

Health Care Transformation  
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March 18, 2021

Ms. Eileen Fleck  
Chief, Acute Care Policy and Planning  
Maryland Health Care Commission  
4160 Patterson Avenue  
Baltimore, MD 21215  
Eileen.Fleck@maryland.gov

**Re: Request for Informal Public Comment, draft of State Health Plan for Facilities and Services: General Surgical Services, COMAR 10.24.11**

Dear Ms. Fleck,

Thank you for the opportunity to comment on the draft of State Health Plan for Facilities and Services: General Surgical Services, COMAR 10.24.11. Johns Hopkins Health System (“JHHS”) seeks additional clarification on Standard (3)(d), copied below:

(3) Charity Care and Financial Assistance Policy.

(d) An applicant shall be able to demonstrate that its historic level of charity care or its projected level of charity care is appropriate to the needs of its actual or projected service area population. This demonstration must include an analysis of the socio-economic conditions of the hospital’s actual or projected service area population and a comparison of those conditions with those of Maryland’s overall socio-economic indicators. It may also include a comparative analysis of charity care provision by the applicant hospital and other hospitals in Maryland and an analysis of the social determinants of care affecting use of health care facilities and services and the health status of the actual or projected hospital service area population.

Standard (3)(d) appears to describe three distinct analytical approaches for how an applicant would demonstrate an appropriate level of charity care for a hospital’s service area population. JHHS requests that the MHCC revise Standard (3)(d) so that the Standard more clearly defines what information is required, defines what information is optional, and elaborates on what indicators or statistics the MHCC staff expects to be provided in an applicant’s response.

Sincerely,

Spencer Wildonger  
Director of Health Planning  
Johns Hopkins Health System