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*Submitted electronically to [Benjamin.A.Thomas@mass.gov](mailto:Benjamin.A.Thomas@mass.gov)*

March 27, 2020

Health Policy Commission  
50 Milk Street, 8<sup>th</sup> Floor  
Boston, MA 02109

**Re: State Cost Growth Benchmark for Calendar Year 2021**

Dear Commissioners:

Thank you for the opportunity to offer comments as the Health Policy Commission considers adjusting the cost growth benchmark for 2021. The Conference of Boston Teaching Hospitals (COBTH) is an organization of twelve Boston-area teaching hospitals that works to advance policies critical to the core mission of academic medical centers: providing needed, high quality patient care to all, regardless of insurance status or ability to pay; training the next generation of physicians, nurses and allied health professionals; advancing innovation and discovery through biomedical research; and serving our surrounding neighborhoods and communities. Most importantly in our current moment, COBTH's member hospitals are on the front lines of the Commonwealth's -- and indeed the nation's -- COVID-19 response.

Throughout the time that the Health Policy Commission has been setting the cost growth benchmark in recent years, COBTH has supported maintaining the benchmark at 3.1%, while respectfully cautioning the Commission to be mindful of the many factors outside the control of providers, payers, and the Commonwealth that may make meeting the health care cost growth benchmark target difficult. As the Commonwealth undertakes significant efforts to respond effectively to the needs of patients during this COVID-19 pandemic, it is clear that our widescale response will have a substantial impact on health spending in the coming year.

COBTH's member hospitals remain committed to continuing the hard work of reducing health care cost growth and increasing affordability and quality of care, even in times of intense upward pressure on costs and significant uncertainty.

COVID-19, however, is a public health crisis that requires the full attention of the hospitals and our entire health care delivery system, and we do not believe it is possible at this point to offer meaningful comment on the benchmark in the midst of this unprecedented challenge to every resource within our health care delivery system. Hospitals are losing substantial revenue from the unprecedented and widescale cancellation of elective services and the closure of research labs, while incurring substantial additional costs in labor; personal protective equipment and other resources; and in ongoing efforts to build surge capacity.

With respect to the ongoing and rapid deployment of telehealth, we are particularly grateful to the Commission for supporting the expansion access to telehealth services in Massachusetts during this crisis, as it has been a critical lifeline to our patients and a key tool in preventing the spread of this disease and preserving the acute-care capacity of our hospitals.

We are very grateful for the support and groundwork that the Commission has laid on expanding access to telehealth and look forward to working with the Commission to continue to address the issue of health care spending growth, quality and affordability in our Commonwealth.

Sincerely,

A handwritten signature in blue ink that reads "Patricia McMullin". The signature is fluid and cursive, with the first name "Patricia" and last name "McMullin" clearly legible.

Patricia McMullin  
Executive Director  
Conference of Boston Teaching Hospitals