



Commonwealth of Massachusetts
Executive Office of Health and Human Services
Office of Medicaid
www.mass.gov/masshealth

Managed Care Entity Bulletin 118

DATE: April 2024

TO: Accountable Care Organizations Participating in MassHealth

FROM: Mike Levine, Assistant Secretary for MassHealth 

RE: Accountable Care Organization—Primary Care Provider Additions and Removals
Effective January 1, 2025

Applicable Managed Care Entities and PACE Organizations

- ☒ Accountable Care Partnership Plans (ACPPs)
- ☒ Primary Care ACOs (PCACOs)
- ☐ Managed Care Organizations (MCOs)
- ☐ MassHealth's behavioral health vendor
- ☐ One Care Plans
- ☐ Senior Care Options (SCO) Plans
- ☐ Program of All-inclusive Care for the Elderly (PACE) Organizations

Overview

The Executive Office of Health and Human Services (EOHHS), through its Accountable Care Organization (ACO) program, continues to invest in primary care. EOHHS also remains focused on delivering integrated behavioral and physical health care, care management for members with complex needs, coordinated transitions of care, and an improved member experience.

This bulletin details how Accountable Care Partnership Plans (ACPPs) and Primary Care ACOs (PCACOs) (collectively referred to here as ACOs) may propose to add new primary care providers (PCPs) or to remove current PCPs, as described in Section 2.8.A.1.q.1 of the EOHHS ACPP Contract and Section 2.2.A.4.a of the EOHHS PCACO Contract. EOHHS is allowing ACOs to propose PCP additions and removals at this time to further its goals of expanding the impact of the ACO program and its benefits to more members and providers, while allowing ACOs to make limited updates to reflect changes in PCP affiliations. EOHHS will not approve any proposed PCP removals that are based on the complexity or cost of the PCP's attributed member population.

Proposals to add or remove PCPs are due by **4:00 p.m. on May 31, 2024**. The effective date of any approved additions or removals of PCPs will be January 1, 2025. ACPPs must also submit a response to [Managed Care Entity Bulletin 117](#) by the due date in that bulletin to add or

remove service areas (SAs) from their list of SAs that correspond with the ACPP's proposal to add or remove PCPs.

ACOs must use this process only for changes to an ACO's PCPs that are being proposed for an effective date of January 1, 2025. ACOs should not use this process if the proposed change qualifies for the ACO Provider File Maintenance Request process and should not use this process to change tier designations for an ACO's PCPs.

To ensure smooth transitions for members who are newly enrolled in ACOs through this process, ACOs must comply with Section 2.4.F.4 of the EOHHS ACPP Contract or Section 2.2.A.4 of the EOHHS PCACO Contract. Based on the type of ACO, these obligations include:

- the provision of a 90-day continuity of care period beginning January 1, 2025;
- extended network and provider flexibilities beyond the initial 90-day period;
- payment to out-of-network providers during the continuity of care period and continued payment to these providers after the 90-day period in certain circumstances;
- ongoing collaboration with and support to EOHHS in working with members and their providers throughout and after the continuity of care period (for example, participating on member-facing phone calls, identifying specific issues and working with EOHHS to resolve those issues, operating efficient credentialing processes); and
- focused efforts to ensure continuity of care for members who require specialized care, including, but not limited to, members who
 - are pregnant;
 - have significant health care needs or complex medical conditions;
 - have autism spectrum disorder (ASD) and are currently receiving applied behavior analysis (ABA) services;
 - are receiving ongoing services such as dialysis, home health, chemotherapy, and/or radiation therapy;
 - are hospitalized; or
 - are receiving treatment for behavioral health or substance use, including medication for addiction treatment (MAT) services.

EOHHS Review

In reviewing an ACO's request to add or remove PCPs, EOHHS may approve, disapprove, or require modification, in whole or in part, of the ACO's request. When deciding on the request, EOHHS may use its reasonable judgment as to whether the proposed additions or removals will support the goals of the ACO program, be in the best interests of members, and meet the needs of EOHHS. When deciding on the request, EOHHS may also consider factors that include, but are not limited to

- impact on members;
- impact on enrollment choices for members;

- impact on network adequacy;
- the ACO's plans for notifying impacted parties, including members and providers;
- the ACO's proposed approach to ensuring continuity of care; and
- overall ACO geographic penetration in the Commonwealth.

Additionally, in evaluating an ACO's proposal to add a PCP, EOHHS may also consider factors, such as

- the demonstrated commitment by the PCP to participate, including whether the ACO and the proposed PCP have a contract in place;
- the prior relationship and ongoing collaboration between the ACO and the PCP;
- the ACO's proposed approach to integrating the PCP into the ACO governance or organizational structure, population health management strategy, and value-based payment approach, including the Primary Care Sub-Capitation Program;
- the ACO's proposed approach to appropriate and effective data sharing and data integration between the ACO and the PCP; and
- the ACO's proposed approach to facilitating collaboration between the PCP and Community Partners.

When evaluating an ACO's proposal to remove a PCP, EOHHS may consider factors such as demonstrated effort by the ACO to resolve any challenges with the PCP.

Submission Requirements

Part 1: All Submissions

ACOs requesting to add or remove PCPs effective January 1, 2025, must submit a complete proposal to EOHHS by **4:00 p.m. on May 31, 2024**. See Submission Deadline section below.

ACOs must provide the information requested using forms provided by EOHHS. ACOs must contact their MassHealth contract manager to request a fillable version of these forms.

Submissions must come from the party holding the ACO contract with EOHHS. As appropriate, in the case of an ACPP, the ACPP may respond to each item on behalf of itself and on behalf of its ACO partner. For each item, the ACPP must clearly designate whether it is responding on its own behalf or on behalf of its ACO partner.

ACOs must work with each proposed PCP to ensure timely and accurate submission to EOHHS of the documentation required to operationalize the requested addition or removal of the PCP(s), which will be further specified by EOHHS at a later date. ACOs must work with their MassHealth contract manager to meet the deadline for submission of the required documentation.

If a PCP is “switching” ACOs (i.e., an ACO is requesting to add a PCP that is currently contracted with another ACO as a PCP), EOHHS must receive a response to this MCE bulletin from both the current ACO (seeking to remove the PCP) and from the proposed new ACO (seeking to add such PCP).

Part 2: Proposed PCP Additions

For ACPPs, a complete proposal to add a PCP includes the following:

A. Primary Care Provider (PCP) Additions Request Form

The ACPP must complete one Primary Care Provider (PCP) Additions Request Form for each PCP that the ACPP is requesting to add. For example, if the ACPP is requesting to add five new PCPs whose participation will be effective January 1, 2025, the ACPP’s submission must include five completed Primary Care Provider (PCP) Additions Request Forms.

B. Primary Care Provider (PCP) Additions—ACPP Supplemental Information Form

The ACPP must complete one Primary Care Provider (PCP) Additions—ACPP Supplemental Information Form for all PCPs that the ACPP is requesting to add. For example, if the ACPP is requesting to add five new PCPs whose participation will be effective January 1, 2025, the ACPP’s submission must include one completed Primary Care Provider (PCP) Additions—ACPP Supplemental Information Form.

C. Response to *Managed Care Entity Bulletin 117* (if applicable)

If adding a PCP corresponds with adding a service area to the ACPP’s list of SAs, the ACPP must also submit a response to *Managed Care Entity Bulletin 117* as described in the Overview section of this bulletin. The ACPP must confirm this submission in the Primary Care Provider (PCP) Additions Request Form above.

For PCACOs, a complete proposal to add a PCP includes the following:

A. Primary Care Provider (PCP) Additions Request Form

The PCACO must complete one Primary Care Provider (PCP) Additions Request Form for each PCP that the PCACO is requesting to add. For example, if the PCACO is requesting to add five new PCPs whose participation will be effective January 1, 2025, the PCACO’s submission must include five completed Primary Care Provider (PCP) Additions Request Forms.

B. Primary Care Provider (PCP) Additions—PCACO Supplemental Information Form

The PCACO must complete one Primary Care Provider (PCP) Additions—PCACO Supplemental Information Form for all PCPs that the PCACO is requesting to add. For example, if the PCACO is requesting to add five new PCPs whose participation will be

effective January 1, 2025, the PCACO's submission must include one completed Primary Care Provider (PCP) Additions—PCACO Supplemental Information Form.

Part 3: PCP Removals

For ACPPs, a complete proposal to remove a PCP includes the following:

A. Primary Care Provider (PCP) Removals Request Form

The ACPP must complete one Primary Care Provider (PCP) Removals Request Form for each PCP that the ACPP is requesting to remove. For example, if the ACPP is requesting to remove five new PCPs whose participation will be effective January 1, 2025, the ACPP's submission must include five completed Primary Care Provider (PCP) Removals Request Forms.

B. Primary Care Provider (PCP) Removals—ACPP Supplemental Information Form

The ACPP must complete one Primary Care Provider (PCP) Removals—ACPP Supplemental Information Form for all PCPs that the ACPP is requesting to remove. For example, if the ACPP is requesting to remove five new PCPs whose participation will be effective January 1, 2025, the ACPP's submission must include one completed Primary Care Provider (PCP) Removals—ACPP Supplemental Information Form.

C. Response to *Managed Care Entity Bulletin 117* (if applicable)

If removing a PCP corresponds with removing a service area (SA) from the ACPP's list of SAs, the ACPP must also submit a response to *Managed Care Entity Bulletin 117* as described in the Overview section of this bulletin. The ACPP must confirm the submission in the Primary Care Provider (PCP) Removals Request Form above.

For PCACOs, a complete proposal to remove a PCP includes the following:

A. Primary Care Provider (PCP) Removals Request Form

The PCACO must complete one Primary Care Provider (PCP) Removals Request Form for each PCP that the PCACO is requesting to remove. For example, if the PCACO is requesting to remove five new PCPs whose participation will be effective January 1, 2025, the PCACO's submission must include five completed Primary Care Provider (PCP) Removals Request Forms.

B. Primary Care Provider (PCP) Removals—PCACO Supplemental Information Form

The PCACO must complete one Primary Care Provider (PCP) Removals—PCACO Supplemental Information Form for all PCPs that the PCACO is requesting to remove.

For example, if the PCACO is requesting to remove five new PCPs whose participation will be effective January 1, 2025, the PCACO's submission must include one completed Primary Care Provider (PCP) Removals—PCACO Supplemental Information Form.

Process Questions

ACOs that want to ask questions about the process described in this MCE bulletin must send those questions to aco.program@mass.gov by **April 30, 2024**. ACOs must copy their MassHealth contract manager on any emails. EOHHS will review questions and may prepare written responses to questions that EOHHS determines to be of general interest. EOHHS also may accept questions during ACO office hours.

Submission Deadline

ACOs that want to add or remove PCPs must respond with the information specified above by **4:00 p.m. on May 31, 2024**, by email to aco.program@mass.gov, with the subject line “[ACO Name] Proposed PCP Additions/Removals Submission.”

EOHHS may contact ACOs to clarify any information submitted in response to this MCE bulletin.

MassHealth Website

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

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

Questions

If you have questions about the information in this bulletin, please

- Contact the MassHealth Customer Service Center at (800) 841-2900, TDD/TTY: 711, or
- Email your inquiry to provider@masshealthquestions.com.