

October 18, 2013

Ben Steffen
Executive Director
Maryland Health Care Commission
4160 Patterson Avenue
Baltimore, Maryland 21215

Dear Mr. Steffen,

Thank you for the opportunity to submit comments on the draft State Health Plan for Facilities and Services: Specialized Cardiovascular Services COMAR 10.24.17. Holy Cross Health shares the State of Maryland's desire to ensure the its health plan provides for effective oversight of the quality of interventional cardiology services. All hospitals should be required to have a robust quality oversight program and be able to represent that to the Maryland Health Care Commission. However, we are concerned that clause 10.24.17.07(5)(f) and (f)(iii) requiring disclosure of confidential peer review information to the Commission could have a chilling effect on physicians being open and cooperative in reviewing their own practices and helping the hospital identify root causes of quality/patient safety issues for fear of legal repercussions. Rather, we suggest the section be amended to require hospitals to submit blinded data regarding performance by individual physicians, with number of cases, number of cases reviewed, opportunities and aggregate data with opportunities for improvement identified and any necessary actions, such as improvement in systems, individual education, focused review (FPPE), referral to supervisory. The State would retain existing authority to obtain individual physician/patient level data if needed.

Holy Cross Health concurs with all other sections of the draft state health plan as written.

Sincerely,


Judith Rogers
President, Holy Cross Hospital