



Maryland
Hospital Association

January 24, 2018

Alyson Schuster, Ph.D.
Associate Director, Performance Measurement
Health Services Cost Review Commission
4160 Patterson Avenue
Baltimore, Maryland 21215

Dear Alyson:

On behalf of the Maryland Hospital Association's 64 member hospitals and health systems, we appreciate the opportunity to comment on the Health Services Cost Review Commission's *Draft Recommendation for the Maryland Hospital-Acquired Conditions Program for Rate Year 2020*.

We agree with staff's recommendation to leave unchanged many features of the policy as the current version has been constructed to help the state meet the requirements of the final year of the All-Payer Model. We appreciate the thoughtful consideration of the recommended modifications to address concerns raised by the hospital field about very low-volume occurrences improperly affecting performance standards and causing volatility in hospitals' scores. As the hospital field has continued to reduce the actual number of complications, risk-adjusting at a DRG-SOI level, which contains more than 1,200 combinations, results in a very small percentage of those 1,200-plus cells having sufficient volume to show stable values. We agree with HSCRC staff's assessment that this potentially penalizes hospitals for random variation as opposed to poor performance and support the recommendations to address the problem.

We look forward to continuing to work with the commission on modifications to the complications policy for performance year 2019 (fiscal year 2021). Should you have any questions, please call me at 410-540-5087.

Sincerely,

Traci La Valle, Vice President

cc: Nelson J. Sabatini, Chairman
Joseph Antos, Ph.D., Vice Chairman
Victoria W. Bayless
John M. Colmers
Adam Kane

Jack C. Keane
Donna Kinzer, Executive Director
Dianne Feeney, Associate Director, Quality Initiatives
Allan Pack, Director, Population-Based Methodologies