

St. Vincent's Accountable Care Organization, LLC

Federal law permits Accountable Care Organizations (ACOs) such as St. Vincent's Accountable Care Organization, LLC (SVACO) to take advantage of a waiver of certain health care fraud and abuse laws in order to permit SVACO to more fully develop programs, initiatives, and arrangements designed to manage, coordinate, and promote accountability for the quality, patient safety, cost, and overall care for patients. In accordance with federal law, SVACO makes information about its arrangements for which waiver protection is sought publicly available.

SVACO was accepted to participate as an ACO in the Medicare Shared Savings Program (MSSP) effective January 1, 2014 and is in good standing under the terms of such participation agreement. The Board of Managers of SVACO has authorized the arrangements described below, has made a bona fide determination that each arrangement is reasonably related to the purposes of the MSSP, and seeks protection for the ACO waiver(s) noted.

Documentation of Quality Standards in Electronic Health Records of Participating Providers

As an ACO participating in the MSSP, SVACO is responsible for coordinating and managing the overall quality and cost of the care provided to its Medicare beneficiaries and other members. This responsibility includes collecting and reporting data on adherence to various quality standards as required by the MSSP and other payer arrangements to which SVACO is a party. SVACO has established a program under which its clinical health partners and other qualified personnel will obtain information that is relevant to quality standards required to be reported under the MSSP or other payer arrangements in which SVACO is participating, and, following SVACO policies, will then chart that information in the electronic health record of the applicable participating provider. This arrangement is within the scope of the MSSP participation waiver and SVACO hereby seeks waiver protection for the arrangement.

Patient Incentives

As an ACO participating in the MSSP, SVACO is responsible for coordinating and managing the overall quality and cost of the care provided to its members.

One of the ways in which SVACO is seeking to achieve these goals is through the provision of non-emergency transportation services. The arrangement is effective July 18, 2018, meets the requirements of the MSSP participation waiver, and is within the scope of the MSSP patient incentive waiver. SVACO hereby seeks waiver protection for this agreement.

Another way in which SVACO is seeking to achieve the goals of the MSSP is through the management of chronic diseases and conditions among its members. One way in which SVACO is seeking to manage the chronic diseases and conditions of its members is by providing blood pressure cuffs and scales to eligible members free of charge in order to promote compliance with treatment regimens for chronic disease management. In addition to meeting the requirements of the MSSP participation waiver, the provision of blood pressure cuffs and scales to beneficiaries to encourage self-monitoring and compliance with symptom management guidelines is within the scope of the MSSP patient incentive waiver. The arrangement is effective August 24, 2016 and SVACO hereby seeks waiver protection for the program.

Lastly, SVACO was a party to a licensing agreement with Am I Hungry? PLLC for rights to use its Am I Hungry?®Mindful Eating Workshop materials for associate-led workshops provided to certain members. The arrangement was approved February 1, 2017 and SVACO sought waiver protection for the program. The program has been discontinued.

Vendor	Services provided	Date of Agreement
Various Vendors	Blood Pressure Cuffs/Scales	8/24/2016
Lyft	Non-emergency transportation	6/25/2018