



Trinity Health ACO Policy No. 02

EFFECTIVE DATE: June 1, 2016

POLICY TITLE:

Public Reporting Requirements

REVIEW BY: May 30, 2019

POLICY

Trinity Health ACO will create and maintain a publicly accessible website to report information required for public reporting under the Next Generation ACO (“NGACO”) Model and will make timely updates to the information within 30 calendar days of any change. Publicly reported information is also subject to NGACO marketing requirements as addressed in Trinity Health ACO Policy No. 6 *Descriptive Materials and Marketing Activities*.

PROCEDURE

1. Trinity Health ACO will maintain a dedicated publicly accessible website to report required program information in accordance with Centers for Medicare and Medicaid Services ("CMS") NGACO Model requirements.
2. The website is subject to CMS NGACO requirements applicable to descriptive ACO materials and marketing activities. The website content is therefore subject to CMS review requirements as described in Trinity Health ACO Policy No. 6 *Descriptive Materials and Marketing Activities*.
3. Trinity Health ACO will report on the website all required information in accordance with any public reporting template and/or instructions provided by CMS. The following information is required to be reported by CMS:
 - a. Organizational Information
 - I. ACO name and location;
 - II. ACO primary contact;
 - III. Identification of ACO Participants and Preferred Providers;
 - IV. Identification of all joint ventures between or among the ACO and any of its Next Generation Participants and Preferred Providers;
 - V. Identification of the ACO’s key clinical and administrative leaders and the name of any company by which they are employed; and

VI. Identification of members of the ACO governing body and the name of any entity by which they are employed.

b. Shared Savings and Losses

- i. The amount of any shared savings earned or losses incurred for any Performance Year;
- ii. The proportion of Shared Savings invested in infrastructure, redesigned care processes, and other resources necessary to improve outcomes and reduce Medicare costs for beneficiaries.
- iii. The proportion of Shared Savings distributed to ACO Participants and Preferred Providers.

c. Quality Performance Results

3. Trinity Health ACO will update or revise the required information in #2 within 30 calendar days of any change or as otherwise specified by CMS. Any material changes to the Trinity Health ACO website will be submitted to CMS for review in accordance with Trinity Health Policy No. 6 *Descriptive Materials and Marketing Activities*.
4. The public reporting requirements are revised periodically by CMS. Refer to current CMS NGACO Model public reporting instructions for additional information.

DEFINITIONS

Participants means a Medicare enrolled provider or supplier that is identified on the required Participant List and, pursuant to a written agreement, has agreed to participate in Trinity Health ACO.

Participant List means the list that identifies each Participant that is approved by CMS for participation in Trinity Health ACO, as updated from time to time in accordance with the NGACO Model Participation Agreement.

Performance Year means the 12-month period beginning on January 1 of each year during the term of the NGACO Model Participation Agreement.

Preferred Provider means an individual or entity that is a Medicare enrolled provider or a supplier that is identified on the Preferred Provider List and, pursuant to a written agreement, has agreed to participate in Trinity Health ACO.

Preferred Provider List means the list of Preferred Providers that are approved by CMS for participation in Trinity Health ACO, as updated from time to time in accordance with the NGACO Model Participation Agreement.

POLICY CONTACT

For questions regarding this policy, please contact the Trinity Health ACO Support Services Team.

RELATED PROCEDURES AND OTHER MATERIALS

- NGACO Model Participation Agreement section XVI. *Public Reporting and Release of Information*
- CMS NGACO Model Public Reporting Guidance
- Trinity Health ACO Policy No. 6 – *Descriptive Materials and Marketing Activities*

APPROVALS

Initial Approval: Trinity Health ACO Leadership & Operations Team – May 26, 2016

Subsequent Review/Revision(s): *[insert dates of all subsequent reviews/revisions]*