

Instructions

Before completing this form, please refer to the PIP General Instructions.

The Executive Director may grant an extension of time, up to 45 days. Any extension of more than 45 days shall be granted by vote of the Board. The Executive Director or Commission may grant an extension for a period of time less than the period requested.

Narrative Responses: Provide a concise but comprehensive response to the below question (~ 500 words). Your responses must provide sufficient detail for the reader to understand the justification for the request. Your narrative responses will be posted publicly and should not contain nonpublic information.

Attachments: You may provide any information and documentation necessary to support Your request as attachments. Nonpublic clinical, financial, strategic or operational information You want the HPC to keep confidential pursuant to 958 CMR 10.14 should be included only in attachments and must be clearly identified as confidential. You may submit numerical and tabular data as Microsoft Excel files.

Contact Information

PIP Entity Name: 3/14/2022

Federal Tax ID #: 04-3230035

Business Address 1: Mass General Brigham

Business Address 2: 399 Revolution Drive

City, State, Zip: Somerville, MA 02145

Business Website: www.massgeneralbrigham.org

Contact Person Information

Name: Christopher Philbin

Salutation (Mr., Ms., Dr., etc.): Mr. Title: Vice President, Government Affairs

Phone, Ext.: 857-282-5151

Email: cphilbin@partners.org

I. Extension Request

Date of Extension Request Filing: 3/14/2022

Date currently required to submit proposed
Performance Improvement Plan: 3/14/2022

Requested submission deadline for proposed
Performance Improvement Plan: 5/16/2022

II. Justification for Request

Provide the reasons that the current deadline for filing a proposal Performance Improvement Plan should be extended to the requested submission deadline.

Attachments: Provide data and evidence to support Your narrative response.

Pursuant to 958 CMR 10.06, Mass General Brigham (MGB) respectfully requests an extension of approximately 60-days for filing its proposed Performance Improvement Plan (PIP).

MGB is committed to making health care more affordable for our patients and residents of the Commonwealth, and looks forward to working collaboratively with the Health Policy Commission (HPC) to develop and implement a PIP that demonstrates our commitment in this regard. The PIP process affords us a unique opportunity to build upon the strategies that we have successfully deployed over many years to address costs and ensure that patients receive the highest quality of care, including investing in our population health management capabilities as well as taking on increasing levels of risk in payment arrangements with commercial insurers, Medicare and Medicaid. We share a common interest with the HPC that this process ultimately serves to further advance these goals.

Based on the preliminary discussions we have had with HPC staff, it is our understanding that our PIP proposal should not only address the total medical expense associated with MGB's patient panel, but the HPC also expects us to address total health care expenditures on a statewide basis as well. While we are prepared to take on the challenge, that is a complicated endeavor that will require additional data analysis and discussion with the HPC in order to result in viable, meaningful solutions, some of which may be beyond our control.

We appreciate your commitment to providing us with additional utilization data to help us better understand where we are outliers relative to other providers in the market, and assist us in designing interventions that will improve our performance. We also hope to have additional conversations with you in the coming weeks in order to fine-tune our PIP proposal and ensure that it reflects the HPC's input to the greatest extent possible.

Furthermore, we are awaiting action by the Public Health Commission (PHC) on our three pending Determination of Need applications. Our proposal to shift care to less-expensive community settings is fundamental to our overall strategy for reducing costs, and will benefit the 227,000 patients who live in and around the three proposed integrated care sites by improving both access and convenience. We recognize that the HPC has expressed concerns in its filed comments regarding our ambulatory expansion, notwithstanding the findings of the independent cost analysis that was commissioned by the Department of Public Health (DPH), which concluded that they were consistent with the Commonwealth health care cost-containment goals. Nonetheless, we hope to be able to address the HPC's concerns through the PIP process, and the extension we are seeking will have the added benefit of giving us all time to consider the DPH staff report(s) on our pending applications and PHC's deliberations, prior to finalizing MGB's PIP proposal.

In closing, we fully support the HPC's expressed desire to avoid a protracted PIP process involving multiple submissions and review by the Board. To that end, we believe that the

requested extension will help us collectively avoid such a situation and allow us the time necessary to get it right in the first instance.

Thank you for your consideration.

Certification

By typing my name below, I certify that:

1. I have read 958 CMR 10.00: *Performance Improvement Plans* and the General Instructions.
2. I have read the Request for Extension and any attachments and certify that the information contained therein is accurate and true.

Certified on the 14 day of March 20 22 under the pains and penalties of perjury.

Contact Person Name: Christopher Philbin

Contact Person Title: Vice President, Government Affairs