

MOUNT AUBURN CAMBRIDGE INDEPENDENT PRACTICE ASSOCIATION, INC.

MACIPA

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January 28, 2016

Health Policy Commission
Attn: Catherine Harrison
50 Milk Street, 8th Floor
Boston, MA 02109

Dear Ms. Harrison:

Thank you for the opportunity to provide feedback on the proposed Accountable Care Organization (ACO) Certification Standards proposed by the Health Policy Commission (HPC). While we support the HPC's goals we feel it is important to provide feedback on some areas that may be problematic to our organization based on the proposed guidelines.

As we have mentioned in public comments on other policies, we encourage the HPC to use information they have through other HPC/DOI requirements instead of asking organizations to duplicate efforts (e.g., participating provider lists). We feel that many of the HPC's proposed criteria are burdensome and this information should not be made public. The HPC should consider that most organizations that will apply for this voluntary certification have been managing patient populations for many years and the specifics included in the proposed mandatory certification requirements will add burdensome reporting requirements to ACO operations. Although this is a voluntary certification we would like to participate and have the HPC's certification, as proposed the HPC may find that organizations will be unwilling to apply for this voluntary certification.

Below are our key concerns by category in the grid distributed by the HPC.

Legal and governance structures:

MACIPA operates as a single ACO entity and does not have separate legal entities for different lines of alternative payment business. There is a proposed mandatory criterion that the ACO operates as a separate legal entity. We would like the HPC to provide additional clarification on this mandatory requirement. If HPC's intent is that separate legal entities be created for contracts (e.g., Next Generation ACO, Commercial risk) we would strongly encourage the HPC to re-evaluate this criterion.

Throughout this section there is reference to assessing "meaningful participation" for ACO governing body participants. While we have no problems sharing lists of committee members with the HPC, we believe measurement of meaningful participation is out of scope for the HPC as this may interfere with ACO operations. Since the HPC intends to make ACO documentation public this raises concerns with requirements to submit meeting minutes from various committees.

Risk Stratification and population specific interventions:

The proposed criteria require the ACO's participate in a budget-based Medicaid contract by 2017. We believe this requirement should be removed. ACO's operate in different geographies and have different patient volume in both management Medicaid and Mass Health. MACIPA's practices do not have a substantial volume of Medicaid

patients. In addition the criteria for Medicaid alternative payments have not been finalized; therefore it doesn't seem appropriate to have this mandatory requirement.

Reporting only criteria:

There are several requirements in the reporting only criteria that are duplicative of efforts of other HPC/DOI requirements. ACO's will be required to report their adoption rate of APM's, this information is already reports through the Risk Bearing Provider Organization requirements with the Division of Insurance. We urge the HPC to obtain information from other agencies within the Commonwealth before asking Provider Organizations to duplicate reporting efforts. In addition, reporting funds flow and sharing provider participation requirements is problematic. This information doesn't seem relevant to ACO certification and will force ACO's to share propriety information to the ACO's operations. We would urge the HPC to only require ACO's to submit useful information and provide the ACO's with a clear understanding of how each element of information will be used in its evaluation.

We are happy to discuss our comments further with the HPC. Please contact Melissa LeBlanc at 617-259-2119 or at mleblanc@macipa.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Barbara Spivak M.D.", with a small circular mark below the name.

Barbara Spivak, M.D.
President