



MARYLAND SOCIETY OF ANESTHESIOLOGISTS

November 25, 2015

Ben Steffen
Executive Director
Maryland Health Care Commission
4201 Patterson Ave.
Baltimore, MD 21215 - 2299

Dear Ben,

We are writing with regard to the MHCC Report: "Maryland Self-Referral Law Provider-Carrier Workgroup Findings and Recommendations". The Maryland Patient Referral Law (MPRL) is very complicated yet affords critical protections for patients and physicians including anesthesiologists.

Therefore it is our recommendation that:

- We should move carefully in this area.
- We maintain that the consensus document needs some revision and an opportunity for further discussion by all stakeholders.
- Maryland's Patient Referral Law (MPRL) should never allow physicians to create profit centers for themselves at the expense of other physicians not similarly situated.
- We do not want to interfere with the work on and exploration of payment models currently underway under existing authority. The Health Services Cost Review Commission (HSCRC) and others have been involved in the development of pilots and new payment models.

We ask that there be further stakeholder deliberation with respect to the findings and recommendations of the report.

Thank you for your attention to these recommendations.

Respectfully,

Amar Setty M.D., President

cc. Ram Peruvemba, M.D.