

Required Public Disclosures for Waivers in Connection with the Medicare Shared Savings Program

The Centers for Medicare and Medicaid Services and the U.S. Department of Health and Human Services Office of Inspector General have provided certain waivers of federal fraud and abuse laws in connection with the operation of accountable care organizations that have entered into a participation agreement under the Medicare Shared Savings Program (“**MSSP**”). See 80 FR 66725.

In order to receive the benefit of the ACO Participation Waiver, the Board of Managers of Aledade Accountable Care 15, LLC (“**ACO**”) made a bona fide, detailed determination that the following arrangement between the ACO and the practices participating in the ACO (that arrangement, the “**Arrangement**”; those practices, the “**Participating Practices**”) is reasonably related to the purpose of the MSSP, and is publicly disclosing the Arrangement in accordance with the requirements of the MSSP:

The ACO will operate a “High Priority AWV Completion Challenge” (the “**Challenge**”) from 10/1/2017 to 12/31/2017 in order to encourage the completion and coding of high-priority Annual Wellness Visits (“**AWVs**”). Each week during the Challenge, the ACO will use claims billed data to calculate which Participating Practice has the most completed high-priority AWVs per provider for the previous week. The ACO will announce its determination of the “winning” Participating Practice for the previous week during the subsequent week and will then provide the Office Manager of that Participating Practice with gift cards to either Amazon.com or Wawa for distribution in the office.

The governing body of the ACO authorized the application of the ACO Participation Waiver to the Arrangement on September 6, 2017, following a determination that the Arrangement supports the goals of the ACO and is reasonably related to the purposes of the MSSP. Specifically, by incentivizing providers to complete and code high-priority wellness visits, the Arrangement:

1. Promotes evidence-based medicine and patient engagement;
2. Promotes care coordination;
3. Contributes to meeting the quality performance standards of the Shared Savings Program;
4. Promotes evaluating health needs of the ACO’s assigned population; and
5. Facilitates the communication of clinical knowledge and evidence-based medicine to beneficiaries.

The ACO will publicly disclose additional arrangements that qualify for the ACO Participation Waiver as they are authorized by its governing board on this website, in compliance with CMS’s public disclosure requirements.