# Acute Inpatient Hospital Bulletin 198

Commonwealth of Massachusetts

Executive Office of Health and Human Services

Office of Medicaid

[www.mass.gov/masshealth](https://www.mass.gov/orgs/masshealth)

**DATE:** December 2024

**TO:** Acute Inpatient Hospitals Participating in MassHealth

**FROM:** Mike Levine, Assistant Secretary for MassHealth [signature of Mike Levine]

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](https://www.commbuys.com/bso/external/bidDetail.sdo?docId=BD-25-1039-EHS01-ASHWA-107272&external=true&parentUrl=close) (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)  |
| 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 toAcuteHospitalRFA@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](http://www.mass.gov/masshealth-provider-bulletins) web page.

[Sign up](https://www.mass.gov/forms/email-notifications-for-provider-bulletins-and-transmittal-letters) to receive email alerts when MassHealth issues new bulletins and transmittal letters.

## Questions?

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

[MassHealth on Facebook](https://www.facebook.com/MassHealth1/) [MassHealth on LinkedIn](https://www.linkedin.com/company/masshealth) [MassHealth on X](https://www.twitter.com/MassHealth) [MassHealth on YouTube](https://www.youtube.com/channel/UC1QQ61nTN7LNKkhjrjnYOUg)

## 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](https://www.commbuys.com/bso/external/bidDetail.sdo?docId=BD-25-1039-EHS01-ASHWA-107272&external=true&parentUrl=close), [Acute Inpatient Bulletin 198](https://www.mass.gov/lists/masshealth-provider-bulletins-by-provider-type-a-c#acute-inpatient-hospital-), and [Acute Outpatient Bulletin 40](https://www.mass.gov/lists/masshealth-provider-bulletins-by-provider-type-a-c#acute-outpatient-hospital-). 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**

1. 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:* |

1. 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:* |