



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 10.37.11 Rules of Procedure: Related Institutions

More than 40 years have passed since Sub-section (.02) was promulgated. There are a number of references in sections (.02) (B) – (G) that we believe are out of date and not consistent with current commission practice, particularly with regard to the Medicaid per diem, submission of Medicaid charge information, and updates to the Medicaid rate of increase in Sub-sections (B), (E), and (F).

Also, we recommend that Sub-section (D) should be amended to apply to all patients, not just non-Medicaid, and that consideration be given to allowing hospitals less than the current advance notice of thirty (30) days before rate changes are implemented, given the need for close adherence to commission rate compliance requirements under Chapter 10.37.03.

Finally, we ask the commission consider the applicability of Sub-sections (G) and (H) in light of the modernized all-payer model.

Sincerely,

Michael B. Robbins
Senior Vice President