

## Public Reporting

Effective Date: 10/24/2017

Draft/Review Date: 10/24/2017

### Policy

- A. It is the policy of the ACO to promote transparency within the Medicare Shared Savings Program by ensuring compliance with all Public Reporting requirements put in place by CMS and the Medicare Shared Savings Program Final Rule.

### Applicability

- A. This policy applies to the ACO, its Participants, Provider/Suppliers and all individuals or entities providing functions or services related to ACO Activities.

### Procedure

- A. The ACO will maintain a publicly accessible website. The website will be reviewed and updated as necessary to ensure all information posted on the website is current. The website will include reporting of, at a minimum, the following:
  - 1. Organizational information, including:
    - a. Name and location of the ACO;
    - b. Primary contact information for the ACO;
    - c. Identification of ACO Participants;
    - d. Identification of Participants in joint ventures between ACO Professionals and hospitals;
    - e. Identification of the ACO's key clinical and administrative leadership;
    - f. Identification of members of the ACO's Governing Body;
    - g. Identification of associated committees and committee leadership; and
    - h. Identification of the types of Participants or combinations of Participants that formed the ACO.
  - 2. Shared Savings and Shared Losses information, including:
    - a. The amount of any payment of Shared Savings received by the ACO or shared losses owed to CMS;
    - b. The total proportion of Shared Savings invested in infrastructure, redesigned care processes, and other resources necessary to support the three-part aim goals of improved health for populations, improved care for individuals and lower growth in expenditures; and
    - c. The proportion of Shared Savings distributed among Participants.

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3. The ACO's performance on the quality measures.
  4. If applicable, the use of any waivers as described in the ACO's Medicare Shared Savings Program Waivers Policy and Procedure.
- B. The ACO's website will be considered a Marketing Material for purposes of review. All changes must be submitted to Compliance for review and approval prior to use on the website, **except:**
1. CHS Operations may update the list of Participants as needed without submitting those changes for approval.
  2. Changes to the Public Reporting requirements in compliance with the requirements of the standardized format specified by CMS are not subject to marketing review and approval under 42 CFR §425.310.
- C. CHS Operations will be responsible for maintaining the website and ensuring all public information is updated in a timely manner.
1. All updates will be made within 30 days of the effective date of the change.
  2. For purposes of:
    - a. Adding an Participant, the effective date will be January 1 of the following Performance Year;
    - b. Removing a Participant, the effective date will be the termination date of the ACO Participant Agreement.

### Reporting

A. N/A

### Related Documentation

- A. 42 CFR §425.118 and §425.308
- B. Oversight of Marketing Materials Policy
- C. Significant Changes and Participant and Provider/Supplier List Updates Policy
- D. Medicare Shared Savings Program Waivers Policy