CARROLL
HOSPITAL CENTER

October 21, 2013

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

RE: **COMAR 10.24.17**
Informal Public Comment
Specialized Cardiovascular Services:
Cardiac Surgery and Percutaneous Coronary
Intervention Services

Dear Ms. Fleck:

Below are two comments from Carroll Hospital Center for the Commission's consideration in drafting a final recommendation for the State Health Plan for Facilities and Services: Cardiac Surgery and Percutaneous Coronary Intervention Services.

.06B(1): Need. Need is described as "The hospital must demonstrate that its proposed elective PCI program is needed to preserve timely access to emergency PCI services for the population to be served." As drafted this standard suggests that a hospital cannot get a Certificate of Initial Conformance to provide elective PCI unless it can demonstrate that it cannot continue to provide primary PCI services without having elective cases as well. We do not believe that this is an appropriate measure of "need" for an **elective** PCI program. Carroll Hospital Center would ask that the Commission change this standard to what is outlined under "Volume." We feel "Need" should be based on the hospital's ability to achieve 200 or more elective cases by the end of the third year. This is in keeping with the requirement under "primary." We feel a volume benchmark is more appropriate and clear cut than tying this important service to a more ambiguous measure that would be dependent upon subjective review.

.06B(3): Financial Viability: While Carroll Hospital Center realizes this particular measure was likely included for hospitals that will be applying for primary and elective PCI at the same time, we would like to ask the Commission to consider making this an alternative measure under the volume requirement for all hospitals. We are suggesting that "Need" could state 200 cases or achieving financial viability.

We thank the Commission for its consideration and look forward to seeing a final draft.

Sincerely,

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Chief Executive Officer

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