



Rhode Island Medicaid Accountable Entity Application FAQ

January 18, 2018 Update

1.) Question: Would like clarification on Technical proposal – is it within the application?

Answer: Section 3 of the [Comprehensive AE Application](#) provides the submission guidance. The figure on page 16 provides a submission guidance summary for the AE Application inclusive of the technical proposal. The required elements of the technical proposal are described in detail in Section 3.2.4 “Technical Proposal for the Certification as a Comprehensive AE” (Page 18).

2.) Question: Is there a requirement for a financial audit?

Answer: Please refer to Domain #2 Corporate Structure and Governance, Sections 2.1 and Section 2.2, pages 27-31 of the [Comprehensive AE Application](#).

3.) Question: Timeline for contracting with the MCOs – in April, after April?

Answer: Accountable Entities can engage in discussion with the Managed Care Organizations independent of the certification process. Please refer to the [EOHHS Medicaid Infrastructure Program Requirements](#), Section VII: Required Performance Areas and Milestones, pg. 13, “The execution of an EOHHS qualified APM contract with the MCO shall be considered the first Performance Milestone of the HSTP program”. AE’s are eligible for incentive funds once they are certified and have a qualified and executed APM contract with an MCO.

4.) Question: Is incentive funding based on contract with number of plans – Is there more opportunity for funding if contracted with more than one plan?

Answer: This is a program question independent of certification process. For more information, please refer to the [Medicaid Accountable Entity Roadmap](#) Section VIII, Medicaid Infrastructure Incentive Program (MIIP), Section A, paragraph 3a, pg. 27.

5.) Question: Can you clarify the Organizational Structure requirement. Our interpretation is that the “Governing Committee” could exist under the Established RI, Corporation, PCHC.

Answer: Please see Attachment A, page 17, [RI Medicaid Accountable Entity Program Certification Standards](#), May 31, 2017, of the Accountable Entity Program Description and Application for Comprehensive Accountable Entities.

6.) Question: In EOHHS Application-Attachment D, Domain 1.1-1.2, for provider type, please provide direction on how to answer if the provider is more than one of these (Part A: primary care, IHH, other BH, SUD, social supports, other).

Answer: In order to resolve that issue, we have updated the application to allow for secondary and tertiary provider type options, as well as added a “comments” column to allow applicant to



add a description of “other”. A “comments” column has also been added in Part B: Participating Clinicians. Please note the updated Attachment D provide entities with multiple provider types an ability to capture such information succinctly and should be utilized, if needed. The current Attachment D provided with the Application is acceptable if a single provider type is appropriate for the entity.

- 7.) Question: Can you clarify the response to Question 5 of the FAQs dated January 10, 2018? An Entity that is a RI legal entity with a separate TIN that meets the other listed requirements would satisfy the Corporate Governance and Structure Standard. Does such a qualifying entity have to have a single purpose of operating as a Medicaid AE or can an AE Provider Organization, such as an ACO, that meets all required AE requirements, also be eligible?**

An entity that meets all the required AE elements would be eligible. It is not required that the corporate entity be a single purpose entity. An ACO that meets all of the AE requirements would be eligible.

- 8.) If an AE that also contracts with other payor entities besides a Medicaid contractor can qualify, can the AE specific provisions be overseen and governed by a Governing or Advisory Committee of the AE?**

Section 2 of the Certification Standards, and Section 2.2 and 2.3 in particular, address the requirements pertaining to a Governing Committee. The reference to a Community Advisory Committee is separate and distinct from a Governing Committee. The AE certification standards do not address activities unrelated to the entity's functioning as a Medicaid certified AE.