



PeaceHealth
Southwest Medical Center

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OFFICE OF LEGAL SERVICES

March 27, 2015

Kyle Karinen
Office of Legal Services
Tertiary Services Review
Certificate of Need Program
Washington Department of Health
PO Box 47873
Olympia WA 98504-7873

Re: Comments to proposed Revisions to Tertiary Services Definitions as Defined in WAC246-310-020(1)(d)(i)

Dear Mr. Karinen:

On behalf of PeaceHealth, I would like to provide comments to the recommendations received regarding the definition of Tertiary Services (WAC 246-310-020(1)(d)(i)). These recommendations are in response to the Department of Health certificate of need (CON) program's announcement of a Tertiary Services' review in a memorandum distributed in early January, 2015. This announcement requests interested parties to review and propose changes, if any, to the current list of tertiary services. Additionally, the announcement provided a review period for comments on the recommendations received.

PeaceHealth agrees with the recommendation provided to reduce the volume thresholds for percutaneous coronary interventions from current CON minimum volumes. We do not recommend other changes to Tertiary Services at this time.

Thank you in advance for your consideration of our comments. If there are any questions regarding the above, I can be reached at 360-514-6667 or ntieman@peacehealth.org.

Sincerely,

Nancy Tieman
Vice President, Strategy, Innovation and Development
PeaceHealth Washington and Alaska

cc: Nancy Steiger, CEO, Washington/Alaska
Sy Johnson, CEO, Columbia Network
Kirk Raboin, St John CAO