



February 7, 2019

Submitted Electronically

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

**Re: Proposed Updates to the 2019 ACO Certification Requirements**

Dear Executive Director Seltz:

Steward Health Care System LLC is a fully integrated, physician-led national health care services organization committed to providing the highest quality of care in the most cost-efficient manner in the communities where our patients live. Steward – the largest privately held health care company in the U.S. – owns and operates 34 hospital campuses across nine states, serves over 1,000 distinct communities and employs approximately 40,000 health care professionals. As an HPC-certified ACO, Steward is one of the largest community-based accountable care organizations in Massachusetts, encompassing ten hospital campuses and over 2,500 physicians and specialists, as well as nurses, home health, behavioral health and allied services professionals.

We understand the HPC’s desire to collect and compile information on ACOs in order to study best practices and we appreciate the opportunity to respond to the HPC’s proposed updates to the 2019 ACO Certification requirements.

**Risk Contract Information – Financial Terms**

Although we can understand the interest and rationale behind collecting information on the financial terms of ACOs’ risk contracts, such information is proprietary and confidential. The terms of our commercial contracts are negotiated between private entities and contain strategically sensitive information. Furthermore, we do not believe that the collection and degree of information being requested by the HPC will further its program goals. Rather than focusing on process measures or confidential contractual details, we encourage the HPC to move the ACO Certification program to be outcomes or performance-focused.

We appreciate and support the HPC’s efforts in seeking stakeholder feedback regarding the proposed updates to the 2019 ACO Certification requirements. We look forward to working with

you to refine these requirements to ensure that the ACO Certification process remains both mission-driven and practical for providers.

Sincerely,



Douglas A. Costa  
President, Population Health MSO  
Steward Health Care Network