

# Significant Changes and Participant and Provider/Supplier List Updates

Effective Date: 10/24/2017

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## Policy

- A. It is the policy of the ACO to ensure that the ACO conforms to CMS Medicare Shared Savings Program (Shared Savings Program) regulations regarding changes to the ACO's Participants and Providers/Suppliers rosters during the period of the ACO's agreement with CMS.

## 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. Significant Changes. CHS must notify CMS within 30 days of any significant change. A "significant change" occurs when the ACO is no longer able to meet the eligibility or program requirements of the Shared Savings Program.
- B. Participant and Provider/Supplier List Certification. During the term of the participation agreement, the ACO may add or remove Participants or Providers/Suppliers. Before each Performance Year, and at such other times as specified by CMS, the ACO must submit to CMS a certified Participant list and a Provider/Supplier list.
  1. All Medicare enrolled individuals and entities that have reassigned their right to receive Medicare payment to the TIN of the Participant must be included on the Provider/Supplier list and must agree to participate in the ACO and comply with the requirements of the Shared Savings Program before the ACO submits the Participant and Provider/Supplier list to CMS.
- C. Participants. When a Participant is added or removed from the ACO:
  1. The Participant or another member of the ACO will notify the Governing Body of the change (if the Governing Body is unaware of the change or are not initiating the change themselves).
  2. The Governing Body will then notify CHS of the change, and CHS will take the appropriate steps to update its records and notify CMS.
    - a. For a Participant termination, the termination must be done in writing in accordance with the termination provision in their Participant Agreement. This written termination must accompany the Governing Body's notification to CHS.
    - b. For a Participant addition, the notification to CHS must include completion of both tabs in the ACO Participant Add workbook, the signed Participant Agreement, a screenshot from Provider Enrollment Chain and Ownership

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System (PECOS) showing current enrollment, a signed W9 Tax form and any appropriate supporting documentation.

- c. For a Participant change, the notification to CHS must include completion of the appropriate tab in the ACO Participant Add workbook, a screenshot from PECOS (if necessary) and any appropriate supporting documentation.
  3. The Governing Body may notify CHS in any manner they see fit.
  4. The Participant is responsible for notifying all Providers/Suppliers of their involvement (or termination of involvement) with the ACO.
  5. CHS is responsible for ensuring that a Participant that leaves the ACO removes all signs and materials from their practice location and returns them to CHS or destroys them.
  6. Any changes to the Participant List must be brought to CHS's attention within a reasonable time of the addition/termination, but not later than 7 days after the Governing Body is notified of the change request.
  7. CHS is responsible for notifying CMS of the addition or termination as required by §425.118.
    - a. For additions, this notification will occur in the time and manner specified by CMS for that Performance Year. Additions approved by CMS will become effective as of the first day of the subsequent Performance Year.
    - b. For deletions, this notification will occur within 30 days of the termination. Deletions become effective, for purposes of care coordination and Beneficiary assignment, as of December 31st of the current Performance Year. The Participant is removed from the Participant List as of the date of the termination of the Participant Agreement.
  8. CHS is responsible for updating the ACO's Public Disclosure with Participant changes.
    - a. For a Participant termination, CHS will have 30 days from the date that the termination is submitted to CMS to update the ACO's Public Disclosure.
    - b. For a Participant addition, CHS will have 30 days from the date that CHS is notified that the Participant's application for addition is accepted by CMS to update the ACO's Public Disclosure.
- D. Providers/Suppliers. When a Provider/Supplier is added or removed from the ACO, the change must be noted:
1. The ACO is required to notify CMS within 30 days after an individual or entity becomes, or ceases to be, a Medicare-enrolled provider or supplier that bills for items and services it furnishes to Beneficiaries under a billing number assigned to the TIN of a Participant.

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This notification must be submitted in the form and manner specified by CMS for the relevant Performance Year.

2. The Participant and Providers/Suppliers must log in to the Provider Enrollment Chain and Ownership System (PECOS) and make the appropriate changes.
3. The Participant must submit a Provider/Supplier Roster update file. A template of this file is available on the ACO SharePoint site. The file is due to CHS on the 5<sup>th</sup> business day of every month. This file may be submitted via the ACO's SharePoint Site by the ACO's Market Operations staff.
  - a. For all Provider/Supplier additions a screen shot from PECOS showing current enrollment should be provided.
4. CHS will take the appropriate steps to add or remove the Provider/Supplier, as specified by CMS for that Performance Year. CHS has 30 days to update the Provider/Supplier Roster and notify CMS in the case of changes to the roster of Federally Qualified Health Centers (FQHC) and Rural Health Centers (RHC).
  - a. Additions and deletions are effective as of the date on which the individual or entity became, or ceased to be, a Provider/Supplier.
- E. CHS will store the results of the change in an archive for the ACO on the ACO's SharePoint Site.

### Reporting

- A. The Governing Body must notify CHS of all Participant additions/deletions and may notify CHS of such changes via the ACO SharePoint.
- B. The Provider/Supplier Roster update file is due to CHS by the 5<sup>th</sup> business day of every month. This file may be submitted via the ACO's SharePoint Site by the ACO's Market Operations staff.

### Related Documentation

- A. 42 CFR §425.214(a), 42 CFR §425.118