

December 9, 2016

The Honorable Larry Hogan
Governor
State of Maryland
100 State Circle
Annapolis, Maryland 21401

Dear Governor Hogan:

As the largest physician organization in Maryland, MedChi, The Maryland State Medical Society, provides the following comments on the Maryland All-Payer Model Progression Plan (November 18, 2016) (“Plan”). MedChi acknowledges the effort undertaken by the Commission to engage all sectors of the Maryland health care economy in developing this plan and appreciates that many of our concerns have been addressed and incorporated. MedChi believes that, in order to move Maryland forward, the creation of this Plan was the logical next step and, once approved by CMS, will allow all parties to continue their hard work and develop a more detailed implementation strategy.

In short, MedChi supports the Plan and its system-wide health care delivery transformation goals and key strategies, including initiatives to foster accountability, align measures and incentives, encourage and develop payment and delivery approaches, ensure availability of transformation tools, and devote resources to increasing consumer engagement. MedChi understands the need for the All-Payer Model to expand beyond hospitals in order to successfully achieve meaningful system-wide transformation. This transformation will require increased collaboration with physicians, other providers of care, payers, and consumers and will require alignment with other federal and State initiatives.

On this issue, MedChi’s highest concern is aligning and leveraging MACRA requirements with any new programs focusing on aligning physicians with the goals of the Plan. MedChi repetitively expressed concern that the All-Payer Model may prohibit certain programs to be implemented in Maryland, which has been the case for the current oncology care model and the joint replacement model. Consequently, MedChi was very excited when, at our annual meeting, Director Patrick Conway, M.D., shared a vision that many, if not the majority, of Maryland physicians would qualify as participating in an Advanced Payment Model under the All-Payer Model. Therefore, MedChi strongly supports leveraging the risk inherent in the All-Payer Model to assist physicians in achieving MACRA goals. As articulated in the Plan, MedChi supports the initiative to develop MACRA-eligible programs that engage hospital and community-based specialty physicians such as the programs under the Care Redesign amendment and others like the Maryland Comprehensive Primary Care Model. With regard to the Maryland Comprehensive Primary Care Model, while many of the details need to be worked out, MedChi believes that there is broad-range support from a variety of stakeholders for this program.

In addition, MedChi strongly supports the idea that the State explore additional initiatives to include additional physicians and providers and services in care transformation.

In summary, MedChi is fully committed to the All-Payer Model and the initiatives outlined in the Plan. MedChi is pleased to provide further assistance as Maryland moves forward in achieving better care, better health and lower costs.

Sincerely,

A handwritten signature in blue ink that reads "Gene M. Ransom, III". The signature is written in a cursive style with a horizontal line under the "III".

Gene M. Ransom, III
Chief Executive Officer

cc: The Honorable Van Mitchell
Ms. Donna Kinzer