

Innovative Health Alliance of New York

Policy No. 09

EFFECTIVE DATE: 9/21/15

POLICY TITLE:

Public Reporting Requirements

REVIEW BY: 9/21/17

POLICY

Innovative Health Alliance of New York (IHANY) will comply with the Centers for Medicare and Medicaid Services ("CMS") requirements for Medicare Shared Savings Program ("MSSP") Accountable Care Organizations ("ACOs") to publicly report certain information related to the operation of the ACO. Public reporting information is subject to CMS MSSP ACO marketing requirements as addressed in *IHANY Policy - Marketing Materials and Activities*.

PROCEDURE

1. IHANY will publicly report and make transparent all required ACO information in accordance with CMS instructions contained in the Medicare Shared Savings Program Public Reporting Guidance available at <http://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/sharedsavingsprogram/Downloads/ACO-Public-Reporting-Guidance.pdf>

2. IHANY will publicly report the following information in accordance with CMS requirements:
 - a. ACO name and location;
 - b. ACO primary contact;
 - c. ACO composition;
 - d. Identification of ACO participant(s);
 - e. Identification of the members of the ACO governing body;
 - f. Identification of associated committees and committee leadership;
 - g. The amount of any shared savings earned or losses incurred;
 - h. The proportion of shared savings invested in resources that support the three-part aim goals of better health for populations, better care for individuals, and lower growth in expenditures, including the proportion distributed among ACO participants; and

- i. Quality performance results.
3. IHANY will report all required information in accordance with the public reporting template and instructions provided by CMS.
4. IHANY will make the required information in #2 publicly available in accordance with CMS timeframes as follows:
 - a. Within 30 calendar days after the start of the IHANY's first performance year;
 - b. Within 30 calendar days of any change in the information reported or as otherwise specified by CMS.
4. Any changes made by IHANY to publicly reported information will be submitted to CMS for review in accordance with IHANY Policy - *Marketing Materials*.
5. IHANY will maintain a dedicated website to report required program information. The website will comply with CMS MSSP marketing requirements and will be submitted for CMS review in accordance with IHANY Policy - *Marketing Materials*.

DEFINITIONS

Accountable Care Organization (ACO) means a legal entity that is recognized and authorized under applicable State, Federal, or Tribal law, is identified by a Taxpayer Identification Number (TIN), and is formed by one or more ACO participants.

ACO Participants 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) and ACO, and that is included on the required list of ACO participants.

ACO Provider(s)/Supplier(s) 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.

POLICY CONTACT

For questions regarding this policy, please contact Chief Operating Officer, 518-701-2193.

RELATED PROCEDURES AND OTHER MATERIALS

- 42 C.F.R. § 425.308 *Public Reporting and Transparency* (MSSP regulations)
- CMS MSSP Public Reporting Guidance at <http://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/sharedsavingsprogram/Downloads/ACO-Public-Reporting-Guidance.pdf>
- *IHANY Policy - Marketing Materials*

APPROVALS

Initial Approval: Board of Directors 9/21/15

Subsequent Review/Revision(s):

4/16/2018 - revision