



Maryland
Hospital Association

December 20, 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 62 member hospitals and health systems, we appreciate the opportunity to comment on the Health Services Cost Review Commission's (HSCRC's) *Draft Recommendation for the Readmissions Reduction Incentive Program for Rate Year 2021*. We support the staff's recommendation to continue measuring attainment and improvement in the readmissions policy and to modify how attainment points are earned. We agree with using the most recent data to set targets. For this year, we agree with the approach to setting the targets and look forward to working with the HSCRC staff to identify readmissions attainment benchmarks for hospitals or groups of hospitals outside Maryland.

The inclusion of cases from specialty hospitals needs further consideration. These cases are not currently included in the aggregate monitoring reports, or the patient level reports and tools. Without the aggregate and individual data, hospitals do not have the necessary information to better manage readmissions to and from specialty hospitals.

Reducing readmissions is a key indicator of success in hospitals' commitment to patients post discharge and in managing chronic conditions in a cost-effective setting. The commission's plan to identify a cohort of hospitals or regions on which to base Maryland attainment targets is important. A realistic readmissions target that considers the possibility of an unanticipated, but lifesaving, hospitalization post discharge will ensure the policy does not inadvertently incentivize reduced access or other undesirable consequences.

We look forward to continuing to work with the commission on the readmissions policy for performance year 2019 (fiscal year 2021).

Sincerely,

Traci La Valle
Vice President, Financial Policy & Advocacy

cc: Nelson J. Sabatini, Chairman
Joseph Antos, Ph.D., Vice Chairman
Victoria W. Bayless
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