WILEMS RESOURCE GROUP

HEALTHCARE COMPLIANCE & ENGAGEMENT CONSULTING

WILEMS
resource group

Hi.

"We're not happy until you're not happy"

- Wilems Resource Group (WRG) was founded by Kimberly Wilems-Busenbark in 2015 after serving as the acting Compliance Officer for 35 ACOs. Since then, WRG has served as a resource for more than 100 ACOs.

- We've been at the forefront of value-based care since the inception of the Medicare Shared Savings Program (MSSP).

- Our team has helped clients navigate compliance in the MSSP, Next Generation ACO Model, Global & Professional Direct Contracting Model, and the ACO Realizing Equity, Access and Community Health (REACH) Model.

- We've had the unique opportunity to experience first-hand the many challenges Value-Based Organizations encounter related to compliance, engagement, and operations.

- Our team has a proven track record of helping value-based care organizations meet regulatory requirements and educating providers, practice managers, and Medicare Beneficiaries on respective CMS programs and models.

WILEMS
resource group

A DIFFERENT TYPE OF CONSULTING FIRM

DON'T BE SCARED (well, maybe just a little)

WILEMS

resource group

What We Do Best

○ Compliance Program Consulting
- ACO Compliance Officer
- Compliance Program and Policy & Procedure Creation
- Compliance Program Management
- ACO Compliance Education for Leadership
- Compliance Resource

○ Compliance Program Audits & Reviews
- Compliance Program Readiness Reviews
- Respond to CMS Audits
- Mock Audits

○ Engagement & Compliance Operations Consulting
- Marketing Plan & Material Review
- Beneficiary & Provider Engagement
- Health Equity Plan Review
- Benefit Enhancement & BEI Implementation Plan Review
- Compliance Process Oversight

○ Compliance Training & Reporting

WILEMS
resource group

5 Element ACO Compliance Program

Compliance Official

Mechanisms for Identifying Issues

Compliance Training

Method for Anonymous Reporting

Requirement for Reporting Violations of Law

WILEMS
resource group

COMPLIANCE

START TO SLEEP AT NIGHT

WILEMS
resource group

Compliance Officer: Kimberly Busenbark

When Kimberly serves as the named compliance officer, the WRG team provides support that may include:

- ✓ Ongoing Monitoring and Oversight of ACO Compliance Program Requirements

- ✓ Regulatory Communication and Updates

- ✓ Effective and Compliant Implementation of Operational Requirements

- ✓ Creation and Monitoring of Annual Compliance Training Requirements

- ✓ Privacy Concerns under the Program/Model

- ✓ CMS Liaison Responsibilities

- ✓ Investigation, Management and Documentation of Compliance Issues

- ✓ Use, Implementation, and Documentation of Benefit Enhancements and Waivers

- ✓ Marketing Material Requirements and Submission Protocols

- ✓ Website and Public Disclosure Requirements

- ✓ Documentation and Audit Preparedness for CMS Audits

Compliance Documentation Creation

o WRG utilizes existing elements and builds a program that works with the operational activities currently in place at the ACO.

o Depending on the needs of the ACO, this may include the creation and implementation of policies & procedures, a monitoring program, and guidance for:

- Documentation of Governance & Leadership Requirements
- Privacy Requirements specific to the Program/Model
- Compliance Document Review & Approval Processes
- Utilization & Documentation of Benefit Enhancements and Waivers
- Communication of CMS Notifications & Guidance
- Compliance Reporting & Investigations
- Marketing Material Review Processes and CMS Approval
- Compliance Training Completion
- Access Management for CMS Systems

Compliance Education for Leadership

o Customized 1.5-hour training via Microsoft Teams

o Educates ACO Leadership on the compliance program requirements, operational considerations, audit preparedness, best practices, and CMS red flag issues

o Includes open Q&A for attendees

Compliance Resource

Kimberly and the WRG team are available to lend a hand.

When WRG is a compliance resource, the team is available to:

o Answer questions related to CMS Programs/Models

o Provide guidance on best practices

o Recommend, develop, and implement Corrective Actions

o Assist with audit responses and applications

o Develop template communications for compliance processes

Compliance Mock Audits

○ WRG will conduct a mock audit of the required program elements that mimics a CMS audit.

○ Mock Audit Types:

- ACO Compliance Program
- Written Arrangements
- Voluntary Alignment
- ACO Roster Management
- Participant & Preferred Provider Contracting & Notifications Process
- Benefit Enhancement & Beneficiary Engagement Incentives

○ WRG provides a report that the ACO can leverage as documentation for CMS, to close gaps in existing processes, and implement corrective actions.

Compliance Program Readiness Review

o The Readiness Review will identify gaps in activities and ensure documentation is sufficient to meet minimum regulatory requirements.

o The review will focus on the following:

- **Compliance with Regulatory Requirements** – ensuring the compliance program is sufficient to meet the minimum regulatory requirements outlined in the Shared Savings Program or ACO REACH Model Participation Agreement.

- **Audit Preparedness** – ensuring the ACO is currently documenting the compliance elements sufficiently to pass a Compliance Program Audit.

- **Practical Implementation** – ensuring effective implementation of the elements that are documented in the ACO's Compliance Program.

Mock Audit & Readiness Review Phases

o **Phase 1 Initial Documentation Request:** WRG provides an Initial Document Request.

o **Phase 2 Clarification:** WRG reviews provided documentation and schedules a call with the ACO to confirm understanding of processes where gaps appear to exist, or documentation is unclear.

o **Phase 3 Secondary Information Request:** WRG develops a Secondary Information Request to identify whether specified processes have been implemented and documentation is sufficient.

o **Phase 4 Findings Report:** WRG provides a report that includes the requirement, summary of documentation, finding (e.g., 'noncompliant'), and recommendations or best practice guidance.

ENGAGEMENT & OPERATIONS

GAIN THE SUPPORT YOUR ORGANIZATION NEEDS

WILEMS
resource group

Engagement Resource

The WRG team has vast experience with CMS/CMMI guidelines and regulations for communication with the general public, physicians, and Medicare Beneficiaries.

When WRG is an engagement resource, the team is available to:

- Answer questions related to CMS Programs/Models
- Provide guidance on marketing processes for Voluntary Alignment, BEIs, Beneficiary Notifications, and required CMS templates
- Assist with operationalizing marketing policies and procedures
- Review existing materials and provide recommendations
- Create and submit ACO Marketing Plans
- Develop Voluntary Alignment and Benefit Enhancement outreach and communication
- Build model/program-specific Beneficiary and Provider communication

Operations Resource

The WRG team has worked with many organizations across the country to compliantly operationalize ACO initiatives.

When WRG is an operations resource, the team is available to:

- Answer questions related to CMS Programs/Models
- Review HEPs and BE/BEI Implementation Plans prior to CMS submission
- Guide process development for HEPs, BE/BEIs, and other ACO initiatives
- Assist with implementation of compliance policies and procedures
- Provide administrative support for compliance operations

TRAINING & REPORTING

MAKE COMPLIANCE TRAINING *LESS* PAINFUL

WILEMS
resource group

ACO Compliance Training

o Your ACO should be providing Compliance Training for all individuals providing functions or services related to ACO activities.

o Training should be completed annually and upon hire and/or contracting for those new to the ACO.

o WRG developed this product to help organizations feel less pain when rolling out the required training (because compliance training can never truly be pain-free).

WILEMS
resource group

WRG Online Training

o **Easy-Access:** Individuals visit WWW.WRGTRAINING.COM and enter the ACO username/password to access anytime from anywhere

o **Self-Study:** Individuals read content at their leisure

o **User Attestation:** Individuals don't waste time on quizzes, but attest to completion & understanding of training module content

o **Frequent Updates:** Content is updated often to reflect changes in regulation and new guidance from CMS

How Training Works

o   Each ACO receives a single username and password with template instructions to distribute to all ACO-related individuals.

o   Once an individual has viewed the training module, they are prompted to complete and submit an attestation. This action confirms that they have read and understand the materials covered by the training module.

o   Monthly attestation completion reports will be provided to the ACO Compliance Officer and/or Leadership. Reports may be provided more frequently as deadlines approach. Reporting frequency will be discussed upon contracting.

o   This service will not include data analysis of provider or staff training rosters or direct communication with individuals who are overdue or submitted incomplete attestations. Training gaps must be identified by the ACO.

MSSP ACO Compliance Training

○ The comprehensive module includes three sections:
1. Medicare Shared Savings Program Overview
   - ✓ ACO 101
   - ✓ Compliance Program Requirements (the 5 elements)
   - ✓ Red Flag Areas
2. Fraud, Waste, and Abuse
   - ✓ Relevant FWA Laws
   - ✓ FWA Waivers
   - ✓ Payment Rule Waivers
3. Privacy
   - ✓ HIPAA & Privacy Laws
   - ✓ Data Use Requirements
   - ✓ Disclosure of PHI/PII

WILEMS
resource group

Add-On: MSSP DUA Custodian Training

o The Data Use Agreement (DUA) holds an MSSP ACO and DUA Custodians to data standards **above and beyond** the Health Insurance Portability and Accountability Act (HIPAA).

o CMS has made all ACO-MS Contacts, regardless of role within the ACO, DUA Custodians.

o DUA Custodians are responsible for knowing and complying with the DUA requirements.

o WRG created the DUA Custodian Training to help ACO-MS Contacts understand the DUA and operational requirements.

o The training module includes:
   ✓ Data Use Agreement Overview
   ✓ DUA Custodian Responsibilities
   ✓ Data Sharing Requirements

WILEMS
resource group

REACH ACO Compliance Training

o   The comprehensive module includes three sections:

1. ACO REACH Model Overview
    - ✓ REACH ACO 101
    - ✓ Compliance Program Requirements (the 5 elements)
    - ✓ Voluntary Alignment
    - ✓ Red Flag Areas

2. Fraud, Waste, and Abuse
    - ✓ Relevant FWA Laws
    - ✓ Safe Harbors
    - ✓ Benefit Enhancements

3. Privacy
    - ✓ HIPAA & Privacy Laws
    - ✓ Data Use Requirements
    - ✓ Disclosure of PHI/PII

WILEMS
resource group

Add-On: REACH Consumer Advocate Training

o   REACH ACO Governing Bodies are **required** to include an individual with professional experience or training as a Consumer Advocate. This individual cannot be the same as the Medicare Beneficiary Representative.

o   WRG created the Consumer Advocate Training to help ACOs prepare advocates specifically for the model and help guide them in increasing the beneficiary voice in ACO operations.

o   Both the Consumer Advocate and Medicare Beneficiary would benefit from this training.

o   The training module includes:
   ✓   ACO REACH Model Background
   ✓   Basic Model Requirements
   ✓   The Role of the Consumer Advocate
   ✓   The Consumer Advocate Voice in the REACH ACO

WILEMS
resource group

Compliance Reporting

o The ACO is required to implement a method by which ACO-related individuals can **anonymously** report suspected problems related to the ACO and ACO activities.

o WRG hosts an online Compliance Reporting Tool to ensure ACO-related individuals can submit a report anytime from anywhere and choose to remain anonymous.

o The reports are transmitted to the designated individual(s) within the ACO for investigation and follow-up.

o Reports are re-routed within the ACO if the designated individual is implicated in a report.

o **This product is included at no cost when the ACO purchases WRG compliance training.**

CONTACT

Kimberly Busenbark, CEO

kwilems@wilemsrg.com

WILEMS
resource group