

---

## State Demonstrations Group

June 22, 2022

Amanda Cassel Kraft  
Acting Assistant Secretary  
Executive Office of Health and Human Services  
One Ashburton Place, 11<sup>th</sup> Floor, Room 1109  
Boston, MA 02018

Dear Ms. Cassel Kraft:

On December 14, 2021, Massachusetts submitted a request to revise the Delivery System Reform Incentive Payment (DSRIP) Protocol (Attachment M to the MassHealth Section 1115 Demonstration), to incorporate COVID-19 public health emergency (PHE) flexibilities for Performance Year (PY) 2021, update the Community Partner (CP) and Accountable Care Organization (ACO) measure slates, update the submission date for the ACO Community Tenure quality measure benchmark, allow flexibility to pay ACOs and CPs the portion of their earned at-risk DSRIP funds in increments as soon as various components are calculated, and allow flexibility for the State Corrective Action Plan process. To address CMS feedback, the Commonwealth submitted updated protocol revisions on February 3, 2022 and May 10, 2022.

CMS has reviewed and is approving the updated DSRIP Protocol revisions, which permit the following changes:

- Description of the COVID-19 PHE flexibilities applying to ACO and CP PY 2021 quality measure benchmarks.
- Delay the transition of the following three CP measures to pay-for-performance (P4P) until PY 2021:
  - Behavioral Health (BH) CP Follow-up After ED Visit
  - BH CP Follow-up After Acute Stay
  - Long-Term Services and Supports (LTSS) CP Follow-up After Acute Stay
- Removal of the ACO #20 quality measure from the ACO measures slate due to implementation challenges.
- Flexibility for the Commonwealth to pay ACOs and CPs the portion of their earned at-risk DSRIP funds in increments as soon as various components (e.g., quality score) are calculated, rather than waiting for both quality and total cost of care (TCOC) calculations for the DSRIP Accountability Score. This change addresses the situation where there is a delay in calculating the TCOC component of DSRIP Accountability Scores.
- Extend the ACO Community Tenure measure benchmark submission deadline from Q4 2021 to Q1 2022.

- Flexibility to the State Corrective Action Plan (CAP) process, which allows the Commonwealth to opt out of submitting a CAP and instead receive a reduction in the DSRIP expenditure authority in accordance with the State DSRIP Accountability Score.
- Updates to the CP and ACO scoring approach and measure slates to account for a subset of measures combined for composite scoring.

The updated protocol will be codified as Attachment M to the Special Terms and Conditions (STCs) of the demonstration. We look forward to our continued partnership on the MassHealth section 1115(a) demonstration. If you have any questions, please contact your CMS project officer, Ms. Rabia Khan, at (410) 786-6276 or [Rabia.Khan1@cms.hhs.gov](mailto:Rabia.Khan1@cms.hhs.gov).

Sincerely,

Angela D. Garner  
Director  
Division of System Reform Demonstrations

Enclosure

cc: Marie DiMartino, State Monitoring Lead, Medicaid and CHIP Operations Group

**Attachment M**

**Massachusetts Delivery System Reform Incentive Payment (DSRIP) Protocol**

**Contents**

- Section 1. DSRIP Overview and Goals ..... 6
  - 1.1 MassHealth Medicaid Section 1115 Demonstration..... 6
  - 1.2 Overview - Delivery System Reform Incentive Payment Program (DSRIP) ..... 6
  - 1.3 Goals of DSRIP Program..... 6
  - 1.4 DSRIP Funding Streams ..... 6
    - 1.4.1 Accountable Care Organizations..... 7
    - 1.4.2 Community Partners and CSAs ..... 7
    - 1.4.3 Statewide Investments..... 8
    - 1.4.4 State Operations and Implementation ..... 8
- Section 2. Delivery System Models..... 9
- Section 3. Participation Plans, Budgets, and Budget Narratives..... 9
  - 3.1 DSRIP Budget Periods..... 9
    - 3.1.1 ACO Budget Periods..... 9
    - 3.1.2 Community Partner and CSA Budget Periods ..... 10
    - 3.1.3 Funding Adjustments for Budget Period 5 and Close-Out Activities..... 11
  - 3.2 Participation Plans ..... 12
    - 3.2.1 Preliminary Participation Plans..... 12
    - 3.2.2 Full Participation Plans ..... 15
  - 3.3 Budgets and Budget Narratives..... 17
  - 3.4 Review and Approval Process and Timelines..... 18
    - 3.4.1 Roles and Responsibilities ..... 18
    - 3.4.2 Process for State Approval of ACO Participation Plans ..... 18
    - 3.4.3 Process for State Approval of CPs and CSAs Participation Plans..... 19
    - 3.4.4 Process for State approval of Budgets and Budget Narratives..... 20
    - 3.4.5 Process for State Approval of Modifications to Participation Plans, Budgets and Budget Narratives..... 22
- Section 4. DSRIP Payments (ACOs, CPs, CSAs and Statewide Investments)..... 23
  - 4.1 Overview and Outline ..... 23

4.2 Purpose and Allowable Uses for ACO Funding Sub-Streams.....	25
4.2.1    ACO Sub-Streams 1 & 2: Startup/Ongoing Funding (Primary Care & Discretionary).....	25
4.2.2    ACO Sub-Stream 3: Flexible Services Funding .....	26
4.2.3    ACO Sub-Stream 4: DSTI Glide Path Funding .....	26
4.3 Purpose and Allowable Uses for CP and CSA Funding Sub-Streams.....	27
4.3.1    BH CP Sub-Stream 1: Care Coordination Supports Funding .....	27
4.3.2    BH CP Sub-Stream 2: Infrastructure and Capacity Building Funding .....	27
4.3.3    BH CP Sub-Stream 3: Outcomes-Based Payments .....	28
4.3.4    LTSS CP Sub-Stream 1: Care Coordination Supports Funding .....	28
4.3.5    LTSS CP Sub-Stream 2: Infrastructure and Capacity Building Funding.....	28
4.3.6    LTSS CP Sub-Stream 3: Outcomes-Based Payments.....	28
4.3.7    CSA Sub-Stream 1: Infrastructure and Capacity Building Funding .....	29
4.4 Payment Calculation and Timing for ACO Sub-Streams .....	29
4.4.1    ACO Sub-Streams 1 & 2: Startup/Ongoing Funding (Primary Care & Discretionary).....	29
4.4.2    ACO Sub-Stream 3: Flexible Services Funding .....	31
4.4.3    ACO Sub-Stream 4: DSTI Glide Path Funding .....	32
4.4.4    Detail on calculating member-months .....	33
4.5 Payment Calculation and Timing for CP and CSA Sub-Streams .....	34
4.5.1    BH CP Sub-Stream 1: Care Coordination Supports Funding .....	34
4.5.2    BH CP Sub-Stream 2: Infrastructure and Capacity Building Funding .....	35
4.5.3    BH CP Sub-Stream 3: Outcomes-Based Payments .....	35
4.5.4    LTSS CP Sub-Stream 1: Care Coordination Supports Funding .....	35
4.5.5    LTSS CP Sub-Stream 2: Infrastructure and Capacity Building Funding.....	36
4.5.6    LTSS CP Sub-Stream 3: Outcomes-Based Payments.....	37
4.5.7    CSA Sub-Stream 1: Infrastructure and Capacity Building Funding .....	37
4.6 Statewide Investments Funding Determination Methodology.....	37
4.6.1    Student Loan Repayment Program .....	38
4.6.2    Primary Care Integration Models and Retention .....	39
4.6.3    Investment in Primary Care Residency Training.....	39
4.6.4    Workforce Development Grant Program .....	39
4.6.5    Technical Assistance for ACOs, CPs and CSAs.....	39
4.6.6    Alternative Payment Methods (APM) Preparation Fund.....	40

4.6.7	Enhanced Diversionary Behavioral Health Activities .....	40
4.6.8	Improved Accessibility for People with Disabilities or for whom English is not a Primary Language <sup>41</sup>	
4.7	DSRIP Carry Forward.....	41
Section 5.	DSRIP Accountability Framework (State Accountability to CMS; ACO, CP and CSA Accountability to State) .....	42
5.1	Overview.....	42
5.1.1	State Accountability to CMS .....	43
5.1.2	ACO, CP and CSA Accountability to the State .....	46
5.1.3	Distribution of Funds Based on Accountability.....	49
5.2	State Accountability to CMS .....	51
5.2.1	Calculating the State DSRIP Accountability Score .....	51
5.2.2	DSRIP Expenditure Authority and Claiming FFP .....	59
5.2.3	Modification to State Accountability Targets.....	59
5.3	Accountability Framework & Performance Based Payments for ACOs.....	59
5.3.1	Quality and TCOC Components of the ACO DSRIP Accountability Score .....	61
5.3.2	TCOC component of the ACO DSRIP Accountability Score.....	77
5.3.3	Impact of DSRIP Accountability Scores on Payments to ACOs.....	79
5.3.4	Process, Roles, and Responsibilities for calculating the ACO DSRIP Accountability Score	79
5.3.5	Timeline of ACO DSRIP Accountability Score data collection, calculation, and disbursement of DSRIP payments .....	81
5.3.6	ACO Exit from the DSRIP Program.....	81
5.4	Accountability Framework & Performance Based Payments for CPs and CSAs.....	82
5.4.1	Overview .....	82
5.4.2	Alignment of Quality Measure Slate with Overall Goals of the DSRIP program .....	83
5.4.3	Pay for Reporting vs. Pay for Performance .....	83
5.4.4	Calculating the CP/CSA DSRIP Accountability Score.....	83
5.4.5	Outcomes Based Payments .....	89
5.4.6	Process for calculating CP/CSA DSRIP Accountability Scores.....	89
5.4.7	Timeline of CP DSRIP Accountability Score data collection, calculation, and disbursement of DSRIP payments.....	91
5.5	Reporting Requirements for ACOs, CPs and CSAs .....	92

5.5.1	Semiannual Participation Plan Progress Reports .....	92
5.5.2	Review and Approval of Semiannual Progress Reports .....	93
5.5.3	Additional Reporting Requirements .....	93
Section 6.	State Operations, Implementation, Governance, Oversight and Reporting .....	94
6.1	Internal Operations and Implementation.....	94
6.2	Advisory Functions .....	94
6.2.1	DSRIP Advisory Committee on Quality.....	94
6.2.2	Independent Assessor.....	95
6.3	Stakeholder Engagement.....	96
6.3.1	Independent Consumer Support Program .....	96
6.3.2	State Public Outreach for ACO Program .....	96
6.3.3	State Reporting to External Stakeholders and Stakeholder Engagement.....	96
6.4	Evaluation of the Demonstration .....	96
6.4.1	Requirements for Interim Evaluation.....	96
6.4.2	Final Evaluation .....	96
6.5	CMS Oversight.....	97
6.5.1	State Reporting to CMS .....	97
6.5.2	Process for Review, Approval, and Modification of Protocol .....	97
Appendix A:	Description of ACOs and CPs.....	98
Accountable Care Organizations .....		98
Procurement Process .....		98
Community Partners .....		99
CPs will not be able to authorize services for members under either model. ....		99
Procurement Process .....		99
Relationships between ACOs and CPs .....		100
Appendix B:	Description of Statewide Investments Initiatives .....	103
Student Loan Repayment.....		103
Primary Care Integration Models and Retention .....		103
Investment in Primary Care Residency Training.....		104
Workforce Development Grant Program.....		104
Technical Assistance.....		104
Alternative Payment Methods (APM) Preparation Fund.....		106

Enhanced Diversionary Behavioral Health Activities .....	106
Improved accessibility for people with disabilities or for whom English is not a primary language ...	107
Appendix C: Example Calculation of State DSRIP Accountability Score by Accountability Domain for BP 4.....	109
Step 1: Calculate the MassHealth ACO/APM Adoption Rate Score for BP 4 .....	109
Step 2: Calculate the Reduction in Spending Growth Score for BP 4 .....	109
Step 3: Calculate the Overall Statewide Quality Performance for BP 4.....	110
Step 4: Calculate the Overall State DSRIP Accountability Score for BP 4.....	113
Step 5: Determine At-Risk Funds Lost and Earned for BP 4 .....	113
Appendix D: Measure Tables .....	115

## Section 1. DSRIP Overview and Goals

### 1.1 MassHealth Medicaid Section 1115 Demonstration

The DSRIP Protocol provides additional detail to the State's DSRIP proposal, beyond those set forth in the Section 1115 Demonstration and Special Terms and Conditions (STCs). The DSRIP Protocol applies during the demonstration Approval Period (July 1, 2017 - June 30, 2022).

### 1.2 Overview - Delivery System Reform Incentive Payment Program (DSRIP)

In accordance with STC 60(e) and as set forth in this document, the State may allocate DSRIP funds to four purposes: (1) Accountable Care Organization (ACO) funding, which supports the implementation of three ACO models, including transitional funding for certain safety net hospitals; (2) Community Partners (CP) funding, which supports the formation and payment of Behavioral Health (BH) and Long Term Services and Supports (LTSS) CPs and funding for Community Service Agencies (CSAs); (3) Statewide Investments, which are initiatives related to statewide infrastructure and workforce capacity to support successful reform implementation; and (4) State Operations and Implementation, which includes the State's oversight of the DSRIP program.

### 1.3 Goals of DSRIP Program

Massachusetts' DSRIP program provides an opportunity for the State to emphasize value in care delivery, better meet members' needs through more integrated and coordinated care, and moderate the cost trend while maintaining the clinical quality of care. The State's DSRIP goals are to (1) implement payment and delivery system reforms that promote member-driven, integrated, coordinated care and hold providers accountable for the quality and total cost of care; (2) improve integration among physical health, behavioral health, long-term services and supports and health-related social services; and (3) sustainably support safety net providers to ensure continued access to care for Medicaid and low-income, uninsured individuals.

### 1.4 DSRIP Funding Streams

To accomplish the goals of the DSRIP program, Massachusetts plans to launch and support with DSRIP funding the following initiatives:

- **Accountable Care Organizations** – Generally provider-led health systems or organizations with an explicit focus on integration of physical health, behavioral health, long term services and supports and health-related social service needs. ACOs will be financially accountable for the cost and quality of their members' care.
- **Community Partners / Community Service Agencies (CSAs)** – Community-based BH and LTSS organizations who support eligible members with BH and LTSS needs.
- **Statewide Investments** – Set of direct state investments in scalable infrastructure and workforce capacity.

Additionally, the State will utilize DSRIP funding to support Statewide Operations and Implementation, including oversight, of the DSRIP program.

Exhibit 1 shows anticipated amounts of funding per DSRIP funding stream by demonstration year as well as the overall anticipated percentage of funding distributed to each stream in total. Please see Section 4.7 for discussion of situations in which funding may be shifted between funding streams or carried forward from one demonstration year to the next.



EXHIBIT 1 – DSRIP Anticipated Funding Streams By Demonstration Year (\$M)

Funding Stream	Demo Y1	DY2	DY3	DY4	DY5	Total	% of Total*
ACOs	\$329.2M	\$289.9M	\$229.4M	\$152.0M	\$65.1M	<b>\$1,065.6M</b>	<b>59%</b>
Community Partners (including CSAs)	\$57.0M	\$95.9M	\$132.2M	\$133.6M	\$128.0M	<b>\$546.6M</b>	<b>30%</b>
Statewide Investments	\$24.2M	\$24.6M	\$23.8M	\$24.8M	\$17.4M	<b>\$114.8M</b>	<b>6%</b>
State Operations and Implementation	\$14.6M	\$14.6M	\$14.6M	\$14.6M	\$14.6M	<b>\$73.0M</b>	<b>4%</b>
<b>Total:</b>	<b>\$425.0M</b>	<b>\$425.0M</b>	<b>\$400.0M</b>	<b>\$325.0M</b>	<b>\$225.0M</b>	<b>\$1,800.0M</b>	

\*Percentages do not sum to 100% due to rounding

### 1.4.1 Accountable Care Organizations

To achieve Massachusetts’ DSRIP goals as described above, the State intends to launch a new Accountable Care Organization program. Massachusetts has designed three ACO payment models that respond to the diversity of the State’s delivery system, and intends to select ACOs across all three models through a competitive procurement. Massachusetts intends to contract with ACOs across all three ACO models starting in 2017.

Massachusetts’ three ACO models are:

- **Accountable Care Partnership Plan (a Partnership Plan):** either a MCO with a separate, designated ACO partner, or a single, integrated entity that meets the requirements of both. Partnership Plans are vertically integrated between the health plan and ACO delivery system, and take accountability for the cost and quality of care under prospective capitation
- **Primary Care Accountable Care Organization:** a provider-led health care system or other provider-based organization, contracting directly with MassHealth, with savings and risk shared retrospectively
- **MCO-Administered ACO:** a provider-led health care system or other provider-based organization that contracts with MCOs and takes financial accountability for shared savings and risk as part of MCO networks

### 1.4.2 Community Partners and CSAs

Community Partners will provide support to eligible members with complex BH and LTSS needs, including linkages to community resources, allowing providers to deliver comprehensive care for the whole person and improvement in member health outcomes. Community Partners (CPs) will receive DSRIP funds for care coordination activities, as well as to support infrastructure and workforce capacity building. CPs will be required to partner with the ACOs and MCOs. ACOs and MCOs will similarly be required to partner with both BH and LTSS CPs. The goals of Community Partners include:

- Creating explicit opportunities for ACOs and MCOs to leverage existing community-based expertise and capabilities to best support members with LTSS and BH needs
- Breaking down existing silos in the care delivery system across BH, LTSS and physical health
- Ensuring care is person-centered, and avoiding over-medicalization of care for members with LTSS needs

- Preserving conflict-free principles including consideration of care options for members and limitations on self-referrals
- Making investments in community-based infrastructure within an overall framework of performance accountability
- Requiring ACOs, MCOs and Community Partners to formalize how they work together, e.g., for care coordination and performance management

Massachusetts will selectively procure two types of Community Partners:

- **Behavioral Health Community Partners (BH CPs):** BH CPs will support eligible adult members with a diagnosis of Serious Mental Illness (SMI) and/or Substance Use Disorders (SUD) as well as adult members who exhibit SMI and SUD needs, but have not been diagnosed, as defined by the State.
- **LTSS Community Partners (LTSS CPs):** LTSS CPs will support eligible members ages three and older with complex LTSS needs, which may include members with physical disabilities, members with acquired or traumatic brain injury, members with intellectual or developmental disabilities (ID/DD) and others, as defined by the State.

**Community Service Agencies (CSAs):** Additionally, existing provider entities, known as Community Service Agencies (CSAs) currently provide State Plan intensive care coordination services to eligible MassHealth members under 21 years of age with Serious Emotional Disturbances (SED). These CSAs will be eligible to receive DSRIP funds for infrastructure and workforce capacity building. CSAs will not receive DSRIP funds as payment for the provision of Massachusetts State Plan services.

### 1.4.3 Statewide Investments

Statewide Investments are part of the State’s strategy to efficiently scale up statewide infrastructure and workforce capacity, and will play a key role in moving Massachusetts towards achievement of its care delivery and payment reform goals. Massachusetts will utilize DSRIP funds to invest in the following eight high priority initiatives:

1. Student loan repayment program
2. Primary care integration models and retention program
3. Expanded support of residency slots at community health centers
4. Workforce professional development grant program
5. Technical assistance to ACOs and CPs (scalable, state-procured approach)
6. Alternative payment methods preparation fund
7. Enhanced diversionary behavioral health services
8. Improved accessibility for people with disabilities or for whom English is not a primary language

These eight initiatives are further detailed in Section 4.6.

### 1.4.4 State Operations and Implementation

The State will allocate a portion of DSRIP funding to support robust operations, implementation and oversight of the DSRIP program (see Section 6 for detail). An integrated team of state administrative staff will implement and oversee general and day-to-day administration of ACOs, CPs and Statewide Investments programs to ensure success and movement towards state goals. This team will manage several

contracted vendors that support key aspects of program implementation. In addition, several independent entities will support the State’s oversight of the DSRIP program, including the DSRIP Steering Committee, DSRIP Advisory Committee on Quality, Independent Assessor and Independent Evaluator (see Sections 3.4.1.2 and 6.4 for further details on each). The State Operations and Implementation funding stream will support these personnel/fringe and contractual costs.

## **Section 2. Delivery System Models**

Please see Appendix A for discussion of Delivery System Models, including a description of the procurement process for ACOs and CPs, as well as a high-level description of selection criteria for these entities.

## **Section 3. Participation Plans, Budgets, and Budget Narratives**

In order to receive DSRIP funding, each ACO, CP and CSA will be required to submit for the State’s approval: (1) a Participation Plan for the five-year demonstration period; and (2) a Budget and Budget Narrative for each annual budget period. These documents will detail how ACOs, CPs and CSAs will use DSRIP funding. The Participation Plan will cover the five years of the demonstration period. There will be two Participation Plans submitted – (1) “Preliminary Participation Plan” – providing an initial five-year plan and (2) “Full Participation Plan” – submitted to provide a revised five-year plan based on refined estimates of projected funding amounts. The State will use its review and approval processes of these documents to align with ACOs, CPs and CSAs on initiatives, goals and investments and to hold ACOs, CPs and CSAs accountable to the State’s delivery system reform goals. The State will also use these documents to report to CMS, as requested.

Because the DSRIP Participation Plans are based around the ACOs’, CPs’ and CSAs’ budget periods, this section begins by explaining the DSRIP budget periods that will apply to these entities. The section then discusses the details of the Preliminary Participations Plans, Full Participation Plans, Budgets and Budget Narratives that ACOs, CPs and CSAs will submit to the State, including what information will be included in each. The Section then details the State’s review and approval process for each of these documents.

### **3.1 DSRIP Budget Periods**

#### **3.1.1 ACO Budget Periods**

The State’s 1115 demonstration aligns with the State’s fiscal year (July 1 to June 30). Performance years (PYs) for the State’s ACO Program (i.e., the time periods which the State will use to calculate cost and quality accountability for ACOs) align with the calendar year (January 1 to December 31), and are thus offset from the State’s demonstration years by 6 months.

The State will disburse DSRIP funding to ACOs using six “Budget Periods” (BPs) that align with ACO performance years. The State anticipates that the first BP, the “Preparation Budget Period,” will begin on July 1, 2017 or when contracts between the State and the ACOs are executed (whichever is later) and end December 31, 2017. ACOs will therefore have completed their contracting with the State prior to the start of the Preparation Budget Period. During this Preparation Budget Period, ACOs will have the opportunity to make investments and arrangements necessary to succeed as an ACO. Moving to a Total Cost of Care (TCOC) model is a significant undertaking that requires preparation and investment such as training staff, purchasing appropriate infrastructure, and setting up electronic, secure communications. The Preparation Budget Period will allow for such actions to occur. Investments may include, but are not limited to: health information technology, performance management infrastructure, network development/contracting, project management, and care coordination/management investment.

During this Preparation Budget Period, the State will work with ACOs to ensure they are ready for the responsibilities of the full TCOC model (e.g., enrolling members, taking financial risk, receiving data supports) including holding regular meetings with ACOs, performing a structured “readiness review” process similar to the one the State undertakes for its MCOs, and providing preliminary data supports. Additionally, ACOs will be required to submit Budgets and Budget Narratives that lay out their plans and goals for DSRIP funding. The State will review and approve such plans, requesting additional information where necessary.

Budget Periods 1-5 (BP 1-5) will each last for one full calendar year, with Budget Period 1 beginning January 1, 2018 and ending December 31, 2018, etc. Please see Exhibit 2 for the schedule of the DSRIP ACO Budget Periods.

**EXHIBIT 2 – Schedule of DSRIP ACO Budget Periods**

CY2017		CY2018				CY2019				CY2020				CY2021				CY2022			
Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
State Demonstration Y1		Demo Y2				Demo Y3				Demo Y4				Demo Y5							
		ACO Performance Y1				ACO PY 2				ACO PY 3				ACO PY 4				ACO PY 5			
Prep Budget Period		Budget Period 1				BP 2				BP 3				BP 4				BP 5			

The budget period approach will not change the amount of funding that an ACO receives for a given demonstration year. Specifically, the Preparation Budget Period funds will be sourced from demonstration year 1 funds. Budget Period 1 funds will be sourced from demonstration year 1 and year 2 funds. Budget Periods 2 through 4 will be sourced by the same funding pattern as Budget Period 1. Budget Period 5 funds will be sourced only from demonstration year 5 funds.

**3.1.2 Community Partner and CSA Budget Periods**

The State’s 1115 demonstration years align with the State’s fiscal year (July 1 to June 30). Performance years for the State’s CP program (i.e., the time periods the State will use to calculate accountability for CPs) align with the calendar year (January 1 to December 31), with the exception of Performance Year 1, which is six months from July 1, 2018 to December 31, 2018. CP performance years are thus generally offset from the State’s demonstration years by six months.

The State will disburse DSRIP funding to CPs and CSAs using six “Budget Periods” (BPs) that align with CP and CSA Performance Years. The first BP, the “Preparation Budget Period” will begin when contracts between the State and the CPs and CSAs are executed (anticipated October/November 2017) and end May 31, 2018. During the Preparation Budget Period, CPs will utilize infrastructure dollars to invest in technology, workforce development, business startup costs and/or operational infrastructure. During the Preparation Budget Period, CSAs will utilize infrastructure dollars to invest in technology, workforce development and/or operational infrastructure.

CP and CSA Budget Period 1 will be seven months from June 1, 2018 to December 31, 2018. The remaining four budget periods (BP 2-5) will each last for one full calendar year, with Budget Period 2 beginning January 1, 2019 and ending December 31, 2019, etc. If the State changes the schedule for CP and CSA performance years, the State may adjust the CP and CSA Budget Periods to align with the performance years. Please see Exhibit 3 for the anticipated schedule of the DSRIP CP and CSA Budget Periods.

EXHIBIT 3 – Schedule of DSRIP CP/CSAs Budget Periods

CY2017		CY2018				CY2019				CY2020				CY2021				CY2022			
Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
State Demonstration Y1		Demo Y2				Demo Y3				Demo Y4				Demo Y5							
		CP Performance Y1 (6 mo.)		CP PY 2				CP PY 3				CP PY 4				CP PY 5					
Prep Budget Period		Budget Period 1 (7 mo.)				BP 2				BP 3				BP 4				BP 5			

This budget period approach will not change the amount of funding that a CP or CSA receives for a given demonstration year. Specifically, the Preparation Budget Period funds will be sourced from demonstration year 1 funds. Budget Period 1 funds will be sourced from demonstration year 1 and year 2 funds. Budget Periods 2 through 4 will be sourced by the same funding pattern as Budget Period 1. Budget Period 5 funds will be sourced only from demonstration year 5 funds.

### 3.1.3 Funding Adjustments for Budget Period 5 and Close-Out Activities

The second half of Budget Period 5 (July 1, 2022 to December 31, 2022), as well as the time period during which DSRIP close-out activities will occur, falls outside of the approved demonstration period (July 1, 2017 to June 30, 2022). To account for this, the following programmatic and administrative close-out payments will be attributed to the relevant Budget Periods:

#### Programmatic Payments

- ACO Startup/Ongoing payments (see Section 4.4.1)
- ACO DSTI Glide Path payments (see Section 4.4.3)
- ACO Flexible Services payments (see Section 4.2.2)
- CP and CSA Infrastructure and Capacity Building payments (see Sections 4.5.2, 4.5.5, and 4.5.7)
- CP Care Coordination payments (see Sections 4.5.1 and 4.5.4)
- CP Outcomes-Based Payments (see Sections 4.5.3 and 4.5.6)
- ACO, CP, and CSA Earned At-Risk payments (see Section 5.1.2)
- ACO, CP, and CSA Performance Remediation Plan payments (see Sections 5.3.4.2 and 5.4.6.1)

The ACO Startup/Ongoing, DSTI Glide Path, and CP/CSA Infrastructure and Capacity Building payments attributed to the first half of BP5 will be twice the amount as what they would have been if payments had been attributed throughout the whole BP. For example, if an ACO had \$100 total of non-at-risk startup/ongoing funds for BP5, payments attributed to BP5 would be split between the first two quarters of BP5 (\$50 each), as opposed to \$25 attributed across each of the four quarters of BP5 (see Section 4.4.1 for more specific funding details). Similarly, if a CP had \$100 total of non-at-risk infrastructure and capacity building funding for BP5, the total amount would be attributed to the first half of BP5 (see Section 4.5.2 for more specific funding details).

For ACO flexible services funding, during the first half of BP5, the State will pay out the full BP5 flexible services funding prospectively, based on the ACO's approved BP5 flexible services budgets. ACOs will still need to submit their flexible services documentation and claims during BP5. If the ACOs do not use all of their flexible services allocation in BP5, or if the ACOs make expenditures that are deemed unacceptable by the State, then the ACOs will have to return the appropriate amount of flexible services funding to the State. See Section 4.2.2 for more specific funding details.

The State pays CPs for care coordination supports provided on a monthly basis, based on qualifying activities submitted by the CPs. The CPs have a limited time period from the delivery of care coordination supports to submit a qualifying activity for payment, as determined by the State. All payments associated with qualifying activities submitted during this allowable time period will be attributed to the budget period during which the supports were provided. For example, payments associated with care coordination supports provided in June 2022 will be attributed to BP5, as long as the qualifying activities are submitted during the allowable time period.

BH CP outcomes-based payments (see Section 4.5.3) and LTSS CP outcomes-based payments (see Section 4.5.6), which are tied to performance in specific budget period, starting with Budget Period 3, will be attributed to that budget period.

ACO, CP, and CSA earned at-risk payments (see Section 5.1.2) and performance remediation plan payments (see Sections 5.3.4.2 and 5.4.6.1), which are tied to performance in a specific budget period, will be attributed to that budget period.

### **Administrative Close-Out Activities**

- Work of Independent Assessor (see Section 6.2.2)
- Work of Independent Evaluator (see Section 6.4.2)
- Work of Member Experience Survey vendor (see Section 5.5.3)
- Work of Statewide Investments vendor (see Section 4.6)

The Independent Assessor, Independent Evaluator, member experience survey vendor, and the Statewide Investments vendors all will perform DSRIP close-out activities occurring after the demonstration period. Associated payments will be attributed to either the relevant budget period or to the first half of Budget Period 5, as determined by the State. For example, if the member experience survey vendor is fielding a survey to assess BP4 member experience, then the associated payments for those activities will be attributed to BP4. As another example, payments to the Statewide Investments vendor administering close-out activities for the student loan repayment program will be attributed to the first half of BP5.

## **3.2 Participation Plans**

### **3.2.1 Preliminary Participation Plans**

Preliminary Participation Plans document ACOs', CPs' and CSAs' plans for DSRIP expenditure. For the Preparation Budget Period and the first quarterly payment of Budget Period 1, the State will not disburse DSRIP funds to an ACO, CP or CSA that does not have a state-approved Preliminary Participation Plan. The State may withhold DSRIP funds from an ACO, CP or CSA if there are outstanding State requests for amendments to its Preliminary Participation Plan.

#### **3.2.1.1 ACOs**

Each ACO will submit for the State's approval a Preliminary Participation Plan with its response to the ACO procurement. Once approved, the State may request amendments to the Preliminary Participation Plan as necessary. At a minimum, this Preliminary Participation Plan will include information such as:

- The ACO's five-year business plan, including the ACO's goals and identified challenges under the ACO contract with MassHealth



- The ACO’s planned investments and spending plan, including specific investments or programs the ACO anticipates supporting with DSRIP funds. Such investments and programs may include but are not limited to:
  - Care coordination or care management programs, including any programs to manage high-risk populations or other population health initiatives and including the ACO’s transitional care management program
  - Efforts to address members’ health-related social needs, including expanding community linkages between the ACO and providers, Community Partners or other social service organizations, and including any spending on allowable flexible services to address health-related social needs
  - Ensuring appropriate workforce capacity and professional development opportunities to meet increased expectations for care coordination, management and integration
  - Investments in the ACO’s and providers’ data and analytics capabilities
  - Programs to shift service volume or capital away from avoidable inpatient care toward outpatient, community-based primary and preventive care, or from institutional care towards community-based LTSS, including capital investments to downsize or repurpose inpatient or institutional capacity<sup>1</sup>, investments in expanding outpatient and community capacity and costs associated with piloting new care delivery models, such as those involving alternate settings of care and the use of telehealth or home-based services
  - Investments in improved linguistic and cultural competency of care, including hiring translators and providers fluent in members’ preferred languages
  - Other investments or programs identified and proposed by the ACO that align with other requirements that MassHealth will have of the ACO

### *3.2.1.2 Community Partners/CSAs*

Each CP and CSA will submit for the State’s approval a Preliminary Participation Plan with their procurement responses and requests for funding respectively. Once approved, the State may request amendments to Preliminary Participation Plans as necessary. The Preliminary Participation Plan may include:

- Executive Summary: This section will summarize the CP’s or CSA’s DSRIP Participation Plan and describe the CP’s or CSA’s five-year business plan, goals and identified challenges.
- Partnerships: This section will list providers with which the CP or CSA will partner and describe these relationships and how they will align with the CP’s or CSA’s proposed investments and programs, as well as the CP’s or CSA’s core goals, such as improving the quality of member care.
- Member and Community Population: This section will include a description of the CP’s or CSA’s member population and surrounding communities, regions and service areas covered and how the CP or CSA will both promote the health and well-being of these individuals, and also actively initiate and maintain engagement with them.
- Narrative: The narrative will describe
  - The CP’s Care Model (CPs only):
    - Proposed staffing models

---

<sup>1</sup> Payments will be made to support providers’ reform efforts that focus on the goals of reducing hospitalization and promotion of preventative care in the community, not directly to offset revenue from reduced hospital utilization.

- Proposed outreach and engagement strategies
- Proposed process for assessment and person-centered care planning
- Proposed process for managing transitions of care
- Proposed methods for how the CP will address members' health and wellness issues
- Proposed methods for how CP will connect the member to community resources and social services
- Proposed methods and processes for how the CP will enable continuous quality and member experience improvement
- The CP's or CSA's investment plan:
  - Identifying specific investments or programs that the CP or CSA will support with DSRIP funds
  - Estimating the amount and structure (e.g., one-time vs. annual) of costs associated with each investment or program
  - Explaining how each investment or program will support the CP's or CSA's core goals, such as improving the quality of member care and ensuring integration of care across different settings of care
  - Specifying goals, internal evaluation, measurement or performance management strategies the CP or CSA will apply to these investments or programs to demonstrate effectiveness and inform subsequent revisions to the Participation Plan
  - Examples of domains for potential CP or CSA investments or programs include but are not limited to:
    - Workforce capacity development
    - Data and analytics
    - HIT
    - Performance management capabilities
    - Contracting/networking development
    - Project management capabilities
    - Care coordination and community linkages
- Implementation of care model requirements
  - Spending Categories and Amounts: This section will include the CP's or CSA's anticipated spend over the five years in broad based funding categories.
  - Timeline: This section will include a five-year timeline for the CP's or CSA's proposed investments and programs.
  - Sustainability: This section will describe the CP's or CSA's plan to sustainably fund proposed investments and programs after the five-year period. This section may include information about other funding opportunities available to the CP or CSA, as well as information about any tools,



resources or processes that the CP or CSA intends to develop using DSRIP funding and continue using after the end of the DSRIP investment.

- Metrics and Measures: This section will describe the CP's or CSA's plan to report on the various DSRIP accountability metrics set forth in Appendix D.

### **3.2.2 Full Participation Plans**

Full Participation Plans build on the information contained in Preliminary Participation Plans. For all DSRIP payments except the Preparation Budget Period and the first quarter's payments for Budget Period 1, the State will not disburse DSRIP funds to an ACO, CP or CSA that does not have a state-approved Full Participation Plan. The State may withhold DSRIP funds from an ACO, CP or CSA if there are outstanding State requests for amendments to its Full Participation Plans.

#### **3.2.2.1 ACOs**

Once each ACO is notified of (1) its anticipated amount of Budget Period 1 funds, and (2) its tentative amount of Budget Period 2 through 5 funds, the ACO will submit a Full Participation Plan (see section 3.4.2 for timeline). The Full Participation Plan will expand on the information submitted with the Preliminary Participation Plan, and will include information such as:

- The ACO's five-year business plan, including the ACO's goals and identified challenges under the ACO contract with MassHealth
- The providers and organizations with which the ACO is partnering or plans to partner, the governance structure and a description of how these partnerships will support the ACO's planned activities and proposed investments
- A population and community needs assessment
- The ACO's planned investments and spending plan, including specific investments or programs the ACO anticipates supporting with DSRIP funds. Such investments and programs may include but are not limited to:
  - Care coordination or care management programs, including any programs to manage high-risk populations or other population health initiatives and including the ACO's transitional care management program
  - Efforts to address members' health-related social needs, including expanding community linkages between the ACO and providers, Community Partners or other social service organizations, and including any spending on allowable flexible services to address health-related social needs
  - Ensuring appropriate workforce capacity and professional development opportunities to meet increased expectations for care coordination, management and integration
  - Investments in the ACO's and providers' data and analytics capabilities
  - Programs to shift service volume or capital away from avoidable inpatient care toward outpatient, community-based primary and preventive care or from institutional care towards community-based LTSS, including capital investments to downsize or repurpose inpatient or institutional capacity, investments in expanding outpatient and community capacity and costs associated with piloting new care delivery models, such as those involving alternate settings of care and the use of telehealth or home-based services
  - Investments in improved linguistic and cultural competency of care, including hiring

translators and providers fluent in members' preferred languages

- Other investments or programs identified and proposed by the ACO that align with other requirements that MassHealth will have of the ACO
- Estimates of the amount and structure (e.g., one-time vs. annual) of costs associated with each investment or program identified in the ACO's Participation Plan
- Descriptions of how each investment or program will support the ACO's performance
- Specific goals, evaluation plans, measurable outcomes and performance management strategies the ACO will apply to each investment or program
- A five-year timeline of the ACO's proposed investments and programs
- A description of the ACO's plan to sustainably fund proposed investments and programs over the five-year period as DSRIP funding levels decrease
- Descriptions of how the ACO will fulfill its contract requirements, including:
  - Investments, value-based payment arrangements and performance management for its primary care providers
  - Care delivery improvement and care management strategies
  - Relationships with other providers, state agencies and other entities involved in the care of its members
  - Relationships with CPs
  - Activities to ensure the ACO's compliance with contract management, reporting and administrative requirements described in the ACO contract
- A plan to increase the ACO's capabilities to share information among providers involved in care of its members. Such plan will include, at a minimum:
  - The ACO's current event notification capabilities and procedures to ensure that the ACO's primary care providers are aware of members' inpatient admissions and emergency department visits
  - The ACO's self-assessed gaps in such capabilities and procedures, and how the ACO plans to address such gaps
  - A description of the ACO's plans, if any, to increase the use of EHR technologies certified by the Office of the National Coordinator (ONC)
  - A description of how the ACO plans to ensure the ACO's providers consistently use the statewide health information exchange to send or receive legally and clinically appropriate patient clinical information and support transitions of care
- Attestations to ensure non-duplication of funding

### **3.2.2.2 Community Partners**

Once the CP or CSA is notified of (1) the amount of Budget Period 1 funds, and (2) the tentative amount of Budget Period 2 through 5 funds, the CP or CSA will be required to submit a Full Participation Plan. The Full Participation Plan will expand on the information submitted within the Preliminary Participation Plan and will reflect the new information available to CPs or CSAs about their anticipated funding amounts (see section 3.4.3 for timeline). Examples of additional detail that CPs and CSAs will be contractually required to provide include:

- The community-based organizations and providers with which the CP or CSA is partnering or plans to partner, the CSA or CP consortium governance structure and a description of how these partnerships will support the CP's or CSA's planned activities and proposed investments
- Descriptions of specific investments or programs the CP or CSA will support with DSRIP funds, including cost estimates, measures, goals and performance management and sustainability plans in the following areas:
  - Relationships with state agencies, community-based organizations, providers and other entities involved in the care of its members
  - Relationships with ACOs and MCOs
  - Activities to ensure the CP's or CSA's compliance with contract management, reporting and administrative requirements described in the CP's or CSA's contract with MassHealth and agreements with ACOs and MCOs
  - Workforce development and stability
- A plan to increase the CP's or CSA's capabilities to share information with ACOs and MCOs and among providers involved in care of its members. Such plan will include, at a minimum:
  - The CP's or CSA's current communication practices and capabilities
  - The CP's or CSA's self-assessed gaps in such capabilities and procedures, and how the CP or CSA plans to address such gaps
  - A description of the CP's or CSA's plans, if any, to increase the use of Electronic Health Record and Care Management technology
  - A description of how the CP or CSA plans to ensure the CP or CSA and its partners consistently use the statewide health information exchange to send or receive legally and clinically appropriate patient clinical information and support transitions of care
- Details about how the CP or CSA will not duplicate existing infrastructure with their planned DSRIP investments

### **3.3 Budgets and Budget Narratives**

Each ACO, CP and CSA will submit a Budget and Budget Narrative to MassHealth for approval for each budget period. ACOs will submit a Budget and Budget Narrative to the State prior to each budget period. CPs and CSAs may submit a Budget and Budget Narrative to the State after the start of a budget period. The Budget is an itemized budget for the ACO's, CP's or CSA's proposed DSRIP-funded investments and programs for the Budget Period; the accompanying Budget Narrative explains uses of the funds. The State will provide a budget template for ACOs, CPs and CSAs to utilize. The State will not disburse DSRIP funds for a given budget period to an ACO, CP or CSA that does not have a state-approved Budget and Budget

Narrative for that Budget Period, except that the State may make care coordination supports payments to CPs during the first three months of BP2 before the BP2 budgets have been approved.. The State may withhold DSRIP funds from an ACO, CP or CSA if there are outstanding State requests for amendments to its Budgets or Budget Narratives.

## **3.4 Review and Approval Process and Timelines**

### **3.4.1 Roles and Responsibilities**

#### ***3.4.1.1 State***

The State will review, approve and/or request revisions to ACOs', CPs' and CSAs' Preliminary and Full Participation Plans, Budgets and Budget Narratives. If necessary, the State will work collaboratively with ACOs, CPs and CSAs on revisions to Participation Plans, Budgets and Budget Narratives.

#### ***3.4.1.2 Independent Assessor***

The Independent Assessor will review ACOs', CPs' and CSAs' Full Participation Plans, Budgets (from BP 1 onwards) and Budget Narratives (from BP 1 onwards), as well as any formal requests for modification to these documents submitted by ACOs, CPs and CSAs. The Independent Assessor will make recommendations to the State for each such document or request; these recommendations may be recommendations to approve, deny or propose certain changes to these documents or requests. The State will work closely with the Independent Assessor, and consider its recommendations during the review process. The State retains final decision-making authority regarding approvals, denials or requests for changes to Participation Plans, Budgets and Budget Narratives, as well as to any modification requests. If the Independent Assessor makes a recommendation to the State that differs from the State's final decision, the State will document its decision in the State's quarterly reports to CMS. The Independent Assessor will not determine whether a request to amend a Participation Plan, Budget, Budget Narrative, or Performance Remediation Plan is a material deviation, as this is the responsibility solely of the State.

#### ***3.4.1.3 CMS***

CMS may request to review Participation Plans (Preliminary and Full), Budgets and Budget Narratives. The State will provide requested documents within 45 calendar days of receiving the request. All final approved Participation Plans, Budgets, and Budget Narratives will be sent to CMS. The State will provide the following information to be posted on Medicaid.gov: (1) an executive summary of each ACO's and CP's participation plan; (2) list of each ACO and CP as well as the populations they serve and their website; (3) an executive summary of each ACO's and CP's progress reports; and (4) each ACO's and CP's DSRIP yearly funding amount.

### **3.4.2 Process for State Approval of ACO Participation Plans**

#### ***3.4.2.1 Preliminary Participation Plan Approval for ACOs***

The State's process for submission, review and approval of Preliminary Participation Plans for ACOs will be as follows:

- ACOs submit Preliminary Participation Plans with their procurement response
- The State reviews Preliminary Participation Plans with ACOs' procurement submissions
- At the end of this review process, the State will approve or deny the Preliminary Participation Plans or request additional information and resubmissions of the Preliminary Plans before approval.
- The State anticipates completing approval of ACOs' Preliminary Participation Plans in July/August 2017.

### ***3.4.2.2 Full Participation Plans for ACOs***

The process for submission, review and approval of Full Participation Plans for ACOs will be as follows:

- The State notifies ACOs of anticipated BP1 funding amounts and tentative BP2 through BP5 funding amounts and requests a Full Participation Plan
- ACOs submit Full Participation Plans to the State (the State will provide ACOs up to 30 calendar days from the date of notification). The State intends to work with ACOs who request additional time or fail to respond in a timely fashion to ensure prompt submission
- The State and Independent Assessor review Full Participation Plans in parallel. The State intends to complete its review of the Full Participation Plans, including evaluating the Independent Assessor's recommendations, within 45 calendar days of ACOs' submission. Requests for additional information and resubmissions may require additional time.
- At the end of this review process, the State approves, denies or requests additional information regarding the ACOs' Full Participation Plans.
- **The State therefore anticipates completing approvals of Full Participation Plans within 75 calendar days of requesting them from ACOs as follows:**
  - The State anticipates approving Full Participation Plans in April 2018

### **3.4.3 Process for State Approval of CPs and CSAs Participation Plans**

#### ***3.4.3.1 Preliminary Participation Plan approval for CPs and CSAs***

The State's process for submission, review and approval of Preliminary Participation Plans for CPs and CSAs will be as follows:

- CPs submit Preliminary Participation Plans with their request for funding
- CSAs submit Preliminary Participation Plans with their request for funding
- The State reviews CP and CSA Preliminary Participation Plans within 75 calendar days of their submission
- At the end of this review process, the State will approve, deny or request additional information regarding the Preliminary Participation Plan. The State intends to work with CPs and CSAs who request additional time or fail to respond in a timely fashion to ensure prompt submission.
- **The State therefore anticipates completing reviews and approvals of Preliminary Participation Plans within 75 calendar days of submission as follows:**
  - The State anticipates approval of Preliminary Participation Plans in August 2017

#### ***3.4.3.2 Full Participation Plans for CPs and CSAs***

The process for submission, review and approval of Full Participation Plans will be as follows:

- The State notifies CPs and CSAs of actual BP1 funding and tentative BP2 through BP5 funding amounts and requests a Full Participation Plan
- CPs and CSAs submit Full Participation Plans to the State within 30 calendar days from the date of notification).
  - The State intends to work with CPs and CSAs who request additional time or fail to respond in a timely fashion to ensure prompt submission

- The State and Independent Assessor review Full Participation Plans in parallel. The State intends to complete its review of the Full Participation Plans, including evaluating the Independent Assessor's recommendations, within 45 calendar days of CPs' and CSAs' submission. Requests for additional information and resubmissions may require additional time.
- At the end of this review process, the State approves, denies or requests additional information regarding the Full Participation Plans.
- **The State therefore anticipates completing approvals of Full Participation Plans within 75 calendar days of requesting them from CPs and CSAs as follows:**
  - For CPs and CSAs, the State anticipates approving Full Participation Plans in May 2018

### 3.4.4 Process for State approval of Budgets and Budget Narratives

#### 3.4.4.1 Process for State approval of ACO Budgets and Budget Narratives

The process for submission, review and approval of Budgets and Budget Narratives for Budget Period 1-5 for ACOs will be as follows:

- The State notifies ACOs of the upcoming budget period's anticipated funding amounts, and requests each ACO submit a Budget and a Budget Narrative for the upcoming budget period (See Section 4.4).
- ACOs submit to the State their Budgets and Budget Narratives for the upcoming BP within 30 calendar days of receiving the State's request. The State intends to work with ACOs who request additional time or fail to respond in a timely fashion to ensure prompt submission
- The State and Independent Assessor review Budgets and Budget Narratives in parallel. The State intends to complete its review of the Budgets and Budget Narratives, including evaluating the Independent Assessor's recommendations, within 45 calendar days of their submission. Requests for additional information and resubmissions may require additional time.
- At the end of this review process, the State approves, denies or requests additional information regarding the Budgets and Budget Narratives.
  - After approval, the State will disburse the first quarterly DSRIP payment for the new Budget Period.
- If the data required to calculate funding amounts for a given budget period are not available by August of the preceding Budget Period, then the State may provide ACOs with a preliminary funding amount to construct their Budgets and Budget Narratives. The State would disburse the first quarterly payment based on the preliminary funding amount, and then calculate final funding amounts as well as a reconciliation amount to be added to or subtracted from the ACO's subsequent quarterly DSRIP payments in that Budget Period, such that payments for the budget period total the final funding amount for that budget period.
  - If the funding amount for a given ACO changes by more than 20% from the preliminary funding amount on which the ACO based its Budget and Budget Narrative, the State will ask the ACO to revise and resubmit its Budget and Budget Narrative. The State may also request revisions in its discretion.
- **The State therefore anticipates completing approvals of Budgets and Budget Narratives within 75 calendar days of requesting them from ACOs as follows:**
  - For Preparation Budget
    - The State anticipates notifying ACOs of anticipated Preparation Budget funding amounts in June 2017

- The State anticipates ACOs submitting Preparation Budgets and Budget Narratives in July 2017
- The State anticipates approving Budgets and Budget Narratives in August 2017
- For BP 1-5:
  - The State anticipates providing ACOs with anticipated funding amounts in October of the preceding budget period
  - The State anticipates ACOs will submit to the State their Budgets and Budget Narratives and their updated safety net revenue calculation in November of the preceding budget period
  - The State anticipates approving ACOs' Budgets and Budget Narratives in January of the new budget period
  - If the preliminary member count for BP 1 is estimated prior to the Operational Start Date of the program and therefore prior to actual member enrollments being effective, the State may postpone this timeline by several months for BP 1, and delay the first quarterly payment of BP 1 at its discretion. This process may allow the State to adjust for changes in enrollment levels if, for example, member movement exceeds expectations

#### ***3.4.4.2 Process for State Approval of CP and CSA Budget and Budget Narratives***

CPs will receive bi-annual infrastructure development funding as well as be reimbursed monthly for care management and care coordination activities based on the number of members assigned and engaged. CSAs will receive DSRIP funding for Infrastructure development only.

The process for submission, review and approval of CP and CSA Budgets and Budget Narratives for Budget Period 1-5 will be as follows:

- The State notifies CPs and CSAs of preliminary upcoming budget period's funding amounts and requests the Budgets and Budget Narratives for the upcoming budget period
  - Infrastructure development payments will be based on a member snapshot
  - For CPs, the BP1 member snapshot will be an estimate of member engagement
  - For CSAs, the member snapshots will be based on actual caseload
- Within 30 calendar days, CPs and CSAs submit to the State their Budgets and Budget Narratives for the upcoming BP
  - The State intends to work with CPS and CSAs who request additional time or fail to respond in a timely fashion to ensure prompt submission
- The State and Independent Assessor review Budgets and Budget Narratives in parallel. The State intends to complete its review of the Budgets and Budget Narratives, including evaluating the Independent Assessor's recommendations, within 45 calendar days of their submission. Requests for additional information and resubmissions may require additional time.
- At the end of this review process, the State approves, denies or requests additional information regarding the Budgets and Budget Narratives.
- After approval, the State will disburse funding bi-annually for infrastructure funding and monthly for care coordination funding
- **The State therefore anticipates completing approvals of Budgets and Budget Narratives within 75 calendar days of requesting them from CPs and CSAs as follows:**
  - For Preparation Budget



- The State anticipates notifying CPs and CSAs of Preparation Budget funding in August 2017
- The State anticipates CPs and CSAs submitting Preparation Budgets and Budget Narratives in September 2017
- The State anticipates approving Budgets and Budget Narratives in October 2017
- For BP 1:
  - The State anticipates providing CPs and CSAs with a preliminary version of their anticipated payments in February 2018
  - The State anticipates that CPs and CSAs will submit their BP1 Budgets and Budget Narratives to the State in March 2018
  - The State anticipates approving CP and CSA Budgets and Budget Narratives in May 2018
- For BP 2-5:
  - The State anticipates providing CPs and CSAs with a preliminary version of their anticipated payments in December of the preceding budget period
  - The State anticipates that CPs and CSAs will submit their current year budget period Budgets and Budget Narratives to the State in January of the budget period
  - The State anticipates approving CP and CSA Budgets and Budget Narratives in March of the budget period
  - The State anticipates making bi-annual infrastructure payments in April and October of the budget period and monthly care coordination payments

### **3.4.5 Process for State Approval of Modifications to Participation Plans, Budgets and Budget Narratives**

ACOs, CPs and CSAs may submit ad hoc requests to amend their Participation Plans, Budgets, and Budget Narratives at any time except within 75 days of the end of the Budget Period. ACOs, CPs or CSAs will not be allowed to materially deviate from their approved spending plans without formally requesting such modification and having the modification approved by the State. The State has sole discretion to determine whether an amendment request is a material deviation, and thus a modification. In addition, the State may require ACOs, CPs or CSAs to modify their Full Participation Plans, Budgets or Budget Narratives in certain circumstances (e.g., if a primary care practice where an ACO had previously proposed making investments goes out of business).

The State's process for submission, review and approval of modification requests will be as follows:

- ACOs, CPs or CSAs submit a modification request
- The State and Independent Assessor review the modification request in parallel. The State intends to complete its review of modification requests, including evaluating the Independent Assessor's recommendations, within 45 calendar days of their submission. Further requests for additional information and resubmissions may require additional time.
- At the end of this review process, the State approves, denies or requests additional information
- The State therefore anticipates completing approvals of modification requests within 45 calendar days of requesting them from ACOs, CPs and CSAs

If the State denies the modification request, the State and Independent Assessor will provide feedback about why the request was denied, and the State may allow the entity to resubmit their modification request after



revisions, as appropriate. The timeline for review would restart upon resubmission, and the same processes would be followed as for an initial submission.

The State may withhold or deduct a portion of ACO, CP, or CSA DSRIP funds for contract management purposes (e.g. in response to significant delays in responding to DSRIP deliverable submission deadlines). If funds are deducted, such funds may be reallocated by the State according to the parameters described in Section 5.1.3 of this Protocol.

## Section 4. DSRIP Payments (ACOs, CPs, CSAs and Statewide Investments)

DSRIP funding will support four streams, as described in Section 1. This Section (Section 4) outlines parameters for DSRIP payments to ACOs, CPs, CSAs and Statewide Investments including sub-streams. A portion of payments from the State to ACOs, CPs and CSAs are at risk based on the ACO, CP and CSA Accountability Framework described in Section 5. Section 5 also describes the linkage between ACO, CP and CSA accountability to the State. Section 4 explores DSRIP payments to ACOs, CPs or CSAs and the sub-streams within them.

Each of ACO and CP payment streams has several “sub-streams,” which differ from each other with respect to three characteristics: (1) purpose/allowable uses; (2) calculation methodology; (3) and accountability. These three characteristics are detailed for each sub-stream in the following three subsections 4.1-4.3, respectively. Section 4.5 provides additional detail on how Accountability Scores are calculated using the accountability framework laid out in Section 4.4.

- Section 4.1: provides an overview of the sub-streams of DSRIP funding for ACOs, CPs and CSAs, as well as their amounts and the process for the State to vary those amounts
- Section 4.2: provides detail on purpose and allowable uses for ACO sub-streams
- Section 4.3: provides detail on purpose and allowable uses for CP and CSA sub-streams
- Section 4.4: provides detail on payment calculation and timing for ACO sub-streams
- Section 4.5: provides detail on payment calculation and timing for CP and CSA sub-streams
- Section 4.6: provides funding information on Statewide Investments
- Section 4.7: provides detail on DSRIP carry forward capacity

### 4.1 Overview and Outline

The State has divided the ACO, CPs and CSA DSRIP funding streams into eleven sub-streams: four for ACOs, three each for BH CPs and LTSS CPs and one for CSAs.

EXHIBIT 4 – ACO, CP and CSA Sub-Streams

ACO Funding Stream 4 sub-streams	CP and CSA Funding Stream 7 sub-streams		
	BH CPs: <i>3 sub-streams</i>	LTSS CPs: <i>3 sub-streams</i>	CSAs: <i>1 sub-stream</i>
<ul style="list-style-type: none"> <li>• Startup/Ongoing: primary care investment</li> <li>• Startup/Ongoing: discretionary</li> <li>• Flexible services</li> <li>• DSTI Glide Path</li> </ul>	<ul style="list-style-type: none"> <li>• Care coordination</li> <li>• Infrastructure and Capacity Building</li> <li>• Outcomes-based</li> </ul>	<ul style="list-style-type: none"> <li>• Infrastructure and Capacity Building</li> </ul>	

Per STC 60(e), the State may reallocate funding amounts between the “ACO Funding Stream” and the “CP and CSA Funding Stream” at its discretion. If the actual funding amounts for the ACO Funding Stream or the CP and CSA Funding stream differ from the amounts set forth in Table G of STC 60(e) by more than 15%, the State must notify CMS 60 calendar days prior to the effective reallocation of funds. CMS reserves the right to disapprove any such reallocations prior to the effective date of the reallocation.

Within the “ACO Funding Stream” or “CP Funding Stream”, the State may distribute payments for a given demonstration year among the sub-streams to best meet the State’s programmatic needs, in its discretion without notifying CMS, subject to the parameters described in STC 60(e). Because the mechanisms for holding ACOs and CPs financially accountable differ among these sub-streams, changes in the distribution of funding among the sub-streams may change the amount of funding for an individual ACO or CP that is at risk. For example, if funding is shifted from the “Startup/Ongoing: Discretionary” ACO sub-stream to the “Startup/Ongoing: Primary Care Investment” ACO sub-stream, this would lead to less at-risk funding because funds have shifted from a sub-stream with an at-risk component to a sub-stream without an at-risk component (see Exhibit 19). Exhibit 5 below shows the State’s distribution of DSRIP payments to ACOs, CPs and CSAs by funding stream for each budget period, as well as the State’s anticipated sample distribution of DSRIP payments within the ACO and CP funding streams by sub-stream. The table also shows the percent and total funding for each stream and sub-stream that is at-risk based on the ACOs’, CPs’ and CSAs’ accountability to the State (see Section 5 for more information on accountability). This Exhibit is provided for illustrative purposes only and is an estimate of anticipated funding among funding streams and sub-streams at this point in time.

EXHIBIT 5 – Provider Accountability to State

		Prep BP	BP1	BP2	BP3	BP4	BP5	Total
<b>ACOs (Accountability to State)</b>	<b>Total Funds</b>	\$138.2M	\$284.1M	\$238.0M	\$192.5M	\$132.7M	\$64.0M	\$1,049.5M
	<b>At-Risk %</b>	0%	4%	10%	19%	27%	20%	11%
	<b>At-Risk Funds</b>	\$0.0M	\$10.0M	\$24.1M	\$36.8M	\$36.4M	\$12.9M	\$120.3M
<i>Startup/Ongoing: Primary Care Investment (Not At-Risk)</i>	<b>Total Funds</b>	\$21.8M	\$43.6M	\$29.6M	\$30.5M	\$10.5M	\$10.8M	\$146.7M
<i>Startup/Ongoing: Discretionary</i>	<b>Total Funds</b>	\$94.9M	\$165.1M	\$153.3M	\$117.2M	\$86.5M	\$23.7M	\$640.7M
	<b>At-Risk %</b>	0%	5%	15%	30%	40%	50%	18%
	<b>At-Risk Funds</b>	\$0.0M	\$8.3M	\$23.0M	\$35.2M	\$34.6M	\$11.9M	\$112.9M
<i>Flexible Services (Not At-Risk)</i>	<b>Total Funds</b>	\$0.0M	\$40.8M	\$32.1M	\$27.9M	\$23.6M	\$24.3M	\$148.7M
<i>DSTI Glide Path Funding</i>	<b>Total Funds</b>	\$21.5M	\$34.6M	\$23.0M	\$16.8M	\$12.2M	\$5.2M	\$113.4M
	<b>At-Risk %</b>	0%	5%	5%	10%	15%	20%	7%
	<b>At-Risk Funds</b>	\$0.0M	\$1.7M	\$1.1M	\$1.7M	\$1.8M	\$1.0M	\$7.4M
<b>Community Partners (Accountability to State)</b>	<b>Total Funds</b>	\$15.8M	\$59.0M	\$105.6M	\$125.5M	\$122.0M	\$118.9M	\$546.7M
	<b>At-Risk %</b>	0%	0%	3%	11%	16%	20%	11%
	<b>At-Risk Funds</b>	\$0.0M	\$0.0M	\$3.6M	\$14.3M	\$19.9M	\$23.6M	\$61.4M
<b>Behavioral Health CPs</b>	<b>Total Funds</b>	\$11.7M	\$46.3M	\$80.2M	\$91.1M	\$86.5M	\$83.1M	\$398.9M
	<b>At-Risk %</b>	0%	0%	3%	11%	16%	20%	11%
	<b>At-Risk Funds</b>	\$0.0M	\$0.0M	\$2.5M	\$9.9M	\$13.7M	\$16.2M	\$42.3M
<i>Care Coordination Supports</i>	<b>Total Funds</b>	\$0.0M	\$21.9M	\$60.3M	\$66.4M	\$66.2M	\$65.9M	\$280.6M
<i>Infrastructure and Capacity Building (including CSAs)</i>	<b>Total Funds</b>	\$11.7M	\$24.4M	\$19.9M	\$23.6M	\$19.3M	\$16.2M	\$115.3M
	<b>At-Risk %</b>	0%	0%	13%	42%	71%	100%	37%
	<b>At-Risk Funds</b>	\$0.0M	\$0.0M	\$2.5M	\$9.9M	\$13.7M	\$16.2M	\$42.3M
<i>Outcomes-Based Stream (Incentive Pool, Not At-Risk)</i>	<b>Total Funds</b>	\$0.0M	\$0.0M	\$0.0M	\$1.0M	\$1.0M	\$1.0M	\$3.0M
<b>LTSS CPs</b>	<b>Total Funds</b>	\$4.0M	\$12.7M	\$25.3M	\$34.4M	\$35.5M	\$35.8M	\$147.8M
	<b>At-Risk %</b>	0%	0%	4%	13%	18%	21%	13%
	<b>At-Risk Funds</b>	\$0.0M	\$0.0M	\$1.0M	\$4.5M	\$6.2M	\$7.4M	\$19.1M
<i>Care Coordination Supports</i>	<b>Total Funds</b>	\$0.0M	\$5.7M	\$17.1M	\$23.3M	\$26.3M	\$27.9M	\$100.3M
<i>Infrastructure and Capacity Building</i>	<b>Total Funds</b>	\$4.0M	\$6.9M	\$8.2M	\$10.7M	\$8.8M	\$7.4M	\$46.0M
	<b>At-Risk %</b>	0%	0%	13%	42%	71%	100%	41%
	<b>At-Risk Funds</b>	\$0.0M	\$0.0M	\$1.0M	\$4.5M	\$6.2M	\$7.4M	\$19.1M
<i>Outcomes-Based Stream (Incentive Pool, Not At-Risk)</i>	<b>Total Funds</b>	\$0.0M	\$0.0M	\$0.0M	\$0.5M	\$0.5M	\$0.5M	\$1.5M

## 4.2 Purpose and Allowable Uses for ACO Funding Sub-Streams

### 4.2.1 ACO Sub-Streams 1 & 2: Startup/Ongoing Funding (Primary Care & Discretionary)

ACO sub-streams 1 and 2 are for Startup/Ongoing funds. Startup/Ongoing funds are split into two sub-streams. Sub-stream 1 is explicitly dedicated for primary care investment. ACOs will be required to spend these funds on state-approved investments that support the ACO’s primary care providers such as capital investments in primary care practices (e.g., inter-operable EHR systems), trainings for primary care providers and support staff in population health management protocols, administrative staff to support front-line providers with clinical quality initiatives, etc. Having a dedicated funding stream for primary care investment is an important mechanism for the State to ensure that ACOs and their PCPs are mutually

committed to each other, having mutual discussions about business decisions and working together to meet the State's delivery system reform goals. In order to ensure that primary care investments supported by DSRIP do not duplicate other federal or state investments, ACOs will be required to disclose in their Full Participation Plans what state and federal investments the ACO is using to support primary care investments, and how the ACO is ensuring non-duplication with proposed DSRIP funding uses.

Sub-stream 2 is for discretionary Startup/Ongoing funding and may be used by the ACO for other state-approved investments. Some examples of investment opportunities for ACOs include, but are not limited to: health information technology, contracting/network development, project management, and care coordination/management investment, assessments for members with identified LTSS needs, workforce capacity development and new or expanded telemedicine capability.

The funding amounts for these two sub-streams decrease over the five demonstration years and are intended to support ACO investments as they start their ACO models and provide operating funds to support (during initial years) the ongoing costs of these models. As ACOs progress through the five demonstration years, the State expects ACOs to increasingly self-fund these investments and expenses out of their TCOC-based revenue (e.g., medical gains under capitation rates, or shared savings payments).

#### **4.2.2 ACO Sub-Stream 3: Flexible Services Funding**

A portion of ACO DSRIP funds will be dedicated to spending on flexible services. Flexible services funding will be used to address health-related social needs by providing supports that are not currently reimbursed by MassHealth or other publicly-funded programs. These flexible services must satisfy the criteria described in STC 63(b)(ii), 63(c), and 63(d). ACOs will receive a Flexible Services allocation each Budget Period, as determined by the State. Please see the Flexible Services Protocol for more details on how ACOs will be able to access their Flexible Services funding allocation for BP1 through BP4. During the first half of BP5, the State will pay out the full BP5 flexible services funding amount prospectively, based on the ACO's approved BP5 flexible services budgets. ACOs will still need to submit their flex services documentation and claims during BP5. If the ACOs do not use all of their flexible services allocation in BP5, or if the ACOs make expenditures that are deemed unacceptable by the State, then the ACOs will have to return the appropriate amount of flexible services funding to the State. Additional details about flexible services will be delineated in the Flexible Services Protocol (Attachment R), which is to be reviewed and approved by CMS by July 2017.

If CMS does not approve the Flexible Services Protocol by August 2017, then the State may reallocate the Budget Period 1 flexible services funding allocation detailed in Exhibit 5 to other Budget Period 1 DSRIP funding streams so that the State's expenditure authority is not reduced due to non-approval of the Flexible Services Protocol, or it may carry forward the expenditure authority into subsequent Budget Periods without counting against the 15% benchmark described in STC 60(d)(ii). Similarly, the State may continue to reallocate the flexible services funding allocation for each Budget Period to other DSRIP funding streams for that Budget Period if CMS does not approve the Flexible Services Protocol by the July of the preceding Budget Period. Any such reallocation will be included in an updated funding allocation table in the next quarterly progress report to CMS. CMS will have 90 calendar days to request modifications to the reallocation proposal.

#### **4.2.3 ACO Sub-Stream 4: DSTI Glide Path Funding**

During the five-year demonstration, the State will restructure demonstration funding for safety net hospital systems to be more sustainable and aligned with value-based care delivery and payment incentives. The seven safety net hospitals currently receiving funding through the Delivery System Transformation Initiatives (DSTI) program will instead receive a reduced amount of ongoing operational support through Safety Net Provider payments authorized under the State's restructured Safety Net Care Pool. To create a sustainable transition from current funding levels to these new, reduced levels, the State will provide transitional DSRIP funding to these DSTI safety net hospitals.

Payment of the DSTI Glide Path funding is contingent on a safety net hospital's approved participation with a MassHealth ACO (and therefore on their financial accountability for cost and quality). To receive this funding, a safety net hospital must have a provider arrangement or contract with an ACO that demonstrates its participation in that ACO's efforts, including at a minimum documented participation in the ACO's transitional care management and other contractual responsibilities (e.g., data integration), and financial accountability including the potential for the safety net hospital to share gains from savings and share responsibility for losses.

This DSTI Glide Path funding will be paid directly to any ACO that has a provider arrangement or contract with one of these seven DSTI safety net hospitals. The ACO will be required to give the full amount of this funding to the participating safety net hospitals. The amount of DSTI Glide Path funding will decrease each year, sustainably transitioning safety net hospitals to lower levels of supplemental support.

### **4.3 Purpose and Allowable Uses for CP and CSA Funding Sub-Streams**

MCOs and ACOs will delegate comprehensive care management responsibility to the BH CP for members diagnosed with Serious Mental Illness (SMI) and/or Substance Use Disorder (SUD), as well as adult members who exhibit SMI and SUD, but have not been diagnosed, and who are assigned to the BH CPs. BH CPs are required to coordinate care for members enrolled with the BH CP across the full healthcare continuum, including physical and behavioral health, LTSS and social service needs. This section describes the purpose and allowable uses for the three funding sub-streams for each CP (care coordination, infrastructure and capacity building and outcome-based payments) and one sub-stream for CSAs (infrastructure and capacity building):

#### **4.3.1 BH CP Sub-Stream 1: Care Coordination Supports Funding**

BH CPs will receive funds under BH CP sub-stream 1 to perform the following functions for assigned members:

1. Outreaching to and actively engaging members
2. Identifying and facilitating a care team for every engaged member
3. Person-centered treatment planning for every engaged member
4. Coordinating services across the care continuum to ensure that the member is in the right place for the right services at the right time
5. Supporting transitions between care settings
6. Providing health and wellness coaching
7. Facilitating access and referrals to social services and other community services

#### **4.3.2 BH CP Sub-Stream 2: Infrastructure and Capacity Building Funding**

BH CPs will receive funds under BH CP sub-stream 2 to make infrastructure investments to advance their capabilities to support their member populations and to form partnerships with MCOs and ACOs. Infrastructure funding for BH CPs will be disbursed across four categories:

1. Technology – e.g., HIT and care management software, IT project management resources, data analytics capabilities, mobile technology including tablets, laptops and smartphones for CP staff, service delivery technology such as remote monitoring or electronic medication dispensers, and reporting software
2. Workforce Development - e.g., recruitment support, training and coaching programs and certifications
3. Business Startup Costs – e.g., staffing and startup costs to develop full caseloads.
4. Operational Infrastructure – e.g., project management, system change resources and performance management capabilities, additional operational support.

#### **4.3.3 BH CP Sub-Stream 3: Outcomes-Based Payments**

BH CPs will have the opportunity to earn additional payments under BH CP sub-stream 3 in Budget Periods 3 through 5 by reaching high levels of achievement on avoidable utilization metrics. The State anticipates submitting performance targets to CMS for approval in Q3 CY2021, in alignment with when it anticipates submitting benchmarks to CMS for the avoidable utilization metrics.

#### **4.3.4 LTSS CP Sub-Stream 1: Care Coordination Supports Funding**

MCOs and ACOs will have responsibility for conducting the comprehensive assessment for enrollees assigned to LTSS CPs and other enrollees identified by EOHHS as having LTSS needs, as specified in their contracts with the State. The LTSS CP will review the results of the comprehensive assessment with a LTSS assigned member as part of the person-centered LTSS care planning process and will inform the member about his or her options for specific LTSS services, programs and providers that may meet the member's identified LTSS needs. LTSS CPs will receive funds under LTSS CP sub-stream 1 to perform the following functions for assigned members:

1. Providing disability expertise consultation as requested by MassHealth, the member's MassHealth managed care entity, or the member on the comprehensive assessment
2. Providing LTSS care planning using a person-centered approach and choice counseling
3. Participating on the member's care team to support LTSS care needs decisions and LTSS integration, as directed by the member
4. Providing LTSS care coordination and support during transitions of care
5. Providing health and wellness coaching
6. Connecting the member to social services and community resources.

The State also intends to allow LTSS CPs to provide optional enhanced functions for members with complex LTSS needs who would benefit from comprehensive care management provided by a LTSS CP. The enhanced supports care model will be similar to that of the BH CP, including the performance of a comprehensive assessment, although adapted to the specific LTSS population to be served, and will include a PMPM rate reflective of the BH CP model. The State will select LTSS CPs to perform enhanced supports via a competitive procurement.

#### **4.3.5 LTSS CP Sub-Stream 2: Infrastructure and Capacity Building Funding**

LTSS CPs will receive funds under LTSS CP sub-stream 2 to make investments to advance the organization's overall capabilities to support its member population and form partnerships with MCOs and ACOs. Infrastructure funding for LTSS CPs will be disbursed across four categories:

1. Technology – e.g., HIT and care management software, mobile technology including tablets, laptops and smartphones for CP staff, service delivery technology such as remote monitoring, electronic medication dispensers and reporting software;
2. Workforce Development - e.g., recruitment support, training and coaching programs and certifications;
3. Business Startup Costs – e.g., staffing and startup costs to develop full caseload capacities
4. Operational Infrastructure – e.g., IT project management, system change resources, data analytics capabilities performance management capabilities and additional operational support

#### **4.3.6 LTSS CP Sub-Stream 3: Outcomes-Based Payments**

LTSS CPs will have the opportunity to earn additional payments under LTSS CP sub-stream 3 in Budget Periods 3 through 5 by reaching high levels of achievement on avoidable utilization metrics. The State anticipates submitting performance targets to CMS for approval in Q3 CY2021, in alignment with when it anticipates submitting benchmarks to CMS for the avoidable utilization metrics.



#### 4.3.7 CSA Sub-Stream 1: Infrastructure and Capacity Building Funding

CSAs will receive funds under CSA sub-stream 1 to make investments to advance their overall capabilities to support their member populations and to form partnerships with MCOs and ACOs. Infrastructure funding for CSAs will be disbursed across three categories:

1. Technology – e.g., HIT and care management software, mobile technology including tablets, laptops and smartphones for CP staff, service delivery technology such as remote monitoring, electronic medication dispensers reporting software
2. Workforce Development - e.g., recruitment support, training and coaching programs and certifications;
3. Operational Infrastructure – e.g., IT project management, system change resources, data analytics capabilities performance management capabilities and additional operational support

#### 4.4 Payment Calculation and Timing for ACO Sub-Streams

##### 4.4.1 ACO Sub-Streams 1 & 2: Startup/Ongoing Funding (Primary Care & Discretionary)

Each ACO will receive an amount of Startup/Ongoing funds (combined across sub-streams 1 and 2) for each Budget Period that is determined by multiplying the number of members enrolled in or attributed to the ACO by a per member per month (PMPM) amount. The State will determine the number of members.

The State will determine each ACO’s PMPM amount during the Preparation Budget Period and BP 1 – 5 as follows:

- Step 1: The State will set a base rate
- Step 2: The State will increase this rate for each ACO based on the ACO’s safety net category
  - The State will calculate each ACO’s payer revenue mix based on the percentage of its gross patient service revenue that comes from care for MassHealth members or uninsured individuals
  - The State will categorize ACOs into five categories based on their payer revenue mix (each category has a percentage increase associated with it)
  - During the DSRIP program, the State may adjust the safety net PMPM adjustment methodology as described later in this section
- Step 3: The State will further increase this rate for each ACO based on the ACO’s choice of model and risk track (each model/risk track combination has a percentage increase associated with it – (as detailed in Exhibit 8))

Exhibit 6 shows the State’s anticipated average adjusted PMPMs for the ACO Startup/Ongoing sub-streams, after following the steps described above.

EXHIBIT 6 – Average Adjusted PMPMs for ACO Startup/Ongoing Support

Average Adjusted PMPMs for ACO Startup/Ongoing Support					
Prep BP	BP 1	BP 2	BP 3	BP 4	BP 5
\$21.43	\$19.16	\$18.14	\$14.24	\$9.17	\$3.12

Given the potential for variation in anticipated ACO and member participation, these average adjusted PMPMs represent an estimate, and the State may disburse, on average, PMPMs that differ from the PMPMs displayed in Exhibit 6 by up to +/- \$6. Individual ACO PMPMs may vary by greater amounts due to the adjustments described in this section. If a new ACO joins after BP1, e.g. in BP3, it will have the same BP3 base PMPMs as the existing ACOs and will not be assigned PMPMs differently.

ACOs with a higher percentage of revenue generated from Medicaid and uninsured patient services revenue will be placed into a higher safety net category, corresponding to a larger percentage PMPM increase. To determine each ACO's safety net category, ACOs must submit a payer revenue mix attestation form. The form contains detailed instructions on how to calculate revenue as well as the types of revenue that ACOs must provide. For example, the State requires ACOs to include patient health care service revenue from various categories, which include but are not limited to: (1) MassHealth, inclusive of Medicaid and the Children's Health Insurance Plan, (2) Health Safety Net, (3) Medicare, (4) Commercial Health Plans, (5) Other Government Sources, such as Veterans Affairs and Tricare and (6) Other Revenue Sources, such as Self-pay and Workers' Compensation). Using this information, the State will determine the Gross Patient Service Revenue (GPSR) from MassHealth and uninsured patients and place each ACO in the appropriate safety net category. See Exhibit 7 for the PMPM adjustment schedule based on safety net category.

**EXHIBIT 7 – Safety Net PMPM Adjustment**

Safety Net PMPM Adjustment					
Safety Net Category	5	4	3	2	1
% PMPM Increase	40%	30%	20%	10%	0%

As mentioned earlier, the State may also adjust the safety net PMPM adjustment methodology during the DSRIP program, as follows:

- Startup/ongoing PMPMs for members attributed to community health centers may receive a higher safety net PMPM adjustment (e.g., the maximum safety net adjustment of +40%), as described in Exhibit 7, regardless of the ACO's safety net category, reflecting the unique safety net status of these providers
- Under this revised methodology, startup/ongoing PMPMs for members attributed to other PCPs would receive a PMPM adjustment based on the ACO's overall safety net category (i.e., unchanged from current methodology)

The State will also apply a PMPM adjustment each year depending on the ACO's chosen model and risk track. This adjustment will be additive with the safety net PMPM adjustment. If an ACO switches models or risk tracks during the DSRIP period, then its PMPM adjustment will be updated to align with the new ACO model type. See Exhibit 8 for the PMPM adjustment schedule based on ACO Model and Risk Track.

**EXHIBIT 8 – ACO Model and Risk Track PMPM Adjustment**

ACO Model PMPM Adjustment						
ACO Model	Accountable Care Partnership Plan (Model A)	Primary Care ACO (Model B)		MCO-Contracted ACO (Model C)		
		Risk Track 2 (more risk)	Risk Track 1 (less risk)	Risk Track 3 (more risk)	Risk Track 2 (medium risk)	Risk Track 1 (less risk)
% PMPM Increase	40%	40%	30%	30%	10%	0%

For example, using the standard safety net PMPM adjustment methodology, if the base PMPM rate is \$10, and the ACO is a Primary Care ACO (Risk Track 2) and a safety net category 3 provider, then the adjusted startup/ongoing PMPM would be  $\$10 * (100\% + 40\% + 20\%) = \$16$ . If the State modifies its safety net PMPM adjustment methodology, as described above, and this ACO has 60% of members attributed to community health centers, then the ACO would have two different PMPMs for the members attributed to CHCs vs. other PCPs:



- PMPM for members attributed to CHC:  $\$10 * (100\% + 40\% + 40\%) = \$18$
- PMPM for other members:  $\$10 * (100\% + 40\% + 20\%) = \$16$

The PMPMs would be multiplied by their associated member counts, and the sum of these products would be the ACO’s startup/ongoing funding amount.

The amount of funding that ACOs will need to allocate for primary care investment will be based on the following PMPM schedule:

**PMPM Schedule for Startup/Ongoing Funds (Primary Care Investment)**

	Prep Budget Period	BP1	BP2	BP3	BP4	BP5
Startup/Ongoing Funds Designated for Primary Care Investment (\$PMPM)	\$4	\$4	\$3	\$3	\$1	\$1

All remaining startup/ongoing support (i.e. “discretionary” startup/ongoing funds) can be distributed amongst the ACO’s participating providers, as decided by the ACO. This funding could be used to support additional primary care investment or assessments for members with identified LTSS needs, among other things.

Generally speaking, ACO funding sub-streams 1 and 2 will be paid in four quarterly installments for each Budget Period. The State anticipates these installments will be roughly equal; however, the State may alter the payment amounts, frequency, and timing in its discretion. For example, the State may pay a reduced amount for the first quarterly payment, which may be based on preliminary funding amount calculations, to minimize ACO disruption when funding amounts are finalized and the remaining three payments are adjusted accordingly. During BP5, payments will be attributed to the first half of the year; as such, these attributed amounts will be twice the amount as what they would have been if payments had been attributed throughout the whole BP. For example, if an ACO had \$100 total of non-at-risk startup/ongoing funds for BP5, payments attributed to BP5 would be split between the first two quarters of BP5 (\$50 each), as opposed to \$25 attributed across each of the four quarters of BP5.

If an ACO’s contract with the State is terminated midway through a budget period due to the ACO leaving the ACO program, then the ACO will not receive new startup/ongoing funds for that budget period.

**4.4.2 ACO Sub-Stream 3: Flexible Services Funding**

Each ACO will receive an allotment of flexible services funding for each Budget Period, except for the Preparation Budget Period during which there are no flexible services funds (because ACOs do not yet have enrolled/attributed members). The allotment will be determined on a PMPM basis, as set forth in Exhibit 9. Details for how ACOs will be able to access their Flexible Services funding allotments can be found in the Flexible Services Protocol. The State may redistribute any undisbursed flexible services funding among the other DSRIP funding streams at the State’s discretion, following the same parameters as described in Section 5.1.3 for redistribution of funding not distributed to ACOs, CPs, and CSAs. Any such redistributions would be reported to CMS in the State's quarterly progress reports.

The PMPMs for flexible services allotments are set forth in Exhibit 9. The State may vary these PMPMs in its discretion without obtaining CMS approval. If an ACO’s contract with the State is terminated midway through a budget period due to the ACO leaving the ACO program, then the State at its discretion may provide new flexible services funding to the leaving ACO. If the State decides to provide new flexible services funding to the leaving ACO, then different flexible services base PMPM rates may be used for the leaving ACO and ACOs staying in the program.

EXHIBIT 9 – PMPMs for Flexible Services

PMPMs for Flexible Services					
Prep BP	BP 1	BP 2	BP 3	BP 4	BP 5
\$0.00	\$3.75	\$3.25	\$2.75	\$2.25	\$2.25

4.4.3 ACO Sub-Stream 4: DSTI Glide Path Funding

The amount of DSTI glide path funding the State will pay to each safety net hospital is detailed in Exhibit 10 below.

EXHIBIT 10 – DSTI Glide Path Funding by State Fiscal Year (\$ Millions)

DSTI Glide Path Funding (\$M) by State Fiscal Year						
Hospital Provider	SFY 18	SFY 19	SFY 20	SFY 21	SFY 22	Total
Boston Medical Center	\$23.74M	\$13.53M	\$10.10M	\$7.82M	\$6.30M	<b>\$61.49M</b>
Cambridge Health Alliance	\$12.07M	\$8.45M	\$6.36M	\$4.09M	\$3.00M	<b>\$33.99M</b>
Holyoke Medical Center	\$2.67M	\$1.58M	\$1.22M	\$0.99M	\$0.63M	<b>\$7.09M</b>
Lawrence General Hospital	\$0.58M	\$0.34M	\$0.26M	\$0.20M	\$0.43M	<b>\$1.81M</b>
Mercy Medical Center	\$1.18M	\$0.69M	\$0.53M	\$0.13M	\$0.00M	<b>\$2.54M</b>
Signature Healthcare Brockton Hospital	\$1.04M	\$0.61M	\$0.47M	\$0.37M	\$0.08M	<b>\$2.56M</b>
Steward Carney Hospital	\$1.80M	\$1.00M	\$0.81M	\$0.30M	\$0.05M	<b>\$3.96M</b>

These hospitals will only receive DSTI glide path funding through DSRIP if they participate in a MassHealth ACO, where participation means that the DSTI hospital has a provider arrangement or contract with the ACO that involves financial accountability, including the potential for the safety net hospital to share gains from savings and share responsibility for losses. For the purposes of this glide path funding, a DSTI hospital can only have a provider arrangement or contract with one ACO. This funding is not PMPM-based, but was developed to establish a glide path from current safety net care pool (SNCP) supplemental payments to reduced SNCP payments

This glide path funding needs to be converted from the state fiscal year framework to the Budget Period framework in order to align with the at-risk schedule described in Exhibit 20. Funds for the 6 month Preparation Budget Period for each DSTI hospital will be equal to half of the hospital’s glide path payments in SFY18. Budget Period 1 funds for each DSTI hospital will be equal to the sum of half of the hospital’s glide path payments in SFY18 and SFY19. Budget Periods 2 through 4 for each DSTI hospital will be sourced by the same funding pattern as Budget Period 1. Budget Period 5 funds for each DSTI hospital will be equal to half of the hospital’s glide path payments in SFY22. See Exhibit 11 for a table displaying the DSTI glide path funding by Budget Period.

EXHIBIT 11 – DSTI Glide Path Funding by Budget Period (\$ Millions)

DSTI Glide Path Funding (\$M) by Budget Period							
Hospital Provider	Prep BP	BP 1	BP 2	BP 3	BP4	BP5	Total
Boston Medical Center	\$11.87M	\$18.64M	\$11.81M	\$8.96M	\$7.06M	\$3.15M	<b>\$61.49M</b>
Cambridge Health Alliance	\$6.04M	\$10.27M	\$7.41M	\$5.23M	\$3.55M	\$1.50M	<b>\$33.99M</b>
Holyoke Medical Center	\$1.33M	\$2.12M	\$1.40M	\$1.11M	\$0.81M	\$0.32M	<b>\$7.09M</b>
Lawrence General Hospital	\$0.29M	\$0.46M	\$0.30M	\$0.23M	\$0.32M	\$0.21M	<b>\$1.81M</b>
Mercy Medical Center	\$0.59M	\$0.93M	\$0.61M	\$0.33M	\$0.07M	\$0.00M	<b>\$2.54M</b>
Signature Healthcare Brockton Hospital	\$0.52M	\$0.82M	\$0.54M	\$0.42M	\$0.22M	\$0.04M	<b>\$2.56M</b>
Steward Carney Hospital	\$0.90M	\$1.40M	\$0.91M	\$0.56M	\$0.18M	\$0.03M	<b>\$3.96M</b>

Generally speaking, DSTI glide path funding will be paid in four quarterly installments for each Budget Period. The State anticipates these installments will be roughly equal; however, the State may alter the payment amounts, frequency, and timing in its discretion. During BP5, payments will be attributed to the first half of the year; as such, these attributed amounts will be twice the amount as what they would have been if payments had been attributed throughout the whole BP. For example, if an ACO had \$100 total of non-at-risk DSTI glide path funds for BP5, payments attributed to BP5 would be split between the first two quarters of BP5 (\$50 each), as opposed to \$25 attributed across each of the four quarters of BP5.

If a DSTI hospital has an affiliated provider arrangement or contract with an ACO whose contract with the State ends midway through a budget period due to the ACO leaving the ACO program, and the DSTI hospital does not enter into a contract or other arrangement with a different ACO and bear risk through ACO participation for the remainder of the budget period, then that DSTI hospital will not receive DSTI Glide Path Funding for the entirety of that budget period. If the DSTI hospital enters into a contract or other arrangement with a different ACO and bears risk through ACO participation, then the leaving ACO will receive half of the non-at-risk DSTI Glide Path funding to pay to the DSTI hospital during the first half of the budget period, as well as the earned at-risk funding that is tied to the first half of the budget period once the ACO DSRIP accountability scores are calculated. Once the DSTI hospital joins a new ACO, it may receive the remainder of its DSTI glide path funding for that budget period. The ACO DSRIP accountability scores (see Section 5.3) used to calculate the amount of at-risk DSTI glide path funding earned for the first and second halves of the year in which the ACO leaves will be the scores earned by the DSTI hospital’s original and new ACOs in that budget period, respectively.

**4.4.4 Detail on calculating member-months**

Each ACO will be accountable for a defined population of members. Because ACOs’ responsibilities scale with their populations, the State will use the size of this population to determine the amount of Startup/Ongoing funding and the Flexible Services allotment for each ACO. For Partnership Plans and Primary Care ACOs, the number of members is simply the number of members enrolled in each ACO. Eligible MassHealth members will either choose to enroll or be assigned to these ACOs. MassHealth records members’ enrollments in the agency’s MMIS system and Data Warehouse. The State will tally a count of members enrolled in each ACO based on this record; this count will be multiplied by the DSRIP PMPM values to calculate the payment amounts per ACO.

For MCO-Administered ACOs, the State will use the number of members attributed to each ACO for the purposes of cost and quality accountability. These attributed members are the subset of MassHealth MCO enrollees who have primary care assignments in their MCOs to PCPs who participate in MCO-Administered ACOs. Massachusetts will know who these Participating PCPs are for each MCO-Administered ACO, and will record this information in its Data Warehouse. Each MCO will report to the State on a regular basis the primary care assignments for the MCO's enrollees. The State will use this information to determine the number of MCO enrollees who have primary care assignments to each MCO-Administered ACO; this number will be multiplied by the DSRIP PMPM values to calculate the payment amounts per MCO-Administered ACO.

The State may use a point-in-time ("snapshot") count of members for each ACO, or may calculate the average members each ACO has over a particular period (e.g., the most recent quarter) in order to ensure DSRIP payment calculations are robust to temporary fluctuations in member enrollments. Once Massachusetts has selected ACOs and is able to perform more analytics on historical ACO-level member enrollment movement, Massachusetts intends to finalize such operational details of this calculation.

## 4.5 Payment Calculation and Timing for CP and CSA Sub-Streams

### 4.5.1 BH CP Sub-Stream 1: Care Coordination Supports Funding

The State will pay each BH CP a PMPM rate for care coordination supports for each member assigned to and engaged with the BH CP during the month. The PMPM rate has been developed to account, in part, based on the staff required to support the BH CP model, including the need for Registered Nurses, licensed clinicians, and access to a medical director for the performance of supports such as comprehensive assessments and medication reconciliation, as well as community health workers, health outreach workers, peer specialists and recovery coaches for the SMI and/or SUD population. Caseloads for each BH CP are expected to be between 35-50 engaged enrollees per FTE. The rate is anticipated to be \$180 PMPM. The State anticipates that the rate will remain constant for the first two years of the program, at which time the State plans to evaluate the program and revisit the PMPM rate. The State may vary the amount of the PMPM in its discretion at any time during the demonstration.

The State will pay the PMPM rate to the BH CP for each month in which the BH CP performs and documents a qualifying activity, beginning in the month when the member is assigned to the BH CP. If the BH CP does not perform any qualifying activities during a month, it will not be paid for that month. A BH CP will be paid for outreach only during the first 90 days of a member's assignment to the BH CP if outreach is attempted and documented during that 90-day period. For members assigned to a BH CP between July 1, 2018 and October 31, 2018, inclusive, the BH CP may be paid for qualifying activities other than outreach during the first 10 months of a member's assignment. After the first 10 months of assignment, the State will not make payments to a BH CP for qualifying activities performed for a member, unless that member is engaged. For members assigned to a BH CP beginning November 1, 2018, the BH CP may be paid for qualifying activities other than outreach during the first 150 days of a member's assignment. After the first 150 days of assignment, the State will not make payments to the BH CP for any qualifying activities performed for a member, unless that member is engaged. A member is considered engaged with the BH CP when a comprehensive assessment is completed and care plan is approved by the member's PCP or PCP designee. The PCP may designate appropriate MCO or ACO clinical staff as the PCP designee. The BH CP must coordinate with the member's PCP or PCP designee, as appropriate, in performing qualifying activities, such as to support or review medication reconciliation for the member, including during the first 10 months of assignment. The State will report to CMS in its quarterly and annual reports the BH CP engagement rates, as data are available.

Example payment calculation with PMPM of \$160:

Example payment amount for one month = (Total number of members assigned but not engaged + total number of members engaged)\*\$160

**4.5.2 BH CP Sub-Stream 2: Infrastructure and Capacity Building Funding**

Each BH CP will receive an initial amount of infrastructure and capacity building funds during the Preparation Budget Period. BH CPs will propose allocation of funds across the four categories listed in section 4.3.2 in their Preparation Budget Period Budgets and Budget Narratives. The State anticipates disbursing up to \$500,000 to each BH CP for initial infrastructure funding. The State may adjust the amount of the Preparation Budget Period funds disbursed to BH CPs in its discretion.

For Budget Period 1, BH CPs will receive infrastructure funds based on the anticipated number of engaged members, as determined by the State. For Budget Period 2 through 5, BH CPs will receive infrastructure funds based on the number of enrolled members (both assigned and engaged), as determined by the State. Exhibit 12 sets forth the anticipated PMPM schedule for BH CP infrastructure and capacity building funding. The State anticipates making infrastructure payments on a bi-annual basis, except during BP1 and BP5. During BP1, the State anticipates making only one payment to BH CPs and CSAs. During BP5, payments will be attributed to the first half; as such, the attributed amount will be twice the amount as what each bi-annual payment would have been if payments had been attributed throughout the whole BP. For example, if a CP had \$100 total of non-at-risk infrastructure and capacity building funding for BP5, the total payment would be attributed to the first half of BP5.

**EXHIBIT 12 – Anticipated Schedule for BH CP for Infrastructure and Capacity Building (PMPM)**

BH CP Infrastructure and Capacity Building PMPMs				
BP 1	BP 2	BP 3	BP 4	BP 5
\$35.00 - \$45.00	\$25.00 - \$35.00	\$15.00 - \$25.00	\$10.00 - \$20.00	\$5.00 - \$15.00

The State may vary the amount of the infrastructure PMPMs in its discretion.

As part of the Budget and Budget Narratives, BH CPs will indicate how they intend to use the infrastructure funding for amounts up to a maximum amount of possible funding (i.e., the CP’s PMPM multiplied by the number of members engaged). The State may approve a lower amount based on its review of the Budgets and Budget Narratives.

For example, for a BH CP with 1,000 engaged members with a PMPM of \$40.00:

Maximum amount of Budget Period 1 Infrastructure Funds = \$40.00\*12\*1000 = \$480,000

**4.5.3 BH CP Sub-Stream 3: Outcomes-Based Payments**

Starting in Budget Period 3, the State will designate an annual pool of funding to award to high performing BH CPs based on metrics related to avoidable utilization (see Section 5.4.5). The State anticipates this pool to be approximately \$1M annually, but may vary this amount in its discretion. The State will set the achievement standards following analysis of baseline data from Performance Year 1 and Performance Year 2, subject to CMS approval. The total bonus the State allots yearly will be divided amongst the CPs that meet or exceed the achievement standards based on the number of CPs that meet or exceed the achievement standards. See Section 5.4.5 for more details about how the funding will be distributed to the eligible CPs. The State will not require CPs to submit budgets for Outcomes Based Payments.

**4.5.4 LTSS CP Sub-Stream 1: Care Coordination Supports Funding**

The State will pay each LTSS CP a PMPM rate for care coordination supports for each member assigned to and engaged with the LTSS CP during the month. The PMPM rate has been developed, in part, based on the staff required to support the LTSS CP model, including the need for care coordinators with appropriate supervision at sufficient staffing levels to perform LTSS CP supports. Caseloads for LTSS CPs are expected to be between 70-100 engaged enrollees per FTE. The rate is anticipated to be \$80 PMPM for each member assigned and engaged with the LTSS CPs during the month. The State will set an additional PMPM for enhanced LTSS CP functions and anticipates caseload for enhanced LTSS CP supports to be 35-50 engaged



enrollees. The State may vary the amount of the PMPMs in its discretion at any time during the demonstration.

The State will pay the PMPM rate to the LTSS CP for each month in which the LTSS CP performs and documents a qualifying activity, beginning in the month when the member is assigned to the LTSS CP. If the LTSS CP does not perform any qualifying activities during a month, it will not be paid for that month. An LTSS CP will be paid for outreach only during the first 90 days of a member’s assignment to the LTSS CP if outreach is attempted and documented during that 90-day period. For members assigned to an LTSS CP between July 1, 2018 and October 31, 2018, inclusive, the LTSS CP may be paid for qualifying activities other than outreach during the first 10 months of a member’s assignment. After the first 10 months of assignment, the State will not make payments to an LTSS CP for qualifying activities performed for a member, unless that member is engaged. For members assigned to an LTSS CP beginning November 1, 2018, the LTSS CP may be paid for qualifying activities other than outreach during the first 150 days of a member’s assignment. After the first 150 days of assignment, the State will not make payments to the LTSS CP for any qualifying activities performed for a member, unless that member is engaged. A member is considered engaged with the LTSS CP when the person-centered care plan is approved by the member’s PCP or PCP designee. The PCP may designate appropriate MCO or ACO clinical staff as the PCP designee. The LTSS CP must coordinate with the member’s PCP or PCP designee, as appropriate, in performing qualifying activities, including during the first 10 months of assignment. The State will report to CMS in its quarterly and annual reports the LTSS CP engagement rates, as data are available.

Example payment calculation with PMPM of \$80:

Example payment amount for one month = (Total number of members assigned but not engaged + total number of members engaged)\*\$80

**4.5.5 LTSS CP Sub-Stream 2: Infrastructure and Capacity Building Funding**

Each LTSS CP will receive an initial amount of infrastructure and capacity building funds during the Preparation Budget Period. LTSS CPs will propose allocation of funds across the four categories listed in section 4.3.2 in their Preparation Budget Period Budgets and Budget Narratives. The State anticipates disbursing up to \$500,000 to each LTSS CP for initial infrastructure funding. The State has the discretion to adjust the amount of the Preparation Budget Period funds disbursed to LTSS CPs without obtaining CMS approval.

For Budget Period 1, LTSS CPs will receive infrastructure funds based on the anticipated number of members engaged, as determined by the State. For Budget Period 2 through 5, LTSS CPs will receive infrastructure funds based on the number of enrolled members (both assigned and engaged), as determined by the State. The State anticipates making infrastructure payments on a bi-annual basis, except during BP1 and BP5. During BP1, the State anticipates making only one payment to LTSS CPs. During BP5, payments will be attributed to the first half; as such, the attributed amount will be twice the amount as what each bi-annual payment would have been if payments had been attributed throughout the whole BP. For example, if a CP had \$100 total of non-at-risk infrastructure and capacity building funding for BP5, the total payment would be attributed to the first half of BP5.

**EXHIBIT 13 – Anticipated Schedule for LTSS CP for Infrastructure and Capacity Building (PMPM)**

<b>LTSS CP Infrastructure and Capacity Building PMPMs</b>				
<b>BP 1</b>	<b>BP 2</b>	<b>BP 3</b>	<b>BP 4</b>	<b>BP 5</b>
\$30.00 - \$40.00	\$20.00 - \$30.00	\$10.00 - \$20.00	\$8.00 - \$18.00	\$5.00 - \$15.00

The final PMPM will vary based on actual overall enrollment in CPs. The State may vary the amount for the PMPM without CMS approval.

CPs will submit Budgets and Budget Narratives for approval for amounts up to a maximum amount of PMPM \* number of members engaged. The State will review and revise budgets as appropriate.

For example, for a LTSS CP with 1,000 engaged members with a PMPM of \$35.00:

$$\text{The maximum amount of Budget Period 1 Infrastructure Funds} = \$35.00 * 12 * 1000 = \$420,000$$

The State may approve a lower amount based on its review of the Budget and Budget Narrative, without CMS approval.

#### 4.5.6 LTSS CP Sub-Stream 3: Outcomes-Based Payments

Starting in Budget Period 3, the State will designate an annual pool of funding (anticipated to be approximately \$500,000 annually) to award to high performing LTSS CPs based on metrics related to avoidable utilization (see Section 5.4.5). The State will set the achievement standards following analysis of baseline data from Performance Year 1 and Performance Year 2, subject to CMS approval. Total bonus allotted yearly will be divided amongst the CPs that meet or exceed the achievement standards based on the number of CPs that meet or exceed the achievement standards. See Section 5.4.5 for more details about how the funding will be distributed to the eligible CPs. The State will not require CPs to submit budgets for Outcomes Based Payments.

#### 4.5.7 CSA Sub-Stream 1: Infrastructure and Capacity Building Funding

CSAs will receive an initial amount of infrastructure and capacity building funds during the Preparation Budget Period of between \$75,000 and \$350,000. The State will categorize CSAs based on the number of members they serve and the number of CSA contracts held and will advise CSA of their budget for the Preparation Budget Period. CSAs will propose allocation of funds across the three infrastructure categories listed in section 4.3.7 in their Preparation Budgets and Budget Narratives. The State will then disburse initial infrastructure funding to CSAs based on the approved budget. The State may adjust the amount of the Preparation Budget Period funds disbursed to CSAs in its discretion.

Exhibit 14 sets forth the anticipated PMPM schedule for CSA infrastructure and capacity building funding. The State may vary the infrastructure PMPM amount in its discretion.

EXHIBIT 14 – Anticipated Schedule for CSAs for Infrastructure and Capacity Building (PMPM)

CSA Infrastructure and Capacity Building PMPMs				
BP 1	BP 2	BP 3	BP 4	BP 5
\$35.00 - \$45.00	\$25.00 - \$35.00	\$15.00 - \$25.00	\$10.00 - \$20.00	\$5.00 - \$15.00

The State anticipates making infrastructure payments on a bi-annual basis, except during BP1 and BP5. During BP1, the State anticipates making only one payment to CSAs. During BP5, payments will be attributed to the first half; as such, the attributed amount will be twice the amount as what each bi-annual payment would have been if payments had been attributed throughout the whole BP. For example, if a CSA had \$100 total of non-at-risk infrastructure and capacity building funding for BP5, the total payment would be attributed to the first half of BP5.

#### 4.6 Statewide Investments Funding Determination Methodology

The DSRIP Statewide Investment funding stream may be utilized by the State to fund the following initiatives: (1) Student Loan Repayment Program, (2) Primary Care Integration Models and Retention, (3) Investments in Primary Care Residency Training, (4) Workforce Development Grant Program, (5) Technical Assistance, (6) Alternative Payment Methods Preparation Fund, (7) Enhanced Diversionary Behavioral Health Activities and (8) Improved Accessibility for People with Disabilities or for Whom English Is Not a Primary Language. Exhibit 15 shows the anticipated funding breakdown for each initiative by demonstration year.

EXHIBIT 15 – Statewide Investments Funding Breakdown

Statewide Investments	Y1	Y2	Y3	Y4	Y5	Total
Student Loan Repayment Program	\$3.9M	\$5.5M	\$3.2M	\$3.5M	\$2.3M	\$18.4M
Primary Care Integration Models and Retention	\$1.7M	\$1.9M	\$1.5M	\$1.2M	\$1.0M	\$7.3M
Investment in Primary Care Residency Training	\$0.2M	\$1.1M	\$2.7M	\$2.1M	\$2.4M	\$8.4M
Workforce Development Grant Program	\$1.7M	\$2.9M	\$ .8M	\$4.1M	\$2.4M	\$11.9M
Technical Assistance for ACOs and CPs	\$10.3M	\$10.6M	\$5.6M	\$11.3M	\$6.2M	\$44.0M
Alternative Payment Methodology Preparation Funds	\$2.2M	\$0.0M	\$0.0M	\$8.5M	\$1.2M	\$11.9M
Enhanced Diversionary Behavioral Health Activities	\$1.3M	\$0.0M	\$0.0M	\$1.9M	\$0.0M	\$3.2M
Improved Accessibility for Members with Disabilities or for Whom English Is Not a Primary Language	\$0.3M	\$2.4M	\$ .5M	\$4.7M	\$2.0M	\$9.9M
<b>Total</b>	\$21.6M	\$24.4M	\$14.2M	\$37.3M	\$17.4M	\$114.8M

\*Displayed numbers are rounded; therefore, totals and updated expenditure authority numbers may not add up exactly

The State may shift funding among and within the eight Statewide Investment initiatives at its discretion, such that the funding totals for each initiative identified in Exhibit 15 and in initiative descriptions in Appendix B may change. The State must obtain CMS approval for any funding shifts within a demonstration year from one investment to another if the shifted amount is (1) greater than 15% of the original funding amount for the investment contributing the shifted amount or (2) if the shifted amount is greater than \$1M, whichever is greater. Otherwise, the State will notify CMS of any funding shifts in its quarterly reports.

Sections 4.6.1 – 4.6.8 discuss the general nature and funding methodology of each Statewide Investment initiative, including which entities or providers will be eligible to apply for DSRIP funds. Appendix B provides additional details on each initiative.

**4.6.1 Student Loan Repayment Program**

The student loan repayment program will repay a portion of awardees’ student loans in exchange for a minimum of an 18 month commitment to work in a community setting. Applicants may either be individual providers working at community mental health centers, or the centers themselves. The program will offer a specified amount of funding in each recipient category per year. Provider applicants may be eligible for different amounts of loan repayment based on their discipline and credentialing level. For providers selected to receive awards, the State will pay their student loan servicer directly. The anticipated provider categories and maximum award amounts are as follows:

- Primary Care Physician – Each awardee is eligible for up to \$50K in total student loan repayments
- Psychiatrists and psychologists – Each awardee is eligible for up to \$50K in total student loan repayments
- Advance Practice Registered Nurses, Physician Assistants and Nurse Practitioners – Each awardee is eligible for up to \$30K in total student loan repayments
- Licensed Social Workers, Licensed Behavioral Health Professionals, and Masters-Prepared Unlicensed Social Workers and Behavioral Health Professionals – Each awardee is eligible for up to \$30K in total student loan repayments
  - Among other eligibility requirements determined by the State, Master-Prepared Unlicensed Social Workers and Behavioral Health Professionals must expect to obtain their license within twelve months from application submission.



- Behavioral Health Professionals (community health workers, peer specialists, recovery support specialists) – Each awardee is eligible for up to \$20K in total student loan repayments

The State may vary the provider categories and award amounts in its discretion. The State may also develop enhancements to the student loan repayment program, such as learning collaboratives that engage distinct cohorts of student loan repayment recipients, which provide additional training and mentorship for providers and deepen their commitment to careers in community settings. The State will define application criteria and eligibility, and then select awardees through a competitive process that will allow the State to evaluate the applicants relative to the criteria established.

#### **4.6.2 Primary Care Integration Models and Retention**

The investment in primary care integration models and retention will support a grant program to community health centers (CHCs), community mental health centers, and entities participating in CPs and CSAs that allows primary care and behavioral health providers to design and carry out one-year projects related to accountable care. The State will define application criteria and eligibility, and will select awardees through a competitive process that will allow the State to evaluate the proposed projects for scope, impact, feasibility, cost and need, among other factors. The State anticipates that awardees will receive up to \$40K per project but the amount of funding may vary by project, as determined by the State. The CHC, CMHC, or entity participating in a CP or CSA will be the primary applicant with a primary care or behavioral health provider as a partner. The State will disburse funds directly to the CHC, CMHC, or entity participating in a CP or CSA.

#### **4.6.3 Investment in Primary Care Residency Training**

The investment in primary care residency training will help offset hospital and community health center costs of filling community health center (CHCs) and community mental health center (CMHC) residency slots. The State will fund hospitals, community health centers, and community mental health centers that are selected for awards. Hospitals and CHCs/CHMCs will apply jointly for the award in the case of PCPs. The State anticipates that funding will vary based on the resident's discipline as follows:

- Primary Care Provider (PCP) – For each PCP residency slot filled, the State will pay the community health center or community mental health center up to \$150K and the hospital up to \$20K for a total of up to \$170K for each year of residency.
- Nurse Practitioner (NP) – For each NP residency slot filled, the State will pay the community health center or community mental health center up to \$85K for each year of residency.

The State will define application criteria and eligibility, and then select awardees through a competitive process that allows the State to evaluate the applications relative to the criteria established.

#### **4.6.4 Workforce Development Grant Program**

The workforce development grant program will support a range of activities to increase and enhance the State's healthcare workforce capacity (e.g., creation or support for workforce training programs, help providers to attend educational events, help ACOs/CPs/CSAs develop programs (one-on-one and group), outreach to potential workforce). The State will administer the funded activities with internal staffing resources, or designees determined through competitive procurements, interagency service agreements (ISAs) or other means. The State will determine the funding amounts for various activities within this initiative based on project scope, impact, feasibility, cost and need, among other criteria.

#### **4.6.5 Technical Assistance for ACOs, CPs and CSAs**

The technical assistance (TA) program aims to provide ACOs, CPs and CSAs with the training and expertise necessary to implement evidence-based interventions that meet the needs of the new healthcare

landscape. For entities that apply and are awarded funding, the State will pay their TA vendor(s) directly. The State will also use this TA funding to invest in resources to ensure the long-term sustainability of the TA provided to eligible recipients.

Recipients may be required to contribute a certain percentage (e.g., up to 30 percent) of the overall TA costs, which will create an incentive for the recipient to work diligently with the TA vendors and the State to effect change.

TA funding may be allocated to ACOs, CPs and CSAs on a PMPM basis, or based on other factors, such as experience with alternative payment methodologies, or the number of entities receiving TA funding. If the State decides to allocate TA funding based on PMPM amount, the State could set the PMPM amount and may vary the amount in its discretion, for example, based on enrollment or TA applicant volume. The TA funding amount will represent a funding cap; i.e., the State will not award more than this amount to a recipient, but may ultimately pay less than the full TA funding allocation if the recipient's TA costs are lower than anticipated. The State may redistribute or reallocate unused TA funding in its discretion. If the overall cost of TA exceeds the TA funding allocation and recipient contribution combined, the recipient will be responsible for covering the excess cost. For example, if an ACO is required to pay 30% of the overall TA cost and is allocated \$700,000 in TA funding:

- ACO could propose TA plan costing \$1,000,000
  - ACO pays \$300,000 and the State pays \$700,000
- ACO could propose TA plan costing \$1,100,000
  - ACO pays \$400,000 and the State pays \$700,000
- ACO could propose TA plan costing \$900,000
  - ACO pays \$270,000 and the State pays \$630,000
  - State may redistribute or reallocate remaining \$70,000 funding at its discretion

In order to receive TA funds, applicants must submit a detailed TA plan that explains how funding will be used and demonstrates that funding is not duplicative of TA efforts supported by other funding sources (e.g., federal, state, private). The State will evaluate the proposed plans for scope, impact, feasibility, cost and need, among other factors prior to approval.

#### **4.6.6 Alternative Payment Methods (APM) Preparation Fund**

The APM preparation fund will support providers who are not yet ready to participate in an APM but demonstrate interest in and intent to participate in the near future. The State will define application criteria and eligibility, and will select awardees through a competitive process that will allow the State to evaluate the proposed projects for scope, impact, feasibility, cost and need, among other factors. The State will determine the funding amounts based on its evaluation of successful applications. The APM preparation fund may also be used to raise awareness about APM among providers not yet engaged in a MassHealth ACO, CP, or CSA.

#### **4.6.7 Enhanced Diversionary Behavioral Health Activities**

The investment in enhanced diversionary behavioral health activities will support the implementation of strategies to ensure members with behavioral health needs receive care in the most appropriate, least restrictive settings. The State will consider a broad spectrum of strategies for investment (e.g., technological solutions to facilitate providers' access to patients' medical histories upon arrival to the ED, data collection and analysis platforms, etc.).

The State will administer the funded activities with internal staffing resources, or designees determined through competitive procurements, interagency service agreements (ISAs) or other means. The State will determine the funding amounts for various activities within this initiative based on project scope, impact, feasibility, cost and need, among other criteria.

#### **4.6.8 Improved Accessibility for People with Disabilities or for whom English is not a Primary Language**

This investment will fund programs to support providers in the acquisition of equipment, resources and expertise that meet the needs of people with disabilities or for whom English is not a primary language. The State will consider a broad spectrum of strategies for investments (e.g., funding for purchasing items necessary to increase accessibility for members, accessible communication assistance and development of educational materials for providers and members).

The State will administer the funded activities with internal staffing resources, or designees determined through competitive procurements, interagency service agreements (ISAs) or other means. The State will determine the funding amounts for various activities within this initiative based on project scope, impact, feasibility, cost and need, among other criteria.

#### **4.7 DSRIP Carry Forward**

Given that a significant portion of DSRIP funds will be disbursed on a PMPM basis, lower than anticipated member participation in the ACO or CP programs may lead to lower actual expenditures in a given DSRIP year. Therefore, the State may carry forward prior year DSRIP expenditure authority from one year to the next for reasons related to member participation fluctuations. This carry forward authority will extend to the following funding streams; as these areas are directly related to and impacted by member participation fluctuation.

- All ACO funding streams
- All CP funding streams
- Statewide Investments: technical assistance and workforce development grant programs
- State operations/implementation

The State may carry forward the DY2 and DY3 funding for the APM Preparation Fund and the Enhanced Diversionary Behavioral Health Activities Program, and the DY3 funding for the technical assistance program, workforce development grant program, and the Improved Accessibility for Members with Disabilities or for Whom English Is Not a Primary Language statewide investment into DY4 without counting against the carryforward 15% benchmark described in STC 60(d)(ii).

The State does not have carry forward authority for other funding streams within statewide investments.

Per STC 60(d)(ii), if the expenditure authority carried forward from one year to another is more than 15% of the prior year's expenditure authority as set forth in Exhibit 1, then the State will submit a request to carry forward the expenditure authority for review and approval by CMS. Flexible Services funding will not be included in expenditure authority carry forward calculations. CMS will respond to the State's request within 60 business days. If approved, the State will provide an updated funding allocation table to CMS in the next quarterly progress report to CMS. If the carry forward amount is less than or equal to 15% of the prior year's expenditure authority, then the State will provide an updated funding allocation table to CMS in the next quarterly progress report to CMS. The State must ensure that carry over does not result in the amount of DSRIP expenditure authority for DSRIP Year 5 being greater than the amount for DSRIP Year

4. Flexible Services funding will not be counted in either the DSRIP Year 4 or DSRIP Year 5 expenditure authority amounts for the purposes of this comparison.

## **Section 5. DSRIP Accountability Framework (State Accountability to CMS; ACO, CP and CSA Accountability to State)**

### **5.1 Overview**

The State has structured an accountability framework for its DSRIP program, under which the State is accountable to CMS for the State's achievement of delivery system reform goals. The State's failure to achieve the standards set for these goals may result in the loss of DSRIP expenditure authority according to the at-risk schedule set forth in STC 71(b). Any lost expenditure authority will result in parallel reduced DSRIP expenditures by the State. If the State experiences reduced expenditure authority from CMS, the State has discretion to determine whether and to what extent to reduce any of the four funding streams to best meet the State's programmatic needs while adhering to the State's DSRIP expenditure authority.

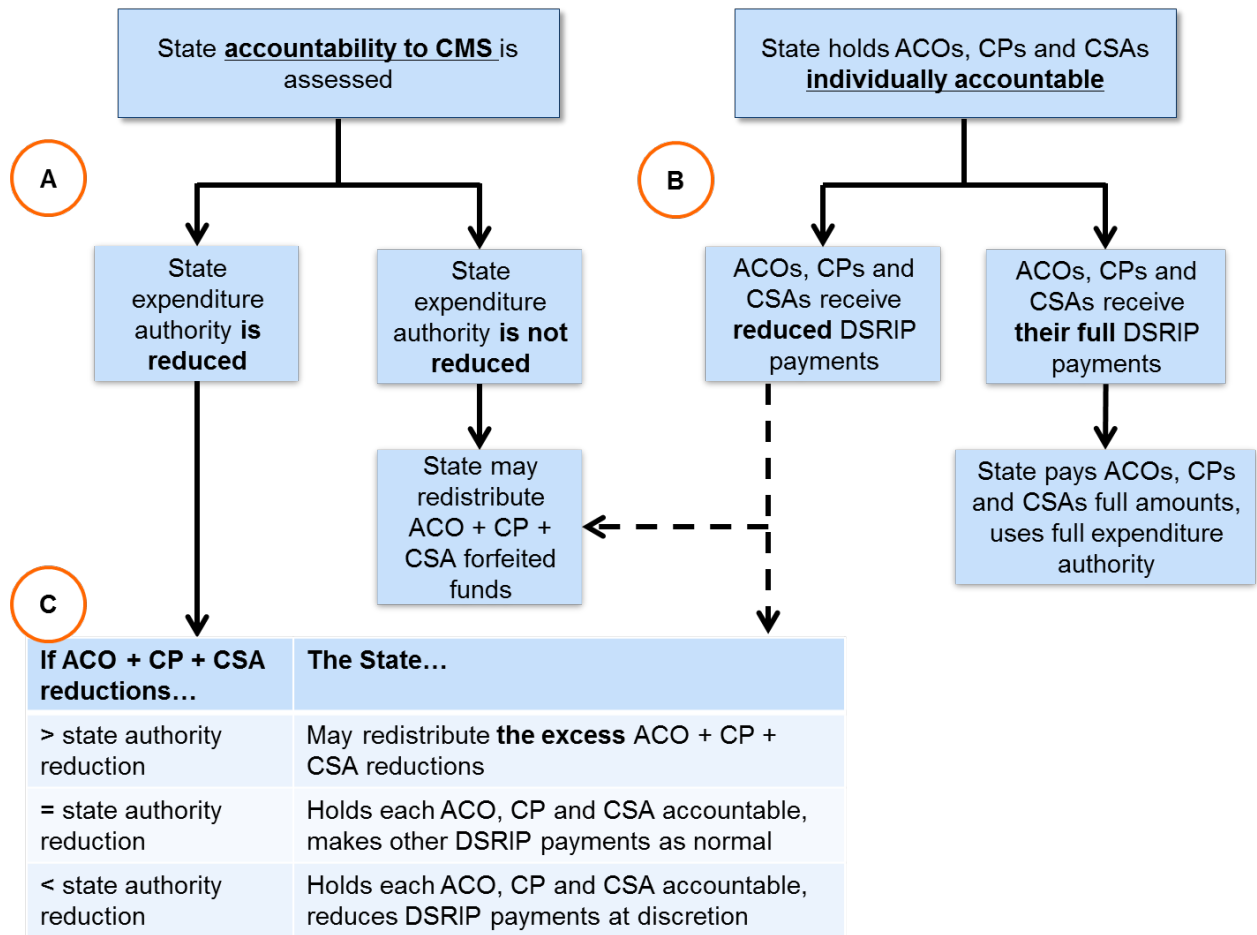
Separately, to maximize incentives for delivery system reform, ACOs, CPs and CSAs that receive DSRIP funds are each accountable to the State for their individual performance. An ACO's, CP's or CSA's failure to achieve the individual accountability standards set by the State may result in the ACO, CP or CSA receiving less DSRIP funding from the state. Any reduction in DSRIP funding experienced by an individual ACO, CP or CSA will not necessarily impact the State's overall DSRIP expenditure authority under the demonstration.

Exhibit 16 below illustrates the State's accountability to CMS, and also illustrates ACOs', CPs' and CSAs' accountability to the State and how these two accountability mechanisms interact.

This section will describe each step of these accountability mechanisms as follows:

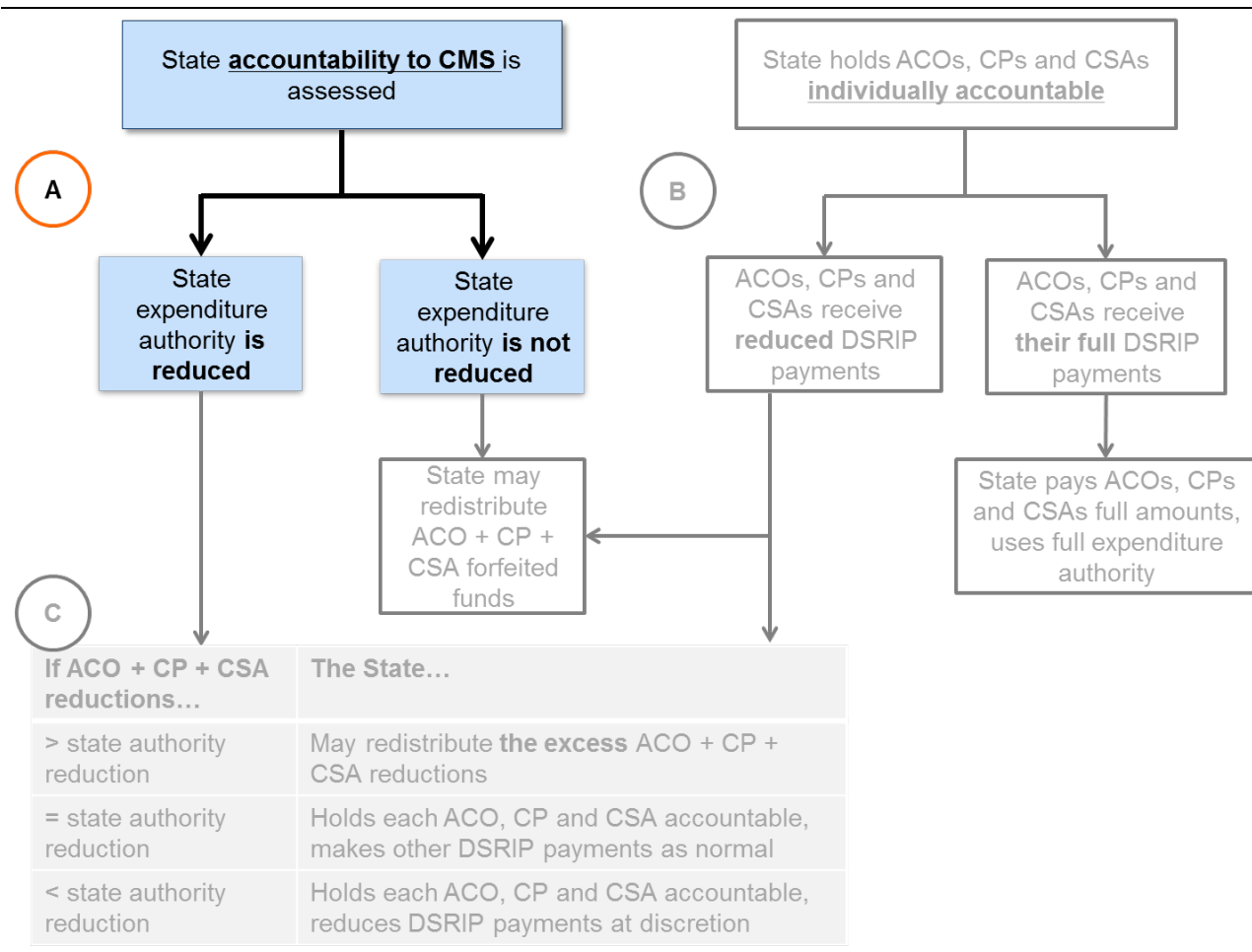
- Section 5.1: provides an overview of DSRIP Accountability Framework for the State to CMS and ACOs, CPs and CSAs to the State
- Section 5.2: provides detail on State Accountability to CMS
- Section 5.3: provides detail on accountability framework and performance based payments for ACOs
- Section 5.4: provides detail on accountability framework and performance based payments for CPs and CSAs
- Section 5.5: outlines reporting requirements for ACOs, CPs and CSAs

EXHIBIT 16 – Process Flow for State Accountability to CMS and Accountability of ACOs, CPs, and CSAs to the State



### 5.1.1 State Accountability to CMS

EXHIBIT 17 – Process Flow for State Accountability to CMS



A portion of the State’s DSRIP expenditure authority will be at-risk based on the State’s DSRIP Accountability Score according to the schedule set forth in STC 71(b). The portion of the State’s DSRIP expenditure authority that is at-risk will follow the same at-risk Budget Period structure as for the ACOs, CPs and CSAs.

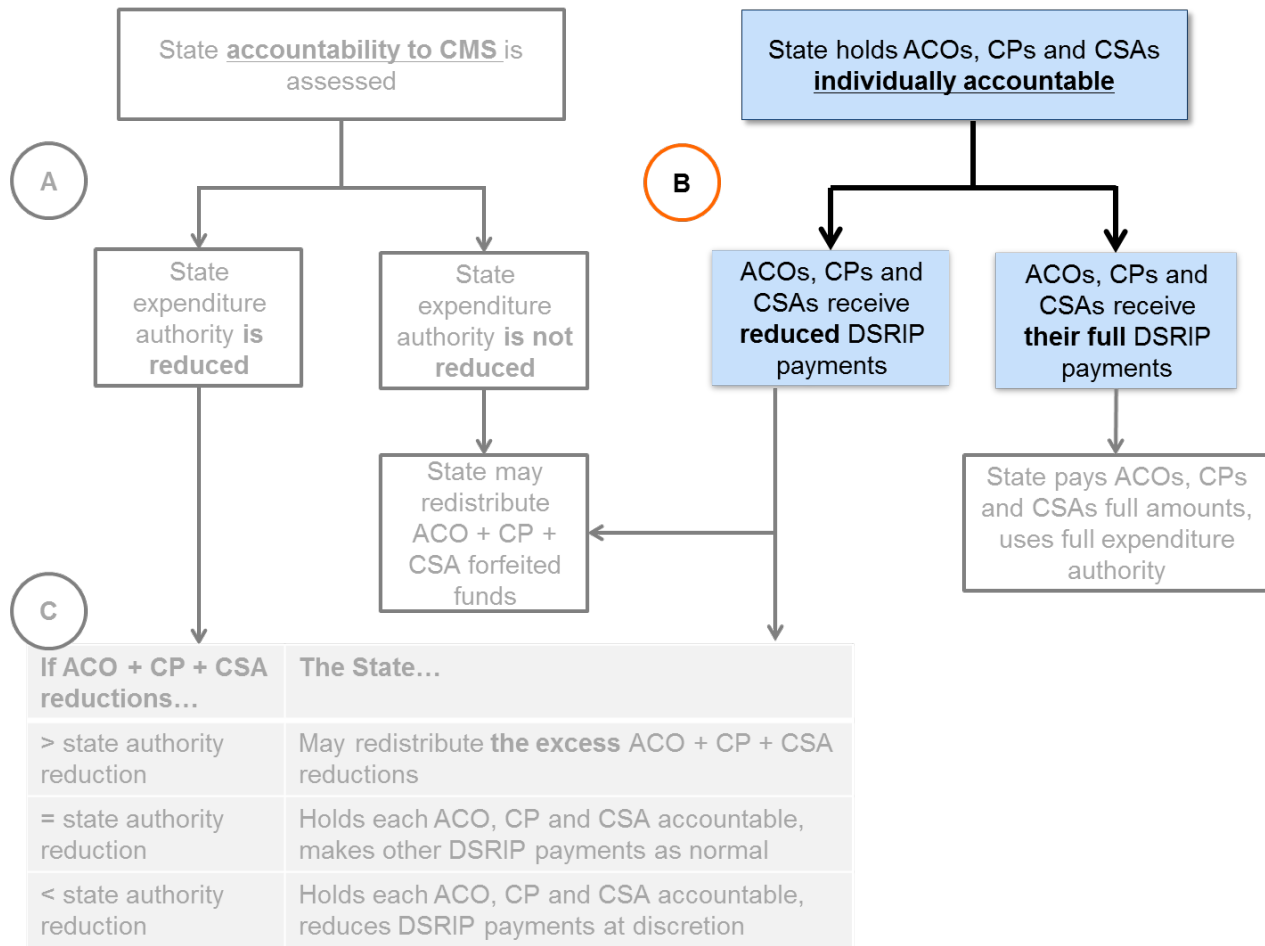
The Preparation Budget Period and BP1 will not have any at-risk expenditure authority. BP 2 has at-risk expenditure authority, and the State anticipates that its Accountability Score will not be determined until the second quarter of BP4 at the earliest. Thus, the State anticipates that any reduced expenditure authority may be reflected in the State’s reduction of DSRIP payments during BP 5. As an example, if the State’s Accountability Score for BP 2 is 70%, then the State will lose the remaining 30% of its \$20.625M of BP 2 at-risk expenditure authority (i.e., \$6.1875M). The State may reflect this by subtracting up to \$6.1875M from its anticipated \$112M BP 5 DSRIP expenditure authority.

The State may also satisfy any reductions in DSRIP expenditure authority through retroactive recoupments from recipients of DSRIP funds, or through the State paying CMS back for any Federal Financial Participation the State retroactively owes for such reductions. For example, for Budget Periods 4 and 5, the State anticipates that there will be no upcoming Budget Periods for which to reduce DSRIP expenditures by the time the Accountability Scores for these Budget Periods are calculated; the State may therefore satisfy any reductions in DSRIP expenditure authority for these Budget Periods through such recoupments, through paying CMS back, or through identifying other cost savings in the DSRIP program, such as in the statewide investments or implementation/oversight funding streams.

If the State decides to recoup funding from ACOs or CPs, then it will first distribute the recoupment amounts among the ACOs and CPs as a class. One potential approach for this initial distribution is to divide the recoupment amount according to the 5-year DSRIP expenditure authority for the ACO and CP funding streams, as detailed in Table G of the STCs (i.e., ACOs: \$1,065.6M, or 66.1%; CPs: \$546.6M, or 33.9%). To determine how much funding is recouped from individual ACOs, the State may take each ACO's DSRIP Accountability Score and calculate the difference from 100%. The State will then calculate a weight for each ACO that is equal to that ACO's "difference from 100%" divided by the summed total of all the ACOs' "difference from 100%". That weight will then be multiplied by the ACO portion of the recoupment amount to determine the amount of funding that the State will recoup from the ACO. As an example, if the State needs to recoup \$100 for BP4, then it will first divide the recoupment between the ACOs and CPs according to Table G of the STCs (i.e., ACOs and CPs will need to pay back \$66.10 and \$33.90, respectively). If there are two ACOs, and ACO 1 scored a 90%, and ACO 2 scored a 60% (corresponding to "differences from 100%" of 10% and 40%, respectively), then ACO 1 would need to pay back  $\$66.10 * (10\% / (10\% + 40\%)) = \$13.22$ , and ACO 2 would need to pay back  $\$66.10 * (40\% / (10\% + 40\%)) = \$52.88$ . The State may implement a different methodology for recouping funds from CPs and CSAs. The State will make a final determination of its recoupment methodology once it decides that it will recoup funds, and once it understands why the State had to recoup funds. For example, the recoupment methodology described above may be appropriate for poor statewide quality performance, but inappropriate for poor statewide APM adoption.

### 5.1.2 ACO, CP and CSA Accountability to the State

EXHIBIT 18 – Process Flow for ACO, CP and CSA Accountability to the State



Regardless of the State’s performance with respect to its accountability to CMS, the State will separately hold each ACO, CP and CSA that receives DSRIP funds individually accountable for its performance on a slate of quality and performance measures. This structure maximizes performance incentives for these recipients.

This individual accountability is applied to each ACO’s, CP’s and CSA’s at-risk DSRIP funding for each budget period. The State intends to withhold the at-risk portion of ACO’s, CP’s and CSA’s funding until the respective Accountability Scores are calculated. The ACOs, CPs and CSAs will then receive a percentage of their withheld funds based on their Accountability Score (e.g., if an entity scores 0.6, it will receive 60% of the at risk funds) and will not receive the remainder. The State will not require ACOs, CPs and CSAs to submit budgets for these earned at risk funds.

As described above, ACOs receive four sub-streams of DSRIP payment. The mechanism for accountability differs slightly by stream, as explained in the table below.



EXHIBIT 19 – ACO ACCOUNTABILITY MECHANISM BY FUNDING SUB-STREAM

ACO Accountability Mechanism by Funding Sub-Stream		
Provider Type	Funding Sub-Stream	Mechanism for Individual Accountability
ACOs	<b>Startup/Ongoing:</b> <i>Primary Care Investment</i>	Fixed amount, not withheld or at-risk
	<b>Startup/Ongoing:</b> <i>Discretionary</i>	Withheld portion is fully at-risk each BP based on ACO's Accountability Score
	<b>DSTI Glide Path</b>	Withheld portion is fully at-risk each BP based on ACO's Accountability Score
	<b>Flexible Services</b>	Not at performance risk. ACOs fully at risk for any expenses not approved by the State.

The portion of Startup/Ongoing funding that is provided for each ACO to support primary care investments are not at performance risk in order to provide some measure of predictability and stability in this funding stream, to encourage innovative investments in primary care infrastructure, and to mitigate the risk of costly delays or changes in funding that might make front-line primary care providers more hesitant to invest in practice-level change.

The at-risk withheld amount differs between the discretionary Startup/Ongoing stream, and the DSTI Glide Path. In general, a smaller percentage of the DSTI Glide Path funding is at risk. This difference reflects the safety net status of these hospitals.

EXHIBIT 20 – Percent of ACO Funding At Risk by Budget Period

Percent of ACO Funding At Risk by Budget Period						
DSRIP Budget Period	Prep BP	BP 1	BP 2	BP 3	BP 4	BP 5
Startup/Ongoing (Discretionary) At-Risk	0%	5%	15%	30%	40%	50%
Glide Path Funding At-Risk	0%	5%	5%	10%	15%	20%

For ACOs that join after BP1, their at-risk schedule will start at the BP1 percent (i.e. 5%), and then follow the schedule above with appropriate lag. For example, if an ACO joins in BP3, their at-risk schedule for the discretionary startup/ongoing funds would be: BP3 – 5%, BP4 – 15%, BP5 – 30%

CPs and CSAs also receive several funding streams, as described below. Funds for Infrastructure and Capacity Building are at risk for BH and LTSS CPs, and for CSAs. The amount of CP and CSA funds that are at-risk increases over the course of the program.

The accountability mechanisms for CPs and CSAs also vary by funding sub-streams, as described below. Funds for Infrastructure and Capacity Building are at risk for BH and LTSS CPs, and for CSAs.

EXHIBIT 21 – CP and CSA Accountability Mechanism by Funding Sub-Stream

CP and CSA Accountability Mechanism by Funding Sub-Stream		
Provider Type	Funding Sub-Stream	Mechanism for Individual Accountability
BH CPs	Care Coordination Supports	Funds are not at-risk
	Infrastructure & Capacity Building	Withheld portion is fully at-risk each BP based on CP's Accountability Score
	Outcome-Based Payments	Incentive pool based on performance on avoidable utilization measures
CSAs	Infrastructure & Capacity Building	At-risk portion of each BP based on CSA's Accountability Score
LTSS CPs	Care Coordination Supports	Funds are not at-risk
	Infrastructure & Capacity Building	Withheld portion is fully at-risk each BP based on CP's Accountability Score
	Outcome-Based Payments	Incentive pool based on performance on avoidable utilization measures

Exhibit 22 sets forth the anticipated amount of CP and CSA funding that is at risk by budget period.

EXHIBIT 22 – Amount of At-Risk CP and CSA Infrastructure and Capacity Building Funding by Budget Period

Percent of CP and CSA Infrastructure and Capacity Building Funding At-Risk by Budget Period						
DSRIP Budget Period	Prep BP	BP1	BP2	BP3	BP4	BP5
% of CP Infrastructure and Capacity Building Funding At-Risk	0%	0%	13%	42%	71%	100%
% of CSA Funding At-Risk	0%	0%	5%	10%	15%	20%

The State may update the at-risk percentages for CP infrastructure funding such that the total amount of at-risk CP funding is comparable to the original \$58.2M of at-risk CP funding, to the greatest extent possible based on the State's understanding of CP enrollment trends and other assumptions at the time of the update.

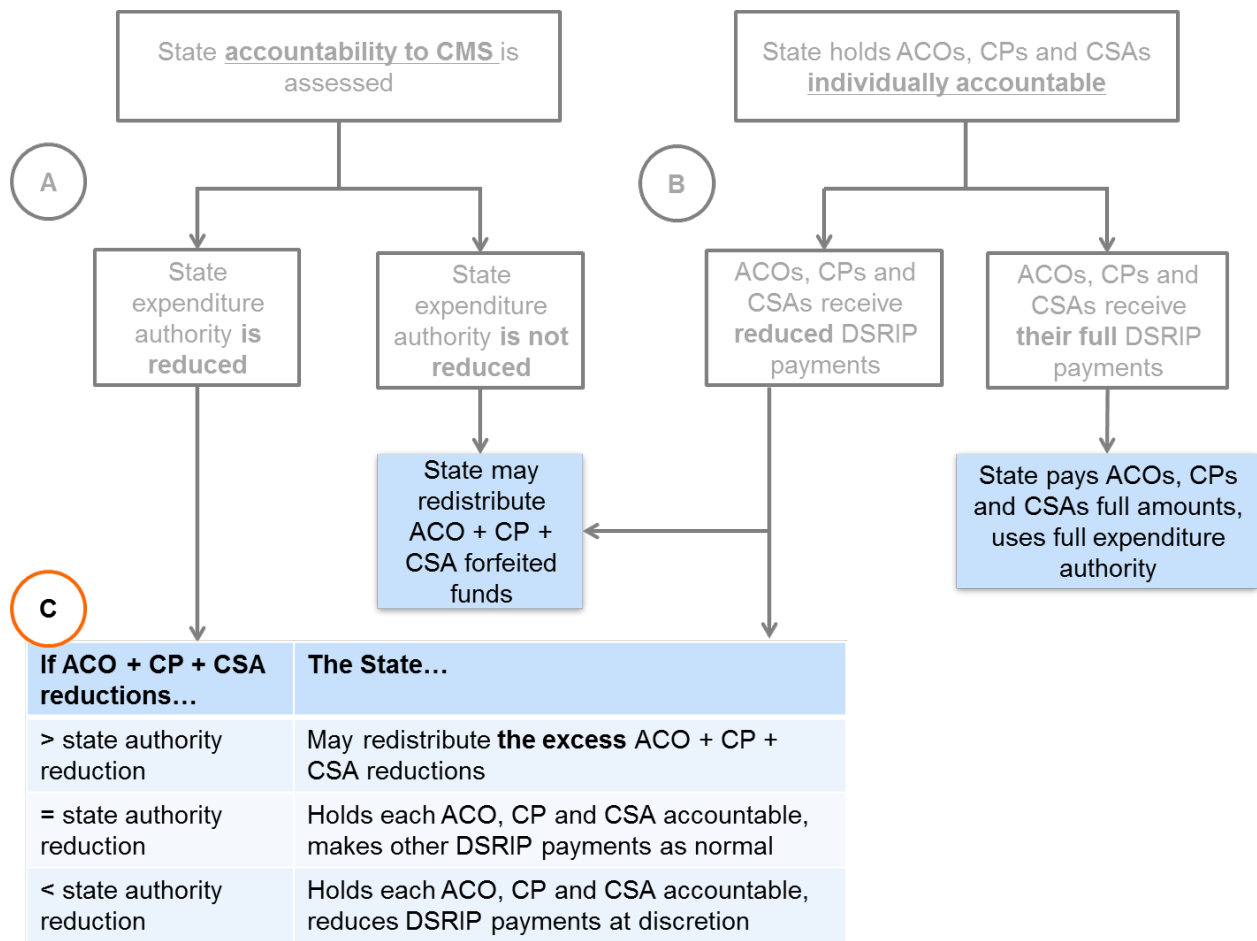
For CPs or CSAs that join after BP1, their at-risk schedule will start at the BP1 percent (i.e. 0%), and then follow the schedule above with appropriate lag. For example, if a CP joins in BP3, their at-risk schedule for the DSRIP funds would be: BP3 – 0%, BP4 – 71%, BP5 – 100%.

In addition to holding ACOs, CPs, and CSAs accountable by designating a portion of their DSRIP funding as at-risk, the State will manage its contracts with these entities to ensure compliance with and satisfactory

performance of contractual requirements related to the DSRIP program. In the event of noncompliance or unsatisfactory performance, the State will determine the appropriate recourse, which may include contract management activities such as, but not limited to: working collaboratively with the ACOs, CPs, or CSAs to identify and implement new strategies to meet their contractual requirements, requiring the ACOs, CPs, or CSAs to implement corrective action plans, or reducing DSRIP payments to the ACOs, CPs, or CSAs. If the State reduces DSRIP payments to ACOs, CPs, or CSAs as part of its contract management efforts, the undisbursed funds may be redistributed among the other DSRIP funding streams at the State's discretion, following the parameters described in Section 5.1.3.

### 5.1.3 Distribution of Funds Based on Accountability

EXHIBIT 23 – Process Flow for Distribution of Funds Based on Accountability



Based on the State's assessments of individual accountability for each ACO, CP and CSA, individual ACOs, CPs and CSAs may not receive a certain amount of DSRIP funds each Budget Period, relative to the maximum each could potentially receive.

If the State's expenditure authority is not reduced based on its accountability to CMS, the State has discretion to redistribute the DSRIP funds not distributed to ACOs, CPs, and CSAs (e.g., to determine how much each of the funding streams and sub-streams is increased) to best meet the State's programmatic needs, subject to any limits described elsewhere in this Protocol. For example, the State will identify the amount of forfeited DSRIP funds it has available to redistribute, and then determine how it might reallocate

the funds to other DSRIP funding streams. Any such redistributions would be reported with CMS in the State's quarterly progress reports.

For example, as early as the end of Q2 of BP4, the State anticipates that the BP2 Accountability Scores for the State, ACOs, CPs and CSAs will become available. If ACOs lost \$1M of at-risk BP2 funds and the State earned a 100% DSRIP Accountability Score, then the State could reallocate that \$1M to a different funding stream or sub-stream, at the State's discretion, based on the State's assessment of program needs, in the remaining time left in BP4 (e.g., increase flexible services allocation for ACOs, increase care coordination funding amounts or the outcomes-based incentive pool for CPs, increase statewide investments funding or implementation/oversight funding), or may be used for future BP4 or BP5 payments. The allowable categories that the redistributed funds could be reallocated to are:

- ACO funding stream
  - Startup/ongoing
  - Flexible services
- Community Partners funding stream
  - Infrastructure and capacity building
  - Care coordination
  - Outcomes-based payments
- Statewide Investments funding stream
  - All statewide investments

If the State's expenditure authority has been reduced based on its accountability to CMS, the State will base its actions on the relative sizes of these reductions, as follows:

- If the amount of funds not distributed to ACOs, CPs and CSAs pursuant to their accountability scores is equal to the State's expenditure authority reduction based on the State's accountability to CMS, the State will satisfy its obligation to reduce DSRIP spending by reducing payments to these ACOs, CPs and CSAs based on their individual accountability arrangements with the State, and will make other DSRIP payments pursuant to this Protocol
- If the amount of funds not distributed to ACOs, CPs and CSAs pursuant to their accountability scores exceeds the State's expenditure authority reduction based on the State's accountability to CMS, the State will satisfy its obligation to reduce DSRIP spending by reducing payments to these ACOs, CPs and CSAs based on their individual accountability arrangements with the State, but the State may have left over expenditure authority after doing so. The State has discretion to redistribute these excess DSRIP funds not distributed to ACOs, CPs, and CSAs pursuant to their accountability scores (e.g., to determine how much each of the funding streams and sub-streams is increased) to best meet the State's programmatic needs, subject to any limits described elsewhere in this Protocol. Such redistribution of funds would follow the same processes described above for when the State's expenditure authority has not been reduced.
- If the amount of funds not distributed to ACOs, CPs and CSAs is less than the State's expenditure authority reduction based on the State's accountability to CMS (including if ACOs, CPs and CSAs receive all DSRIP funds under their accountability arrangements with the State), the State has discretion to determine whether and to what extent each of the four funding streams and sub-streams is reduced for an upcoming Budget Period to best meet the State's programmatic needs, subject to any limits described elsewhere in this Protocol. The State also has discretion to determine whether and to what extent to satisfy the reduced expenditure authority through retroactive recoupments from recipients of DSRIP payments or through separately paying CMS back for the Federal Financial Participation for any such reduced expenditure authority.
  - State DSRIP expenditures can be categorized as (1) non-at-risk payments and (2) at-risk payments which are dependent on the calculation of Accountability Scores. The State will

make non-at-risk payments and then retroactively claim FFP for those payments. Given that the FFP claiming for the non-at-risk payments for a particular Budget Period may occur before the State's Accountability Score is calculated for that Budget Period, it is possible for the State to claim more FFP than its reduced expenditure authority would allow. In this scenario, the State would reconcile its claimed FFP amount with CMS. If the State retroactively recoups funds from ACOs, CPs, or CSAs, it will follow the process laid out in Section 5.1.1.

## 5.2 State Accountability to CMS

As set forth in STC 71, a portion of the State's DSRIP expenditure authority will be at-risk. In accordance with STC 71, if the State's DSRIP expenditure authority is reduced based on an Accountability Score that is less than 100%, then the State will reduce future DSRIP payments in proportion to the reduced expenditure authority to ensure sufficient state funding to support the program. The portion of at-risk DSRIP expenditure authority is set forth in Exhibit 24. The amount of DSRIP Expenditure Authority expressed in row 1 of Exhibit 24 (and the corresponding table in STC 71(b)) is divided into Budget Periods solely for the purpose of calculating the amount of Actual Expenditure Authority At-Risk as indicated in row 3 of Exhibit 24.

EXHIBIT 24 – Percent of DSRIP Expenditure Authority At-Risk

DSRIP Budget Period	Prep BP and BP1	BP 2	BP 3	BP 4	BP 5
DSRIP Expenditure Authority	\$637.5M	\$412.5M	\$362.5M	\$275M	\$112.5M
% of Expenditure Authority At-Risk	0%	5%	0%	15%	20%
Actual Expenditure Authority At-Risk	\$0M	\$20.625M	\$0M	\$41.25M	\$22.5M

The amount of at-risk DSRIP expenditure authority lost will be determined by multiplying the State's DSRIP Accountability Score for a given BP by the amount of Actual Expenditure Authority At-Risk as indicated in row 3 of Exhibit 24. The Actual Expenditure Authority At-Risk as indicated in row 3 of Exhibit 24 will not vary based on carry forward or forfeited funds. The methodology for calculating the State's DSRIP Accountability Score is discussed in Section 5.2.1.

### 5.2.1 Calculating the State DSRIP Accountability Score

The State DSRIP Accountability Score will be based on three domains: (1) MassHealth ACO/APM Adoption Rate; (2) Reduction in State Spending Growth; and (3) ACO Quality and Utilization Performance.

Each domain will be assigned a weight that varies by Budget Period. The weights for the State DSRIP Accountability domains are detailed in Exhibit 25:

EXHIBIT 25 – State DSRIP Accountability Domains

State DSRIP Accountability Domain	Prep Budget	% Contribution to State DSRIP Accountability Score			
		BP 1	BP 2	BP 3	BP 4-5
MassHealth ACO/APM Adoption Rate	NA	NA	30%	NA	20%
Reduction in State Spending Growth	NA	NA	NA	NA	25%
ACO Quality Performance	NA	NA	70%	NA	55%

The State will calculate the State DSRIP Accountability Score by multiplying the Score for each State DSRIP Accountability domain by the associated weight and then summing the totals together.

For example, the BP 5 State DSRIP Accountability Score is calculated using the following equation:

State DSRIP Accountability Score = (MassHealth ACO/APM Adoption Rate Score) \* 20% + (Reduction in State Spending Growth Score) \* 25% + (ACO Quality Performance Score) \* 55%

If the State is able to earn 100% for the MassHealth/APM Adoption Rate Score, 30% for the Reduction in State Spending Growth Score, and 70% for the ACO Quality Performance Score, then the State's DSRIP Accountability Score would be:

State DSRIP Accountability Score = (100%) \* 20% + (30%) \* 25% + (70%) \* 55% = 66%

The State estimates that it will take approximately 18 months after the close of a Budget Period to calculate the State DSRIP Accountability Score, due to claims rollout and other administrative considerations. Thus, the State anticipates that it will provide its DSRIP Accountability Score and supporting documentation for a given Budget Period 7-8 quarters after the Budget Period ends. If the State DSRIP Accountability Score is not 100%, pursuant to STC 71(d), the State may submit to CMS a proposed Corrective Action Plan at the same time as it submits its State DSRIP Accountability Score and supporting documentation.

#### **Corrective Action Plan**

The Corrective Action Plan will include steps the State may take to regain any reduction to its DSRIP expenditure authority; and potential modification of accountability targets. The State's Corrective Action Plan will be subject to CMS approval. CMS will render a decision on approval or disapproval of requested Corrective Action Plan within 60 business days of receipt of Plan and prior to determining the amount of reduction to the State's DSRIP expenditure authority. If CMS does not approve the Corrective Action Plan, then the State's DSRIP expenditure authority will be reduced in accordance with the State DSRIP Accountability Score. If CMS approves the Corrective Action Plan, the State's DSRIP expenditure authority for the relevant Budget Period will be held intact and not reduced, contingent on the State successfully implementing the approved Corrective Action Plan. If the State fails to implement the Corrective Action Plan, then CMS will retrospectively reduce the State's DSRIP expenditure authority in accordance with the State's DSRIP Accountability Score. If the State partially implements the Corrective Action Plan, then CMS has the discretion to require a smaller retrospective reduction in the State's DSRIP expenditure authority. If the State chooses not to submit a Corrective Action Plan for a certain Budget Period, then the State's DSRIP expenditure authority for that Budget Period will be reduced in accordance with the State DSRIP Accountability Score.

#### ***5.2.1.1 State Accountability Domain 1: Calculating the MassHealth ACO/APM Adoption Rate***

Under the MassHealth ACO/APM Adoption Rate accountability domain, the State will have target percentages for the number of MassHealth ACO-eligible members who are enrolled in or attributed to ACOs or who receive service from providers paid under APMs. The State will calculate the percentage of ACO-eligible members enrolled in or attributed to ACOs or who receive services from providers paid under APMs, as follows:

- ACO-eligible members shall be all members who are eligible to enroll in or be attributed to MassHealth ACOs
- The State shall count towards the State's achievement of ACO/APM adoption, all members who:
  - Are enrolled in or attributed to an ACO during the Budget Period

- Are enrolled with a MassHealth MCO and receive primary care from a PCP that is paid by that MCO under a shared savings and/or shared risk arrangement, or is similarly held financially accountable by that MCO for the cost and quality of care under a State-approved APM contract
- Receive more than 20% of their non-primary care services (either gross patient service revenue or net patient service revenue) from providers who are paid under episode-based payments, shared savings and/or shared risk arrangements, or who are similarly held financially accountable for the cost and quality of care under a State-approved APM contract

The target adoption percentages will follow the schedule detailed in Exhibit 26.

EXHIBIT 26 – Target ACO/APM Adoption Rates

DSRIP Budget Period	Prep Budget	BP 1	BP 2	BP 3	BP 4	BP 5
ACO/APM adoption (as defined above)	NA	25%	30%	35%	40%	45%

If the State meets or surpasses the target for a given Budget Period, the State will earn a 100% score on this domain for that Budget Period. If the State does not meet the target, then it will earn a 0% score for that Budget Period.

**5.2.1.2 State Accountability Domain 2: Reduction in State Spending Growth**

In accordance with STC 71(f), the State will calculate its performance on reduction in state spending growth compared to the trended PMPM, as detailed in Exhibit 27 and the domain score will be determined according to a gap-to-goal methodology for each Budget Period, as detailed in STC 71(g). The PMPM used will be as follows:

4.4% - 2017 President’s Budget Medicaid Baseline smoothed per capita cost trend, all populations combined, 2017-2022

The State will be accountable to a 2.1% reduction in PMPMs for the ACO-enrolled population, off of “trended PMPMs” (described below) by BP 5. In Budget Periods 3 and 4, the State will have target reductions smaller than 2.1% off of the trended PMPM, as preliminarily detailed in Exhibit 27.

EXHIBIT 27 – Proposed Reduction Targets for ACO-Enrolled PMPMs

DSRIP Budget Period	Prep Budget	BP 1	BP 2	BP 3	BP 4	BP 5
% Reduction Target in ACO-enrolled PMPM vs. trended PMPM	NA	NA	NA	0.25% off of trended PMPM	1.1% off of trended PMPM	2.1% off of trended PMPM

The State and CMS will revisit the reduction targets for BP4 and BP5 by July 2021 in order to fully account for the impact of the state of emergency declared by the federal or state government.

*Gap to Goal Methodology*

In accordance with STC 71(f), the State will calculate its performance on reduction in State spending growth compared to the trended PMPM, and the domain score will be determined according to a gap-to-goal methodology for each Budget Period, as detailed in STC 71(g).

The State anticipates measuring spending performance against the PMPM spending reduction target up to 22 months after the close of each Calendar Year (CY) as follows. Baseline spending trends will be determined as early as Q4 of CY2020, according to the following methodology:

- Baseline PMPM spending in CY2017 will be calculated by dividing actual expenditures for dates of service in CY2017 in Included Spending Categories (as defined below), by the number of member months for all MCO and PCC -enrolled members (i.e., ACO-eligible population) for each Rating Category (RC).
  - RC 1 – Child: Enrollees who are non-disabled, under the age of 21, and in the MassHealth Standard or the Family Assistance coverage types as described in 130 CMR 505
  - RC 1 – Adult: Enrollees who are non-disabled, age 21 to 64, and in the MassHealth Standard or the Family Assistance coverage types as described in 130 CMR 505
  - RC 2 – Child: Enrollees who are disabled, under the age of 21, and in MassHealth Standard or CommonHealth as described in 130 CMR 505
  - RC 2 – Adult: Enrollees who are disabled, age 21 to 64, and in MassHealth Standard or CommonHealth as described in 130 CMR 505
  - RC 9: Individuals ages 21 through 64 with incomes up to 133% of the federal poverty level (FPL), who are not pregnant, disabled, a parent or caretaker relative of a child under age 19, or eligible for other EOHHS coverage
  - RC 10: Individuals ages 21 through 64 with incomes up to 133% of the FPL, who are not pregnant, disabled, a parent or caretaker relative of a child under age 19, or eligible for other EOHHS coverage, who are receiving Emergency Aid to the Elderly, Disabled, and Children (EAEDC) through the Massachusetts Department of Transitional Assistance
  - Note: The medically frail population will be in RC 9 for the purposes of this Baseline PMPM calculation.
- A weighted-average Baseline PMPM will then be calculated by multiplying the PMPM rate for each RC by the proportion of ACO-eligible population member months represented within each RC to derive the Baseline PMPM.

$$Baseline\ PMPM^{CY2017} = \sum_n Actual\ PMPM_{RC\ n}^{CY2017} \times ACO\ elig\ pop\ RC\ proportion_{RC\ n}^{CY2017}$$

- Trended PMPMs for each RC will be calculated by applying a 4.4% annual growth rate to the CY2017 Actual Baseline PMPMs for each RC and year from CY2018 through CY2022, summarized as follows:

$$Trended\ PMPM_{RC\ n}^{YEAR\ t} = 1.044^t \times Actual\ Baseline\ PMPM_{RC\ n}$$

- For each measurement period, a weighted average Trended PMPM (the “Avg Trended PMPM”) will then be calculated by multiplying the Trended PMPM for each RC by the proportion of total CY2017 ACO-eligible member months represented within each RC, summarized as follows:

$$Avg\ Trended\ PMPM^{YEAR\ t} = \sum_n Trended\ PMPM_{RC\ n}^{YEAR\ t} \times ACO\ Elig\ RC\ proportion_{RC\ n}^{CY2017}$$



- If during the measurement period there are changes to Included Spending Categories or other material program changes not captured in the annual growth rate, the CY2017 Baseline and Trended PMPMs may be recalculated to reflect these changes, subject to CMS approval.
  - In particular, if the State identifies a material difference between the CY2017 ACO eligible population and the population of members and provider networks that participate in the ACO program during the performance years (e.g., if ACOs that have historically high costs for their member populations join the program), the State may request that CMS adjust the CY2017 baseline to account for such difference; the State shall provide supporting analysis in the event of such a request, and CMS will have 90 calendar days to review and approve the request.

For each Calendar Year, performance of the ACO population will be measured as follows:

- The medically frail population will be in RC 9 for all calendar years for the purposes of the following calculations.
- The State will divide actual expenditures in Included Spending Categories by eligible member months during the CY to generate raw PMPM spending for the ACO population within each RC. Actual expenditures will be based on date of service, and will be derived from Medicaid claims data, MCO encounter data, and/or accounting reports, summarized as follows:

$$ACO\ Pop\ Raw\ PMPM_{RC\ n}^{YEAR\ t} = ACO\ Pop\ Actual\ Expenditures_{RC\ n}^{YEAR\ t} \div ACO\ pop\ MM_{RC\ n}^{YEAR\ t}$$

- To adjust for differences in acuity, an average risk score for the ACO enrolled population in each measurement period as well as an average risk score for the CY17 ACO eligible population will be calculated using the DxCG risk model employed for ACO pricing.
- Raw PMPMs for the ACO population will be divided by risk scores to calculate risk-adjusted PMPMs, summarized as follows:

$$Adj\ PMPM_{RC\ n}^{YEAR\ t} = \frac{Raw\ PMPM_{RC\ n}^{YEAR\ t}}{ACO\ Pop\ Risk\ Score_{RC\ n}^{YEAR\ t} / ACO\ Elig\ Risk\ Score_{RC\ n}^{CY2017}}$$

- A weighted average risk-adjusted PMPM for the ACO population will be calculated by aggregating the products of the risk-adjusted PMPMs for each RC multiplied by the proportion of total CY2017 ACO-eligible population member months represented within each RC, summarized as follows:

$$Avg\ Adj\ PMPM^{Year\ t} = \sum_n Adj\ PMPM_{RC\ n}^{YEAR\ t} \times ACO\ Elig\ pop\ RC\ proportion_{RC\ n}^{CY2017}$$

- Savings attributed to the “DSTI Glide Path” sub-stream payments will be subtracted from the weighted average risk-adjusted PMPM on an aggregate basis each CY.
  - DSTI Glide Path payments made during the CY will be subtracted from the DSTI payments made during CY2017 and divided by the total member months included in measurement year’s weighted average risk-adjusted PMPM. The resulting savings PMPM will be subtracted from the weighted average risk-adjusted PMPM to derive total PMPM spending for the ACO population (“Actual PMPM”), summarized as follows:

$$\begin{aligned}
 \text{Actual PMPM}^{\text{YEAR } t} & \\
 &= \text{Avg Adj PMPM}^{\text{YEAR } t} \\
 &= \frac{\text{DSTI payments}^{\text{CY2017}} - \text{DSTI Glide Path payments}^{\text{YEAR } t}}{\text{ACO pop member months}}
 \end{aligned}$$

- The percent reduction in Actual PMPM will be determined according to the following calculation: percent reduction = (Avg Trended PMPM minus Actual PMPM) / (Avg Trended PMPM), summarized as follows:

$$\text{Percent reduction}^{\text{YEAR } t} = \frac{\text{Avg Trended PMPM}^{\text{YEAR } t} - \text{Actual PMPM}^{\text{YEAR } t}}{\text{Avg Trended PMPM}^{\text{YEAR } t}}$$

### *Included Spending Categories*

Determination of spending baseline and actual performance of the ACO population will take into consideration all expenses included in ACOs' capitation rates and TCOC Benchmark calculations for year 1 of the ACO program. For the population of members attributed to MCO-Administered ACOs, the determination of spending will be based on actual MCO expenditures for services to the population attributed to the ACO, and not on the State's capitated payments to the MCO. These costs include costs for covered services such as physical health, behavioral health, most pharmacy, and supplemental maternity payments, but do not include costs for Long Term Services and Supports (LTSS) and certain other costs that are similarly excluded from ACO capitation rates and TCOC Benchmarks. In addition, the following expenditure categories shall be excluded from both baseline and actual performance measurement for the purposes of the state's TCOC accountability to CMS, regardless of their inclusion in or exclusion from ACO TCOC:

- Hepatitis C drugs
- Other high-cost emerging drug therapies (e.g., treatment for cystic fibrosis) that result in a significant increase in spending that is not reasonably in the control of an ACO to manage
- Children's Behavioral Health Initiative
- Applied Behavioral Analysis
- Substance Use Disorder Services listed in STC 41, Table D
- Non-covered services
- All DSRIP expenditures except those for the DSTI Glide Path sub-stream as described above
- Payments made in accordance with Attachment Q of the 1115 Waiver Demonstration and other quality incentive payments
- All administrative payments made to ACOs, or to MCOs for MCO-Administered ACO members

The State may submit requests for additional exclusions or Baseline PMPM adjustments for CMS approval by submitting an amendment to the Protocol. CMS will have 60 business days to review and respond to these methodology modification requests.

### *PMPM Spending Reporting Tool*

The State and CMS will jointly develop a reporting tool (using a mutually agreeable spreadsheet program) for the State to use for annual PMPM spending demonstration and in other situations when an analysis of ACO-enrolled population PMPM spending is required. A working version of the reporting tool will be available for the State’s report for the fourth quarter of the third Budget Period.

### 5.2.1.3 State Accountability Domain 3: Overall Statewide Quality Performance

In accordance with STC 71, the State will annually calculate the State performance score for each quality domain by aggregating the performance scores across all ACOs in an unweighted fashion. The anticipated weighting of each domain to the Overall Statewide Quality Performance is detailed in Exhibit 28. The overall DSRIP quality domain score will be determined by calculating a weighted sum of the DSRIP domain scores, according to the domain weights detailed in Exhibit 28. Please see Appendix D for example calculations.

EXHIBIT 28 – Anticipated Weighting of State Quality Domains

Domain	BP1	BP2	BP3	BP4-5
<i>Clinical Quality Measures</i>				
Prevention & Wellness	N/A	85%	N/A	45%
Care Integration		N/A	N/A	40%
<i>Patient Experience Surveys</i>				
Overall Rating and Care Delivery	N/A	15%	N/A	7.5%
Person-centered Integrated Care	N/A	N/A	N/A	7.5%

*N/A – indicates no quality measures are in Pay-for-Performance (P4P) and do not factor into the State Accountability scoring.*

The measures within the domains are the same measures for the State as for the ACOs (i.e., Appendix D). For an ACO, measures within a given domain all contribute to that ACO's domain score equally (unless otherwise indicated in Appendix D). For the State Accountability Domain Scores, ACO domain scores are aggregated across all ACOs, where each ACO domain score contributes to its associated State Accountability Domain Score equally.

#### *Scoring for All Domains*

The State will calculate two scores:

- **Aggregate domain score** – the domain score calculated by aggregating scores from all ACOs
- **DSRIP domain score** – the domain score used in the calculation of the State DSRIP Accountability Score; dependent on how aggregate domain scores in a given year compare to pooled scores in all previous DSRIP Budget Periods

For the purposes of calculating the aggregate domain scores for State Accountability, the State will include only Achievement points from the ACOs (as outlined in Section 5.3.1). Pay-for-Reporting (P4R) points obtained in BP1 or Improvement Points obtained in BP 2-5 (as outlined in Section 5.3.1) are not included in the State Accountability calculations.

The aggregate domain score is determined by calculating the median value across all ACOs for the particular domain in question. To allow for consistent comparisons, only ACO achievement points are used in the calculation. For example, if the State has three ACOs (ACO<sub>1</sub>, ACO<sub>2</sub>, ACO<sub>3</sub>), and those ACOs achieve domain scores of 30%, 50% and 70% for the Prevention & Wellness (P&W) domain, respectively, then the

aggregate domain score for the P&W domain would be 50%, as this value is the median (i.e., middle) value from this distribution.

After calculating the aggregate domain scores for the current BP and a particular domain, the State will calculate the DSRIP domain score for that particular domain. The State will use a two-tailed, un-matched, Wilcoxon rank-sum test (hereinafter “Wilcoxon test”) to calculate whether the aggregate domain score in the current BP is statistically better, not statistically different, or statistically worse, as compared to the pooled aggregate domain score from previous BPs. The State will use a p-value of 0.05 to establish statistical significance.

- If the aggregate domain score in the current BP is better and statistically significant ( $p < 0.05$  using a Wilcoxon test) or not statistically different ( $p \geq 0.05$  using a Wilcoxon test) than the pooled aggregate domain score from prior BPs; the State receives a 100% DSRIP domain score for the domain.
- If the aggregate domain score in the current Budget Period is worse, and statistically significant ( $p < 0.05$ , using a Wilcoxon test) than the pooled aggregate domain score from prior BPs; the State receives a 0% DSRIP domain score for the domain.

Using the Prevention & Wellness (P&W) domain in BP2 as an example:

- The P&W pooled aggregate domain score from BP1 is calculated using only the Achievement Points (as outlined in Section 5.3.1.2). Pay-for-Reporting (P4R) Points earned by ACOs in BP1 for the purposes of calculating ACO Accountability are not included.
- If the P&W aggregate domain score in BP2 is not statistically worse (i.e., comparable or statistically better) than the P&W aggregate domain score in BP1, then the BP2 P&W DSRIP domain score is 100%.
- If the P&W aggregate domain score in BP2 is statistically worse than the P&W aggregate domain score in BP1, then the BP2 P&W DSRIP domain score is 0%

Using the Prevention & Wellness (P&W) domain in BP4 as an example:

- The P&W aggregate domain score for BP1 is calculated using only the Achievement Points (as outlined in Section 5.3.1.2). Pay-for-Reporting (P4R) Points earned by ACOs in BP1 for the purposes of calculating ACO Accountability are not included. The P&W aggregate domain score for BP2 is calculated using the Achievement Points (as outlined in Section 5.3.1.2). Improvement points potentially earned by ACOs in BP2 for the purposes of calculating ACO Accountability are not included. Therefore, the pooled aggregate domain score from BP1 through BP2 is based only on the Achievement Points earned during those BPs.
- If the P&W aggregate domain score in BP3 is not statistically worse (i.e., comparable or statistically better) than the pooled P&W aggregate domain scores from BP1 through BP2, then the BP3 P&W DSRIP domain score is 100%
- If the P&W aggregate domain score in BP3 is statistically worse than the pooled P&W aggregate domain scores from BP1 through BP2, then the BP3 P&W DSRIP domain score is 0%

See Appendix C for a more detailed example of how to calculate the State’s Quality Domain score.

### **5.2.2 DSRIP Expenditure Authority and Claiming FFP**

The State must use a permissible source of non-federal share to support the DSRIP program. The non-federal share of DSRIP payments consists of revenues deposited in the State's MassHealth Delivery System Reform Trust Fund administered by the Executive Office of Health and Human Services. Sources of funds in the Delivery System Reform Trust Fund are deposited at the direction of the Legislature and include hospital assessments transferred from the Health Safety Net Trust Fund, General Fund dollars, and interest earned. The non-federal share will be used to support claiming of Federal Financial Participation (FFP), up to the State's DSRIP expenditure authority. The amount of DSRIP expenditure authority is dependent on the State DSRIP Accountability Score, which is described above in Section 5.2.1, which describes:

- How the State DSRIP Accountability Score is calculated
- The review and approval process for the State DSRIP Accountability Score, including how the State may submit a Corrective Action Plan to CMS if the State's DSRIP Accountability Score is not 100% for a given Budget Period
- If the State chooses not to submit a Corrective Action Plan for a certain Budget Period, then the State's DSRIP expenditure authority for that Budget Period will be reduced in accordance with the State DSRIP Accountability Score.

Federal Financial Participation is only available for DSRIP payments to ACOs and CPs in accordance with the DSRIP Protocol and Participation Plans; or to other entities that receive funding through the DSRIP statewide investments or DSRIP-supported state operations and implementation funding streams. The State may claim FFP for up to two years after the calendar quarter in which the State made DSRIP payments to eligible entities.

The State may claim FFP for up to \$1.8 billion in DSRIP expenditures, subject to all requirements set forth in the demonstration Expenditure Authority, Special Terms and Conditions, and this DSRIP protocol. A portion of DSRIP payments to ACOs, CPs and CSAs are at-risk (Exhibits 16 and 17), and the State will withhold these at-risk payments from the entities until their DSRIP Accountability Scores or elements of the DSRIP Accountability Scores are calculated by the State. If only some of the elements comprising the DSRIP Accountability Scores have been calculated, the State will pay out only the withheld earned at-risk funds tied to those elements. The draw of the FFP match for all at-risk funds, or reporting of payments on the CMS-64 form, will not occur until DSRIP Accountability Scores (see Sections 5.3 and 5.4.1), elements comprising DSRIP Accountability Scores, or DSRIP Performance Remediation Plan Scores (see Sections 5.3.4.2 and 5.4.6.1) have been calculated by the State. As described in Sections 5.3.4.2 and 5.4.6.1, the State will calculate each element of the DSRIP Accountability Scores and disburse the portion of the earned at-risk funds tied to each element, as appropriate. The State will report such expenditures on the CMS 64 form and draw down FFP accordingly.

### **5.2.3 Modification to State Accountability Targets**

The State may modify State Accountability Targets during the demonstration period (e.g., in situations where an expensive, but highly needed prescription drug enters the market). The State will submit modification requests to CMS for review and approval. CMS will review and approve the proposed modifications within 90 calendar days of submission.

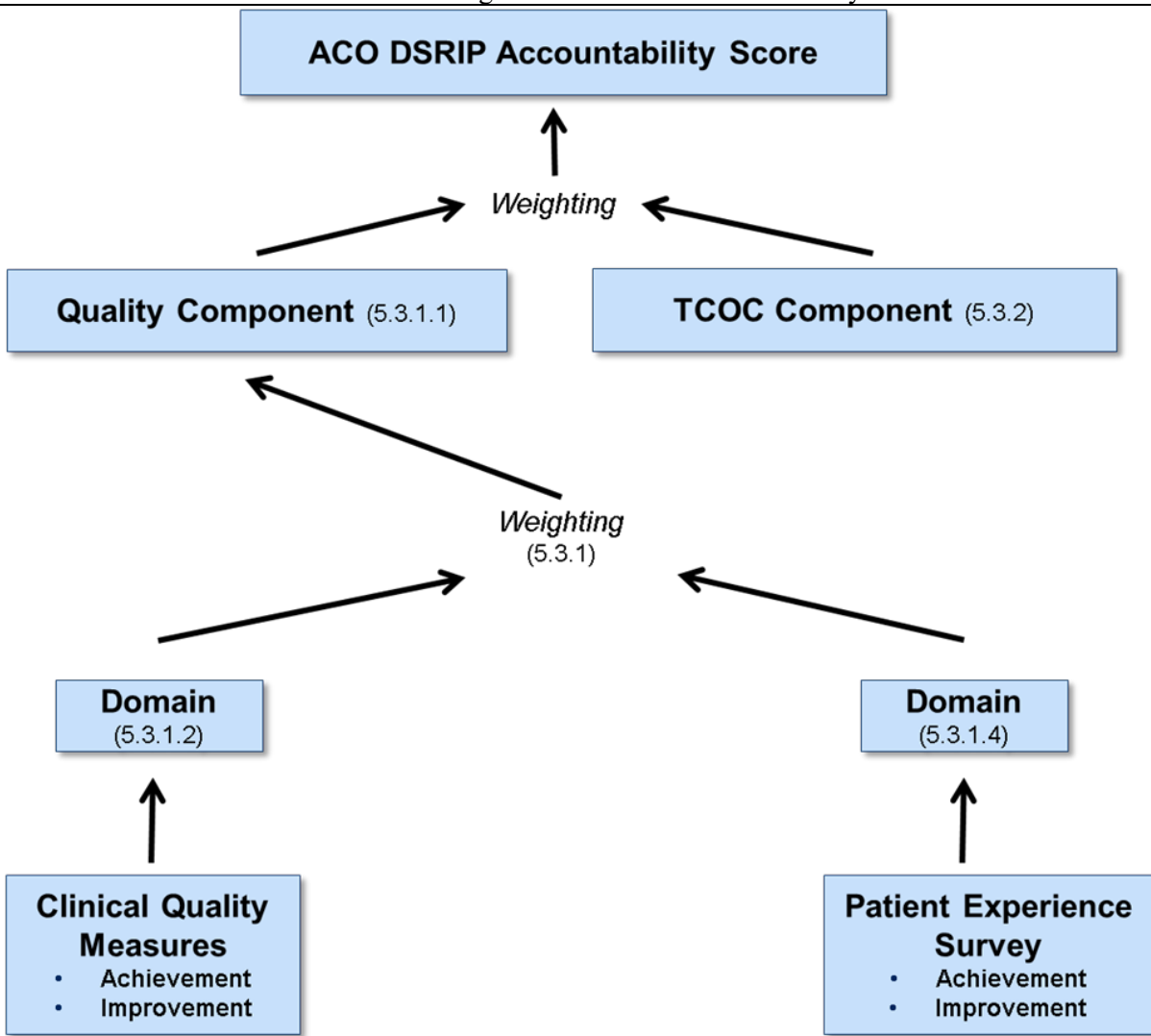
## **5.3 Accountability Framework & Performance Based Payments for ACOs**

As described in Section 4.4 above, each of the four sub-streams of DSRIP funding that the State will pay to ACOs is subject to an accountability framework that aligns ACO incentives with the State's delivery system reform goals. For two of these sub-streams (Startup/Ongoing: discretionary; and DSTI Glide Path), the State will hold each ACO accountable for the ACO's individual performance by withholding a

percentage of the funds each Budget Period, and retrospectively paying out a portion of the withheld amounts to the ACO based on the ACO's performance on clinical quality and member experience measures as well as on Total Cost of Care.

The State will measure ACO performance using a state-calculated score called the "ACO DSRIP Accountability Score." The ACO DSRIP Accountability Score is a value between zero (0) and one (1), expressed as a percentage (i.e., between 0% and 100%). The State will multiply each ACO's withheld funds for a given Budget Period by the ACO's ACO DSRIP Accountability Score for that Budget Period, and will retrospectively pay the ACO the resulting amount. Sections 4.4.1-4.4.3 focus on the technical methodology for calculating these scores. Section 4.4 describes process, timelines, key players and roles and responsibilities for calculating the scores.

- **Section 5.3.1: Quality and TCOC Components of the ACO DSRIP Accountability Score**
- **Section 5.3.2: TCOC Component of the ACO DSRIP Accountability Score**
- **Section 5.3.3: Impact of DSRIP Accountability Scores on Payments to ACOs**
- **Section 5.3.4: Process, Roles, and Responsibilities for calculating the ACO DSRIP Accountability Score**
- **Section 5.3.5: Timeline of ACO DSRIP Accountability Score data collection, calculation, and disbursement of DSRIP payments**



### 5.3.1 Quality and TCOC Components of the ACO DSRIP Accountability Score

Each ACO’s ACO DSRIP Accountability Score is produced by blending two separate measures of the ACO’s performance during the Budget Period: (1) the Quality component of the ACO DSRIP Accountability Score; and (2) TCOC component of the ACO DSRIP Accountability Score. The Quality component of the ACO DSRIP Accountability Score is a score that the State will calculate that represents the ACO’s performance on quality measures during the Budget Period. The TCOC component of the ACO DSRIP Accountability Score is a score that the State will calculate that represents the ACO’s performance on TCOC management during the Budget Period. Each of these two scores is a value between zero (0) and one (1) expressed as a percentage (i.e., 0% to 100%).

For each ACO, the State will blend these two scores each Budget Period using a weighted average (i.e., the Quality component of the ACO DSRIP Accountability Score will be multiplied by a weight; the TCOC component of the ACO DSRIP Accountability Score will be multiplied by a weight; and the two resulting products will be summed to produce the ACO’s ACO DSRIP Accountability Score). Exhibit 30 below shows the anticipated weights for each Budget Period.

**EXHIBIT 30 – ACO DSRIP Accountability Domains**

ACO DSRIP Accountability Domain Weights			
	Prep BP	BP 1-2	BP 3-5
Quality component of the ACO DSRIP Accountability Score	N/A	100%	75%
TCOC component of the ACO DSRIP Accountability Score	N/A	N/A	25%

ACOs do not have ACO DSRIP Accountability Scores during the Preparation Budget Period because no funds are withheld. ACOs will not have enrolled or attributed members during this period, and the State will therefore not be able to calculate performance on quality measures and TCOC metrics. During Budget Periods 1 and 2, the State will not hold ACOs accountable for TCOC performance in the ACO DSRIP Accountability Score, to allow ACOs time to analyze baseline TCOC performance, which will not be finalized for Budget Period 1 until close to the end of Budget Period 2.

**5.3.1.1 Calculating the Quality Component of the ACO DSRIP Accountability Score by Combining Domain Scores**

The State will calculate each ACO’s Quality Component of the ACO DSRIP Accountability Score based on the ACO’s performance on a range of State-defined quality measures. The quality measure slate was chosen to support the goals of the DSRIP program including promoting member-driven, integrated, coordinated care and improving integration among physical health, behavioral health, long-term services and supports, and health-related social services. In addition, the ACO measure slate has significant overlap with the CP measure slate, helping to align ACO quality evaluation with CPs and furthering integration.

These measures are organized across four (4) Quality Domains. The State will calculate a Domain Score for each of these four (4) Quality Domains; each Domain Score will be a value between zero (0) and one (1) expressed as a percentage (i.e., 0% to 100%). The State will combine these four (4) Domain Scores using a weighted average (i.e., the State will multiply each Domain Score by a Domain Weight and will sum the weighted products to produce the ACO’s Quality Score for the Budget Period). The four (4) Quality Domains and their anticipated weights are listed below in Exhibit 31.

If an ACO does not meet eligibility requirements for a specific measure, then the weight assigned to the measure within the measure’s domain will be redistributed equally among all other measures within that domain. Thus, the overall domain weights will not increase or decrease as a result of measure ineligibility. If an ACO is ineligible to provide data on all measures within a given domain, the redistribution of that domain weight to other eligible domains will be reviewed by the DSRIP Quality Committee and the State, and will be submitted to CMS for review and approval within 90 calendar days prior to final DSRIP Accountability scoring.

If an ACO receives approval from the State to down-weight one or more measures in a domain, then the excess weight assigned to the measure or those measures within the measure’s domain will be redistributed equally among all other measures within that domain. Such a redistribution of measure weights will not impact the overall domain weights. For example, if a domain has 10 measures, each measure begins as being weighted at 10% of the domain score. If four of the measures are down-weighted such that they only contribute 2.5% each to the domain score, then the excess 30% is redistributed to the other six measures, such that they would be weighted at 15% of the domain score.

**EXHIBIT 31 – ACO Quality Domains and Domain Weights**



ACO Quality Domain Weights					
Quality Domain		Domain Weight: BP 1	Domain Weight: BP 2	Domain Weight: BP3	Domain Weight: BP 4-5
<i>Clinical Quality Measures</i>					
1	Prevention & Wellness	100% (P4R only)	85%	65%	45%
2	Care Integration		--	20%	40%
<i>Patient Experience Surveys</i>					
3	Overall Rating and Care Delivery	--	15%	15%	7.5%
4	Person-centered Integrated Care	--	--	--	7.5%

Appendix D displays the Clinical Quality Measures, including an indication as to whether the measure data will be collected via claims and encounter data only (“Admin”) or whether chart or record review data (“Hybrid”) will be utilized. Additionally, there is an indication of the expected “Pay-for-Reporting (P4R)”, “Reporting” and/or “Pay-for-Performance (P4P)” role in the program by Budget Period. Appendix D includes further details regarding the measures including measure descriptions. The State will send the initial measure specifications to CMS for review and approval by July 2017.

For Quality Measures that are primarily based on national measure specifications (e.g., NCQA HEDIS), where minimal changes have been made to the specification (e.g., a change from health plan population to ACO population), the State will use nationally available Medicaid benchmarks to establish its Attainment Thresholds and Goal Benchmarks where feasible (see Section 5.3.1.2). The State will propose these Attainment Thresholds and Goal Benchmarks to CMS by August 2017.

For Quality Measures for which there are related (i.e., same measure description) national measure specifications (e.g., ADA, AMA, CMS) but where changes may be significant (e.g., a change in risk adjustment methodology or a change from all-payer population to Medicaid-only population), the State will research existing data to determine if the related national and/or state/local data is applicable. If the existing data are relevant, the State will propose Attainment Thresholds and Goal Benchmarks for these measures to CMS by August 2017. If the existing data are not relevant, the State will propose Attainment Thresholds and Goal Benchmarks for these measures to CMS by November 2018 using CY2017 data (for claims-based measures) or November 2019 using CY2018 (for measures requiring chart review).

For novel measures, including member experience, the State will attempt to identify similar measures with similar specifications from other data sources (e.g., other DSRIP programs, statewide data, etc.) as a source for Attainment Thresholds and Goal Benchmarks. Should other sources not be available, the State will use state-specific data reported from its ACOs. In particular, the State anticipates using CY2017 historical MassHealth benchmarks for claims-based measures without appropriate national measure specifications, with the benchmark dataset potentially based on performance of MassHealth ACO-eligible members. For these measures, the State will propose Attainment Thresholds and Goal Benchmarks to CMS by November 2018.

The State anticipates using CY2018 MassHealth ACO-attributed benchmarks for patient experience measures, most measures that require chart review, or for most claims-based measures that were not previously collected prior to DSRIP (e.g. the measures in the Care Integration Domain). For these measures, the State will propose Attainment Thresholds and Goal Benchmarks to CMS by November 2019.

For claims-based measures that require more time to develop risk adjustment methodologies the State anticipates using CY2018 and/or CY2019 MassHealth ACO data for the purposes of benchmarking and will propose Attainment Thresholds and Goal Benchmarks to CMS in Q1 CY2022.

For ACO measures which require processing of CP qualifying activities, the State will propose Attainment Thresholds and Goal Benchmarks to CMS in Q4 CY2021.

All proposed benchmarks that the State submits to CMS will have been reviewed by the DSRIP Advisory Committee on Quality, and will be accompanied by individual rationales for each benchmark. CMS will provide written feedback on the proposed benchmarks and rationale within 90 calendar days. If CMS has not provided written feedback within 90 calendar days, then the benchmarks will be deemed approved, given the necessity of providing these benchmarks to ACOs prior to the start of their next Budget Period.

The State will annually evaluate the impact(s) of any measure specification changes on the measure benchmarks, and will review the changes and any need for adjusting established benchmarks with the DSRIP Advisory Committee on Quality. The State will submit to CMS a list of proposed changes to measure benchmarks each November prior to the start of the measurement year. The State will also share a rationale for such changes to CMS, and any changes will be subject to CMS approval.

In response to the public health emergency declared by the state or federal government, the State will utilize CY2020 data to assess the appropriateness of ACO benchmarks (informed by data prior to the start of the public health emergency) on measures in "Pay-for-Performance" status after the start of the public health emergency. Data obtained from CY2020 may be utilized to adjust benchmarks for measures deemed impacted by the public health emergency (i.e., any measure demonstrating a statewide median decrease in performance from CY2019 to CY2020). Updated benchmarks will be proposed to CMS by Q2 CY2022 for approval and will be applied to impacted measures for CY2021.

#### ***5.3.1.2 Calculating ACO Quality Score in Budget Period 1 (BP1)***

Clinical Quality measures in BP1 will be categorized as either "Reporting" or "Pay-for-Reporting" (P4R). Member Experience measures do not factor into the ACO Quality Score in BP1.

"Pay-for-Reporting" (P4R) applies to Hybrid measures which require ACOs to collect and report chart-review data (designated as "Hybrid" in Appendix D). P4R measures factor into the ACO Quality Score for BP1.

"Reporting" applies to administrative or claims-based measures (designated as "Admin" in Appendix D) which do not require ACOs to collect and report chart or record-review data. Reporting measures do not factor into the Total ACO Quality Score for BP1.

#### **Domain-based scoring will not be used in Budget Period (BP) 1**

The score for each Quality Measure in BP1 is calculated using a common methodology, described in this section. Each ACO may receive either zero (0) or one (1) Pay-for-Reporting (P4R) point for each Quality Measure.

- ACOs will earn one (1) Pay-for-Reporting (P4R) point if they provide timely and complete data for each Hybrid measure.
- ACOs will earn zero (0) Pay-for-Reporting (P4R) points if they do not provide timely and complete data for each Hybrid measure. There is no partial credit.

The Total ACO Quality Score in BP1 will be calculated by counting the number of Pay-for-Reporting (P4R) points earned in BP1 (as outlined above) and dividing this number by the number of assigned P4R measures (designated as "Hybrid" in Appendix D).

For example, if an ACO submits timely and complete hybrid or clinical data on four (4) out of the five (5) P4R measures in BP1, the ACO will receive a Total ACO Quality Score in BP1 of **80%**.

### 5.3.1.3 Calculating the Domain Score for Clinical Quality Measures (BP2, BP4, and BP5)

Clinical Quality Measures in BP2 through BP5 will be categorized as either “Reporting” or “Pay-for-Performance” (P4P). “Pay-for-Performance” (P4P) applies to the quality measures for which actual performance (measure score) will be used to calculate the Total ACO Quality Score for BP2 through BP5. Measures enter P4P status in BP2, BP3, or BP4 (as outlined in Appendix D). “Reporting” applies to administrative or claims-based measures which do not require ACOs to collect and report chart-review data. Reporting measures do not factor into the Total ACO Quality Score for BP2 through BP5. There are no Pay-For-Reporting (P4R) points included in BP2 through BP5.

ACOs are eligible to receive two (2) types of points for each Quality Measure: *achievement points* and *improvement points*. The achievement and improvement points are calculated using the methodology described in this section.

#### Achievement Points

Each ACO may receive up to a maximum of ten (10) achievement points for each Quality Measure, as follows:

1. The State will establish an “Attainment Threshold” and a “Goal Benchmark” for each Quality Measure as follows:
  - a. “Attainment Threshold” sets the minimum level of performance at which the ACO can earn achievement points
  - b. “Goal Benchmark” is a high performance standard above which the ACO earns the maximum number of achievement points (i.e., 10 points)
2. The State will calculate each ACO’s performance score on each Quality Measure based on the measure specifications which will be reviewed and approved by CMS (see Section 5.3.4.2). Each Quality Measure’s specifications will describe the detailed methodology by which this performance score is calculated.
3. The State will award each ACO between zero (0) and ten (10) achievement points for each Quality Measure as follows:
  - a. If the ACO’s performance score is less than the Attainment Threshold: 0 achievement points
  - b. If the ACO’s performance score is greater than or equal to the Goal Benchmark: 10 achievement points
  - c. If the performance score is between the Attainment Threshold and Goal Benchmark: the ACO receives a portion of the maximum 10 achievement points in proportion to the ACO’s performance. The State will calculate the number of achievement points using the following formula:
    - i.  $10 * ((\text{Performance Score} - \text{Attainment Threshold}) / (\text{Goal Benchmark} - \text{Attainment Threshold}))$
4. If the State finds that 75% of ACOs have not met the Attainment Thresholds for a particular measure, then the State may reset this benchmark to a lower standard for future Budget Periods with input from the DSRIP Advisory Committee for Quality, and CMS approval. If the State finds

that 75% or more of ACOs have met the Goal Benchmarks for a particular measure, then the State may reset this benchmark to a higher standard for future Budget Periods with input from the DSRIP Advisory Committee for Quality, and CMS approval. If 75% of ACOs meet the adjusted Goal Benchmark, then the State may retire the measure and replace it with a new measure from the same domain. The new measure will enter into the slate as reporting only (if claims measure) or pay for reporting (if hybrid measure) for its first reporting year, switching over to pay for performance in the second or third year, depending on benchmark availability. Benchmarking for the new measure will follow the same methodology as outlined in Section 5.3.1.1

5. The State will calculate Achievement Point totals for every measure, for every BP, for the purposes of the baseline period of the State Accountability Score Calculation (as outlined in Section 5.2.1.3).

Exhibit 32 below shows an example calculation of an ACO’s achievement points for a Quality Measure.

**EXHIBIT 32 – Example Calculation of Achievement Points for Measure A**

**Measure A Attainment Threshold** = 45% (e.g., corresponding to 25<sup>th</sup> percentile of HEDIS benchmarks)

**Measure A Goal Benchmark** = 80% (e.g., corresponding to 90<sup>th</sup> percentile of HEDIS benchmarks)

Example Calculation of Achievement Points for Measure A		
	Measure A Performance Score	Achievement Points Earned
Scenario 1	25%	0
Scenario 2	90%	10
Scenario 3	60%	4.29 *

*\*Achievement points earned = 10\*((60% - 45%) / (80% - 45%)) = 4.29 points*

**Improvement Points (BP2, BP4, and BP5)**

In addition to receiving achievement points based on performance (on a 0 to 10 scale), ACOs may earn improvement points for reaching established improvement targets for each Quality Measure. Improvement points will be calculated as follows:

1. The State will calculate each ACO’s performance score on each Quality Measure based on the measure specifications. Each Quality Measure’s specifications will describe the detailed methodology by which this performance score is calculated.
2. The State will compare each ACO’s performance score on each Quality Measure to the ACO’s performance score on that same Quality Measure from a previous Performance Year (excluding BP3 due to a state of emergency declared by the federal or state government)
3. The State will calculate an Improvement Target for each Quality Measure using the following formula. The Improvement Target is based on at least a 20% improvement each year in the gap between Goal Benchmark and the Attainment Level of each ACO measure.

a. Improvement Target formula = [(Goal Benchmark – Attainment Level) /5]

*For example, for Measure A, if the Attainment Level is 50% and the Goal Benchmark is 60%, the Improvement Target is 2% [(60 – 50)/5]*

- b. For the purposes of calculating the Improvement Target, the result is rounded to the nearest tenth (i.e., one decimal point).

*For example, for Measure B, if the Attainment Level is 80% and the Goal Benchmark is 90.2%, the Improvement Target is calculated to 2.04%  $[(90.2 - 80)/5]$  which rounds to 2.0%.*

- c. Starting in BP2, the ACO may earn up to five (5) improvement points per measure per year for increases in measure score which meet or exceed the improvement target. The same improvement target is used for every ACO for each measure.

*For example, for Measure B, the Improvement Target is 2.0%. If ACO performance in BP4 is 54.0% and if ACO performance in BP5 is 60.0%, the ACO improvement from BP4 to BP5 is 6.0%  $[(60.0-54.0)]$  and the ACO is awarded 5 improvement points. No points above 5 are awarded for increases in excess of the improvement target.*

- d. For the purposes of calculating the difference in ACO quality performance over a previous year, the results are rounded to the nearest tenth (i.e., one decimal point). Rounding takes place after the calculation.

*For example, for Measure B, if ACO performance in BP4 is 54.54% and if ACO performance in BP5 is 60.17%, the ACO improvement from BP4 to BP5 is 5.63%  $[(60.17-54.54)]$ , and the ACO improvement will be rounded to the nearest tenth (i.e., one decimal point) to 5.6%.*

- e. The Improvement Target is based on the higher of the original baseline (BP1) or any year's performance prior to the current BP. This is intended to avoid rewarding regression in performance.

*For example, for Measure B, assume ACO A performance in BP1 is 90.0% and the Improvement Target is 2.0%. If in BP4 the performance for ACO A decreases to 89.0%, in BP5 the ACO would need to reach 92.0% to reach the Improvement Target.*

- f. ACOs will not earn improvement points if performance is lower in the current BP as compared to the prior BP (excluding BP3 due to a state of emergency declared by the federal or state government)

*For example, for Measure B, the Improvement Target is 2.0%. If ACO performance in BP4 is 54.0% and if ACO performance in BP5 is 53.0%, the ACO improvement from BP4 to BP5 is -1.0% and the ACO is not eligible to receive any improvement points.*

- g. There are several special circumstances:
- i. *At or Above Goal:* ACOs with prior BP performance scores equal to or greater than the Goal Benchmark may still earn up to five (5) improvement points in each BP if improvement from the prior BP (excluding BP3 due to a state of emergency declared by the federal or state government) is greater than or equal to the Improvement Target.
  - ii. *At or Below Attainment:* ACOs with prior BP performance scores less than the Attainment Threshold may still earn up to five (5) improvement points each BP if

improvement from the prior BP (excluding BP3 due to a state of emergency declared by the federal or state government) is greater than or equal to the Improvement Target, and performance in the current BP does not equal or exceed the Attainment Threshold. Additionally, ACOs with prior BP performance scores less than the Attainment Threshold and current BP performance scores equal to or above the Attainment Threshold may still earn up to five (5) improvement points if the improvement is greater than or equal to the Improvement Target.

**EXHIBIT 33 – Example Calculation of Improvement Points for Measure B**

Measure B Attainment = 48.9% | Goal = 59.4% | Improvement Target = 2.1%

	BP4 Score	BP5 Score	Improvement	Improvement Target Met	Improvement Points Earned
Scenario 1:	50.0%	52.1%	2.1%	Yes	5
Scenario 2:	50.0%	56.7%	6.7%	Yes	5
Scenario 3:	59.5%	63.0%	3.5%	Yes; above Goal Benchmark	5
Scenario 4:	45.0%	48.0%	3.0%	Yes; below Attainment Threshold	5
Scenario 5:	46.0%	49.0%	3.0 %	Yes; crossing Attainment	5
Scenario 6:	45.0%	46.0%	1.0%	No	0

**Domain Score**

Domain-based scoring will not be used in Budget Period (BP) 1, as described in Section 5.3.1.2. In BP2, BP4, and BP5, for each ACO, the State will sum the ACO’s achievement and improvement points for all Quality Measures within each Quality Domain. Improvement points earned in one Quality Domain may only be summed with achievement points from the same Quality Domain. The total number of points earned by the ACO in each domain cannot exceed the maximum number of achievement points available in the domain. The maximum number of achievement points in the domain is calculated by multiplying the number of Pay-for-Performance (P4P) measures in the domain, in the given BP, by the number of available achievement points per measure.

*For example, if in BP4, there are ten (10) clinical quality measures in Domain X in Pay-for-Performance, and each measure is worth ten (10) achievement points, the maximum number of achievement points in Domain X would be 100. Assume that in BP5 there are now twelve (12) clinical quality measures in Domain X in Pay-for-Performance, and that each measure is worth ten (10) achievement points, the maximum number of achievement points in Domain X would be 120.*

*Cumulative Example:*

*Total number of measures in domain: 2*

*Maximum number of achievement points in the domain = 20*

*Measure Attainment = 48.9% | Goal = 59.4%*

*Improvement Target = [(Goal Benchmark – Attainment Level) /5] = [59.4-48.9]/5 = 2.1*

For example, for Measure A, if ACO performance in BP4 is 54.54% and if ACO performance in BP5 is 58.17% the ACO will earn 8.8 Achievement Points  $[10 * (58.17 - 48.9)/(59.4 - 48.9)]$ . The ACO has

improved from BP4 to BP5 by 3.63% [(58.17 - 54.54)] which will be rounded to the nearest tenth (e.g., one decimal point) to 3.6% which exceeds the Improvement Target of 2.1%. Thus the ACO will earn five (5) improvement points. No points above 5 are awarded for increases in excess of the improvement target.

*In this scenario the ACO would earn 13.8 points.*

If there is only one (1) additional measure in the Domain and the ACO earned 9 total points for this measure; the total score for the ACO would be 20.0 (out of 20) given that domain scores are capped at the maximum number of achievement points (20) in the domain.

Once the total number of points has been calculated, the State will divide the resulting sum by the maximum number of achievement points that the ACO is eligible for in the domain to produce the ACO’s Domain Score. Domain Scores are a value between zero (0) and one (1) expressed as a percentage (i.e., 0% to 100%). In BP2, BP4, and BP5, the State will score each ACO on each P4P Quality Measure unless the ACO does not meet eligibility requirements for a specific measure based on the measure specifications (e.g., it does not meet the minimum denominator requirement) or as otherwise specified in Appendix D. In cases like this, the measure is not factored into the denominator. Reporting measures do not factor into the Domain Score. Additionally, improvement points do not count towards the denominator; they are therefore “bonus” points. Domain Scores are each capped at a maximum value of 100%.

Exhibit 34 below shows an example calculation of an ACO’s unweighted Domain Score for a Quality Domain.

EXHIBIT 34 – Example Calculations of Unweighted Domain Score

Example Calculations of Unweighted Domain Score	
Example 1	Domain only has two Quality Measures (Measure A and Measure B)
	Therefore, maximum number of achievement points is 2x10 = 20 points
	Measure A: Achievement points: 1.5
	Improvement Points: 0
	Measure B: Achievement points: 0
	Improvement Points: 5
	Total achievement points: 1.5 + 0 = 1.5 points
	Total improvement points: 0 + 5 = 5 points
	Sum of achievement and improvement points: 1.5 + 5 = 6.5 points
Unweighted domain score = 6.5/20 * 100 = 32.5%	
Example 2	Domain only has two Quality Measures (Measure A and Measure B)
	Therefore, maximum number of achievement points is 2x10 = 20 points
	Measure A: Achievement points: 8
	Improvement Points: 5



	Measure B:	Achievement points: 9.3
		Improvement Points: 0
	Total achievement points: $8 + 9.3 = 17.3$	
	Total improvement points: 5 points	
	Sum of achievement and improvement points: $17.3 + 5 = 22.3$ points	
	However, total number of points cannot exceed maximum number of achievement points (20)	
	Therefore, total domain points = 20	
	Unweighted domain score = $20/20 * 100 = 100\%$	

#### 5.3.1.4 Calculating the Domain Score for Clinical Quality Measures in BP3

In order to address the impact of the state of emergency declared by the federal or state government on ACO quality performance, domain scores for BP3 are calculated using the following methodology.

##### Achievement Points

For each measure in pay-for-performance status in BP3 (as set forth in Appendix D), the State will decide whether to set the individual ACOs' BP3 measure performance rates to 1) the higher of the ACOs' BP3 or BP2 actual measure rates, or 2) the higher of the ACO's BP2 actual rates or the statewide median rates (i.e., measure level median performance among all ACOs) in BP2.

If the State determines BP3 measure performance rates by comparing the individual ACOs' BP2 actual rates to BP3 actual rates, then ACOs earn achievement points following the scoring approach set forth in Section 5.3.1.3. If the State determines BP3 measure performance rates by comparing individual ACOs' BP2 actual rates to the BP2 statewide median rates, then:

- For measures where an ACO demonstrates a higher BP2 rate than the BP2 statewide median, the ACO earns achievement points based on its own rate, following the scoring approach set forth in Section 5.3.1.3
- For measures where the statewide median demonstrates a higher rate than the ACO's own rate, the ACO earns achievement points based on the statewide median, following the scoring approach set forth in Section 5.3.1.3
- In order to prevent such cases where an ACO's measure performance rate would improve excessively through the use of the statewide median, the number of raw (i.e., percentage) points an ACO may earn when replacing an ACO actual measure rate with that of the statewide median rate is capped at 10 raw points

EXHIBIT 35 - BP3 Measure Rate Calculation with Raw Point Cap = 10.0

	Measure	ACO BP2 Rate	BP2 Statewide Median	Performance Rate Used For BP3	Raw Point Cap
	A	73.0%	74.0%	74.0%	No

B	73.0%	70.0%	73.0%	No
C	73.0%	80.0%	80.0%	No
D	73.0%	84.0%	83.0%*	Yes

\*BP3 Performance Rate ‘capped’ at 83.0% (i.e., 73.0% + maximum allowance of 10.0 raw points, using BP2 state median)

Results from the ‘Performance Rate Used for BP3’ column are then compared to measure benchmarks for the calculation of Achievements Points, following the scoring approach described in Section 5.3.1.3

### Improvement Points

If the State sets individual ACOs’ BP3 measure performance rates to be the ACOs’ actual BP3 measure rates, then the improvement point calculation process will follow the process used for BP2, BP4, and BP5, as described above in Section 5.3.1.2. If the State sets individual ACOs’ BP3 measure performance rates as either individual ACOs’ BP2 rates or the BP2 statewide median rates (capped or uncapped), then improvement point calculation for BP3 is determined by the following methodology:

#### *Step 1: ACO Improvement*

- a. For each applicable measure, ACO BP2 actual rates are compared to ACO BP1 actual rates
  - i. For measures where an ACO demonstrates improvement (i.e., reaches the predetermined improvement targets), the ACO earns improvement points
  - ii. For measures where an ACO fails to demonstrate improvement, then Step 2 is implemented

#### *Step 2: Statewide Median Improvement*

- a. For each applicable measure (i.e., from Step 1.a.ii), the statewide median for BP1 is compared to the statewide median for BP2
  - i. For measures where the State demonstrates improvement (i.e., reaches the predetermined improvement targets), the ACO earns improvement points  
*Note:* The number of measures by which an ACO may use Step 2.a.i to earn improvement points is capped at a number to be determined by the State, thereby preventing an unintended inflation of ACO scores (see example in Exhibit 36)
  - ii. For measures where the State fails to demonstrate improvement, the ACO does not earn improvement points

EXHIBIT 36 - Example of Improvement Point Calculation with Cap = 3 Measures

Note: For purposes of simplicity, this example assumes each measure has the same Improvement Target across measures A-G

Measure Improvement Target = 2.1

State Improvement Median = 2.1

Measure	ACO BP1 Actual Rate	ACO BP2 Actual Rate	ACO Improvement	Improvement Used	Improvement Points Received (Source)
A	50.0%	53.1%	3.1	ACO = 3.1	YES (Step 1)
B	40.0%	49.1%%	9.1	ACO = 9.1	YES (Step 1)
C	59.0%	58.0%	-1.0	State Med = 2.1	YES (Step 2) cap count 1/3
D	65.0%	65.0%	0.0	State Med = 2.1	YES (Step 2) cap count 2/3
E	20.0%	22.0%	2.0	State Med = 2.1	YES (Step 2) cap count 3/3
F	25.0%	26.0%	1.0	State Med = 2.1	NO cap reached*
G	20.0%	30.0%	10.0	ACO = 10.0	YES (Step 1)

\*In this example, this ACO used the state median improvement (2.1) for measures C, D, E, thereby reaching the cap of using the state median 3 times. As such, this ACO may not utilize the state median for measure F.

Note: Use of the state median only ‘counts’ toward the cap in such measures where its usage results in the allocation of improvement points. In other words, in such cases where the state median is higher than ACO improvement, but does not reach the Improvement Target, then use of the state median does not count toward the cap.

**5.3.1.5 Calculating the Domain Score for Member Experience Quality Domains for BP 4-5**

The Member Experience Quality Domains will be calculated based on surveying a representative sample of an ACO’s attributed members to assess their experience of care. The State anticipates assessing member experience for (1) primary care (commencing in CY2018), (2) BH (commencing in CY2019), and (3) LTSS (commencing in CY2020) services.

The State plans to procure a vendor to administer these member experience surveys for ACOs. The State will work in collaboration with its procured vendor to finalize the survey instruments, and identify questions and methodology for calculating survey results. The State is planning to use or adapt (as appropriate) validated instruments wherever possible to capture member experience for each population. For example, the State may use:

- For the population receiving primary care services:

- CAHPS Clinician and Group Survey + CAHPS PCMH supplemental questions
- For the population receiving behavioral health services:
  - Massachusetts Department of Mental Health, Massachusetts Consumer Surveys (MCS): Based off of the Substance Abuse and Mental Health Services Administrations (SAMHSA’s) Mental Health Statistics Improvement Program (MHSIP) survey
- For the population receiving LTSS Services:
  - HCBS CAHPS Survey: recently released by CMS, is the first cross-disability survey of home and community-based service (HCBS) beneficiary’s experience receiving long-term services and supports

ACOs will be evaluated based on surveys of a representative sample of their attributed members. Scores will be based on performance on a combination of composite and specific questions contained in each survey. Examples of question categories include but are not limited to:

EXHIBIT 37 – Examples of Survey Question Categories

Primary Care	Behavioral Health	LTSS
<ul style="list-style-type: none"> <li>● Access to care</li> <li>● Communications</li> <li>● Comprehensiveness</li> <li>● Self-management support</li> <li>● Coordination of care</li> <li>● Helpful, Courteous, and Respectful Office Staff</li> <li>● Patient Ratings of the Provider</li> <li>● Self-management support (composite measure)</li> <li>● Comprehensiveness</li> <li>● Integration or coordination of physical health, BH, LTSS, and health-related social services</li> </ul>	<ul style="list-style-type: none"> <li>● Access to services</li> <li>● Quality and appropriateness</li> <li>● Treatment outcomes</li> <li>● Person-centered planning</li> <li>● Social connectedness</li> <li>● Functioning</li> <li>● Self-determination</li> <li>● Integration or coordination of BH services by Community Partners</li> </ul>	<ul style="list-style-type: none"> <li>● Getting needed services</li> <li>● HCBS staff reliability</li> <li>● Communication with HCBS staff</li> <li>● Getting help from case managers</li> <li>● Choice of services</li> <li>● Personal safety</li> <li>● Adequacy of medical transportation</li> <li>● Community inclusion and empowerment</li> <li>● Employment (supplement)</li> <li>● Integration or coordination of LTSS services by Community Partners</li> </ul>

The scoring approach will be similar to the approach used for clinical quality measures where scoring is based on attainment of benchmarks for excellent performance and/or improved performance relative to previous performance (as described in Section 5.3.1.3).

#### Calculating the Domain Score for Member Experience Quality Domains for BP2 and BP3

In order to address the impact of the state of emergency declared by the federal or state government on ACO quality performance, member experience domain scores for BP2 and BP3 are calculated using the following methodology:

#### Achievement Points

For each composite in the Overall Care Delivery domain, the State will decide whether to set the individual ACOs’ BP3 performance rates to 1) the higher of their BP1 or BP2 actual rates, or 2) the higher of their BP2 or BP3 actual rates. Regardless of which comparison the State decides to use, the rate selected will be

used not just for the BP3 performance rates, but also the BP2 performance rates, given that the timing of BP2 data collection (i.e., January through May of 2020) could lead to BP2 actual rates being variably impacted across ACOs as a result of the state of emergency declared by the federal or state government. Upon determination of the ACOs' BP2 and BP3 performance rates, achievements points will be determined following the process set forth in Section 5.3.1.3.

**EXHIBIT 38 Example of Member Experience Calculation When Deciding Between BP1 and BP2 Actual Rates**

	<b>Composite (Willingness to recommend - Adult)</b>	<b>ACO BP1 Actual Rate</b>	<b>ACO BP2 Actual Rate</b>	<b>Performance Rate Used for Scoring BP 2 and BP3</b>
	<b>ACO A</b>	85%	87.0 %	87.0%
	<b>ACO B</b>	89%	87.0%	89.0%

**Improvement Points**

Improvement point calculation for BP2 and BP3 is determined by the following methodology:

*Step 1: ACO Improvement*

- a. For each composite within a domain, compare ACO BP1 actual rates to BP2 performance rates
  - i. For composites where an ACO demonstrates improvement (i.e., reaches the improvement target), the ACO earns improvement points
  - ii. For composites where an ACO fails to demonstrate improvement, then Step 2 is implemented

*Step 2: Statewide Improvement*

- a. If the State sets individual ACOs' BP2 and BP3 performance rates to be the higher of their actual BP1 or BP2 rates, then for each composite within a domain, compare BP1 statewide median rates to BP2 statewide median rates. If the State sets ACOs' BP2 and BP3 performance rates to be the higher of their BP2 or BP3 actual rates, then for each composite within a domain, compare BP1 statewide median rates to the higher of BP2 statewide median rates or BP3 statewide median rates.
  - i. For composites where the State demonstrates improvement (i.e., reaches the improvement target), the ACO earns improvement points
  - ii. For composites where the State fails to demonstrate targeted improvement, the ACO does not earn improvement points

Note: In order to prevent such cases where an ACO's performance would improve excessively through the use of the statewide median, the number of composites by which an ACO may use Step 2.a.i to earn improvement points is capped at one

**EXHIBIT 39 - Example of Improvement Point Calculation with Cap = 1 Composite**

Note: This example assumes each composite has the same Improvement Target across composites A-D, and that the State is comparing BP1 rates to BP2 rates.

Measure Improvement Target = 1.0

State Improvement Median = 1.0

Composite - Example	ACO BP1 Actual Rate	ACO BP2 Performance Rate	ACO Improvement	Improvement Used	Improvement Points Received (Source)
<b>A – Willingness to Recommend (Adult Survey)</b>	75.1%	75.9%	0.8 (target not met by ACO)	State Med = 1.0	YES (Step 2 applied)
<b>B - Willingness to Recommend (Child Survey)</b>	85.1%	87.0%	1.9 (target met by ACO)	ACO = 1.9	YES (Step 2 not needed)
<b>C - Communications (Adult Survey)</b>	89.5	88.7%	-0.8 (target not met by ACO)	State Med = 1.0	NO (Capped at 1: Composite A already received points)
<b>D - Communications (Child Survey)</b>	78.1%	78.5%	0.4 (target not met by ACO)	State Med = 0.8 (target not met by State)	NO

**Calculation of Composite Scores**

This section clarifies calculation of measures consisting of composite scores, applicable to a specific subset of ACO and CP measures. Two distinct calculations are applicable to composite scores with (1) equally weighted component measures, or (2) unequally weighted component measures. Composite scores with equally weighted component measures consist of ACO and CP member experience measures, ACO *Engagement* measures, ACO *Community Tenure* measure, as well as the ACO and BH CP versions of *Initiation of Alcohol, Opioid, or Other Drug Abuse or Dependence Treatment (IET)* measure.

Calculation of these composite scores consists of the following methodology:

- Achievement points are averaged across component measures within the composite (rounded to nearest tenth)
- Improvement points (applicable to ACO measures only) are averaged across component measures within a composite (rounded to nearest tenth)
- The average composite achievement points value is applied to the sum of total achievement points in the domain
- The average composite improvement points value is applied to the sum of total improvement points in the domain

Composite scores with unequally weighted component measures consist of the BH CP Treatment Plan based composite (i.e., *Engagement* and *Annual Treatment Plan Completion* measures) and the LTSS CP

Care Plan based composite (i.e., *Engagement* and *Annual Care Plan Completion* measures). Calculation of these composite scores consists of the following methodology:

- Achievement points are weighted across component measures within a composite score. The Annual Treatment/Care Plan Completion measure is 80% of the composite score and Engagement is 20% of the composite (rounded to the nearest tenth)
- The weighted composite achievement points value is applied to the sum of total achievement points in the domain

EXHIBIT 40: Example of Composite Scoring (Equally and Unequally Weighted Component Measures)

<b>Composite Scores: Equally Weighted Components</b>	
<b>Domain: Overall Rating and Care Delivery (consisting of 4 composite scores)</b>	Point Calculation
<b>Composite 1: Willingness to Recommend-Adult Survey</b>	Achievement points: 5.6 Improvement points: 5
<b>Composite 2: Willingness to Recommend-Child Survey</b>	Achievement points: 7.5 Improvement points: 0
<b>Composite 3: Communications-Adult Survey</b>	Achievement points: 8.0 Improvement points: 0
<b>Composite 4: Communications-Child Survey</b>	Achievement points: 9.1 Improvement points: 5
<b>Average Achievement points: <math>(5.6 + 7.5 + 8.0 + 9.1)/4 = 7.6</math></b>	
<b>Average Improvement points: <math>(5 + 0 + 0 + 5)/4 = 2.5</math></b>	
<b>Average Achievement points (7.6) and Average Improvement points (2.5) are summed (10.1) as total points. Total number of points cannot exceed the maximum available achievement points within a given domain (in this case 10); therefore, total domain points for the Overall Rating and Care Delivery domain = 10.0</b>	
<b>Composite Scores: Unequally Weighted Components</b>	
<b>Domain: Care Integration (consisting of 2 composite scores)</b>	Point Calculation
<b>Component 1: BH CP Engagement</b>	Achievement points: 5.6 Weighted (20%): $5.6 * (0.2) = 1.1$
<b>Component 2: Annual Treatment Plan</b>	Achievement points: 7.5 Weighted (80%): $7.5 * (0.8) = 6.0$
<b>Sum of weighted components: <math>(1.1 + 6.0) = 7.10</math></b>	



### **5.3.1.6 Quality Data Collection Approach**

Quality measure data will be collected in one of three ways. Claims and encounter data will flow through the normal channels currently used to process and pay claims. Clinical data (i.e., data that will be extracted from EHRs) will initially be submitted to the State by ACOs, using spreadsheets and secure transmission methods (e.g., Secure File Transfer Protocol). The ultimate goal will be to have secure two-way data exchange between the State and ACOs to support continuous sharing of clinical quality data. Member experience will be measured via a patient experience survey performed by a vendor. The State anticipates that the survey will be conducted by typical methodologies such as by mail and/or phone.

### **5.3.2 TCOC component of the ACO DSRIP Accountability Score**

Each ACO's TCOC component of the ACO DSRIP Accountability Score will be a value between zero (0) and one (1) expressed as a percentage (i.e., 0% to 100%) that reflects an ACO's performance at managing TCOC for its enrolled or attributed members. Each ACO's TCOC component of the ACO DSRIP Accountability Score will be calculated in the following manner:

If the ACO is a Primary Care ACO or MCO-Administered ACO, the State will perform the following comparison:

1. In advance of each Budget Period, the State will establish a Preliminary TCOC Benchmark for each ACO, working with the State's actuaries and following the detailed methodology for setting TCOC Benchmarks outlined in the State's ACO contracts
2. Approximately 7-8 quarters after the Budget Period has ended, the State will retrospectively calculate each ACO's TCOC Performance for the Budget Period
3. The State will retrospectively compare each ACO's TCOC Performance to its Final TCOC Benchmark, as set forth in the Primary Care ACO or MCO-Administered ACO contract. TCOC Performance, which will include only the Included Spending Category services set forth in Section 5.2.1.2, will reflect savings or losses after taking into account risk sharing arrangements with the State for the Budget Period. In the process, the State will make several updates to each ACO's Preliminary TCOC Benchmark to produce the ACO's Final TCOC Benchmark for the Included Spending Category services, including, for example, actuarial adjustments to account for the ACO's risk profile and population mix during the Budget Period

If the ACO is an Accountable Care Partnership Plan, the State will perform the following comparison:

4. Approximately 7-8 quarters after the Budget Period has ended, the State will retrospectively calculate each ACO's TCOC Performance for the Budget Period
5. The State will retrospectively compare capitation payments to the Partnership Plan's Non-High Cost Drug/Non-HCV actual medical expenditures (hereinafter "Total Medical Expense (TME)") as set forth in the Accountable Care Partnership Plan contract. TME performance, which will include only the Included Spending Category Services set forth in Section 5.2.1.2, will reflect gains or losses after taking into account risk sharing arrangements with EOHHS for the Budget Period, such as market level risk corridors. Administrative or underwriting gains or losses will not count towards gains or losses used to calculate the TCOC component of the ACO DSRIP Accountability Score

For all ACOs, after performing the above comparisons, the State will calculate the ACO's TCOC component as follows:

6. Based on the comparison, the State will calculate each ACO's TCOC component of the ACO DSRIP Accountability Score as follows:

- If the ACO has savings or medical gains after risk sharing, then the ACO's TCOC component of the ACO DSRIP Accountability Score equals 100%
- If the ACO has losses after risk sharing that exceed 5% of the Final TCOC Benchmark or exceed 5% of the ACO's risk adjusted medical capitation payments, then the ACO's TCOC component of the ACO DSRIP Accountability Score equals 0%
- If the ACO has losses after risk sharing but they do not exceed 5% of the Final TCOC Benchmark or 5% of the ACO's risk adjusted medical capitation payments, then the ACO's TCOC component of the ACO DSRIP Accountability Score is proportionate to the magnitude of the ACO's losses, and is equal to:
  - For Primary Care ACOs and MCO-Administered ACOs:  $(105\% * \text{Final TCOC Benchmark} - \text{TCOC Performance after risk sharing}) / (5\% * \text{Final TCOC Benchmark})$
  - For Partnership Plans:  $(105\% * \text{risk-adjusted medical capitation payments} - \text{TME Performance after risk sharing}) / (5\% * \text{risk adjusted medical capitation payments})$
- If the ACO has neither savings or medical gains nor losses after risk sharing, then the ACO's TCOC component of the ACO DSRIP Accountability score equals 100%.

EXHIBIT 41 – Example Calculations of TCOC component of the ACO DSRIP Accountability Score

Example Calculations of TCOC Component of the ACO DSRIP Accountability Score	
Final TCOC Benchmark = \$500 PMPM	
Scenario 1	ACO's TCOC Plan Share Performance is \$490 PMPM
	ACO has savings after risk sharing of \$10 PMPM, or 2%
	ACO has achieved savings, therefore the ACO's TCOC component of the ACO DSRIP Accountability Score is 100%
Scenario 2	ACO's TCOC Performance is \$550 PMPM
	ACO has losses after risk sharing of \$50, or 10%
	ACO has losses that exceed 5% of the TCOC Benchmark, therefore the ACO's TCOC component of the ACO DSRIP Accountability Score is 0%
Scenario 3	ACO's TCOC Performance is \$520 PMPM
	ACO has losses after risk sharing of \$20, or 4%
	ACO has losses that are less than 5% of the TCOC Benchmark, therefore the ACO's TCOC component of the ACO DSRIP Accountability Score = $((5\% \text{ of the TCOC Benchmark} - \$20) / 5\% \text{ of the TCOC Benchmark}) = ((\$25 - \$20) / \$25) = (\$5/\$25) = 20\%$

### 5.3.3 Impact of DSRIP Accountability Scores on Payments to ACOs

Once the State has determined the ACO's Quality and TCOC components of the ACO's DSRIP Accountability Score, it will calculate the DSRIP Accountability Score using the methodology described in Section 5.3.1. As an example:

#### Example Calculation of ACO DSRIP Accountability Score in BP4

---

- Quality Component of DSRIP Accountability Score in BP4: 75% (calculated as described in Section 5.3.1)
- TCOC Component of DSRIP Accountability Score in BP4: 80% (calculated as described in Section 5.3.2)
- Weight for Quality Component of DSRIP Accountability Score in BP4: 75% (as described in Exhibit 30)
- Weight for TCOC Component of DSRIP Accountability Score in BP4: 25% (as described in Exhibit 30)

$$\text{ACO DSRIP Accountability Score} = (\text{Quality Component} * \text{Weight of Quality Component}) + (\text{TCOC Component} * \text{Weight of TCOC Component}) = (75\% * 75\%) + (80\% * 25\%) * 100\% = 76.2\%$$

---

The DSRIP Accountability Score will then be applied to the ACO funding sub-streams that have a portion of funds at-risk. Specifically:

- ACO Sub-Stream #1 - Startup/Ongoing Funding (Primary Care): No at-risk funds
- ACO Sub-Stream #2 - Startup/Ongoing Funding (Discretionary): Portion of funds are at-risk, according to schedule detailed in Exhibit 20; DSRIP Accountability Score is multiplied by the at-risk funding amount to determine how much is earned
- ACO Sub-Stream #3 - Flexible Services Funding: No at-risk funds
- ACO Sub-Stream #4 - DSTI Glide Path Funding: Portion of funds are at-risk, according to schedule detailed in Exhibit 20; DSRIP Accountability Score is multiplied by the at-risk funding amount to determine how much is earned

### 5.3.4 Process, Roles, and Responsibilities for calculating the ACO DSRIP Accountability Score

#### 5.3.4.1 Roles and responsibilities

The State will be responsible for establishing the elements that comprise the ACO DSRIP Accountability Score, including its Quality Measures, the specifications for each Quality Measure, the data sources for calculating the Quality Measures, the methodology for setting the Attainment Threshold and Goal Benchmark for each Quality Measure (where applicable) and the values of the thresholds and benchmarks themselves. This sub-section 5.3.4.1 details the roles and responsibilities of the State, the State's DSRIP Quality Advisory Committee, and CMS with respect to these elements.

#### 5.3.4.2 The State

The State will establish the elements that comprise the ACO DSRIP Accountability Score, based on the advice of the DSRIP Advisory Committee on Quality as described in this Protocol (see Section 6.2.1). By August 2017, the State will submit the Quality Measure slate and specifications, the benchmark sources, and performance thresholds (i.e., Attainment Thresholds and Goal Benchmarks) to CMS for review and approval.

The State may request modification to any element that comprises the ACO DSRIP Accountability Score, based on its own assessment or on the recommendation of the State's DSRIP Advisory Committee on Quality. In the event that the State wishes to change a previously approved element that is a component of

the ACO DSRIP Accountability Score, the State will submit a formal, written modification request to CMS for review and approval. CMS will have 90 calendar days to review and approve.

As part of its program management and contract oversight processes, the State will establish a structured process for ACOs to seek clarification on or request revisions to certain aspects of their ACO DSRIP Accountability Scores (e.g., if an ACO seeks clarification on the inclusion of certain members in the denominator for a Quality Measure's performance score). Each ACO will identify a key contact, responsible for raising such issues to the State and working with the appropriate State personnel to discuss and resolve issues as appropriate. The State will also identify a reciprocal contact to liaise with each ACO and support these types of requests.

The State may provide an opportunity for ACOs to submit DSRIP Performance Remediation Plans to earn back a portion of the unearned, withheld funds, at the State's discretion. The State may combine remediation opportunities for multiple years to streamline processes (e.g., combining BP2 and BP3 remediation processes into a single remediation process). If the State allows this opportunity, then an ACO may choose to provide the State a DSRIP Performance Remediation Plan within 30 calendar days of receipt of the State's notification of the opportunity to submit a Performance Remediation Plan, in which case the ACO may have the opportunity to earn back up to 60% of the unearned, withheld funds, as further described below.

The DSRIP Performance Remediation Plan will include:

- As specified by the State, a detailed assessment of the reason(s) why:
  - The ACO did not or is not anticipated to achieve a 100% Quality Score, separately addressing State-specified measures on which the ACO scored less than full points; or
  - The ACO did not or is not anticipated to achieve a 100% TCOC Score; or
  - The ACO did not or is not anticipated to perform well on other quality, utilization, cost, or member experience metrics or analyses
- As specified by the State, discrete project(s) the ACO will undertake to address some or all of the reasons identified in the detailed assessment described above, along with rationale for why these activities are appropriate; or other discrete projects that align with the goals of the ACO's DSRIP Participation Plan
- A workplan, which includes a timeline for the implementation of these activities during a time period determined by the State, as well as identification of the resources that will be responsible for their completion
- An accountability plan for these activities, including any milestones or metrics the ACO anticipates and when the ACO anticipates realizing them, and also including a proposed model for the State to monitor the ACO's implementation of the proposed activities and their success or failure throughout the implementation time period (e.g., a schedule of site visits, staff interviews, desk reviews, etc.)

Within 45 calendar days of receiving the Performance Remediation Plan, the State and the Independent Assessor will review the Plan in parallel, and the State, considering the Independent Assessor's recommendation, will either request additional information regarding the Performance Remediation Plan, or approve it. During the State's review process, it will determine how much of the 60% of unearned, withheld funds the ACO will be able to earn back, based on the caliber and relevance of the Performance Remediation Plan to the goals of the ACO's DSRIP Participation Plan. The State will monitor the Plan during the implementation period on an ongoing basis. Additionally, the State will assign a Performance Remediation Plan Score to the ACO, based on the State's ongoing monitoring of the Plan, and supporting documentation submitted by the ACO in its semiannual progress report for the first half of the Budget

Period in question. The Performance Remediation Plan Score will be a single point value between 0 and 10 inclusive, and will determine how much of the ACO's unearned, withheld funds can be earned back.

For example, if (1) an ACO has \$100,000 of unearned, withheld funds; (2) the State determines that an ACO will be able to earn back 50% of the ACO's unearned, withheld funds (out of a 60% maximum percentage); and (3) the ACO achieves a Performance Remediation Plan Score of 7 out of 10, then the ACO's final earned funds will be equal to  $\$100,000 * 50% * (7 / 10) = \$35,000$ .

#### **5.3.4.3 The DSRIP Advisory Committee on Quality**

See Section 6.2.1 for discussion of the Advisory Committee on Quality's role.

### **5.3.5 Timeline of ACO DSRIP Accountability Score data collection, calculation, and disbursement of DSRIP payments**

The timeline for ACO DSRIP Accountability Score calculation and disbursement of DSRIP payments to ACOs is anticipated to be as follows:

- ACO Budget Period Closes
- Member experience survey results 270 calendar days of BP closing
- State determines denominators and sample populations (i.e., the specific members whose data each ACO must submit) for the clinical quality measures within 210 calendar days of BP closing
- ACOs submit clinical quality data within 90 calendar days of receiving the denominators and sample populations for the clinical quality measures
- State calculates ACO DSRIP Accountability Score within 90 calendar days of receiving all underlying required data
- Once ACO DSRIP Accountability Scores have been calculated by the State, the State notifies ACOs of ACO DSRIP Accountability Score within 30 calendar days of determining Score
- State disburses DSRIP at-risk payments to ACOs within 30 calendar days of notification of their ACO DSRIP Accountability Scores

### **5.3.6 ACO Exit from the DSRIP Program**

Per STC 69(b)(ii), if an ACO decides to exit the DSRIP program prior to the end of the five year 1115 waiver demonstration period, it will be required to return at least 50 percent of DSRIP startup/ongoing and DSTI Glide Path funding received up to that point.

ACO exit from the DSRIP program is defined as termination of the contract between an ACO and MassHealth for reasons other than the following reasons:

- Material financial losses resulting from poor total cost of care performance, as determined by the State
- Reasons outside of the ACO's control, including but not limited to material changes to the Medicaid program, or material changes to the nature of the ACO's participation in MassHealth resulting from legislation or other developments, as determined by the State
- Transition to a different ACO model (e.g., the ACO Partner in an Accountable Care Partnership Plan is approved to become a Primary Care ACO)

#### **5.3.6.1 Other ACO Contract Terminations**

Under its MassHealth contract, an ACO may experience material financial loss, defined as a loss greater than 3% medical losses relative to risk-adjusted medical capitation for Partnership Plans, or relative to the

TCOC benchmark for Primary Care ACOs and MCO-Administered ACOs. If an ACO experiences material financial loss in one or more preceding Budget Periods and has a projected material financial loss in the current Budget Period, the contract between the ACO and MassHealth may be terminated and the ACO will be required to return DSRIP startup/ongoing and DSTI Glide Path funding in accordance with percentages established by the State.

If the ACO’s contract is terminated because the ACO, or in the case of an ACPP, the ACO Partner, is transitioning to a different ACO model, the State may waive the requirement that the ACO return DSRIP startup/ongoing and DSTI Glide Path funding to the State.

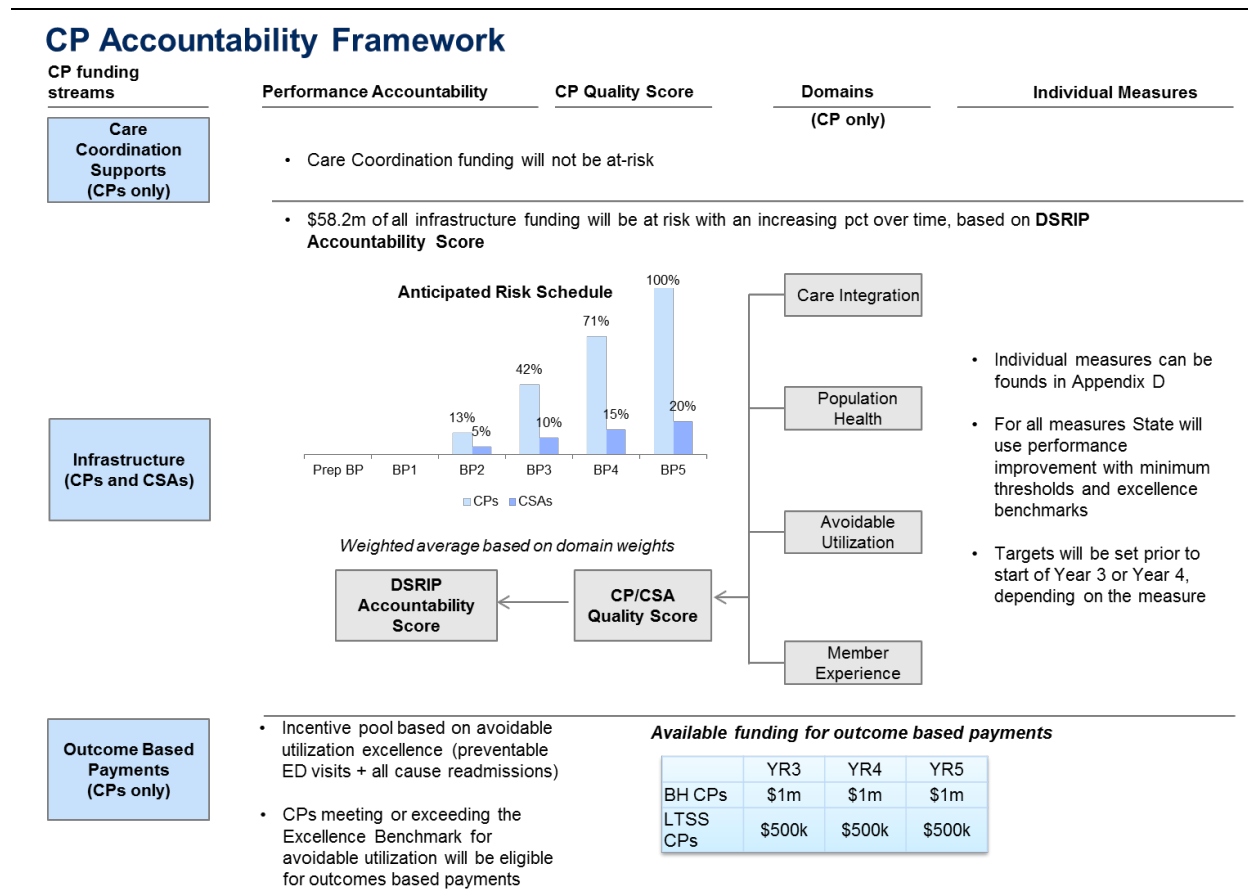
If the ACO’s contract is terminated and a portion of its practice sites join another ACO, then the State may reduce the amount of DSRIP startup/ongoing and DSTI Glide Path funding that the ACO is required to return to the State. In such cases, the State may reduce the required amount to be returned by the percentage of the ACO’s enrolled members attributed to the primary care practice sites joining another ACO.

## 5.4 Accountability Framework & Performance Based Payments for CPs and CSAs

### 5.4.1 Overview

As described in Section 4.5 above, payment streams for CPs and CSAs are subject to an accountability framework that aligns the CPs’ and CSAs’ incentives with the State’s delivery system reform goals. For CPs and CSAs, a portion of the Infrastructure funds will be at-risk based on performance.

EXHIBIT 42 – CP and CSA Accountability Framework



#### **5.4.2 Alignment of Quality Measure Slate with Overall Goals of the DSRIP program**

The quality measure slate was chosen to support the goals of the DSRIP program including promoting member-driven, integrated, coordinated care and improving integration among physical health, behavioral health, long-term services and supports, and health-related social services. In addition, the CP and CSA measure slate has many cross-cutting measures with the ACO measure slate thus aligning the ACOs with their CPs and with CSAs.

Appendix D contains the measures for the LTSS and BH CPs and CSAs, along with an indication as to whether the measure data will be collected via claims and encounters only or whether chart review will be utilized. Additionally, there is an indication of the expected “reporting” and/or “performance” role in the program by program year. Appendix D includes further details regarding the measures including measure descriptions, measure stewards, benchmark sources and reporting frequency.

In the event of a state of emergency declared by the federal or state government, due dates for quality-related benchmarks and rates that the State must submit to CMS shall be extended by at least two months, as determined by the State and CMS.

#### **5.4.3 Pay for Reporting vs. Pay for Performance**

As demonstrated in Appendix D, the State anticipates that most Quality Measures will transition from Pay for Reporting (P4R) to Pay for Performance (P4P) over the duration of the program. All CP measures in the first two performance years are Reporting or Pay for Reporting (P4R), with a subset transitioning to Pay for Performance (P4P) starting in Performance Year 3. All measures will transition to P4P by Performance Year 4. Given the unique needs and demographics of the member populations supported by the CPs and CSAs, there are challenges to utilizing nationally established benchmarks for performance that reflect the overall population. Therefore, the State will utilize the first two Performance Years of the demonstration to establish an appropriate baseline and achievement targets as described below for the quality measures. This will allow time for familiarization with the measures, data collection, reporting, as well as to provide baseline performance. This will also allow for two years of data to confirm, as needed:

- Numerator details
- Denominator details and exclusions
- Sampling methodology
- Sample size
- Data sources
- Measure reliability from year-to-year

#### **5.4.4 Calculating the CP/CSA DSRIP Accountability Score**

The State will measure performance using a state-calculated score called the CP/CSA DSRIP Accountability Score. The CP/CSA DSRIP Accountability Score is a value between zero (0) and one hundred (100), expressed as a percentage (i.e. between 0%-100%). This section details the State’s calculation of each CP’s and CSA’s CP/CSA DSRIP Accountability Score as follows:

- 5.4.4.1 Measure Scoring Methodology for All Measures
- 5.4.4.2 Calculating the Domain Score
- 5.4.4.3 Combining Domain Scores to Produce Quality Score
- 5.4.4.4 Comparing Quality Scores to Calculate the CP/CSA DSRIP Accountability Score



#### *5.4.4.1 Measure Scoring Methodology for All Measures*

CPs and CSAs will be accountable for all measures as indicated in Appendix D unless the CP or CSA does not meet eligibility requirements for a specific measure based on the measure's specifications (e.g., a minimum denominator required).

##### **Benchmark Determination**

Given that the CP population is defined by utilization criteria and therefore does not have national benchmarks, the State anticipates using historical CY2018 and/or CY2019 data to inform benchmarking determinations for all claims-based measures, and CY2018 through CY2020 data to inform benchmarking determinations for all member experience measures. For example, the BH CP population by definition will include high-risk members with significant behavioral health diagnoses in addition to high utilization. National benchmarks for a general Medicaid population will be difficult to use for this selected high risk population; accordingly, the State will need to develop state-specific benchmarks.

In addition to requiring standard MassHealth administrative data for calculation, many CP and CSA measures also require additional data types or inputs including Medicare administrative data, data from the submission of Qualifying Activities, hybrid data, and risk-adjusted data. Given the limitations associated with availability of those data and in recognition of time needed for processing and analysis, the State will propose Attainment Thresholds and Goal Benchmarks to CMS as follows (see Appendix D for reference):

- For all LTSS CP and BH CP measures that can be calculated from MassHealth administrative data alone, inclusive of measures requiring Qualifying Activities, thresholds and benchmarks will be submitted in Q4 CY2021.
- For BH CP claims-based measures that require Medicare data in addition to Medicaid data, thresholds and benchmarks will be submitted in Q4 CY2021.
- For the CSA hybrid measure, thresholds and benchmarks will be submitted by September 2020 based on data sampled from CY2019 performance.
- For the CSA member experience measures, thresholds and benchmarks will be submitted by September 2020.
- For the BH CP and LTSS CP member experience measures (member engagement and care planning submeasures), thresholds and benchmarks will be submitted by Q4 2021.
- For the BH CP and LTSS CP member experience measures (community tenure submeasure), thresholds and benchmarks will be submitted in Q4 CY2021.

All proposed benchmarks that the State submits will have been reviewed by the DSRIP Advisory Committee on Quality, and will be accompanied by individual rationales for each benchmark. CMS will provide written feedback on the proposed benchmarks and rationale within 90 calendar days. If CMS has not provided written feedback within 90 calendar days, then the benchmarks will be deemed approved, given the necessity of providing these benchmarks to CPs so that they have sufficient time to plan accordingly.

Benchmarks will be adjusted based on expert clinical judgment from the DSRIP Advisory Committee on Quality and the State, with approval by CMS. Attainment Thresholds will be reviewed yearly and may be adjusted by the State based on prior CP or CSA performance, in consultation with the DSRIP Advisory Committee for Quality, and CMS approval. If all CPs have high levels of achievement on a particular measure, that measure will be retired and a new one may be added. Goal Benchmarks will be reviewed yearly and set with respect to the CP performance from the prior year. This will properly reward maintenance of quality, while not overly penalizing CPs.

In response to the public health emergency declared by the state or federal government, the State will utilize CY2020 data to assess the appropriateness of CP benchmarks (informed by data prior to the start of the public health emergency) on measures in "Pay-for-Performance" status after the start of the public health

emergency. Data obtained from CY2020 may be utilized to adjust benchmarks for measures deemed impacted by the public health emergency (i.e., any measure demonstrating a statewide median decrease in performance from CY2019 to CY2020). Updated benchmarks will be proposed to CMS by Q2 CY2022 for approval and will be applied to impacted measures for CY2021.

CPs and CSAs will be assigned achievement points based on their performance on each Quality Measure. The Domain Score will be calculated as the average of the achievement points for all the Quality measures in a given Domain.

Each CP or CSA may receive up to a maximum of one (1) achievement point for each Quality Measure in a given Domain, as follows:

1. The State will establish an “Attainment Threshold” and an “Goal Benchmark” for each Quality Measure
  - a. “Attainment Threshold” sets the minimum level of performance at which the CP or CSA can earn achievement points
  - b. “Goal Benchmark” is a high performance standard above which the CP or CSA earns the maximum number of achievement points (i.e., 1 point)
2. The State will calculate each CP’s and CSA’s performance score on each Quality Measure based on the measure specifications which will be reviewed and approved by CMS (see Section 5.4.6.1). Each Quality Measure’s specifications will describe the detailed methodology by which this performance score is calculated
3. The State will award each CP or CSA between zero (0) and one (1) achievement point for each Quality Measure as follows:
  - a. If the CP’s or CSA’s performance score is less than the Attainment Threshold: 0 achievement points
  - b. If the CP’s or CSA’s performance score is greater than or equal to the Goal Benchmark: 1 achievement point
  - c. If the CP’s or CSA’s performance score is between the Attainment Threshold and Goal Benchmark: the CP or CSA receives a portion of the maximum 1 achievement point; this portion is proportional to the CP’s or CSA’s performance. The State will calculate the achievement point using the following formula:
    - i.  $1 * ((\text{Performance Score} - \text{Attainment Threshold}) / (\text{Goal Benchmark} - \text{Attainment Threshold}))$

Exhibit 43 below shows an example calculation of a CP’s achievement points for a Quality Measure.

**EXHIBIT 43 – Example Calculation of Achievement Points for Measure A**

**Measure A Attainment Threshold = 45%**

**Measure A Goal Benchmark = 80%**

Example Calculation of Achievement Points for Measure A	
Measure A Performance Score	Achievement Points Earned

Scenario 1	25%	0
Scenario 2	90%	1
Scenario 3	58%	0.37 *

\*Achievement points earned =  $1 * ((58\% - 45\%) / (80\% - 45\%)) = 0.37$  points

#### 5.4.4.2 Calculating the Domain Score

Each Quality Domain comprises several Quality Measures. For each CP or CSA, the State will calculate the average achievement points for all Quality Measures in each Quality Domain.

Exhibit 44 below shows an example calculation of a CP's or CSA's Domain Score for a Quality Domain.

EXHIBIT 44 – Example Calculation of CP or CSA Quality Domain Score

Example Calculation of a CP's or CSA's Domain Score for a Quality Domain				
Measures in Quality Domain	Attainment Threshold	Goal Benchmark	Performance Score	Achievement Points Earned
Measure A	45%	80%	58%	0.37
Measure B	40%	75%	60%	0.57
Measure C	41%	85%	79%	0.86
<b>Average Achievement Points Earned</b>				<b>0.60</b>

#### 5.4.4.3 Combining Domain Scores to Produce the Quality Score

A CP's or CSA's Quality Score will be a weighted average of scores the CP or CSA achieves on the different Domains for which it is accountable. The anticipated Domains and Domain weighting is different across BH CPs, LTSS CPs and CSAs, as set forth in the following Exhibits.

EXHIBIT 45 – Domain Weighting for BH CPs

BH CP Quality Domain Weights			
Quality Domain		Domain Weight BP 3	Domain Weight BP 4 - 5
1	Care Integration	45%	40%
2	Population Health	40%	35%
3	Avoidable Utilization	15%	10%
4	Member Experience	--	15%
<b>TOTAL</b>		<b>100%</b>	<b>100%</b>

See Appendix D for the full list of BH CP Quality Measures

EXHIBIT 46 – Domain Weighting for CSAs

CSA Quality Domain Weights		
Quality Domain	Domain Weight BP 3	Domain Weight BP 4 - 5

1	Care Integration	100%	50%
2	Member Experience	0%	50%
TOTAL		100%	100%

See Appendix D for the full list of CSA Quality Measures.

EXHIBIT 47 – Domain Weighting for LTSS CPs

LTSS CP Quality Domain Weights			
Quality Domain		Domain Weight BP 3	Domain Weight BP 4 - 5
1	Care Integration	52%	40%
2	Population Health	32%	25%
3	Avoidable Utilization	16%	15%
4	Member Experience	0%	20%
TOTAL		100%	100%

See Appendix D for the full list of LTSS CP Quality Measures

EXHIBIT 48 – Example Calculation of the Quality Score for a BH CP

Example Calculation of Total Quality Score			
Domain	Weighting	Average Attainment Score	Weighted Attainment Score
Care Integration	40%	0.51	40%*0.51= 20.4%
Population Health	35%	0.60	35%*0.60= 21.0%
Avoidable Utilization	10%	0.73	10%*.73= 7.3%
Member Experience	15%	0.88	15%*0.88= 13.2%
Total Quality Score			61.90%

*5.4.4.4 Comparing Quality Scores to Calculate the CP/CSA DSRIP Accountability Score in BP3*

This section clarifies the application of sections 5.4.4.2 and 5.4.4.3 to BP3 to address the impact of the state of emergency declared by the federal or state government.

**Achievement Points**

For each measure in pay-for-performance status in BP3 (as set forth in Appendix D), the State will decide whether to set the individual CPs/CSAs' BP3 measure performance rates to 1) the higher of the CPs/CSAs' BP3 or BP2 actual measure rates, or 2) the higher of the CPs/CSAs' BP2 actual rates or the statewide median rates (i.e., measure level median performance among all CPs/CSAs) in BP2.

If the State determines BP3 measure performance rates by comparing the individual CPs/CSAs' BP2 actual rates to BP3 actual rates, then CPs/CSAs earn achievement points following the scoring approach

set forth in Section 5.3.1.3. If the State determines BP3 measure performance rates by comparing individual CPs/CSAs' BP2 actual rates to the BP2 statewide median rates, then:

- For measures where a CP/CSA demonstrates a higher BP2 rate than the BP2 statewide median, the CP/CSA earns achievement points based on its own rate, following the scoring approach described in Section 5.4.4.1
- For measures where the statewide median demonstrates a higher rate than the CP/CSA's own rate, the CP/CSA earns achievement points based on the statewide median, following the scoring approach described in Section 5.4.4.1
- In order to prevent such cases where a CP/CSA's performance measure rate would improve excessively through the use of the statewide median, the number of raw (i.e., percentage) points a CP/CSA may earn when replacing a measure rate with that of the Statewide Median rate is capped at 15 raw points

EXHIBIT 49 - BP3 Measure Rate Calculation with Raw Point Cap = 15.0

Measure	BP2 CP/CSA Actual Rate	BP2 Statewide Median	Performance Rate Used For BP3	Raw Point Cap
A	73.0%	74.0%	74.0%	No
B	73.0%	70.0%	73.0%	No
C	73.0%	80.0%	80.0%	No
D	73.0%	89.0%	88.0%*	Yes

\*BP3 Rate 'capped' at 88.0% (i.e., 73.0% + maximum allowance of 15.0 raw points, using BP2 State Median)

Results from the 'Performance Rate Used For BP3' column are then compared to measure benchmarks for the calculation of Achievements Points (as outlined in Section 5.4.4.1)

**5.4.4.5 Comparing Quality Scores to Calculate the CP/CSA DSRIP Accountability Score**

For each Performance Period CPs and CSAs will be measured on their (1) Total Quality Score and on (2) Improvement Over Self from the previous Performance Period. For each Performance Period, the State will set a Minimum Quality Score Threshold and a Goal Quality Score Benchmark for LTSS CPs, for BH CPs and for CSAs. Improvement Over Self will be calculated as 50% of the CP's or CSA's improvement year over year in percentage points.

The CP/CSA DSRIP Accountability Score, therefore, will be the sum of the (1) Total Quality Score and the (2) Improvement Over Self contribution. CP/CSA DSRIP Accountability Scores will be calculated as follows:

- An entity with a Total Quality Score at or above the Goal Quality Score Benchmark will receive a DSRIP Accountability Score of 100% and be eligible for 100% of at-risk funds.
- An entity with a Total Quality Score below the Minimum Quality Score Threshold will receive a DSRIP Accountability Score for Total Quality of Zero and will be eligible for only that portion of at-risk funds equal to the Improvement Over Self contribution. The entity would receive a Quality Score equal to 50% of the Improvement Over Self percentage points.
- An entity with a Total Quality Score between the Minimum Quality Score Threshold and the Goal Quality Score Benchmark will receive a DSRIP Accountability Score = (Total Quality Score) +

(50% of the Improvement Over Self percentage points) and will be eligible for that proportion of the at-risk funds.

For example:

In a Performance Period in which, for BH CPs, the Minimum Quality Score Threshold is set at 45% and the Goal Quality Score Benchmark is set at 85%

- A BH CP with a Total Quality Score  $\geq 85\%$  has a DSRIP Accountability Score of 100% and is eligible for 100% of the at-risk funds
- A BH CP with a Total Quality Score  $< 45\%$  and with no improvement from the previous period has a DSRIP Accountability Score of 0% and is eligible only for improvement points. If a CP's Total Quality Score = 40% and a previous period Total Quality Score of 30%, then they would receive half of their Improvement Over Self percentage points, or  $50\% * 10\% = 5\%$  of at-risk DSRIP funds.
- A BH CP with a Quality Score of 75% and a previous period Quality Score of 65% has a DSRIP Accountability Score of 80% ( $75\% + 50\%$  of  $(75\% - 65\%)$ )

Budget Period 1 is reporting only and Budget Period 2 is reporting or pay-for-reporting as outlined in Appendix D. CPs and CSAs will be eligible for funds at risk in Budget Period 2 provided they comply with pay-for-reporting requirements. For example, if all required reporting elements are met (i.e., within minimum reporting standards set by the State), the entity will be eligible for 100% of the at-risk funds.

Should a new CP or CSA join the program, the new CP's or CSA's first Budget Period will be used to establish baseline data for relevant Quality Measures. Should significant numbers (e.g., 10% increase in members) of new CPs or CSAs join the program, achievement targets may need to be re-calculated. The State will submit any such modification requests as described below in Section 5.4.6.1.

#### **5.4.5 Outcomes Based Payments**

Beginning in Performance Year 3, the State will establish an annual outcomes-based payment pool for both the BH and LTSS CPs. Any CP equaling or exceeding the Goal Benchmark for either of the two measures in the Avoidable Utilization domain in a given Budget Period will be eligible for outcomes-based payments for that Budget Period. Further, each of the two measures within the Avoidable Utilization domain will correspond to 50% of available funds within the outcomes-based payment pools for the BH CP and LTSS CP programs. For example, a BH CP that equals or exceeds the Goal Benchmark for an Avoidable Utilization measure will be eligible to share in the 50% of available funds within the BH CP outcomes-based payment pool for a specific Budget Period.

Each eligible CP will receive a portion of the outcomes-based payment pool based on the total number of eligible CPs. For example, if the total number of CPs that equal or exceed the Goal Benchmark for a measure within the Avoidable Utilization domain is 3, then each CP would receive 33.3% of the 50% of available funds within the outcomes-based payment pool corresponding to that measure.

#### **5.4.6 Process for calculating CP/CSA DSRIP Accountability Scores**

##### **5.4.6.1 Roles and responsibilities**

The State will be responsible for establishing the elements that comprise the calculating CP/CSA DSRIP Accountability Scores, including its Quality Measures, the specifications for each Quality Measure, the data sources for calculating the Quality Measures, the methodology for setting the Attainment Threshold and Goal Benchmark for each Quality Measure (where applicable), and the values of the thresholds and benchmarks themselves. The State will also establish the Minimum Quality Score Threshold and the Goal Quality Score Benchmark used to calculate the CP/CSA DSRIP Accountability Score. This sub-section

5.4.6.1 details the roles and responsibilities of the State, the State’s DSRIP Advisory Committee, and CMS with respect to establishing these elements.

#### The State

The State will establish the elements that comprise the CP and CSA DSRIP Accountability Score, based on the advice of the DSRIP Advisory Committee on Quality (see Section 6.2.1). The State will submit the Quality Measure slate and specifications to CMS for review and approval by November 2017.

Given that the State will be using the first two Budget Periods to gather baseline data to inform performance target setting beginning in BP3 (i.e. CY 2020), it will not have finalized data to calculate the BP3-BP5 targets until after the start of BP3. As such, the State will submit benchmark sources and preliminary performance thresholds (i.e., Attainment Thresholds and Goal Benchmarks) to CMS for review and approval in Q4 CY2021 (see Appendix D for reference). CMS will have 90 calendar days to review and approve. Once the State has processed the BP2 data, in November 2020, it will submit finalized performance targets based on both BP1 and BP2 data to CMS for review and approval. CMS will have 90 calendar days to review and approve.

The State may request modification to any element that comprises the CP/CSA DSRIP Accountability Score, based on its own assessment or on the recommendation of the State’s DSRIP Advisory Committee on Quality. In the event that the State wishes to change a previously approved element that is a component of the CP/CSA DSRIP Accountability Score, the State will submit a formal, written modification request to CMS for review and approval. CMS will have 90 calendar days to review and approve.

As part of its program management and contract oversight processes, the State will establish a structured process for CPs and CSAs to seek clarification on or request revisions to certain aspects of their CP/CSA DSRIP Accountability Scores (e.g., if a CP seeks clarification on the inclusion of certain members in the denominator for a Quality Measure’s performance score). Each CP and CSA will identify a key contact, responsible for raising such issues to the State and working with the appropriate State personnel to discuss and resolve issues as appropriate. The State will also identify a reciprocal contact to liaise with each CP and CSA and support these types of requests.

The State may provide an opportunity for CPs or CSAs to submit DSRIP Performance Remediation Plans to earn back a portion of the unearned, withheld funds, at the State’s discretion. The State may combine remediation opportunities for multiple years to streamline processes (e.g., combining BP2 and BP3 remediation processes into a single remediation process). If the State allows this opportunity, then a CP or CSA may choose to provide the State a DSRIP Performance Remediation Plan within 30 calendar days of receipt of the State’s notification of the opportunity to submit a Performance Remediation Plan, in which case the CP or CSA may have the opportunity to earn back up to 60% of the unearned, withheld funds, as further described below.

The DSRIP Performance Remediation Plan will include:

- As specified by the State, a detailed assessment of the reason(s) why:
  - The CP or CSA did not or is not anticipated to achieve a 100% Accountability Score, separately addressing State-specified measures on which the CP or CSA scored less than full points; or
  - The CP or CSA did not or is not anticipated to perform well on other quality, utilization, cost, or member experience metrics or analyses
- As specified by the State, discrete project(s) the CP or CSA will undertake to address some or all of the reasons identified in the detailed assessment described above, along with rationale for why these activities are appropriate; or other discrete projects that align with the goals of the CP or CSA’s DSRIP Participation Plan



- A workplan, which includes a timeline for the implementation of these activities during a time period determined by the State, as well as identification of the resources that will be responsible for their completion
- An accountability plan for these activities, including any milestones or metrics the CP or CSA anticipates and when the CP or CSA anticipates realizing them, and also including a proposed model for the State to monitor the CP or CSA implementation of the proposed activities and their success or failure throughout implementation time period (e.g., a schedule of site visits, staff interviews, desk reviews, etc.)

Within 45 calendar days of receiving the Performance Remediation Plan, the State and the Independent Assessor will review the Plan in parallel, and the State, considering the Independent Assessor recommendation, will either request additional information regarding the Performance Remediation Plan, or approve it. During the State's review process, it will determine how much of the 60% of unearned, withheld funds the CP or CSA will be able to earn back, based on the caliber and relevance of the Performance Remediation Plan to the goals of the CP or CSA's DSRIP Participation Plan. The State will monitor the Plan during the implementation period on an ongoing basis. Additionally, the State will assign a Performance Remediation Plan Score to the CP or CSA, based on the State's ongoing monitoring of the Plan, and supporting documentation submitted by the CP or CSA in its semiannual progress report for the first half of the Budget Period in question. The Performance Remediation Plan Score will be a single point value between 0 and 10 inclusive, and will determine how much of the CP or CSA's unearned, withheld funds can be earned back.

For example, if (1) a CP or CSA has \$100,000 of unearned, withheld funds; (2) the State determines that a CP or CSA will be able to earn back 50% of the CP or CSA's unearned, withheld funds (out of a 60% maximum percentage); and (3) the CP or CSA achieves a Performance Remediation Plan Score of 7 out of 10, then the CP or CSA's final earned funds will be equal to  $\$100,000 * 50% * (7 / 10) = \$35,000$ .

#### The DSRIP Advisory Committee on Quality

See Section 6.2.1 for discussion of the Advisory Committee on Quality's role.

#### **5.4.7 Timeline of CP DSRIP Accountability Score data collection, calculation, and disbursement of DSRIP payments**

The timeline for CP DSRIP Accountability Score calculation and disbursement of DSRIP payments to CPs is anticipated to be as follows:

- CP and CSA Budget Period Closes
- Member experience survey results within 270 calendar days of BP closing
- State determines denominators and sample populations (i.e., the specific members whose data each CP must submit) for the clinical quality measures within 210 calendar days of BP closing
- CPs and CSAs submit clinical quality data within 30 calendar days of receiving the denominators and sample populations for the clinical quality measures
- State calculates CP and CSA DSRIP Accountability Score within 120 calendar days of receiving all underlying required data
- Once CP and CSA DSRIP Accountability Scores have been calculated by the State, the State notifies CPs and CSAs of CP and CSA DSRIP Accountability Score within 30 calendar days of determining Score
- State disburses DSRIP at-risk payments to CPs and CSAs within 30 calendar days of notification of their CP and CSA DSRIP Accountability Scores

## 5.5 Reporting Requirements for ACOs, CPs and CSAs

### 5.5.1 Semiannual Participation Plan Progress Reports

ACOs, CPs, and CSAs participating in the DSRIP program will submit semiannual reports to the State demonstrating progress with their Participation Plans, plans for continued implementation of the approved Participation Plan, areas for improvement and an account of budget expenditures. The State will provide templates for the semiannual progress report which will specify the data that ACOs, CPs and CSAs will need to submit. ACOs, CPs and CSAs must submit their semiannual progress reports in order to receive further DSRIP funding. For example, if an ACO, CP or CSA submits a semiannual progress report three months after the end of BP2, then it will be able to receive DSRIP payments from three months after the end of BP2 until the next required semiannual progress report submission date (i.e. two months after the midway point of BP3).

ACO semiannual progress reports will be submitted in a form and format prescribed by the State, and may include information such as:

- The ACO's progress toward implementation of the Participation Plan
- The progress and status of specific investments and programs supported by DSRIP funds, including any findings from or modifications to these investments and programs
- Descriptions of recent activities and accomplishments
- Descriptions of upcoming activities and challenges
- Budget expenditures for all DSRIP funding
- If relevant, supporting documentation for a DSRIP Performance Remediation Plan
- Additional information as requested by EOHHS.

As noted above, ACOs will submit progress reports twice annually. The Progress Report 1 will be due two months after the midway point of a given BP and Progress Report 2 will be due three months following the close of the Budget Period. The below provides the timeline for submission of such reports for the Preparation Budget Period as well as Budget Period 1. Budget Periods 2-5 will follow the same pattern as Budget Period 1, adjusted for the respective years.

- **Preparation Budget Period Progress Report:** This report is due no later than **March 31, 2018** and shall include the information detailed above for the **Preparation Budget Period (July 1 – December 31, 2017)**
- **BP1 Progress Report 1:** This report is due no later than **August 31, 2018** and shall include the information detailed above for the period of **January 1 - June 30, 2018**
- **BP1 Progress Report 2:** This report is due no later than **March 31, 2019** and shall include the information detailed above for the period of **January 1 - December 31, 2018**

The content for ACO Progress Reports 1 and 2 for a given Budget Period may differ, as Progress Report 2 provides detailed information about the entire Budget Period, whereas Progress Report 1 only covers the first half of the Budget Period. In the event of a state of emergency declared by the federal or state government, due dates for reports shall be extended by at least a month, as determined by the State.

For CPs and CSAs, semiannual progress reports will be submitted in a form and format prescribed by the State, and may include:

- Descriptions of successes, barriers, challenges, and lessons learned regarding, at a minimum, outreach, care coordination, and integration of care
- Summary of CP care coordination supports activities
- Budget expenditures for all DSRIP funding
- Supporting documentation for DSRIP Performance Enhancement Plans (if relevant)
- Additional information as requested by EOHHS

The below provides the timelines for submission of such reports for the CPs/CSAs Preparation Budget Period as well as Budget Periods 1 and 2. Budget periods 3-5 will follow the same pattern as Budget Period 2 adjusted for the respective year

- **Preparation Budget Period Progress Report:** This report is due no later than **August 31, 2018** and shall include the information detailed above for the **Preparation Budget Period (October November 2017 – May 31, 2018)**
- **BP1 Progress Report 2:** This report is due no later than **March 31, 2019** and shall include the information detailed above for the period of **June 1, 2018 – December 31, 2018**
- **BP2 Progress Report 1:** This report is due no later than **August 31, 2019** and shall include the information detailed above for the period of **January 1 - June 30, 2019**
- **BP2 Progress Report 2:** This report is due no later than **March 31, 2020** and shall include the information detailed above for the period of **January 1 - December 31, 2019**

The content for CP or CSA Progress Reports 1 and 2 for a given Budget Period may differ, as Progress Report 2 provides detailed information about the entire Budget Period, whereas Progress Report 1 only covers the first half of the Budget Period. In the event of a state of emergency declared by the federal or state government, due dates for reports shall be extended by at least a month, as determined by the State.

### 5.5.2 Review and Approval of Semiannual Progress Reports

The State and the Independent Assessor will review the semiannual progress reports (see Section 6.2.2 for details). The State and the Independent Assessor will have a total of 45 calendar days to review and approve the report, or request additional information regarding the information reported. All approved semiannual progress reports will be sent to CMS.

### 5.5.3 Additional Reporting Requirements

ACOs, CPs, and CSAs must annually submit clinical quality data to the State for quality evaluation purposes. For example, as noted in Appendix D, the State has proposed three types of quality measures. The first type is solely based on claims or administrative data and will be calculated by the State with no further input (other than claims previously submitted) from the ACO/CP/CSA. The second type of quality measure is based on patient experience survey data, and will be collected by a state-procured survey vendor. The third type of quality measure will require both claims information and clinical (e.g. blood pressure) or administrative (e.g. completion of an assessment) information not available through claims. The State will produce the denominators for quality measures based on claims or other information and then submit the denominator to the ACO, CP, or CSA for completion of the numerator information. The State will then receive the numerator information from the ACOs, CPs, or CSAs and calculate performance. The State will conduct audits of the clinical quality data submitted by ACOs, CPs, and CSAs to ensure that the data are accurate.

Additionally, ACOs will need to submit their ACO revenue payer mix for safety net categorization purposes. CPs will need to submit to the State their roster of engaged members. All entities will also be responsible for ad hoc reporting as requested by the State.

## **Section 6. State Operations, Implementation, Governance, Oversight and Reporting**

The State will utilize the small portion of DSRIP funding allocated to the State Operations and Implementation to support robust operations, implementation, governance and oversight of the DSRIP program. These state expenditures associated with implementation of the DSRIP program will be claimed as administrative costs on the CMS 64. Appendix C provides additional detail on anticipated personnel, fringe and contractual costs.

### **6.1 Internal Operations and Implementation**

The State will use a robust internal implementation team to ensure the DSRIP program towards its goals as outlined in STC 60. The team will include, but not be limited to:

- ACO program and contract management team
- CP program and contract management team
- Statewide Investments program and contract management team
- MassHealth operations team

The State will develop an internal steering committee that will make recommendations to the Assistant Secretary for MassHealth on policy and programmatic decisions related to the DSRIP program. This steering committee will include representation from several MassHealth teams involved in the design and implementation of the DSRIP program.

Committee members will meet regularly and will solicit feedback from the DSRIP Advisory Committee on Quality and other stakeholders as needed. While the steering committee will provide timely information and consultation, ultimate decision-making power rests with the Assistant Secretary for MassHealth.

### **6.2 Advisory Functions**

#### **6.2.1 DSRIP Advisory Committee on Quality**

The State will establish a committee of stakeholders who will be responsible for supporting the clinical performance improvement cycle of DSRIP activities as set forth in STC 75.<sup>2</sup> The Committee will serve as an advisory group offering expertise in health care quality measures, clinical measurement, and clinical data used in performance improvement initiatives, quality and best practices. Final decision-making authority will be retained by the State and CMS, although all recommendations of the Committee will be considered by the State and CMS. The Committee will be made up of:

- Representatives from community health centers serving the Medicaid population
- Clinical experts in behavioral health, substance use disorder and long term services and supports. Clinical experts are physicians, physician assistants, nurse practitioners, licensed clinical social workers, licensed mental health counselors, psychologists, or registered nurses who satisfy two or more of the following criteria:

---

<sup>2</sup> Note STC 75 called the Committee the “DSRIP Advisory Committee.” State has decided to re-name it as the “DSRIP Advisory Committee on Quality” for clarification purposes.

- Five years of patient care in the relevant area of expertise
- Experience managing clinical programs focused on the relevant patient populations
- Service on national or statewide advisory committees or panels for relevant topic areas
- Advocacy members: consumers or consumer representatives, including at least one representative for people with disabilities and, separately, at least one representative for people with complex medical conditions

At least 30% of members must have significant expertise in clinical quality measurement of hospitals, primary care providers, community health centers, clinics and managed care plans. Significant expertise is defined as not less than five years of recent full time employment in quality measurement in government service, at managed care plans, at health systems, or from companies providing quality measurement services to above listed provider types and managed care plans.

To minimize risk of conflicts of interest, no more than three members may be directly employed by Massachusetts hospitals, MassHealth ACOs, or Community Partners. To further minimize conflicts of interest, no CEO, CFO, COO, or CMO of a Massachusetts hospital, MassHealth ACO, or Community Partners will be appointed to the Committee. Additionally, any members whose affiliated organizations have financial interests in performance target setting for quality measures must recuse themselves when the Committee is discussing performance target setting. Finally, potential conflicts of interest will be considered when selecting Committee members to try to minimize such conflicts.

### **6.2.2 Independent Assessor**

The State will identify an Independent Assessor with expertise in delivery system improvement to assist with DSRIP administration, oversight, and monitoring as set forth in STC 74. The Independent Assessor will provide an added, ongoing layer of review and monitoring. The State and the Independent Assessor will concurrently review ACOs', CPs', and CSAs' Full Participation Plans, Budgets, Budget Narratives, and Semi-Annual Progress Reports to ensure compliance with the STCs and DSRIP Protocol. Preliminary ACO and CP Participation Plans and the Budgets and Budget Narratives for the Preparation Budget Period will not be subject to review by the Independent Assessor. The Independent Assessor shall make recommendations to the State regarding approvals, denials or recommended changes to Participation Plans, Budgets, Budget Narratives, and Semi-Annual Progress Reports, but final decision-making authority regarding all approvals, denials or requests for modifications rests with the State. However, the State will carefully consider the Independent Assessor's recommendations. The State has the authority to change Independent Assessors at the State's discretion.

Additionally, the Independent Assessor shall perform a midpoint assessment, which will systematically assess the performance of key demonstration entities, including identification of specific challenges and actionable mitigation strategies for mid-course correction for the State's consideration. Specifically, the midpoint assessment will focus on ACO and CP implementation of their DSRIP Participation Plans, Budgets, and Budget Narratives, as well as key vendors procured by the State for the purposes of developing and implementing the Statewide Investments. The midpoint assessment report shall cover implementation activities from July 1, 2017 through December 31, 2019, and the midpoint assessment report will be submitted to CMS by the end of September 2020. Notwithstanding STC 74, in the event of a state of emergency declared by the federal or state government, the midpoint assessment due date shall be extended by at least two months, as mutually agreed upon by CMS and the State. The State may focus on issues identified in the midpoint assessment and may implement changes where necessary.

In contrast, the Independent Evaluator is charged with reviewing the DSRIP program as a whole (see Section 6.4). At the midpoint and conclusion of DSRIP, the Evaluator will undertake an interim and summative evaluation, respectively, which will seek to determine the effectiveness of the DSRIP program in relationship to its goals. To accomplish such reviews, the Evaluator will use a quantitative and qualitative approach. These reviews may include evaluating the work of the Independent Assessor.

## **6.3 Stakeholder Engagement**

### **6.3.1 Independent Consumer Support Program**

The State will create Independent Consumer Support Program to assist beneficiaries in understanding their coverage models and in the resolution of problems regarding services, coverage, access, and rights. The Independent Consumer Support Program will assist beneficiaries to navigate and access covered services in accordance with STC 65.

### **6.3.2 State Public Outreach for ACO Program**

The State aims to facilitate a seamless transition to the new care model for MCO and ACO enrollees and will do so through the State Public Outreach for ACO Program in accordance with STC 72.

### **6.3.3 State Reporting to External Stakeholders and Stakeholder Engagement**

The State will compile public-facing annual reports of ACO, CP, and statewide investments performance. The report will provide relevant information on the State's progress under the DSRIP program, as determined by the State. Annual public meetings will be held to engage stakeholders on the DSRIP program at large, and allow for discussion, comments, and questions. MassHealth will also post information related to the DSRIP program online. The public will be encouraged to contact MassHealth to provide comments and feedback throughout the Demonstration through a dedicated e-mail address.

## **6.4 Evaluation of the Demonstration**

The State will procure an Independent Evaluator to conduct interim and final evaluations of the DSRIP program per STC 73. The State may utilize the same Independent Evaluator for the Demonstration under STC 87 as it does for the DSRIP program under STC 73.

### **6.4.1 Requirements for Interim Evaluation**

The Independent Evaluator will conduct an interim evaluation of the DSRIP program, in accordance with STC 73(a). The interim evaluation will evaluate the program using quantitative and qualitative methods to determine whether the investments made through the DSRIP program are contributing to achieving the demonstration goals as described in STC 60. The Independent Evaluator may use the data and results from the midpoint assessment to inform the interim and final evaluations.

The DSRIP interim evaluation will cover the time period July 2017 to December 2020, and will be submitted to CMS by the end of June 2021. Notwithstanding STC 73, in the event of a state of emergency declared by the federal or state government, due dates for the interim evaluation report shall be extended by at least a month, as mutually agreed upon by CMS and the State. The DSRIP interim evaluation will be a separate section in the overall waiver interim evaluation. The State will provide the draft evaluation design of the overall waiver (including proposals for evaluation of the DSRIP program) to CMS by June 30, 2018.

### **6.4.2 Final Evaluation**

In contrast to the interim evaluation, the final evaluation will provide a summative overview of the DSRIP program over the five year demonstration period, and evaluate whether the investments made through the DSRIP program contributed to achieving the demonstration goals as described in STC 60. The Independent Evaluator will also be responsible for completing the final evaluation of the DSRIP program in accordance with STCs 73(b) and 88(f). The final evaluation of DSRIP will be a component of the Summative Evaluation submitted to CMS as per the timeline in STC 88(f).



## 6.5 CMS Oversight

### 6.5.1 State Reporting to CMS

The State will compile quarterly and annual reports to submit to CMS consistent with sections IX and X of the approved STCs as part of the broader 1115 demonstration reports. These reports will include an account of all DSRIP payments made in the quarter or year, respectively and include insights and updates from the progress reports collected from ACOs, CPs, and CSAs. The State and CMS will agree upon a reporting template for quarterly and annual reports by the start of the demonstration for the quarterly report and by December 2017 for the annual report. The State and CMS will also use a portion of the Monthly Monitoring Calls for March, June, September, and December of each year for an update and discussion of progress in meeting DSRIP goals, performance, challenges, mid-course corrections, successes, and evaluation.

### 6.5.2 Process for Review, Approval, and Modification of Protocol

The State will work collaboratively with CMS for the review and approval of the DSRIP Protocol. As set forth in STC 61(c), the State may modify the DSRIP Protocol over time, with CMS approval. Reasons for modification may include but are not limited to:

- State decision to change programmatic features that are codified in the Protocol (e.g. change the structure of the outcomes-based payment funding stream for CPs)
- State decision to modify State Accountability Targets during the demonstration period, if the targets are no longer appropriate, or that targets were greatly exceeded or underachieved

State will submit the modification request to CMS, which will have 90 calendar days to review and approve. If CMS does not approve the Protocol, the State and CMS will work collaboratively together to align on appropriate modifications and a timeline for prompt approval.



## Appendix A: Description of ACOs and CPs

### Accountable Care Organizations

To achieve Massachusetts' DSRIP goals as described above, the State is transitioning a significant portion of the delivery system from a fragmented, fee-for-service model to one where providers come together in new partnerships to take financial accountability for the cost and quality of care for populations of members. Massachusetts is launching a new Accountable Care Organization program, has designed three ACO payment models that respond to the diversity of the state's delivery system, and intends to select ACOs across all three models through a competitive procurement.

ACO contracts will have an initial term of five-years and will include significant requirements for ACOs to ensure care delivery in line with the state's delivery system goals, including but not limited to requirements to screen members and connect them to appropriate settings of care; requirements to proactively identify at-risk members, complete comprehensive assessments, and provide them with appropriate care management activities; and requirements to work with Community Partners to integrate behavioral health, LTSS, and medical care. Massachusetts' three ACO models are described in Section 1.

### Procurement Process

Massachusetts intends to select ACOs across all three ACO models as part of a single, competitive procurement. Bidders may bid on more than one model, but a bidder may be selected for, at maximum, one ACO model. The State may re-open the procurement at any time if, in the State's determination, the State has not received sufficient responses, or to otherwise meet the State's delivery system goals.

Bidders will submit responses to the State's procurement by the deadline, after which the responses will be evaluated by the State. The State will select successful ACO bidders to enter into contract negotiation. Through contract negotiation, the State intends to reach successful contract execution with a set of ACOs; although not all ACOs selected for negotiation may ultimately execute contracts with the State (e.g., if an ACO ultimately chooses not to accept final contract terms or rates). The graphic below shows an example process flow:

*Example process flow for procurement: for illustration purposes only:*



The State's current anticipated procurement timeline is as follows:

- Request for responses was posted in September 2016
- Bidders' responses are due mid-February 2017
- Target contract execution in August 2017
- Contracts will be effective the date they are executed, and will have an operational start date (i.e., the date on which members can enroll in ACOs) in December 2017

Further information on the ACO procurement can be found online at the State's public procurement website, [www.commbuys.com](http://www.commbuys.com).

## Community Partners

Community Partners will support members with complex BH and LTSS needs, in coordination with ACOs and other managed care entities, as determined by the State. The focus populations of MassHealth members for the CP program may include, for example, (1) members with diagnoses of serious mental illness and/or substance use disorder who have significant utilization of acute services such as ER visits, inpatient stays, detoxification stays, medication assisted treatment for SUD or co-occurring chronic medical conditions; and/or (2) members with claims for MassHealth State Plan LTSS of more than \$300 per month over at least 3 consecutive months.

MassHealth will selectively procure the following two types of CPs, BH CPs and LTSS CPs (see Sections 1 and 4.3 for additional descriptions of the CP Models).

- **BH CP Model overview:** MCOs and ACOs will delegate comprehensive care management responsibility to the BH CP for enrollees of the BH CP with Serious Mental Illness (SMI) and/or Substance Use Disorder (SUD). BH CPs will be required to coordinate care across the full healthcare continuum, including physical and behavioral health, LTSS and social service needs. Because BH CPs will be expected to have experience supporting members with LTSS needs, members with both complex BH and LTSS needs as assigned to a BH CP. BH CPs will be required to meet certain training obligations (e.g., training in person-centered planning, cultural competency, accessibility and accommodations, independent living and recovery principles, motivational interviewing, conflicts of interest and health and wellness principles) and coordination requirements (e.g., providing enrollees with at least two choices of LTSS service providers, assisting the member in navigating and accessing needed LTSS and LTSS-related services, identifying LTSS providers that serve or might serve the member, and coordinating and facilitate communication with LTSS providers) to ensure their capability to support members with both complex BH and LTSS needs.
- **LTSS CP Model overview:** ACOs and MCOs will conduct comprehensive assessments, convene the care teams, and provide care planning and coordination for physical and behavioral health services to enrollees assigned to a LTSS CP. The LTSS CP will review the comprehensive assessment results with the LTSS CP assigned members as part of the person-centered LTSS care planning process and will inform the member about his or her options for specific LTSS services, programs and providers that may meet the member's identified LTSS needs. The LTSS CP is expected to be an integral part of the member's care team, as requested by the member. LTSS CPs may also have the opportunity to participate in an enhanced supports model (anticipated to begin in year 2), where responsibility for the comprehensive assessment and care management will be delegated by the ACO/MCO to the LTSS CP.

CPs will not be able to authorize services for members under either model.

## Procurement Process

MassHealth intends to select BH and LTSS CPs across the State through a competitive procurement. ACOs (and other managed care entities as determined by the state) will be required to partner with CPs in all the regions or services areas in which the ACO operates.

Bidders will submit responses to the State's procurement by the deadline, after which the responses will be evaluated by the State. The State will consider any bid submitted by any entity that meets the minimum bidder qualifications of the procurement. The State will select successful CP bidders to enter into contract

negotiation. Through contract negotiation, the State intends to reach successful contract execution with a set of CPs; although not all CPs selected for negotiation may ultimately execute contracts with the State (e.g., if an CP ultimately chooses not to accept final contract terms or rates). The graphic below shows an example process flow:

*Example process flow for procurement: for illustration purposes only:*



The State’s current anticipated procurement timeline is as follows:

- Request for responses will be posted in February/March 2017
- CP responses are due end of May 2017
- Target contract execution in November 2017
- Contracting between CPs and ACOs & MCOs is targeted to be completed by January-February 2018
- CPs begin enrolling members in June 2018

Further information on the CP procurement can be found online at the State’s public procurement website, [www.commbuys.com](http://www.commbuys.com).

### **Relationships between ACOs and CPs**

Massachusetts has established a framework for ACOs and CPs to form and formalize their relationships. This framework is set forth in the model contracts for ACOs, and Massachusetts intends to similarly incorporate this framework in its model contracts for CPs. The framework delineates areas of delegated and shared responsibility between ACOs and CPs, as follows:

#### **Delegated responsibility to BH CPs**

ACOs must maintain agreements with BH CPs. These agreements will require the BH CP to support the ACO’s care coordination and care management responsibilities, including:

- Working together to improve coordination and integration of BH services and expertise into care, including activities such as but not limited to:
  - Identifying BH providers that serve or might serve enrollees, and coordinating between the ACO and those providers
  - Assisting the ACO’s members to navigate to and access BH and related services
  - Facilitating communication between members and providers

- Coordinating with staff in state agencies that are involved in member care
- Facilitating members' access to peer support services
- Working together to perform outreach and enrollment for members who are eligible for BH CPs
- Providing care management to BH CP-enrolled members, including designated care coordinators/clinical care managers, documented treatment plans, comprehensive transition management, health promotion, and other activities
- Collaborating and establishing mutual policies and procedures to ensure alignment, information sharing, appropriate sign-off, issue resolution, and communication
- Performance measurement and management, including the ACO and CP working together to evaluate performance on key process measures (e.g., outreach and enrollment) and outcome measures (e.g., the state's accountability score measures)

**Delegated responsibility to LTSS CPs**

ACOs must maintain agreements with LTSS CPs. These agreements will require the LTSS CP to support the ACO's care coordination and care management responsibilities, including:

- Working together to improve coordination and integration of LTSS and expertise into physical and behavioral health care, including activities such as but not limited to:
  - Identifying LTSS providers that serve or might serve enrollees, and coordinating between the ACO and those providers
  - Assisting the ACO's members to navigate to and access LTSS and related services
  - Facilitating communication between members and providers
  - Coordinating with staff in state agencies that are involved in member care
  - Providing support during transitions of care for the ACO's members
- Providing information and navigation to LTSS for the ACO's members
- Collaborating and establishing mutual policies and procedures to ensure alignment, information sharing, appropriate sign-off, issue resolution, and communication
- Performance measurement and management, including the ACO and CP working together to evaluate performance on key process measures (e.g., outreach and enrollment) and outcome measures (e.g., the state's accountability score measures)

Exhibit A1 below details the entities performing the comprehensive assessment, care planning and service authorization functions related to LTSS and the target populations for such functions.

**Exhibit A1: LTSS Comprehensive Assessment, Care Planning and Service Authorization**

Activity	Entity Performing Activity	Population
Care Needs Screening	ACO or MCO	ACO and MCO enrollees

<b>Comprehensive Assessment</b>	ACO or MCO	ACO and MCO enrollees assigned to a LTSS CP or with LTSS needs as specified by EOHHS
<b>LTSS segment of Care Planning</b>	ACO or MCO	ACO and MCO enrollees with LTSS needs as specified by EOHHS who are not assigned to LTSS CPs
	LTSS CP	ACO and MCO enrollees assigned to a LTSS CP
<b>Service Authorization</b>	<i>Before LTSS becomes covered services and included in TCOC:</i>	
	MassHealth	ACOs and MCOs enrollees, including LTSS CP engaged enrollees
	<i>After LTSS become covered services and are included in TCOC (~year 3):</i>	
	Accountable Care Partnership Plan	Accountable Care Partnership Plan enrollees, including LTSS CP engaged enrollees
	MCO	MCO-Administered ACO and MCO enrollees, including LTSS CP engaged enrollees
	MassHealth	Primary Care ACO enrollees, including LTSS CP engaged enrollees

**Shared responsibility between ACOs and CPs**

Agreements will codify responsibilities of ACOs and CPs and describe additional requirements, including:

- Member assignment to a CP (as applicable)
- Care team roles and participation
- Performance expectations and any associated financial arrangements (beyond DSRIP)
- Shared decision-making and governance
- IT systems and data exchange, including quality and cost reporting

Beyond delineation of roles and responsibilities, contracts between ACOs, CPs, and MCOs must include conflict resolution protocols to handle disputes between the relevant parties. As ACOs and MCOs will not be paying CPs for services provided, a substantial portion of disputes will likely center around member referrals and care plans. If the member believes that the care he or she is receiving is unacceptable, the member will have access to formal grievance processes through the ACO, MCO, and CP entities. Additionally, the member can contact MassHealth’s Ombudsman Patient Protection Program, which is established to explicitly help members work through such issues. Throughout Year 1, the State will monitor disputes as they arise, and at year conclusion, will determine if further conflict resolution protocols are needed.

## **Appendix B: Description of Statewide Investments Initiatives**

### **Student Loan Repayment**

The student loan repayment program will repay a portion of a student's loan in exchange for at least an 18 month commitment (or equivalent in part time service) to work as a (1) primary care provider at a community health center or (2) behavioral health professional (e.g., Community Health Worker (CHW), Peer Specialist, Recovery Support Specialist, or Licensed Clinical social worker) in a community setting (e.g., community health center, community mental health center) and/or at an Emergency Service Program (ESP), and/or at any entity participating in a CP or CSA. This program hopes to reduce the shortage of providers and incentivize them to remain in the field long-term. Additionally, increased numbers of providers available to ESPs will help support diversionary strategies to reduce Emergency Department utilization and increase appropriate member placement in other settings.

#### **Awardee's Obligations**

Awardees will be required to submit semiannual progress reports to the State that detail the impact of the student loan repayment program on their practice and institutions. Awardees' accountability will be ensured through primary care providers' and behavioral health professionals' attestations that they have remained in the required placement for a minimum of two years or the equivalent in part time service. If a provider fails to fulfill the minimum requirement, the State will determine the appropriate recourse, which may include recoupment of funds paid by the State for student loans.

#### **State Management**

The State will select the recipients of the awards, and will conduct robust monitoring and assessment of the semi-annual progress reports including reviewing the awardees' progress, successes, and challenges.

### **Primary Care Integration Models and Retention**

The State will implement a grant program that provides support for community health centers and community mental health centers, and/or any entity participating in a CP or CSA to allow their primary care and behavioral health providers to engage in one-year projects related to accountable care implementation, including improving care coordination and integrating primary care and behavioral health. These projects must support improvements in cost, quality and patient experience through accountable care frameworks and will also serve as an opportunity to increase retention of providers. Community health centers, community mental health centers, and/or entities participating in a CP or CSA will be the primary applicant and will partner with primary care and behavioral health providers to apply for this funding.

#### **Awardee's Obligations**

Awardees will be required to submit semiannual progress reports to the State that detail the project's progress towards goals and pre-approved accountability measures, challenges and plans to address those challenges, and expenditures to date.

#### **State's Management**

The State will select the recipients of this funding, and will conduct robust monitoring and assessment of the semiannual progress reports by reviewing progress, successes, challenges, and accountability measures. Awardees' accountability will be evaluated by whether the projects were completed and whether performance on the accountability metrics, set out prior to the project's implementation, was adequate. If the project was not completed, or performance on the metrics was inadequate, the State, in consultation with the awardee, will determine appropriate recourse, which may include corrective action plans, termination from the investment program, barring providers from applying for future Statewide Investment funding, recoupment of funds, or other contract management activities (e.g., working collaboratively with the awardee to identify and implement new strategies to meet the project goals, or renegotiating the awardee's responsibilities or the project's goals to achieve partial success, as appropriate).

## **Investment in Primary Care Residency Training**

In order to increase the number of physicians receiving residency training in community health centers, the State will use DSRIP funding to help offset the costs of community health center and community mental health center residency slots for both community health centers, community mental health centers, and hospitals. Community health centers, community mental health centers, and hospitals will be eligible to apply for this funding.

### **Awardee's Obligations**

Awardees will be required to submit semiannual progress reports to the State that detail the project's progress towards goals and pre-approved accountability measures (e.g., the number of providers remaining in the CHC for the length of the residency program), challenges and plans to address those challenges, and expenditures to date.

### **State's Management**

The State will select the recipients of this award, and will conduct robust monitoring and assessment of the semiannual progress reports through reviewing progress, successes, challenges, and accountability measures.

## **Workforce Development Grant Program**

The State's payment reform initiatives will introduce new demands and shifting responsibilities for the healthcare workforce. The State will use DSRIP funding to support a wide spectrum of health care workforce development and training to allow for providers to more effectively operate in a new health care system. Entities participating in payment reform (ACOs, Community Partners, and CSAs), or entities in support of ACOs, CPs, and CSAs (e.g. training programs) are eligible to apply for funding.

### **Awardee's Obligations**

Awardees will be required to submit semiannual progress reports to the State discussing the project's progress towards goals and pre-approved accountability measures, challenges and plans to address those challenges, and expenditures to date.

### **State's Management**

State will select the awardees, and will conduct robust monitoring and assessment of the semiannual progress reports through reviewing progress, successes, challenges, and accountability measures. Awardees' accountability will be evaluated by whether the projects were completed, and whether performance on the accountability metrics, set out prior to the project's implementation, was adequate. If the project was not completed, or performance on the metrics was inadequate, the State, in consultation with the awardee, will determine appropriate recourse, which may include corrective action plans, termination from the investment program, barring providers from applying for future Statewide Investment funding, recoupment of funds, or other contract management activities (e.g., collaboratively with the awardee to identify and implement new strategies to meet the project goals, or renegotiating the awardee's responsibilities or the project's goals to achieve partial success, as appropriate).

## **Technical Assistance**

The State will procure vendors to provide technical assistance (TA) to ACOs, CPs and CSAs in a range of knowledge domains in order to help with the implementation of evidence-based interventions. TA may be provided in multiple forms, including but not limited to: individual consultation, learning collaboratives, tools and resources, and webinars. Providers participating in payment reform (ACOs, Community Partners, and CSAs) may be eligible to apply for funding.

Technical assistance may be available in areas such as, but not limited to:



- (1) **Education:** Education on delivery system reform topics, such as governance requirements, shared savings and shared losses; network development; quality and financial management analytics; assistance with health care literacy; and other topics.
- (2) **Actuarial and Financial:** Actuarial consulting to support participation in payment models. Baseline education and readiness assessments that address financial business process changes, patient attribution, budgeting, practice management systems, and other needs.
- (3) **Care Coordination/Integration:** Technical assistance to support, establish, and improve care coordination/integration best practices, including best practices around incorporating community health workers and social workers into practice, among other areas
- (4) **Performance Management:** Technical assistance to support program improvements, project management and provider performance management
- (5) **Health Information Technology:** Consultations to provide insight into what HIT investments and workflow adjustments will be needed to achieve goals regarding data sharing and integration across the delivery system (e.g., establishing clinical or community linkages through an e-Referral system)
- (6) **Accessible and Culturally Competent Care:** Training and support materials to promote best practices for accessibility and for culturally competent care for individuals with limited English proficiency; diverse cultural and ethnic backgrounds; physical, developmental, or mental disabilities; and regardless of gender, sexual orientation, or gender identity.
- (7) **Chronic Conditions Management:** Training, support, and technical assistance on utilizing and implementing evidence-based interventions to manage chronic conditions, among other areas.
- (8) **Behavioral Health Care Treatment and Management:** Training, support, data analytics, and technical assistance in caring for patients with behavioral health needs in the community, among other areas
- (9) **Population Health and Data Analytics:** Training, support, and technical assistance in analyzing data (e.g. raw claims extracts from The State, clinical quality data from EHRs) to help providers make evidence-based decisions, among other items

#### Awardee's Obligations

ACOs, CPs, and CSAs will be eligible to apply for technical assistance. Interested ACOs, CPs, and CSAs will submit a comprehensive TA plan as part of their application, which will be subject to modification and approval by the State. Any TA resources to support the plan must not overlap with TA supported through other funding sources (e.g., federal, state, private sector). Awardees will be required to submit a semiannual progress report discussing the progress towards goals and pre-approved accountability measures, challenges and plans to address those challenges, and expenditures to date.

#### Vendor's Obligations

Vendors will work in collaboration with the State, ACOs, CPs, and CSAs to provide TA in a way that optimizes allocated TA resources and supports sustainable TA infrastructure. Vendors will also be required to submit documentation covering the same topics discussed in the awardees' semiannual progress report.

#### State's Management

The State will procure qualified vendor(s) for each TA category. A vendor may be approved for multiple categories. To be considered a qualified vendor, the vendor must demonstrate expertise and capacity for the categories for which it is applying, as well as meet other eligibility criteria set by the State.

The State will conduct robust monitoring and assessment of progress reports submitted by the awardees and TA vendors, which will include reviewing progress, successes, challenges, and accountability measures. Awardee and TA vendor accountability will be based on meeting pre-determined accountability measures, which will focus on whether the awardee was able to meet its technical assistance goals, or whether the vendor provided appropriate TA. If the goals are not met, or performance is inadequate, the State, in consultation with the awardee and/or vendor, will determine appropriate recourse, which may include corrective action plans, termination from the investment program, barring providers from applying for future Statewide Investment funding, recoupment of funds, or other contract management activities (e.g., working collaboratively with the awardee to identify and implement new strategies to meet the project goals, or renegotiating the awardee's responsibilities or the project's goals to achieve partial success, as appropriate).

### **Alternative Payment Methods (APM) Preparation Fund**

The State will use DSRIP funding for an Alternative Payment Methods (APM) Preparation Fund, which will offer up to two years of support to providers that are not yet ready to participate in an APM, but want to take steps towards APM adoption. Funds can be used to develop, expand, or enhance shared governance structures and organizational integration strategies linking providers across the continuum of care. Massachusetts' providers seeking to move towards ACOs or APMs but that are not participating as a MassHealth ACO; and behavioral health providers, BH CPs, LTSS providers and LTSS CPs seeking to enter into APM arrangements with MassHealth managed care entities will be eligible to apply for funding. Funds may also be used to raise awareness about APM among providers not yet engaged in a MassHealth ACO, CP, or CSA.

#### **Awardee's Obligations**

Awardees will be required to submit semiannual progress reports to the State discussing the project's progress towards goals and pre-approved accountability measures, challenges and plans to address those challenges, and expenditures to date.

#### **State's Management**

The State will select recipients of this funding, and conduct robust monitoring and assessment of the semiannual progress reports through reviewing progress, successes, challenges, and accountability measures. Awardees' accountability will be evaluated by whether the projects were completed, and whether performance on the accountability metrics, set out prior to the project's implementation, was adequate. If the project was not completed, or performance on the metrics was inadequate, the State, in consultation with the awardee, will determine appropriate recourse, which may include corrective action plans, termination from the investment program, barring providers from applying for future Statewide Investment funding, recoupment of funds, or other contract management activities (e.g., working collaboratively with the awardee to identify and implement new strategies to meet the project goals, or renegotiating the awardee's responsibilities or the project's goals to achieve partial success, as appropriate).

### **Enhanced Diversionary Behavioral Health Activities**

The State will use DSRIP funding to support investment in new or enhanced diversionary strategies or infrastructure to help place members with behavioral health needs in the least restrictive, clinically most appropriate settings and to reduce the incidence of members who are boarded in a hospital emergency department waiting for admission into acute inpatient treatment or diversion to a community setting. Strategies for investment may include:

- Workforce Development
- Urgent care and intensive outpatient program (IOP)
- Community-Based Acute Treatment (CBAT) for adults

- ESP/Mobile Crisis Intervention (MCI) Teams with specific focus on placement in the EDs
- Crisis Stabilization Services (CSS)
- Telemedicine and Tele-psychiatry
- Peer Support models
- Discharge navigation services
- Web-based portal for navigation and data collection of ED boarding and available bed placement
- Care coordination software to better manage members who are boarded in the ED and to prevent such events

ACOs, CPs, CSAs, primary care providers, ESPs, community mental health centers, acute care hospitals, community health centers, psychiatric hospitals, advocacy organizations, provider organizations, vendors, and MCOs may be eligible to apply for funding. ACOs, CPs, or CSAs receiving funding must demonstrate that activities supported through this statewide investment are not duplicative with activities supported through other available funding.

#### Awardee's Obligations

Awardees will submit a semiannual progress report discussing the project's progress to date including activities and progress towards the reduction of ED boarding, goals and accountability measures, challenges and plans to address those challenges, and expenditures to date.

#### State's Management

The State will select recipients for this funding, and conduct robust monitoring and assessment of the semiannual progress and annual reports. Awardees' accountability will be evaluated by whether the projects were completed, and whether performance on the accountability metrics, set out prior to the project's implementation, was adequate. If the project was not completed, or performance on the metrics was inadequate, the State, in consultation with the awardee, will determine appropriate recourse, which may include corrective action plans, termination from the investment program, barring providers from applying for future Statewide Investment funding, recoupment of funds, or other contract management activities (e.g., working collaboratively with the awardee to identify and implement new strategies to meet the project goals, or renegotiating the awardee's responsibilities or the project's goals to achieve partial success, as appropriate).

### **Improved accessibility for people with disabilities or for whom English is not a primary language**

The State will use DSRIP funding to help providers offer necessary equipment and expertise at their facilities to meet the needs of persons with disabilities, or of those for whom English is not a primary language.

Funding would be available to help providers purchase items necessary to increase accessibility for members with disabilities, for accessible communication assistance, and for development of educational materials for providers regarding accessibility for members with disabilities. The State will tailor some of these materials specifically for providers treating members who are vision-impaired, deaf and hard of hearing, or for whom English is not a primary language. Applicants will be required to demonstrate that training is not duplicative of that received under the Technical Assistance statewide investments funding stream.

The State may also utilize this funding to support development of directories or other resources to assist MassHealth members find MassHealth providers by preferred accessibility preferences and to assist providers in identifying the accessibility preferences of their patients.

#### Awardee's Obligations

Awardees will be required to submit semiannual progress reports to the State discussing the project's progress towards goals and pre-approved accountability measures, challenges and plans to address those challenges, and expenditures to date.

#### State's Management

The State will select funding recipients, and conduct robust monitoring and assessment of the semiannual progress reports through reviewing progress, successes, challenges, and accountability measures. Awardees' accountability will be evaluated by whether the projects were completed, and whether performance on the accountability metrics, set out prior to the project's implementation, was adequate. If the project was not completed, or performance on the metrics was inadequate, the State, in consultation with the awardee, will determine appropriate recourse, which may include corrective action plans, termination from the investment program, barring providers from applying for future Statewide Investment funding, recoupment of funds, or other contract management activities (e.g., working collaboratively with the awardee to identify and implement new strategies to meet the project goals, or renegotiating the awardee's responsibilities or the project's goals to achieve partial success, as appropriate).

## Appendix C: Example Calculation of State DSRIP Accountability Score by Accountability Domain for BP 4

The following example demonstrates how the State DSRIP Accountability Score will be calculated for Budget Period 4. There are five steps to calculate how much at-risk funding the State earns in a given BP:

- **Step 1:** Calculate the MassHealth ACO/APM Adoption Rate Score
- **Step 2:** Calculate the Reduction in Spending Growth Score
- **Step 3:** Calculate the Overall Statewide Quality Performance Score
- **Step 4:** Using the three scores calculated in Steps 1 through 3 to calculate the State DSRIP Accountability Score
- **Step 5:** Use the State DSRIP Accountability Score to determine earned at-risk funds

### Step 1: Calculate the MassHealth ACO/APM Adoption Rate Score for BP 4

For the ACO/APM Adoption Rate score, the State will earn a 100% score for a given Budget Period if the State meets or surpasses the target for that Budget Period. If the State does not meet the target, then it will earn a 0% score for that Budget Period.

For BP 4, the State must have at least 40% of MassHealth ACO-eligible members who are enrolled in or attributed to ACOs or who receive services from providers paid under APMs, as shown below:

**EXHIBIT A2 – Target ACO/APM Adoption Rates, BP 4**

Target ACO/APM Adoption Rates						
DSRIP Budget Period	Prep Budget	BP 1	BP 2	BP 3	BP 4	BP 5
% of MassHealth ACO-Eligible Lives Served by ACOs/ Covered by APMS	NA	25%	30%	35%	40%	45%

For the purpose of this example, assume that the State has a 42% ACO/APM adoption rate in BP 4. Therefore, the State receives an accountability domain score of **100%** in this category.

### Step 2: Calculate the Reduction in Spending Growth Score for BP 4

In accordance with STC 71(f), the State will calculate its performance on reduction in state spending growth compared to the trended PMPM, and the domain score will be determined according to a gap-to-goal methodology for each budget period in accordance with STC 71(g), as follows:

- If Actual Reduction < (50% \* Reduction Target), then Measure Score = 0%
- If Actual Reduction ≥ (Reduction Target), then Measure Score = 100%
- If Actual Reduction ≥ (50% \* Reduction Target) AND < (Reduction Target), then Measure Score is equal to: (Actual Reduction - (50% \* Reduction Target)) / (Reduction Target - (50% \* Reduction Target)) OR the simplified version,

$$\frac{\text{Percent of reduction target achieved} - 50\%}{100\% - 50\%}$$

For BP 4, the Reduction Target is 1.1% off of trended PMPM, as shown in below.

**EXHIBIT A3 – Reduction Targets for ACO-Enrolled PMPMs, BP 4**

Reduction Targets for ACO-Enrolled PMPMs						
DSRIP Budget Period	Prep Budget	BP 1	BP 2	BP 3	BP 4	BP 5
% Reduction Target in ACO-enrolled PMPM vs. trended PMPM	NA	NA	NA	0.25% off of trended PMPM	<b>1.1% off of trended PMPM</b>	2.1% off of trended PMPM

For the purpose of this example, assume that the State’s Actual Reduction is 0.9% in BP 4, which is roughly 82% of the Reduction Target, as show below:

$$\text{Percent of reduction target achieved} = \frac{0.9\%}{1.1\%} \approx 82\%$$

Thus, to calculate this State accountability domain score:

$$\frac{82\% - 50\%}{100\% - 50\%} = 64\%$$

Therefore, the State receives an accountability domain score of **64%** in this category.

**Step 3: Calculate the Overall Statewide Quality Performance for BP 4**

In accordance with STC 71, the State will annually calculate the State performance score for each quality domain by aggregating the performance scores of all ACOs. Weighting varies by Budget Period, as shown below:

**EXHIBIT A4 – State Quality Domain Weights**

State Quality Domain Weights				
Quality Domain		Domain Weight: BP 1	Domain Weight: BP 2	Domain Weight: BP 3-5
<i>Clinical Quality Measures</i>				
1	Prevention & Wellness	N/A	85%	45%
2	Care Integration		N/A	40%
<i>Patient Experience Surveys</i>				
3	Overall Rating and Care Delivery	N/A	15%	7.5%

4	Person-centered Integrated Care	N/A	N/A	7.5%
---	---------------------------------	-----	-----	------

**STEP 3(a): Scoring for all Domains**

For all domains, domain scores for BP4 are calculated using the following steps:

- Calculate the aggregate domain scores for BP 1-3
- Calculate the pooled aggregate domain scores across the three Budget Periods
- Calculate the aggregate domain scores for BP 4 (our example year) and utilize Wilcoxon-rank sum tests to compare pooled aggregate domain scores from BP 1-3 against the BP4 aggregate domain scores

Domain scores are calculated using Achievement Points and do not include Improvement Points. Calculations for other Budget Periods would follow a similar methodology.

**1. Calculate the aggregate domain scores for BP 1-3**

Assume there are two ACOs (ACO 1 and ACO 2). Assuming ACO 1 receives a score of 30% and ACO 2 receives a score of 40% in the Prevention and Wellness domain for BP 1, the aggregate domain score for BP1 is the median of these two scores, or 35%. This step is repeated for all quality domains in BP 1-3 (see Exhibit A5 for detail).

**2. Calculate the pooled aggregate domain scores for BP 1-3**

The pooled aggregate domain score is then calculated by determining the median value of all scores within the Budget Periods. Assume ACO 1, ACO 2, and ACO 3 demonstrates the following scores in the Prevention and Wellness domain across BP1-3:

ACO 1			ACO 2			ACO 3		
BP1	BP2	BP3	BP1	BP2	BP3	BP1	BP2	BP3
30%	40%	50%	33%	41%	52%	31%	39%	49%

Redistributed from lowest to highest the domain scores appear as:

30%	31%	33%	39%	40%	41%	49%	50%	52%
-----	-----	-----	-----	-----	-----	-----	-----	-----

As the median score from a distribution is the middle score, then the pooled aggregate domain score across BP1-3 = 40.0%.

**EXHIBIT A5 – ACO Aggregate and Pooled Aggregate Domain Scores, BP 1-3**

Budget Period	BP 1			BP 2			BP 3			BP 1-3
	ACO 1	ACO 2	ACO 3	ACO 1	ACO 2	ACO 3	ACO 1	ACO 2	ACO 3	Total
<b>DSRIP Quality Domains</b>	<b>Domain Scores</b>			<b>Domain Scores</b>			<b>Domain Scores</b>			<b>Aggregate Domain Score</b>
Prevention & Wellness	30%	33%	31%	40%	41%	39%	50%	52%	49%	<b>40.0%</b>



Care Integration	60%	50%	53.3%	70%	50%	63.3%	80%	70%	73.3%	<b>63.3%</b>
PES: Overall Rating and Care Delivery	60%	60%	60%	50%	60%	56.7%	60%	70%	66.7%	<b>60.0%</b>
PES: Person-centered Integrated Care	60%	60%	60%	50%	50%	50%	70%	70%	70%	<b>60.0%</b>

**3. Calculate the aggregate domain scores for BP 4 and run Wilcoxon rank-sum test**

After calculating the BP4 aggregate domain scores using the same method utilized to calculate BP 1-3 domain scores (see above), the State will run a two-tailed, unmatched, Wilcoxon rank-sum test (hereinafter “Wilcoxon test”) to compare each aggregate domain score from BP 4 against its associated pooled aggregate domain score from BP 1-3. The p-value from this test will indicate whether in BP4 the quality domain score is better and statistically significant ( $p < 0.05$ , receives 100% score), worse and statistically significant ( $p < 0.05$ , receives 0% score) or not statistically different ( $p \geq 0.05$ , receives 100% score) from BP 1-3.

**EXHIBIT A6 – Wilcoxon testing of BP 4 Aggregate Domain Scores vs BP 1-2 Pooled Aggregate Domain Scores**

Budget Period	BP 1-2	BP 4				Wilcoxon test comparing BP4 aggregate domain scores vs. pooled aggregate BP 1-2 domain scores		
		ACO 1	ACO 2	ACO 3	Total (BP 4)			
Domains	Pooled Domain Score (BP 1-2)	Domain Scores			Aggregate Domain Score	Result	DSRIP Domain Score	Weight
Prevention & Wellness	40%	60%	70%	75%	70%	<b>Better and Statistically Significant</b>	<b>100%</b>	45%
Care Integration	63.3%	60%	66.7%	70%	66.7%	<b>Not Statistically Different</b>	<b>100%</b>	40%
PES: Overall Rating and Care Delivery	60%	50%	53.3%	60%	53.3%	<b>Worse and Statistically Significant</b>	<b>0%</b>	7.5%
PES: Person-centered Integrated Care	60%	50%	50%	50%	50.0%	<b>Worse and Statistically Significant</b>	<b>0%</b>	7.5%

BP3 domain scores are excluded from the pooled domain score based on concerns about the validity of domain scores in BP3 due to a state of emergency declared by the federal or state government.

**STEP 3(b): Calculating the Overall Statewide Quality Performance**

To calculate the overall Statewide Quality performance, we multiply the domain scores from BP 4 and the weights from BP 4 and obtain the sum:

**EXHIBIT A7 – Calculating the Statewide Quality Score for BP 4**

Domain	BP 4 DSRIP Domain Score	BP 4 DSRIP Domain Weight	Product
Prevention & Wellness	100%	45%	45%
Care Integration	100%	40%	40%
PES: Overall Rating and Care Delivery	0%	7.5%	0%
PES: Person-centered Integrated Care	0%	7.5%	0%
<b>Overall Statewide Quality Performance (sum of the products) =</b>			<b>85%</b>

#### Step 4: Calculate the Overall State DSRIP Accountability Score for BP 4

The State will calculate the State DSRIP Accountability Score by multiplying the Score for each State DSRIP Accountability domain by the associated weight and then summing the totals together.

For this example, the State achieved the following domain scores in BP 4:

- MassHealth ACO/APM Adoption Rate: **100%**
- Reduction in State Spending Growth: **64%**
- ACO Quality Performance: **85%**

Thus, the State DSRIP Accountability Score for BP 4 is **82.75%**, as demonstrated in the table below:

#### EXHIBIT A8 – Calculating the Overall State DSRIP Accountability Score

Example Calculation of State DSRIP Accountability Score for BP 4				
DSRIP Accountability Domain	Domain Weight	State Domain Score	State Accountability Calculations	DSRIP Score
MassHealth ACO/APM Adoption Rate	20%	100%	20% x 100% =	20%
Reduction in State Spending Growth	25%	64%	25% x 64% =	16%
ACO Quality Performance	55%	85%	55% x 85% =	46.75%
<b>State DSRIP Accountability Score =</b>				<b>82.75%</b>

#### Step 5: Determine At-Risk Funds Lost and Earned for BP 4

As noted above, the amount of at-risk State expenditure authority varies by Budget Period. For Budget Period 4, the amount at-risk is \$41.25M.

#### EXHIBIT A9 – Percent of State DSRIP Expenditure Authority At-Risk, BP 4

Percent of State DSRIP Expenditure Authority At-Risk					
DSRIP Budget Period	Prep BP and BP 1	BP 2	BP 3	BP 4	BP 5
DSRIP Expenditure Authority	\$637.5M	\$412.5M	\$362.5M	\$275M	\$112.5M

% of Expenditure Authority At-Risk	0%	5%	10%	15%	20%
Actual Expenditure Authority At-Risk*	\$0M	\$20.625M	\$36.25M	<b>\$41.25M</b>	\$22.5M

To calculate how much at-risk funding the State has earned for BP 4:

$$\begin{aligned}
 &BP\ 4\ amount\ at-risk \times BP\ 4\ State\ DSRIP\ Accountability\ Score \\
 &\$41.25M \times 82.75\% = \$34.13M
 \end{aligned}$$

To calculate how much at-risk funding the State has lost for BP 4:

$$\begin{aligned}
 &BP\ 4\ amount\ at-risk - BP\ 4\ at-risk\ funding\ earned \\
 &\$41.25M - \$34.13M = \$7.12M
 \end{aligned}$$

Therefore, the State earned \$34.13M and lost \$7.12M of the \$41.25M at-risk in Budget Period 4.

## Appendix D: Measure Tables

### ACO Measure Slate

Note: Where applicable, columns 2019 (Domain 3) and 2020 (Domains 1 and 2) indicate the performance period (e.g., “P (18/19/20)”, “P (19/20)”) from which data, as decided by the State, may be substituted for PY2020 performance rates due to the state of emergency declared by the federal or state government.

#	Measure Name	Measure Description	Data Source	Measure Payment Status (P = Performance, R=Reporting Only; P4R = Pay for Reporting)				
				2018	2019	2020	2021	2022
<b>Domain 1 – Prevention &amp; Wellness</b>								
1	Childhood Immunization Status	Percentage of members who received all recommended immunizations by their 2nd birthday	Hybrid	P4R	P	P (19/20)	P	P
2	Immunizations for Adolescents	Percentage of members 13 years of age who received all recommended vaccines, including the HPV series	Hybrid	P4R	P	P (19/20)	P	P
3	Timeliness of Prenatal Care	Percentage of deliveries in which the member received a prenatal care visit in the first trimester or within 42 days of enrollment	Hybrid	P4R	P	P (19/20)	P	P
4	Controlling High Blood Pressure	Percentage of members 18 to 64 years of age with hypertension and whose blood pressure was adequately controlled	Hybrid	P4R	R	P (19/20)	P	P
5	Comprehensive Diabetes Care: A1c Poor Control	Percentage of members 18 to 64 years of age with diabetes whose most recent HbA1c level demonstrated poor control (> 9.0%)	Hybrid	P4R	P	P (19/20)	P	P
6	Asthma Medication Ratio	Percentage of members 5 to 64 years of age who were identified as having persistent asthma and had a ratio of controller medications to total asthma medications of 0.50 or greater	Admin	R	P	P (19/20)	P	P
7	Metabolic Monitoring for Children and Adolescents on Antipsychotics	Percentage of members 1 to 17 years of age who had two or more antipsychotic prescriptions and received metabolic testing	Admin	R	P	P (19/20)	P	P
8	Follow-Up After Hospitalization for Mental Illness (7 days)	Percentage of discharges for members 6 to 64 years of age, hospitalized for mental illness, where the member received follow-up with a mental health practitioner within 7 days of discharge	Admin	R	P	P (19/20)	P	P

9	Initiation and Engagement of Alcohol, or Other Drug Abuse or Dependence Treatment**	Percentage of members 13 to 64 years of age who are diagnosed with a new episode of alcohol, opioid, or other drug abuse or dependency who initiate treatment within 14 days of diagnosis and who receive at ≥2 additional services within 30 days of the initiation visit	Admin	R	P	P (19/20)	P	P
<b>Domain 2 – Care Integration</b>								
10	Oral Health Evaluation	Percentage of members under age 21 years who received a comprehensive or periodic oral evaluation during the year	Admin	R	R	R	P	P
11	Screening for Depression and Follow Up Plan	Percentage of members 12 to 64 years screened for depression on the date of the encounter using an age appropriate standardized depression screening tool AND if positive, a follow-up plan is documented on the date of the positive screen	Hybrid	P4R	R	R	R	P
12	Depression Remission or Response	Percentage of members 12 to 64 years of age with a diagnosis of depression and elevated PHQ-9 score, who received follow-up evaluation with PHQ-9 and experienced response or remission in 4 to 8 months following the elevated score	Hybrid	P4R	R	R	P	P
13	ED Visits for Individuals with Mental Illness, Addiction, or Co-occurring Conditions	Number of ED visits for members 18 to 64 years of age identified with a diagnosis of serious mental illness, substance addiction, or co-occurring conditions	Admin	R	R	R	P	P
14	Follow-Up After Emergency Department Visit for Mental Illness (7 days)	Percentage of ED visits for members 6 to 64 years of age with a principal diagnosis of mental illness, where the member received follow-up care within 7 days of ED discharge	Admin	R	R	P (19/20)	P	P
15	Hospital Readmissions (Adult)	Case-mix adjusted rate of acute unplanned hospital readmissions within 30 days of discharge for members 18 to 64 years of age	Admin	R	R	R	P	P
16	Health-Related Social Needs Screening	Percentage of members who were screened for health-related social needs in the measurement year	Hybrid	P4R	R	R	P	P
17	Behavioral Health Community Partner Engagement **	Percentage of members 18 to 64 years of age who engaged with a BH Community Partner and received a treatment plan within 3 months (122 days) of Community Partner assignment	Admin	R	R	R	P	P
18	Long-Term Services and Supports Community Partner Engagement**	Percentage of members 3 to 64 years of age who engaged with an LTSS Community Partner and received a care plan within 3 months (122 days) of Community Partner assignment	Admin	R	R	R	P	P
19	Community Tenure**	The percentage of eligible days that ACO members 18-64 with bipolar disorder, schizophrenia, or psychosis (BSP) diagnoses, and separately, for other members 18-64 who have at least 3 consecutive months of LTSS utilization reside in their home or in a	Admin	R	R	R	P	P

		community setting without utilizing acute, chronic, or post-acute institutional health care services during the measurement year.							
<b>Domain 3 – Patient Experience: Overall Rating and Care Delivery</b>									
21	Overall Rating and Care Delivery**	Composite Related to Communications and Willingness to Recommend (To be finalized)	Survey	R	18/19/20	P (18/19/20)	P	P	
<b>Domain 4 – Patient Experience: Person-Centered Integrated Care</b>									
22	Person-centered Integrated Care**	Composites Related to Care Planning, Self-Management and Integration of Care (To be finalized)	Survey	R	R	R	P	P	

\*Note: The Acute Unplanned Admissions for Individuals with Diabetes measure and corresponding number (#20) were removed from the measure slate.

\*\* Composite measures

**MassHealth DSRIP BH Community Partners Quality Measure Program (Prospective Measures, 2018-2022) – Include Benchmark Timeline**

*Note: Where applicable, Column 2020 indicates the performance period (i.e., “P (19/20)”) from which data, as decided by the State, may be substituted for PY2020 performance rates due to the state of emergency declared by the federal or state government.*

#	Measure Name	Measure Description	Data Source	Benchmark due to CMS	Measure Steward	NQF	Pay for Performance Phase In (P= Performance, R= Reporting)				
							2018	2019	2020	2021	2022
<b>Domain 1: Care Integration</b>											
1	Community Partner Engagement**	Percentage of assigned enrollees 18 to 64 years of age with documentation of engagement within 122 days of the date of assignment to a Community Partner	Admin	Q4 2021	MA EOHHS	N/A	R	R	P (19/20)	P	P
2	Annual Treatment Plan Completion**	Percentage of enrollees 18 to 64 years of age with documentation of a completed Treatment Plan during the measurement year	Admin	Q4 2021	MA EOHHS	N/A	R	P4R	P (19/20)	--	--
2*	Enhanced Person-Centered Care Planning	Percentage of enrollees 18 to 64 years of age with timely completion of a new or	Admin	Q4 2021	MA EOHHS	N/A	--	--	R	P	P

		updated Treatment Plan during the measurement year									
3	Follow-up with BH CP after acute or post-acute stay (3 days)	Percentage of discharges from acute or post-acute stays for enrollees 18 to 64 years of age that were succeeded by a follow-up with a BH CP within 3 business days of discharge	Admin	Q2 2021	MA EOHHS	N/A	R	R	R	P	P
4	Follow-up with BH CP after ED visit	Percentage of ED visits for enrollees 18 to 64 years of age that had a follow-up visit within 7 days of the ED visit	Admin	Q2 2021	MA EOHHS	N/A	R	R	R	P	P
<b>Domain 2: Population Health</b>											
5	Annual primary care visit	Percentage of enrollees 18 to 64 years of age who had at least one comprehensive well-care visit during the measurement year	Admin	Q4 2021	MA EOHHS	N/A	R	R	P (19/20)	P	P
7	Initiation and Engagement of Alcohol, or Other Drug Abuse or Dependence Treatment**	Percentage of members 13 to 64 years of age who are diagnosed with a new episode of alcohol, opioid, or other drug abuse or dependency who initiate treatment within 14 days of diagnosis and who receive at ≥2 additional services within 30 days of the initiation visit	Admin	Q2 2021	NCQA	4	R	R	P (19/20)	P	P
9	Follow-Up After Hospitalization for Mental Illness (7 days)	Percentage of discharges for enrollees 18 to 64 years of age, hospitalized for treatment of mental illness, where the member received follow-up with a mental health practitioner within 7 days of discharge	Admin	Q4 2021	NCQA	576	R	R	P (19/20)	P	P
10	Diabetes Screening for Individuals With Schizophrenia or Bipolar Disorder Who Are Using Antipsychotic Medication	Percentage of enrollees with schizophrenia or bipolar disorder, who were dispensed an antipsychotic medication, and had diabetes screening test during the measurement year	Admin	Q4 2021	NCQA	1932	R	R	P (19/20)	P	P



11	Antidepressant Medication Management	Percentage of members (18-64) treated with antidepressant and had diagnosis of major depression who remained on antidepressant medication treatment	Admin	Q4 2021	NCQA	N/A	N/A	N/A	R	P	P
<b>Domain 3: Avoidable Utilization</b>											
12	ED Visits for Adults with SMI, Addiction, or Co-occurring Conditions	The rate of ED visits for enrollees 18 to 64 years of age identified with a diagnosis of serious mental illness, substance addiction, or co-occurring conditions	Admin	Q4 2021	MA EOHHS	N/A	R	R	P (19/20)	P	P
13	Hospital Readmissions (Adult)	The rate of acute unplanned hospital readmissions within 30 days of discharge for enrollees 18 to 64 years of age	Admin	Q4 2021	NCQA	1768	R	R	P (19/20)	P	P
<b>Domain 4: Member Experience</b>											
	Member Experience**	Composites Related to Member Engagement, Care Planning, and Community Tenure	Survey	Q4 2021	n/a	n/a	R	R	R	P	P

\*Note: The Community Tenure measure and corresponding number (#6) were removed from the measure slate.

\*\* Composite measures

Measure Steward Definitions

- MA EOHHS: Massachusetts Executive Office of Health and Human Services
- NCQA: National Committee for Quality Assurance

**MassHealth DSRIP LTSS Community Partners Quality Measure Program (Prospective Measures, 2018-2022) – Include Benchmark Timeline**

*Note: Where applicable, Column 2020 indicates the performance period (i.e., “P (19/20)”) from which data, as decided by the State, may be substituted for PY2020 performance rates due to the state of emergency declared by the federal or state government.*

#	Measure Name	Measure Description	Data Source	Benchmark due to CMS	Measure Steward	NQF	Pay for Performance Phase In (P= Performance, R= Reporting)				
							2018	2019	2020	2021	2022
<b>Domain 1: Care Integration</b>											
1	Community Partner Engagement**	Percentage of assigned enrollees 3 to 64 years of age with documentation of engagement within 122 days of assignment to a Community Partner	Admin	Q4 2021	MA EOHHS	N/A	R	R	P (19/20)	P	P
2	Annual Care Plan Completion**	Percentage of enrollees 3 to 64 years of age with documentation of a completed Care Plan during the measurement year	Admin	Q4 2021	MA EOHHS	N/A	R	P4R	P (19/20)	--	--
2*	Enhanced Person-Centered Care Planning	Percentage of enrollees 18 to 64 years of age with timely completion of a new or updated Care Plan during the measurement year	Admin	Q4 2021	MA EOHHS	N/A	--	--	R	P	P
3	Follow-up with LTSS CP after acute or post-acute stay (3 days)	Percentage of discharges from acute or post-acute stays for enrollees 3 to 64 years of age that were succeeded by a follow-up with a LTSS CP within 3 business days of discharge	Admin	Q2 2021	MA EOHHS	N/A	R	R	R	P	P
<b>Domain 2: Population Health</b>											
5	Annual primary care visit	Percentage of enrollees 3 to 64 years of age who had at least one comprehensive well-care visit during the measurement year	Admin	Q4 2021	MA EOHHS	N/A	R	R	P (19/20)	P	P

6	Oral Health Evaluation	Percentage of enrollees 3 to 20 years of age who received a comprehensive or periodic oral evaluation within the measurement year	Admin	Q4 2021	DQA	2517	R	R	P (19/20)	P	P
<b>Domain 3: Avoidable Utilization</b>											
7	All-Cause ED Visits	The rate of ED visits for enrollees 3 to 64 years of age	Admin	Q2 2021	MA EOHHS	N/A	R	R	P (19/20)	P	P
8	Hospital Readmissions (Adult)	The rate of acute unplanned hospital readmissions within 30 days of discharge for enrollees 18 to 64 years of age	Admin	Q4 2021	NCQA	1768	R	R	P (19/20)	P	P
<b>Domain 4: Member Experience</b>											
	Member Experience**	Composites Related to Member Engagement Care Planning, and Community Tenure	Survey	Q4 2021	n/a	n/a	R	R	R	P	P

\*Note: The Community Tenure measure and corresponding number (#4) were removed from the measure slate.

\*\* Composite measures

Measure Steward Definitions

- DQA: Dental Quality Alliance
- MA EOHHS: Massachusetts Executive Office of Health and Human Services
- NCQA: National Committee for Quality Assurance

**MassHealth DSRIP Community Service Agency Quality Measure Program (Prospective Measures, 2018-2022) – Include Benchmark Timeline**

*Note: Where applicable, Column 2020 indicates the performance period (i.e., “P (19/20)”) from which data, as decided by the State, may be substituted for PY2020 performance rates due to the state of emergency declared by the federal or state government.*

#	Measure Name	Measure Description	Data Source	Benchmark due to CMS	Measure Steward	NQF	Pay for Performance Phase In (P= Performance, R= Reporting)				
							2018	2019	2020	2021	2022
<b>Domain 1: Care Integration</b>											
1	Annual Physical	Percentage of members 0 to 20 years of age who received an annual physical examination and had documentation of an annual physical in the health record of the CSA provider	Hybrid	Sep 2020	MA EOHHS	N/A	R	P4R	P (19/20)	P	P
<b>Domain 2: Member Experience</b>											
2	Effective Teamwork	WFI-EZ Composite	Survey	Sep 2020	UW	N/A	R	R	R	P	P
3	Outcomes-Based	WFI-EZ Composite	Survey	Sep 2020	UW	N/A	R	R	R	P	P
4	Satisfaction	WFI-EZ Composite	Survey	Sep 2020	UW	N/A	R	R	R	P	P

Measure Steward Definitions

- MA EOHHS: Massachusetts Executive Office of Health and Human Services
- UW: University of Washington Wraparound Fidelity Index, Short Form (WFI-EZ)