

October 21, 2013



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

**Re: Informal Comments Proposed Regulations  
Specialized Cardiovascular Services COMAR 10.24.17**

Dear Ms. Fleck:

Saint Agnes Hospital has reviewed the proposed State Health Plan regulations for Specialized Cardiovascular Services COMAR 10.24.17. Saint Agnes appreciates the work of the Task Force and the Commission to develop these draft regulations as a result of many years of clinical research and purposeful deliberations regarding the policies for the provision of cardiovascular services to the citizens of Maryland.

In general, Saint Agnes supports the policies that are articulated in the proposed draft regulations regarding cost, quality, patient safety and access. Saint Agnes is opposed to the financial viability provision in COMAR 10.24.17.06(B)(3) and would recommend that the proposed waiver from Certificate of Conformance to provide elective PCI be deleted. The proposed regulations already provide a provision for lower primary PCI volume thresholds for programs located in rural locations as well as a provision that the hospital demonstrate elective PCI program is needed to preserve timely access to emergency PCI services. If the Commission elects to retain the financial viability provision, the criteria for the proposed waiver from minimum volume requirements to obtain a Certificate of Conformance should be reworded such that the waiver can only be granted to programs located in rural settings similar to the exception provided in the primary PCI volume requirements.

If you have any questions regarding these comments, please feel free to contact my office (410.368.3161 or [fmeyers1@stgnes.org](mailto:fmeyers1@stgnes.org)).

Sincerely,

A handwritten signature in black ink that reads "F. Joseph Meyers".

F. Joseph Meyers  
Chief Strategy Officer

cc: Marta Harting