



Maryland
Hospital Association

May 20, 2020

William Hoff
Chief, Audit and Compliance
Health Services Cost Review Commission
4160 Patterson Avenue
Baltimore, MD 21215

Dear Mr. Hoff:

On behalf of the Maryland Hospital Association's 61 member hospitals and health systems, we offer our comments on the Health Services Cost Review Commission's (HSCRC) proposed relative value unit (RVU) revisions in the outpatient clinic rate center.

Hospital-based outpatient clinic services are an important component of our delivery system. As in other states, hospital-based clinics exist to provide specialized clinical services and to serve as a safety net so uninsured and underinsured patients have access to care.

The proposed changes would flatten the RVU scale and reduce the charge per outpatient clinic visit at the higher end of the scale. The recommendation would also reclassify regulated charges away from the clinic rate center to other rate centers. **Maryland's hospitals support these recommendations.**

Subsequent to the draft recommendation, HSCRC agreed to remove a fixed RVU value for billing code G0463 and to leave instructions for assigning clinic RVUs unchanged in Appendix D of the Accounting and Budget Manual. **We support these revisions from the draft recommendation.**

We appreciate HSCRC staff considering hospital field input, and Maryland's hospitals are pleased with the outcome. If you have any questions, please contact me.

Sincerely,

Brett McCone
Senior Vice President, Health Care Payment

cc: Dennis Phelps, HSCRC
William Henderson, HSCRC
Karen Teague, HSCRC