

## DCE Real World Compliance Checklist

This checklist can serve as a guide for your organization as you work through the implementation and maintenance of your Direct Contracting Entity (DCE) 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
  - Beneficiary Representative
  - Consumer Advocate
  - 25% Voting Control by DC Participants
- Create Organizational Chart
  - Executive, Medical Director, & Compliance Officer report directly to Gov. Body
  - Clear reporting lines from individuals and Sub-Committees to Gov. Body
- Send GPDC Model PA to Governing Body, Participants & Preferred Providers
- Create Conflict of Interest Policy & Collect Acknowledgement Forms
- Create & Approve Committee Charters
- Conduct & Document Quarterly Sub-Committee & Governing Body Meetings
- Retain DCE Operating Agreement
- Ensure Compliance with Risk Bearing Entity Requirements in your State
- Define, Update, & Manage Contacts in 4i (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
  - Run Internal Audits on Contracting, Notifications & PVA
- Determine & Launch a Method for Anonymous Reporting (i.e., hotline, web form)
- Review & Document Utilization of Benefit Enhancements and Beneficiary Engagement Incentives

## MARKETING/NOTIFICATIONS

- Create, Document, & Implement a Marketing Material Review Process
- Develop & Submit a Marketing Plan and Voluntary Alignment Plan, if applicable
- Update & Launch the Public Reporting Webpage
- Document & Distribute Beneficiary, Participant and Preferred Provider & TIN Executive Notifications
- Document Distribution & Receipt of PVA Forms, if applicable
- Document Beneficiary Complaints and/or Questions related to PVA
- Document & Distribute Benefit Enhancement Communications, if applicable
- Translate materials, if required in your market

## OPERATIONS

- Retain Executed Participation Agreements, Fee Reduction Agreements and BAAs
  - Obtain TIN Level Agreements only if Exceptions are met
- Create & Approve Required Operations P&Ps
- Create, Document, & Implement an OIG/GSA Screening Process
- Track Annual & New Hire Compliance Training
- Obtain Downstream Commitments to Data Privacy Requirements
- Create & Implement Ad-Hoc Additions & Deletions Process, including notifications
- Create & Implement Provider Payment Processes

## DCE Compliance Resources

- CMS Direct Contracting Newsletters
- DCE Real World Compliance Checklist
- FLAACOS – [www.FLAACOS.com](http://www.FLAACOS.com)
- NAACOS – [www.NAACOS.com](http://www.NAACOS.com)
- Wilems Resource Group – [www.wilemsrg.com](http://www.wilemsrg.com)
  - ✓ Quarterly Newsletter
  - ✓ Compliance Handbooks
  - ✓ White Papers