

April 2, 2014

### **Proposed Criteria for the Patient Centered Medical Home Certification Program**

The Massachusetts Hospital Association (MHA), on behalf of its member hospitals and health systems, appreciates the opportunity to provide comments to the Health Policy Commission (HPC) on its proposed standards for the certification of Patient Centered Medical Homes (PCMH). MHA recognizes the comprehensive review of existing criteria and practices that the HPC staff and commission members have done as they worked to develop the proposed standards. We commend the HPC for developing a demonstration project that will allow for the evaluation of standards, participants and alternative payment methodologies prior to full blown implementation of the program. MHA also has some additional points that we would like the HPC to consider as it moves to formalize the proposed standards.

#### **NCQA certification should be recognized by HPC**

- The process for achieving PCMH certification through NCQA is rigorous, time consuming and expensive for physician practices. Given the similarities between the NCQA and proposed HPC criteria, MHA strongly encourages the HPC to consider a deeming provision that would allow those NCQA certified practices to automatically qualify for state recognition as PCMHs. Any additional state criteria should be voluntary and should add demonstrable value to the goals of the PCMH.

#### **Performance Data**

- Regarding performance data reporting, it will be important to adopt a uniform quality measurement and reporting framework. Ideally there should be agreement on one set of measures to report, track, and provide feedback. The Center for Health Information Analysis (CHIA) is working towards developing the standard quality measure set (SQMS). We would encourage the HPC to work with CHIA and to consider using some of these same measures for reviewing PCMH performance so that practices don't have an additional administrative burden of complying with numerous different measures from payers and from the state.

#### **Role of Payers**

- It is not clear what criteria the payers will be using to actually select practices to participate, what the time frame is for the pilot program, nor is it clear what will be involved in the "enhanced payments." Additional transparency in this area would be welcome as it would help practices to understand the scope of the pilot, allow those

practices that are not selected understand how decisions were made and to determine if they want to get certified at a future date, and assist staff in evaluating the success of the pilot and its applicability to other practices once the pilot is completed.

Thank you for the opportunity to provide feedback. Please contact Karen Granoff at [KGranoff@mhalink.org](mailto:KGranoff@mhalink.org) or 781-262-6035 if you have questions.