



Maryland
Hospital Association

July 10, 2020

Katie Wunderlich, Executive Director
Adam Kane, Chairman
Health Services Cost Review Commission
4160 Patterson Avenue
Baltimore, Maryland 21215

Dear Ms. Wunderlich and Chairman Kane:

On behalf of Maryland's 61 member hospitals and health systems, we write with a recommendation regarding the Care Transformation Initiative (CTI).

As we stated in our October 2019 comment letter, we support the intent to recognize savings from CTIs. Hospitals know it is important to demonstrate how they change care to produce per capita savings under the contract and they appreciate opportunities to learn from successful initiatives.

Yet, the enormous impact the COVID-19 pandemic has had on hospitals—and the uncertainty of its future wave pattern—raises concerns about implementing a complex new program at this time.

Now is not the time to implement a new, untested program with financial risk. We urge HSCRC to place a moratorium on financial risk components of the CTI program.

Hospital leaders and clinicians must continue to focus energies on fighting the disease, even as it seems Maryland is limiting the spread. Additionally, hospitals need more time to see how various initiatives should be designed or re-designed to incorporate emerging lessons from COVID-19.

We recommend a one-year pilot with measurement but without penalties or rewards.

We appreciate your consideration of our input on this very challenging issue. The CTI program is an important tool to demonstrate how Maryland hospitals deliver care better. We look forward to working with your staff over the next year to assess the program and make necessary adjustments.

Sincerely,

Traci LaValle
Senior Vice President, Quality & Health Improvement