

From: DoNotReply@michigan.gov
To: [MDCH-ConWebTeam](#)
Subject: October 9, 2013 Public Hearing Written Testimony (ContentID - 147062)
Date: Monday, October 21, 2013 10:51:28 AM

1. Name: Dennis McCafferty
2. Organization: The Economic Alliance for Michigan
3. Phone: 248-596-1006
4. Email: DennisMccafferty@EAMOnline.org
5. Standards: OHS
6. Testimony: We just spent the last two years reviewing this Standard and the final version won't take effect until this November. Why would this Standard need to be re-opened before we have an opportunity to see how it is working? We would strongly recommend that we do not consider reviewing this standard next year.
7. Testimony:



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: Open Heart Surgery 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 Open Heart Surgery Services under Certificate of Need. CHE-Trinity Health Michigan supports the Open Heart Surgery Services standards the CON Commission approved at its September 17, 2013, meeting. The language within these most recent Open Heart Surgery Services standards was thoughtfully considered and supported by the Open Heart Surgery Standards Advisory Committee in 2012. CHE-Trinity Health Michigan does not believe further 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



October 23, 2013

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

Corporate Planning

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

Dear Commissioner Falahee:

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

HFHS strongly supports continued regulation of Open Heart Surgery and fully supports the pending changes in the Standards including:

- The proposed volume changes with regard to lowering the attending surgeon annual volume requirement to 50 adult OHS cases and reducing the annual maintenance volume requirement to 150 adult OHS cases
- The use of the STS Composite Star Rating System as a means to measure OHS quality and risk-adjusted outcomes, as well as serve as an additional method for assuring compliance with the OHS standards.

Understanding that the thoughtful work of the Department, the Standard Advisory Committee and the Commission has not been fully implemented as the revised Standards are not yet effective, HFHS does not support re-opening the Open Heart Standards for review in 2014.

Respectfully,

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

Karen E. Kippen
Director, Planning & CON Strategy

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: Open Heart Services CON Standards

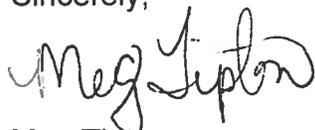
Dear Mr. Falahee,

This letter is written to offer the comments of Spectrum Health on the CON Review Standards for Open Heart Services.

We believe that the CON Review Standards for Open Heart Services should not be opened for review at this time. In order to address issues that were identified outside of the regular schedule of review, the flexibility of the CON process allowed these standards to be opened up in 2011. Through this process, the Open Heart Standards underwent a thorough review, were revised and just received approval at the CON Commission meeting on September 17, 2013. The newly approved standards are expected to go into effect, following the time period allotted for review by the Joint Legislative Committee. Furthermore, out of respect and appreciation for the extensive time and attention given by subject matter experts during this most recent review, requesting another review period at this time would be unnecessary.

Therefore it is our recommendation that the Open Heart Standards, as approved, should be put into practice before another CON standards review occurs. Spectrum Health appreciates the opportunity to comment on these Standards.

Sincerely,



Meg Tipton
System Regulatory Consulting Specialist
Spectrum Health



Operations and Support Services
300 N. Ingalls, 4A11-3
Ann Arbor, MI 48109-5428
(734) 647-1163
(734) 647-0547 fax
sszelag@med.umich.edu

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: Open Heart Surgery and Cardiac Catheterization - 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 Open Heart Surgery and Cardiac Catheterization. The University of Michigan Health System (UMHS) supports the overall regulations for these services.

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 'Szelag'.

Steven E. Szelag