

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

| | |
|---|---|
| SUBJECT: MSSP Data Submission and Annual Certification | POLICY NUMBER: Corporate Responsibility PH-006 |
| EFFECTIVE DATE: July 1, 2021 | ORIGINAL EFFECTIVE DATE: July 1, 2021 |
| REPLACES: CHI Corporate Responsibility Policy No. 10, Data Submission and Certification to CMS | Dignity Health Policy: Clinical Integration – Medicare Shared Savings Program Data Submission, Quality Reporting, and Certifications |

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

PURPOSE

The purpose is to outline the policies of the MSSP to comply with requirements established by CMS for the submission of quality data, certifications, and other information required of Participants in the MSSP.

POLICY

In accordance to the Medicare Shared Savings Program: Accountable Care Organizations; Final Rule section 425.302, the MSSP shall:

- A. Submit all data and information, including data on measures designated by CMS under section 425.500, in a form and manner specified by CMS.
- B. Certification of data upon submission. With respect to data and information that are generated or submitted by the MSSP, MSSP Participants, MSSP Providers/Suppliers, or other individuals or entities performing functions or services related to MSSP activities, an individual with the authority to legally bind the individual or entity submitting such data or information must certify the accuracy, completeness, and truthfulness of the data and information to the best of his or her knowledge information and belief.
- C. Annually certify. At the end of each performance year, an individual with the legal authority to bind the MSSP must certify to the best of his or her knowledge, information, and belief.

AFFECTED AREAS OR DEPARTMENTS

CommonSpirit Health ACOs participating in the Medicare Shared Savings Program

PROCEDURE OR PROCESS

1. CMS establishes quality performance measures to assess the quality of care furnished by MSSPs participating in the Medicare Shared Savings Program. CMS requires MSSPs to submit quality data on these measures. The MSSP's quality data will be collected and reported in accordance with technical specifications and methods established by CMS which are subject to periodic change.
2. All MSSP Participants and MSSP Providers/Suppliers shall cooperate in the gathering, recording, and submission of complete and accurate quality data, certifications, and other information required by CMS, including providing the MSSP access to Medicare beneficiary medical records data as applicable.
3. The MSSP data and other information shall be submitted through the CMS Web Interface (a website designed for clinical quality measure reporting) or as otherwise directed by CMS.
4. The MSSP data, certifications and other information shall be submitted by the due dates established by CMS.
5. All certifications and other reports submitted to CMS and other government agencies shall be made by an individual with authority to legally bind the MSSP and the ability to certify the accuracy and completeness of the data and information to the best of his or her knowledge and belief.

DEFINITIONS

Beneficiary: Medicare fee-for-service beneficiary attributed to the ACO by CMS.

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

MSSP Activities: Activities related to promoting accountability for the quality, cost, and overall care for a population of attributed Medicare fee-for-service Beneficiaries, including managing and coordinating care, encouraging investment in infrastructure and redesigned care processes for high quality and efficient service delivery; or carrying out any other obligation or duty of the ACO under the Medicare Shared Savings Program.

MSSP Participant: An ACO entity identified by a Medicare-enrolled billing TIN through which one or more providers/suppliers bill Medicare. The providers/suppliers must be included on the list of ACO participants that is required under 42 C.F.R. § 425.118.

MSSP Provider/Supplier: An individual or entity that: (1) is a provider or supplier under Medicare regulations; (2) is enrolled in Medicare; (3) bills for items and services furnished to Medicare fee-for-service beneficiaries during the agreement period under a Medicare billing number assigned to the TIN of an ACO participant; and (4) is included on the list of ACO providers/suppliers that is required under 42 C.F.R. §425.118.

REFERENCES

- National Association of ACOs (NAACOS) ACO Compliance Program Policies and Procedures Manual - MSSP
- MSSP Quality Measures and Reporting Specifications
- CMS Web Interface Webpage

STATUTORY/REGULATORY AUTHORITIES

- 42 C.F.R. §425, Subpart F - Quality Performance Standards and Reporting
- 42 C.F.R §425.302(a). *Requirements for data submission*