October 19, 2016

Katherine Hoffman  
Certificate of Need  
P.O. Box 47852  
Olympia, WA 98504-7852

RE: Proposed Revision to WAC 246-310-020

Dear Ms. Hoffman:

This letter contains Overlake Hospital Medical Center’s (“Overlake”) public comments in support of the Department of Health’s (“Department”) proposed revision to WAC 246-310-020. Overlake agrees that existing ambulatory surgical facilities (“ASFs”) should obtain a Certificate of Need (“CN”) when expanding the ASF to include additional operating rooms.

As a community hospital primarily serving the East King County area, Overlake supports the proposed rule for the following reasons:

- Requiring Department approval for the addition of operating rooms is consistent with the policy rationale that operating rooms be added only when the current supply is insufficient to meet the future need.
- Performing a “need” analysis for the addition of operating rooms at an ASF serves the CN law’s purpose to control health care costs by ensuring full utilization of existing facilities.
- The proposed rule creates a more level playing field by preventing existing CN-approved ASFs from increasing their number of operating rooms at will without CN approval.
- Clearly addressing ASF operating room expansion in WAC 246-310-020 will allow the Department to properly exercise its authority regarding this issue.

Overlake appreciates the opportunity to comment on these proposed rules. If you have any questions concerning these comments please contact me at caitlin.hillary@overlakehospital.org or (425) 467-3513.

Sincerely,

[Signature]

Caitlin Hillary Moulding  
Chief Strategy Officer  
Overlake Hospital Medical Center
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