

April 14, 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:

The Yakima Heart Center was the first cardiology group to bring diagnostic cardiac catheterization and interventional cardiology to central Washington. We follow closely every proposed change in this field and have been carefully weighing the Department of Health's process for updating the list of tertiary services and the certificate of need requirements for these services. We are familiar with the Department of Health's methods in making these determinations.

We have reviewed the current application before the DOH to remove elective coronary angioplasty from the list of tertiary services. We agree that elective PCI should be removed from this list as this procedure currently does not meet the criteria developed by the DOH in the past when this list was formulated. Our conclusion is based in large part on the following:

1. Elective PCI is a nearly ubiquitous service that is provided not just by a few providers but by many providers throughout the State.
2. COAP data shows that outcomes are not dependent on volumes or the availability of on-site surgery.
3. It is truly a rare occurrence for elective PCI to require transfer for more complex services.
4. Most elective PCI is handled as an outpatient service which is a significant change from when the DOH first formulated the rules.
5. We also feel it is ironic that emergent PCI which may require more operator skill when managing frequently complex, high risk, unstable patients does not require a certificate of need whereas elective PCI performed on stable and typically less complex patients requires a certificate of need.
6. Published data support the safety of PCI performed in hospitals without on-site surgical backup.



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7. The majority of states currently perform elective PCI without on-site surgical backup.
8. Elective PCI without surgical backup is acknowledged in current ACC and SCAI guidelines.

Thank you for the opportunity to comment. Please contact me with any questions

Sincerely,

A handwritten signature in cursive script, appearing to read "Roger E. Vielbig".

Roger E. Vielbig, M.D., F.A.C.C.