



Florida

CHAPTER

Florida Chapter
American College of Cardiology

3208 E. Colonial Drive, Suite 264
Orlando, FL 32803
www.accfl.org

March 12, 2020

On behalf of the Florida Chapter of the American College of Cardiology (FL-ACC), I'm writing to share concerns regarding proposed changes to rule 59A-3.246 Licensed Programs, in particular the changes proposed for Level I Adult Cardiovascular Services.

Under current rules, level I adult cardiovascular service providers are required to report data to a national registry to measure performance against national quality and outcome benchmarks. The proposed rule removes that requirement but does not offer an alternative method for meeting those benchmarks.

Participation in a national registry helps hospitals learn and understand not only from hospitals within the state but across the country, by ensuring that all sites are using the same process for monitoring performance. The lack of specificity regarding benchmarks in the proposed rule will cause confusion for providers and institutions. There could be far fewer reports submitted and no common method of measurement for those that are submitted. Registry participation has proven extremely effective in identifying and analyzing data and without requiring participation or an acceptable alternative, there is no way to determine if the rule's required benchmarks are being met.

We urge the Department to provide clear direction on the methods and programs institutions and providers may deploy to meet the quality and benchmark requirements.

Sincerely yours,

David Perloff, MD, FACC
President