



West Virginia University Hospitals

*Handwritten:* 12/11, 2007

*Handwritten signatures:* S. Chambers, S. Kapourales, M. White, D. Stepp, C. Dellinger, M. Kapinos, C. Haugen

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RECEIVED  
WV HEALTH CARE AUTHORITY

December 7, 2007

Dayle D. Stepp, Director  
Certificate of Need  
West Virginia Health Care Authority  
100 Dee Drive  
Charleston, WV 25311-1600

Dear Mr. Stepp,

WVUH would like to offer the following comments regarding the proposed cardiac catheterization standards. Our concern is limited to areas of the state not proximal to any other state program and not operating a cardiac surgery program. Under the proposed standards, such areas would have to perform over 300 procedures annually in a diagnostic lab for three years, then perform a minimum of 36 primary PCI procedures annually for three years before an application could be filed for an elective therapeutic program. Attracting and retaining credentialed cardiologists for over six years while expecting them to maintain the minimum annual interventions (75) would be very difficult in areas of the state that are not close to an existing state program.

To address this issue WVUH requests the consideration of the following additional language to conclude section IV of the standards:

Development of Primary and Therapeutic services can occur simultaneously for programs in the state which meet the following criteria:

- The service area of the program population is at least 100,000 and is further than 100 driving miles from an existing elective therapeutic cardiac catheterization program in the state of West Virginia.
- The program will be located at a hospital licensed for a minimum of 150 beds which has operated a diagnostic cardiac catheterization program for at least one year and has performed at least 300 procedures in that year.
- The program will have at least two interventional cardiologists who have performed 75 interventions in the past 24 months with credentials to practice at an existing program in the state of West Virginia.
- The program demonstrates the ability to meet all other criteria listed in the Cardiac Catheterization Standards not addressed by the above three items.

Office of the President  
Ruby Memorial Hospital  
West Virginia University Children's Hospital  
Jon Michael Moore Trauma Center  
Chestnut Ridge Hospital

If you should have any questions or comments regarding this matter, please feel free to contact me at (304) 598-4335. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in blue ink that reads "Bruce McClymonds". The signature is written in a cursive style with a large initial "B" and "M".

Bruce McClymonds  
President/CEO