

The Honorable Douglas J.J. Peters, Chair
Prince George's County Senate Delegation
121 James Office Building
11 Bladen Street
Annapolis, Maryland 21401-1991

The Honorable Jolene Ivey, Chair
Prince George's County House Delegation
207 Lowe House Office Building
6 Bladen Street
Annapolis, Maryland 21401-1991

RE: Draft State Health Plan for Facilities and Services:
Specialized Cardiovascular Services COMAR 10.24.17

Dear Senator Peters and Delegate Ivey:

The Prince George's County government is united in this request for a change in proposed regulations governing Percutaneous Coronary Interventions (PCI) and Cardiac Surgery procedures. As we understand the proposal, it is the intent to give the Maryland Health Care Commission (MHCC) authority to monitor these medical procedures and to allow MHCC to terminate a hospital program that is not in compliance with the proposed regulations.

We have been working with Governor O'Malley's administration, the University of Maryland Medical System (UMMS) and Dimensions Healthcare System since 2011 to complete a plan that will improve the quality of our county's healthcare system and assure access to a broad range of necessary services that should be more conveniently accessible to the nearly 1 million residents of Prince George's County. Funds to implement this plan have been committed by the state and county. We are moving forward with Dimensions Healthcare System and the Prince George's Hospital Center to expeditiously implement this plan that will include a replacement hospital and expanded primary care network. The ability to grow the heart surgery program has been viewed as a critically important component of the total care plan. A substantial number of our residents currently leave the county for this service. The role of heart surgery at the hospital has become limited to supporting the very active trauma program. We believe that the plan for UMMS to grow the cardiac surgery program in our county is critical to the success of our plan and the health status of Prince George's County residents.

Taking into account these issues and upon review and discussion of the proposed regulations, we have a number of concerns with the proposed regulations that must be addressed:

1. Voluntary relinquishment of a hospital's authority to operate a cardiac services program
2. Focused review for surgery volume below 100 cases annually
3. Automatic Program Closure
4. Prospective Versus Retrospective Program Review
5. Cardiac Surgery Planning Regions and Impact on Programs within, or in Adjacent Regions

The state has not yet had experience in assessing and applying the proposed regulations for cardiac surgery and because the consequences would be catastrophic for our current plan, we therefore ask that the cardiac surgery portion of the proposed regulations be withdrawn or amended as follows:

1. Delay the promulgation of the cardiac surgery sections of the proposed regulations until the implications of the new waiver and market share analyses are more clear;
2. Provide a mechanism to recognize the importance of a cardiac surgery program to a robust trauma center, like the one at Prince George's Hospital, and preserve the operation of the program;
3. Provide an appropriate response time for program development should a Plan of Correction be requested to include the unique circumstance involving Prince George's Hospital and the University of Maryland Medical System and/or;
4. Retract/modify the provisions discussed above

We believe that the plans for a dramatic revitalization of the program will produce the outcomes necessary to demonstrate quality we are all committed to provide in a reasonably short timeframe.

Thank you for your consideration and support as we implement the plan that will improve quality and access to care that Prince George's County has worked so long to secure.

Sincerely,

Rushern L. Baker, III
County Executive

Mel Franklin, Chair
Prince George's County Council

cc: The Honorable Martin J. O'Malley, Governor
The Honorable Anthony G. Brown, Lieutenant Governor
The Honorable Thomas V. Mike Miller, Jr., Maryland State Senate President
The Honorable Michael E. Busch, Speaker, Maryland House of Delegates
The Honorable Joan Carter Conway, Chair, Senate Education, Health, and Environmental
Affairs Committee
The Honorable Thomas M. Middleton, Chair, Senate Finance Committee
The Honorable Peter A. Hammen, Chair, Health and Government Operations Committee
The Honorable Paul G. Pinsky, Senate Chair, Joint Committee on Administrative, Executive,
and Legislative Review
The Honorable Samuel I. Rosenberg, House Chair, Joint Committee on Administrative,
Executive, and Legislative Review
Ben Steffen, Executive Director, Maryland Health Care Commission