



CATHOLIC HEALTH EAST

October 22, 2013

James B. Falahee, Jr., J.D., Chairperson
Certificate of Need Commission
Capital View Building
201 Capital View Building
Michigan Department of Community Health
Lansing, MI 48913

RE: Surgical Services

Dear Chairman Falahee:

CHE-Trinity Health Michigan would like to thank the Certificate of Need Commission for the opportunity to comment on what, if any, changes need to be made to the Certificate of Need Standards.

CHE-Trinity Health Michigan supports the continued regulation of Surgical Services under Certificate of Need. CHE-Trinity Health Michigan does not believe specific changes to these standards are necessary at this time.

Respectfully,

A handwritten signature in blue ink, appearing to read "Garry C. Faja".

Garry C. Faja
President and CEO
Saint Joseph Mercy Health System
Southeast Michigan Region

A handwritten signature in blue ink, appearing to read "Roger W. Spoelman".

Roger W. Spoelman
Regional President and CEO
Mercy Health West Michigan

**Corporate Planning**

1 Ford Place, 3B
Detroit, MI 48202-3450
(313) 874-5000 Office
(313) 874-4030 Fax

October 23, 2013

James B. Falahee, Jr, J.D.
CoN Commission Chairperson
Capital View Building
201 Townsend Street
Lansing, MI 48913

Dear Commissioner Falahee:

Henry Ford Health System (HFHS) would like to offer comments on the proposed Certificate of Need (CoN) review Standards for Surgical Services.

HFHS strongly supports continued regulation of Surgical Service and offers the following suggestion to streamline the current standards:

- There are numerous references to Endoscopy and Cystoscopy, in the current Standards. References to these could be removed from the Standards as they do not correlate with any volume requirements defining need and therefore add unnecessary complexity to the Standards. In addition, tracking of Dedicated Endoscopy and Cystoscopy rooms and volumes could be discontinued on the CoN Survey.

HFHS appreciates the opportunity to comment on the Surgical Services Standards and commends both the CoN Commission and the Department on their continuing work to improve and add value to the CoN processes.

Respectfully,

A handwritten signature in blue ink that reads "Karen E. Kippen".

Karen E. Kippen
Director, Planning & CON Strategy

From: DoNotReply@michigan.gov
To: [MDCH-ConWebTeam](#)
Subject: October 9, 2013 Public Hearing Written Testimony (ContentID - 147062)
Date: Thursday, October 24, 2013 2:20:58 PM

1. Name: Sean Gehle
2. Organization: Ascension Health - Michigan
3. Phone: 517-482-1422
4. Email: sean.gehle@stjohn.org
5. Standards: SS
6. Testimony: Ascension Health - Michigan supports continued regulation of Surgical Services and recommends no changes to the Surgical Services standard.
7. Testimony:

From: DoNotReply@michigan.gov
To: [MDCH-ConWebTeam](#)
Subject: October 9, 2013 Public Hearing Written Testimony (ContentID - 147062)
Date: Monday, October 21, 2013 10:54:35 AM

1. Name: Dennis McCafferty
2. Organization: The Economic Alliance for Michigan
3. Phone: 248-596-1006
4. Email: DennisMcCafferty@EAMOnline.org
5. Standards: SS
6. Testimony: Other than some specialized surgical clinics that may be wanting to get their office surgery rooms re-classified as a Freestanding Surgical Suite to improve their Medicare reimbursement, we not aware of any other issues for this standard? Depending upon what issues are raised in Public Comment, we would think that a workgroup would be sufficient.
7. Testimony:

SPECTRUM HEALTH

Spectrum Health System
100 Michigan Street NE
Grand Rapids, MI 49503-2560

October 23, 2013

James Falahee, Chair
Certificate of Need Commission
c/o Michigan Department of Community Health
Certificate of Need Policy Section
Capitol View Building, 201 Townsend Street
Lansing, Michigan 48913

RE: Surgical Services CON Standards

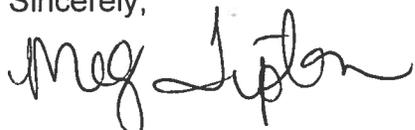
Dear Mr. Falahee,

This letter is written to offer the comments of Spectrum Health on the CON Review Standards for Surgical Services that went into effect on February 27, 2012.

We believe that the CON Review Standards for Surgical Services have served Michigan based hospitals and healthcare organizations very well. These standards have assured the availability of sufficient surgical facilities to meet the needs of Michigan citizens, while enabling Michigan's health care organizations to provide quality surgical care to their patients.

Spectrum Health appreciates the opportunity to comment on these Standards and in doing so we would recommend that there is no need to open the CON Review Standards for Surgical Services.

Sincerely,



Meg Tipton
System Regulatory Consulting Specialist
Spectrum Health



University of Michigan
Hospitals and Health Centers

Operations and Support Services

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October 23, 2013

James B. Falahee, J.D. - CoN Commission Chairperson
Certificate of Need Policy
Capitol View Building
201 Townsend Street
Lansing, MI 48913

RE: Surgical Services - Certificate of Need Standards Review

Dear Commissioner Falahee:

This letter is written as formal testimony pertaining to the Certificate of Need (CoN) Review Standards for Surgical Services. The University of Michigan Health System (UMHS) supports the overall regulations for this service.

With substantive changes recently adopted by the CoN Commission, it is too early to objectively evaluate the effects these changes are having on cost, quality and access. UMHS recommends not reopening these standards until the next review cycle in 2017.

Thank you for allowing the University of Michigan Health System to provide these comments for consideration.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'SES', with a long, sweeping flourish extending to the right.

Steven E. Szelag