MassHealth
All Provider Bulletin 345
June 2022

TO: All Providers Participating in MassHealth

FROM: Amanda Cassel Kraft, Assistant Secretary for MassHealth

RE: **Robotics Processing Automation (RPA) Policy**

Background

Currently some MassHealth providers, relationship entities, and business partners (hereafter referred to as "organizations") use Robotics Processing Automation (RPA) tools to submit and retrieve information on the Medicaid Management Information System (MMIS) Provider Online Service Center (POSC). MassHealth understands that the use of these type of tools (also known as bots) reduces the administrative burden of manual data entry and generally supports such administrative reductions. However, MassHealth needs to know which RPA tools are being used by organizations and how those tools are interacting with the POSC. MassHealth must evaluate and approve such use to limit exposure to any adverse impacts to the system.

Effective July 1, 2022, MassHealth will require organizations that use RPA tools/bots on the POSC or intend to use RPA tools/bots in the future to register any/all bots with MassHealth by submitting a request for approval. This will enable MassHealth to identify, document, and manage RPA utilization on the POSC.

Organizations may begin to submit registration requests to MassHealth for evaluation on or after July 1, 2022.

Overview of the RPA Policy

Organizations that currently use RPA tools on the POSC or intend to use RPA tools/bots on the POSC on or after July 1, 2022, must adhere to the following RPA Policy requirements:

- Submit a registration request (two stages and two forms) to MassHealth to use RPA tools/bots on the POSC. (See the **How to Request RPA Approval** section in this bulletin.) Upon approval, MassHealth will issue an RPA User ID for each transaction the bot will perform.
- Organizations that are actively using an RPA tool/bot within the POSC on or before July 1, 2022, can be grandfathered into the RPA Policy. These organizations will only be required to complete the RPA Stage II Registration Form – Grandfathered Entities.

- All organizations must sign the MassHealth RPA Agreement to document that the organization will comply with the RPA Policy requirements, which include, but are not limited to the following.
  - The organization is solely responsible for the actions of the bot within the POSC.
  - The bot will perform only those functions that the bot has been approved to perform with in the POSC, pursuant to the approved registration form(s).
  - The bot will perform a single, sequential function at a time.
  - The bot will not submit duplicate transactions.
  - The bot will be programmed to terminate failed login attempt activity and notify the user immediately.
  - The User ID assigned to the bot will not be used for any other activity within the POSC.
  - RPA Tool upgrades will be implemented promptly.
  - The organization must adhere to all MassHealth RPA Policy requirements.

- MassHealth will monitor all RPA tool/bot use within the POSC. Any organization that does not comply with the RPA Policy may be contacted by MassHealth to resolve compliance issues. Any organization that violates the RPA Policy will be subject to remedial actions or sanctions as determined appropriate by MassHealth, which may include but are not limited to termination of the ability to use RPA tools/bots on the POSC. Organizations will be required to validate bot utilization annually.

How to Request RPA Approval

Organizations may request RPA approval by completing the following steps.

- **Stage I Registration**. Submit a MassHealth [RPA Stage I Registration Form](#) to identify, at a minimum, the type of transactions that will be performed, the RPA tool the organization will use, and the targeted implementation timeframes. Upon approval, MassHealth will issue a Stage I approval number. Organizations must submit the Stage I approval number on the Stage II registration request.

- **Stage II Registration**. Upon completion of RPA bot testing, organizations may submit a MassHealth [RPA Stage II Registration Form](#) seeking formal approval to implement the transactions previously approved in the Stage I request. Organizations are required to submit a copy of the systems design documentation that outlines how the bot will function in the POSC, as well as relevant test scenarios. Additionally, organizations must submit a copy of the signed MassHealth [RPA Agreement](#), noting that the organization will comply with the [RPA Policy](#) requirements.

- Organizations that can validate that the RPA/bot was operational on or before July 1, 2022, must complete only the [RPA Stage II Registration Form – Grandfathered Entities](#). Grandfathered entities are also required to submit a copy of the design documentation that outlines how the bot functions in the POSC, any relevant test cases, and a copy of the signed MassHealth RPA Agreement noting that the organization will comply with the RPA Policy requirements.

- Upon approval of the Stage II registration request, MassHealth will assign an RPA-based User ID for each approved bot transaction. The organization's Primary User, who is responsible for maintaining access to the POSC for the organization, must generate each assigned User ID and ensure it is linked to the organization's relevant users before executing any bot transactions on the POSC. The User ID generated by the organization must match the assigned User ID exactly. MassHealth has provided an RPA User ID Job Aid to facilitate creation of the assigned User ID.

- Organizations that wish to modify the approved bot's activity must submit an RPA Modification Form to MassHealth for approval.

- All RPA request forms and related correspondence can be submitted to MassHealth at functional.coordination@mass.gov.

RPA Policy Website

The RPA Policy and all relevant forms can be found at the MassHealth Robotics Processing Automation (RPA) Policy page. The following registration forms and related documents can be downloaded and submitted to MassHealth for review:

- RPA Stage I Registration Form
- RPA Stage II Registration Form
- RPA Stage II Registration Form – Grandfathered Entities
- RPA Modification Form
- RPA User ID Job Aid
- RPA Agreement
- RPA Policy

MassHealth Website

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Questions

If you have any questions regarding this RPA Policy bulletin, please email MassHealth at functional.coordination@mass.gov.

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