

January 14, 2020

Via electronic submission to: Charles.Greenberg@hhsc.state.tx.us

Charles Greenberg
Director of Hospital Finance and Waiver Programs
Texas Health and Human Services Commission
4900 N. Lamar Blvd
Austin, Texas 78751-2316

Re: Proposed Reforms to the Uniform Hospital Rate Increase Program

Dear Mr. Greenberg:

On behalf of the more than 450 hospitals and health systems the Texas Hospital Association represents, thank you for hosting the Dec. 16 stakeholder meeting to discuss the Texas Health and Human Services Commission's proposed changes to the Uniform Hospital Rate Increase Program for fiscal year 2021. Since its inception and subsequent statewide implementation, UHRIP has been an important tool in ensuring access and improving stability for Texas' safety-net hospitals. THA appreciates the time and effort THHSC has invested in implementing and improving this program.

We appreciate many of THHSC's stated goals in its proposal and the transparency with which the agency has approached the policy development process. However, the proposed reforms would fundamentally change many aspects of the program, likely resulting in significant funding shifts across hospitals which are currently not known or understood. THA understands the complexities and resources involved in accurately modeling the impacts of these changes, and the rapid implementation speed at which THHSC needs to proceed to meet the impending deadlines. For all of these reasons, THA remains concerned about THHSC proceeding with the proposed changes at this time.

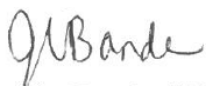
Instead of implementing a major overhaul of UHRIP in FY 2021, THA requests that THHSC move forward only with the lump sum payment for program year 4. If THHSC proceeds with the lump sum payments this year, THA would be happy to facilitate additional stakeholder discussions to determine how this change would be best executed in a way that does not cause significant payment delays or other unintended consequences. In accordance with UHRIP's established goal of stability, regardless of whether THHSC moves forward solely with the lump sum payment change in FY 2021 or delays all of the proposed reforms to FY 2022, THA requests that THHSC continue to work with stakeholders to determine a methodology, through increasing the pool size or other means, to provide stability for providers who are experiencing significant disruption in Medicaid supplemental payments.

Thank you for your continued willingness to work with stakeholders as UHRIP and other supplemental payments are in flux. THA stands ready to assist you in any way as THHSC works through these and other changes.

Mr. Greenberg
January 14, 2020
Page 2 of 2

Should you have any questions or require additional information, please contact me directly at 512/465-1046 or jbanda@tha.org.

Sincerely,

A handwritten signature in dark ink, appearing to read "JBanda".

Jennifer Banda, J.D.
Vice President
Advocacy & Public Policy
Texas Hospital Association