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April 13, 2015

Certificate of Need Program
Tertiary Service Review
Attn: Kyle Karinen, Office of Legal Services
Washington State Department of Health
P.O. Box 47873
Olympia, WA 98504-7873

Dear Mr. Karinen:

On behalf of the Franciscan Heart Center, I am writing to endorse the removal of elective PCI from the list of Certificate of Need defined tertiary services. Our Heart Center provides cardiology services in locations in Pierce, King, Kitsap, Clallam and Jefferson Counties, and in 2014 (calendar year) we performed more than 1,593 PCI procedures.

I have reviewed the definition of tertiary defined in WAC 246-310-035 and the proposal submitted to the Department demonstrating that elective PCI no longer meets the tertiary service criteria and recommending its removal from the list. The clinical and quality information provided in the proposal accurately cites the current evidence and data, and also reflects my experience as a board-certified interventional cardiologist with more than 14 years of experience. The low risk and increasing outpatient nature of elective PCIs, coupled with the COAP-documented quality of Washington providers (regardless of facility or provider volume), demonstrates that elective PCI no longer meets the definition of tertiary and should be removed from the list.

I appreciate the opportunity to provide public comment, and urge the Department to move forward to update its list of tertiary services and to exclude elective PCI. Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Antonio Secaira".

R. Antonio Secaira, MD
Medical Director, Invasive Cardiology
Email: antoniosecaira@chifranciscan.org