Commonwealth of Massachusetts
Executive Office of Health and Human Services
Office of Medicaid
www.mass.gov/masshealth

Acute Inpatient Hospital Bulletin 198

DATE: December 2024

TO: Acute Inpatient Hospitals Participating in MassHealth

FROM: Mike Levine, Assistant Secretary for MassHealth

RE: **Greenhouse Gas Emissions Reporting and Third-Party Validation Requirements**

Overview

This bulletin outlines the requirements set forth by MassHealth for acute hospitals to contract with an external vendor to conduct third-party validation of the acute hospital's greenhouse gas emissions reporting to MassHealth.

MassHealth is dedicated to monitoring greenhouse gas emissions by acute hospitals in Massachusetts to support the development of industry goals to reduce greenhouse gas emissions and advance statewide goals to achieve net neutral carbon emissions by 2050.

Through the Rate Year 2025 Acute Hospital Request for Applications and Contracts (RY25 RFA), MassHealth requires each acute hospital to report on its greenhouse gas emissions and verify reporting through partnership with an approved third party. Specifically, acute hospitals are required to submit an annual report on total Scope 1 and Scope 2 emissions, including onsite fuel combustion, purchased energy and electricity, anesthetic gas, and fleet vehicle gas and diesel consumption.

Acute hospitals must have their annual report on greenhouse gas emissions verified by an independent third party (called a "validator" in this bulletin), subject to MassHealth approval. This bulletin details the standards for validators and the process by which acute hospitals must submit their validator for MassHealth approval.

Background

Under Section 6.G of the RY25 RFA, acute hospitals must report, and attest to the accuracy of its reporting of, Scope 1 and Scope 2 emissions to MassHealth by **June 30, 2025**.

Acute hospitals are also required to verify their reporting through partnership with an approved validator, and must submit their intended validator for MassHealth approval by **January 31, 2025**.

If an acute hospital requires more time to identify a third party for verification, they may submit a request for an extension as described later in this bulletin.

Independent Third-Party Validation

Third-party validation is an independent assessment of the completeness and accuracy of greenhouse gas reporting and its conformance to pre-established greenhouse gas accounting and reporting principles.

Acute hospitals must select a validator that meets all of the following criteria.

- The validator is not employed by or affiliated with the acute hospital or its hospital system, building owner, or property management company;
- The validator actively holds one of the credentials approved by MassHealth as outlined in the table "Credentials Required for Third-Party Verification;"
- The validator has experience or capacity to verify greenhouse gas emission in a healthcare setting; and
- The validator has experience with following, or capacity to follow, standardized protocols for verifying greenhouse gas emissions (including the Greenhouse Gas Protocol, the Climate Registry, or other recognized protocols).

Credentials Required for Third-Party Verification

Profession	Credential	Organization
Architect	Licensed Architect	National Council of Architectural Registration Boards (NCARB)
Architect	Registered Architect (RA)	American Institute of Architects (AIA)
Building Operator	BREEAM USA In-Use Assessor	BREEAM USA
Certified Passive House Consultant	Certified Passive House Consultant (CPHC) Training	Passive House Institute US (PHIUS)
Commissioning Professional	Commissioning Process Management Professional Certification (CPMP)	American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE)
Commissioning Professional	Certified Commissioning Professional (CCP)	Building Commissioning Association (BCA)
Commissioning Professional	Associate Commissioning Professional (ACP)	Building Commissioning Association (BCA)
Commissioning Professional	Certified Building Commissioning Professional (CBCP)	Association of Energy Engineers (AEE)
Commissioning Professional	Existing Building Commissioning Professional (EBCP)	Association of Energy Engineers (AEE)
Commissioning Professional	Certified Commissioning Authority (CxA)	AABC Commissioning Group (ACG)

Profession	Credential	Organization
Commissioning Professional	Qualified Commissioning Process Provider (QCxP)	UW-Madison
Commissioning Professional	Phius Certified Verifier	Passive House Institute US (PHIUS)
Energy Auditor	Building Energy Assessment Professional (BEAP)	American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE)
Energy Auditor	Certified Energy Auditor (CEA)	Association of Energy Engineers (AEE)
Energy Auditor	Building Energy Modeling Professional (BEMP)	American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE)
Energy Auditor	RPA/FMA High Performance Designation (RPA/FMA-HP)	BOMI International
Energy Auditor	Certified Measurement and Verification Professional (CMVP)	Association of Energy Engineers (AEE)
Energy Auditor	LEED Advanced Professional (AP) Building Operations & Maintenance	U.S. Green Building Council (USGBC)
Energy Auditor	SEP Performance Verifier	Association of Energy Engineers (AEE)
Energy Manager	Operations and Performance Management Professional (OPMP)	American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE)
Energy Manager	Certified Energy Manager (CEM)	Association of Energy Engineers (AEE)
Energy Manager	Energy Management Professional (EMP)	Energy Management Association (EMA)
Energy Manager	50001 Certified Practitioner in Energy Management Systems	Association of Energy Engineers (AEE)
Energy Modeler	Phius Certified Consultant	Passive House Institute US (PHIUS)
Engineer	Professional Engineer (PE)	National Society of Professional Engineers (NSPE)
Greenhouse Gas Verification Professional	Greenhouse Gas Validation/Verification according to ISO 14065 standard	ANSI National Accreditation Board (ANAB)

Submission of Acute Hospital Validator Selection

Appendix A to this bulletin is the form that acute hospitals must use to select a validator and request MassHealth approval. Acute hospitals must complete Appendix A and submit it for MassHealth approval by **January 31, 2025**, via email to AcuteHospitalRFA@mass.gov. If an acute hospital requires more time to identify their selected validator, they may submit a formal letter request for an extension of up to one month. Extension requests must be submitted on or before **January 31, 2025**, via email to AcuteHospitalRFA@mass.gov.

Each acute hospital must submit a single Appendix A via email to AcuteHospitalRFA@mass.gov. **Please note**: A single acute hospital enrolled with MassHealth as both acute outpatient and acute inpatient provider types needs to submit only one completed Appendix A.

MassHealth Website

This bulletin is available on the MassHealth Provider Bulletins web page.

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Questions?

- Call MassHealth at (800) 841-2900, TDD/TTY: 711
- Email us at provider@masshealthquestions.com

Appendix A
Acute Hospital Greenhouse Gas Emissions
Independent Third-Party Validator Submission

This form must be completed in accordance with the requirements of Section 6.G of the Rate Year 2025 Acute Hospital Request for Applications, Acute Inpatient Bulletin 198, and Acute Outpatient Bulletin 40. The acute hospital does not need to have an executed contract with the proposed validator to submit Appendix A. The validator is subject to MassHealth approval.

Appendix A must be submitted via email to AcuteHospitalRFA@mass.gov on or before **January 31, 2025**, unless MassHealth has approved an extension for the hospital.

Section 1: Acute Hospital Contact Information

Acute Hospital Name	
Acute Hospital Designee Name	
Acute Hospital Designee Title	
Acute Hospital Designee Email Address	

The acute hospital's designee must be the person responsible for greenhouse gas emissions reporting.

Section 2: Validator Contact Information

Validator Name	
Validator Credentials	
Validator Point of Contact Name	
Validator Point of Contact Email Address	

Section 3: Validator Experience or Capacity Narrative

A. Please provide a short narrative (1-2 paragraphs) explaining the validator's experience with verifying, or capacity to verify, greenhouse gas emissions in a healthcare setting.

Provide Narrative Here:

B. Please provide a short narrative (1-2 paragraphs) explaining the validator's experience with following, or capacity to follow, standardized protocols, such as Greenhouse Gas Protocol, the Climate Registry, or other recognized protocols, for verifying greenhouse gas emissions.

Provide Narrative Here: