



Maryland
Hospital Association

August 3, 2018

The Honorable Seema Verma
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
Hubert H. Humphrey Building, Room 445-G
200 Independence Avenue, S.W.
Washington, D.C. 20201

Re: Maryland Section 1332 Waiver Comments

Dear Administrator Verma:

On behalf of the 64 hospital and health system members of the Maryland Hospital Association, I offer whole-hearted support for Maryland's application for a waiver under section 1332 of the Affordable Care Act and for ongoing state efforts to develop a reinsurance program.

Maryland's all-payer rate setting system has been in place for more than 40 years and has steadily advanced innovative, cost-saving health care concepts with longstanding bipartisan support. Its goal: improve the health of Marylanders and the efficiency of the health care system by ensuring the right care, at the right time, in the right setting.

Broad-based, continuous health coverage is crucial to achieving this goal. It will be all the more important under the state's new agreement with CMS, known as the Maryland Total Cost of Care Model. We are so grateful for your championing the Maryland model within the federal government and for your encouraging words at the signing ceremony in Annapolis on July 9.

The 1332 waiver will bolster access to affordable coverage, ensuring that more Marylanders receive preventive services and care in the most appropriate settings. This will reduce avoidable hospital utilization and lower the cost of care across the continuum. Affordable, stable coverage also improves access to substance use disorder and mental health services, particularly important given Maryland's unrelenting opioid crisis.

We appreciate your leadership and the opportunity to comment. Please contact me should you need additional information.

Sincerely,

Robert F. Atlas
President & CEO