

TRANSPARENCY AND PUBLIC REPORTING

I. Introduction

CHSPSC ACO 13, LLC (“ACO”) believes transparency in business dealings and care delivery is an important aspect of our participation as an accountable care organization in the Medicare Shared Savings Program (“MSSP”). The ACO also believes public reporting fosters transparency and promotes informed patient choice; engages stakeholders and providers; lowers the costs of care; improves quality; and improves compliance with program requirements. In the interests of transparency, the ACO publicly reports the arrangements and agreements provided in this document.

II. Legal Authority

Pursuant to Section 1899(f) of the Social Security Act (42 U.S.C. § 1395jjj), the Secretary of the Department of Health and Human Services (“HHS”) has made available certain waivers of federal fraud and abuse laws in connection with the operation of ACOs that have entered into a participation agreement, as defined by 42 C.F.R. § 425.20, under the MSSP with the Centers for Medicare & Medicaid Services (“CMS”).

III. Participation in the MSSP

The ACO has entered into a participation agreement with CMS, is in good standing under that participation agreement, and is therefore participating in the MSSP. The ACO began its participation in the MSSP on January 1, 2018 (“ACO Commencement Date”).

IV. Agreement with Koan Health, LLC

Koan Health, LLC (“Koan”) is a population health analytics company that provides data analytic services to providers participating in value-based programs, including the MSSP. The ACO and its affiliates have entered into a Management Services Agreements with Koan whereby beginning on January 1, 2024, Koan will provide access to its data analytics platform as well as analytic support to the ACO to allow it analyze its providers’ performance, costs, and quality. The agreement and relationship between the ACO and Koan does not include any drug or device manufacturers or distributors, or any durable medical equipment or home health suppliers.

The ACO’s Board of Directors (“Board”) is the ACO’s governing body. The Board has made a bona fide determination that agreements with Koan are reasonably related to the purposes of the MSSP because they: (A) promote accountability for quality, cost and overall care for its Medicare patient population; (B) promote the management and coordination of care for Medicare fee-for-service beneficiaries; and (C) encourage investment in infrastructure and redesigned care processes for high quality and efficient service delivery for patients.

The ACO made this bona fide determination and makes this public reporting with the intent that the ACO's relationship and agreements with Koan be protected under the participation waivers described and cited to in Section II of this document.

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V. ACO Participant Agreements

The ACO has entered into Participant Agreements with the providers listed on this website. The Board has made a bona fide determination that agreements with its providers are reasonably related to the purposes of the MSSP because they: (A) promote accountability for quality, cost and overall care for its Medicare patient population; (B) promote the management and coordination of care for Medicare fee-for-service beneficiaries; and (C) encourage investment in infrastructure and redesigned care processes for high quality and efficient service delivery for patients.

To the extent necessary, the ACO made this bona fide determination and makes this public reporting with the intent that the ACO's relationship and agreements with its participants be protected under applicable waivers described and cited to in Section II of this document.

VI. ACO Distribution Plan

The Board has established a methodology by which ACO participants who have signed a Participant Agreement may receive distributions of shared savings, as that term is defined by 42 C.F.R. § 425.20. The Board recorded this methodology in a document called a "Distribution Plan." The Board has made a bona fide determination that the Distribution Plan is reasonably related to the purposes of the MSSP because they: (A) promote accountability for quality, cost and overall care for its Medicare patient population; (B) promote the management and coordination of care for Medicare fee-for-service beneficiaries; and (C) encourage investment in infrastructure and redesigned care processes for high quality and efficient service delivery for patients.

ACO made this bona fide determination and makes this public reporting with the intent that the ACO's Distribution Plan be protected under applicable waivers described and cited to in Section II of this document.

VII. ACO Operations

The ACO, through an affiliated company, and the listed ACO affiliated participating hospital(s), assist with expenses related to personnel, services, goods and facilities to support care coordination, beneficiary and provider engagement. The Board has made a bona fide determination that this arrangement is reasonably related to the purposes of the MSSP because it: (A) promotes accountability for quality, cost and overall care for its Medicare patient population; (B) promotes the management and coordination of care for Medicare fee-for-service beneficiaries; and (C) encourages investment in infrastructure and redesigned care processes for high quality and efficient service delivery for patients.

To the extent necessary, the ACO made this bona fide determination and makes this public reporting with the intent that the ACO's relationship and agreements with its participants be protected under applicable waivers described and cited to in Section II of this document.

VIII. Conclusion

The Board has formally approved the arrangements, agreements, and documents described in this document through the adoption of written resolutions. The Board will regularly review its arrangements and agreements and will update this document as necessary.

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