



MARYLAND CITIZENS' HEALTH INITIATIVE

July 20, 2012

Mark Luckner  
Health Enterprise Zone Planning Team  
Maryland Community Health Resources Commission  
45 Calvert Street, Room 336  
Annapolis, MD 21401

**Re: Comments on Health Enterprise Zone (HEZ) Implementation**

Dear Mr. Luckner,

The Maryland Citizens' Health Initiative Education Fund, Inc. (MCHI) is a nonprofit advocacy organization dedicated to expanding access to quality, affordable health care for all Marylanders. MCHI coordinates the Health Care for All! Coalition, the state's largest and most diverse organized group of health care consumers and providers from business, faith, labor, professional and community associations across Maryland.

Our coalition successfully advocated for the increased sales tax on alcoholic beverages which provides new revenue for the Health Enterprise Zones (HEZ) initiative and we appreciate the opportunity to provide comments on the implementation of the program, specifically on the eligibility criteria, selection and benefits. We consider this initiative an exciting opportunity to prepare medically underserved communities across the state for rapid Medicaid enrollment expected in 2014 as a part of the Patient Protection and Affordable Care Act (ACA).

**Eligibility Criteria**

We applaud the administration for maintaining broad eligibility standards to encourage a diverse pool of applicants and for basing eligibility on strong economic and public health indicators.

Applicants may also be encouraged to include an assessment of the number of residents in the proposed zone who earn between 116-138% of the federal poverty level. This estimate will provide a sense of the expected increase in the area's Medicaid population in 2014 and allow for strategic selection of zones in greatest need for extended capacity and services. This can greatly enhance the long-term benefits of the HEZ initiative.

## Selection

We suggest that the commission reconsider the eligibility and selection criteria's heavy reliance on zip codes as it may not be as meaningful a measure in rural regions that experience economic disadvantage and poor health outcomes but have small population densities and are large geographic areas, especially compared to urban zip codes. The commission may also consider that providers in rural areas must draw from large geographic areas to sustain enough volume of patients.

We strongly encourage the commission and Secretary to consider selection of a rural HEZ. We expect that rural areas of the state will collectively experience the greatest coverage gains from the ACA's coverage expansion. Rural areas experience the greatest shortage of healthcare providers in Maryland and patients often have to travel great distances and across county lines for the most basic of care.

## Benefits

The commission describes comprehensive benefits that may attract providers to medically underserved areas. We especially support the incentives to support engagement in the Patient Centered Medical Home pilot program, as this particular component has the potential to both improve the quality and cost of the care patients in HEZ receive.

An additional benefit we are happy to offer as well would be the support of our staff and Health Care for All! Coalition to work with local health improvement coalitions in established HEZs to support outreach and education relating to new consumer protections and coverage opportunities made possible by the ACA. The goal of our outreach will be to increase the rate of health care coverage and reduce uncompensated care costs incurred by providers. We have already conducted promotional campaigns in select regions regarding the dependent coverage expansion, small business tax credits and new consumer protections.

Thank you for the work you do to promote access to quality affordable health care in Maryland. If you or your staff have any questions please do not hesitate to give me a call at (410)235-9000 or email me at [demarco@mdinitiative.org](mailto:demarco@mdinitiative.org).

Sincerely,

Vincent DeMarco  
President  
Maryland Citizens' Health Initiative Education Fund, Inc.