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July 12, 2019

April Robertson
One Davis Square, Suite 100, East
Charleston, WV 25301

Dear Ms. Robertson-

Re: LEGISLATIVE RULE 65CSR9, CRITICAL ACCESS HOSPITALS

On behalf of the West Virginia Hospital Association and its 63 member hospitals and health systems, we respectfully submit this letter to provide public comments in support of the above referenced **Legislative Rule 65CSR9, Critical Access Hospitals**.

During the 2019 Legislative Session, the WVHA proactively developed and advocated for the passage of SB 593 that will allow a Critical Access Hospital to convert to a Community Outpatient Medical Center in order to maintain access to care in our rural communities. This rule is necessary to operationalize SB 593.

For a rural community to retain local emergency care, new solutions are needed. The establishment of a Community Outpatient Medical Center designation will help ensure that patients in rural communities maintain access to essential emergency and outpatient services, while providing enhanced transportation to inpatient hospitals.

We appreciate the opportunity to submit comments in support of this legislative rule. We look forward to working with the DHHR on this rule, and other related issues, to allow our Critical Access Hospitals to maximize this alternative healthcare delivery model.

If you have any questions or concerns, please contact me at (304) 353-9720.

Sincerely,

Brandon Hatfield
General Counsel

65 CSR 9 Critical Access Hospitals
Department of Health and Human Resources
Health Care Authority

Summary of Public Comments:

Comment

The comment from the WV Hospital Association was in support of the rule and suggested no changes.

Response

The Department has reviewed this comment and finds that no additional changes are necessary.