

PREPARING FOR DIRECT CONTRACTING

START YOUR JOURNEY NOW



This checklist can serve as a guide for ACOs transitioning to the Direct Contracting (DC) Model. This resource was created to prepare the organization to implement and operationalize the new requirements under the Direct Contracting 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.

GOVERNANCE

- Identify a Consumer Advocate with professional experience or ensure completion of training
(Note: the Consumer Advocate can also serve as the Medicare Beneficiary)
- Identify changes to governing body based on movement from 75% to 25% participant control requirement
- Send DC Model Participation Agreement to Governing Body Members
 - Ensure appropriate documentation to create an audit trail

COMPLIANCE PROGRAM

- Update P&Ps 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
- Determine method for documenting downstream compliance with privacy requirements
- Ensure ability to complete Compliance Training within first 90 days of the program

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
- Determine whether to include Voluntary Alignment Form if doing a paper mailing
 - Ensure appropriate documentation to create an audit trail and retain return envelopes

PARTICIPANT, PREFERRED PROVIDER & TIN EXECUTIVE NOTIFICATIONS

- Identify process for delivery of all required notifications
- 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
- Consider including DC Model Participation Agreement to check 2 boxes at once