

MSSP PREPARING FOR ACO REACH

START YOUR JOURNEY NOW



This checklist can serve as a guide for MSSP ACOs transitioning to the REACH Model. This resource serves to prepare the ACO to implement and operationalize the new requirements under the ACO REACH Model. 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

- Identify a Medicare Beneficiary and a Consumer Advocate with professional experience or ensure completion of training (*Note: A REACH ACO **must** have different people serving in these roles*)
- Identify changes to Governing Body to providing voting authority to Medicare Beneficiary & Consumer Advocate while maintaining 75% requirements
- Send REACH Model Participation Agreement to Governing Body Members
 - Ensure appropriate documentation to create an audit trail

COMPLIANCE PROGRAM

- Update P&Ps & Monitoring to reflect regulatory differences between the programs*
Key areas to consider:
 - Data Privacy Requirements
 - Marketing Material and Activities
 - Notifications: Beneficiary, Participant, Preferred Provider & TIN Executives
 - Fee Reduction Agreement Forms
 - Paper-Based Voluntary Alignment
 - Health Equity Plan
- Determine method for documenting downstream compliance with privacy requirements

CONTRACTING

- Collect TIN Level Agreements **only if** the TIN meets the six (6) CMS criteria
- Consider adding an Exhibit listing each NPI and a clause allowing the Exhibit to be updated upon notice to the TIN Executive
- Collect TIN Level Fee Reduction Agreements for each Participant/Preferred Provider participating in TCC/PCC/APO – ensure each name & NPI are listed
- Update Compliance Monitoring Program to ensure compliance with these requirements

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PARTICIPANT, PREFERRED PROVIDER & TIN EXECUTIVE NOTIFICATIONS

- Develop process for identification of ad-hoc additions and deletions
- Identify process for delivery of all required notifications**
- Ensure appropriate documentation to create an audit trail for notifications
 - Document at the individual level for audit purposes
- Update P&Ps to reflect requirement and process of notification
- Update Compliance Monitoring Program to ensure compliance with this requirement
- Consider including REACH Model Participation Agreement, NPI Exhibit, and TCC/PCC/APO education to check 3 boxes at once

BENEFICIARY NOTIFICATIONS

- Identify process for delivery of notification and gap-closure for “undeliverable” notices
- Ensure appropriate documentation to create an audit trail for notifications
- Update P&Ps to reflect requirement and process of notification
- Update Compliance Monitoring Program to ensure compliance with this requirement

MARKETING

- Prepare for CMS 10-day file and use approval timeline
- Translate materials if 5% of beneficiaries speak a primary language other than English (e.g., Beneficiary Notification)
- Develop Marketing Plan that includes Voluntary Alignment activities, if applicable, and submit to CMS for approval
 - Develop internal training, controls & documentation for PVA, if applicable
- Consider creating a Material Log and Tracking Process

BENEFIT ENHANCEMENTS & BENEFICIARY ENGAGEMENT INCENTIVES

- Develop P&Ps based on approved Implementation Plans
- Update Compliance Monitoring Program to ensure compliance with elements
- Consider reporting up to Committees/Governing Body

**NAACOS offers an ACO REACH Model Compliance Manual with template Policies & Procedures.*

*** Preferred Provider and TIN Executive Notifications may go to the same person. Send both anyway. The REACH Model requires notification to be sent at least 7 days prior to initial list and “prior to” ad-hoc additions.*