October 28, 2024

**Re: Mass General Brigham response to 105 CMR 130.000**

In response to the proposed amendments to 105 CMR 130.000 regarding the statewide criteria for the designation of hospitals in a tiered stroke system, Mass General Brigham (MGB) would like to express its support for these important initiatives.

Massachusetts General Hospital was the first institution in Massachusetts to obtain certification by The Joint Commission as a Comprehensive Stroke Center, reflecting our dedication to high-quality stroke care. Multiple hospitals across Mass General Brigham are preparing for certification by The Joint Commission at levels commensurate with their local practice. However, the preparation for such certifications is both resource-intensive and time-consuming. The Joint Commission recommends a lead time of 8 to 12 months to adequately prepare for certification.

In light of these challenges, MGB advocates for an extension of the July 1, 2025 certification deadline for hospitals seeking certification by The Joint Commission as Primary Stroke Centers or above. This extension is essential to ensure that all facilities can meet the necessary certification standards without compromising patient care.

We urge you to consider this extension to support Massachusetts hospitals in their ongoing efforts to implement effective and high quality stroke systems of care.

Thank you for your attention to this critical matter.

Sincerely,



**Rachel C. Sisodia, MD**

Chief Quality Officer, Mass General Brigham

Physician, Division of Gynecologic Oncology, Massachusetts General Hospital

Associate Professor, Harvard Medical School