



August 5, 2024

Henry Ford Hospital
Radiation Safety Office
2799 West Grand Blvd.
Detroit, Michigan 48202-2689
(734) 657-4133 Mobile (Preferred)
(313) 916-8456 Fax

Materials Licensing Branch
U.S. Nuclear Regulatory Commission, Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352
(800) 522-3025
(630) 515-1078 FAX

Dear Sir or Madam:

We are requesting a license amendment to the Premier Cardiovascular Specialists license (21-32740-01; Docket: 030-38009). Henry Ford Health is assuming ownership (transfer of control) of this practice and also establishing a new Radiation Safety Officer (Alan M. Jackson, MS, CHP) and adding an Associate Radiation Safety Officer (Mayur Vaya). Otherwise, no other material licensing changes are being requested. All existing license commitments and records will be maintained. The final ownership change will not occur until the NRC approves this request. This license request will follow the guidance provided by NUREG-1556 Volume 15; Revision 1. This document contains licensing guidance in Chapter 9 "*Contents of an Application*" but also separately has an Appendix E "*Information Needed for Transfer of Control Application*". I will incorporate the information needed for the application following the formatting example in Chapter 9 as follows:

NRC License Amendment Details

1. Application Type (NUREG 1556 Volume 15 Rev 1 §9.1)

Amendment of License Number: 21-32740-01; Docket: 030-38009

2. Applicant's Name and Mailing Address (§9.2)

The control of the NRC license for Premier Cardiovascular Specialists (the Transferor) will be transferred to Henry Ford Health (the Transferee). Henry Ford Health will

- Employ the staff, excluding the "providers" (i.e. physicians and advanced practice providers - Nurse Practitioners and Physician Assistants).
- Purchase the assets including imaging and nuclear measurement devices.
- Manage the locations.
- Contract with Premier Cardiovascular Specialists to provide clinical services. Samer Salka M.D. will remain as the Authorized User.

The organization name will be changing as follows:

Henry Ford Physician Partners
Heart and Vascular
Henry Ford Health

The address for correspondence will be changing to:

Alan M. Jackson, MS, CHP
Radiation Safety Office K-3
Henry Ford Hospital
2799 W. Grand Boulevard
Detroit, MI 48202-2689

3. Addresses Where Licensed Material Will Be Used/Possessed (§9.3)

There are no changes in the locations of use for this amendment.

4. Name of the person to be contacted about this application (§9.4)

Alan M. Jackson, MS, CHP
Radiation Safety Officer
Henry Ford Hospital
2799 W. Grand Boulevard
Detroit, MI 48202-2689

Fax: (313) 916-8456

Cell: (734) 657-4133 (Preferred)

Email: Alanjster@gmail.com (Best for encrypted documents)

E-mail: AlanJ@rad.hfh.edu (Encrypted documents are blocked by the firewall)

5. Radioactive Material (§9.5)

There are no changes in the radioactive materials used.

5.1 Financial Assurance and Recordkeeping for Decommissioning (§9.5.1)

Pursuant to 10 CFR 30.35, 10 CFR 40.36, or 10 CFR 70.25, we shall transfer records important to decommissioning to the new licensee before licensed activities are transferred or assigned. Furthermore, pursuant to 10 CFR 30.51(f), 10 CFR 40.61(f), or 10 CFR 70.51(a)(3), prior to license termination, we shall forward the records required by 10 CFR 30.35(g), 10 CFR 40.36(f), or 10 CFR 70.25(g) to the appropriate NRC regional office. A letter regarding these commitments is found later in this document.

After review of 10 CFR §30.35 and other guidance we believe that this license is exempt from providing financial assurance for decommissioning because of the types of radioactive materials used. The unsealed isotopes used are all: short-lived; high purity (negligible impurities); and of low radiotoxicities. Further, only small activities of the unsealed isotopes are used. Similarly, the sealed sources are not a significant decommissioning issue. Disposal avenues for the sealed sources are readily available and the disposal costs of these would be a trivial expense. The sealed sources have showed no leakage or any loss of integrity. The use of the sealed sources is limited to those used for dose calibrator testing, gamma camera uniformity, and survey meter check sources. Finally, the financial resources of Henry Ford Health are substantial and meeting the criteria for Appendix E to Part 30 would be easily accomplished if needed.

6. Purposes for Which Licensed Material will be Used (§9.6)

There are no changes proposed with the purposes for which the licensed material will be used.

7. Individuals responsible for the Radiation Safety Program (§9.7)

Alan M. Jackson, MS, CHP will become the new Radiation Safety Officer upon approval of this license amendment. Mayur Vaya B.S., CNMT, NMTCB (RS), RT(N) will serve as the Associate Radiation Safety Officer. Mr. Jackson and Mr. Vaya presently serve in these same capacities in other Henry Ford Health licenses. To show that the qualifications for both of these individuals have already been reviewed, as being adequate, an example listing from the Henry Ford Hospital license (21-04109-16; Docket: 030-02043) is shown below:

11. A. The Radiation Safety Officer (RSO) for this license is Alan M. Jackson, CHP.

B. The Associate Radiation Safety Officer (ARSO) for this license is Mayur V. Vaya, B.S., CNMT, NMTCB (RS), RT(N). for 10 CFR 35.100, 10 CFR 35.200, 10 CFR 35.300, 10 CFR 35.400, 10 CFR 35.600 (limited to HDR remote afterloader), and 10 CFR 35.1000 (limited to Y-90 SIR-Spheres and TheraSpheres microspheres and Best Vascular, Inc. Beta-Cath).

The delegation of authority letter for Mr. Jackson and Mr. Vaya is shown below:




Date: July 24, 2024

Delegation of Radiation Safety Authority

Alan M. Jackson, MS, CHP is hereby appointed as the Radiation Safety Officer for Henry Ford Physician Partners at Heart and Vascular part of Henry Ford Health and is he responsible for ensuring the safe use of radiation at these locations. The Radiation Safety Officer is responsible for managing the radiation safety program which includes: identifying radiation safety problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; and ensuring compliance with regulations. The Radiation Safety Officer is hereby delegated the authority necessary to meet those responsibilities including the authority to immediately stop any operations involving the use of ionizing radiation in which either health and safety may be compromised or which may result in non-compliance with regulatory or other legal requirements. The Radiation Safety Officer has the authority to directly contact upper administration directly, including me, when staff does not cooperate or properly address radiation safety Issues. The Radiation Safety Officer is empowered to contact regulatory agencies without any pre-approval.

In addition, Mayur Vaya, BS is authorized as the Associate Radiation Safety Officer at this same location under the supervision of Mr. Jackson.


Nancy Zehnpfennig
Vice President
Henry Ford Health

Mr. Jackson accepting responsibility as the Radiation Safety Officer is shown below:



August 2, 2024

Henry Ford Hospital
Radiation Safety Office
2799 West Grand Blvd.
Detroit, Michigan 48202-2689
(734) 657-4133 Mobile (Preferred)
(313) 916-8456 Fax

To whom it may concern:

In accordance with 10 CFR 35.24 (b) I agree, upon approval of the associated license amendment by the Nuclear Regulatory Commission, to be the Radiation Safety Officer for the NRC License Number: 21-32740-01 (Docket: 030-38009). This license is currently named Premier Cardiovascular Specialists and upon approval by the NRC will be renamed as Henry Ford Physician Partners (HFPP). HFPP will be part of the Henry Ford Health Heart and Vascular business.

Sincerely,

A handwritten signature in black ink that reads "Alan M. Jackson". The signature is fluid and cursive.

Alan M. Jackson, MS, CHP
alanj@rad.hfh.edu

Mr. Vaya accepting responsibility as Associate Radiation Safety Officer is shown below:



August 2, 2024

Henry Ford Hospital
Radiation Safety Office
2799 West Grand Blvd.
Detroit, Michigan 48202-2689
(734) 657-4133 Mobile (Preferred)
(313) 916-8456 Fax

To whom it may concern:

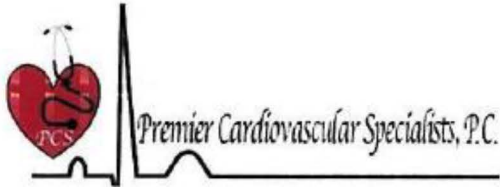
In accordance with 10 CFR 35.24 (b) I agree to be the Radiation Safety Officer for NRC License Number: 21-32740-01; Docket: 030-38009). The scope of my authority and responsibilities are codified in the Nuclear Regulatory Commission license and regulations. I understand that I will be working as ARSO under the supervision of Alan M. Jackson, MS, CHP.

Sincerely,

A handwritten signature in black ink that reads "Mayur Vaya" followed by a stylized flourish.

Mayur Vaya B.S., CNMT, NMTCB (RS), RT(N)
mayurv@rad.hfh.edu

The letter requesting this transfer of control by the current Radiation Safety Officer (and the Authorized User) is shown below:



20200 Outer Dr
Dearborn, MI 48124
Phone (313) 624-8417
Fax (313) 357-7074

39000 W 7 Mile Rd
STE 3800
Livonia, MI 48152
Phone (734) 414-1376
Fax (734) 738-6643

19850 Gibraltar Rd
Gibraltar, MI 48173
Phone (734) 301-3125
Fax (734) 301-3325

Samer Salka, MD, FACC
Kristine Kaiser, MD
Majid Qazi, DO
Gregory Hazergian, DO, FACC
Michael Ashbrook, MD
Omar Obeidat, MD, FACC
Diana DeAngelis, DO

Derek Poley, NP-C
Kristie Greear, PA-C
Allison Sabo, MS, PA-C
Nisreen El-Saghir, PA-C
Katie Zhong, PA-C

To whom it may concern:

Premier Cardiovascular Specialists, PC (PCS) is seeking to transfer control of our Nuclear Regulatory Commission activities. The control of the NRC license for Premier Cardiovascular Specialists (the Transferor) will be transferred to Henry Ford Health (the Transferee). Thus, we are requesting an amendment of NRC License Number: 21-32740-01 (Docket: 030-38009). As the Transferor, PCS is selling and giving up control of the license and associated equipment to Henry Ford Health (HFH). We understand that the final ownership change of the license will not occur until the NRC approves the license amendment request. I am the Chief Executive Officer of PCS, the RSO, and an Authorized User. Consequently, I can speak for PCS. I will be stepping down as the RSO. I will continue as an Authorized User. Otherwise, no other material licensing changes are being requested. All existing license commitments and records will be maintained.

There will be no material changes in the location, facilities, equipment, radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program. The status of the facilities, equipment, and radiation safety program remains fully in compliance with NRC regulations and license conditions. There is no known radioactive contamination. All the calibrations, leak tests, area surveys, wipe tests, training, quality control, and related records remain fully in compliance. All records concerning the safe and effective decommissioning of the facility will be transferred to the transferee (HFH) or to NRC, as appropriate. These records include documentation of surveys of ambient radiation levels and fixed and/or removable contamination, including methods and sensitivity. PCS agrees to transfer control of the licensed radioactive materials to HFH. HFH has been made aware of any open inspection items and its responsibility for possible resulting enforcement actions (there are currently none).

Samer Salka, M.D.

7.2 Remove from the License

Please remove Samer Salka, M.D. as the Radiation Safety Officer. Dr. Salka will remain as an Authorized User.

8. Training Program (§9.8)

No changes in the training program are requested.

9. Facilities and Equipment (§9.9)

No changes in facilities and equipment are requested.

The current status of the program is good. There are no open NRC inspection items. The licensee's facilities and equipment are being properly maintained. There are no issues with the radiation safety program. There are no known radioactive contamination areas. No decontamination is presently needed prior to transfer of control. Work at the site continues unabated so contamination could occur but since the isotope used is short-lived Tc-99m, significant contamination events are highly unlikely and would simply be handled as a matter of course. Required surveillances remain up to date and fully in compliance including calibrations, leak tests, area surveys, wipe tests, training, quality control, and related records are being maintained.

10 Radiation Safety Program (§9.10)

No changes to the radiation safety program are requested other than what is already specified in section 7 (above).

11 Radioactive Waste Management (§9.11)

No changes are requested.

12 Fees

No fees are required for this request.

13 Certification

Please see the NRC form 313 (below):

NRC FORM 313 U.S. NUCLEAR REGULATORY COMMISSION (07-31-2023) 10 CFR 30, 32, 33, 34, 35, 36, 37, 39, and 40		APPROVED BY OMB: NO. 3150-0120 EXPIRES: 07/31/2026 <small>Estimated burden per response to comply with this mandatory collection request: 4.5 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 AICM), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by email to InfoCollects.Resource@nrc.gov, and the OMB Reviewer at: OMB Office of Information and Regulatory Affairs, (3150-0120), Attn: Desk Officer for the Nuclear Regulatory Commission, 725 17th Street NW, Washington, DC 20503; email: oir_submission@omb.eop.gov. The NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the document requesting or requiring the collection displays a currently valid OMB control number.</small>																	
 APPLICATION FOR MATERIALS LICENSE																			
INSTRUCTIONS: SEE THE CURRENT VOLUMES OF THE NUREG-1556 TECHNICAL REPORT SERIES ("CONSOLIDATED GUIDANCE ABOUT MATERIALS LICENSES") FOR DETAILED INSTRUCTIONS FOR COMPLETING THIS FORM: http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/st1556/. SEND ONE COPY OF THE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.																			
APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH: MATERIALS SAFETY AND TRIBAL LIAISON BRANCH DIVISION OF MATERIALS SAFETY, SECURITY, STATE AND TRIBAL PROGRAMS OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS U.S. NUCLEAR REGULATORY COMMISSION WASHINGTON, DC 20555-0001		IF YOU ARE LOCATED IN: ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO: MATERIALS LICENSING BRANCH DIVISION OF RADIOLOGICAL SAFETY AND SECURITY U.S. NUCLEAR REGULATORY COMMISSION, REGION III 2443 WARRENVILLE ROAD, SUITE 210 Lisle, IL 60532-4352 R3-DRESSMAIL_Resource@nrc.gov <small>*Note: The preferred method to submit NRC Form 313 is email. Any other document (e.g., financial assurance documents) should be sent via mail.</small>																	
ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS: IF YOU ARE LOCATED IN: ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA,		IF YOU ARE LOCATED IN: ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING,																	
SEND APPLICATIONS TO: LICENSING ASSISTANCE TEAM DIVISION OF RADIOLOGICAL SAFETY AND SECURITY U.S. NUCLEAR REGULATORY COMMISSION, REGION I 475 ALLENDALE ROAD, SUITE 102 KING OF PRUSSIA, PA 19406-1415 R1DRSSMail.Resource@nrc.gov <small>*Note: The preferred method to submit NRC Form 313 is email. Any other document (e.g., financial assurance documents) should be sent via mail.</small>		SEND APPLICATIONS TO: MATERIALS LICENSING BRANCH DIVISION OF RADIOLOGICAL SAFETY AND SECURITY U.S. NUCLEAR REGULATORY COMMISSION, REGION IV 1600 E. LAMAR BOULEVARD ARLINGTON, TX 76011-4511 R4licensing@nrc.gov <small>*Note: The preferred method to submit NRC Form 313 is email. Any other document (e.g., financial assurance documents) should be sent via mail.</small>																	
PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.																			
1. THIS IS AN APPLICATION FOR (Check appropriate item) <input type="checkbox"/> A. NEW LICENSE <input checked="" type="checkbox"/> B. AMENDMENT TO LICENSE NUMBER <u>21-32740-01</u> <input type="checkbox"/> C. RENEWAL OF LICENSE NUMBER _____		2. NAME AND MAILING ADDRESS OF APPLICANT (include zip code) Henry Ford Health Radiation Safety Office K-3 2799 West Grand Blvd Detroit, MI 48202																	
3. LIST ADDRESS AND/OR TEMPORARY JOB SITE (TJS) ADDRESS, WHERE LICENSED MATERIALS WILL BE USED OR POSSESSED 20200 W Outer Dr. Dearborn, MI 48124 Additional work locations as previously described		4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION Alan M. Jackson, MS, CHP <table border="1"> <tr> <td>BUSINESS TELEPHONE NUMBER 734-657-4133</td> <td>BUSINESS CELLULAR TELEPHONE NUMBER 734-657-4133</td> </tr> <tr> <td colspan="2">BUSINESS E-MAIL ADDRESS alanj@rad.hfh.edu and alanjster@gmail.com (encrypted files)</td> </tr> </table>		BUSINESS TELEPHONE NUMBER 734-657-4133	BUSINESS CELLULAR TELEPHONE NUMBER 734-657-4133	BUSINESS E-MAIL ADDRESS alanj@rad.hfh.edu and alanjster@gmail.com (encrypted files)													
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SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.																			
5. RADIOACTIVE MATERIAL a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.		6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.																	
8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.		7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE.																	
10. RADIATION SAFETY PROGRAM.		9. FACILITIES AND EQUIPMENT.																	
12. LICENSE FEES (Fees required only for new applications, with few exceptions*) <small>(See 10 CFR 170 and Section 170.31)</small> <small>*Amendments/Renewals that increase the scope of the existing license to a new or higher fee category will require a fee.</small>		<table border="1"> <tr> <td>FEE CATEGORY</td> <td>NA</td> <td>AMOUNT ENCLOSED \$</td> <td>0.00</td> </tr> </table>		FEE CATEGORY	NA	AMOUNT ENCLOSED \$	0.00												
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PER THE DEBT COLLECTION IMPROVEMENT ACT OF 1996 (PUBLIC LAW 104-134), YOU ARE REQUIRED TO PROVIDE YOUR TAXPAYER IDENTIFICATION NUMBER. PROVIDE THIS INFORMATION BY COMPLETING NRC FORM 531: https://www.nrc.gov/reading-rm/doc-collections/forms/nrc531info.html. FAX THE COMPLETED NRC FORM 531 TO (301) 415-6725.																			
13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT. THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 37, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF. WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.																			
CERTIFYING OFFICER - TYPED/PRINTED NAME AND TITLE Lisa Brown System VP Radiology HFH		SIGNATURE 	DATE 8/5/24																
FOR NRC USE ONLY																			
<table border="1"> <tr> <th>TYPE OF FEE</th> <th>FEE LOG</th> <th>FEE CATEGORY</th> <th>AMOUNT RECEIVED</th> <th>CHECK NUMBER</th> <th>COMMENTS</th> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </table>	TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS							<table border="1"> <tr> <th>APPROVED BY</th> <th>DATE</th> </tr> <tr> <td> </td> <td> </td> </tr> </table>	APPROVED BY	DATE				
TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS														
APPROVED BY	DATE																		

NRC FORM 313 (07-31-2023)

Closing

Please contact me with any questions.

Sincerely,

A handwritten signature in black ink that reads "Alan M. Jackson". The signature is written in a cursive style with a prominent initial "A" and a long, sweeping underline.

Alan M. Jackson
Radiation Safety Officer

Filename: assume ownership of premier cardiovascular specialists.docx

Martha Pavon

From: Tammy Tomczak
Sent: Monday, August 5, 2024 12:10 PM
To: Martha Pavon
Cc: Sandy Pavon
Subject: FW: Ownership Change of Premier Cardiovascular Specialists
Attachments: Assume Ownership of Premier Cardiovascular Specialists.pdf

Good afternoon, Martha 😊

Can you please add the attached to ADAMS?

Thank you!!
Tammy

From: Jackson, Alan (RSO) <alanj@rad.hfh.edu>
Sent: Monday, August 5, 2024 11:59 AM
To: R3-DRSSMail Resource <R3-DRSSMail.Resource@nrc.gov>
Cc: Vaya, Mayur <mayurv@rad.hfh.edu>
Subject: [External_Sender] Ownership Change of Premier Cardiovascular Specialists

A license amendment request is attached.

Thanks!

-Alan

Alan M. Jackson, MS, CRP

Radiation Safety Officer

Henry Ford Hospital

2799 West Grand Boulevard

Detroit, MI 48202

(313) 916-2739 Voice

(313) 916-8456 Fax

(734) 657-4133 Cell

E-mail: AlanJ@rad.hfh.edu

Pronouns: He, him, his (gender neutral pronouns can also be used)

HENRY FORD HEALTH

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Note to Patients: There are a number of risks you should consider before using e-mail to communicate with us. See our Privacy & Security page on www.henryford.com for more detailed information as well as information concerning MyChart, our new patient portal. If you do not believe that our policy gives you the privacy and security protection you need, do not send e-mail or Internet communications to us.