



COMMONWEALTH OF MASSACHUSETTS EXECUTIVE OFFICE OF HEALTH AND HUMAN SERVICES

MASSHEALTH ROBOTICS PROCESSING AUTOMATION (RPA) AGREEMENT

This Robotics Processing Automation (“RPA”) Agreement (“Agreement”) is made as of __, 20__, between the Executive Office of Health and Human Services (“MassHealth”) and _____ (“Organization”).

Legal Name of Organization (please print) Provider ID/Service Location Number

The Organization (provider, business partner, or relationship entity) enrolled with MassHealth intends to conduct transactions on MassHealth’s Medicaid Management Information System (“MMIS”) Provider Online Service Center (“POSC”) using RPA tools (AKA “bots”). The Organization agrees to the following:

- 1) The Organization is wholly responsible for the actions of its bot within the MMIS POSC.
- 2) Subject to item 6), below, the terms of the MassHealth RPA Policy (“RPA Policy”) are hereby incorporated by reference into this Agreement. The RPA Policy can be found at the [MassHealth Robotics Processing Automation \(RPA\) Policy](#) page, and the July 2022 version of the RPA Policy is attached hereto as Appendix A.
- 3) The Organization acknowledges that it has completely read, understands, and agrees to abide by the terms of the RPA Policy.
- 4) The Organization will continuously abide by the terms of the RPA Policy or immediately terminate its use of RPA tools/bots within the MMIS POSC.
- 5) If the Organization violates the RPA Policy, it will be subject to remedial actions or sanctions as determined appropriate by MassHealth, which may include but are not limited to termination of the Organization’s ability to use RPA tools/bots on the POSC or administrative fines under 130 CMR 450.239. For the avoidance of doubt, the Organization expressly agrees that the RPA Policy is among the rules, regulations, standards, and laws governing MassHealth for purposes of 130 CMR 450.238 *et seq.*
- 6) MassHealth may amend the terms of this Agreement, or the RPA Policy as incorporated by reference herein in item 2), from time to time. To implement such an amendment, MassHealth will provide reasonable notice of changes by email to the designated contact on the Organization’s approved Stage II Registration Form and by appropriate formal written issuance posted to the Mass.gov website. For purposes of this item 6), reasonable notice shall be at least 30 days before implementation of the amendment, unless MassHealth reasonably determines that less notice, or no notice, is necessary for the security of the POSC, or MassHealth reasonably determines that the amendment is required in order for MassHealth or the Organization to comply with applicable laws or regulations. The Organization shall be responsible for checking the Mass.gov website periodically and MassHealth communications for such updates. An Organization’s continued use of bots on the POSC after the implementation of an amendment shall constitute acknowledgement and acceptance of any amendment to the RPA Policy.

By signing this Agreement, the Organization, as executed by its duly authorized representative, hereby acknowledges that it has completely read, understands, and agrees to the terms of the Agreement.

Legal Name of Organization *(please print)*

Organization's Authorized Signature *(signature required - digital/electronic signature is acceptable)*

Printed Name of Signer

Date

Email Address

Phone Number



COMMONWEALTH OF MASSACHUSETTS

EXECUTIVE OFFICE OF HEALTH AND HUMAN SERVICES

MASSHEALTH ROBOTICS PROCESSING AUTOMATION (RPA) POLICY

Introduction

The Executive Office of Health and Human Services (EOHHS) requires that any/all providers, business partners, and relationship entities (henceforth, “organizations”) obtain approval from MassHealth to use Robotics Processing Automation (RPA) tools (also known as “bots”) on MassHealth’s Medicaid Management Information System (MMIS) Provider Online Service Center (POSC) prior to the implementation of any bot. EOHHS anticipates that the adoption of RPA tools will effectively reduce the administrative burden on providers.

1. RPA Registration

I. RPA Stage I Registration Request

- a. Complete and submit the MassHealth RPA Stage I Registration Form.
- b. MassHealth will evaluate the RPA Stage I Registration Form to determine approval or rejection:
 - i. If MassHealth determines that it cannot approve the submitted Stage I Registration Form, the review status of the Form will be designated as “pending re-submission” and the submitting organization will have an opportunity to resubmit the Form within seven calendar days to address any issues identified by MassHealth.
 - ii. The request for Stage I Registration may be rejected if:
 1. MassHealth determines that it cannot approve the resubmitted Form; or
 2. The submitting organization fails to resubmit the Form within seven calendar days.
- c. Upon approval of the Stage I Registration Form, MassHealth will issue a Stage I preliminary approval number.

II. RPA Stage II Registration Request

- a. Complete and submit the MassHealth RPA Stage II Registration Form.
- b. Complete and submit the MassHealth RPA Agreement and other required attachments.
- c. MassHealth will evaluate the Stage II Registration Form, MassHealth RPA Agreement, and all other required attachments to determine approval or rejection:
 - i. If MassHealth determines that it cannot approve the submitted Stage II Registration Form, the review status of the Form will be designated as “pending re-submission” and the submitting organization will have an opportunity to resubmit the Form within seven calendar days to address any issues identified by MassHealth.

1. The request for Stage II Registration may be rejected if:
 - a. MassHealth determines that it cannot approve the resubmitted Form, RPA agreement, and/or the other required attachments; or
 - b. The submitting organization fails to resubmit the Form within seven calendar days.
- d. Upon approval of the Stage II Registration Form, MassHealth RPA Agreement and all other required attachments, MassHealth will issue the Stage II approval notice.
- e. MassHealth will approve up to a maximum of five bots per Provider ID/Service Location (PID/SL).

III. RPA User ID

- a. Upon approval of the Stage II Registration Form, MassHealth will issue an official RPA User ID.
- b. Prior to the implementation of any bot, the requesting organization must generate and assign the MassHealth issued RPA User ID to the bot that will perform the approved function (e.g., submit a prior authorization request), for that specific PID/SL. Organizations must adhere to specific instructions outlined in the RPA Subordinate User ID Job-Aid to generate the RPA assigned User ID.
- c. The approved RPA User ID may not be used for any other purpose.

2. Technical Guidelines and Requirements

- I. Each organization approved to use a bot must adhere to the following requirements:
 - a. The approved bot must only perform the function it was approved to perform. Use of the bot to perform any other function on the POSC without prior written consent from MassHealth is prohibited.
 - b. Each bot must perform its tasks in a manner consistent with a human. The bot must:
 - i. Sign in and perform activities within the POSC sequentially.
 - ii. Not conduct more than three login attempts before the bot terminates activity and the end user is notified that an issue has occurred.
 - iii. Not be multi-threaded (performing multiple varied tasks).
 - iv. Not conduct concurrent sessions (simultaneous activity within the POSC).
 - v. Not submit duplicate transactions
 - c. Ensure that the time of day that the bot activities are conducted is balanced between business and non-business hours; key day-to-day business activities related to the physical delivery of services to MassHealth members should be conducted during the business day where applicable (e.g., checking eligibility prior to service delivery).
 - d. The User ID assigned to the bot and the associated password must not be shared with anyone. These credentials must not be used for any other purpose than the approved RPA tool activity outlined within the approved Stage I and Stage II RPA Registration Forms.

- e. Passwords assigned to the bot User IDs must adhere to EOHHS security password standards, which require that each password contain at least 12 characters, including one lowercase letter, one uppercase letter, one numeral, and one special character. Additionally, passwords must be changed every 60 days and at a minimum, at least two characters must be changed from all previous passwords.
 - f. MassHealth may require that the bot function as an “attended” bot (that is, supervised or aided by a human user).
 - g. All RPA product upgrades must be processed timely to ensure the most efficient and secure version of the RPA tool is interacting with the POSC.
- II. Approved organizations must test each bot within the MassHealth Trading Partner Testing environment prior to the implementation of any bot on the POSC. Furthermore, Organizations must ensure that the bot is maintained and synchronized with any or all applicable current and future MassHealth MMIS POSC modifications.

3. Maintenance

- I. Organizations that have been approved to use RPA tools on the POSC must notify MassHealth of specific changes related to the use of the bot, relevant upgrades to RPA products, and the adoption of new RPA products.
- II. Organizations must submit an RPA Modification Request Form to MassHealth if the RPA tool or the activities that the approved bot performs have been significantly modified in accordance with the following:
 - a. Any bot modification that adds an activity that is outside of the scope of the approved Stage II Registration Form (e.g., bot requires access to another screen within the POSC) must be approved by MassHealth prior to the implementation of any changes.
 - b. The RPA software product will be replaced with another RPA product.
 - c. MassHealth will review the RPA Modification Form to determine approval or rejection of the proposed bot modification:
 - 1. If MassHealth determines that it cannot approve the submitted RPA Modification Request Form, the review status of the Form will be designated as “pending re-submission”. The submitting organization will have an opportunity to resubmit the Form within seven calendar days to address any issues identified by MassHealth.
 - a. The proposed bot modification may be rejected if:
 - i. If MassHealth determines that it cannot approve the resubmitted Form; or
 - ii. The submitting organization fails to resubmit the Form within seven calendar days.
 - d. Any bot modification that solely results in activities that fall within the scope of the organization’s approved Stage II Registration Form may be carried out without notification to MassHealth (e.g., the bot will begin to interact with other data elements within a previously approved POSC screen).

- III. Organizations must notify MassHealth if one of the following RPA modifications occurs:
- a. An approved bot no longer performs the specific approved function (e.g., no longer used/retired).
 - i. The approved User ID assigned to the bot must be terminated.
 - ii. The formerly approved bot cannot be re-purposed to perform any other function on the POSC. In order to obtain approval to perform a different POSC function, a new RPA Registration Form must be submitted. See *Section 1: RPA Registration*.
 - b. The RPA tool on record has been upgraded to the extent that it impacts how the bot interacts with the POSC.
 - c. All modification notifications must be submitted to MassHealth as follows:
 - i. Submit the RPA Modification Request Form to MassHealth.
 - ii. MassHealth will review the RPA Modification Request Form to determine approval or rejection:
 1. If MassHealth determines that it cannot approve the submitted RPA Modification Request Form, the review status of the modification will be designated as “pending resubmission” and the submitting organization will have an opportunity to resubmit the Form within seven calendar days to address any issues identified by MassHealth.
 - a. The RPA Modification will be rejected if:
 - i. MassHealth determines that it cannot approve the resubmitted Form, the RPA Modification will be rejected
 - ii. The submitting organization fails to resubmit the Form within seven calendar days.
- IV. If an organization determines that a new bot is required, it must submit a new RPA Registration request.

4. Monitoring, Enforcement, and Compliance

- I. MassHealth will monitor the status of all RPA registration requests and each organization’s adherence to the MassHealth RPA Policy (“RPA Policy”).
 - a. Each approved bot request will be monitored through activation and stabilization.
 - b. All approved bots will be monitored on an on-going basis to validate that the activity performed on the POSC is consistent with the relevant RPA approval.
 - i. Organizations that use bots that perform functions inconsistent with the approved use will be subject to one or more of the following:
 1. Outreach and validation.
 2. Remediation of violation (opportunity to cure).
 3. Suspension and/or termination of the bot User ID.
 4. Prohibition from performing functions on the POSC.
 5. Organization wide ban on the ability to use RPA tools on the POSC.
 6. Other remedial actions or sanctions as determined appropriate by MassHealth. See 130 CMR 450.238: *Sanctions: General*.

- II. MassHealth will continue to monitor its MMIS to identify any bot used on the POSC that has not been approved by MassHealth.
- a. Any organization that uses a bot that has not been approved by MassHealth will be subject to one or more of the following:
 - i. Outreach and validation.
 - ii. Compliance mandate (must complete the RPA registration process set forth herein).
 - iii. If compliance is not achieved within mutually agreed upon timeframes, the organization will be subject to:
 - 1. Suspension and/or termination of the bot User ID.
 - 2. Prohibition from performing functions on the POSC.
 - 3. Organization wide ban on ability to use RPA tools on the POSC.
 - 4. Other remedial actions or sanctions as determined appropriate by MassHealth. See 130 CMR 450.238: *Sanctions: General*.
- III. Using a bot on the POSC is a convenience to organizations. Any organization that violates the RPA Policy may have their access to submit transactions via the POSC using RPA technology revoked.
- IV. Each approved organization is wholly responsible for the actions of its bot/s within the MMIS POSC and must attest to that fact by signing the RPA Agreement and submitting it with the RPA Stage II Registration Form. The terms of this RPA Policy are incorporated into the RPA Agreement. Organizations must comply with the RPA Policy, including but not limited to the following statements:
- a. The bot will not troll for data within the POSC and will access the minimum necessary data to execute its transaction in support of an impending service to a MassHealth member or the submission or validation of transactions in support of services rendered.
 - b. The bot will only perform transactions in accordance with the approved RPA Registration Form.
 - c. The information submitted by the bot is true and accurate and is based upon information required to support an impending service to a MassHealth member or in support of services rendered.
 - d. The activities of the bot must comply with MassHealth provider regulations, including the approved organization's specific provider regulations found under 130 CMR and 130 CMR 450.000: *Administrative and Billing Regulations*, including but not limited to 130 CMR 450.307:

Unacceptable Billing Practices

(A) No provider may claim payment in a way that may result in payment that exceeds the maximum allowable amount payable for such service under the applicable payment method.

(B) Without limiting the generality of 130 CMR 450.307(A), the following billing practices are forbidden:

- (1) duplicate billing, which includes the submission of multiple claims for the same service, for the same member, by the same provider or multiple providers;
- (2) overstating or misrepresenting services, including submitting separate claims for services or procedures provided as components of a more-comprehensive service for a single rate of payment is established; and
- (3) submitting claims under an individual practitioner's provider ID/service location number for services for which the practitioner is otherwise entitled to compensation.

- e. An approved bot User ID can be terminated, and an approved organization subject to sanctions or overpayment actions, if it does not comply with the regulations governing the MassHealth program, including the regulations referenced above in *Section 4.IV.d* of this RPA Policy or otherwise violates the terms of the MassHealth RPA Agreement. See 130 CMR 450.238 *Sanctions: General* and 130 CMR 450.235: *Overpayments*.
- f. Organizations are obligated to perform key administrative functions to support the delivery of healthcare to MassHealth members regardless of bot use. Should bots be used, organizations must ensure that there are appropriate business continuity plans in place, including, without limitation, plans to mitigate performance impacts of bot error or unavailability (e.g., manual data entry). The use of bots, including bot error or unavailability, does not excuse or waive the obligations of organizations to execute necessary transactions on the POSC to facilitate the delivery of healthcare to MassHealth members.

- V. Organizations will be required to validate RPA access on an annual basis. MassHealth will notify all organizations that have received an RPA Stage I or Stage II approval.