



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

October 18, 2013

Dear Ms. Fleck,

On behalf of Frederick Memorial Hospital, we appreciate the opportunity to comment on the State Health Plan for Facilities and Services: Specialized Cardiovascular Services (Draft) dated October 2, 2013. Overall, FMH is in support of the structure and process by which the Maryland Health Care Commission will oversee cardiac services in the State. However, there are two key points in the Plan which FMH feels should be changed.

First and foremost is the proposed change to our service area. FMH has always been included in the Western Maryland Region for cardiac, as well as other services, and is aligned more closely with the hospitals along the Northern and Western areas of Maryland than with a grouping that includes the far distant Southern Maryland counties and the heavily urban Prince George's and lower Montgomery County areas that are in many aspects suburbs of the District of Columbia. FMH strongly believes that consideration should be given to a hospital's service area in considering its placement. In addition, the Plan discusses the higher and many times unmet need for emergency PCI services in rural areas as compared to immediate access to cardiac services in urban areas of the State. While FMH, like many jurisdictions, is in a state of constant change, it continues to bear more resemblance to the more rural areas of western Maryland than to the heavily urbanized areas of Montgomery and Prince George's County. In addition, supporting our position of remaining in the rural Western Maryland Region is that FMH is the only hospital in a county where the choice of alternative locations for complex emergency services does not exist. We therefore are of the position and strongly recommend that FMH be placed in the Western Region for purposes of Cardiac Services planning.

FMH is in agreement with the majority of the Quality initiatives that are put forth in the Plan. In regards to external review we believe that the qualifications of the external reviewers should be clearly defined and published in the Plan. Previous to this Plan, FMH has and plans again to engage an external reviewer(s) to evaluate and support our appropriateness of procedures. We have committed the financial resources to engaging a reputable firm and physicians to review our cases. We advocate that this be the case with all institutions, thus the need for clear definition surrounding qualifications.

FMH looks forward to continuing to provide high quality cardiac services to the residents of our County and community. We wish to thank the Commission for their efforts which contribute to our ability to do so.

Yours truly,

A handwritten signature in black ink, appearing to read 'Nancy Bruce', is written over a light blue horizontal line.

Nancy Bruce
Director Cardiac and Vascular Services
Frederick Memorial Hospital