

AE Attribution Framework Comments
9-14-17

Blackstone Valley Community Health Care's comments on the Attribution Framework are as follows:

2. Background

- If a member can be attributed to both a Comprehensive and a LTSS AE, is there a way to let each of the AE's know that the member is in the other AE. Coordination of care planning would be in the best interest of the patient and the AE's.

3.2 Hierarchy of Attribution for Comprehensive AEs

- We think the guidance could be more descriptive about the impact of member attribution updates to the TCOC. The MCO's should have guidance on reconciling not only the attribution list but should be required to move the costs associated with the changes.
- Additionally, having real time access to members that the AE is responsible for would help insure that each AE is truly able to take timely action to impact the total cost of care.