




MassHealth
All Provider Bulletin 377
September 2023

TO: All Providers Participating in MassHealth

FROM: Mike Levine, Assistant Secretary for MassHealth 

RE: **MassHealth Provider Online Service Center (POSC) Primary User Policy**

Overview

The Medicaid Management Information System (MMIS) Provider Online Service Center (POSC) allows organizations to access and manage information entered or exchanged with MassHealth at the Provider ID/Service Location (PID/SL) level. It also allows organizations to access MassHealth's HIPAA transaction connectivity methods through use of the Virtual Gateway (VG) User ID and password.

MassHealth requires that all providers, business partners, and relationship entities (henceforth, "organizations"), at a minimum, manage access to their information within MassHealth's Medicaid Management Information System (MMIS) Provider Online Service Center (POSC) using the "Administer Account" function on the POSC and comply with MassHealth's Primary User Policy.

The Primary User within each organization's PID/SL is the person responsible for managing access to the organization's information. This includes the creation and inactivation of users' accounts and password resets. The Primary User manages subordinate accounts for all other users within the organization and can authorize access for business partners, such as billing agencies, to perform POSC and connectivity method functions on behalf of the organization.

The MassHealth Primary User Policy defines the minimum responsibilities of both the organization and the Primary User assigned to each organization PID/SL to maintain access to the organization's MMIS information. Please review the entire [Primary User Policy](#) to ensure that your organization completely understands and adheres to the policy.

Organization Responsibilities

As outlined in the Primary User Policy, each organization enrolled with MassHealth must ensure that access to its information within the POSC is managed appropriately. Specifically, the organization must:

- Assign a single Primary User to manage access to the organization's information within the POSC and a single backup Primary User to manage access to the organization's information if the Primary User is unavailable.
- Ensure that both the Primary User and backup Primary User roles are filled and actively managing access to the organization's information at all times.
- Implement policies to ensure that only those users who should have access to the organization's data can view, submit, or receive information on behalf of the organization.

Each organization enrolled with MassHealth must ensure that procedures are in place to support the secure management and access of the organization's information. Specifically, organizations must ensure that:

- User education and the assignment and maintenance of the Primary User and the backup Primary User are timely and accurate.
- User IDs are inactivated on a timely basis once a staff person or affiliate has left the organization or been terminated.
- User access is modified on a timely basis once a staff person's role has changed within the organization, or the contractual relationship with an affiliate has been modified.

Organizations must ensure that there is not a single Primary User responsible for managing access to a large provider organization's information for an excessive number of PID/SLs. The number of staff and affiliate organizations associated with multiple PID/SLs can become difficult to maintain. Large provider organizations must align the PID/SLs across multiple Primary Users based on the size of the organizations that they will be responsible for managing. This will ensure the level of review and maintenance can be maintained effectively.

Organizations must also establish and maintain a quarterly, semiannual, or annual review of all POSC user access to ensure that only those individuals who should have access to the organization's data can view, submit, or receive information on behalf of the organization.

Primary User Responsibilities

As outlined in the Primary User Policy, the Primary User is responsible for managing access to the organization's MassHealth MMIS information. The POSC enables the Primary User to manage and perform the following basic tasks for subordinate users:

- Creating User IDs for subordinate users (staff, affiliates) and grant them access to perform certain POSC functions on behalf of the organization.
- Linking subordinate users to PID/SLs to allow them to perform certain POSC functions on behalf of specific enrolled service locations managed by the organization.
- Resetting passwords for Subordinate User IDs and modifying POSC access for subordinate User IDs to align with the user's job functions.
- Deactivating and reactivating subordinate User IDs.

Once the Primary User has been established for the organization's PID/SL (or multiple PID/SLs), the Primary User must conduct the following activities to create subordinate user accounts:

- Immediately assign a backup Primary User to perform Primary User responsibilities in the Primary User's absence. This can be accomplished by creating a User ID for that individual.
- Grant the backup Primary User access to perform all functions that the Primary User can perform. This includes the "Manage Subordinates" function. This function allows the Primary User and the backup Primary User to [create and maintain subordinate User IDs](#) for the organization and its affiliates. The Primary User and backup Primary User must not grant access to the "Manage Subordinates" function to any other user.

- Establish and maintain subordinate accounts and grant POSC access to users (staff, affiliates) to view, submit, or receive information on behalf of the organization (e.g., submit claims, check claims status, or verify member eligibility).
- Ensure that organization staff and its affiliate staff are notified and aware of key access information regarding user access and the role of the Primary User. This includes who the Primary User and backup Primary User are, how to contact them, and under what circumstances they must be contacted. Staff must also be informed of the organization's policy and protocols regarding User ID and secure access.
- Establish and maintain a quarterly, semiannual, or annual review and alignment of all user access to safeguard the organization's MassHealth information. In such review, at a minimum, the Primary User must:
 - Validate which users are actively performing services for the organization (staff and affiliates) and which users have left the organization or any affiliate organization.
 - Validate that each active user only has access to perform the services that they are required to perform on behalf of the organization.
 - Modify or inactivate User IDs to ensure that the access aligns with the active user's responsibilities.
 - Generate a report that is used to monitor and report the status of User access within the organization.
- Both the Primary User and the back-up Primary User must notify management immediately if either leaves the position so that these roles can be filled as soon as possible.

Please note: Primary Users and backup Primary Users who do not, at a minimum, adhere to the Primary User responsibilities noted above may introduce data security risks to the organization. Such data security risks have the potential to result in fraud or abuse.

Primary User Assignment and Maintenance

As outlined in the Primary User Policy, each organization must establish and maintain a Primary User and a backup Primary User to manage access to the organization's information on the POSC. In order to establish an initial Primary User, organizations must complete a [Provider Enrollment Data Collection Form](#) during the enrollment of a new PID/SL and submit the form to MassHealth along with the provider enrollment package.

MassHealth will evaluate the Data Collection Form. Upon approval, MassHealth will issue a Virtual Gateway (VG) User ID that will enable the Primary User assigned to the newly established PID/SL to access the POSC. The Primary User can then begin to create subordinate users under the "Administer Account" function. The VG User ID will be sent to the email address noted on the Data Collection Form. Organizations can assign the same Primary User to multiple PID/SLs as necessary.

In order to modify the Primary User for an existing PID/SL, organizations must complete the [Existing Provider Modification Data Collection Form](#). This form can be submitted to MassHealth any time the organization needs to modify the Primary User. The MassHealth Data Collection Form process and FAQ can be found at mass.gov/RegisterMassHealthProvider.

The VG serves as a single access point of entry to all EOHHS-hosted applications. It's a secure portal that provides access into the MMIS POSC upon appropriate User ID and password authentication.

MassHealth
All Provider Bulletin 377
September 2023
Page 4 of 4

- Each user is prompted to agree to the VG Terms and Conditions upon initial sign-in.
- All organizations that have been assigned a User ID and Password to access the VG-hosted MMIS Provider Online Service Center (POSC) and connectivity methods are solely responsible for the use of that User ID and must not share it with any other individual.
- If a user violates the VG Terms and Conditions, their User ID may be terminated.

Primary User Policy Website

Please review the entire Primary User Policy at www.mass.gov/guides/masshealth-provider-online-service-center-posc-primary-user-policy to ensure that your organization completely understands the requirements.

MassHealth Website

This bulletin is available on the [MassHealth Provider Bulletins](#) web page.

[Sign up](#) to receive email alerts when MassHealth issues new bulletins and transmittal letters.

Questions

Dental Services

Phone: (800) 207-5019; TTY: (800) 466-7566

Long-Term Services and Supports

Phone: (844) 368-5184 (toll free)
Email: support@masshealthltss.com
Portal: www.MassHealthLTSS.com
Mail: MassHealth LTSS, PO Box 159108, Boston, MA 02215
Fax: (888) 832-3006

All Other Provider Types

Phone: (800) 841-2900; TDD/TTY: 711
Email: provider@masshealthquestions.com