

Innovative Health Alliance of New York

IHANY Policy No. 02

EFFECTIVE DATE: 09/21/2015

POLICY TITLE:

Beneficiary Notifications

***To be reviewed every three years by:
Board of Directors***

REVIEW BY: 09/21/17

POLICY

It is the Policy of Innovative Health Alliance of NY (IHANY) that all Medicare fee-for-service beneficiaries will be notified of IHANY participation in the Medicare Shared Savings Program ("MSSP") and of his/her rights to decline the sharing of claims data with IHANY. Notification shall be carried out in accordance with the Procedure outlined below. IHANY and its ACO Participants and ACO Providers/Suppliers will only use the required CMS poster template and Notice to Patients template letter, without modification, for Poster Notifications and Letter Notifications. All notifications to beneficiaries are subject to CMS' marketing requirements and IHANY Marketing Materials policy.

PROCEDURE

1. Poster Notifications

All ACO Participants must display the CMS Notice to Patients poster template in each of the ACO Provider/Supplier facilities at the point of care indicating their participation in the MSSP, including the beneficiaries' option to decline data sharing with IHANY.

2. Letter Notifications

ACO Participants and ACO Providers/Suppliers who provide primary care services must also make available the CMS Notice to Patients template letter at the point of care to Medicare fee-for-service beneficiaries upon request.

DEFINITIONS

ACO Participant means an individual or group of ACO provider(s)/supplier(s) that is identified by a Medicare-enrolled Tax Identification Number (TIN), that alone or together with one or more

other ACO participants comprise(s) an ACO, and that is included on the required list of ACO participants. {directly from CFR 425.20}

ACO Provider/Supplier means an individual or entity that is a provider or a supplier, that is enrolled in Medicare, that bills for items or services it furnishes to Medicare fee-for-service beneficiaries under a Medicare billing number assigned to the TIN of an ACO participant, and that is included on the required list of ACO providers/suppliers. {directly from CFR 425.20}

CMS Notice to Patients means required language developed by CMS for inclusion on IHANY's Poster Notifications and Letter Notifications for the purpose of notifying Medicare fee-for-service beneficiaries of the IHANY's participation in a MSSP and the beneficiaries' option to decline data sharing with IHANY.

RESPONSIBLE DEPARTMENT

Further guidance concerning this Policy may be obtained from the Integrity and Compliance or Legal Departments.

RELATED PROCEDURES AND OTHER MATERIALS

- 42 C.F.R. § 425.312 Notification to beneficiaries of participation in MSSP
- Market Materials and Activities policy

APPROVALS

Initial Approval: 09/21/2015

Subsequent Review/Revision(s):

11/30/2016 – revision

4/16/2018 – reviewed