



Maryland
Hospital Association

MHA
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October 9, 2014

Donna Kinzer
Executive Director, Health Services Cost Review Commission
4160 Patterson Avenue
Baltimore, Maryland

Dear Ms. Kinzer:

On behalf of the 67 member hospitals of the Maryland Hospital Association (MHA), we are writing to comment on the Health Services Cost Review Commission (HSCRC) staff recommendation on *Maryland's Statewide Health Information Exchange, the Chesapeake Regional Information System for our Patients (CRISP): Additional FY 15 HSCRC Funding*. The recommendation describes the unique value CRISP can provide to hospitals and to policymakers in producing data and analyses that leverage the enterprise master patient identifier and recommends increasing hospital rates to support this valuable work. In addition, it recommends using hospital rate funding as authorized by the Budget Reconciliation and Financing Act of 2014 to support the HSCRC Provider Alignment and Care Coordination Work Groups charged with identifying potential shared care management resources and developing strategies that would further align other providers' incentives with those of hospitals under the all-payer demonstration.

MHA seeks to ensure that any hospital rate increases fund only activities that directly contribute to hospitals' ability to carry out their missions in service to their communities. The reports and data sets CRISP has been providing to hospitals and the commission do just that. Hospitals are already finding value in the CRISP readmission reports, which allow them to identify and intervene when patients are readmitted to their own or another hospital. Likewise, the addition of the CRISP enterprise identifier to the HSCRC case-mix data has allowed HSCRC to link current Medicaid beneficiaries with their historical utilization to estimate future uncompensated care reductions with a level of accuracy not previously possible. These types of tools used by hospitals and policymakers add significant value at a very reasonable cost.

MHA recognizes the important and timely role of statewide planning in realizing the health care delivery transformation as envisioned and required under the new waiver agreement and we appreciate the HSCRC's diligence in identifying a suitable funding source to support the work groups charged with these tasks. The Budget Reconciliation and Financing Act of 2014 included three provisions related to hospital rates: it reduced the Maryland Health Insurance Plan assessment funded through hospital rates; required Medicaid savings due to waiver implementation to be netted against the Medicaid deficit assessment; and authorized up to \$15 million to be put back into rates to fund state or regional activities that support implementation of the waiver. We believe the work of the HSCRC's Provider Alignment and Care Management Work Groups fulfills the intended purpose of the funding authorized by the Budget Reconciliation and Financing Act. However, we urge caution and additional review before using hospital rates to fund implementation of any work group recommendations.

We appreciate the opportunity to participate in this process and to comment on this recommendation. If you have any questions, please contact me.

Sincerely,

Traci La Valle, Vice President



Donna Kinzer
Executive Director
Health Services Cost Review Commission
4160 Patterson Avenue
Baltimore, Maryland 21215

Dear Ms. Kinzer:

On behalf of MedChi and LifeSpan, two organizations that represent key non-hospital stakeholders, we strongly believe that the success of the implementation of the Waiver depends on alignment with post acute care providers and the creation of effective care coordination models across various settings. To assist in the development of these models, we support the Commission's creation of an Alignment and Care Coordination workgroup, including the need to retain outside consultants to assist in addressing key issues surrounding these topics. Therefore, MedChi and LifeSpan support the Commission's request to fund consulting services through rates in order to best achieve this purpose and, ultimately, the goals of the Waiver. If you have any questions, please feel free to contact us. Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Gene M. Ransom III".

Gene Ransom
President and CEO
MedChi

Sincerely,

A handwritten signature in black ink that reads "Isabella Firth".

Isabella Firth
President
LifeSpan