

February 8, 2019

By e-mail to HPC-Certification@mass.gov

Mr. David Seltz
Executive Director
Health Policy Commission
50 Milk Street, 8th Floor
Boston, MA 02109

Re: Request for Public Comment - Proposed 2019 Accountable Care Organization Certification Standards

Dear Director Seltz:

Lahey Health System, Inc. (“Lahey”) appreciates the opportunity to comment on the Proposed 2019 Accountable Care Organization Certification Standards. Lahey shares and supports the Health Policy Commission’s (“HPC”) vision of generating a robust evidence base to further inform Accountable Care Organization (“ACO”) best practices and to help stakeholders achieve care delivery and cost improvements. While we are encouraged to participate in the program, we strongly urge the HPC to be mindful of the administrative resources that are required to process and develop certification applications. As a general, overarching comment, any additional criteria and documentation requests for 2019 should be structured in a manner that minimizes the administrative burden of participating ACOs.

Assessment Criteria

Lahey suggests that the HPC prepopulate information and documentation from the initial application in the portal, so that an applicant only needs to review and update such information and documentation as is applicable.

Lahey also recognizes that HPC ACO certification is a necessary condition for participation in the MassHealth ACO program. Therefore, Lahey suggests that the HPC notify and enable the applicant to resolve or cure any adverse determinations before a final certification decision is issued.

Proposed 2019 Supplemental Questions.

Lahey believes that all questions under both sections of the supplemental questions are reasonable, and are in furtherance of the stated programmatic goals. The HPC should be mindful that certain functions (i.e. incorporating recovery coaches into population health programs) may be implemented disparately across component ACOs. In many cases, these functions are tailored to address the unique needs and characteristics of each component ACO’s patient population, are

resource dependent, and should not be interpreted to mean that any such function is not relevant to or is less important to the operations and performance of other component ACOs.

The HPC should also ensure that the added administrative efforts of responding to the supplemental questions have added and direct benefits for the applicant ACO. Such benefits could include the sharing of best practices, roundtable discussions, webinars, and other educational platforms that allow ACOs to learn from each other and leverage the evidence base to achieve improvements in quality, cost, and access. These types of engagements would support the HPC's role as a convener and attach a direct benefit to the applicant's reporting of the supplemental information.

Confidentiality of Proposed 2019 ACO Certification Data

Lahey supports the HPC's commitment to the nondisclosure of any non-public information and documents without the applicant's consent.

Proposed ACO Distinction Program

Lahey understands the intent of a distinction program but needs more information and clarification as to how the performance measures would be designed and implemented, and how "statistically significant improvements" would be defined and calculated. Moreover, the description does not address whether distinction status would be measured against other ACOs or against an ACO's individual two year performance. Lahey is also concerned that higher performing ACOs would be disadvantaged because any statistical improvement could appear negligible if its existing performance is already high. Lahey suggests that HPC convene stakeholders to discuss the distinction program prior to implementing it as part of the 2019 Certification Standards.

Thank you for the opportunity to provide comments. Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,



Leslie Sebba, MD
President & Chief Medical Officer
Lahey Clinical Performance Network

cc: Catherine Harrison