



Maryland
Hospital Association

November 23, 2022

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 60 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 (MHAC) Program for Rate Year 2025*. **We support the staff's recommendations, which are largely unchanged from the existing policy.**

We support the staff's recommendation to re-include Potentially Preventable Complication (PPC) 47 Encephalopathy into the payment program due to rising rates and previously set criteria for inclusion. However, we believe it is important that hospitals can focus on addressing PPCs that are both clinically significant and have room for improvement. We look forward to working with staff to review trends in both payment and non-payment PPCs to ensure we maintain a focused set of PPCs in the program.

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

Sincerely,

Brian Sims
Vice President, Quality & Equity

CC: Adam Kane, Esq., Chairman
Joseph Antos, PhD, Vice Chairman
Victoria W. Bayless
James Elliott, M.D.
Maulik Joshi, DrPH
Stacia Cohen, RN, MPA
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