



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

MassHealth
Managed Care Entity Bulletin 96
January 2023

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

FROM: Mike Levine, Acting Assistant Secretary for MassHealth

RE: Policies Regarding the Launch of the New Community Partners Program

Applicable Managed Care Entities and PACE Organizations

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

Background

In 2022, MassHealth procured and selected 20 Community Partners (CPs) entities for a Qualified Vendor List. Starting April 1, 2023, MassHealth Accountable Care Partnership Plans (ACPPs) and Primary Care Accountable Care Organizations (PCACOs) (collectively, ACPPs and PCACOs are referred to as ACOs) and Managed Care Organizations (MCOs) will subcontract with CPs from the Qualified Vendor List to provide CP supports to certain ACO and MCO enrollees. This bulletin provides requirements for ACOs and MCOs that will participate in the CP Program as of April 1, 2023, and details regarding the preparation period of January 2023 to March 2023, continuity of CP supports between April 1, 2023, and June 30, 2023, CP enrollment expectation updates, and additional information regarding the CP homelessness add-on payment and policy.

Preparation Period: January 2023 to March 31, 2023

In early February 2023, MassHealth anticipates sharing with each ACO and MCO the list of members who will be enrolled into the ACO or MCO on April 1, 2023. MassHealth will also share with ACOs and MCOs CP affiliation for members enrolled in CPs currently. Also, in late February 2023, MassHealth anticipates sharing with each ACO and MCO the list of that ACO's or MCO's CP Enrollees, along with the CP that the CP Enrollee will be enrolled with on April 1, 2023. ACOs and MCOs must contact, either directly or through their subcontracted CPs, all currently enrolled CP Enrollees to make them aware of their options as of April 1, 2023.

MassHealth
Managed Care Entity Bulletin 96
January 2023
Page 2 of 4

MassHealth expects ACOs and MCOs to work with current CPs to support CP Enrollees in preparing for any potential changes to their CP enrollment. Supports provided by ACOs, MCOs, or CPs should include review of the choices available to the CP Enrollee (i.e., which CP will be providing their services as of April 1, 2023; ability to transfer to a new CP with whom the ACO or MCO intends to hold a subcontract; or ability to disenroll from the CP Program).

Continuity of CP Supports between April 1, 2023, and June 30, 2023, for CP Enrollees

MassHealth's goal is to maintain continuity of CP supports for MassHealth members by ensuring seamless transitions, if any, during the contracting shifts from the current CP Program into the next CP Program. To achieve this goal, MassHealth will institute a 90-day continuity period for all CP Enrollees in the CP Program. MassHealth will disenroll all then-current CP Enrollees on March 31, 2023, and re-enroll them into the CP Program on April 1, 2023.

When CP Enrollees are re-enrolled into the CP Program on April 1, 2023, CP Enrollees will be re-enrolled into the same CP, or the CP that most closely aligns with their current CP, whenever feasible. In instances when this is not feasible, the CP Enrollee will be re-enrolled into a CP with which the CP Enrollee's ACO or MCO holds a subcontract. The two instances in which MassHealth will not re-enroll a CP Enrollee into their current CP are:

- CP Enrollees whose CP as of April 1, 2023, is not continuing in the new CP program; or
- CP Enrollees whose CP as of April 1, 2023, is continuing in the new CP program, but is no longer serving the member's Service Area.

During the 90-day continuity period, ACOs and MCOs must hold time-limited subcontracts with all CPs in their Service Area(s) as of April 1, 2023. Time-limited subcontracts are subcontracts that meet the requirements of Appendix P of the ACPP contract, Appendix G of the PCACO contract, and the forthcoming MCO contract amendment, but with an end date of July 31, 2023. While the 90-day continuity period ends on June 30, 2023, to ensure all CP Enrollee transitions are made smoothly, MassHealth is requiring the time-limited subcontracts to remain in place through July 31, 2023. ACOs and MCOs are not required to submit Material Subcontractor Checklists for the CPs with which it holds only time-limited subcontracts.

Prior to program launch on April 1, 2023, ACOs and MCOs shall provide an attestation to MassHealth that indicates the CPs with which it holds time-limited subcontracts within each Service Area, and ACOs and MCOs shall provide any additional information about its time-limited subcontracts as further requested by EOHHS. If ACOs and MCOs decide to continue subcontracts with a CP with which it initially held a time-limited subcontract, ACOs and MCOs will be required to follow the requirements as set out in Section 2.3.C in the ACPP Contract, Section 5.17 in the PCACO contract, and the forthcoming MCO contract amendment and submit a material subcontractor checklist for such CP(s).

During the continuity period, ACOs and MCOs may not disenroll a CP Enrollee or assign them to a different CP unless the CP Enrollee:

1. requests disenrollment from the CP Program;
2. requests transfer to another CP with which the CP Enrollee ACO and MCO has a subcontract that extends beyond July 31, 2023; or
3. graduates from the CP Program.

After June 30, 2023, ACOs and MCOs may disenroll a CP Enrollee or transfer the CP Enrollee to another CP or its internal Care Management Program in accordance with standard program requirements.

CP Enrollment Expectation Updates

MassHealth anticipates that ACO and MCO enrollment will be historically high in 2023. Given that ACO and MCO contract requirements regarding CP enrollment expectations are informed by overall ACO and MCO enrollment, MassHealth is reducing the contractual expectations regarding the percentage of members enrolled in the CP program. Notwithstanding Section 2.6.E.4 of the ACPP Contract, Section 2.4.E.4 of the PCACO Contract, and the corresponding section in the forthcoming MCO contract amendment, until further specified by EOHHS, ACOs and MCOs will only be expected to enroll approximately 2–3% of their enrollees annually in the CP program, including approximately 2% for the BH CP Program and approximately 1% for the LTSS CP Program. MassHealth will continue to re-evaluate CP enrollment expectations based on total ACO and MCO enrollment and will issue guidance and/or update contracts as appropriate.

CP Homelessness Add-On Payment

As stated in Appendix P of the ACPP Contract, Appendix G of the PCACO Contract, and the forthcoming MCO amendment, ACOs and MCOs shall make a homelessness add-on payment to CPs, and the amount shall be:

- Tier 1: 30-60% of the CP's total CP Enrollees are homeless - \$10 PMPM (for all CP Enrollees)
- Tier 2: Over 60% of the CP's total CP Enrollees are homeless - \$75 PMPM (for all CP Enrollees)

MassHealth will determine the percentage of CP Enrollees experiencing homelessness being served by each CP using an annual retrospective lookback at Z codes. MassHealth will inform ACOs and MCOs about which CPs are eligible for each tier of the homelessness add-on payment through separate guidance.

During Rate Year 2023 (April 1–December 31, 2023), MassHealth will risk-adjust the ACOs' and MCOs' non-medical or administrative rates using a simple average of the base non-medical or administrative PMPM and the prospectively risk-adjusted non-medical or administrative PMPM. Given that homelessness is factored into MassHealth's SDH3.2 risk adjustment model, MassHealth anticipates ACOs and MCOs with higher proportions of Enrollees experiencing homelessness to receive a higher risk score, and therefore a higher risk-adjusted non-medical or administrative rate. MassHealth has built its non-medical and administrative rates to account for these payments.

MassHealth Website

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

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

Questions

Dental Services

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

Long-Term Services and Supports

Phone: (844) 368-5184 (toll free)

Email: support@masshealthltss.com

Portal: MassHealthLTSS.com

Mail:

MassHealth LTSS
PO Box 159108
Boston, MA 02215

Fax: (888) 832-3006

All Other Provider Types

Phone: (800) 841-2900; TDD/TTY: 711

Email: providersupport@mahealth.net

Fax: (617) 988-8974