

SEP 18 2019

RECEIVED

September 16, 2019

Honorable Emily T. Marsal  
Executive Director  
State Health Planning and Development Agency  
100 North Union Street  
RSA Union Building, Suite 870  
Montgomery, AL 36104

Re: Non-Reviewability Determination Requests

On behalf of the Alabama Hospital Association and its member facilities, we, the Board of Trustees, write to express concern over what we see as a developing trend with the frequency of requests for letters of non-reviewability determinations for physician office interventional and therapeutic procedures. There have been a growing number of non-reviewability requests that focus more on interventional procedures and less on diagnostic procedures that appear to stretch the boundaries for non-reviewability letters that have been granted in the past. Our primary goal is to ensure patient safety and quality clinical outcomes for all the individuals that are served in our communities. If a patient is having an interventional procedure done in a physician's office setting and complications arise, the need for an ambulance transfer (and the delay in necessary treatment for the complication) to an acute care hospital could be the difference between life or death. We strongly believe most interventional procedures should be done in a general acute care hospital setting, so that any unexpected changes in a patient's status could be quickly alleviated by ready access to medical care such as anesthesia back up or blood bank access.

We trust that there is an appropriate avenue for access to certain diagnostic procedures to be performed within a physician's office setting that is predicated on patient safety with quality clinical outcomes. However, the growing number of interventional/therapeutic procedures being done in a physician's office setting where the providers are requesting letters of non-reviewability is alarming. This growing trend blurs the lines between diagnostic procedures that can safely be performed within a physician's office setting and more risk based interventional/therapeutic procedures that originally could only be performed in a hospital setting.

We respectfully request the State Health Planning and Development Agency to make sure that patient safety is considered first and foremost in every decision when reviewing determinations that may include interventional and therapeutic procedures to be performed outside of a general acute care hospital setting.

Sincerely,

Luke Standeffer  
Chairman, AlaHA Board of Trustees  
Chief Executive Officer  
Northport Medical Center

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Chief Executive Officer  
Escambia County Healthcare Authority

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Immediate Past Chairman, AlaHA Board of Trustees  
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