

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 Florida Central ACO, 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 “Transitional Care Management (TCM) Challenge” (the “**Challenge**”) from June 1, 2018 to July 31, 2018 in order to encourage the completion of Transitional Care Management visits (“**TCMs**”) for eligible patients recently discharged from the hospital. Each week during the Challenge, the ACO will use claims billed data to calculate which Participating Practice has the most completed TCMs per number of patients from two weeks prior. The ACO will announce its determination of the “winners” for two weeks prior and will then provide the “winners” with gift cards for distribution in the office.

The governing body of the ACO authorized the application of the ACO Participation Waiver to the Arrangement on May 16, 2018, 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 transitional care management visits, the Arrangement:

1. Promotes evidence-based medicine and patient engagement;
2. Promotes care coordination, such as through the use of telehealth, remote patient monitoring, and other enabling technologies;
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.