

Shared Savings Program Policy & Procedure Manual PY 2023 Updates

General Updates:

- Updated to reflect CMS preference for Shared Savings Program over MSSP
- Updates for clarity, consistency, and formatting

Updates to Existing Policies:

CPG-004: Non-Discrimination

- Updated to reflect CMS' inclusion of additional cohorts for purposes of non-discrimination.
- Updated to more accurately reflect ACO reliance on the practice to provide auxiliary aid and language assistance services, as this is the most common practice amongst Shared Savings Program ACOs.

CPG-005: Beneficiary Discharge, Avoidance and Referrals

- Updated to more clearly reflect requirements and limitations around ACO referrals.
- Updated to more clearly reflect provider and practice obligations related to patient terminations.
- Updated to more clearly reflect ACO obligations following a patient termination.

CO-002: ACO Compliance Officer Duties and Responsibilities

- Updated to include CMS liaison and notification responsibilities most commonly held by the Compliance Officer.

CMO-001: Introduction

- Updated to more clearly stipulate the role of the Compliance Officer and Legal Counsel in reporting to law enforcement.

DRP-006: Record Retention

- Updated to reflect the specific requirement to maintain records of remuneration paid or received pursuant to participation in the ACO.

COM-001: ACO Communications and Material Review

- Updated to remove the requirement to submit materials for approval by CMS prior to release.
- Updated to specifically require the use of template materials related to Voluntary Alignment.
- Updated to include "Medicare.gov or any successor site" to match language utilized and preferred by CMS.

COM-002: ACO Governance and Public Reporting Requirements

- Policy Name Change to include ACO Governance.

- Policy Updates to match new requirements for the ACO's public reporting webpage.
- Policy updates to include Governance requirements to highlight the need to ensure ongoing compliance due to natural attrition in a Governing Body after initial CMS approval during the application cycle.

PVS-001: Compliance with HIPAA and DUA Requirements

- Updated to highlight and ensure compliance with commonly missed elements of the Data Use Agreement.

OPS-004: Internal Reporting on Cost and Quality Metrics

- Updated to specifically include the annual Quality Reporting process and recent guidance released by CMS related to patient matching, parsing and data cleansing.

OPS-005: Participant and Provider/Supplier List Updates

- Updated to more accurately reflect recent trends in Medicare Revalidation processes.
- Updated to document ACO review the effect of Participant additions on ACO designation and eligibility for Advanced Incentive Payments.

OPS-007: Initial Beneficiary Notifications

- Updated to reflect changes in the Beneficiary Notification requirements.

New in 2023

OPS-008: Advance Investment Payments

This policy is only required for ACOs participating in Advance Investment Payments. While these payments are not yet available, this P&P has been included in 2023 to ensure it's availability when CMS makes these payments available in the future.