

# Initial Beneficiary Notifications

Effective Date: 7/28/2014

Draft/Review Date: 4/18/2014

## Policy

- A. It is the policy of the ACO to provide initial notification to Beneficiaries of their physician's participation in the ACO. Notifications will include informing Beneficiaries that their practitioners may request personal health information for care coordination and quality improvement work and educating the Beneficiaries on the implications of those requests. Notifications will give the Beneficiary a meaningful opportunity to decline having his/her health information shared with the ACO.

## 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

Initial notification to Beneficiaries will be three-fold and include: (1) an initial mailing, (2) posters, and (3) office visit procedures. The following information provides guidance as to each of the notifications.

### A. Initial Beneficiary Notification Mailings

Collaborative Health Systems (CHS) will work in conjunction with ACO Participants and Providers/Suppliers to establish the most accurate demographic data for initial Beneficiary mailings. The mailings will be provided by CHS per the CHS mail out process policy.

### B. Posters

Posters are provided by the ACO to hang in provider's offices that inform Beneficiaries that those providers are participating in the ACO. The offices display the posters in prominent places such as waiting areas.

### C. Office Visits

1. Participating professionals providing primary care services in the ACO will be provided data on those Beneficiaries assigned to them.
2. Upon the first visit to the office by any Beneficiaries, participating providers or their designee will take the opportunity to explain the Medicare Shared Savings Program and its inherent benefits to both the Beneficiaries and the healthcare system as a whole. The provider or designee will give the Beneficiary the initial ACO Notification Letter and Declining to Share Personal Health Information Preference form.
3. Participating providers will also develop an appropriate method to track that the information has been provided to the assigned Beneficiaries. Practices will utilize their Active Beneficiary Roster and an acknowledgment form to track the beneficiaries which

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have been shared the MSSP information during their first office visit. Where applicable the practices will also flag their EMR accordingly to indicate the Beneficiary has been explained the MSSP information during their first office visit

1. Signing of the acknowledgement form for receipt of initial Beneficiary notifications (and placed in Beneficiary record).
  4. On occasion, a patient may arrive for an office visit and may not be attributed to the physician and yet has received information about the ACO. In this event, the notification procedure will still be completed.
  5. The forms will be provided to the Beneficiary to:
    - a. Take with him/her to complete and mail in;
    - b. Return to the office staff; or,
    - c. Call the Medicare toll-free telephone number, 1-800 MEDICARE (1-800-633-4227), to decline having their health information shared with the ACO. TTY users should call 1-877-486-2048.
  6. Program structure and data sharing should be discussed with the Beneficiary and/or Beneficiary representative as an educational and decision-making opportunity. The following information should be provided:
    - a. The benefits of an ACO created by a focus on patient-centered care;
    - b. The rights of the Beneficiary to decline having Medicare share his/her health information at any point; and,
    - c. Notice that Beneficiaries may change their data sharing preferences at any time. If the Beneficiary requests to change his/her status after the initial notification, then the Beneficiary will need to complete and return the Consent to Change Personal Health Information Preference form.
- D. Completed forms will be mailed to the address designated on the ACO form and a copy will be placed on the chart.

### Reporting

- A. All reports related to data sharing must be sent to CHS.

### Related Documentation

- A. 42 CFR §425.312, §425.704, & §425.708
- B. ACO Notification Letter
- C. ACO Terms & Definitions Policy
- D. Beneficiary Privacy & Security Policy

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- E. Beneficiary Rosters
- F. Consent to Change Personal Health Information Preference Form
- G. Declining to Share Personal Health Information Form
- H. In-office Notification Memo
- I. Medical Records Policy
- J. Privacy & Security of Beneficiary Data Policy
- K. Social Security Act Sec. 1899

### Additional Guidance

Medicare contact information: 1-800 MEDICARE (1-800-633-4227). TTY users should call 877-486-2048; [www.medicare.gov/acos.html](http://www.medicare.gov/acos.html).