



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

MassHealth
Managed Care Entity Bulletin 18
August 2019

TO: Accountable Care Partnership Plans and Managed Care Organizations
Participating in MassHealth

FROM: Daniel Tsai, Assistant Secretary for MassHealth

**RE: Managed Care Entities—Service Area and Region Additions Effective
January 1, 2020**

Overview

This bulletin explains how

1. Accountable Care Partnership Plans (ACPPs) may add new Service Areas, as defined in their Accountable Care Partnership Plan Contract with the Executive Office of Health and Human Services (EOHHS) (the ACPP Contract), to their current list of Service Areas in Appendix F of the ACPP Contract, and
2. Managed Care Organizations (MCOs) may add new Regions, as defined in their Managed Care Organization Contract with EOHHS (the MCO Contract), to their current list of Regions in Appendix F of the MCO Contract.

Proposals to add Service Area or Regions are due by **August 30, 2019, at 4 p.m.** The effective date of any approved additions to an ACPP's Service Areas or an MCO's Regions will be on or about January 1, 2020. All proposed additions approved by EOHHS shall be made effective through an amendment to the ACPP Contract and MCO Contract (together, the Contracts).

EOHHS is offering this opportunity, in part, to expand health plan choices for members who live in Martha's Vineyard and Nantucket. EOHHS intends to amend the Contracts effective January 1, 2020, to incorporate new availability requirements for primary care providers (PCPs) for Martha's Vineyard and Nantucket. Specifically, in addition to other availability requirements in Section 2.9.C of the Contracts relating to PCPs, for Martha's Vineyard and Nantucket, ACPPs' and MCOs' PCP networks shall include a sufficient number of PCPs to offer each enrollee a choice of two appropriate PCPs located within 40 miles or 40 minutes' travel time from the enrollee's residence. In addition to this change to the Contracts, EOHHS intends to update related policies accordingly. Specifically, in cases where an ACPP or MCO meets this PCP availability requirement but not solely through PCPs located on the island on which the enrollee lives, EOHHS will not auto-assign to the ACPP or MCO members who live on that island. Further, members who live on Martha's Vineyard or Nantucket will be able to change health plans at any time.

MassHealth
Managed Care Entity Bulletin 18
August 2019
Page 2 of 4

Proposal and Process Details

ACPPs and MCOs must provide information in the order in which it appears in this bulletin and limit the response to a total of five pages. Required attachments do not count toward the page limit. In some cases, ACPPs and MCOs must provide the required information in a form and format provided by EOHHS. In those cases, ACPPs and MCOs must use the templates provided by EOHHS. Submissions must come from the party holding the Contract with EOHHS (known as the Contractor in the Contracts).

ACPPs and MCOs requesting to add new Service Areas or Regions, respectively, must include the following information:

- A. An attachment listing the Service Areas or Regions that the ACPP or MCO proposes to add, using the form and format provided by EOHHS. An ACPP's or MCO's list of proposed new Service Areas or Regions must be final at the time of submission and may not be changed unless requested by EOHHS.
- B. For each Service Area or Region proposed, an estimate of the number of additional members the ACPP or MCO expects to enroll. This should include a description of how the estimate was made.
- C. The following information about the ACPP's or MCO's current and anticipated provider network:
 1. An attachment listing the names of all providers that the ACPP or MCO is currently contracted with. The list of current providers must be grouped by provider type, in a form and format provided by EOHHS. In the alternative, the ACPP or MCO may choose to submit the names of all providers with which the ACPP or MCO is contracted located within 60 minutes or 60 miles of each Service Area or Region the ACPP or MCO proposes to add, organized by Service Area or Region, in a form and format provided by EOHHS.
 2. For each proposed Service Area or Region, the ACPP or MCO must indicate whether it is relying on its current provider network to satisfy all applicable Contract requirements, including access and availability requirements set forth in Section 2.9 of the Contracts, in each proposed Service Area or Region.
 - a. If the ACPP or MCO is relying on its existing provider network, the ACPP or MCO must provide, as an attachment, its current Provider Network Geographic Access Report demonstrating compliance with the requirements in Section 2.9.C of the Contracts, in a form and format provided by EOHHS.

MassHealth
Managed Care Entity Bulletin 18
August 2019
Page 3 of 4

- b. If the ACPP or MCO is not relying on its existing provider network, and the ACPP or MCO intends to pursue additional contracts with providers to satisfy all applicable requirements in the Contracts, including access and availability requirements set forth in Section 2.9 of the Contracts, the ACPP or MCO must provide the following:
- i. an attachment listing the names of all providers with which the ACPP or MCO intends to pursue a provider contract. This information must be grouped by provider type and presented in a form and format provided by EOHHS;
 - ii. the ACPP's or MCO's strategy for pursuing such provider contracts, such that the result is the ACPP or MCO satisfies all applicable requirements in the Contracts, including access and availability requirements in Section 2.9 of the Contracts, in each proposed Service Area or Region;
 - iii. attachments of letters of intent, if any, between the ACPP or MCO and any provider with which the ACPP or MCO is pursuing a provider contract, grouped by Provider type and proposed Service Area or Region; and
 - iv. an attachment of the ACPP's or MCO's anticipated Provider Network Geographic Access Report demonstrating compliance with the requirements in Section 2.9. of the Contracts. This Report must be in a form and format provided by EOHHS, and completed as if the ACPP or MCO is successful in contracting with all of the providers the ACPP or MCO lists in response to Section C.2.b.i of this bulletin.
- D. Any challenges the ACPP or MCO anticipates in meeting applicable requirements in the Contracts, such as those in Section 2.7 or 2.9 of the Contracts, in any of the proposed Service Areas or Regions, and the steps the ACPP or MCO plans to take to mitigate such challenges.
- E. A description of how the ACPP or MCO will continue to assess its ongoing compliance with access and availability requirements in Section 2.9 of the Contracts, in all Service Areas or Regions (current and proposed).

MassHealth
Managed Care Entity Bulletin 18
August 2019
Page 4 of 4

EOHHS Review

In reviewing an ACP's request to add Service Areas, or an MCO's request to add Regions, EOHHS may approve, disapprove, or require modification, in whole or in part, of the ACP's or MCO's request based on its reasonable judgment as to whether the proposed additions will support the goals of the ACO program, be in the best interests of members, and meet the needs of EOHHS. In making such determination, EOHHS may consider factors that include but are not limited to:

- Impact on members;
- Impact on enrollment choices for members;
- Impact on network adequacy;
- The ACP's or MCO's plans for notifying impacted parties; and
- Overall ACP and MCO geographic penetration in the Commonwealth.

EOHHS may contact ACPs or MCOs to clarify any information submitted in response to this Bulletin.

Submission Deadline and Questions

ACPs that wish to add Service Areas and MCOs that wish to add Regions must respond with the information specified above by **August 30, 2019, at 4 p.m.**, via email, to the ACO Program email box (ACO.Program@state.ma.us) with the subject line: "[ACP or MCO Name] Proposed Service Area/Region Additions Submission."

ACPs and MCOs may submit written questions concerning the process to the ACO Program email box (ACO.Program@state.ma.us) by **August 16, 2019**. 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.

MassHealth Website

This bulletin is available on the [MassHealth website](#).

To [sign up](#) to receive email alerts when MassHealth issues new bulletins and transmittal letters, send a blank email to join-masshealth-provider-pubs@listserv.state.ma.us. No text in the body or subject line is needed.