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VIA E-MAIL to Logan.Grant@tn.gov

Logan Grant
Executive Director
Health Facilities Commission
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Re: St. Thomas Midtown Hospital – Mt. Juliet FSED – CN2605-014

Dear Mr. Grant:

Pursuant to Tenn. Code Ann. § 68-11-1609(g)(2), TriStar Summit Medical Center (“TriStar Summit”) hereby submits this letter in opposition to CON Application No. CN2605-014, in which St. Thomas Midtown Hospital (“STMH”) seeks to establish a new freestanding emergency department (“FSED”) at a location that is directly across the interstate from TriStar Summit’s Mt. Juliet FSED in Wilson County. The STMH FSED CON Application fails to meet the requirements of the Certificate of Need (“CON”) statute, Tenn. Code Ann. § 68-11-1609(b) or the State Health Plan CON Standards and Criteria for establishing a FSED (“Criteria”).

TriStar Summit is a 234-bed acute care hospital located in Hermitage, Davidson County, Tennessee, right on the border between Davidson County and Wilson County, and has been serving Wilson County patients for over 20 years. TriStar Summit has operated a FSED in Mt. Juliet located at 100 Summit Blvd. just off I-40 Exit 229 since 2019. The proposed STMH FSED will be located 500 yards from the TriStar Mt. Juliet FSED and eight-tenths of a mile (0.8) by road.

1. Mt. Juliet Does Not Need Another FSED Located 500 Yards from the TriStar Mt. Juliet FSED.

STMH claims geographic isolation as a basis for need even though its proposed FSED is located 500 yards from the TriStar Mt. Juliet FSED. The proposed FSED is at the same interstate exit as the TriStar Mt. Juliet FSED (Exit 229) and less than eight-tenths of a mile by road from the TriStar Mt. Juliet FSED. Another FSED is simply not needed this close to an existing FSED.

Having a duplicate FSED at the same Interstate Exit (229) is confusing and unnecessary. STMH's CON application does not even attempt to assert that there is some special need for a FSED at this location. It relies on the alleged benefit of introducing a new FSED provider to the Mt. Juliet community and the hoped-for medical area to be developed at Legacy Pointe, along with a Costco, a Whataburger, a Texas Roadhouse, a Chipotle Mexican Grill, and a Wash N Roll car wash.

2. Treatment Times at the TriStar Mt. Juliet FSED show that a Duplicate FSED is not Needed at I-40 Exit 229.

The lack of need is clearly supported by the HFC's own Criteria. The HFC's Criteria call for using median time from ED arrival to departure to evaluate need ("treatment time"). TriStar Summit's publicly reported treatment times include both its main emergency room at TriStar Summit and the TriStar Mt. Juliet FSED. As shown below, the TriStar Summit facilities' combined wait times are very low:

Measure: OP-18B Median Time from ED Arrival to ED Departure					
Service Area Emergency Department	Volume	Timeframe	ED Time/Score	TN Average	National Average
TriStar Summit	Very High	7/1/2024-6/30/2025	150	196	199
VWCH	Medium	7/1/2024-6/30/2025	165	167	165
Applicant					
Ascension St Thomas	Very High	7/1/2024-6/30/2025	195	196	199

May 13, 2026 CMS release

TriStar Summit's internal treatment time data for the TriStar Mt. Juliet FSED highlights the lack of need for another FSED at the location of the STMH proposal. During the same time period of the CMS data reported above, the TriStar Mt. Juliet treatment time was **114 minutes**. This is **one (1) hour and 24 minutes lower than the statewide average**. The low treatment times at the TriStar Mt. Juliet FSED demonstrate that there is capacity at the existing FSED. As noted below, two additional FSEDs have already been approved for Wilson County, one in which Ascension St. Thomas is a joint-venture participant with HighPoint Health that is merely 5.4 miles from the proposed STMH FSED. These new facilities as well as the existing TriStar Mt. Juliet FSED show that another FSED is not needed at the same Interstate Exit.

3. STMH's Parent System is a Co-Venturer with HighPoint Health, which holds a CON for another FSED 5.4 Miles from the Proposed FSED.

On September 24, 2025, the HFC approved a CON for a FSED for a HighPoint Health/Ascension Health joint venture in Lebanon, CN2506-020. After that CON was approved, HighPoint/Ascension asked to relocate the facility to 3940 Highway 109 North, Lebanon, TN 37087, which was approved by the HFC in January 2026, RE2512-007A.

STMH's CON application for its Mt. Juliet FSED offers no explanation for why the already approved CON for the HighPoint/Ascension FSED 5.4 miles away will not meet any unmet emergency needs in the area. The only justification offered in the STMH CON application is that this will be the first Ascension FSED in Wilson County. While that is true, Ascension is a JV partner with HighPoint for the FSED approved in September 2025.

In addition, two weeks ago, the HFC approved a CON for the TriStar Lebanon FSED, which will be located two interstate exits east of the proposed STMH Mt. Juliet FSED, I-40 Exit 236. If the STMH CON is approved, there will be four (4) approved FSEDs between the eastside of Mt. Juliet and the westside of Lebanon, the existing TriStar Mt. Juliet FSED, the approved HighPoint/Ascension FSED, the approved TriStar Lebanon FSED, and the proposed STMH Mt. Juliet FSED. This proliferation of FSEDs in the same area shows that the STMH FSED is a duplication of existing and approved services and is not needed.

4. STMH Makes No Showing of Need for a FSED at the Proposed Location and is Redundant to the Existing TriStar Mt. Juliet FSED.

Notably, as TriStar Summit pointed out in its CON Application for its Lebanon FSED, over one-third (33%) of TriStar Summit's emergency patients live closer to its approved TriStar Lebanon FSED site on South Hartman Drive than to its TriStar Mt. Juliet FSED. This means that TriStar Summit expects the number of patients seeking care at its TriStar Mt. Juliet FSED should be reduced upon the establishment of its Lebanon FSED.

The increase in capacity at the TriStar Mt. Juliet FSED that will come from the approved TriStar Lebanon FSED when combined with its already exceptionally low wait-times show that there is no need for another FSED at the same location. Ascension St. Thomas fails to demonstrate that existing and approved emergency departments in Wilson Mt. Juliet are not adequate to meet the needs of the community.

5. No Improvement in Access to Emergency Care Will Come from this CON.

As you know, emergency departments must treat all who present themselves for care. Therefore, having two FSEDs at the same Interstate exit will not afford any improvement in access to care for any particular segment of the population.

Of course, STMH relies upon its connection with BlueCross BlueShield Network S ("BCBS Network S") as a benefit. As noted, whether a patient is BCBS Network S or not, they will be cared for by whatever emergency department the patient goes to and under the No Surprises Act, the cost of care to the patient will be the same whether they are in-network or not, even if they are ultimately admitted to the hospital as an in-patient.

Per STMH's CON application, the BCBS Network S members in Wilson County are not excluded from care at the existing emergency facilities there. Further, the Applicant makes no showing of where those members live (i.e. whether or not they live closer to Ascension's JV FSED for which it has approval to establish in Lebanon).

6. Two FSEDs at the Same Interstate Exit Will Cause Confusion For Consumers

Not only is the STMH proposed FSED a duplication of existing services, but it will be a disservice to the community to have two FSEDs at the exact same interstate exit, Exit 229. STMH could have chosen a location at multiple other points, including the Mt. Juliet exit west of Exit 229, which is three miles west of the proposed location, Exit 226. Arguably, consumers who live closer to the center of Mt. Juliet at or near Exit 226 could be advantaged by having a FSED introduced there. But instead, STMH proposes to put a FSED at the exact same Interstate exit as the TriStar Mt. Juliet FSED, not providing any additional or different services.

Conclusion

In sum, STMH fails to show Need or Consumer Advantage in its CON application for a new FSED in Mt. Juliet to be located 500 yards from the existing TriStar Mt. Juliet FSED at the same interstate exit. Accordingly, TriStar Summit respectfully requests that the Health Facilities Commission deny STMH's CON Application CN2605-014.

Respectfully submitted,



M. Clark Spoden

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