



September 19, 2018

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

re: **HPC Study on Ballot Question 1, *Nurse-Patient Assignment Limits Initiative***

Dear Executive Director Seltz:

On behalf of the Massachusetts Association of Health Plans (“MAHP”), which represents 16 health plans that provide coverage to approximately 2.6 million Massachusetts residents, I am writing to request that the Health Policy Commission (“HPC”) conduct an independent study on the impact of Ballot Question 1, *Nurse-Patient Assignment Limits Initiative* (“the Question”), which will appear on the November statewide ballot. The Question, if passed, would establish specific patient to nurse staffing ratios for Massachusetts hospitals.

The MAHP Board of Directors met recently to discuss the nurse staffing ballot question and evaluated recent cost analyses that have been presented by both proponents and opponents of the Question. The MAHP Board recognizes that this is an issue of important significance that could result in increases in premiums for employers and consumers, in varying amounts based on different studies. Equally important is the impact nurse staffing ratios would have on quality of care for patients, and here too proponents and opponents present competing analyses.

It is our belief that if the higher cost estimates put forward are close to accurate, the Question could significantly hamper our state’s efforts to control cost and would threaten our state’s ability to meet the health care cost benchmark. MAHP has always been committed to improving quality of care for our members and containing costs, but our efforts have re-doubled since the passage of our state’s universal access law and individual mandate. We know that it is imperative that we focus on bending the health care cost trend so that our state’s residents can remain insured. Contradictory findings from proponents and opponents of this Question make it hard for our organization to truly evaluate this proposal for its net impact on costs and quality improvement.

We believe that on behalf of our employer customers and the members we serve, it is critical we have a credible, independent analysis that evaluates the true impact of the Question as it relates to costs, quality of care, access to care and the overall patient experience. Since no robust independent study has emerged in Massachusetts to provide these details, it is our belief that the HPC is in the best position to provide this analysis in a fair and thorough way.

Given the importance of this issue, it would be very helpful if the Commission's analysis could be completed in advance of the Annual Cost Trends Hearings, scheduled for October 16th and 17th of this year. As part of your analysis, we would ask that you estimate what, if any, increase in spending would result from passage of the Question and the likely per member per month impact. Also, we would like to understand how increases in better quality of care might offset this spending.

On behalf of our board and the employers and members we serve, MAHP respectfully requests that the HPC look positively upon our request, conduct this analysis and release it prior to the cost hearings so that all stakeholders can benefit from your findings.

We appreciate the work you, the board and your staff do every day to rein in health care spending and we are hopeful you will agree to take up a study of this important public policy matter. Please feel free to contact me directly if you have questions.

Sincerely,



Lora M. Pellegrini
President and CEO
Massachusetts Association of Health Plans (MAHP)

cc:

Stuart Altman, Ph.D., Chairman, Health Policy Commission
Wendy Everett, Sc.D., President of NEHI, Vice Chair, Health Policy Commission
Michael J. Heffernan, Secretary, Executive Office for Administration and Finance
Marylou Sudders, M.S.W., Secretary, Executive Office of Health and Human Services
John Christian Kryder, M.D., Executive Partner, Flare Capital
Don Berwick, MD, MPP, President Emeritus and Senior Fellow, Institute for Healthcare Improvement
Martin Cohen, President and CEO, MetroWest Health Foundation
David Cutler, Ph.D., Otto Eckstein Professor of Applied Economics, Department of Economics, Harvard University
Richard C. Lord, President and CEO, Associated Industries of Massachusetts
Tim Foley, Executive Vice President, 1199SEIU
Ron Mastrogiovanni, President and CEO, HealthView Services