



The Commonwealth of Massachusetts
HEALTH POLICY COMMISSION
50 MILK STREET, 8TH FLOOR
BOSTON, MASSACHUSETTS 02109
(617) 979-1400

STUART H. ALTMAN
CHAIR

DAVID M. SELTZ
EXECUTIVE DIRECTOR

HEALTH POLICY COMMISSION BULLETIN HPC-OPP-2017-03

To: Risk-Bearing Provider Organizations, Provider Organizations Seeking Certification as Risk-Bearing Provider Organizations, Provider Organizations Seeking Certification as Accountable Care Organizations, and Other Interested Parties

From: Steven Belec, Director, Office of Patient Protection

Re: Extended Reporting Schedule for Appeals Process for Patients of Risk Bearing Provider Organizations pursuant to Office of Patient Protection Interim Guidance on M.G.L. c. 176O, §24

Date: November 3, 2017

**Extended Reporting Schedule for Appeals Process for
Patients of Risk-Bearing Provider Organizations**

In 2016, the Office of Patient Protection released Interim Guidance to advise provider organizations that are certified as risk-bearing provider organizations (RBPOs) by the Division of Insurance of the legal requirement to establish an appeals process to address patient complaints and to provide guidance on minimum requirements of such a process as required by M.G.L. c. 176O, §24. (Bulletins HPC-OPP-2016-01 and HPC-OPP-2016-02)

The Interim Guidance required RBPOs to record patient complaints from October 1, 2016 through March 31, 2017, and HPC Bulletin HPC-OPP-2017-02 required continued reporting through September 30, 2017. The Office of Patient Protection is extending the reporting schedule until such time as final reporting requirements are codified in a final regulation. The Commission will continue to consider such reports in the development of a regulation regarding internal appeals and external review processes pursuant to M.G.L. c. 176O, §24. The reporting schedule is as follows:

The next report shall be due on January 16, 2018 for complaints received during the period of October 1, 2017 through December 31, 2017. The following report shall be due on April 17, 2018 for complaints received during the period of January 1, 2018 through March 31, 2018. Subsequent reports shall be due on the third Monday following each quarterly reporting period.

If you have questions about this bulletin or compliance with Health Policy Commission Interim Guidance, please contact Steven Belec, Director of the Office of Patient Protection, at Steven.M.Belec@state.ma.us or 617-979-1413.