

# Introducing Commence Health

August 11, 2025

Dear Colleague,

We are pleased to share that, effective August 18, 2025, Livanta's Beneficiary and Family Centered Care - Quality Improvement Organization (BFCC-QIO) program will be rebranded as Commence Health. This change follows the broader organizational transition from Livanta to Commence. Please read this bulletin in its entirety for important details.

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**Section 2:** What is Changing

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**Section 4:** Beneficiary Notice Update

**Section 5:** Frequently Asked Questions

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Commence Health is committed to providing our provider partners with the highest quality customer service. If you need to contact us, please email [communications@commence.ai](mailto:communications@commence.ai).

Best regards,

The Commence Health BFCC-QIO Communications Team



## Section 1: Background Information

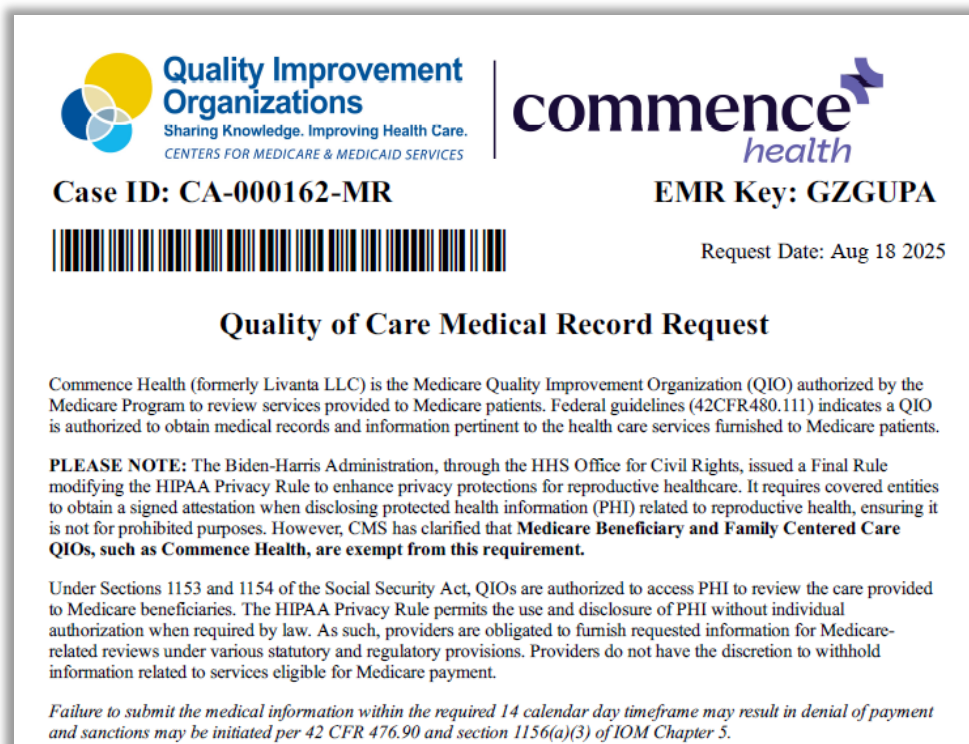
**Commence Health** is a program of **Commence**, a healthcare technology company formed through the affiliation of Advanta Government Systems, DOMA Technologies, and Livanta LLC, now operating under common ownership. **Commence** uses a data-driven, human-centered approach to improve care for healthcare beneficiaries, veterans, providers, and other stakeholders.

Because Livanta now operates under the name Commence, Livanta's BFCC-QIO program now operates under the name **Commence Health**. While the name has changed, the BFCC-QIO program continues under the same contract for Medicare Regions 2, 3, 5, 7, and 9 through April 30, 2029.

## Section 2: What Is Changing?

- **Staff Email Updates:** All staff email addresses have been transitioned to the [@commence.ai](mailto:@commence.ai) domain. Emails from Commence Health staff or shared accounts now come from this domain. For example, the new Communications Team email is [communications@commence.ai](mailto:communications@commence.ai). Messages sent to legacy Livanta email addresses will be forwarded but phased out over time.
- **Helpline Greeting Change:** Starting August 18, 2025, callers to Livanta's BFCC-QIO Helpline will hear the greeting: "*Commence Health, formerly Livanta.*" Providers, social workers, case managers, and other front-line staff should inform patients and caregivers of this change to avoid confusion.
- **Medical Record Requests:** Medical record requests will now display the Commence Health logo. See *Figure 1* below for an example of the updated request form.

**Figure 1**



The image shows a sample of a "Quality of Care Medical Record Request" form. At the top, it features the logos for "Quality Improvement Organizations" (Centers for Medicare & Medicaid Services) and "commence health". Below the logos, the form includes the "Case ID: CA-000162-MR" and the "EMR Key: GZGUPA". A barcode is present on the left side, and the "Request Date: Aug 18 2025" is noted on the right. The main title of the form is "Quality of Care Medical Record Request". The body of the form contains a paragraph explaining that Commence Health (formerly Livanta LLC) is the Medicare Quality Improvement Organization (QIO) authorized by the Medicare Program to review services provided to Medicare patients. It also includes a "PLEASE NOTE" section regarding the Biden-Harris Administration's Final Rule on reproductive healthcare privacy, stating that Medicare Beneficiary and Family Centered Care QIOs, such as Commence Health, are exempt from this requirement. A final paragraph states that under Sections 1153 and 1154 of the Social Security Act, QIOs are authorized to access PHI to review care provided to Medicare beneficiaries. At the bottom, a warning states that failure to submit medical information within the required 14 calendar day timeframe may result in denial of payment and sanctions.

Quality Improvement  
Organizations  
Sharing Knowledge. Improving Health Care.  
CENTERS FOR MEDICARE & MEDICAID SERVICES

commence  
health

Case ID: CA-000162-MR

EMR Key: GZGUPA

Request Date: Aug 18 2025

### Quality of Care Medical Record Request

Commence Health (formerly Livanta LLC) is the Medicare Quality Improvement Organization (QIO) authorized by the Medicare Program to review services provided to Medicare patients. Federal guidelines (42CFR480.111) indicates a QIO is authorized to obtain medical records and information pertinent to the health care services furnished to Medicare patients.

**PLEASE NOTE:** The Biden-Harris Administration, through the HHS Office for Civil Rights, issued a Final Rule modifying the HIPAA Privacy Rule to enhance privacy protections for reproductive healthcare. It requires covered entities to obtain a signed attestation when disclosing protected health information (PHI) related to reproductive health, ensuring it is not for prohibited purposes. However, CMS has clarified that **Medicare Beneficiary and Family Centered Care QIOs, such as Commence Health, are exempt from this requirement.**

Under Sections 1153 and 1154 of the Social Security Act, QIOs are authorized to access PHI to review the care provided to Medicare beneficiaries. The HIPAA Privacy Rule permits the use and disclosure of PHI without individual authorization when required by law. As such, providers are obligated to furnish requested information for Medicare-related reviews under various statutory and regulatory provisions. Providers do not have the discretion to withhold information related to services eligible for Medicare payment.

*Failure to submit the medical information within the required 14 calendar day timeframe may result in denial of payment and sanctions may be initiated per 42 CFR 476.90 and section 1156(a)(3) of IOM Chapter 5.*

## Section 3: What Will Stay the Same?

- **Helpline Phone Numbers:** All BFCC-QIO Helpline phone numbers will remain the same, as shown in Table 1 below.
- **Privacy Requirements:** Protected Health Information (PHI) and or Personally Identifiable Information (PII) must not be included in emails. Please refer to a case number if applicable.

**Table 1**

CMS Region (States)	Medicare Helpline	TTY Line
Region 2 (NJ, NY, PR, VI)	866-815-5440	711
Region 3 (DC, DE, MD, PA, VA, WV)	888-396-4646	711
Region 5 (IL, IN, MI, MN, OH, WI)	888-524-9900	711
Region 7 (IA, KS, MO, NE)	888-755-5580	711
Region 9 (AZ, CA, HI, NV, AS, GU, MP)	877-588-1123	711

## Section 4: Beneficiary Notice Update

Providers should update beneficiary notices by replacing "Livanta LLC" with "Commence Health," as shown in *Figure 2* below. Existing stocks of pre-printed notices with Livanta listed as the BFCC-QIO may be used until they are depleted.

**Figure 2**

Sacred Heart Hospital 12629 Riverside Dr. Valley Village, CA 1-800-555-1234

**Important Message from Medicare**

Patient name: **DOE, JOHN** Patient number: **8675309-J**

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**Your Rights as a Hospital Inpatient:**

- You can receive Medicare covered services. This includes medically necessary hospital services and services you may need after you are discharged, if ordered by your doctor. You have a right to know about these services, who will pay for them, and where you can get them.
- You can be involved in any decisions about your hospital stay.
- You can report any concerns you have about the quality of care you receive to your QIO at: **Commence Health 1-877-588-1123, TTY: 711** The QIO is the independent reviewer authorized by Medicare to review the decision to discharge you.
- You can work with the hospital to prepare for your safe discharge and arrange for services you may need after you leave the hospital. When you no longer need inpatient hospital care, your doctor or the hospital staff will inform you of your planned discharge date.

## **Section 5: Frequently Asked Questions**

**Q: I noticed emails now come from the commence.ai domain. Does that mean Commence Health is using artificial intelligence (AI) for case and claim reviews?**

**A:** No. As required by our contract with CMS, Commence Health employs licensed, board-certified physicians to conduct all review types. AI is not used for BFCC-QIO case or claim reviews. Commence Health staff do not use generative AI for BFCC-QIO tasks.

**Q: Does my organization need to sign a new Memorandum of Agreement (MOA) with Commence Health?**

**A:** No, existing MOAs with Livanta remain valid. Moving forward, new MOAs will be issued under Livanta LLC d/b/a Commence with Commence Health branding and logos.

**Q: Are your publications changing?**

**A:** Subscribers will continue to receive Provider Bulletins, *Compass*, and *Claim Review Advisor* as before, but they now feature updated Commence Health branding and logos.

**Q: Does this change affect any of Livanta's contracts with the Centers for Medicare & Medicaid Services (CMS)?**

**A:** No. All CMS contracts remain unchanged and continue to operate as before.

**Q: When will beneficiary notices listing Livanta as the BFCC-QIO become invalid?**

**A:** There are no current plans to invalidate beneficiary notices that reference Livanta. However, providers are encouraged to update notices to list Commence Health to minimize confusion for patients and caregivers.

**Q: Will I still be able to use Livanta's website-based applications such as e-LiFT?**

**A:** Yes! All website-based applications including e-LiFT, e-Appeal, and Arrow will be ported to the new website and remain fully functional.

## **Section 6: Additional Information**

The Commence Health Communications Team welcomes your questions and feedback. For additional information or to request a Provider Education session, please contact us at [communications@commence.ai](mailto:communications@commence.ai).

This material was prepared by Livanta LLC d/b/a Commence, the Medicare Beneficiary and Family Centered Care-Quality Improvement Organization (BFCC-QIO) that provides case review services for Medicare Regions 2, 3, 5, 7, and 9, under contract with the Centers for Medicare & Medicaid Services (CMS), an agency of the U.S. Department of Health and Human Services. The contents presented do not necessarily reflect CMS policy. 13-SOW-MD-2025-QIOBFCC-CP63

