



April 15, 2015

Certificate of Need Program
ATTN: Kyle Karinen, Office of Legal Services (kyle.karinen@doh.wa.gov)
Tertiary Service Review
Washington State Department of Health
P.O. Box 47873
Olympia, WA 98504-7873

Dear Mr. Karinen,

Thank you for the opportunity to comment on the Certificate of Need Program Tertiary Health Services Review process.

The Washington State Hospital Association (WSHA) writes to comment on the process and procedure used to gather comments and feedback on the tertiary health services list. WSHA appreciates the open, transparent and accessible process that the Department of Health's Certificate of Need Program (CN Program) used to notify stakeholders of the review process and solicit meaningful feedback. We are encouraged and hope that future review and rule making processes in the CN Program will benefit from the same transparent, accessible process.

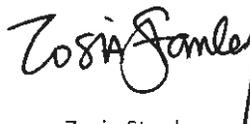
This is the first time WSHA is aware of that the CN Program has engaged in the annual review of tertiary services as required by WAC 246-310-035(3). We look forward to more regular opportunities for stakeholders to engage with the CN Program and provide valuable feedback on both substantive and procedural areas of the Program. WSHA's goal is the development of clear criteria, transparent processes, and standards that are fairly and uniformly enforced.

Please direct any questions to Zosia Stanley at zosias@wsha.org or (206) 216-2511.

Sincerely,



Claudia Sanders
Senior Vice President
Policy Development



Zosia Stanley
Policy Director Access