April 21, 2016

Russ Myers, Chief Executive Officer
Yakima Valley Memorial Hospital
2811 Tieton Drive
Yakima WA 98902

Sent via email and regular U.S. Mail

RE: Certificate of Need Percutaneous Coronary Intervention (PCI) Rules Petition

Dear Mr. Myers,

On March 16, 2016, the Department of Health (department) received your rules petition requesting the Certificate of Need elective percutaneous coronary intervention (PCI) rules be amended. The department is responding to your petition as required by Revised Code of Washington (RCW) 34.05.330.

Your petition proposed the following specific rule revisions:

- **WAC 246-310-715(2):** adjust the minimum annual adult PCI volume standards from three hundred to two hundred; adjust the minimum volume standard for physicians performing adult elective PCI procedures at applying hospitals from seventy-five PCI per year to fifty PCI per year.
- **WAC 246-310-720(1):** adjust the minimum annual adult PCI performed in hospitals with elective PCI programs from three hundred PCI per year to two hundred PCI per year by the end of the third year of operation.
- **WAC 246-310-725:** adjust the minimum volume standards for physicians performing adult elective PCI procedures at applying hospitals from seventy-five PCI per year to fifty PCI per year.
- **WAC 246-310-745((10))((d), Step 4:** adjust the volume standard for purposes of calculating net need for additional adult elective PCI procedures from three hundred to two hundred;
- **WAC 246-310-745(10)(d), Step 5(a):** adjust the volume standard for purposes of calculating net need for additional adult elective PCI procedures from three hundred to two hundred.
- **WAC 246-310-745(10)(d), Step 5(a):** adjust the rounded results example to identify the number of needed programs from 575/300 = 1.916 or 1 program to 375/200 = 1.875 or 1 program, consistent with the proposed volume standard of two hundred.
Included with the petition were the following documents:

- Memorandum dated August 18, 2015, from the Certificate of Need Tertiary Services Review Team to Martin Mueller, Assistant Secretary, Health Services Quality Assurance regarding 2015 tertiary services review.

The main reasons cited in your request to change the PCI rules were:

- The current rules’ volume standards no longer reflect published research; and
- The current volume standards are not being met by most hospitals in Washington state performing elective PCI.

The department agrees that updating the PCI rules limited to the specific amendments noted above is important to ensuring access to services for Washington residents and is consistent with current published research. Washington Administrative Code (WAC) 246-310-715—General requirements, WAC 246-310-720—Hospital Volume Standards, WAC 246-310-725—Physician volume standards, and WAC 246-310-745—Need forecasting methodology were adopted in 2008 and have not been amended since that time.

In response to your request, the department is willing to open the PCI rules to consider the specific amendments requested in your petition and listed above.

Please note that your proposed rule revisions identify WAC 246-310-745(10)(d), Step 5 and Step 5(a). The current rule identifies the result of need calculation in WAC 246-310-745(10)(d), Step 5(b). If it is your intention to combine subparts (a) and (b) as proposed Step 5(a), please advise.

If you have any questions about the rulemaking process, please contact me by telephone at (360) 236-2979 or by email at katherine.hoffman@doh.wa.gov.

Sincerely,

Katherine Hoffman, Policy Analyst
Certificate of Need Program
Office of Community Health Systems

cc: Janis Sigman
    Bart Eggen
    Martin Mueller