



magine better health."

POLICY SUBJECT:

ACO Participant Employed Provider/Supplier Update and Maintenance

EFFECTIVE DATE: 12/10/14 To be reviewed every three years by Executive Management

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POLICY

It is the policy of Catholic Health Initiatives ("CHI") that the CHI National Office¹, any Direct Affiliates² and any Subsidiaries³ who participate in an Accountable Care Organization (ACO) [collectively referred to as "CHI Entity(ies)"] comply with regulations issued by the Center for Medicare and Medicaid Services (CMS) related to participation in the Medicare Shared Savings Program (MSSP), including those regulations related to the participant employed provider/supplier update and maintenance.

PROCEDURES

Annual Review Process

CHI Market ACO requires Participant organizations to annually review, and otherwise deemed necessary, the most recent listing of Participant employed providers/suppliers on file with CHI Market ACO.

If Participant organization provider/supplier information is inaccurate it is the responsibility of the Participant organization to report this information to CHI Market ACO within 30 days. Participant organizations should also ensure at this time the provider/supplier information is accurate within the CMS Provider Enrollment, Chain, and Ownership System (PECOS) (B).

PECOS Maintenance

As necessary Participant organizations shall maintain employed provider / supplier information within the CMS Provider Enrollment, Chain, and Ownership System (PECOS).

Notification within 30 Days

CHI Market ACO will document and track all Participant providers for purposes of reporting to CMS and other applicable governing bodies. If Participant organization provider/supplier information changes throughout the calendar year it is the responsibility of the Participant organization to report this information to CHI Market ACO within 30 days.

Additionally Participant organizations should ensure at this time the provider/supplier information is accurate within the CMS Provider Enrollment, Chain, and Ownership System (PECOS) (B).

¹ The CHI National Office includes all locations where CHI National employees are located.

² A Direct Affiliate is any corporation of which CHI is the sole corporate member or sole shareholder.

³ A Subsidiary refers to either an organization, whether nonprofit or for profit, in which a Direct Affiliate holds the power to appoint a majority of the voting Members of the Governing body of such organization or any organization in which a Subsidiary holds such power.



Corporate Responsibility Policy No. 9

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