



February 8, 2019

By email to HPC-Certification@mass.gov

Mr. David M. Seltz
Executive Director
Health Policy Commission
50 Milk Street, 8th Floor
Boston, MA 02109

RE: Proposed 2019 Accountable Care Organization Certification Standards Request for Public Comment

Dear Mr. Seltz:

Beth Israel Deaconess Care Organization (“BIDCO”) appreciates the Health Policy Commission’s (“HPC”) invitation to provide comments on the Proposed 2019 Accountable Care Organization Certification Standards (the “Proposal”). Overall, we believe that the Proposal reflects a thoughtful approach to building the knowledge base around high-functioning Accountable Care Organizations (“ACOs”).

BIDCO wishes to offer the following comments:

1. While BIDCO appreciates the fact that, with respect to certain data items, HPC proposes to allow an applicant to refer to data submitted to the Registration of Provider Organizations (“RPO”) program, BIDCO believes that in the future the ACO certification process should be better coordinated with the RPO program as a general matter, with respect to such issues as timelines and duplicative reporting. In specific, BIDCO requests that HPC consider creating an optional mechanism whereby ACOs that are also required to register under the RPO program may make a combined filing that satisfies both programs, or by which an ACO that is already registered as a provider organization may make an abbreviated filing for ACO certification.
2. With respect to the Proposed 2019 Supplemental Questions, while we understand that HPC intends to include only “a subset” of the proposed questions and that such questions may differ as to form from what was presented in the Proposal, BIDCO emphasizes that it is important to consider clarity, user-friendliness, and relatedness to the goals of ACO certification in framing the final questions. In particular, the final questions should clearly indicate the manner of response, level of detail, and supporting documentation (if any) that HPC is seeking, with due consideration for the reporting burden such questions may impose upon applicants.

3. With respect to the Proposed ACO Distinction Program, BIDCO believes that, while HPC has emphasized that the Program is voluntary, it remains important for HPC to consider the administrative burden imposed by the Program's requirements. In particular, BIDCO questions whether some of the data designated under "Performance Reporting" in the Proposal could be obtained from other, existing sources. Reporting of total medical expense ("TME") and total cost of care ("TCOC") at the ACO level are already available to HPC from analyses performed by the Center for Health Information and Analysis.

Similarly, BIDCO is concerned that evaluating TME and TCOC will not provide HPC with meaningful, apples-to-apples comparisons between ACOs unless TME and TCOC are adjusted to account for case mix and similar factors.

We continue to appreciate HPC's collaborative approach to preparing the Proposal and the final standards, and we would be happy to discuss these issues further with the HPC.

Sincerely,



Deborah Schoenthaler,
Chief Operating Officer