

ACO Report:

Mercy Health Accountable Care Organization in partnership with Boston Medical Center HealthNet Plan (BMCHP Mercy)

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DSRIP Midpoint Assessment Highlights & Key Findings



Mercy Health Accountable Care Organization in partnership with Boston Medical Center HealthNet Plan (BMCHP Mercy)

Model A ACO

BMCHP Mercy is a MassHealth Accountable Care Partnership Plan (ACPP), a "Model A" ACO, and is also known as BMC HealthNet Plan Community Alliance.

An ACPP is a partnership between a single health plan and a provider-led ACO that receives monthly capitated payments from MassHealth, based on enrollment and member risk scores, and takes on full insurance risk for the population.



DSRIP ATTRIBUTION AND FUNDING

2017 (Jul-Dec)	28k members	\$3.7M
2018	28k members	\$6.9M
2019	28k members	\$5.1M

POPULATIONS SERVED

- BMCHP Mercy serves a more ethnically and racially diverse population than is represented in Hampden County as a whole.
- Approximately one in three members are Hispanic.
- ▶ The Greater Springfield area is a destination for refugee immigrants from Africa, the Middle East and other war-torn areas; a small number of members will require supports to engage in and utilize health care
- Approximately 8% of members' primary language is not English.

FOCUS AREA	IA FINDINGS	
Organizational Structure and Engagement	On Track	
Integration of Systems and Processes	On Track	
Workforce Development	On Track	 Limited Recommendations
Health Information Technology and Exchange	On Track	 Limited Recommendations
Care Coordination and Care Management	On Track	 Limited Recommendations
Population Health Management	On Track	

IMPLEMENTATION HIGHLIGHTS

- The ACO implements performance improvement efforts through regional and local Clinical Integrated Networks (CIN), ensuring that both regional and local providers are represented in the care delivery change efforts.
- The vast majority of BMCHP Mercy practice sites reported that performance measures on quality and cost are reported
 and shared with physicians as a component of performance measurement and management, with practice sites also
 reporting one-on-one review and feedback as a primary mechanism for performance management.
- BMCHP Mercy uses a variety of mechanisms to retain its staff. Retention methods include appointing Local Group and
 Clinical Champions to serve for instance, as primary points of contact during onboarding of care coordination and care
 management (CCCM) team members at practice sites. Peer to peer systems which match new members of CCCM teams
 with more experienced members for assistance with onboarding and learning has also been reported by the ACO as an
 strategy to improve retention rates.

A complete description of the sources can be found on the reverse/following page.

LIST OF SOURCES FOR INFOGRAPHIC

Service area maps	Blue dots represent ACO primary care practice site locations as of 1/1/2019.
	Shaded area represents service area as of 7/1/2019.
	Service areas are determined by MassHealth by member addresses, not practice locations.
	Service area zip codes and practice site locations were provided to the IA by MassHealth.
DSRIP Funding & Attributed Members	Funding and attribution were provided to the IA by MassHealth. DSRIP funding is the allocated non-at-risk start- up and ongoing funding for the year; it does not include any rollover, DSTI Glide Path or Flexible Services allocations.
	The number of members shown for 2017 was used solely for DSRIP funding calculation purposes, as member enrollment in ACOs did not begin until March 1, 2018.
Population Served	Paraphrased from the ACO's Full Participation Plan.
Implementation Highlights	Paraphrased from the required annual and semi-annual progress reports submitted by the ACO to MassHealth.

NOTES

Performance risk is defined as the risk of being unable to treat an illness cost-effectively (unable to control controllable costs). Insurance risk is defined as the risk that a patient will become sick or that a group of patients will have higher than estimated care needs.

INTRODUCTION

Centers for Medicare and Medicaid Services' (CMS') requirements for the MassHealth Section 1115 Demonstration specify that an independent assessment of progress of the Delivery System Reform Incentive Payment (DSRIP) Program must be conducted at the Demonstration midpoint. In satisfaction of this requirement, MassHealth has contracted with the Public Consulting Group to serve as the Independent Assessor (IA) and conduct the Midpoint Assessment (MPA). The IA used participation plans, annual and semi-annual reports, survey responses, and key informant interviews (KIIs) to assess progress of Accountable Care Organizations¹ (ACOs) towards the goals of DSRIP during the time period covered by the MPA, July 1, 2017 through December 31, 2019.

Progress was defined by the ACO actions listed in the detailed MassHealth DSRIP Logic Model (Appendix I), organized into a framework of six focus areas which are outlined below. This model was developed by MassHealth and the Independent Evaluator² (IE) to tie together the implementation steps and the short- and long-term outcomes and goals of the program. It was summarized into a high-level logic model which is described in the CMS approved Massachusetts 1115 MassHealth Demonstration Evaluation Design document (https://www.mass.gov/doc/ma-independent-evaluation-design-1-31-19-0/download).

The question addressed by this assessment is:

To what extent has the ACO taken organizational level actions, across six areas of focus, to transform care delivery under an accountable and integrated care model?

This report provides the results of the IA's assessment of the ACO that is the subject of this report. The ACO should carefully consider the recommendations provided by the IA, and MassHealth will encourage ACOs to take steps to implement the recommendations, where appropriate. Any action taken in response to the recommendations must comply with contractual requirements and programmatic guidance.

MPA FRAMEWORK

The ACO MPA findings cover six "focus areas" or aspects of health system transformation. These were derived from the DSRIP logic model (Appendix I), by grouping organizational level actions referenced in the logic model into the following domains:

- 1. Organizational Structure and Engagement
- 2. Integration of Systems and Processes
- 3. Workforce Development
- 4. Health Information Technology and Exchange
- 5. Care Coordination and Management
- 6. Population Health Management

Table 1 shows the ACO actions that correspond to each focus area. The ACO actions are broad enough to be accomplished in a variety of ways by different organizations, and the scope of the IA is to assess progress, not to determine the best approach for an ACO to take.

¹ For the purpose of this report, the term ACO refers to all ACO health plan options: Accountable Care Partnership Plans, Primary Care ACO plans, and the Managed Care Administered ACO plan. See the ACO Background section for a description of the ACO's organizational structure.

² The Independent Evaluator (IE) – a distinct role separate from the Independent Assessor - is responsible for evaluating the outcomes of the Demonstration.

The focus area framework was used to assess each entity's progress. A rating of "On track" indicates that the ACO has made appropriate progress in accomplishing the indicators for the focus area. Where gaps in progress were identified, the entity was rated "On track with limited recommendations" or, in the case of more substantial gaps, "Opportunity for improvement." See Methodology section for an explanation of the threshold setting process for the ratings.

Table 1. Framework for Organizational Assessment of ACOs

Focus Area	ACO Actions
Organizational Structure and Governance	 ACOs established with specific governance, scope, scale, & leadership ACOs engage providers (primary care and specialty) in delivery system change through financial (e.g. shared savings) and non-financial levers (e.g. data reports)
Integration of Systems and Processes	 ACOs establish structures and processes to promote improved administrative coordination between organizations (e.g. enrollee assignment, engagement and outreach) ACOs establish structures and processes to promote improved clinical integration across organizations (e.g. administration of care management/coordination, recommendation for services) ACOs establish structures and processes for joint management of performance and quality, and conflict resolution Accountable Care Partnership Plans (Model A) transition more of the care management responsibilities to their ACO Partners over the course of the Demonstration
Workforce Development	 ACOs recruit, train, and/or re-train administrative and provider staff by leveraging Statewide Investments (SWIs) and other supports; education includes better understanding and utilization of behavioral health (BH) and long-term services and supports (LTSS)
Health Information Technology and Exchange	 ACOs develop Health Information Technology and Exchange (HIT/HIE) infrastructure and interoperability to support provision of population health management (e.g. reporting, data analytics) and data exchange within and outside the ACO (e.g. Community Partners/Community Service Agencies (CPs/CSAs), BH, LTSS, and specialty providers)
Care Coordination and Care Management	 ACOs develop systems and structures to coordinate services across the care continuum (i.e. medical, BH, LTSS, and social services), that align (i.e. are complementary) with services provided by other state agencies (e.g., Department of Mental Health (DMH))
Population Health Management	 ACOs develop capabilities and strategies for non-CP-related population health management approaches, which include risk stratification, needs screenings and assessments, and addressing the identified needs in the population via range of programs (e.g., disease management programs for chronic conditions, specific programs for co-occurring mental health (MH)/substance use disorder (SUD) conditions) ACOs develop structures and processes for integration of health-related social needs (HRSN) into their Population Health Management (PHM) strategy, including management of flexible services ACOs develop strategies to reduce total cost of care (TCOC; e.g. utilization management, referral management, non-CP complex care management programs, administrative cost reduction)

METHODOLOGY

The IA employed a qualitative approach to assess ACO progress towards DSRIP goals, drawing on a variety of data sources to assess organizational performance in each focus area. The IA performed a desk review of participants' submitted reports and of MassHealth supplementary data, covering the period

of July 1, 2017 through December 31, 2019. These included Full Participation Plans, annual and semiannual reports, budgets and budget narratives. In addition, the IA developed an ACO Practice Site Administrator survey ("the survey") to investigate the activities and perceptions of provider practices participating in ACOs. For ACOs with at least 30 practice sites, a random sample of 30 sites was drawn; for smaller ACOs, all sites were surveyed. Survey results were aggregated by ACO for the purpose of assessing each ACO. A supplementary source was the transcripts of KIIs of ACO leaders conducted jointly by the IA and the IE.

The need for a realistic threshold of expected progress, in the absence of any pre-established benchmark, led the IA to use a semi-empirical approach to define the state that should be considered "On track." As such, the IA's approach was to first investigate the progress of the full ACO cohort in order to calibrate expectations and define thresholds for assessment.

Guided by the focus areas, the IA performed a preliminary review of Full Participation Plans and annual and semi-annual reports. This horizontal review identified a broad range of activities and capabilities that fell within the focus areas, yielding specific operational examples of how ACOs can accomplish the logic model actions for each focus area. Once an inclusive list of specific items was compiled, the IA considered the prevalence of each item and its relevance to the focus area. A descriptive definition of On track performance for each focus area was developed from the items that had been adopted by a plurality of entities. Items that had been accomplished by only a small number of ACOs were considered to be promising practices, not expectations at midpoint. This calibrated the threshold for expected progress to the actual performance of the ACO cohort as a whole.

Qualitative coding of documents was used to aggregate the data for each ACO by focus area, and then coded excerpts and survey data were reviewed to assess whether and how each ACO had met the defined threshold for each focus area. The assessment was holistic and did not require that entities meet every item listed for a focus area. A finding of On track was made where the available evidence demonstrated that the entity had accomplished all or nearly all of the expected items, and no need for remediation was identified. When evidence from coded documents was lacking for a specific action, additional information was sought through a keyword search of KII transcripts. Prior to finalizing the findings for an entity, the team convened to confirm that thresholds had been applied consistently and that the reasoning was clearly articulated and documented.

See Appendix II for a more detailed description of the methodology.

ACO BACKGROUND³

Mercy Health Accountable Care Organization in partnership with BMC HealthNet Plan (BMCHP Mercy) is an Accountable Care Partnership Plan (ACPP), a "Model A" ACO, and is also known as BMC HealthNet Plan Mercy Alliance. An ACPP is a partnership between a single health plan and a provider-led ACO that receives monthly capitated payments from MassHealth based on enrollment and member risk scores and takes on full insurance risk⁴ for the population.

BMCHP provides a wide range of administrative functions for the ACPP including network management, member services, claims adjudication and compliance. BMCHP Mercy is one of four ACPPs for which BMCHP holds a contract with EOHHS.

BMCHP Mercy's service area includes Hampshire, Hampden, and Franklin counties, with the vast majority of members located in Hampden.

³ Background information is summarized from the organization's Full Participation Plan.

⁴ Insurance risk is defined as the risk that a patient will become sick or that a group of patients will have higher than estimated care needs.

BMCHP Mercy's MassHealth member attribution and allocated non-at-risk start-up and ongoing DSRIP funding are summarized below.

Table 2. BMCHP Mercy MassHealth Members and DSRIP Funding 2017-2019⁵

Year	Members	DSRIP Funding
2017 (partial year, Jul-Dec)	28,000 ⁶	\$3,654,896
2018	28,000	\$6,913,082
2019	28,243	\$5,065,816

BMCHP Mercy serves a more ethnically and racially diverse population than is represented in Hampden County as a whole. Approximately one in three members is Hispanic. The Greater Springfield area is a significant destination for refugee immigrants from Africa, the Middle East and other war-torn areas, as such, a small but significant portion of members likely will be relatively new to the United States and the American health care systems. Approximately 8% of the member cohort is non-English speaking.

Notably, Hampden County has the lowest overall ranking of all 14 counties in Massachusetts in health outcomes, quality of life, health behaviors, clinical care and social and economic factors⁷.

SUMMARY OF FINDINGS

The IA finds that BMCHP Mercy is On track or On track with limited recommendations in six of six focus areas.

Focus Area	IA Findings
Organizational Structure and Engagement	On track
Integration of Systems and Processes	On track
Workforce Development	On track with limited recommendations
Health Information Technology and Exchange	On track with limited recommendations
Care Coordination and Care Management	On track with limited recommendations
Population Health Management	On track

FOCUS AREA LEVEL PROGRESS

The following section outlines the ACO's progress across the six focus areas. Each section begins with a description of the established ACO actions associated with an On track assessment. This description is followed by a detailed summary of the ACO's results across all indicators associated with the focus area. This discussion includes specific examples of progress against the ACO's participation plan as well as achievements or promising practices, and recommendations were applicable. The ACO should carefully consider the recommendations provided by the IA, and MassHealth will encourage ACOs to take steps to implement the recommendations, where appropriate. Any action taken in response to the recommendations must be taken in accordance with program guidance and contractual requirements.

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⁵ Funding and attribution were provided to the IA by MassHealth. DSRIP funding is the allocated non-at risk start-up and ongoing funding for the year; it does not include any rollover, DSTI Glide Path or Flexible Services allocations.

⁶ Number provided was used solely for DSRIP funding calculation purposes, as member enrollment in ACOs did not begin until March 1, 2018.

⁷ University of Wisconsin Population Health Institute. County Health Rankings & Roadmaps 2019.www.countyhealthrankings.org.

1. ORGANIZATIONAL STRUCTURE AND ENGAGEMENT

On Track Description

Characteristics of ACOs considered On track:

✓ Established governance structures

- includes representation of providers and members, and a specific consumer advocate, on executive board:
- receives and incorporates, through the executive board, regular input from the population health management team, and the Consumer Advisory Board/Patient Family Advisory Committee;
- has a clear structure for the functions and committees reporting to the board, typically including quality management, performance oversight, and contracts/finance.

✓ Provider engagement in delivery system change

- has established processes for joint management of quality and performance, including regular performance reporting to share quality and performance data, on-going performance review meetings where providers and ACO discuss areas for improvement of performance, and education and training for staff where applicable;
- communicates a clearly articulated performance management strategy, including goals and metrics, to practice sites, but also grants sites some autonomy on how to meet those goals, and uses feedback from providers and sites in ACO-wide continuous improvement for quality and performance.

Results

The IA finds that BMCHP Mercy is **On track with no recommendations** in the Organizational Structure and Engagement focus area.

Established governance structures

BMCHP Mercy's governance structure provides oversight of all operations through a joint venture between BMCHP Mercy's three primary provider groups; the Mercy Hospitals, Mercy Medical Group and Riverbend Medical Group and the ACO's managed care plan at BMCHP.

Members of BMCHP Mercy's Board of Directors, which is comprised of 75% providers from within the system, share ACO governance duties through a Joint Operating Committee (JOC) that is comprised of three representatives from Mercy and three representatives from BMCHP. The JOC's oversight responsibilities include:

- reviewing / approving budget, including DSRIP investments;
- overseeing DSRIP performance related to cost and quality;
- assessing and making recommendations on need for additional provider participants; and
- providing input on areas of collaboration (network development, pharmacy benefit management, behavioral health services, Community Partners).

A Patient Family Advisory Committee (PFAC) reports directly to the ACO's Quality and Clinical Committee which in turn reports to the Mercy Hospital Board of Directors.

Provider engagement in delivery system change

BMCHP Mercy reports supporting care delivery change efforts through a centrally supported regionally managed system. BMCHP Mercy employs a number of quality specialists centrally who serve as both points of contact for a network of regionally organized Clinically Integrated Networks (CIN) as well as the ACO's Community Partners (CPs).

Members who need intervention are identified in regular performance reports that are created and distributed by quality specialists at the BMCHP Mercy. These reports pull data from the ACO's central databases. Chart and clinical protocol audits are also completed by the specialists, and one quality specialist also serves as the primary point of contact for all CPs on issues related to data access and care plan development.

Each Regional CIN is then responsible for identifying and implementing their own care delivery change and performance improvement efforts. Each regional CIN has a Board of Directors with at least half of its members representing the regions physicians. Each regional CIN works with a number of local CINs to support the implementation of the regional CIN's transformation strategies. Regional CINs typically engage with local CINs through designated administrative dyads consisting of a provider and administrator.

The vast majority of BMCHP Mercy practice sites reported that performance measures on quality and cost are reported and shared with physicians as a component of performance measurement and management. The ACO also reports using on-on-one review and feedback as their primary mechanism for managing performance management (Figure 1).

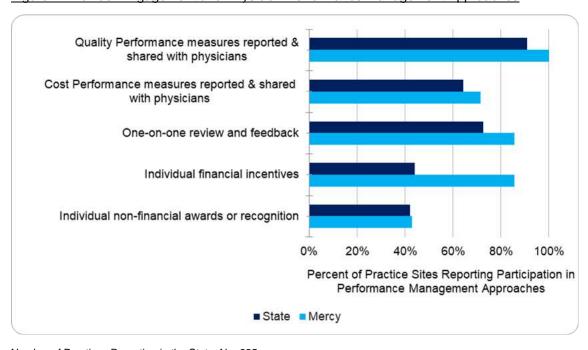


Figure 1. Provider Engagement and Physician Performance Management Approaches

Number of Practices Reporting in the State, N = 225

Number of Practices Reporting in MERCY, N = 7

Figure displays responses to Q37. Which of the following approaches are used to manage the performance of individual physicians who practice at your site? Select all that apply.

Statistical significance testing was not done due to small sample size.

Recommendations

The IA has no recommendations for the Organizational Structure and Engagement focus area.

Promising practices that ACOs have found useful in this area include:

✓ Established governance structures

- engaging Community Partners (CPs) in ACO governance by developing a subcommittee with ACO and CP representatives focused on increasing CP integration and collaboration.
- creating a centralized PFAC to synthesize information from practice site specific PFACs and disseminate promising practices to other provider groups and practice sites within the ACO's network.
- seeking feedback from consumer representatives or PFACs related to member experience prior to adoption of new care protocols or other changes.
- including a patient representative in each of an ACO's subcommittees in addition to having a patient representative on the governing board.

✓ Provider engagement in delivery system change

- protecting dedicated provider time for population health level activities or individual quality improvement projects.
- engaging frontline providers in continuous feedback loops to identify areas where patient experience could be improved.
- hosting regular meetings between providers or provider groups and senior management to collect provider feedback on care management operations and quality improvement initiatives.
- o developing provider-accessible performance dashboards with practice-site level data.
- employing individuals in roles dedicated to QI, who assist providers and practice sites to review quality measures and identify pathways to improve care processes and provider performance.

2. INTEGRATION OF SYSTEMS AND PROCESSES

On Track Description

Characteristics of ACOs considered On track:

√ Administrative coordination among ACO member organizations and with CPs

- circulates frequently updated lists including enrollee contact information and flags members who are appropriate for receiving CP supports;
- shares reports including risk stratification, care management, quality, and utilization data with practice sites;
- practice sites report that when members are receiving care coordination and management services from more than one program or person, these resources typically operate together efficiently.

✓ Clinical integration among ACO member organizations and with CPs

 deploys shared team models for care management, locating ACO staff at practice sites, and providing both role-specific and process-oriented training for staff at practice sites;

- enables PCP access to all member clinical information through an EHR; and sites are able to access results of screenings performed by the ACO;
- co-locates BH resources and primary care where appropriate.

√ Joint management of performance and quality

- articulates a clear and reasoned plan for quality management that jointly engages practice sites and ACO staff, and explicitly incorporates specific quality metrics;
- dedicates a clinician leadership role and ACO staff to reviewing performance data, identifying performance opportunities, and implementing associated change initiatives in cooperation with providers.

✓ ACO/MCO coordination (at Accountable Care Partnership Plans)

- shares administrative and clinical data between ACO and MCO entities, and circulates regular reports including population health and cost-of-care analysis;
- is coordinated by a Joint Operating Committee for alignment of MCO and ACO activities, which manages clinical integration and is planning transitions of functions from MCO to ACO over time.

Results

The IA finds that BMCHP Mercy is **On track with no recommendations** in the Integration of Systems and Processes focus area.

Administrative coordination among ACO member organizations and with CPs

BMCHP Mercy identifies members that could enroll in or are receiving CP services using a patient identification algorithm developed by a BH services CP. BMCHP Mercy and this BH services CP circulate updated enrollee contact lists to practice sites. Centralized ACO staff perform patient outreach with these contact lists. BMCHP Mercy shares high-risk patient lists and total cost of care (TCOC) information with frontline population health staff at practice sites through an electronic population health platform.

BMCHP Mercy runs a universal registry which identifies patient cohorts for risk stratification analysis. Boston Medical Center Health System (BMCHS), a corporate member of the BMCHP MCO, then stratifies members for potential care management intervention using a risk adjusted future cost of care algorithm. BMCHP Mercy circulates this risk-adjusted list of members to care managers at practice sites, emergency departments (EDs), ambulatory clinics and hospitals so they can engage the high-risk members. BMCHP Mercy quality specialists provide patient information to CPs and incorporate the CPs into member care plans.

Results from the ACO Practice Site Administrator Survey indicate that the majority of practice sites felt that members receiving care coordination and management services from multiple programs felt that these resources "usually or always" operated together efficiently.

Clinical integration among ACO member organizations and with CPs

BMCHP Mercy uses a shared team model for care management, embedding their care management staff at primary care practice sites. Care management teams include an RN and a community health worker at each practice site. Additional members of the BMCHP Mercy care management team that serve as a shared resource to the seven practice sites include a clinical manager who oversees complex care management staff, two pharmacists, behavioral health clinical social workers and a coordinator who helps place individuals and families identified as housing unstable. A BMCHP Mercy

quality specialist serves as a single point of contact between the ACO and CPs to efficiently generate care plans and transfer relevant patient information from the EHR.

BMCHP Mercy reports providing numerous role-specific and process-oriented trainings for care management teams at practice sites. Care management staff meet to review their active panel on a weekly basis and every other week multi-disciplinary staff participate in a conference to discuss the most complex cases. Managers provide personalized feedback to care management staff at weekly meetings. Additionally, care management staff participate in monthly resiliency trainings to promote team building and provide emotional support. BMCHP Mercy hosts an all staff meeting to review care management protocols and workflows and train staff on use of the care management software platform. BMCHP Mercy also plans to send CHW supervisors to trainings supported by DSRIP statewide investments.

BMCHP Mercy staff and clinicians have access to member information through many sources. BMCHP Mercy has begun using a population analytics platform to target interventions based on utilization and process improvement opportunities. The analytics platform aggregates patient information from multiple EHRs used across the ACO and its partners. BMCHP Mercy has also implemented a care management software across all practice sites. Care management staff use this software to document interactions with members and nurses use it to track care assignments and patient progress. Almost all practice sites in the ACO are using the same EHR to access member clinical information, but three EHR systems are still in use across the system.

BMCHP Mercy embedded behavioral health complex care management teams at primary care practice sites. These teams consist of an RN, CHW and a behavioral health specialist who address a patient's behavioral health and health-related social needs (HRSN). The ACO's Community Health and Well-Being program has long established relationships with CPs and provides additional support to manage the behavioral health needs of the member population. BMCHP Mercy intends to utilize the Community Health and Well-Being Program's extensive experience in community engagement to further integrate CPs into its programs. Community Health and Well Being staff participate in the ACO steering committee and developed the operational strategy and goals for interfacing with CP partners.

Joint management of performance and quality

BMCHP Mercy regionalized their population health strategy after they joined Trinity Health of New England Medical Group. After this merger, the ACO founded a tiered CIN to bring regional population health management expertise under one arm. The CINs are designed as physician hospital organizations (PHOs) with equal physician and administrative representation.

Staff from local and regional CIN are tasked with identifying performance improvement opportunities and implementing associated change initiatives in cooperation with providers. A physician leads each local CIN along with an administrative dyad. The regional CIN supports local CINs, eliciting feedback from frontline staff on improvement opportunities. Local CIN staff report financial performance, quality and patient experience data to the regional CINs. Regional CINs report back the same metrics aggregated at the regional level. The regional CIN management team and the regional CIN Board of Directors determine the improvement strategy for the region.

BMCHP Mercy hired two quality specialists to assist with improvement initiatives at physician practices. Quality specialists monitor member data and flag those due for preventive services to help practice sites close quality gaps in those metrics. In addition to monitoring preventive care quality measures, BMCHP Mercy reported monitoring metrics related to many other focus areas including but not limited to clinical care, utilization, and internal data analytics capacity.

ACO/MCO coordination (at Accountable Care Partnership Plans)

Mercy's JOC is a governing board equally divided between Mercy and BMCHP representatives. The JOC approves budgets, oversees performance related to cost and quality, provides guidance and recommendations on the need for additional provider participants, and shares stakeholder input on opportunities for collaboration with pharmacy, behavioral health, and CPs.

BMCHP and Mercy jointly rolled out a population health platform to develop data analytics capabilities that deliver actionable information to drive quality improvement and TCOC initiatives. This platform enables Mercy staff to review patient utilization data, claims and complex member needs. Additionally, BMCHS provides the technical capacity to manage and develop risk stratification algorithms to predict a member's future TCOC. BMCHP Mercy runs a universal registry that identifies condition specific patient cohorts. The lists of members in these cohorts are run through the BMCHS algorithms to create risk adjusted lists of members for high-risk care managers. Mercy and BMCHP then work together to identify and coordinate care for members at all levels of the risk-strata, with a focus on the highest risk members. BMCHP Mercy routinely communicates risk stratification reports to senior administrative and strategic team members overseeing workflows.

Recommendations

The IA has no recommendations for the Integration of Systems and Processes focus area.

Promising practices that ACOs have found useful in this area include:

Administrative coordination among ACO member organizations and with CPs

- o establishing weekly meetings to discuss newly engaged members.
- establishing monthly meetings with practices sites and CPs to discuss member care plans.
- creating a case review process including care coordination, service gaps and service duplication.
- sharing member risk stratification reports including results of predictive modeling.

✓ Clinical Integration among ACO member organizations and with CPs

- designating a practice site champion responsible for integrating Care Coordination and Care Management (CCCM) and clinical care plans.
- embedding CCCM staff at practice sites to participate in shared model for care management.
- providing resiliency training to CCCM staff to improve team cohesion and offer emotional support.
- developing a centralized care management office to support member care teams in conducting needs assessment, follow-up, disease management and transitions of care.
- o following members for at least 30 days post-discharge from the hospital.
- providing laptops or other devices that enable EHR access by off-site providers during visits with members.
- holding monthly meetings of CCCM teams to share best practices, develop solutions to recent challenges and provide collegial support.

√ Joint management of performance and quality

- developing practice site specific quality scorecards and reviewing them at monthly or quarterly meetings.
- having the Joint Operating Committee (JOC) review scorecards of clinical, quality, and financial measures.
- sharing individual performance reports containing benchmarks or practice wide comparisons with providers.

✓ ACO/MCO coordination (at Accountable Care Partnership Plans)

- o reviewing performance and quality outcomes at regular governance meetings.
- developing coordinated goals related to operations, budget decisions and clinical quality outcomes

3. WORKFORCE DEVELOPMENT

On Track Description

Characteristics of ACOs considered On track:

✓ Recruitment and retention

- successfully hired staff for care coordination and population health, leaving no persistent vacancies:
- uses a variety of mechanisms to attract and retain a diverse team, such as opportunities for career development, educational assistance, ongoing licensing and credentialing, loan forgiveness and leadership training.

✓ Training

- offers training to staff, including role-specific topics such as integrating primary care, behavioral health, health-related social needs screening and management, motivational interviewing, and trauma-informed care;
- has established policies and procedures to ensure that staff meet the contractual training requirements, and holds ongoing, regularly scheduled, training to ensure that staff are kept up to date on best practices and advances in the field as well as refreshing their existing knowledge.

√ Teams and staff roles designed to support person-centered care delivery and population health

- hires nonclinical staff such as CHWs, navigators, and recovery peers, and deploy them as part of interdisciplinary care delivery teams including CCCM staff, medical providers, social workers and BH clinicians;
- deploys clinical staff in population health roles and nontraditional settings and trains a variety of staff to provide services in homes or other nonclinical settings.

Results

The IA finds that BMCHP Mercy is **On track with limited recommendations** in the Workforce Development focus area.

Recruitment and retention

BMCHP Mercy implemented recruiting and retention strategies that appear to be mitigating persistent vacancies. BMCHP Mercy sources most candidates through targeted outreach efforts at professional and trade schools. Internal networks are also used to advertise positions, and employees are offered referral bonuses to catalyze the recruiting process.

BMCHP Mercy uses a variety of mechanisms to retain its staff. Retention methods include appointing Local Group and Clinical Champions to serve for instance, as primary points of contact during onboarding of CCCM teams at practice sites. The ACO additionally attempts to ease issues typically associated with onboarding by aligning starting dates of multiple individuals on the same day to develop cohorts. The ACO also uses peer to peer systems which match new members of CCCM teams with more experienced members for assistance with onboarding and learning to improve retention rates.

BMCHP Mercy also reports that retention efforts are bolstered by providing regular feedback on performance through one-on-one check-ins with managers, monthly resiliency meetings for emotional support and team building, and daily huddles to manage and balance workloads for complex teams like CCCM.

Training

BMCHP Mercy has reported that it provides training opportunities to its staff and continues to develop additional job-specific training options across the ACO. The ACO also reports it has recently focused training development on team-building skills, and shared accountability for patient panels with additional role-specific training options under consideration.

Staff feedback was cited as the primary means through which BMCHP Mercy informs its perceived training needs and updates current training programs. The ACO reportedly conducted a CCCM pilot program to assist in developing hospital-based onboarding plans and inform larger workforce training strategies. Pilot teams were consulted to better understand essential skills for success, supports needed, and to identify priorities for desired future trainings.

BMCHP Mercy also reports that one-on-one supplemental training is conducted through the use of Local and Clinical Champions assisting junior staff with site-specific insights on workflows and existing team structures.

Teams and staff roles designed to support person-centered care delivery and population health

BMCHP Mercy supports patient-centered care delivery goals through the inclusion of CHWs, care navigators, recovery peers, and social workers across multiple clinical settings within the ACO. Patient-facing CCCM teams include one registered nurse (RN) care manager and one CHW. Nurse care managers are responsible for managing patient care plans and focus on utilization management and managing care transitions across all settings. CHWs provide social and informational support to high-risk members across multiple settings including home, community, primary, and specialty care clinics. CHWs also focus on addressing HRSNs, including food insecurity, transportation⁸, housing, and safety, and conduct patient outreach and engagement.

BMCHP Mercy also pairs RNs with CHWs across their EDs, supported by pharmacy team members.

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⁸ ACOs should first utilize MassHealth Transportation (PT-1) for members as appropriate.

Recommendations

The IA encourages the BMCHP Mercy to review its practices in the following aspects of the Workforce Development focus area, for which the IA did not identify sufficient documentation to assess progress:

- pursuing additional employee retention efforts specific to educational assistance, leadership training, ongoing licensing and credentialing, or loan forgiveness; and
- using a variety of mechanisms to attract and retain a diverse team.

Promising practices that ACOs have found useful in this area include:

Promoting diversity in the workplace

- compensating staff with bilingual capabilities at a higher rate.
- establishing a Diversity and Inclusion Committee to assist HR with recruiting diverse candidates.
- advertising in publications tailored to non-English speaking populations.
- attending minority focused career fairs.
- o recruiting from diversity-driven college career organizations.
- tracking the demographic, cultural, and epidemiological profile of the service population to inform hiring objectives.
- implementing an employee referral incentive program to leverage existing bilingual and POC CP staff's professional networks for recruiting.
- advertising positions with local professional and civic associations such as the National Association of Social Work, Spanish Nurses Association, Health Care Administrators, National Association of Puerto Rican and the Hispanic Social Workers.
- recruiting in other geographic areas with high concentrations of Spanish speakers or other needed language skills, and then helping qualified recruits with relocation expenses.

✓ Recruitment and retention

- o contracting with a local social services agency capable of providing the ACO with short term CHWs, enabling the ACO to rapidly increase staff on an as-needed basis.
- onboarding cohorts of new CCCM staff with common start dates, enabling shared learning.
- o implementing mentorship programs that pair newly onboarded staff with senior members to expedite training, especially amongst CCCM teams with complex labor divisions.
- providing opportunities for a staff voice in governance through regularly scheduled leadership town halls at individual practice sites.
- recruiting staff from professional associations, such as the Case Management Society of America, and from targeted colleges and universities.
- o offering staff tuition reimbursement for advanced degrees and programs.

o using employee referral bonuses to boost recruitment.

✓ Training

- offering staff reimbursement for training from third party vendors.
- tracking staff engagement with training modules and proactively identifying staff who have not completed required trainings.
- providing additional training opportunities through on-line training programs from third party vendors.
- o offering Medical Interpreter Training to eligible staff.
- sponsoring staff visits to out of state health systems to learn best practices and bring these back to the team through peer-to-peer trainings.

Teams and staff roles designed to support person-centered care delivery and population health

- o protecting provider time for pre-visit planning.
- pairing RN care managers or social workers with CHWs to provide care coordination.
- o including pharmacists/pharmacy technicians and dieticians on care teams.
- o developing trainings and protocols for staff providing home visits.
- developing trainings and protocols for staff using telemedicine.
- leveraging CHWs who specialize in overcoming barriers to engagement, including issues of distrust of the medical community, to build relationships with hard-to-engage members.

4. HEALTH INFORMATION TECHNOLOGY AND EXCHANGE

On Track Description

Characteristics of ACOs considered On track:

✓ Infrastructure for care coordination and population health

- uses an EHR to aggregate and share information among providers across the ACO
- has a care management platform in place to facilitate collaborative patient care across disciplines and providers;
- uses a population health platform that integrates claims, administrative, and clinical data, generates registries by condition or risk factors, predictive models, utilization patterns, and financial metrics, and identifies members eligible for programs or in need of additional care coordination.

√ Systems for collaboration across organizations

- o has taken steps to improve the interoperability of their EHR;
- shares real-time data including event notifications, and uses dashboards to share real time program eligibility and performance data;
- creates processes to enable two-way exchange of member information with CPs and develops workarounds to solve interoperability challenges.

Results

The IA finds that BMCHP Mercy is **On track with limited recommendations** in the Health Information Technology and Exchange focus area.

Mercy has three EHR systems in place and is working to improve the interoperability of the EHR systems by moving to one EHR across sites. BMCHP Mercy reports that data integration is not seamless and requires the use of a third-party analytics platform. The ACO is currently focused on two primary interoperability goals, data aggregation and member risk stratification. The centralized analytics platform currently aggregates the data from all EHRs and this aggregate data is available to all primary care providers (PCPs) via the analytics platform. The analytics platform also stratifies members by risk and serves as the main population health platform.

Boston Medical Center Health System (BMCHS) provides support for stratifying members by risk and developed a scoring system to stratify members by risk for TCOC.TCOC. BMCHP runs the universal registry which identifies member cohorts. BMCHS uses an analytics-based platform to implement the algorithms. The platform uptakes EHR/claims data and runs risk algorithms, developing risk adjusted lists of members for care management interventions. This list is then circulated to the care management platform where high-risk care managers at practice sites, in emergency departments, and hospitals can access and then engage members. A similar effort is also being made at ambulatory sites to target the top three percent of high-risk members.

BMCHP Mercy uses a separate care management platform that is accessible to all care managers. Data from the analytics platform is also integrated here, and care managers can use the care management platform to identify high-risk or complex-needs members they manage. This care management platform also receives real time notifications when a member is admitted to a hospital, ED, or a skilled nursing facility.

Systems for collaboration across organizations

For real-time event notifications, BMCHP Mercy uses the Massachusetts eHealth Collaborative (MAeHC).). They receive event notifications when a member is admitted to hospital, ED, or a skilled nursing facility via an event notification network.

BMCHP Mercy has full access to Admission, Discharge, and Transfer (ADT) feeds and real-time event notification, but participating PCP sites are unable to access this data and the ACO is unable to incorporate this data into their population health analytics technology.

BMCHP Mercy is only able to share and/or receive electronic member contact information, comprehensive needs assessments and care plans through secure and compliant means with their managed care plan. Due to an EHR rollout across the health system, this same information is unavailable electronically to most, if any, of their participating PCP sites, participating specialists and non-affiliated providers. BMCHP Mercy relies on patient identification algorithms to identify members for CP referral then has central staff perform outreach. The ACO can electronically share and/or receive comprehensive needs assessments and care plans with most CPs.

A majority of BMCHP Mercy practice sites agree or strongly agree that EHRs improve their ability to coordinate care for MassHealth members and all BMCHP Mercy sites agree or strongly agree that population and care management platforms improve their ability to coordinate care for MassHealth members (Figure 2).

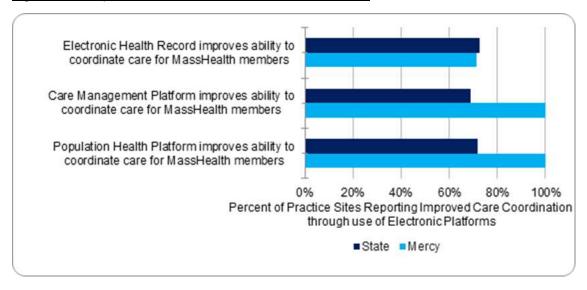


Figure 2. Perceptions of HIT Platforms for Care Coordination

Number of Practices Reporting in the State, N = 225Number of Practices Reporting in MERCY, N = 7

Figure displays responses to Q13_EHR, Q13_CMP, Q13_PHP. To what extent do you agree that the Electronic Health Record/ Care Management Platform/Population Health Platform improves your ability to coordinate care for your MassHealth members?

Recommendations

The IA encourages BMCHP Mercy to review its practices in the following aspects of the Health Information Technology and Exchange focus area, for which the IA did not identify sufficient documentation to assess progress:

 developing system integration (after EHR integration) which allows for the electronic transmission of Member contact information, comprehensive needs assessments and care plans to/from affiliated and non-affiliated providers.

Promising practices that ACOs have found useful in this area include:

✓ Infrastructure for care coordination and population health

- leveraging EHR integrated care management and population health platforms.
- o automating risk stratification to identify high-risk, high-need members.
- o developing HIT training for all providers as part of an on-boarding plan.
- incorporating meta-data tagging into care management platforms to allow supervisors to monitor workflow progress.
- conducting ongoing review and evaluation of risk stratification algorithms to improve algorithms and refine the ACO's approach to identifying members at risk who could benefit from PHM programs.

✓ Systems for collaboration across organizations

establishing EHR portals that allow members to engage with their chart and their care teams.

- providing EHR access through a web portal for affiliated providers, CPs or other entities whose EHR platforms are not integrated with the ACOs EHR.
- developing methods to aggregate data from practice sites across the ACO; particularly if sites use different EHRs.
- pushing ADT feeds to care managers in real time to mitigate avoidable ED visits and/or admissions.
- developing continuously refreshing dashboards to share real-time program eligibility and performance data.

5. CARE COORDINATION AND CARE MANAGEMENT

On Track Description

Characteristics of ACOs considered On track:

√ Full continuum collaboration

- collaborates with state agencies such as DMH;
- has established processes for identifying members eligible for BH or LTSS services and collaborating with CPs, including exchanging member information, and collaborating for care coordination when CP has primary care management responsibility;
- o designates a point of contact for CPs to facilitate communication;
- o incorporates social workers into care management teams and integrates BH services, including Office-Based Addiction Treatment (OBAT), into primary care.

√ Member outreach and engagement

- uses both IT solutions and manual outreach to improve accuracy of member contact information;
- uses a variety of methods to contact assigned members who cannot be reached telephonically by going to members' homes or to community locations where they might locate the individual (e.g. a congregate meal site);
- addresses language barriers through steps such as translating member-facing materials, providing translators for appointments, and recruiting CCCM staff who speak members' languages;
- supports members who lack reliable transportation by providing rides or vouchers⁹, and/or providing services in homes or other convenient community settings;

✓ Connection with navigation and care management services

- locates CCCM staff in or near EDs;
- enables staff to build 1:1 relationships with high-need members, and uses telemedicine, secure messaging, and regular telephone calls for ongoing follow-up with members;

⁹ ACOs should utilize MassHealth Transportation (PT-1) for member needs first as appropriate.

- provides members with 24/7 access to health education and nurse coaching, through a hotline or live chat:
- implements best practices for transitions of care, including warm handoffs between transition of care teams and ACO team;
- implements processes to direct members to the most appropriate care setting, including processes to re-direct members to primary care to reduce avoidable emergency department visits;

√ Referrals and follow-up

- standardizes processes for referrals for BH, LTSS, and health-related social needs (HRSN), and ability to systematically track referrals, enabling PCPs and care coordinators to confirm that a member received a service, incorporate results into the EHR and care plan;
- conducts regular case conferences to coordinate services when a member has been referred.

Results

The IA finds that BMCHP Mercy is **On track with limited recommendations** in the Care Coordination and Care Management focus area.

Full continuum collaboration

BMCHP Mercy's care management team is collaborating with state agencies. The ACO partnered with a private BH services company with expertise running patient identification algorithms to identify members appropriate for referral to BH or LTSS CP services. BMCHP Mercy then designates central staff to perform outreach for CP referral for potential enrollees identified through this algorithm. The ACO integrated social workers across all primary care sites, with two of those social workers serving as BH resources for the primary care teams.

BMCHP Mercy uses a quality specialist as a primary point of contact for access and data transfer and has designated a leadership position to be a primary contact for organizational relationship issues. The ACO also utilizes its Community Health and Well-Being Program's established relationships to further facilitate communication and integration with CPs. For members who enroll in both CCCM and CP services, the CP is primarily responsible for coordination of services while the CCCM team is responsible for care coordination. CP and CCCM staff participate in care planning meetings and regular communications about CP-engaged members. CPs and providers make referrals to the BMCHP Mercy's Complex Care Management program, and eligibility for the program is reviewed by the ACO's care management leadership.

Member outreach and engagement

Community health workers are a primary part of the BMCHP Mercy's member engagement strategy. Specifically, community health workers at the ACO focus on addressing the social determinants of health and barriers to care including food insecurity, transportation¹⁰, housing, and safety. Community health workers also work with high-risk primary care members telephonically and in diverse settings such as their homes, the community, specialty clinics, and primary care clinics; to provide social support and information.

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¹⁰ ACOs should first utilize MassHealth Transportation (PT-1) for members as appropriate.

BMCHP Mercy enrolls members in care management during visits to the ED, at discharge, in primary care settings and through CP referrals. The ACO utilizes all member touchpoints with care management staff as an opportunity to confirm member contact information. For example, a behavioral health CP manages member enrollment and works telephonically to engage members in the BH CP program. In addition, the MCO, along with this BH services CP, supports enrollment and outreach to members.

BMCHP Mercy provides home-based care and uses peer support and/or CHWs to provide supports and services.

Connection with navigation and care management services

Primary navigation and care management services are provided by nurse care managers and CHWs at BMCHP Mercy. While the majority of clinical care management services are performed by nurse care managers, CHWs also provide social and informational support to high-risk primary care members in multiple settings including home, community, Primary Care clinic, and specialty clinics. A dyad consisting of the nurse care manager and the CHW develop close relationships with members and work together to manage the member's care plan and address social determinants of health.

Nurse care managers manage transitions of care by visiting members who are admitted to a facility and/or in the ED to conduct post-discharge outreach and medication reconciliation and ensure appropriate clinical referrals are established for follow-up in primary care settings. Nurse care managers provide chronic disease management support including self-management support, referral for home health care, and regular member monitoring. Nurse care managers also work with nurse practitioners to perform medication titration as needed. In addition, nurse care managers provide navigation services, assist members with self-advocacy, deliver member education and conduct telephonic health needs screening.

In the ED, a nurse care manager is paired with a community health worker/patient navigator to help direct care for ACO members. Other BMCHP Mercy staff in the ED include a licensed social worker providing education, counseling, and referrals to care as well as a care manager providing care management to the top three percent of identified high-risk members and to transition members to ambulatory care managers at discharge. The complex care manager will provide outreach and coordination on high end utilizers of emergency services.

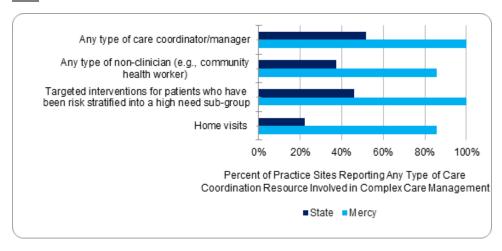
BMCHP Mercy ensures enrollment lists are shared between primary care complex care management and the health plan's transitions of care program. Nurse care managers and community health workers work closely to provide these services. Nurses also manage transitions of care, and a telephonic team performs transitions of care phone calls for ACO members not currently enrolled in CCCM. A majority of BMCHP Mercy sites report that CCCM resources, such as any type of non-clinician, and home visits are often or always involved in helping complex high-need MassHealth members adhere to the care plan. All BMCHP Mercy sites report that targeted interventions for members who have been risk stratified into a high need sub-group, are often or always involved in helping complex high-need MassHealth members adhere to the care plan (Figure 3).

BMCHP Mercy offers several programs via telemedicine. Processes to direct members to the most appropriate care setting are generally managed by patient navigators and community health workers, but the Readmissions Care Team (RCT) also works with members to reduce non-urgent ED usage. One of the ACO's DSRIP goals is to develop an ED Care Management Program to reduce avoidable ED visits and admissions and lower costs by five percent over five years compared to baseline. BMCHP Mercy, working with its Readmissions Care Team (RCT), has embedded teams not only in primary care but also in emergency departments and inpatient facilities across the network. CCCM staff (RNs) visit members in the ED and in inpatient settings. BMCHP Mercy invested in ambulatory pharmacy staff and embedded care teams at primary care sites in an effort to reduce ED utilization, inpatient utilization and readmissions.

Referrals and follow-up

CPs and providers can make referrals into the CP program, and the CP reviews the referral for appropriateness. CPs and providers are also able to refer members to BMCHP Mercy's complex care management program. Eligibility for the program is reviewed by care management leadership after CP provider referral.

<u>Figure 3. Care Coordination Resources Involved in Helping High-Need Members Adhere to the Care Plan</u>



Number of Practices Reporting in the State, N = 225

Number of Practices Reporting in MERCY, N = 7

Figure displays responses to Q6. For your complex high-need MassHealth patients, how often is any type of care coordination or management resource involved in helping the patient adhere to the care plan?

Statistical significance testing was not done due to small sample size.

Recommendations

The IA encourages BMCHP Mercy to review its practices in the following aspects of the Care Coordination and Care Management focus area, for which the IA did not identify sufficient documentation to assess progress:

- taking steps such as translating member-facing materials, providing translators for appointments, and hiring CCCM staff who speak members' languages to improve care coordination and management for members whose may not be fluent in English;
- supporting members who lack reliable transportation by providing rides or vouchers¹¹, and/or providing services in homes or other convenient community settings;
- increasing standardization of processes for connecting members to social services where applicable; and
- conducting regular case conferences to coordinate services when a member has been referred.

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¹¹ ACOs should first utilize MassHealth Transportation (PT-1) for members as appropriate.

Promising practices that ACOs have found useful in this area include:

✓ Full continuum collaboration

- establishing a systematic documentation process to track members receiving care coordination from CPs.
- matching members based on their needs to interdisciplinary care coordination teams that include representatives from primary care, nursing, social work, pharmacy, community health workers and behavioral health.
- expanding BH integration through multiple strategies, including embedding staff in primary care sites, reverse integration of physical health care at BH sites, and telehealth.
- o increasing two-way sharing of information between ACOs and CPs.
- leveraging EHR-integrated tools to flag members requiring a higher level of care coordination.
- coordinating with government agencies and community organizations to enhance care coordination and avoid duplication for members receiving other services.
- supporting families of pediatric members by offering to have care managers work with school-based personnel to address health or disability related needs identified in the Individualized Education Program.

✓ Member outreach and engagement

- o developing a high-intensity program for extremely high-need, high-risk members with strategically low case load.
- establishing trust between members and CCCM staff by building and maintaining a 1:1 consistent relationship.
- creating a mobile phone lending program for hard-to-reach members, particularly those experiencing housing instability.¹²
- embedding CCCM staff in EDs.
- o creating a "Navigation Center" to manage referrals outside the ACO, handle appointment scheduling, and coordinate testing, follow-up, and documentation transfers.
- developing an assistance fund to support transportation vouchers¹³ and low-cost cell phones.¹⁴

✓ Connection with navigation and care management services

- o utilizing EHR-based documentation transfer during warm handoffs.
- establishing daily or weekly care management huddles that connect PCPs and CCCM teams and streamline care transitions.

¹² ACOs should first utilize Lifeline program for members as appropriate

¹³ ACOs should utilize MassHealth Transportation (PT-1) for member needs first as appropriate.

¹⁴ ACOs should first utilize Lifeline program for members as appropriate.

✓ Referrals and follow-up

- utilizing EHR messaging tools to better describe the purpose of specialty consults and a plan for follow-up communication.
- automating referral tracking and management, using flags to prompt referrals, linked directories to suggest appropriate providers and services, notifications to care managers when referral results are available, and databases allowing care teams to easily identify follow-up needs.

6. POPULATION HEALTH MANAGEMENT

On Track Description

Characteristics of ACOs considered On track:

√ Integration of health-related social needs

- standardizes screening for health-related social needs (HRSN) that includes housing, food, and transportation;
- incorporates HRSN with other factors to target members for more intensive services;
- Builds mature partnerships with community-based organizations to whom they can refer members for services
- has a plan approved for provision of flexible services;

√ Population health analysis

- articulates a coherent strategy for stratifying members to service intensity and use of a
 population health analysis platform to combine varied data sources, develop registries of
 high-risk members, and stratify members at the ACO level.
- integrates cost data into reports given regularly to providers to facilitate cost-of-care management.

✓ Program development informed by population health analysis

- offers PHM programs that target all eligible members (not just facility-specific), and target members by medical diagnosis, BH needs (including non-CP eligible), HRSNs, care transitions;
- offer interactive wellness programs such as smoking cessation, diet/weight management.

Results

The IA finds that BMCHP Mercy is **On track with no recommendations** in the Population Health Management focus area.

Integration of health-related social needs

BMCHP Mercy conducts HRSN and Social Determinants of Health screening on all members. Regardless of risk, members are referred to a community health worker or a member of the Community Wellness team to address the needs of members based on the risk score. Results from the practice site survey indicate that the ACO regularly conducts HRSN screening for tobacco use, depression, substance use, polypharmacy, housing instability, utility needs, interpersonal violence, transportation needs, and Medicaid eligibility (Figure 4).

BMCHP Mercy incorporates HRSN with other factors to target members for more intensive services. This responsibility is handled by the community health workers, who address social determinants of health, such as housing instability, food insecurity, transportation¹⁵, and safety, but the ACO's Community Health and Wellbeing Program, as well as mature partnerships with community organizations, also help with health-related social needs services. Partnerships with community-based organizations in the greater Springfield area include food pantries, transitional housing, emergency shelters, and mental health services. BMCHP Mercy also recently hired a Homeless Coordinator who has helped to house twenty-two individuals.

BMCHP Mercy has received approval for their plan for provision of flexible services.

Tobacco use Opioid use Substance use Polypharmacy Depression Low health literacy Food security or SNAP eligibility Housing instability Utility needs Interpersonal violence Transportation needs Need for financial assistance with medical bills Medicaid eligibility 0% 20% 40% 60% 80% 100% Percent of Practice Sites Reporting Screening ■ State ■ BMCHP Mercy

Figure 4. Prevalence of Screening for social and other needs at Practice Sites

Number of Practices Reporting in the State, N = 225Number of Practices Reporting in MERCY, N = 7

Figure displays responses to Q14. For which of the following are MassHealth members in your practice systematically screened? Select if screening takes place at any level (Managed Care Organization, Accountable Care Organization, Practice, CP)

Statistical significance testing was not done due to small sample size.

Population health analysis

The BMC Health System developed a scoring system to stratify members by risk for future TCOC using EHR data and/or an EHR based risk algorithm or using paid claims and a claims-based algorithm, with preferential use of the EHR data over claims where possible at individual ACO or practice sites. Members that score in the top two percent of the scoring system are eligible for primary care embedded complex care management as well as non-complex care management programs such as ED care management and programs run by the readmissions care team. BMC also used hospital readmission and length of stay data to define eighty-three potential contributing factors to member risk and high utilization, such as member demographics, diagnosis, medication, encounter types, and total charges. BMCHP Mercy has conducted statistical testing to evaluate the

¹⁵ ACOs should first utilize MassHealth Transportation (PT-1) for members as appropriate.

effectiveness of the algorithm to make sure that the MassHealth ACO pilot data holds for the assigned ACO population.

One of BMCHP Mercy's DSRIP goals is to improve data and analytics capabilities to deliver actionable information regarding quality outcomes and TCOC. In 2019, the ACO reported successfully implementing a clinical informatics platform to evaluate the successes of interventions as well as opportunities for any new programs. BMCHP Mercy uses the data to identify high utilizers and TCOC patterns. The ACO also plans to create a new ambulatory SUD program to help with TCOC and improve performance.

Program development informed by population health analysis

BMCHP Mercy offers programs informed by population health and TCOC analysis. Serving both the adult and pediatric populations, these programs aim to reduce uncoordinated care, improve quality of life, and reduce ED and inpatient visits/admissions. The ACO also conducts wellness and HRSN programs such as nutrition classes, health literacy and education, online wellness tools, childbirth classes, support for housing instability, and social support and psychotherapy.

Recommendations

The IA has no recommendations for the Population Health Management focus area.

Promising practices that ACOs have found useful in this area include:

✓ Integration of health-related social needs

- implementing universal HRSN screening in all primary care sites and behavioral health outpatient sites.
- using screening tools designed to identify members with high BH and LTSS needs.
- using root-cause analysis to identify underlying HRSNs or unmet BH needs that may be driving frequent ED utilization or readmissions.
- partnering with local fresh produce vendors, mobile grocery markets, and food banks to provide members with access to healthy meals.
- o providing a meal delivery service, including medically tailored meals, for members who are not able to shop for or prepare meals.
- organizing a cross-functional committee to understand and address the impact of homelessness on members' health care needs and utilization.
- enabling members and CCCM field staff to document HRSN screenings in the EHR using tablet devices with a secure web-based electronic platform.
- o automating referrals to community agencies in the EHR/care management platform.

✓ Population health analysis

- developing and utilizing condition-specific dashboard reports for performance monitoring that include ED and hospital utilization and total medical expense.
- developing key performance indicator (KPI) dashboards, viewable by providers, that track financial and operational metrics and provide insights into patient demographics and how the population utilizes services.

- developing a registry or roster that includes cost and utilization information from primary care and specialty services for primary care teams and ACO leadership to better serve MassHealth ACO members.
- implementing single sign-on and query capability into the online Prescription Monitoring Program, so that providers can quickly access and monitor past opioid prescriptions to promote safe opioid prescribing.

✓ Program development informed by population health analysis

- engaging top level ACO leadership in design and oversight of PHM strategy.
- developing methods to assess members' impactibility as well as their risk, so that programs can be tailored for and targeted to the members most likely to benefit.
- developing services that increase access to real-time BH care, such as a SUD urgent care center.
- o developing programs that address BH needs and housing instability concurrently.
- offering SUD programs tailored to subgroups such as pregnant members, LGBT members, and members involved with the criminal justice system allowing the care team to specialize in helping these vulnerable populations.
- o providing education at practice sites or community locations such as:
 - medication workshops that cover over-the-counter and prescription medication side effects, how to take medications, knowing what a medication is for, and identifying concerns to share with the doctor.
 - expectant parenting classes that cover preparation for childbirth, breastfeeding, siblings, newborn care, and child safety.
 - cooking classes that offer recipes for healthy and cost-effective meals.
- offering items that support family health such as:
 - free diapers for members who have delivered a baby as an incentive to keep a postpartum appointment within 1-12 weeks after delivery.
 - car seats, booster seats, and bike helmets.
 - dental kits.

OVERALL FINDINGS AND RECOMMENDATIONS

The IA finds that BMCHP Mercy is On track or On track with limited recommendations across all six focus areas of progress under assessment at the midpoint of the DSRIP Demonstration. No recommendations are provided in the following focus areas:

- Organizational Structure and Engagement
- Integration of Systems and Processes
- Population Health Management

The IA recommends that BMCHP Mercy review its practices in the following aspects of the remaining three focus areas, for which the IA did not identify sufficient documentation to assess or confirm progress:

Workforce Development

- pursuing additional employee retention efforts specific to educational assistance, leadership training, ongoing licensing and credentialing, or loan forgiveness; and
- using a variety of mechanisms to attract and retain a diverse team.

Health Information Technology and Exchange

developing system integration (after EHR integration) which allows for the electronic transmission
of Member contact information, comprehensive needs assessments and care plans to/from
affiliated and non-affiliated providers.

Care Coordination and Care Management

- taking steps such as translating member-facing materials, providing translators for appointments, and hiring CCCM staff who speak members' languages to improve care coordination and management for members whose may not be fluent in English;
- supporting members who lack reliable transportation¹⁶ by providing rides or vouchers, and/or providing services in homes or other convenient community settings;
- increasing standardization of processes for connecting members to social services where applicable; and
- conducting regular case conferences to coordinate services when a member has been referred.

BMCHP Mercy should carefully self-assess the areas noted above, and consider the corresponding promising practices identified by the IA for each focus area. Any action taken in response to the recommendations must comply with contractual requirements and programmatic guidance.

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¹⁶ ACOs should first utilize MassHealth Transportation (PT-1) for members as appropriate.

APPENDIX I: MASSHEALTH DSRIP LOGIC MODEL

DSRIP Implementation Logic Model

A. INPUTS

- DSRIP funding for ACOS [\$1065M]
 DSRIP funding for
- BH CPs, LTSS CPs, and Community Service Agencies (CSAs) [\$547M] 3. State Operations
- & Implementation funding (DSRIP and other sources)
- DSRIP Statewide investments (SWIs) funding [\$115M]
- Internal ACO & CP program planning and investments

State Contest,

- Baseline performance, quality, cost trends
- flaseline medical/nonmedical service
- integration

 Baseline levels
 of workforce
 capacity
- Transformatio
 n readiness
- Baseline status and experience with alternative payment models (e.g., MSSP, BPCI, AQCI,
- Fayment & regulatory policy
- Safety Net.
 System
- Local, state, & national healthcare trends

B. OUTPUTS (Delivery System Changes at the Organization and State Level)

ACO, MCO, & CP/CSA ACTIONS SUPPORTING DELIVERY SYSTEM CHANGE INVITIAL PLANNING AND ONGOING IMPLEMENTATION!

ACO UNIQUE ACTIONS

- 1. ACOs established with specific governance, scope, scale, & leadership.
- ACOs engage providers (primary care and specialty) in delivery system change through financial (e.g. shared savings) and non-financial levers (e.g. data reports)
- ACDs recruit, train, and/or re-train administrative and provider staff by leveraging SWIs and other supports, education includes better understanding and utilization of BH and LTSS services
- ACOs develop HIT/HIE infrastructure and interoperability to support population health management (e.g. reporting, data analytics) and data exchange within and outside the ACO (e.g. CPs/CSAs, 8H, LTSS, and specially providers; social service delivery entities)
- 5. ACDs develop capabilities and strategies for non-CP-related population health management approaches, which includes risk stratification, needs screenings and assessments, and addressing the identified needs in the population via range of programs (e.g., disease management programs for chronic conditions, specific programs for co-occurring MH/9ND conditions)
- ACOs develop systems and structures to coordinate services across the care continuum (i.e. medical, Bit, ITSS, and social services), that align (i.e. are complementary) with services provided by other state agencies (e.g., Other).
- ACOs develop structures and processes for integration of health-related social needs into their PHM strategy, including management of fire services.
- ACOs develop strategies to reduce total cost of care (TCOC) is g. utilization management, referral
 management, non-CP complex care management programs, administrative cost reduction)
- MCOs in Partnership Plans (Model A's) increasingly transition care management responsibilities to their ACO Partners

CP/CSA UNIQUE ACTIONS

- 10 CPs established with specific governance, scope, scale, & leadership
- 11.CPs engage constituent entities in delivery system change through financial and non-financial levers
- 12.CPs/CSAs recruit, train, and/or re-train staff by leveraging SWIs and other supports
- 13.OPs/CSAs develop HIT/HIE infrastructure and interoperability to support provision of care coordination supports (e.g. reporting, data analytica) and data excharge within the CP (e.g. ACOs, MCOs, BH, LTSs, and specialty providents; so cals service delivery entities.)
- 14 CPs/CSAs develop systems and structures to coordinate services across the care continuum (i.e. medical, BH, LTSS, and social services), that align (i.e. are complementary) with services provided by other state agencies (e.g., DMH).

ACO, MCO, & CP/CSA COMMON ACTIONS

- ACOs, MCOs, & CPs/CSAs establish structures and processes to promote improved administrative coordination between organizations (e.g. enrollee assignment, engagement and outreach)
- 16.ACOs, MCOs, & CPs/CSAs establish structures and processes to promote improved clinical integration across organizations is g, administration of care management/coordination, recommendation for services)
- 17 ACOs, MCOs, & CPs/CSAs estabilish structures and processes for joint management of performance and quality, and conflict resolution

STATEWIDE INVESTMENTS ACTIONS

- 18.State develops and implements SWI initiatives aimed to increase amount and preparedness of community-based workforce available for ACOs & CPs/CSAs to hire and retain (e.g. expand residency and frontine extended workforce training programs.)
- 19 ACOs & CPs/CSAs leverage OSRIP technical assistance program to identify and implement best practices
- 20 Entitles leverage State financial support to prepare to enter APM arrangements.
- 21 State develops and implements SWI initiatives to reduce Emergency Department boarding, and to improve accessibility for members with disabilities and for whom English is not a primary language.

C. IMPROVED CARE PROCESSES (at the Member and Provider Level) AND WORKFORCE CAPACITY

IMPROVED IDENTIFICATION OF MEMBER NEED

- Members are identified through risk stratification for participation in Population Health Management (PHM) programs
- Improved identification of individual members' unmet needs (including SOH, 8H, and LTSS needs)

IMPROVED ACCESS

- Improved access to with physical care services (including pharmacy) for members
- 4. Improved access to with 8H services for members
- Improved access to with LTSS (i.e. both ACO/MCO-Covered and Mon-Covered services) for members

IMPROVED ENGAGEMENT

- Care management is closer to the member (e.g. care managers employed by or embedded at the ACO)
- Members meaningfully participate in PHM programs.

IMPROVED COMPLETION OF CARE PROCESSES

- Improved physical health processes (e.g., measures for wellness
 sevention, chronic disease management) for members
- 9. Improved 8H care processes for members
- 10. Improved LTSS care processes for members
- Members experience improved care transitions resulting from PHM programs
- Provider staff experience delivery system improvements related to care processes

IMPROVED CARE INTEGRATION

- Improved integration across physical care, 6H and LTSS providers for members
- Improved management of social needs through flexible services and/or other interventions for members
- Provider staff experience delivery system improvements related to care integration (including between staff at ACOs and CPs)

IMPROVED TOTAL COST OF CARE MANAGEMENT LEADING INDICATORS

16. More effective and efficient utilization indicating that the right care is being provided in the right setting at the right time [e.g. shifting from inpatient utilization to outpatient/community based UTSS, shifting more utilization to less-expensive community hospitals, restructuring of delivery system, such as through conversion of medical/surgical beds to psychiatric beds, or reduction in impatient capacity and increase in outpatient capacity.

IMPROVED STATE WORKFORCE CAPACITY

- 17. Increased preparedness of community-based workforce available
- 18. Increased community-based workforce capacity though more providers recruited or through more existing workforce retrained
- 19. Improved retention of community-based providers

D. IMPROVED PATIENT OUTCOMES AND MODERATED COST TRENDS

IMPROVED MEMBER OUTCOMES

- Improved member outcomes
- 2. Improved member experience

MODERATED COST TRENDS

 Moderated Medicaid cost trends for ACOenrolled population

PROGRAM SUSTAINABILITY

- Demonstrated
 sustainability of
 ACO models
- Demonstrated sustainability of CP model, including Enhanced LTSS model
- Demonstrated sustainability of flexible services model
- Increased acceptance of valuebased payment arrangements among MassHealth MCOs, ACOs, CPs, and providers, including specialists

APPENDIX II: METHODOLOGY

The Independent Assessor (IA) used participation plans, annual and semi-annual reports, survey responses, and key informant interviews (KIIs) to assess progress of Accountable Care Organizations¹⁷ (ACOs) towards the goals of DSRIP during the time period covered by the MPA, July 1, 2017 through December 31, 2019.

Progress was defined by the ACO actions listed in the detailed MassHealth DSRIP Logic Model (Appendix I), organized into a framework of six focus areas which are outlined below. This model was developed by MassHealth and the Independent Evaluator¹⁸ (IE) to tie together the implementation steps and the short- and long-term outcomes and goals of the program. It was summarized into a high-level logic model which is described in the CMS approved Massachusetts 1115 MassHealth Demonstration Evaluation Design document (https://www.mass.gov/doc/ma-independent-evaluation-design-1-31-19-0/download).

The question addressed by this assessment is:

To what extent has the ACO taken organizational level actions, across six areas of focus, to transform care delivery under an accountable and integrated care model?

DATA SOURCES

The MPA drew on multiple data sources to assess organizational performance in each focus area, including both historical data contained in the documents that ACOs were required to submit to MassHealth, and newly collected data gathered by the IA and/or IE. The IA performed a desk review of documents that ACOs were required to submit to MassHealth, including participation plans, annual and semi-annual reports. In addition, the IA developed and conducted an ACO Practice Site Administrator survey to investigate the practices and perceptions of participating primary care practices. The IE developed a protocol for ACO Administrator KIIs, which were conducted jointly by the IA and the IE.

List of MPA data sources:

Documents submitted by ACOs to MassHealth covering the reporting period of July 1, 2017 through December 31, 2019:

- Full Participation Plans (FPPs)
- Semi-annual and Annual Progress Reports (SPRs, APRs)
- Budgets and Budget Narratives (BBNs)

Newly Collected Data

- ACO Administrator KIIs
- ACO Practice Site Administrator Survey

¹⁷ See the ACO Background section for a description of the organization. In the case of a Model A ACO, an Accountable Care Partnership Plan, the assessment encompasses the partner managed care organization (MCO).

¹⁸ The Independent Evaluator (IE) – a distinct role separate from the Independent Assessor - is responsible for evaluating the outcomes of the Demonstration.

FOCUS AREA FRAMEWORK

The ACO MPA assessment findings cover six "focus areas" or aspects of health system transformation. These were derived from the DSRIP logic model, by grouping organizational level actions referenced in the logic model into the following domains:

- 1. Organizational Structure and Engagement
- 2. Integration of Systems and Processes
- 3. Workforce Development
- 4. Health Information Technology and Exchange
- 5. Care Coordination and Management
- 6. Population Health Management

Table 1 shows the ACO actions that correspond to each focus area. This framework was used to assess each ACO's progress. A rating of On track indicates that the ACO has made appropriate progress in accomplishing each of the actions for the focus area. Where gaps in progress were identified, the ACO was rated "On track with limited recommendations" or, in the case of more substantial gaps, "Opportunity for improvement."

Table 1. Framework for Organizational Assessment of ACOs

Focus Area	ACO Actions
Organizational Structure and Governance	 ACOs established with specific governance, scope, scale, & leadership ACOs engage providers (primary care and specialty) in delivery system change through financial (e.g. shared savings) and non-financial levers (e.g. data reports)
Integration of Systems and Processes	 ACOs establish structures and processes to promote improved administrative coordination between organizations (e.g. enrollee assignment, engagement and outreach) ACOs establish structures and processes to promote improved clinical integration across organizations (e.g. administration of care management/coordination, recommendation for services) ACOs establish structures and processes for joint management of performance and quality, and conflict resolution Accountable Care Partnership Plans (Model A) transition more of the care management responsibilities to their ACO Partners over the course of the Demonstration
Workforce Development	 ACOs recruit, train, and/or re-train administrative and provider staff by leveraging Statewide Investments (SWIs) and other supports; education includes better understanding and utilization of behavioral health (BH) and long-term services and supports (LTSS)
Health Information Technology and Exchange	 ACOs develop Health Information Technology and Exchange (HIT/HIE) infrastructure and interoperability to support provision of population health management (e.g. reporting, data analytics) and data exchange within and outside the ACO (e.g. Community Partners/Community Service Agencies (CPs/CSAs), BH, LTSS, and specialty providers)
Care Coordination and Care Management	 ACOs develop systems and structures to coordinate services across the care continuum (i.e. medical, BH, LTSS, and social services), that align (i.e. are complementary) with services provided by other state agencies (e.g., Department of Mental Health (DMH))

Population Health Management

- ACOs develop capabilities and strategies for non-CP-related population health management approaches, which include risk stratification, needs screenings and assessments, and addressing the identified needs in the population via range of programs (e.g., disease management programs for chronic conditions, specific programs for co-occurring mental health (MH)/substance use disorder (SUD) conditions)
- ACOs develop structures and processes for integration of health-related social needs (HRSN) into their Population Health Management (PHM) strategy, including management of flexible services
- ACOs develop strategies to reduce total cost of care (TCOC; e.g. utilization management, referral management, non-CP complex care management programs, administrative cost reduction)

ANALYTIC APPROACH

The ACO actions are broad enough to be accomplished in a variety of ways by different ACOs, and the scope of the IA is to assess progress, not to prescribe the best approach for an ACO. Moreover, no preestablished benchmark is available to determine what represents adequate progress at the midpoint. The need for a realistic threshold of expected progress led the IA to use a semi-empirical approach to define the state that should be considered On track. Guided by the focus areas, the IA performed a preliminary review of Full Participation Plans, which identified a broad range of activities and capabilities that fell within the logic model actions. This provided specific operational examples of how ACOs can accomplish the logic model actions for each focus area. Once an inclusive list of specific items was compiled, the IA considered the prevalence of each item, and relevance to the focus area. A descriptive definition of On track performance for each focus area was developed from the items that had been adopted by a plurality of ACOs. Items that had been accomplished by only a small number of ACOs were considered to be emerging practices and were not included in the expectations for On track performance. This calibrated the threshold for expected progress to the actual performance of the cohort as a whole.

Qualitative coding of documents to focus areas, and analysis of survey results relevant to each focus area, were used to assess whether and how each ACO had accomplished the actions for each focus area. The assessment was holistic, and as such did not require that ACOs meet every item on a list. A finding of On track was made where the available evidence demonstrated that the entity had accomplished all or nearly all of the expected items, and there are no recommendations for improvement. Where evidence was lacking in the results of desk review and survey, keyword searches of KII interview transcripts were used to seek additional information. Prior to finalizing the findings for an entity, the multiple reviewers convened to confirm that thresholds were applied consistently, and that the reasoning was clearly articulated and documented.

A rating of On track indicates that the ACO has made appropriate progress in accomplishing the indicators for the focus area. Where gaps in progress were identified, the entity was rated On track with limited recommendations or, in the case of more substantial gaps, Opportunity for improvement.

DATA COLLECTION

ACO Practice Site Administrator Survey Methodology

The aim of the ACO Practice Site Administrator Survey was to systematically measure ACO implementation and related organizational factors from the perspective of the ACOs' participating primary care practice sites. For the purpose of this report, "practice site" refers to an adult or pediatric primary care practice location.

The results of the survey were used in combination with other data sources to assess ACO cohort-wide performance in the MPA focus areas. The survey did not seek to evaluate the success of the DSRIIP

program. Rather, the survey focused on illuminating the connections between structural components and implementation progress across various ACO types and / or cohorts for the purpose of midpoint assessment.

<u>Survey Development:</u> The survey tool was structured around the MPA focus areas described previously, with questions pertaining to each of the six areas. Following a literature review of existing validated survey instruments, questions were drawn from the National Survey of ACOs, National Survey of Healthcare Organizations and Systems, and the Health System Integration Manager Survey to develop measures relevant to the State and appropriate for the target group. Cognitive testing (field testing) of the survey was conducted at 4 ACO practice sites. Following the cognitive testing and collaboration with the State, survey questions were added or modified to better align with the purpose of the MPA and the target respondents.

<u>Sampling:</u> A sampling methodology was developed to yield a sample of practice sites that is reasonably representative of the ACO universe of practice sites. First, practice sites serving fewer than 50 attributed members were excluded. Next, a random sample of 30 sites was selected within each ACO; if an ACO had fewer than 30 total sites, all sites were included. A stratified approach was applied in order to draw a proportional distribution of sites across Group Practices and Health Centers (Health Centers include both Community Health Centers and Hospital-Licensed Health Centers). A 64% survey response rate was achieved; 225 practice sites completed the survey, out of 353 sampled sites. The responses were well-balanced across practice site type (Table 2) and across geographical region (Table 3).

Table 2. Distribution of Practice Site Types

Distribution of Sites by Practice Site Type			
Group Practices Health Cente			
Percentage of Practice Site Types in Survey Sample (N=353)	80%	20%	
Percentage of Practice Site Types in Surveys Completed (N=225)	78%	22%	

Table 3. Distribution of Practices Across Geography

Regional Distribution of Practice Sites					
	Central	Greater Boston	Northern	Southern	Western
Distribution of Practice Sites in Sample (N=353)	16%	22%	25%	24%	13%
Distribution of Practice Sites Responses (N = 225)	16%	19%	25%	25%	14%

Administration: The primary contact for each ACO was asked to assist in identifying the best individual to respond to the survey for each of the sites sampled. The survey was administered using an online platform; the survey opened July 18, 2019 and closed October 2, 2019. Survey recipients were e-mailed an introduction to the survey, instructions for completing it, a link to the survey itself, and information on where to direct questions. Multiple reminders were sent to non-responders, followed by phone calls reminding them to complete the survey.

<u>Analysis</u>: Results were analyzed using descriptive statistics at both the individual ACO level (aggregating all practice site responses for a given ACO) and the statewide ACO cohort level (aggregating all responses). Given the relatively small number of sites for each ACO, raw differences among ACOs, or between an ACO and the statewide aggregate results, should be viewed with caution. The sample was not developed to support tests of statistical significance at the ACO level.

Key Informant Interviews

Key Informant Interviews (KII) of ACO Administrators were conducted in order to understand the degree to which participating entities are adopting core ACO competencies, the barriers to transformation, and the organization's experience with state support for transformation. ¹⁹ Keyword searches of the KII transcripts were used to fill gaps identified through the desk review process.

Public Consulting Group, Inc.

¹⁹ KII were developed by the IE and conducted jointly by the IE and the IA. The IA utilized the KII transcripts as a secondary data source; the IA did not perform a full qualitative analysis of the KII.

APPENDIX III: BMCHP MERCY PRACTICE SITE ADMINISTRATOR SURVEY RESULTS

The ACOs survey results, in their entirety, are provided in this appendix. The MassHealth DSRIP Midpoint Assessment Report provides statewide aggregate results.

- 7 practice sites were sampled; 7 responded (100% response rate)
- Survey questions are organized by focus area.
- The table provides the survey question, answer choices, and percent of respondents that selected each available answer. Some questions included a list of items, each of which the respondent rated. For these questions (i.e., Q# 12), the items rated appear in the answer choices column.
- NA indicates an answer choice that is not applicable to the survey question.

FOCUS AREA: ORGANIZATIONAL STRUCTURE AND ENGAGEMENT

Q#	Question	Question Components or Answer Choices	1	2	3	4	5	6	7	Don't Know
		a. Physician compensation	0%	0%	0%	29%	14%	NA	NA	57%
	In the past year, to what degree have the following practices in your	b. Performance management of physicians	0%	0%	29%	29%	14%	NA	NA	29%
	clinic become more standardized, less standardized or not changed?	c. Care processes and team structure	0%	0%	0%	71%	29%	NA	NA	0%
12	A lot less, a little less, no change, a	d. Hospital discharge planning and follow-up	0%	0%	0%	29%	71%	NA	NA	0%
	little more, a lot more standardized (1-5), I Don't Know	e. Recruiting and performance review	0%	0%	0%	29%	43%	NA	NA	29%
	(1-3), I boll t know	f. Data elements in the electronic health record	0%	0%	43%	29%	14%	NA	NA	14%
21	To the best of your knowledge, in the past, has your practice participated in payment contract(s) together with the other clinical providers and practices that are now participating in the [ACO Name]? Select one.	a. Yes, with most of the clinical providers and practices that now compose this ACO (1) b. Yes, with some of the clinical providers and practices that now compose this ACO (2) c. No, this is our first time participating in a payment contract with the clinical providers and practices that compose this ACO (3) d. Don't know	43%	0%	0%	NA	NA	NA	NA	57%
22	Has your practice received any financial distributions (DSRIP dollars) as part of its engagement with the MassHealth Accountable Care Organization?	Yes (1) No (2) Don't know	0%	0%	NA	NA	NA	NA	NA	100%
23	Is a representative from your practice site engaged in ACO governance?	Yes (1) No (2) Don't know	43%	29%	NA	NA	NA	NA	NA	29%
24	To what extent do you feel your practice has had a say in important aspects of planning and decision making within the MassHealth Accountable Care Organization that affect your practice site?	Almost never had a say (1) Rarely had a say (2) Sometimes had a say (3) Usually had a say (4) Almost always had a say (5) Don't Know/Not Applicable	0%	29%	0%	14%	29%	NA	NA	29%

25	Please indicate the extent to which you agree or disagree with the following statement: ACO leaders have communicated to this practice site a vision for the MassHealth ACO and the care it delivers.	Strongly disagree (1) Disagree (2) Neither agree nor disagree (3) Agree (4) Strongly agree (5) Don't know/ Not applicable	0%	14%	14%	71%	0%	NA	NA	0%
	To what extent do you agree or	a. The MassHealth ACO is a resource and partner in problem-solving for our practice.	0%	0%	0%	86%	0%	NA	NA	14%
26	disagree with each of the following statements? Strongly Disagree, Disagree, Neither agree nor disagree, Agree,	b. When problems arise with other clinical providers in the MassHealth ACO, we are able to work jointly to find solutions.	0%	0%	14%	71%	0%	NA	NA	14%
	Strongly agree (1-5) Don't Know/Not Applicable	c. All entities in this MassHealth ACO work together to solve problems when needed.	0%	0%	43%	43%	0%	NA	NA	14%
28	Overall, how satisfied are you with your practice's experience as part of this MassHealth ACO?	Highly dissatisfied (1) Somewhat dissatisfied (2) Neither satisfied nor dissatisfied (3) Somewhat satisfied (4) Highly satisfied (5)	0%	0%	43%	57%	0%	NA	NA	NA
34	In the past year, to what extent has your practice changed its processes and approaches to caring for MassHealth members?	a. Massive change - completely redesigned their care (1) b. A lot of change (2) c. Some change (3) d. Very little change (4) e. No change (5)	0%	43%	57%	0%	0%	NA	NA	NA
35	In the past year, to what extent has your practice's ability to deliver high quality care to MassHealth members gotten better, gotten worse, or stayed the same?	Gotten a lot harder (1) Gotten a little harder (2) No change (3) Gotten a little easier (4) Gotten a lot easier (5)	0%	0%	57%	43%	0%	NA	NA	NA
37	Which of the following approaches are used to manage the performance of individual physicians who practice at your site? Select all that apply.	a. Performance measures on quality are reported and shared with physicians (1) b. Performance measures on cost are reported and shared with physicians (2) c. One-on-one review and feedback is used (3) d. Individual financial incentives are used (4) e. Individual non-financial awards or recognition is used (5)	100%	71%	86%	86%	43%	NA	NA	NA
38	To the best of your knowledge, has your practice ever participated in any of the following, either directly or through participation in a physician group or other organization authorized to enter into such an agreement on behalf of the practice? Select all that apply.	a. Bundled or episode-based payments (1) b. Primary care improvement and support programs (e.g. Comprehensive Primary Care Initiative, Patient Centered Medical Home, Primary Care Payment Reform etc.) (2) c. Pay for performance programs in which part of payment is contingent on quality measure performance (3) d. Capitated contracts with commercial health plans (e.g. Blue Cross Blue Shield Alternative Quality Contract), etc.) (4) e. Medicare ACO upside-only risk bearing contracts (Medicare Shared Savings Program tracks one and two) (5) f. Medicare ACO, Next Generation ACO, Medicare Shared Savings Program track three) (6) g. Commercial ACO contracts (7)	50%	67%	100%	83%	33%	33%	0%	NA

FOCUS AREA: INTEGRATION OF SYSTEMS AND PROCESSES

Q#	Question	Question Components or Answer Choices	1	2	3	4	5	6	7	Don't Know
		a. An ACO/MCO	0%	43%	43%	14%	NA	NA	NA	NA
	For the care coordination and management resources used by your practice, how many of	b. The physical location and department where you work	0%	71%	14%	14%	NA	NA	NA	NA
1b	these resources are MANAGED by people at the	c. A community-based organization	14%	86%	0%	0%	NA	NA	NA	NA
	following organizations (e.g., overseen, supervised)? None, Some, Most, or All of the Resources (1-4)	d. A different practice site, department, or location in your organization	0%	86%	0%	14%	NA	NA	NA	NA
		e. Other organization, entity, or location	29%	71%	0%	0%	NA	NA	NA	NA
		a. An ACO/MCO	0%	86%	0%	14%	NA	NA	NA	NA
	For the care coordination and management resources used by your practice, how many of	b. The physical location and department where you work	0%	86%	0%	14%	NA	NA	NA	NA
1c	these resources are HOUSED at the following locations (by housed we mean the place where	c. A community-based organization	14%	86%	0%	0%	NA	NA	NA	NA
	these resources primarily provide patient services)? Wone, Some, Most, or All of the Resources (1-4)	d. A different practice site, department, or location in your organization	0%	86%	0%	14%	NA	NA	NA	NA
		e. Other organization, entity, or location	29%	71%	0%	0%				
3	For your MassHealth members who receive care coordination and management services from more than one program or person, how often do these resources operate together efficiently?	Sometimes (3) Usually (4)	0%	0%	0%	57%	14%	NA	NA	29%
		a. prescribing clinicians, including psycho-pharmacologists and psychiatrists (MDs)	57%	0%	0%	14%	0%	NA	NA	29%
	In the last 12 months, how often were your MassHealth members with behavioral health conditions referred to the following entities	b. counseling therapists, including clinical social workers	14%	0%	29%	29%	0%	NA	NA	29%
8b	when needed? Almost Never, Rarely, Sometimes, Often, Almost Always (1-5), I Don't Know	c. any type of care coordinator/manager to address behavioral health treatment, including addiction services	14%	14%	29%	0%	14%	NA	NA	29%
	,	d. any type of care coordinator/manager to address health-related social needs (housing, support, etc.)	14%	14%	29%	0%	14%	NA	NA	29%
10	How difficult is it for your practice to obtain treatment for your MassHealth members with ppioid use disorders?	Nearly impossible (1) Very difficult (2) Somewhat difficult (3) A little difficult (4) Not at all difficult (5) Don't Know/Not Applicable	0%	29%	14%	0%	0%	NA	NA	57%
15	If screening for the needs in the previous question is performed at a level other than the practice (e.g., by an accountable care organization), how often does your practice have access to the results?	Almost Never, Rarely, Sometimes, Usually, Almost Always (1-5) Not Applicable	0%	0%	14%	0%	14%	NA	NA	71%
31	Currently which of the following best describes how many MassHealth members in your practice are receiving care coordination services from a MassHealth designated Community Partner?	Very few(1) More than very few, but not many(2) About half(3) A majority(4) Nearly all(5) I don't know/I'm not aware)	0%	0%	29%	14%	0%	NA	NA	57%
32	How frequently have clinicians, staff and/or administrators interacted with Community Partner organization staff in coordinating these patients' care?	Almost Never (1) Rarely (2) Sometimes (3) Often (4) Almost Always (5) Don't know	0%	0%	67%	0%	0%	NA	NA	33%

33	To the best of your knowledge, how has the existence of Community Partners impacted your ability to provide high quality care, for your	Has made it harder almost all of the time (1) Has made it harder some of the time (2) Has made little or no change (3) Has made it easier some of the time (4) Has made it easier almost all of the time (5) Don't know	0%	0%	0%	67%	0%	NA	NA	33%	
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FOCUS AREA: WORKFORCE DEVELOPMENT

Q#	Question	Question Components or Answer Choices	1	2	3	4	5	6	7	Don't Know
27	In the past year, which of the following resources has your practice accessed as part of its involvement in this MassHealth ACO? Select all that apply.	(1) The MassHealth ACO has provided resources and/or assistance to help recruit providers and/or staff (2) The MassHealth ACO has provided resources and/or assistance to help train providers and/or staff (3) Providers and/or staff have taken part in trainings made available directly by MassHealth (4) Providers and/or staff have received training focused on behavioral health and long-term services and supports. (5) DSRIP Statewide Investments (e.g. Student Loan Repayment Program) have been provided to help in training and/or recruiting.	0%%	100%	0%	0%	0%	NA	NA	NA

FOCUS AREA: HEALTH INFORMATION TECHNOLOGY AND EXCHANGE

Q#	Question	Question Components or Answer Choices	1	2	3	4	5	6	7	Don't Know
13	Which of the following technologies are in use at your practice? Select all that apply.	(1) Electronic health record (2) Care management platform (3) Population health management platform (4) Other technology	100%	57%	14%	14%	NA	NA	NA	NA
13_EHR	To what extent do you agree that the Electronic Health Record improves your ability to coordinate care for your MassHealth members?	Strongly disagree, Disagree, Neither agree nor disagree , Agree, Strongly agree (1-5) I Don't Know	0%	0%	0%	14%	57%	NA	NA	29%
13_CMP	To what extent do you agree that the Care Management Platform improves your ability to coordinate care for your MassHealth members?	Strongly disagree, Disagree, Neither agree nor disagree , Agree, Strongly agree (1-5) I Don't Know	0%	0%	0%	0%	100%	NA	NA	0%
Q13_PHP	To what extent do you agree that the Population Health Platform improves your ability to coordinate care for your MassHealth members?	Strongly disagree, Disagree, Neither agree nor disagree , Agree, Strongly agree (1-5) I Don't Know	0%	0%	0%	0%	100%	NA	NA	0%

FOCUS AREA: CARE COORDINATION AND CARE MANAGEMENT

Q#	Question	Question Components or Answer Choices	1	2	3	4	5	6	7	Don't Know
1 a	Which of the following care coordination and management resources has your practice used in the past 12 months for your MassHealth members? Select all.	Community Health Workers (1) Patient Navigators/Referral Navigators (2) Nurse Manager/Care Coordinator (3) Any other (non-nurse) Care Coordinator/Manager (4) Social Worker (5) Other title (6)	71%	100%	100%	14%	43%	0%	NA	NA
2	In the past 12 months to what extent have these coordination and management resources helped your practice's efforts to deliver high quality care to your MassHealth members?	Not at all, A little, Somewhat, Mostly, A great deal (1-5)	0%	0%	43%	14%	43%	NA	NA	NA

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		a. Learn the result of a test your practice site ordered	0%	0%	14%	14%	43%	NA	NA	29%
		b. Know that a patient referred by your practice site	0%	0%	57%	0%	14%	NA	NA	29%
	In the past 12 months, how often was it difficult for staff in your practice site to do	was seen by the consulting clinician								
4	each of the following for your MassHealth members?	c. Learn what the consulting clinician recommends	0%	0%	29%	29%	14%	NA	NA	29%
	Always, Usually, Sometimes, Rarely, Never	for your practice site's patient d. Transmit relevant information about a								
	Difficult (1-5) Don't Know	patient who your practice site refers to a consulting clinician	0%	0%	29%	29%	14%	NA	NA	29%
		e. Reach the consulting clinician caring for a patient when your staff need to	0%	14%	14%	57%	0%	NA	NA	14%
	To what extent do you agree or disagree that	a. Arranging eye care from an ophthalmologist or optometrist	0%	0%	0%	14%	29%	14%	NA	43%
5	providers and/or staff follow a clear, established process for each of the following? There is no process in place, Strongly	b. Confirming that a diabetic eye exam was performed	0%	0%	14%	0%	71%	0%	NA	14%
	Disagree, Disagree, Neither agree nor disagree, Agree, Strongly Agree (1-6); Don't Know/Not Applicable	c. Ensuring that [Practice Name] receives the ophthalmologist or optometrist consult note	0%	0%	0%	0%	57%	0%	NA	43%
		a. Any type of care coordinator/manager	0%	0%	0%	29%	71%	NA	NA	NA
	For your complex high-need MassHealth patients, how often is any type of care coordination or management resource	b. Any type of non-clinician (e.g., community health worker)	14%	0%	0%	14%	71%	NA	NA	NA
6	involved in helping the patient adhere to the care plan? Almost Never, Rarely, Sometimes, Often,	c. Targeted interventions for patients who have been risk stratified into a high need sub-group	0%	0%	0%	29%	71%	NA	NA	NA
	Almost Always (1-5)	d. Home visits	0%	0%	14%	14%	71%	NA	NA	NA
		a. Referral to community-based services for health-related social needs	0%	0%	0%	43%	57%	NA	NA	NA
	For complex, high-need MassHealth members, how often does your practice use	b. Communication with the patient within 72 hours of discharge	0%	0%	0%	0%	100%	NA	NA	NA
7	each of the following resources to help the	c. Home visit after discharge	0%	0%	29%	43%	29%	NA	NA	NA
	patient adhere to the care plan? Almost Never, Rarely, Sometimes, Often, Almost Always (1-5)	d. Discharge summaries sent to primary care clinician within 72 hours of discharge	14%	0%	0%	43%	43%	NA	NA	NA
		e. Standardized process to reconcile multiple medications	0%	0%	14%	29%	57%	NA	NA	NA
	In the last 12 months, how often were your	a. prescribing clinicians, including psycho-pharmacologists and psychiatrists (MDs)	0%	0%	0%	14%	57%	NA	NA	29%
	MassHealth members with behavioral health conditions referred to the following entities	b. counseling therapists, including clinical social workers	0%	0%	0%	14%	57%	NA	NA	29%
8a	when needed? Almost Never, Rarely, Sometimes, Usually, Almost Always within the practice site (1-5),	c. any type of care coordinator/manager to address behavioral health treatment, including addiction services	0%	14%	0%	43%	14%	NA	NA	29%
	Don't Know/Not Applicable	d. any type of care coordinator/manager to address health-related social needs (housing, support, etc.)	0%	14%	0%	0%	57%	NA	NA	29%
		Scheduling the appropriate behavioral health services	0%	0%	0%	0%	57%	14%	NA	29%
	To what extent do you agree or disagree that providers and/or staff follow a clear,	b. Confirming that behavioral health services were received	0%	0%	14%	0%	57%	0%	NA	29%
9	established process for MassHealth members obtaining the following behavioral health services? There is no process in place, Strongly Disagree, Disagree, Neither agree nor disagree, Agree Strongly Agree (1-6): Don't	c. Ensuring that your practice site receives the prescribing clinician, counseling therapist, or any type of care coordinator/manager's consult note, as appropriate	0%	29%	0%	14%	29%	0%	NA	29%
	disagree, Agree, Strongly Agree (1-6); Don't Know/Not Applicable	d. Establishing when a prescribing clinician, counseling therapist, or any type of care coordinator/manager will share responsibility for co-managing the patient's care	0%	29%	0%	0%	29%	0%	NA	43%

		a. Screening for service needs at home that are important for the patient's health?	29%	0%	14%	0%	29%	14%	NA	14%
		b. Choosing among LTSS providers?	29%	0%	14%	0%	43%	0%	NA	14%
	To what extent do you agree or disagree that providers follow a clear, established process for the following activities?	c. Referring patients to specific LTSS providers with which your office has a relationship?	29%	0%	0%	0%	43%	14%	NA	14%
11	There is no process in place, Strongly Disagree, Disagree, Neither agree nor	d. Confirming that the recommended LTSS have been provided?	29%	0%	14%	14%	29%	0%	NA	14%
	disagree, Agree, Strongly Agree (1-6); Don't Know/Not Applicable	e. Establishing relationships with LTSS providers who serve your patients?	29%	0%	29%	0%	29%	0%	NA	14%
		f. Getting updates about a patient's condition from the LTSS providers?	29%	0%	14%	0%	43%	0%	NA	14%
17	When MassHealth members receive referrals to social service organizations, how often is your practice aware that those patients have received support from those organizations?	Almost Never, Rarely, Sometimes, Usually, Almost Always (1-5) Not Applicable	0%	0%	29%	29%	0%	NA	NA	43%
18	Does your practice regularly provide any of the following? Select all that apply.	Scheduling to enable same day appointments (1) Appointments on weekdays before 8 am or after 5 pm (2) Appointments on weekends (3) Home visits carried out by practice staff or a clinician (4) Clinical pharmacy services provided after discharge at the practice site (5) Care that is provided in part or in whole by phone or electronic media (e.g., patient portal, e-mail, telemedicine technology) (6)	100%	0%	100%	29%	29%	100%	NA	NA

FOCUS AREA: POPULATION HEALTH MANAGEMENT

Q#	Question	Question Components or Answer Choices	1	2	3	4	5	6	7	Don't Know
		a. tobacco use	100%	NA	NA	NA	NA	NA	NA	NA
		b. opioid use	43%	NA	NA	NA	NA	NA	NA	NA
		c. substance use	100%	NA	NA	NA	NA	NA	NA	NA
		d. polypharmacy	71%	NA	NA	NA	NA	NA	NA	NA
	For which of the following are	e. depression	100%	NA	NA	NA	NA	NA	NA	NA
	MassHealth members in your	f. low health literacy	57%	NA	NA	NA	NA	NA	NA	NA
	practice systematically screened? Select if screening	g. food security or SNAP eligibility	57%	NA	NA	NA	NA	NA	NA	NA
14	takes place at any level	h. housing instability	86%	NA	NA	NA	NA	NA	NA	NA
	(Managed Care Organization, Accountable Care Organization,	i. utility needs	86%	NA	NA	NA	NA	NA	NA	NA
	Practice, CP)	j. interpersonal violence	86%	NA	NA	NA	NA	NA	NA	NA
		k. transportation needs	71%	NA	NA	NA	NA	NA	NA	NA
		I. need for financial assistance with medical bills	29%	NA	NA	NA	NA	NA	NA	NA
		m. Medicaid eligibility	57%	NA	NA	NA	NA	NA	NA	NA
		n. none of the above	0%	NA	NA	NA	NA	NA	NA	NA
16	How often are MassHealth members referred from your practice to social service organizations to address health-related social needs (e.g., housing, food security)?	Almost Never, Rarely, Sometimes, Usually, Almost Always (1-5) Not Applicable	0%	0%	14%	0%	57%	NA	NA	29%

19	What is the main source of information that your practice uses to identify which of your MassHealth members are complex, high need patients? Select one.	a. We perform an ad hoc review of information from our own practice's system(s) (e.g., EHR) when we think it is relevant (1) b. We regularly apply systematic risk stratification algorithms in our practice using our patient data (2) c. We receive risk stratification information from a managed care organization or accountable care organization (3) d. We do not have a way of knowing which patients are complex/high need (4) e. Don't know	0%	71%	29%	0%	NA	NA	NA	0%
29	Please select the option below that best describes the change in the past year in your practice site's ability to tailor delivery of care to meet the needs of patients affected by health inequities (e.g., by using culturally and linguistically appropriate services):	Gotten a lot harder (1) Gotten a little harder (2) No change (3) Gotten a little easier (4) Gotten a lot easier (5)	0%	0%	14%	71%	14%	NA	NA	NA
30	How often does your practice site use site-specific data to identify health inequities within its served population? For example, data might include EHR charts or ACO reports.	Annually (1) Bi-annually (2) Quarterly (3) Monthly (4) On an ad hoc basis (5) We do not have access to this type of data. (6) We have access to this type of data but do no analyze it for health inequities. (7)	0%	0%	14%	29%	43%	14%	0%	NA

GENERAL QUESTIONS

Q#	Question	Question Components or Answer Choices	1	2	3	4	5	6	7	Don't Know
20	Our records show that your practice is participating in the [ACO name] for some or all of its MassHealth Medicaid patients. Is that correct?	Yes (1) I am not aware of this (2)	100%	0%	NA	NA	NA	NA	NA	NA
20_0	Were you able to find a colleague who can help you answer questions about [ACO Name]?	Yes (1) No (2)	NA	NA	NA	NA	NA	NA	NA	NA
20a	Currently, which of the following best describes how many of your practice's patients are covered by [ACO Name]?	Very few (1) A minority (2) About half (3) A clear majority (4) Nearly all (5)	0%	43%	14%	43%	0%	NA	NA	NA
36	Who owns your practice? (select one)	a. Independently owned (1) b. A larger physician group (2) c. A hospital (3) d. A healthcare system (may include a hospital) (4) e. Other (please specify) (5)	0%	0%	0%	100%	0%	NA	NA	NA
39	Which of the following best describes your practice site?	Adult (1) Pediatric (2) Both (3)	29%	0%	71%	NA	NA	NA	NA	NA
40	Currently which of the following best describes how many of your practice's patients are covered by any contracts with cost of care accountability?	Very few (1) A minority (2) About half (3) A majority (4) Nearly all (5)	0%	33%	67%	0%	0%	NA	NA	NA
41	To what extent do providers and staff at your practice site seem to agree that "total cost of care" contracts will become a major and sustained model of payment at your practice in the near-term (i.e., within five years)?	Strongly disagree (1) Disagree (2) Neither agree nor disagree (3) Agree (4) Strongly agree (5)	0%	0%	50%	50%	0%	NA	NA	NA

42	What is your professional discipline? (select one)	a. Primary care physician (1) b. Physician assistant/nurse practitioner (2) c. Registered nurse/nurse care manager/ LVN/LPN (3) d. Professional administrator (e.g., practice manager) (4) e. Other-please specify: (5)	0%	0%	86%	0%	14%	NA	NA	NA
43	How long have you worked at this practice site? (select one)	a. Less than 6 months (1) b. 6-12 months (2) c. 1-2 years (3) d. 3-5 years (4) e. More than 5 years (5)	0%	0%	29%	14%	57%	NA	NA	NA
44	Did you ask a colleague for help in answering questions on the survey?	Yes (1) No (2)	29%	71%	NA	NA	NA	NA	NA	NA

APPENDIX IV: ACRONYM GLOSSARY

ACPP	Accountable Care Partnership Plan
ACO	Accountable Care Partnership Plan
ADT	Accountable Care Organization
BH CP	Admission, Discharge, Transfer
СССМ	Behavioral Health Community Partner
	Care Coordination & Care Management
CCM	Complex Care Management
CHA	Community Health Advocate
CHW	Community Health Worker
CMS	Centers for Medicare and Medicaid Services
СР	Community Partner
CWA	Community Wellness Advocate
DMH	Department of Mental Health
DSRIP	Delivery System Reform Incentive Payment
ED	Emergency Department
EHR	Electronic Health Record
ENS	Event Notification Service
EOHHS	Executive Office of Health and Human Services
FPL	Federal Poverty Level
FPP	Full Participation Plan
FQHC	Federally Qualified Health Center
HIE	Health Information Exchange
HIT	Health Information Technology
HRSN	Health-Related Social Need
IA	Independent Assessor
IE	Independent Evaluator
JOC	Joint Operating Committee
KII	Key Informant Interview
LGBTQ	lesbian, gay, bisexual, transgender, queer, questioning
LCSW	Licensed Independent Clinical Social Worker
LPN	Licensed Practical Nurse
LTSS CP	Long Term Services and Supports Community Partner
MAeHC	Massachusetts eHealth Collaborative
MAT	Medication for Addiction Treatment
MCO	Managed Care Organization
MPA	Midpoint Assessment
OBAT	Office-Based Addiction Treatment
PCP	Primary Care Provider
PFAC	Patient and Family Advisory Committee
PHM	Population Health Management
QI	Quality Improvement
QMC	Quality Management Committee
=	- Guardy Managomont Committee

RN	Registered Nurse
SFTP	Secure File Transfer Protocol
SMI	Serious Mental Illness
SUD	Substance Use Disorder
SVP	Senior Vice President
SWI	Statewide Investments
TCOC	Total Cost of Care
VNA	Visiting Nurse Association

APPENDIX V: ACO COMMENT

Each ACO was provided with the opportunity to review their individual MPA report. The ACO had a two week comment period, during which it had the option of making a statement about the report. ACOs were provided with a form and instructions for submitting requests for correction (e.g., typos) and a comment of 1,000 word or less. ACOs were instructed that the comment may be attached as an appendix to the public-facing report, at the discretion of MassHealth and the IA.

Comments and requests for correction were reviewed by the IA and by MassHealth. If the ACO submitted a comment, it is provided below. If the ACO requested a minor clarification in the narrative that added useful detail or context but had no bearing on the findings, the IA made the requested change. If a request for correction or change had the potential to impact the findings, the IA reviewed the MPA data sources again and attempted to identify documentation in support of the requested change. If documentation was identified, the change was made. If documentation was not identified, no change was made to the report but the information provided by the ACO in the request for correction is shown below.

ACO Comment

None submitted.