



November 30, 2017

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

Mr. Ray Campbell  
Executive Director  
Center for Health Information and Analysis  
501 Boylston Street  
Boston, MA 02116

**RE: Massachusetts Registration of Provider Organizations Program: Proposed 2018 Updates**

Dear Mr. Seltz and Mr. Campbell:

Thank you for providing Beth Israel Deaconess Care Organization (BIDCO) the opportunity to respond to the Health Policy Commission's (HPC) proposed 2018 updates. BIDCO is a value-based physician and hospital network and an Accountable Care Organization (ACO) made up of more than 2,600 physicians and eight hospitals in Eastern Massachusetts. As a registered Provider Organization in the Massachusetts Registration of Provider Organizations (MA-RPO) program, BIDCO appreciates this opportunity to provide comments and suggestions to the proposed updates for the 2018 submission.

In response to Question 1 (*Does your organization recommend any modifications or instructions to the proposed updates?*), BIDCO respectfully requests eliminating the additional data elements proposed in the Provider Roster, RPO-99A through RPO-99E. BIDCO is a physician and hospital network that does not require its membership to provide advance practice provider (APP) information when enrolling into BIDCO established contracts. BIDCO could adopt enrollment policies and procedures to collect this information from its network membership, but BIDCO is concerned that this is an administrative function that it is not presently contemplated in project work plans for 2018.

Additionally, BIDCO does not receive, request, or require billing information from any of its members. *RPO-99B: Billing Practices* would require BIDCO to request specific billing information for APPs from its entire network. Completing this task places considerable administrative burden on the organization as it would require BIDCO to (1) build the infrastructure to capture and retain this information, (2) create policies and procedures for how the data will be captured and stored, and (3) perform on-going monitoring to ensure the data is accurate and up to date.

Lastly, it is unclear what the underlying purpose is as to why these data elements are being added to the Provider Roster. The potential benefits this information provides to the public or the rationale for why this information is important to drive decision-making has not been clearly defined by the HPC.

It is for these reasons that BIDCO respectfully requests to eliminate the proposed data elements to the Provider Roster, RPO-99A through RPO-99E. BIDCO is a strong proponent of the work the HPC is doing to promote transparency in the Commonwealth, and would like to assist in future data element proposals as they relate to the MA-RPO program.

In response to Question 6 (*Please include any feedback regarding the feasibility of providing data in the summer of 2018*), BIDCO proposes an earlier submission deadline in late spring. This will provide additional flexibility in the summer months to prepare for the fall Cost Trends Hearing. BIDCO would also support a summer submission deadline as opposed to a fall one for similar reasons as previously stated.

Thank you for giving us the opportunity to provide comments. If you have any questions, please do not hesitate to contact Cecilia Ugarte Baldwin, Director of Public Payer Programs and Policy, at 617-754-1098.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey R. Hulburt", with a long, sweeping horizontal line extending to the right.

Jeffrey R. Hulburt  
President & Chief Executive Officer