Puerto Rico has made significant progress in the 2021 program year toward achieving reforms in compliance with P.L. 116-94: Further Consolidated Appropriations Act, 2020 and implementing program enhancements beyond those required by legislation.

### Status as of October 2021

#### Program Integrity
- Puerto Rico has developed a future state organizational structure by coordinating with the Program Integrity offices of other states and comparing staffing structures and leading practices.
- Puerto Rico has deployed a continuous improvement approach to enhance Fraud, Waste, and Abuse (FWA) efforts and evaluate opportunities to improve the program integrity framework by working to adopt leading practices from other state Medicaid programs.
- PRPIU is currently setting policies and procedures for the MCOs that will allow for control of duplicate billing, monitor for appropriate use of billing codes, and recommended new rules or policies involving prior authorization for optional services.
- PRPIU is planning for implementation of provider enrollment functions that support provider profiling, which will allow PRPIU to identify providers that should not be enrolled or enrolled with restrictions based on their history. This will also support critical PERM and MEQC requirements pertaining to provider enrollment.
- PRDOH began to implement preparatory activities to prepare for PERM and MEQC including:
  - Developing guidance and training for all key stakeholder teams.
  - Establishing teams and resources to complete formal Pilots for both programs.

#### Contracting Reform
- Puerto Rico has established a monetary threshold for professional services contracts to determine when contracts will go out for competitive procurement.
- Non-professional services and goods (examples include cleaning services for Medicaid offices, unarmed security guards, office equipment such as photocopiers, printing and mail, and water fountains) are now competitively procured by the Puerto Rico General Services Administration (PR GSA, or Administración de Servicios Generales in Spanish).
- A standardized scoring methodology for proposal evaluation is being created and implemented.
- A transparency portal and publishing process has been developed to host Request for Proposal (RFPs), Request for Information (RFIs), and related documentation.
- An enhanced, standardized process to make procurement and contracting documentation readily available upon request has been established and documented.
- Puerto Rico established processes and identified individuals to align agencies on data-strengthening priorities with clear leadership and decision-making processes.
- A standardized method to respond to CMS’ document requests is being created and implemented.
- Began conducting a data quality analysis to inventory and catalogue data sources and potential issues related to data quality and availability.
- An MCO Report Card methodology and format is in process and expected to be shared with MCOs and rolled out in the coming months.

#### Data Governance
- Puerto Rico has established processes and identified individuals to align agencies on data-strengthening priorities with clear leadership and decision-making processes.