



Maryland  
Hospital Association

October 21, 2020

Dr. Alyson Schuster  
Deputy Director, Quality Methodologies  
Health Services Cost Review Commission  
4160 Patterson Avenue  
Baltimore, Maryland 21215

Dear Dr. Schuster:

On behalf of the Maryland Hospital Association's 61 member hospitals and health systems, we appreciate the opportunity to comment on the Health Services Cost Review Commission's (HSCRC) *Draft Recommendations for the Maryland Hospital Acquired Conditions Program for Rate Year 2023*. We appreciate the collaborative process to shape the policy in the best interest of high-quality care for all Marylanders, especially in these extremely trying times.

We support the staff's recommendations, which remain largely unchanged from the existing policy.

We do want to caution against making changes to the rate year 2023 prospective revenue adjustment scale. In principle, we understand the intent of considering changes to the scale. However, we do not understand the impact of the ongoing COVID-19 Public Health Emergency on the mix of patients presenting to hospitals. The statewide mix of patients and their complication rates are a critical component of the Maryland Hospital Acquired Conditions program's risk adjustment. Now is not the time to change policies and raise hospital risk and uncertainty.

We look forward to continuing to work with the commission on this and future policies.

Sincerely,

Brian Sims, Director, Quality & Health Improvement

cc: Adam Kane, Esq. Chairman  
Joseph Antos, Ph.D., Vice Chairman  
Victoria W. Bayless  
Stacia Cohen, RN, MBA

John M. Colmers  
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