

Communication of Regulatory Guidance & Changes

Effective Date: 7/28/2014

Draft/Review Date: 8/18/2014

Policy

- A. It is the policy of the ACO to maintain formal processes to ensure that all CMS information and/or requirements for the Medicare Shared Savings Program are communicated to ACO Participants, Providers/Suppliers, and other individuals or entities performing functions or services related to the ACO's activities in a timely manner.

Applicability

This policy and procedure applies to all Participants, Providers/Suppliers, and other individuals or entities performing functions or services related to the ACO's activities.

Procedure

- A. When notifications are received from CMS, the Compliance Officer or designee, the Collaborative Health Systems (CHS) Implementation and Integration Team (IIT), and other appropriately designated individuals will work together to determine the process for responding to the notification. The process will include identification of action items, deadlines for those items, and the creation of any supplemental documentation needed.
- B. If actions are required by the Executive Directors (EDs) or by ACO Participants or Providers/Suppliers:
 1. Communications will be sent by the end of the second business day after receipt from CMS. The communication may include but is not limited to:
 - a. Any deliverables/deadlines;
 - b. Assigned Action Owners; and/or,
 - c. Any necessary supplemental documentation.
 2. If the communication is unable to be sent by the end of the second business day, an appropriate alternative timeline for communication will be identified by Executive Leadership.
 3. An ad hoc meeting of the Board of Directors may be necessary to ensure a timely response to CMS.
- C. If actions are not required by EDs or by ACO Participants or Providers/Suppliers, Compliance will work with CHS Business Owners to ensure completion of the request and be responsible for any communications with CMS.
- D. An ad hoc meeting of the Board of Directors will be called before any official disclosures of non-compliance are made to CMS.

Communication of Regulatory Guidance & Changes

Effective Date: 7/28/2014

Draft/Review Date: 8/18/2014

- E. When there is a change in applicable laws and/or regulations related to the ACO, the Compliance Officer will submit an explanation of how the ACO plans to modify its processes to address the legal and/or regulatory changes to CMS.

Reporting

- A. Compliance will make quarterly reports to the Compliance & Ethics Subcommittee. These reports will be shared with the Board of Directors, as appropriate.

Related Documentation

- A. N/A