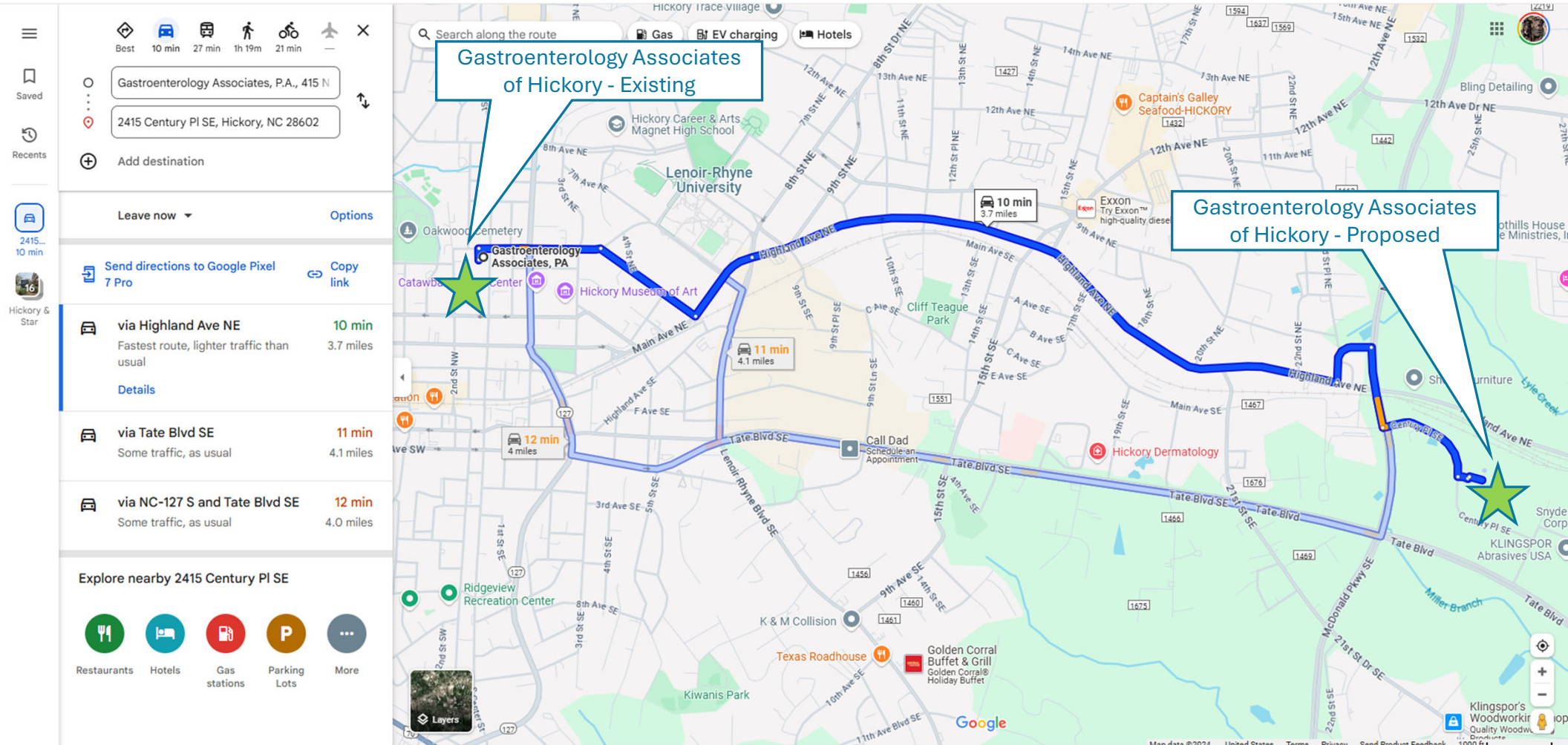
We welcome the opportunity to assist Gastroenterology Associates with this endeavor by financing up to \$1.6 million of fixed and working capital. We expect terms to follow the prevailing bank rates at the time of the loan. In today's market, the following terms would be a 6.25% annual interest rate compounded daily with a 10 term for the fixed; and 6.25% annual interest compounded daily on the working capital draw.

Thank you for your time and attention. We look forward to working with Gastroenterology Associates, PA on this project.

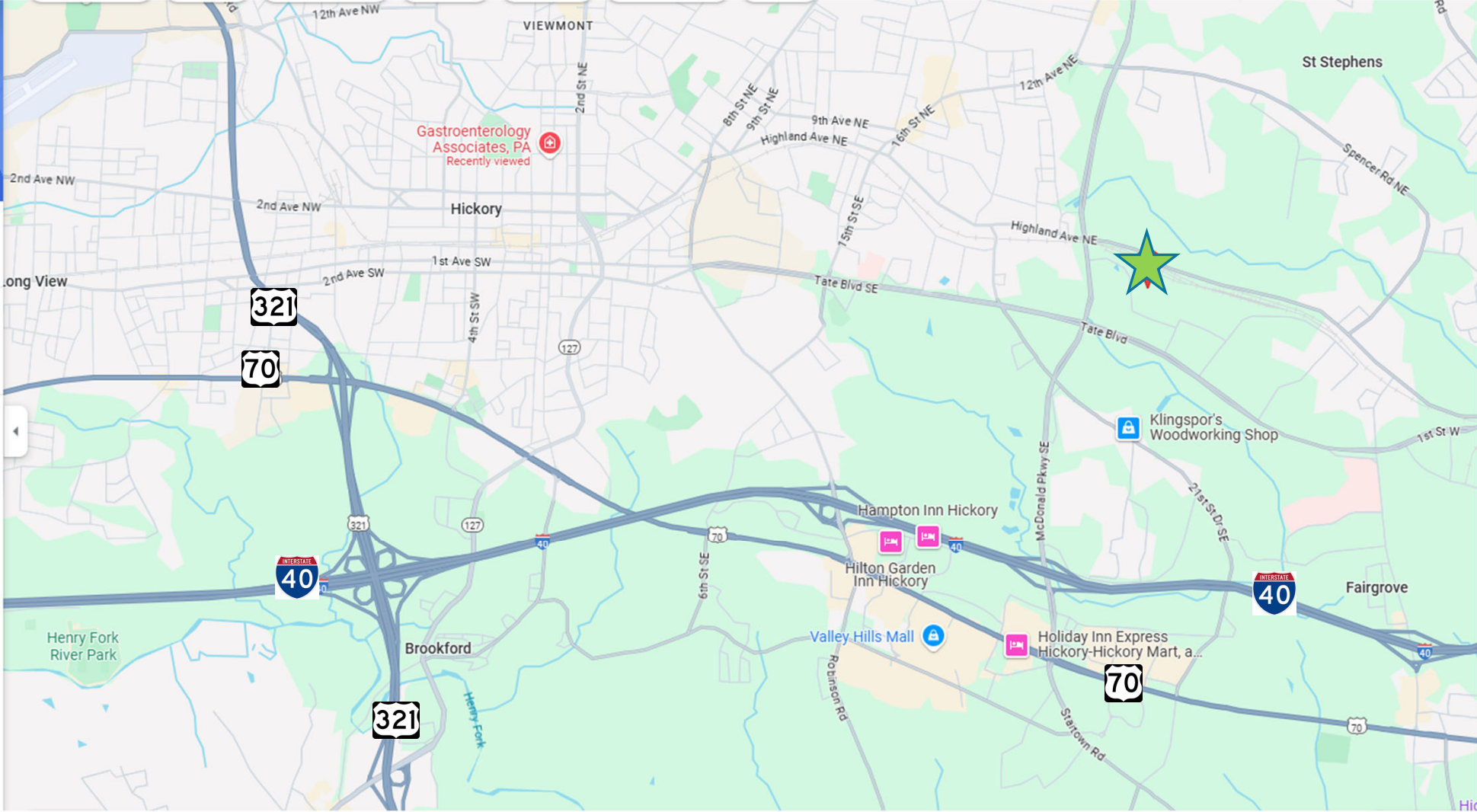
Sincerely,

Kelly Farr
Senior Vice President
First Citizens Bank

Gastroenterology Associates, PA: Existing Location in Relation to Proposed New Location



Gastroenterology Associates, PA: Proposed New Location in Relation to Major Thoroughfares



Gastroenterology Associates, PA: Proposed New Location, Site Plan



Gastroenterology Associates, PA: Proposed New Location, Building View



From: [Kelly Ivey](#)
To: [Lightbourne, Ena](#); [Stancil, Tiffany C](#)
Cc: [Stacey Coffey](#)
Subject: [External] Material Compliance: E-8075-08 & E-11247-17
Date: Friday, December 20, 2024 12:31:35 PM
Attachments: [Gastroenterology Assoc Hickory Material Compliance 12.20.24.pdf](#)

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Ena,

Attached is a material compliance request for a change of address and change of ownership on behalf of our client, Gastroenterology Associates, PA.

If you have any questions or need additional information, please do not hesitate to reach out. We look forward to your quick response.

Thanks,
Kelly

Kelly Ivey
kivey@pda-inc.net
919.754.0303
www.pdaconsultants.com

PDA



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