

Comments from Brian Moore, Mission Health

From: Brian Moore, Ex Dir Public Policy & Reg Rel [<mailto:Brian.Moore@msj.org>]

Sent: Tuesday, October 25, 2016 3:38 PM

To: Bennett, Paige

Cc: mvicario@ncha.org

Subject: OR Methodology Comments

Paige, I am submitting some general comments and observations regarding the OR Methodology Workgroup's set of questions articulated at the Oct 11th meeting. Thank you for the opportunity to comment. The observations are organized according to policy questions in the format Mike Vicario was kind enough to provide.

- In recent years the 28 special petitions for operating rooms have been submitted.
 - **There has been a regulatory requirement regarding new need determinations during the reporting out of the single specialty demonstration project. The results and subsequent reviews are in their early stages.**
- Discussions on a methodology using Truven data revealed complications due to the lack of a location of surgery indicator, incomplete participation by ASCs, and case volume inconsistencies from the licensure form data.
 - **A single "source of truth" would be valuable to assess utilization volumes, patterns etc.,**
- How should procedure rooms and procedures performed in them be treated?
 - **According to patient care quality and licensure standards**
- How are decisions made regarding the use of an operating room or a procedure room?
 - **According to patient care quality and licensure standards**
- Should the methodology's 3/1.5 hour per inpatient/outpatient surgery procedure time or other methodology assumptions be re-considered?
 - **The times per case and procedure should be studied and updated.**
- Interventional radiology procedures are not included in the methodology. Are they in the Truven database?
 - **This is not clear. It may be helpful for Truven to provide insight**
- Should the methodology use a tiered system based on the number of ORs or some other factor? What are the case time differences between urban and rural hospitals?
 - **Access to rural capacity should be preserved**
- There is still interest in considering use of Truven data.
 - **Yes.**
- The methodology should be simplified.
 - **The methodology should be simplified and linked to community need.**