



February 6, 2019

Madison County Board of Supervisors
P.O. Box 608
Canton, MS 39046

Re: Request for total tax exemption
Methodist Rehabilitation Center
102 S. Perkins St.
Ridgeland, MS 39157

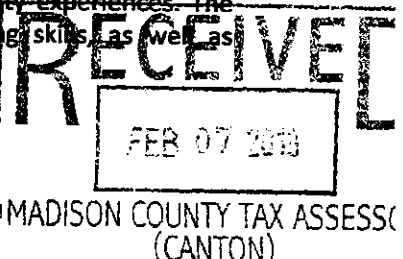
Dear Board of Supervisors:

Please accept this request for total tax exemption for real and personal property belonging to Mississippi Methodist Hospital & Rehabilitation Center, Inc. (d/b/a Methodist Rehabilitation Center) located at 102 S. Perkins St., Ridgeland, MS 39157 [PPIN# 004241, Parcel 010737]. It recently came to our attention that exemptions are not automatic for non-profit hospital operations conducted in Madison County, but that a formal request for tax exemption must be filed with the Madison County Board of Supervisors.

Methodist Rehabilitation Center (also referred to as "Methodist") operates an in-patient comprehensive rehabilitation hospital located in Hinds County, Mississippi that is specifically designed to treat people who have had a stroke, brain injury, spinal cord injury or other debilitating injury or illness. In furtherance of its mission, Methodist also operates outpatient physical therapy locations located in the tri-county area, Orthotics & Prosthetics Offices throughout Mississippi and Louisiana, as well as a Nursing Home for the Severely Disabled located in Rankin County.

In 2012, Methodist purchased 3 acres of land in Ridgeland consisting of several parcels located along Jackson Street, bordered by South Perkins, Hamilton and South Maple Streets for the purposes of constructing a facility to provide outpatient physical therapy for those patients located in Madison County. Overgrown landscaping and several dilapidated structures were removed from the area and replaced with a brand new building surrounded by a well-landscaped area. Methodist's actions in constructing this facility have greatly increased the aesthetic quality of the community and area adjacent to Old Towne Ridgeland. The outpatient center was granted a Certificate of Occupancy on June 8, 2017.

At this Ridgeland location, Methodist provides physical and occupational therapy services in addition to Methodist's Quest program, which is unique to this location. The Methodist Quest program is Mississippi's most comprehensive outpatient program for people with brain or spinal injuries who wish to make a successful return to work, school or home life. Participants learn the skills necessary for independent living through individual and group sessions and "real-life" community experiences. The program focuses on improving organization, communication and problem-solving skills, as well as



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overcoming physical impairments. Quest and other activities provided at the Ridgeland location are part of the hospital operations and are non-profit in nature, thereby qualifying for tax-exemption.

Methodist is exempt from federal taxation pursuant to § 501(c)(3) of the Internal Revenue Code. The property of the hospital is exempt from ad valorem taxation in the State of Mississippi pursuant to §27-31-1 of the Mississippi Code Annotated.

Mississippi Code Ann. §27-31-1 states in pertinent part:

The following shall be exempt from taxation:

(f) All property, real or personal, whether belonging to religious or charitable or benevolent organizations, which is used for hospital purposes, and nurses' homes where a part thereof, and which maintain one or more charity wards that are for charity patients, and where all the income from said hospitals and nurses' homes is used entirely for the purposes thereof and no part of the same for profit.

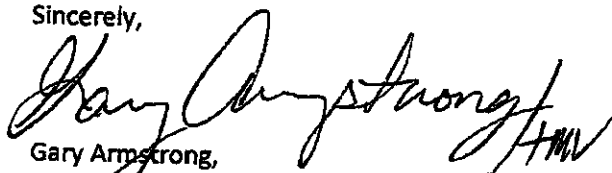
Methodist provides appropriate inpatient and outpatient services for free or at reduced rates to individuals who qualify under its financial assistance policy. Since its opening in June of 2017, Methodist has provided and continues to provide free and/or discounted care to patients admitted with first-time spinal cord or traumatic brain injuries. All income is then used to carry out Methodist's charitable purposes and no part is used for profit or for the direct benefit of any individual. Methodist is governed by an independent, volunteer Board of Trustees.

Methodist was unaware that it was required to submit a formal request for tax exemption to the Board of Supervisors until it received the enclosed statement for 2018 Property Tax (PPIN 004241, Parcel 10737). As explained above, Methodist meets the qualifications for federal and state tax exemption and hereby requests total tax exemption for its real and personal property located at its Ridgeland facility. Methodist respectfully requests that the total tax exemption apply retroactively from the date of occupancy which began on June 8, 2017.

It is my understanding that a representative for Methodist must appear at the Board of Supervisor's meeting to present this request. We will call to be placed on the agenda. If this is not necessary, please let me know. You may contact me at 601-364-3360.

Thank you for your consideration.

Sincerely,


Gary Armstrong,
Executive Vice President & Chief Financial Officer

cc: Madison County Tax Assessor
Madison County Tax Collector