



July 6, 2015

Ms. Eileen Fleck  
Chief, Specialized Services Policy and Planning  
Maryland Health Care Commission  
4160 Patterson Avenue  
Baltimore, MD 21215

Re: June 18, 2015 Draft Amendments to State Health Plan for Cardiac Services

Dear Ms. Fleck:

On behalf of Peninsula Regional Medical Center (PRMC), I am submitting the following comments regarding the June 18, 2015 draft amendments to the State Health Plan (SHP) for cardiac services.

First, we are grateful for the clarification in the types of cases for which a minimum volume standard applies. A broader category of "Cardiac Surgery" is not appropriate when evaluating an open heart surgery (OHS) program. PRMC is supportive of volume driven requirements for OHS programs which correlate to quality.

Second, for hospitals providing cardiac services with all three components (open heart surgery, elective and primary PCI) we believe the proposed regulations need to be streamlined. This will reduce the unnecessary burden and duplicative requirements. In addition, there is no alignment between the internal and external review requirements or clarity of the ongoing performance measures.

Third, we support the acknowledgement of cardiac programs currently under a Corporate Integrity Agreement with the Department of Justice be granted an exception from the external and internal case review requirements [10.24.17.07(C)(4)(h)]. However, this exemption is only noted under .07(C) "Elective PCI Programs" and needs to be included under the .07(D) "Primary PCI Programs" requirements.

PRMC is committed to meeting the quality requirements, but asks for the following to be considered:

- 1) Consolidate and clarify "certificate of ongoing performance" requirements for hospitals providing all three cardiac program components;
- 2) Clarify the external and internal review requirements for physicians and hospitals;
- 3) Publish an annual schedule for submissions for "certificates of ongoing performance";

- 4) Reduce duplication of performance measures already required from those hospitals that participate in a) the MIEMSS Cardiac Interventional Center designation and b) Maryland Cardiac Surgery Quality Initiative.

PRMC is honored to provide comments on the June 18, 2015 Draft Amendments to State Health Plan for Cardiac Services. We look forward to working with the MHCC staff and others to ensure successful adoption of this plan chapter.

Sincerely,



Christopher C. Hall  
Vice President, Strategy & Business Development