



American Physical Therapy Association of Massachusetts

**Comments to Health Policy Commission  
on the  
Proposed Accountable Care Organization (ACO) Certification Standards**

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As the professional association for physical therapists and physical therapist assistants in the Commonwealth of Massachusetts, the American Physical Therapy Association of Massachusetts (APTAMA) is grateful for the opportunity to comment on these Health Policy Commission (HPC) proposed certification standards. We support the HPC mission to advance a more transparent, accountable, and innovative health care system. We believe these certification standards are critical to ensuring efforts to drive innovation through the ACO's include protection of access for patients and the inclusiveness of qualified health care providers.

Below you will find our comments on these proposed regulations. We look forward to working with the Commission on this and other efforts to improve the overall health of citizens of the Commonwealth through the delivery of the best health care at an affordable cost.

**Comments on Draft Certification Standards**

Table I

Item 4. "Governance structure"

Our concern is two-fold. First, the definition of "meaningful participation" and second, who is considered a specialist provider.

Governance structures must be inclusive, open and support robust discussion. Creating an environment that promotes this type of exchange in a system that is steeped in hierarchy is challenging but achievable if there is a diversity of provider type, the process is inclusive of all those at the table, and proceedings are transparent.

Governance structures must include physical therapists and other rehab professionals who work directly with patients, provide knowledge of prevention and sustainability of populations at risk, as well as offer solutions and interventions consistent with the Commission efforts to contain costs while increasing value to the patient.

8. Risk stratification: Programs that address population health:

Providers who have been tested by the Community, in which they practice, are uniquely positioned to provide programs in population health. Many, including physical therapists in private practice, offer programs for prevention and wellness that allow seniors to remain at home. To target individuals at risk, they need access to data which is collected by the ACOs and presently held as proprietary information. We propose a requirement that community providers have access to this data so that they can be improve access and opportunity to populations at risk in their community. Development of data sharing methodology with community providers will spur collaboration and new learning.

ACO efforts, thus far, have been focused on maintaining care within their system with little improvement in the cost or quality of the care provided. Vertical integration of care has not benefited consumers in reducing costs or driving better outcomes but has allowed a dangerous concentration of market power that threatens community providers. A requirement that sets a minimum percentage of community providers to include physical therapy clinics is essential for patient access, competition in value production and models for improving value.

9. Rehabilitation providers, including community physical therapists in private practice, are essential to patient's ability to function in the least restrictive and preferred environments.

10. Physical Therapist should be included in that list.

15. Physical Therapist should be included in that list

24. Identifying preferred providers.

There must be an open process for physical therapists to compete for inclusion, based on best practices, outcomes data, quality metrics and patient satisfaction. The ACO must provide a method of Electronic Medical Record access through secure portal that is not technically or financially excessive to eliminate participation, as well as a written policy for critical communication around patient care beyond the EMR.

## **Closing**

Thank you again for the opportunity to submit comments on these critical regulations. If you have further questions, please don't hesitate to reach out to APTAMA headquarters at (617) 532-0344 and we'll be sure to put you in touch with our best physical therapists in Massachusetts to answer your questions.