



Maryland  
Hospital Association

October 27, 2017

Diana Kemp  
Regulations Coordinator  
Health Services Cost Review Commission  
4160 Patterson Avenue  
Baltimore, Maryland 21215

Dear Ms. Kemp:

**Comments Regarding 10.37.08 Conduct of Public Meetings**

In order to improve the openness and transparency of the commission policy-making process, we recommend that Sub-section (.04) (Agenda) be substantially re-written. In developing the agenda for each public meeting, the executive director should be required to have *all* materials for *any* item on the agenda available for public review at least one (1) week prior to the public meeting, to allow for sufficient review by commissioners and the public before those items are discussed. In addition, to facilitate broad-based stakeholder input, public comment should be allowed on any item on the agenda, including those which may be included for information only by commission staff or other stakeholders. Finally, for the past few years, the commission has followed a process of having staff present policy recommendations in draft form in one month, followed by final action on a final staff policy recommendation at a subsequent meeting. We support this approach, and would recommend codifying that practice in this section of the regulation.

Under Sub-Section (.05) (Records), we recommend that, in addition to making meeting minutes available for public inspection at its offices, the commission should make minutes available on its website after they have been approved at a public meeting.

Finally, under Sub-section (.06) (Voting), we recommend deleting sub-section (D). It is our view that any commission vote should take place in a public meeting, so allowing each commissioner one vote on matters submitted for vote “between public meetings” would be inappropriate.

Sincerely,

Michael B. Robbins  
Senior Vice President