

# Optional Implementation Period for GPDC Model PY 2022 Pros & Cons

A DCE Compliance Team Perspective

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The Centers for Medicare & Medicaid Services (CMS) recently announced the ability of deferred DCEs to participate in an Implementation Period (IP) prior to the start of the 2022 Performance Year. The IP would run from August 1<sup>st</sup> to December 31<sup>st</sup>, and would give DCEs the opportunity to conduct Voluntary Alignment activities during the ramp up to 2022.

Wilems Resource Group (WRG) worked with several DCEs during the initial IP for the GPDC Model in 2019. Based on our experience, there are a few pros and cons each DCE should consider when trying to decide whether the IP juice is worth the squeeze.

## Voluntary Alignment

**Pro:** DCEs participating in the IP are allowed to conduct voluntary alignment activities which can help solidify alignment roster for 2022. This is particularly beneficial for any DCEs struggling to meet the beneficiary alignment minimums for the year.

**Cons:** In order to conduct Voluntary Alignment, the DCE must develop a Voluntary Alignment Plan (along with any relevant materials) and submit this plan to CMS for approval **prior to conducting any activities**. The CMS review of these plans is taking over a month in many cases and may not leave much time for you to conduct the activities and process returned forms. For paper-based voluntary alignment, CMS requires very specific elements to be in place prior to including a Beneficiary on the Voluntary Alignment Template. The DCE will need to ensure appropriate compliance monitoring of this process from start to finish.

## Safe Harbors

**Pros:** DCEs participating in the IP will have access to the [Federal anti-kickback statute safe harbor for CMS-sponsored model arrangements](#). This may allow your DCE to provide incentives for participating providers to focus on DCE initiatives in preparation for the Performance Year.

**Cons:** Safe harbor protections are different than those provided by the waivers for the Next Generation ACO Model and the Medicare Shared Savings Program, and may require additional analysis on the part of your legal and compliance teams. Any initiatives occurring under waiver protection should be monitored by compliance as well.

## Compliance Program Requirements

**Cons:** We are starting with the cons on this one because they are more obvious. If your DCE is participating in the IP, then your DCE must start meeting the Compliance Requirements of the GPDC Model, these include but aren't limited to:

- Beneficiary Notification Distribution
- Compliance Training
- Anonymous Reporting Hotline or Tool
- OIG/GSA Screenings
- Public Disclosure Requirements & Website Creation
- Governing Body Membership

**Pros:** All of these requirements will have to be met during the Performance Year, so getting a head start on them during the IP isn't necessarily a bad thing. Plus, CMS is less likely to audit a DCE during the IP which gives you a few more months to work out any kinks in new processes.

## Is IP Juice Worth the Squeeze?

As we like to say, "that's purely an operational decision". Regardless, we are here to help. Check out our free resources on building and implementing a DCE Compliance Program or reach out to Kimberly directly at [kwilems@wilemsrg.com](mailto:kwilems@wilemsrg.com).