



Maryland
Hospital Association

October 24, 2024

Alyson Schuster, Ph.D.
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 on the Health Services Cost Review Commission's (HSCRC) *Draft Recommendations for the Quality-Based Reimbursement (QBR) Program for Rate Year (RY) 2027*. As always, we look forward to continued collaboration with staff and others around the state who are interested in working together to shape policies in the best interest of high-quality care for all Marylanders.

We support the rate year 2027 payment policy recommendations and offer comments on two areas of the QBR policy:

1. Electronic Clinical Quality Measures and Core Clinical Data Elements timeline for implementation
2. Rate Year 2025 Reward/Penalty "Cut Point" alignment with national programs

Electronic Clinical Quality Measures (eCQM) and Core Clinical Data Elements (CCDE)

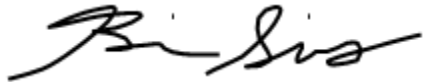
We strongly urge staff to reconsider the timeline to collect data for the development of electronic quality measure infrastructure. Hospitals have significant concerns with the misaligned submission timeline between HSCRC requirements and the Centers for Medicare and Medicaid Services (CMS) requirements. Hospitals will incur significant EHR vendor costs because of the accelerated HSCRC timeline. EHR vendors intend to be ready with new software designs in preparation for the CMS implementation timeline. An earlier timeline for Maryland means customized EHR development time and cost for Maryland hospitals. Furthermore, the new requirements have increased the need for hospital staffing and created additional administrative burden. The hospital field understands the value that digital measure infrastructure has for quality analysis and improvement, however accelerating the development of this infrastructure ahead of the nation compromises ongoing quality improvement efforts and exacerbates already strained financial resources.

RY 2025 QBR Reward Penalty “Cut-Point”

We appreciate HSCRC staff’s plans to retrospectively adjust the RY 2025 QBR reward/penalty threshold (“cut-point”) to 32%. This is more in line with national performance which has significantly declined since the original cut-point (41%) was created using national averages. We look forward to working with staff to project national performance earlier in the year to track Maryland performance in a more timely manner. If recent national performance trends continue, we would recommend permanently revising the cut-point going forward.

We look forward to continuing to work with the Commission on this and future policies.

Sincerely,



Brian Sims
Vice President, Quality & Equity

cc:

Dr. Jon Kromm, Executive Director
Dr. Joshua Sharfstein, Chairman
Dr. James Elliott
Ricardo Johnson

Dr. Maulik Joshi
Adam Kane
Nicki McCann
Dr. Farzaneh Sabi