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Massachusetts Registration of Provider Organizations (MA-RPO) Program
Proposed 2026 Updates
Released for Public Comment: September 9, 2026

Provider Organizations that meet certain thresholds are required to submit an Annual Filing to the Massachusetts Registration of Provider Organizations (MA-RPO) Program, a joint program managed by the Health Policy Commission (HPC) and the Center for Health Information and Analysis (CHIA). Under the MA-RPO Program, a Provider Organization submits an Annual Filing to the Commonwealth which satisfies its obligations under both the M.G.L. c. 6D, § 11 and M.G.L. c. 12C, § 9.

Chapter 343 of the Acts of 2024 made several important updates to the MA-RPO Program that expand the scope of information collected, including to increase state oversight of private equity, real estate investment trusts, and management services organizations in health care. In response to these statutory changes, the MA-RPO program is proposing to update the reporting requirements for the 2026 data collection cycle. The HPC and CHIA will continue to phase in the statutorily required data elements over time.

For the 2026 filing, the MA-RPO Program is proposing to make the following updates:

1. Updating the requirement to report information on Management Services Organizations (MSO) and Real Estate Investment Trusts (REIT); and
2. Updating and clarifying the existing Significant Equity Investors (SEI) reporting requirements, including adding new reporting requirements for Provider Organizations that have a reportable Category I SEI (i.e., a private equity investor).

To streamline the review and public comment process, the MA-RPO Program is releasing the proposed additions in this document, rather than the full text of the proposed 2026 Data Submission Manual (DSM). For the full text of the 2025 DSM, please see the program website. The MA-RPO Program does not anticipate substantive changes to the 2026 filing requirements aside from those described below.

The MA-RPO Program values the opportunity to receive feedback on its proposed requirements. Provider Organizations are encouraged to share these proposed updates with the departments within their organizations that are responsible for providing the data (e.g., finance, legal, etc.). Organizations or individuals who would like to provide comments on the proposed requirements should send written feedback to HPC-RPO@mass.gov on or before **Thursday, September 24, 2026.** Questions about the proposed requirements can be sent to Liz Reidy, Associate Director, at Elizabeth.Reidy@mass.gov.

The final 2026 DSM will be released after the MA-RPO Program has reviewed and incorporated stakeholder feedback on the new data elements, as appropriate.

MASSACHUSETTS
HEALTH POLICY COMMISSION

CHIA.
center for health information and analysis

Proposed Modifications to the MA-RPO 2026 Reporting Requirements

1. Updating the requirement to report information on Management Services Organizations (MSOs) and Real Estate Investment Trusts (REITs)

In 2025, the MA-RPO Program collected identifying information about Provider Organizations' relationships with certain MSOs and REITs. To avoid duplicative data requests, in conjunction with updated reporting requirements from CHIA as part of the hospital and health system Affiliated Entity data submitted under 957 CMR 9.00, the MA-RPO Program is proposing to remove this requirement from the 2026 MA-RPO filing.

2. Updating and clarifying the existing Significant Equity Investors (SEI) reporting requirements, including adding new reporting requirements for Provider Organizations that have a reportable Category I SEI (i.e., a private equity investor).

The MA-RPO Program proposes to restructure the existing SEI file into two parts:

- Part I will be completed by all Provider Organizations with a reportable SEI (Category I or II).
- Part II will be completed by all Provider Organizations with a reportable SEI (Category I only) and that are not required to submit hospital and health system Affiliated Entity data to CHIA pursuant to 957 CMR 9.00.

The rest of this section describes updates and additions relevant to each section of the SEI file.

Part I

To improve data standardization, the MA-RPO Program proposes the following updated guidance on reportable SEIs:

- Provider Organizations must report as Category I SEIs both the PE Company(ies) and each associated fund with a financial interest in the Provider Organization or in one of its corporate affiliates.

- In RPO-212, the Provider Organization identifies which of its corporate affiliates has a relationship with an SEI. This question allows the Provider Organization to differentiate between an investment in the entire Provider Organization and an investment made in only a part of the Provider Organization's business (e.g., a joint venture). The SEI relationship should be reported at the uppermost corporate level to which the investment applies, as further explained below.

  SEI Relationships That Pertain to the Entire Provider Organization

  If an SEI invests in an entire Provider Organization, the Provider Organization will report the relationship as occurring between the SEI and the Uppermost Corporate Parent. The Provider Organization will list its Uppermost Corporate Parent in RPO-212. The Provider Organization will list the SEI in RPO-214. If multiple SEIs are investing in the Provider Organization, report each on a separate row, repeating the name of the Uppermost Corporate Parent in RPO-212.

  SEI Relationships That Pertain to Part of the Provider Organization

  If an SEI invests in only part of the Provider Organization, the Provider Organization will report the corporate affiliate in which the SEI invests in RPO-212. The Provider Organization will list the

SEI in RPO-214. If multiple SEIs are investing in the same corporate affiliate, report each on a separate row, repeating the name of the corporate affiliate in RPO-212.

If the same SEI has multiple, separate investments in two or more corporate affiliates within the same Provider Organization (e.g., multiple, separate joint venture investments), the Provider Organization will report each corporate affiliate in which the SEI invests on a separate row in RPO-212, repeating the name of the SEI in RPO-214.

As part of the 2026 filing, Provider Organizations that have a relationship with an SEI will be required to complete the same fields as they completed in 2025 (see RPO-212 through RPO-218 in the 2025 Data Submission Manual), with the following additions:

- **Management Company Name(s):** If the SEI reported in RPO-214 is a private equity fund, report the name of the Management Company(ies) associated with the fund.
- **Management Company EIN(s):** If the SEI reported in RPO-214 is a private equity fund, report the EIN of the Management Company(ies) associated with the fund.
- **General Partner Name(s):** If the SEI reported in RPO-214 is a private equity fund, report the name of the General Partner(s) associated with the fund.
- **General Partner EIN(s):** If the SEI reported in RPO-214 is a private equity fund, report the EIN of the General Partner(s) associated with the fund, unless the General Partner is an individual. Do not submit individual social security numbers to the MA-RPO Program.

Part II

The MA-RPO Program proposes to add the following reporting guidance and definition.

The data elements in Part II of the SEI file relate to Provider Organizations' relationships with category I SEIs, including the SEIs' subsidiaries and parents, if any.

If the entire Provider Organization has private equity investment, or if only one corporate affiliate within the Provider Organization has private equity investment, Provider Organizations will complete the information below once. If the Provider Organization has multiple corporate affiliates with distinct private equity investors, the Provider Organization will complete this information for each corporate affiliate with private equity investment.

Unless a question asks specifically about the Provider Organization's most recent complete fiscal year, responses must be accurate as of January 1, 2026. For questions that ask about the most recent complete fiscal year, the Provider Organization must report for the same fiscal year reflected in the Financial Statements file.

Distributions: Payouts of the Provider Organization's profits, assets, or other value that are shared with investors, owners, or other affiliates of the SEI, regardless of how characterized. Distributions include those financed by dividend recapitalization.

The MA-RPO Program proposes to add the following data elements:

- **Total PE Liabilities**: Enter the amount of the Provider Organization's Total Liabilities (as reported in RPO-168) in the most recent complete fiscal year that is owed to a private equity firm (regardless of whether the private equity firm is a reportable SEI), if any.

- **Dividend Recapitalizations:** Do the terms of any of the Provider Organization's loan agreements allow for dividend recapitalization?

- **Total MSO, SEI, or PE Payments Made in the Most Recent Fiscal Year:** Enter the total amount paid in the most recent fiscal year to a corporately affiliated MSO, a Category I SEI (including any subsidiaries, parent entities, or related parties), or any private equity firm (regardless of whether the private equity firm is a reportable SEI).

    - **Loan/Debt Payments:** Enter the portion of the total payments reported that are loan/debt obligation payments.
    - **Distributions:** Enter the portion of the total payments reported that are Distributions.
    - **Fees:** Enter the portion of the total payments that are fees (e.g., management fees, monitoring fees, transaction fees, consulting fees, etc.).
    - **Rent and/or Realty Payments:** Enter the portion of the total payments reported that are for rent and/or realty payments.
    - **Other Payments or Fees:** Enter the portion of total payments not otherwise categorized as loan/debt payments, Distributions, fees, or rent/realty payments.

- **Payments in the Provider Organization's AFS:** Enter the line item(s) in which the payments reported above are reported in the Provider Organization's audited financial statements.

- **MSO Services:** Select all services provided by the Provider Organization's corporately affiliated MSO(s) under the terms of the management services agreement(s).

    - Revenue cycle management (e.g., billing and collection, coding, claims submission, etc.)
    - Human resources (e.g., payroll, benefits)
    - Purchasing
    - Patient scheduling
    - Payer contracting
    - Network development (e.g., ACO network, Integrated Delivery Network development)
    - Other, Describe

- **Agreements and Authorities:** Select each agreement or authority that exists between any of the Provider Organization's corporate affiliates that are direct providers of patient care services and another entity (e.g., a corporately affiliated MSO, Category I SEI).

    - Continuity agreements (e.g., restricted stock transfer agreements) with a member of the provider's executive leadership.
    - Non-compete agreements for the staff of the provider.
    - Authority of another entity to appoint one or more members of the governing board(s) of the provider(s).
    - Authority of another entity to direct or approve the budget of the provider(s).
    - Authority of another entity to direct or approve the strategic plan of the provider(s).

- Authority of another entity to direct or approve the assumption of new debt or loans for the provider(s).
- Authority of another entity to direct or approve new expenditures or investments for the provider(s).
- Authority of another entity to direct or approve the sale of property, plant, or equipment of the provider(s).
- Authority of another entity to direct or approve the sale, merger, or other change-of-control transaction involving the provider(s) or any of its corporate affiliates.
- Authority of another entity to direct the hiring or firing of the clinical staff of the provider(s).
- Authority of another entity to direct the hiring or firing of the non-clinical staff of the provider(s).
- Authority of another entity to direct or approve the reduction, elimination, or addition of clinical service lines of the provider(s).

- **Recent Activities:** Select each activity that occurred at any of the Provider Organization's reportable corporate affiliates over the course of the Provider Organization's most recent fiscal year.
  - The FTE count of clinical staff of any reportable corporate affiliate decreased by more than 10% from the beginning to the end of the most recent fiscal year.
  - The FTE count of non-clinical staff of any reportable corporate affiliate decreased by more than 10% from the beginning to the end of the most recent fiscal year.
  - A reportable corporate affiliate sold real property.
  - A reportable corporate affiliate declared bankruptcy.
  - A reportable corporate affiliate received a notice of default or covenant violation under any loan agreement, line of credit, lease, sale-leaseback arrangement, or any other agreement that creates a repayment or performance obligation.
  - A reportable corporate affiliate reduced or eliminated clinical services.
  - None of the above