



Maryland
Hospital Association

October 27, 2017

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

Dear Ms. Kemp:

On behalf of Maryland's 47 acute care hospitals, we appreciate the opportunity to submit comments as part of the mandatory Regulatory Review for years 2012-2020, concerning Subtitle 37 Health Services Cost Review Commission. We have attached specific comments on the following chapters:

- 10.37.02 Standards of Rate Review
- 10.37.03 Types and Classes of Charges Which Cannot Be Charged Without Prior Commission Approval
- 10.37.08 Conduct of Public Meetings
- 10.37.09 Fee Assessment for Financing Hospital Uncompensated Care
- 10.37.10 Rate Application and Approval Procedures
- 10.37.11 Rules of Procedure; Related Institutions

Last month, MHA submitted written comments on Chapter 10.37.10, Rate Application and Approval Procedures; we have attached an additional copy of that comment letter with this submission.

As a general rule, our comments on each of these regulations are designed to update them in a manner consistent with Maryland's all-payer model, or in recognition of the many years that have passed since the regulations were established. We submit these comments in the spirit of collaboration that has been the hallmark of the commission's work to improve the rate-setting process.

We look forward to further dialogue with the commission about the comments on the attached regulations. As always, if you have any questions, please contact me at 443-561-2030.

Sincerely,

Michael B. Robbins
Senior Vice President