



January 29, 2016

Health Policy Commission
ATTN: Catherine Harrison
50 Milk Street, 8th floor
Boston, MA 02109

RE: ACO Proposed Certification Framework

Dear Commissioners:

Fresenius Medical Care is the largest provider of renal dialysis products and services in the U.S., providing dialysis services to an estimated 165,000 individuals with ESRD at over 2,100 dialysis facilities. The North America Corporate headquarters for Fresenius Medical Care is located in Waltham, MA, and approximately 3,060 (45%) of the 6,800 residents in Massachusetts suffering with ESRD receive dialysis treatments at one of FMCNA's 32 dialysis facilities treating 45% of end stage renal disease (ESRD) patients throughout the Commonwealth. As a large and experienced provider of renal-related health care service, Fresenius Medical Care has the expertise and scale to transform what is currently a dialysis-focused and sometimes fragmented patchwork of health care for kidney patients in the Commonwealth into a patient-centric and coordinated renal care delivery system that integrates a broader spectrum of necessary healthcare services.

The Health Policy Commission's (HPC) own 2014 Cost Trends Report data confirms that this patient population is one of the smallest chronic care, co-morbidity groups, yet it is among the most costly in Massachusetts. What is unique about this patient population is that Medicare and Medicaid are the predominant payers of their medical care. Fresenius Medical Care appreciates that MassHealth is undergoing discussions with the Center for Medicare and Medicaid Services to explore a waiver allowing alternative payment methodologies and will continue to engage with them in relation to a Renal Accountable Care Organization (ACO) here.

We have reviewed the HPC's proposed ACO certification standards. Thank you for making the objectives and pathways for achieving ACO certification clear. It is necessary to acknowledge current Medicare ACO programs requirements while understanding that not all Medicare programs currently afford an opportunity to serve all patients. For example, Medicare's ESRD Seamless Care Organization (ESCO) program is designed to address the recognized significant needs of the ESRD population, but Massachusetts is unable to meet those eligibility requirements. Fresenius Medical Care is able to meet the proposed certification standards and welcomes the opportunity to establish a partnership that can serve this patient population by improving quality metrics, preventing avoidable utilization and admissions while bending the cost curve in Massachusetts.

Thank you,

A handwritten signature in black ink, appearing to read "Cathleen O'Keefe", written over a horizontal line.

Cathleen O'Keefe
Vice President Regulatory and Government Affairs