



A Member of Adventist HealthCare

June 30, 2014

Paul Parker  
Director, Center for Health Care Facilities Planning & Development  
Maryland Health Care Commission  
4160 Patterson Avenue  
Baltimore, MD 21215-2299

Via Fax and e-mail

**Subject:** *Comments regarding the State Health Plan for Facilities and Services: Specialized Healthcare Services- Cardiac Surgery and Percutaneous Coronary Intervention Services COMAR 10.24.17*

Dear Mr. Parker:

Washington Adventist Hospital appreciates the opportunity to provide comment on the above mentioned draft regulations.

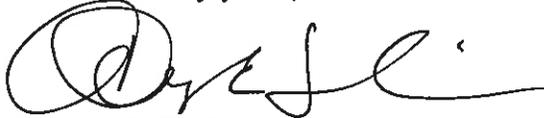
Washington Adventist Hospital supports upholding the highest standards in quality and patient safety for all cardiac services. In this spirit, we respectfully suggest use of the data from the Society of Thoracic Surgeons Adult Cardiac Surgery Database (STS-ACSD) to evaluate cardiac surgery services. The STS reports and the well-established National Quality Forum star rating system are nationally recognized as the standard in reporting patient care quality. The STS-ACSD has been in existence for nearly fifty years and has a long history of providing data that is of the highest quality in statistical analysis. It is renowned as the principal clinical database and risk model nationally and internationally and its reports are recognized by CMS and the National Quality Forum as the national standard in the evaluation of Cardiac Surgery programs. The database consists of several million surgical cases, thus allowing for maximum functionality and accuracy.

Data used to evaluate programs must be functional and accurate in order to provide a fair and balanced assessment, especially in the area of risk adjustment. The STS-ACSD reports provide this type of accurate assessment by using risk prediction methodologies

derived from continually evolving logistic regression models for nine key nationally accepted outcome metrics. In addition, the STS-ACSD reports are able to compare a hospital's risk adjusted data at 95% confidence intervals with national benchmarks from over 1,000 surgery programs nationwide. Using this broad national database as its platform for risk adjustment along with the use of continuously progressing analytic methods will allow the MHCC to have reports which provide the most accurate view attainable in the evaluation of Cardiac Surgery programs in Maryland.

Washington Adventist Hospital is committed to providing the highest quality in our cardiac surgery care and we, along with other programs in Maryland, use these reports to guide our practices, protocols, and continuous quality improvement programs. Use of the STS-ACSD would provide the MHCC with the highest level of analysis available nationwide for cardiac surgery programs. It is for these reasons we urge MHCC to use this nationally accepted report system in its evaluation of Maryland's cardiac surgery programs.

Respectfully yours,

A handwritten signature in black ink, appearing to read 'Amy F. Carrier', written in a cursive style.

Amy F. Carrier  
Vice-President

Cc: Terry Forde, President and CEO, Adventist HealthCare