



MARYLAND
Health Care
Commission

Certificate of Ongoing Performance for Primary and Elective PCI Services

HOLY CROSS HOSPITAL

MAY 15, 2025

Summary of Standards for PCI Certificates of Ongoing Performance (COMAR 10.24.17)



- ▶ Data Collection
- ▶ Institutional Resources
- ▶ Quality
- ▶ Patient Outcome Measures
- ▶ Physician Resources
- ▶ Volume
- ▶ Patient Selection

Staff Analysis and Conclusions



Summary of Standard	Applicant Information and Staff Analysis	Recommend Approval
<p>10.24.17.07D(4)(a) – PCI services shall be available 24 hours per day, seven days per week.</p>	<p>Once in 2020 an on-call interventionalist could not be reached resulting in a patient transfer. Holy Cross identified the source of the issue and reported its plans for corrective action to MHCC staff, less than a week after the incident. There have been no subsequent issues.</p>	<p>Yes</p>
<p>10.24.17.07D(4)(b) – DTB of 90 minutes or less for at least 75 percent of appropriate patients.</p>	<p>The DTB standard was waived for CY 2020 and most of 2021. Holy Cross met the standard in 6 of 9 quarters between CY 2020 and CY 2023, when the standard was applicable.</p> <p>In many cases, non-system reasons, outside the hospital’s control led to delays. Some system errors also contributed to the delays. The hospital met monthly and developed various corrective actions to address the delays in DTB times.</p>	<p>Yes*</p>

* With condition

Staff Analysis and Conclusions



Quarter	Total Primary PCI Volume	Cases with DTB <= 90 minutes	Percent of Cases with DTB <=90 Minutes
CY 2020 Q1	20	17	85.0%
CY 2020 Q2	12	6	50.0%
CY 2020 Q3	13	12	92.3%
CY 2020 Q4	14	12	85.7%
CY 2021 Q1	20	14	70.0%
CY 2021 Q2	24	21	87.5%
CY 2021 Q3	9	8	88.9%
CY 2021 Q4	13	10	76.9%
CY 2022 Q1	22	17	77.3%
CY 2022 Q2	10	8	80.0%
CY 2022 Q3	23	12	52.2%
CY 2022 Q4	23	15	65.2%
CY 2023 Q1	18	12	66.7%
CY 2023 Q2	14	8	57.1%
CY 2023 Q3	17	12	70.6%
CY 2023 Q4	13	9	69.2%

Source: MHCC Staff analysis of ACC-NCDR CathPCI data, January 1, 2020 – Dec. 31, 2023.

DTB Times Excluding Non-System Delays



Quarter	Total Primary PCI Volume	Cases with DTB <= 90 minutes	Percent of Cases with DTB <=90 Minutes
CY 2021 Q1	14	14	100.0%
CY 2021 Q2	21	21	100.0%
CY 2021 Q3	8	8	100.0%
CY 2021 Q4	10	10	100.0%
CY 2022 Q1	18	17	94.4%
CY 2022 Q2	8	8	100.0%
CY 2022 Q3	16	12	75.0%
CY 2022 Q4	18	14	77.8%
CY 2023 Q1	13	12	92.3%
CY 2023 Q2	12	8	75.0%
CY 2023 Q3	14	12	85.7%
CY 2023 Q4	9	9	100.0%

Source: MHCC Staff analysis of ACC-NCDR CathPCI data, January 1, 2020 – Dec. 31, 2023 and Responses from Holy Cross

Staff Analysis and Conclusions



Summary of Standard	Applicant Information and Staff Analysis	Recommend Approval
<p>10.24.17.07D(8)(b) –</p> <p>The target volume for primary PCI is 11 cases annually.</p>	<p>Each interventionalist performed at least 11 primary PCI cases annually during the review period, except one interventionalist in 2020, when the standard was waived, due to the COVID-19 pandemic. For another interventionalist, staff was not able to confirm 11 cases were performed in 2023, but the hospital reported the standard was met.</p>	<p>Yes</p>



Recommendation and Condition

MHCC staff recommends that the Commission find that Holy Cross meets the requirements for a Certificate of Ongoing Performance. Staff recommend that the Commission issue a Certificate of Ongoing Performance that permits Holy Cross to continue providing primary percutaneous coronary intervention services for three years subject to the following condition:

Holy Cross shall submit an action plan that describes changes that the hospital plans to implement or already has implemented to improve the hospital's compliance with the DTB time standard in COMAR 10.24.17.07D(4)(b) by July 1, 2025. Holy Cross shall also provide an explanation of the reason for delay for each primary PCI case with a DTB time over 90 minutes and any corrective action taken for each quarter of CY 2024 by June 30, 2025; for the first two quarters of CY 2025 by August 31, 2025; and for the second two quarters of CY 2025 by March 2, 2026.