

**COMMONSPIRIT HEALTH
ACCOUNTABLE CARE ORGANIZATION AND CLINICALLY INTEGRATED NETWORK
ADMINISTRATIVE POLICY**

SUBJECT: Compliance Communication	POLICY NUMBER: Corporate Responsibility PH-002
EFFECTIVE DATE: July 1, 2021	ORIGINAL EFFECTIVE DATE: July 1, 2021

- Accountable Care Organizations (ACO) in the Medicare Shared Savings Program (MSSP)
- Clinically Integrated Networks (CIN)

PURPOSE

The purpose of this policy is to outline CommonSpirit Health’s guidelines regarding the development and distribution of MSSP or CIN Compliance Communications (Compliance Communications), as well as procedures to ensure that all MSSP or CIN Participants, Providers, and Suppliers are consistent with the stated policies.

POLICY

The MSSP or CIN Compliance Officer (Compliance Officer) shall develop and distribute Compliance Communications that support the execution of the MSSP or CIN Compliance Program and educate MSSP or CIN Related Individuals about compliance matters.

AFFECTED AREAS OR DEPARTMENTS

CommonSpirit Health ACOs participating in the Medicare Shared Savings Program
CommonSpirit Health Clinically Integrated Networks

PROCEDURE OR PROCESS

1. Preparation. The Compliance Officer shall be responsible for the development and distribution of Compliance Communications. The Compliance Officer will collaborate with other MSSP or CIN stakeholders to create and distribute the information.
2. Content.
 - A. Compliance Communications shall contain information that highlights the MSSP or CIN Compliance Program and compliance-related issues, such as
 - i. changes to the MSSP or CIN Compliance Program;
 - ii. new or revised regulatory MSSP or CIN program guidance;
 - iii. regulatory or compliance issues identified by the Compliance Officer and/or stakeholders;
 - iv. upcoming compliance training and education programs; and

- v. the MSSP or CIN compliance resources (e.g., links to the on-line version of the Compliance Plan, Code Of Conduct, and Policies and Procedures, and the phone number of the Confidential Compliance Reporting Tool for use in reporting suspected non-compliance.)

3. Distribution.

- A. Compliance Communications shall be made available to all MSSP or CIN Related Individuals, as appropriate. The Compliance Officer shall determine which individuals should be included in the Compliance Communications.
- B. MSSP or CIN may use any appropriate format and distribution method for the Compliance Communications (e.g., paper, e-mail, intranet, and/or inclusion with other newsletters published by the MSSP or CIN).
- C. Archived copies of the Compliance Communications shall be available upon request.

4. Documentation. MSSP or CIN shall maintain in its Compliance Program files copies (electronic or hard copy) of all Compliance Communications issued pursuant to this policy, consistent with its document retention policies but, in no case, for a period of less than ten (10) years as stated in the Population Health Record Retention Policy.

DEFINITIONS

ACO Related Individual: ACO officers, directors, employees, Participant, Provider/Supplier, or any other individual or entity providing functions or services related to ACO Activities.

Code of Conduct: CommonSpirit Health's Our Values in Action.

Compliance Program: The program plan to ensure compliance with applicable federal and state laws and regulations, and to promote ethical and lawful conduct.

Compliance Training: The annual compliance education and training programs.

Confidential Compliance Reporting Tool: A tool by which any individual may confidentially and anonymously report suspected problems related to the ACO or the ACO Compliance Officer.

Medicare Shared Savings Program (MSSP): Medicare Shared Savings Program, established under section 1899 of the Social Security Act.

Policies and Procedures: The MSSP/CIN Compliance Policies and Procedures.

REFERENCES

- National Association of ACOs (NAACOS) ACO Compliance Program Policies and Procedures Manual – MSSP