

Network Adequacy and Access Assurances (NAAAR) Report for Massachusetts: Behavioral Health Vendor (PIHP)

Submission name	Plan type	Reporting period start date	Reporting period end date	Last edited	Edited by	Status
Behavioral Health Vendor (PIHP)	PIHP	01/01/2025	12/31/2025	05/12/2026	Alison Kirchgasser	Submitted

Section I. State and program information

A. State information and reporting scenario

Who should CMS contact with questions regarding information reported in the NAAAR? Follow-on communications related to this report will be made to the primary contact.

Use this section to report your contact information, date of report submission, and reporting scenario.

Number	Indicator	Response
IA.1	Contact name First and last name of the contact person.	Alison Kirchgasser
IA.2	Contact email address Enter email address. Department or program-wide email addresses are permitted.	alison.kirchgasser@mass.gov
IA.3	State or territory Auto-populates from your account profile.	Massachusetts
IA.4	Date of report submission CMS receives this date upon submission of this report.	05/20/2026
IA.5	Reporting scenario Enter the scenario under which the state is submitting this form to CMS. Under 42 C.F.R. § 438.207(c) - (d), the state must submit an assurance of compliance after reviewing documentation submitted by a plan under the following three scenarios:Scenario 1: At the time the plan enters into a contract with the state;Scenario 2: On an annual basis;Scenario 3: Any time there has been a significant change (as defined by the state) in the plan's operations that would affect its adequacy of capacity and services, including (1) changes in the plan's services, benefits, geographic service area, composition of or payments to its provider network, or (2) enrollment of a new population in the plan.States should complete one (1) form with information for applicable managed care plans and programs. For example, if the state submits this form under scenario 1 above, the state should submit this form only for the managed care plan (and the applicable managed care program) that entered into a new contract with the state. The state should not report on any other plans or programs under this scenario. As another	Scenario 2: Annual report

example, if the state submits this form under scenario 2, the state should submit this form for all managed care plans and managed care programs.

B. Add plans

Enter the name of each plan that participates in the program for which the state is reporting data. If the state is submitting this form because it's entering into a contract with a plan or because there's a significant change in a plan's operations, include only the name of the applicable plan.

Plan names should match the plan names used in your Managed Care Plan Annual Report (MCPAR) for this program for the same reporting period.

Indicator	Response
Plan name	Massachusetts Behavioral Health Partnership (MBHP)

C. Provider type coverage

If your standards apply to more specific provider types, select the most closely aligned provider type category and utilize the subcategory fields available in Section II. Program-level access and network adequacy standards under "Provider type covered by standard".

Number	Indicator	Response
N/A	Select all core provider types covered in the program	Mental health Substance Use Disorder (SUD)

D. Analysis methods

States should use this section of the tab to report on the analyses that are used to assess plan compliance with the state's 42 C.F.R. § 438.68 and 42 C.F.R. § 438.206 standards.

Number	Indicator	Response
N/A	<p data-bbox="313 107 704 180">Is this analysis method used to assess plan compliance?</p> <p data-bbox="313 201 678 359">Select "Yes" if the method is utilized to assess plan compliance with the state's standards, as required at 42 C.F.R. § 438.68.</p>	<p data-bbox="813 138 992 170">Geomapping</p> <p data-bbox="813 191 911 218">Utilized</p> <p data-bbox="813 239 1089 266">Frequency: Quarterly</p> <p data-bbox="813 287 1349 340">Plan(s): Massachusetts Behavioral Health Partnership (MBHP)</p> <p data-bbox="813 382 1247 413">Plan Provider Directory Review</p> <p data-bbox="813 434 911 462">Utilized</p> <p data-bbox="813 483 1089 510">Frequency: Quarterly</p> <p data-bbox="813 531 1349 583">Plan(s): Massachusetts Behavioral Health Partnership (MBHP)</p> <p data-bbox="813 625 1349 657">Secret Shopper: Network Participation</p> <p data-bbox="813 678 911 705">Utilized</p> <p data-bbox="813 726 1089 753">Frequency: Quarterly</p> <p data-bbox="813 774 1349 827">Plan(s): Massachusetts Behavioral Health Partnership (MBHP)</p> <p data-bbox="813 869 1224 932">Secret Shopper: Appointment Availability</p> <p data-bbox="813 953 911 980">Utilized</p> <p data-bbox="813 1001 1089 1029">Frequency: Quarterly</p> <p data-bbox="813 1050 1349 1102">Plan(s): Massachusetts Behavioral Health Partnership (MBHP)</p> <p data-bbox="813 1144 1263 1207">Electronic Visit Verification Data Analysis</p> <p data-bbox="813 1228 964 1255">Not utilized</p> <p data-bbox="813 1297 1360 1329">Review of Grievances Related to Access</p> <p data-bbox="813 1350 911 1377">Utilized</p> <p data-bbox="813 1398 1089 1425">Frequency: Quarterly</p> <p data-bbox="813 1446 1349 1499">Plan(s): Massachusetts Behavioral Health Partnership (MBHP)</p> <p data-bbox="813 1541 1154 1572">Encounter Data Analysis</p> <p data-bbox="813 1593 911 1621">Utilized</p> <p data-bbox="813 1642 1089 1669">Frequency: Quarterly</p> <p data-bbox="813 1690 1349 1743">Plan(s): Massachusetts Behavioral Health Partnership (MBHP)</p>

Section II. Program-level access and network adequacy standards

II. Program-level access and network adequacy standards

Report each network adequacy standard included in managed care program contract for this program as required under 42 CFR § 438.68; select "Add standard" to report each unique standard. 42 § CFR 438.206 standards will be addressed in section III. Plan compliance.

Standard total count: 26

#	Provider	Standard type	Standard description	Analysis methods	Pop.	Region
1	Mental health; Psychiatric inpatient	Maximum time or distance	Two within 60 miles or 60 minutes	Geomapping	Adult	Statewide except for Oak Bluffs and Nantucket Service Areas
2	Mental health; Psychiatric inpatient	Closest providers	Contract with two closest providers	Geomapping	Adult	Oak Bluffs and Nantucket Service Areas
3	Substance Use Disorder (SUD); Monitored inpatient level 3.7	Maximum time or distance	Two within 30 miles or 30 minutes	Geomapping	Adult	Statewide
4	Substance Use Disorder (SUD); Clinical Stabilization Service level 3.5	Maximum time or distance	Two within 30 miles or 30 minutes	Geomapping	Adult	Statewide except Nantucket service area
5	Substance Use Disorder (SUD); Clinical Stabilization Service level 3.5	Closest providers	Contract with four closest providers	Geomapping	Adult	Nantucket service area
6	Mental health; Youth Community Crisis Stabilization (YCCS)	Maximum time or distance	Two within 30 miles or 30 minutes	Geomapping	Pediatric	Statewide
7	Mental health; Partial Hospitalization (PHP)	Maximum time or distance	One within 60 miles or 60 minutes	Geomapping	Adult and pediatric	Statewide

8	Mental health; Intensive Care Coordination (ICC)	Maximum time or distance	Two within 30 miles or 30 minutes	Geomapping	Pediatric	Statewide
9	Mental health; Applied Behavioral Analysis (ABA)	Maximum time or distance	Two within 30 miles or 30 minutes	Geomapping	Pediatric	Statewide
10	Mental health; In-Home Behavioral Services	Maximum time or distance	Two within 30 miles or 30 minutes	Geomapping	Pediatric	Statewide
11	Mental health; In-Home Therapy	Maximum time or distance	Two within 30 miles or 30 minutes	Geomapping	Pediatric	Statewide
12	Mental health; Therapeutic Mentoring Services	Maximum time or distance	Two within 30 miles or 30 minutes	Geomapping	Pediatric	Statewide
13	Substance Use Disorder (SUD); Structured Outpatient Addiction Program (SOAP)	Maximum time or distance	Two within 30 miles or 30 minutes	Geomapping	Adult and adolescent	Statewide
14	Mental health; BH outpatient (including psychology and psych APN)	Maximum time or distance	Two within 30 miles or 30 minutes	Geomapping	Adult and pediatric	Statewide
15	Substance Use Disorder (SUD); Opioid Treatment Program (OTP)	Maximum time or distance	Two within 30 miles or 30 minutes	Geomapping	Adult	Statewide

16	Mental health; Other Outpatient BH Services	Appointment wait time	Within 7 calendar days of discharge	Geomapping	Adult and pediatric	Statewide
17	Mental health; Intensive Care Coordination Services	Appointment wait time	Within the timeframe directed by EOHHS	Geomapping	Pediatric	Statewide
18	Mental health; Behavioral Health Services	Hours of operation	No less than the hours of operation offered to commercial enrollees or MassHealth Fee-for- Service	Geomapping	Adult and Pediatric	Statewide
19	Mental health; Psychiatry	Maximum time or distance	20 miles or 40 minutes	Geomapping	Adult and Pediatric	Statewide
20	Mental health; AMCI/YMCI	Appointment wait time	Within 60 minutes of time of the Covered Individual's readiness to receive such services.	Geomapping	Adult and Pediatric	Statewide
21	Mental health; Behavioral Health Crisis Services in Acute Medical Settings: Crisis Evaluation	Appointment wait time	within 60 minutes of the Covered Individual's readiness to receive such assessment	Geomapping	Adult and Pediatric	Statewide
22	Mental health; Behavioral Health Urgent Care	Appointment wait time	Within 48 hours for services that are not Emergency Services, Mobile Crisis Intervention, or routine services	Geomapping	Adult and Pediatric	Statewide

23	Mental health; Other Behavioral Health Services	Appointment wait time	Within 14 calendar days of discharge	Geomapping	Adult and Pediatric	Statewide
24	Mental health; Non- 24- Hour Diversionary Services	Appointment wait time	Within 2 calendar days of discharge	Geomapping	Adult and Pediatric	Statewide
25	Mental health; Medication Management	Appointment wait time	Within 14 calendar days of discharge	Geomapping	Adult and Pediatric	Statewide
26	Mental health; Emergency Services	Appointment wait time	Immediately, on a 24-hour basis, 7 days per week	Geomapping	Adult and Pediatric	Statewide

Section III. Plan compliance

III. Plan compliance

Use this section to report on plan compliance with the state's standards, as required at 42 C.F.R. § 438.68. This section is also used to report on plan compliance with 42 C.F.R. § 438.206 standards.

Massachusetts Behavioral Health Partnership (MBHP)

A. Assurance of plan compliance for 438.68

Indicator	Response
<p>A. Assurance of plan compliance for 438.68</p> <p>III.A.1 Indicate whether the state assures that the plan complies with the state’s standards, as required at § 42 C.F.R. 438.68 (i.e., the standards previously entered by the state) based on each analysis the state conducted for the plan during the reporting period.</p>	<p>No, the plan does not comply on all standards based on all analyses or exceptions granted</p>

Select “Enter/Edit” to provide details on standards that were either non-compliant or for which an exception was granted

Non-compliant standards for 438.68

Total: 0 of 26

Exceptions standards for 438.68

Total: 10 of 26

3 Maximum time or distance

Two within 30 miles or 30 minutes

Provider type(s)

Substance Use Disorder (SUD); Monitored inpatient level 3.7

Analysis method(s)

Geomapping

Region

Statewide

Population

Adult

Exceptions granted for Massachusetts Behavioral Health Partnership (MBHP) under 42 C.F.R. § 438.68(d)

Describe any network adequacy standard exceptions that the state has granted to the plan under 42 C.F.R. § 438.68(d).

There are not enough of these providers in the Adams, Greenfield, Nantucket, Oak Bluffs, Orleans, Pittsfield, Springfield, or Westfield service areas.

Justification for exceptions granted under 42 C.F.R. § 438.68(d)

The plan is contracting with all nearby providers. For Nantucket, Oak Bluffs, and Orleans, MBHP holds a contract with all nearby providers. For the remaining service areas, MBHP is pursuing a contract with Swift River to expand their network.

4 Maximum time or distance

Two within 30 miles or 30 minutes

Provider type(s)

Substance Use Disorder (SUD); Clinical Stabilization Service level 3.5

Analysis method(s)	Region	Population
Geomapping	Statewide except Nantucket service area	Adult

Exceptions granted for Massachusetts Behavioral Health Partnership (MBHP) under 42 C.F.R. § 438.68(d)

Describe any network adequacy standard exceptions that the state has granted to the plan under 42 C.F.R. § 438.68(d).

There are not enough of these providers in the Adams, Greenfield, Oak Bluffs, Orleans, Pittsfield, Springfield, or Westfield service areas.

Justification for exceptions granted under 42 C.F.R. § 438.68(d)

The plan is contracting with all nearby providers.

6 Maximum time or distance

Two within 30 miles or 30 minutes

Provider type(s)

Mental health; Youth Community Crisis Stabilization (YCCS)

Analysis method(s)	Region	Population
Geomapping	Statewide	Pediatric

Exceptions granted for Massachusetts Behavioral Health Partnership (MBHP) under 42 C.F.R. § 438.68(d)

Describe any network adequacy standard exceptions that the state has granted to the plan under 42 C.F.R. § 438.68(d).

There are not enough of these providers in the Adams, Athol, Attleboro, Barnstable, Beverly, Boston, Brockton, Fall River, Falmouth, Framingham, Gardner-Fitchburg, Gloucester, Greenfield, Haverhill, Lawrence, Lowell, Lynn, Malden, Nantucket, New Bedford, Northampton, Oak Bluffs, Orleans, Pittsfield, Plymouth, Quincy, Revere, Salem, Somerville, Southbridge, Taunton, Waltham, Wareham, Woburn, or Worcester service areas.

Justification for exceptions granted under 42 C.F.R. § 438.68(d)

The plan is contracting with all nearby providers.

8 Maximum time or distance

Two within 30 miles or 30 minutes

Provider type(s)

Mental health; Intensive Care Coordination (ICC)

Analysis method(s)

Geomapping

Region

Statewide

Population

Pediatric

Exceptions granted for Massachusetts Behavioral Health Partnership (MBHP) under 42 C.F.R. § 438.68(d)

Describe any network adequacy standard exceptions that the state has granted to the plan under 42 C.F.R. § 438.68(d).

MBHP does not meet the time or distance standard for Intensive Care Coordination (ICC) in the Adams, Barnstable, Nantucket, Oak Bluffs, Orleans, or Pittsfield service areas.

Justification for exceptions granted under 42 C.F.R. § 438.68(d)

There are not enough of these providers in the service areas named above. MBHP contracts with the ICC providers that fall under the state ICC procurement. The plan is contracting with all nearby providers.

9 Maximum time or distance

Two within 30 miles or 30 minutes

Provider type(s)

Mental health; Applied Behavioral Analysis (ABA)

Analysis method(s)	Region	Population
Geomapping	Statewide	Pediatric

Exceptions granted for Massachusetts Behavioral Health Partnership (MBHP) under 42 C.F.R. § 438.68(d)

Describe any network adequacy standard exceptions that the state has granted to the plan under 42 C.F.R. § 438.68(d).

MBHP does not meet the time or distance standard for Applied Behavioral Analysis (ABA) in the Nantucket service area.

Justification for exceptions granted under 42 C.F.R. § 438.68(d)

There are not enough of these providers in the service areas named above. The plan is contracting with all nearby providers.

10 Maximum time or distance

Two within 30 miles or 30 minutes

Provider type(s)

Mental health; In-Home Behavioral Services

Analysis method(s)	Region	Population
Geomapping	Statewide	Pediatric

Exceptions granted for Massachusetts Behavioral Health Partnership (MBHP) under 42 C.F.R. § 438.68(d)

Describe any network adequacy standard exceptions that the state has granted to the plan under 42 C.F.R. § 438.68(d).

MBHP does not meet the time or distance standard for In-Home Behavioral Services (IHBS) in the Barnstable, Nantucket, Oak Bluffs, or Orleans service areas.

Justification for exceptions granted under 42 C.F.R. § 438.68(d)

There are not enough of these providers in the service areas named above. The plan is contracting with all nearby providers.

11 Maximum time or distance

Two within 30 miles or 30 minutes

Provider type(s)

Mental health; In-Home Therapy

Analysis method(s)

Geomapping

Region

Statewide

Population

Pediatric

Exceptions granted for Massachusetts Behavioral Health Partnership (MBHP) under 42 C.F.R. § 438.68(d)

Describe any network adequacy standard exceptions that the state has granted to the plan under 42 C.F.R. § 438.68(d).

MBHP does not meet the time or distance standard for In-Home Therapy in the Nantucket service area.

Justification for exceptions granted under 42 C.F.R. § 438.68(d)

There are not enough of these providers in the service areas named above. The plan is contracting with all nearby providers.

12 Maximum time or distance

Two within 30 miles or 30 minutes

Provider type(s)

Mental health; Therapeutic Mentoring Services

Analysis method(s)

Geomapping

Region

Statewide

Population

Pediatric

Exceptions granted for Massachusetts Behavioral Health Partnership (MBHP) under 42 C.F.R. § 438.68(d)

Describe any network adequacy standard exceptions that the state has granted to the plan under 42 C.F.R. § 438.68(d).

MBHP does not meet the time or distance standard for Therapeutic Mentoring (TM) Services in the Nantucket service area.

Justification for exceptions granted under 42 C.F.R. § 438.68(d)

There are not enough of these providers in the service areas named above. The plan is contracting with all nearby providers.

13 Maximum time or distance

Two within 30 miles or 30 minutes

Provider type(s)

Substance Use Disorder (SUD); Structured Outpatient Addiction Program (SOAP)

Analysis method(s)

Geomapping

Region

Statewide

Population

Adult and adolescent

Exceptions granted for Massachusetts Behavioral Health Partnership (MBHP) under 42 C.F.R. § 438.68(d)

Describe any network adequacy standard exceptions that the state has granted to the plan under 42 C.F.R. § 438.68(d).

MBHP does not meet the time or distance standard for Structured Outpatient Addiction Program (SOAP) in the Adams, Nantucket, Orleans, or Pittsfield service areas.

Justification for exceptions granted under 42 C.F.R. § 438.68(d)

There are not enough of these providers in the service areas named above. The plan is contracting with all nearby providers.

15 Maximum time or distance

Two within 30 miles or 30 minutes

Provider type(s)

Substance Use Disorder (SUD); Opioid Treatment Program (OTP)

Analysis method(s)

Geomapping

Region

Statewide

Population

Adult

Exceptions granted for Massachusetts Behavioral Health Partnership (MBHP) under 42 C.F.R. § 438.68(d)

Describe any network adequacy standard exceptions that the state has granted to the plan under 42 C.F.R. § 438.68(d).

MBHP does not meet the time or distance standard for Opioid Treatment Program (OTP) in the Adams, Nantucket, Oak Bluffs, Orleans, or Pittsfield service areas.

Justification for exceptions granted under 42 C.F.R. § 438.68(d)

There are not enough of these providers in the service areas named above. The plan is contracting with all nearby providers.

B. Assurance of plan compliance for 438.206

Indicator	Response
<p data-bbox="315 191 634 260">B. Assurance of plan compliance for 438.206</p> <p data-bbox="315 285 727 554">III.B.1 Indicate whether the state assures that the plan complies with the availability of services standards outlined in 42 C.F.R. § 438.206 the analyses the state conducted for the plan during the reporting period.</p>	Yes, the plan complies on all standards based on all analyses