

MSSP 2025 P&P UPDATES

COM-002 ACO Governance and Public Reporting Requirements

- Edits to paragraph A.1.a to account for allowable use of Designate Representatives.
- Addition of new Paragraphs III.A.1.a.i – e to clarify the role of the ACO Governing Body and document compliance as indicated by the ACO REACH Governance Audit results which identified new preferences from CMS.
- Addition of new Paragraph III.A.2 to clarify requirement to submit proposed changes to the Governing Body via the ACO-MS change request system.
- Addition of new Paragraph III.B.12 to include requirements related to an ACO's election to participate in the PC Flex Model.
- Edits to Paragraph III.C.1 to allow for updates to any portion of the public reporting page without submission for internal review as a marketing material.

PVS-001 Compliance with HIPAA and DUA Requirements

- Edits to Paragraph III.E.1 and 3 and the addition of new Paragraph III.E.2 to clarify ACO reporting requirements in the event of a breach of personally identifiable information.

CMO-001 Compliance Monitoring and Oversight Introduction

- Addition of new Paragraph III.D.2 to clarify protections of attorney work product and the privileges available for those documents.

OPS-007 Initial Beneficiary Notifications

- Edits to Paragraph III.B.3 to remove the requirement for the Follow-Up Notification to occur at the earlier of the next primary care visit or 180 days. This standard was updated for PY25 to require only that it be sent within 180 days.

OPS-006 Repayment Mechanism

- Edits to Paragraph III.D. to include language around repayment of Advanced Shared Savings.

Addition of New Policy: OPS-009 Advance Shared Savings