

October 15, 2013

Ben Steffen
Maryland Health Care Commission
4160 Patterson Avenue
Baltimore, MD 21215-2222

RE: Maryland Medical Care Data Base and Data Collection – Draft Regulations

Dear Mr. Steffen:

This letter is intended to provide the Commission feedback regarding the recently released draft regulations on the Maryland Medical Care Data Base and Data Collection (COMAR 10.25.06). MedChi understands that the purpose of these regulations is to expand and enhance MHCC's current database to reflect changes in the health care insurance market and delivery system prompted by implementation of the ACA and anticipated changes that may result from the new Medicare Waiver. The regulations predominantly impact carriers and to that end MedChi's comments are focused on the following issues that are particularly relevant to the physician community.

1. Quarterly Reporting: MedChi supports the Commission's proposal to require quarterly reporting by carriers and other required reporting entities. MedChi believes quarterly reporting will result in more timely and relevant data. It also may result in enhanced carrier accountability for timely claims management given a more frequent requirement to claims data submission.
2. Provider Directory Report: MedChi also supports the requirement for reporting entities to submit a provider directory report. MedChi continues to be concerned about network adequacy and the accuracy of current provider directories. To that end, MedChi would encourage the Commission to include: 1) a requirement for reporting entities to reflect whether a provider is accepting new patients, and 2) specification as to whether a provider delivers services in an inpatient setting, a community-based setting or both. The addition of these two additional data elements will enhance the accuracy and usefulness of the provider directory report as a tool to evaluate network adequacy and the location of service delivery.
3. Non-Fee-For-Service Medical Expenses Report: MedChi is cognizant that in order to create a comprehensive medical care data base, non-fee-for-service expenses must be collected. However, MedChi wishes to register its concern about how such expenses will be defined and reported given the lack of specificity on what is to be considered non-fee-for service expenses. The lack of definition is particularly concerning as discussions about "gain-sharing" and other payment mechanisms is commencing through HSCRC Medicare Waiver application and eventual implementation. MedChi is not opposed to the reporting requirements but urges the Commission to engage stakeholders as it defines what is to be included in this report.

MedChi appreciates the opportunity to provide feedback on the draft regulations and looks forward to its continued work with the Commission as it seeks to enhance and improve the quality and relevancy of the data it collects.

Sincerely,

A handwritten signature in black ink that reads "Gene M. Ransom, III". The signature is written in a cursive style and is enclosed in a thin black rectangular border.

Gene M. Ransom, III
Chief Executive Officer

cc: David Sharp
srinivas.sridhara@maryland.gov