

ACO REACH Real World Compliance Checklist

This checklist can serve as a guide for your organization as you work through the implementation and maintenance of your ACO Compliance Program under the ACO REACH Model. 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. We will update this checklist as more information is received from CMS.

GOVERNANCE

- Develop Governing Body
 - Medicare Beneficiary Representative
 - Consumer Advocate (*Note: Consumer Advocate may **NOT** also serve as the Medicare Beneficiary*)
 - 75% Voting Control by Participants, or their designate representative
- 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 REACH 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 ACO 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
 - Ensure Monitoring of Health Equity Plan
- 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 Bene 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
- Develop Health Equity Plan
- 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

ACO REACH Compliance Resources

- CMS Newsletters
- ACO REACH Real World Compliance Checklist
- FLAACOS – www.FLAACOS.com
- NAACOS – www.NAACOS.com
- Wilems Resource Group – www.wilemsrg.com
 - ✓ Quarterly Newsletter
 - ✓ Compliance Handbooks
 - ✓ White Papers