



Maryland
Hospital Association

December 1, 2023

Jon Kromm
Executive Director
Health Services Cost Review Commission
4160 Patterson Avenue
Baltimore, MD 21215

Laura Herrera Scott, M.D.
Secretary of Health
Maryland Department of Health
Herbert R. O'Connor State Office Building
201 West Preston Street
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Secretary Herrera Scott and Mr. Kromm:

On behalf of the Maryland Hospital Association's (MHA) 62 member hospitals and health systems, we appreciate the opportunity to comment on the States Advancing All-Payer Health Equity Approaches and Development (AHEAD) Model Notice of Funding Opportunity (NOFO).

The AHEAD Model builds on many of the health care reform activities in Maryland: all-payer hospital global budgets, Medicaid alignment, promoting health equity, and advanced primary care.

If Maryland chooses to participate in the demonstration, it is imperative to understand what federal waivers the state might retain, such as exclusion from Medicare's inpatient- and outpatient prospective payment systems (PPS) and value-based payment (VBP) program. This is particularly salient in areas where the state instituted methodologies or programs that meet or surpass the Model's objectives.

Given the limited details available in the NOFO, we must understand how the state might operationalize the Model in parallel to the aforementioned waivers, which will require an open dialogue with the Centers for Medicare & Medicaid Innovation (CMMI). Finally, thoughtful HSCRC and state policy actions, while downstream, are critically important to hospital field and Model success.

We appreciate the Health Services Cost Review Commission (HSCRC)'s leadership in convening advisory councils, which will assess the opportunity for Maryland to participate in the Model. MHA plans to engage its governing bodies to inform the hospital field's input on our path forward. As such, we will provide more detailed feedback at a later date.

Hospitals are the only stakeholders financially accountable for total cost of care performance, a strong partnership between the state and the hospital field is critical. We appreciate you allowing hospital representatives on each AHEAD advisory committee and hearing our input on our path forward.

Thank you again for bringing together stakeholders from across the state to determine Maryland's path forward. We are committed to working with you to ensure the best possible outcome for all Marylanders.

Sincerely,



Brett McCone
Senior Vice President, Health Care Payment

Cc: Josh Sharfstein, M.D., Chair, HSCRC