

## **REACH 2025 P&P UPDATES**

### **COM-002 ACO Governance and Public Reporting Requirements**

- Addition of new Paragraph III.B.2.a to include a new exception option for High Needs ACOs experiencing extreme hardship in finding a Beneficiary Representative.

### **PVS-001 Compliance with HIPAA and DUA Requirements**

- Edits to Paragraph III.E F 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-005 Beneficiary Notifications and Data Sharing Preferences**

- Edits to Paragraph III.A to account for new exception to allow ACOs not to send Notifications for Beneficiaries who are not aligned as of April 30<sup>th</sup> and for organization.
- Edits to Paragraph III.E to address changes to the Model PA language around Beneficiary Notification requirements upon Termination.

### **OPS-006 Voluntary Alignment**

- Updates for clarity and to include updated guidance from CMS related to Voluntary Alignment Activities and inclusion of individual providers.

### **OPS-008 Financial Guarantee**

- Edits to Paragraph III.A to remove the ability of an ACO to hold more than one form of Financial Guarantee.
- Edits to Paragraph III.D to match updated language in the Model PA.

### **FWA-001 FWA Laws and Utilization of Safe Harbors**

- Updates to Paragraph III.A.1 to include changes in language for reporting requirements in the Model PA.

### **FWA-002 Benefit Enhancements and Beneficiary Engagement Incentives**

- Updates to Paragraph III.E.4.a and c to remove reference to Participant Providers.