

PREPARING FOR DIRECT CONTRACTING

START YOUR JOURNEY NOW

This checklist can serve as a guide for ACOs transitioning to the Global & Professional Direct Contracting Model. This resource was created to prepare the organization to implement and operationalize the new requirements under the GPDC 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 GPDC 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

CONTRACTING

- Collect provider-level agreements unless 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 Fee Reduction Agreements for each Participant/Preferred Provider participating in TCC/PCC/APO
- Update Compliance Monitoring Program to ensure compliance with these requirements

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

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

MARKETING

- Prepare for CMS 10-day file and use approval timeline
- Translate materials if 5% of DCE aligned 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
- Consider creating a Material Log and Tracking Process

BENEFIT ENHANCEMENTS

- 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 a GPDC Model Compliance Manual with template Policies & Procedures.*

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