



Maryland
Hospital Association

March 13, 2024

Dr. Alyson Schuster
Deputy Director, Quality Methodologies
Health Services Cost Review Commission
4160 Patterson Avenue
Baltimore, Maryland 21215

Dear Dr. Schuster:

On behalf of the Maryland Hospital Association's (MHA) member hospitals and health systems, we appreciate the opportunity to comment in support of the Health Services Cost Review Commission's (HSCRC) Draft Recommendations for the Readmissions Reduction Incentive Program (RRIP) for Rate Year (RY) 2026.

We support the staff's proposal as it is largely unchanged from the previous policy. We appreciate the staff's recommendation to set a multi-year target effective through December 2026. We look forward to working with staff on future considerations for the RRIP, including exploring other measures for post-discharge events.

We applaud the inclusion of incentives in the RRIP for hospitals to improve within-hospital readmission disparities between patients with high social risk and those with low social risk. As we gain further insights into effective strategies across different populations with varying levels of social risk, it becomes imperative to evaluate how the current incentive and methodology can evolve to ensure equitable results statewide. We propose examining the inclusion of an attainment target in the policy. Additionally, we look forward to working closely with HSCRC staff to develop the necessary form for hospitals to identify and detail activities aimed at reducing readmission disparities.

We are committed to ongoing collaboration with staff on this and future policies.

Sincerely,

Brian Sims
Vice President, Quality & Equity

cc: Joshua Sharfstein, M.D., Chair
Joseph Antos, Ph.D., Vice Chair
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