

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
 - Medical Director
 - Beneficiary Representative
 - Consumer Advocate
 - 25% Voting Control by DC Participants
- Create Organizational Chart
 - DCE Executive, Medical Director, & Compliance Officer report directly to Gov. Body
 - Clear reporting lines from individuals and Sub-Committees to Gov. Body
- Send Participant Agreement 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, Executed Participation Agreements, and BAAs
- 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
- Determine & Launch a Method for Anonymous Reporting (i.e., hotline, web form)
- Review & Document Utilization of Benefit Enhancements and Beneficiary Engagement Incentive

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 & Distribute Benefit Enhancement Communications, if applicable
- Translate materials, if required in your market

OPERATIONS

- 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
- NAACOS – www.NAACOS.com
- Wilems Resource Group – www.wilemsrg.com
 - ✓ Quarterly Newsletter
 - ✓ Compliance Handbooks
 - ✓ White Paper