

This checklist can serve as a guide for your organization as you work through the implementation and maintenance of your ACO's Compliance Program. However, no reference tool can ever be completely comprehensive and use of this tool can never take the place of reading all relevant guidance and regulations.

GOVERNANCE

- Develop Governing Body
 - Medical Director
 - Medicare Beneficiary Representative
 - 75% Voting Control by ACO Participants
 - "Meaningful Representation" from each Participant
- Create Organizational Chart
 - ACO Executive, Medical Director, & Compliance Officer report directly to Gov. Body
 - Clear reporting lines from individuals and Sub-Committees to Gov. Body
- Create Conflict of Interest Policy & Collect Acknowledgement Forms
- Create & Approve Committee Charters
- Conduct & Document Quarterly Sub-Committee & Governing Body Meetings
- Retain ACO Operating Agreement, Executed Participation Agreements, and BAAs
- Define, Update, & Manage ACO-MS Contacts (e.g., Compliance Contact)

GENERAL COMPLIANCE

- Create & Approve Compliance P&Ps and Compliance Plan
- Create, Distribute, & Audit New Hire and Annual Compliance Training
- Create, Document, & Conduct Monitoring and Oversight Activities
- Determine & Launch a Method for Anonymous Reporting (i.e. hotline, web form)
- Review & Document Utilization of FWA Waivers and Benefit Enhancements

MARKETING/NOTIFICATIONS

- Create, Document, & Implement a Marketing Material Review Process
- File Marketing Materials with CMS for Approval
- Update & Launch the Public Reporting Webpage
- Document & Distribute Beneficiary Notifications and ACO Office Posters
- Document & Distribute Benefit Enhancement Communications, if applicable

OPERATIONS

- Create & Approve Operations P&Ps required under § 425.112
- Create, Document, & Implement an OIG/GSA Screening Process
- Track Annual and New Hire Compliance Training
- Obtain Downstream Commitments to Data Privacy Requirements

- ACO Spotlight and NextGen Newsletters
- ACO Real World Compliance Checklist
- NAACOS – www.NAACOS.com
 - ✓ Newsletter
 - ✓ Audit Readiness Handbook
 - ✓ Quality Measures Validation Audit Resource
 - ✓ Medicare Shared Savings Program Compliance Manual
- Wilems Resource Group – www.wilemsrg.com
 - ✓ Quarterly Newsletter
 - ✓ Compliance Handbooks
 - ✓ White Papers