# **Shared Savings Program Public Reporting Template and Instructions**

#### Overview

This document provides Accountable Care Organizations (ACOs) participating in the Medicare Shared Savings Program (Shared Savings Program) with a public reporting template and instructions on how to complete the template. ACOs participating in the Shared Savings Program are required to publicly report ACO organizational information and performance results on a designated webpage, per 42 CFR § 425.308.

# Shared Savings Program Public Reporting Template

#### **ACO Name and Location**

Renown Accountable Care, LLC Previous Names: R TotalHealth, LLC 1155 Mill Street N14 Reno, NV 89502

### **ACO Primary Contact**

Bethany Sexton 253-212-6928 Bethany.Sexton@renown.org

### **Organizational Information**

#### **ACO Participants:**

ACO Participants	ACO Participant in Joint Venture
Brown Calvanese Cameron Ltd	[Enter "Y" or "N"]
Carson Valley Medical Center Rural Health Clinic	N
Community Care Services, LLC	N
David B Chaffin Md Pc	N
Digestive Health Associates	N
Eastern Sierra Medical Group, LLC	N
Gastroenterology Consultants, Ltd	N
Gomez Kozar Mcelreath and Smith Professional Corporation	N
Hayes & Fyda Md Ltd	N
Hometown Health Management Company	N
James Pappas M.D. Ltd	N
JamesJLynchMDLTC	N
Juell Surgical Associates	N
K Sasse Surgical Associates, Professional Corporation	N
Geriatric Specialty Care of Nevada, Ltd., Dr. Steven Phillips, MD	N
MichaelHSongMDLTD	N
Nevada ENT & Hearing Associates	N
Nevada Neurosurgery LTD	N

Nevada Retina Associates, Jarl C. Nielsen, MD., Ltd	N
Reno Orthopaedic Clinic Inc.	N
Reno Surgical Associates (Vanderclay)	N
Sierra Neurosurgery Group	N
Sierra Pathology Associates, Inc	N
Sierra Regional Spine Institute	N
Stacey Hudson	N
Terry L. McCaskill MD Pc	N
Urology Nevada Ltd Drs. Drew, Freeman, Garey-Sage, Goode, Hald, Ka	N
Washoe Barton Medical Clinic A Nevada Nonprofit Corporation	N

# **ACO Governing Body:**

Member Last Name	Member First Name	Member Title/Position	Member's Voting Power (Expressed as a percentage or number)	Membership Type	ACO Participant Legal Business Name and D/B/A, if applicable
Basho	Shruti	MD	1/11	ACO Participant Representative	Community Care Services, LLC
Bryan	Richard	MD	1/11	ACO Participant Representative	St. Mary's Medical Group
Johnson	Sy	Chief of Staff	1/11	Renown Health Affiliate Representative	Renown Health
Locken	Julie	MD	1/11	ACO Participant Representative	Reno Radiological Associates Chartered
McGraw	Leslie	APRN	1/11	ACO Participant Representative	Carson Valley Medical Center
Mediwala	Rahul	Chief Medical Officer/Board Chair	1/11	ACO Participant Representative	Community Care Services, LLC
Montoya	Melinda	Compliance Officer	0 (non-voting)	Renown Health Representative	Renown Health
Muñoz	Robert		1/11	Medicare Beneficiary Representative	
O'Mara	Timothy	MD	1/11	ACO Participant Representative	Reno Orthopaedic Clinic, Inc.
Park	Susan	MD	1/11	ACO Participant Representative	Hometown Health Management Company
Sexton	Bethany	Chief Transformation Officer	0 (non-voting)	ACO Director	Renown Health
Vagujhelyi	George	MD	1/11	ACO Participant Representative	Digestive Health Associates
Young	Bryan	MD	1/11	ACO Participant Representative	Hometown Health Management Company

# **Key ACO Clinical and Administrative Leadership:**

ACO Executive: Bethany Sexton
Medical Director: Rahul Mediwala
Compliance Officer: Melinda Montoya

#### **Associated Committees and Committee Leadership:**

Committee Name	Committee Leader Name and Position
Executive Committee	Rahul Mediwala
Clinical Integration and Quality Committee	Rahul Mediwala

### Types of ACO Participants, or Combinations of Participants, That Formed the ACO:

- ACO professionals in a group practice arrangement
- Networks of individual practices of ACO professionals
- Critical Access Hospital (CAH) billing under Method II
- Rural Health Clinic (RHC)

### **Shared Savings and Losses**

#### **Amount of Shared Savings/Losses:**

- First Agreement Period
  - o Performance Year 2020, \$3,022,145.35

#### **Shared Savings Distribution:**

- First Agreement Period
  - o Performance Year 2020
    - Proportion invested in infrastructure: 50%
    - Proportion invested in redesigned care processes/resources: 0%
    - Proportion of distribution to ACO participants: 50%

### **Quality Performance Results**

#### **2020 Quality Performance Results:**

ACO Quality Measure Number	Measure Name	Rate	ACO Mean
ACO-8	Risk Standardized, All Condition Readmission	15.36	15.07
ACO-13	Falls: Screening for Future Fall Risk	85.05	84.97
ACO-14	Preventive Care and Screening: Influenza Immunization	87.41	76.03

ACO-17	Preventive Care and Screening: Tobacco Use: Screening and Cessation Intervention	96.67	81.67
ACO-18	Preventive Care and Screening: Screening for Depression and Follow-up Plan	77.57	71.46
ACO-19	Colorectal Cancer Screening	73.98	72.59
ACO-20	Breast Cancer Screening	73.39	74.05
ACO-27	Diabetes Mellitus: Hemoglobin A1c Poor Control	12.39	14.70
ACO-28	Hypertension (HTN): Controlling High Blood Pressure	75.81	72.87
ACO-38	Risk-Standardized Acute Admission Rates for Patients with Multiple Chronic Conditions	53.17	49.50
ACO-40	Depression Remission at Twelve Months	12.15	13.99
ACO-42	Statin Therapy for the Prevention and Treatment of Cardiovascular Disease	84.69	83.37
ACO-43	Ambulatory Sensitive Condition Acute Composite (AHRQ* Prevention Quality Indicator (PQI#91))	1.0	0.95

For Previous Years' Financial and Quality Performance Results, Please Visit data.cms.gov

## **Payment Rule Waivers**

- Skilled Nursing Facility (SNF) 3-Day Rule Waiver:
  - o Our ACO uses the SNF 3-Day Rule Waiver, pursuant to 42 CFR § 425.612.
- Waiver for Payment for Telehealth Services:
  - Our ACO clinicians provide telehealth services using the flexibilities under 42 CFR § 425.612(f) and 42 CFR § 425.613.

#### Fraud and Abuse Waivers

#### ACO Pre-Participation Waiver:

The following information describes each arrangement for which our ACO seeks protection under the ACO Pre-Participation Waiver, including any material amendment or modification to a disclosed arrangement.

[For each arrangement, provide the following information:

- Parties to the arrangement: [Enter parties to the arrangement]
- Date of arrangement: [Enter date of arrangement in the format XX/XX/XXXX]
- Items, services, goods, or facility provided: [Enter items, services, goods, or facility provided]
- Date and nature of any amendments to the arrangement, if applicable: [Enter date in the format XX/XX/XXXX] [Enter the nature of any amendments to the arrangement]

#### ACO Participation Waiver:

The following information describes each arrangement for which our ACO seeks protection under the ACO Participation Waiver, including any material amendment or modification to a disclosed arrangement.

[For each arrangement, provide the following information:

- Parties to the arrangement: [Enter parties to the arrangement]
- Date of arrangement: [Enter date of arrangement in the format XX/XX/XXXX]
- Items, services, goods, or facility provided: [Enter items, services, goods, or facility provided]
- Date and nature of any amendments to the arrangement, if applicable: [Enter date in the format XX/XX/XXXX] [Enter the nature of any amendments to the arrangement]

## Instructions to Complete the Shared Savings Program Public Reporting Template

ACOs must complete all fields in the public reporting template that are included within brackets with placeholder text, using the instructions below, and then post the populated template to their designated public reporting webpages. ACOs should monitor and update their public reporting webpages periodically throughout the year.

ACOs can select one of two ways to post the template to their public reporting webpages: 1) Display all of the information from the completed template on the webpage using existing webpage styles (e.g., fonts, text sizes, headers); or 2) create a PDF of the completed template, without modifying the format, and link to it from your public reporting webpage.

Key reminders before posting:

- Remove the overview and these instructions before displaying template content on the webpage.
- Do not add data that is not required, or omit data, from the template.
- Do not include any taxpayer identification numbers (TINs) on the template.

Note: Select the performance year for which you are entering the information on your public reporting webpage when referencing data in the <u>ACO Management System</u> (ACO-MS). For example, if your ACO is entering and updating information on your public reporting webpage to reflect organizational information and performance results at the start of a new performance year, select this new performance year when referencing data in ACO-MS. This selection can be made under "Program Year."

- 1. **ACO Name and Location:** Enter ACO legal entity name and address as provided on the Agreement Details subtab in ACO-MS.
- 2. ACO Primary Contact: Enter primary contact name, phone number, and email address.
- 3. Organizational Information
  - 3.1 **ACO Participants:** List all ACO participants certified for the performance year by their legal business name (LBN). This data is available on the ACO Participants subtab in ACO-MS, or by downloading the "Participants List" Excel file provided under the Reporting tab in ACO-MS. Add a new row in the table for each ACO participant.
    - If you would also like to include the ACO participant's doing business as (D/B/A) name, enter the D/B/A name in parentheses next to the ACO participant's LBN.
    - If an ACO participant has merged with or been acquired by another ACO participant, only include the acquiring ACO participant on the public reporting webpage.
    - Do not include the ACO participant's TIN.

In addition, identify participants in joint ventures between ACO professionals and hospitals. For reference:

- A "joint venture" is when two or more persons or entities engage in a defined project in which all of the following exists: 1) an express agreement; 2) a common purpose that the parties intend to carry out; 3) shared profits and losses related to the project; and 4) each party has a voice in controlling the project.
- 3.2 **ACO Governing Body:** Enter the most up-to-date information on ACO governing body members' names, positions, voting power, membership types, and associated ACO participant LBNs. Add a new row in the table for each ACO governing body member. For reference:
  - "Member's Voting Power" refers to the number of votes the member has, expressed as a percentage or number.

- "Membership Type" includes ACO participant representative, Medicare beneficiary representative, community stakeholder representative, or other.
- 3.3 **Key ACO Clinical and Administrative Leadership:** Enter the names of the current ACO Executive, Medical Director, Compliance Officer, and Quality Assurance/Improvement Officer. This data is available on the Contacts subtab in ACO-MS.
- 3.4 **Associated Committees and Committee Leadership:** Enter each committee on a separate row that includes the committee name, leader's name, and leader's committee position.
- 3.5 Types of ACO Participants, or Combinations of Participants, That Formed the ACO: List ACO participant types that describe the ACO's composition. ACOs may select one or more of the composition types provided in 42 CFR § 425.102(a). If you select § 425.102(a)(8), then enter the composition type as "Electing Teaching Amendment (ETA) hospital." If you previously entered this information in ACO-MS, the corresponding data is available under the ACO Entity Type section of the Agreement Details subtab.

### 4. Shared Savings and Losses

4.1 **Amount of Shared Savings/Losses:** Enter shared savings/losses (in dollar amount) for all completed performance years by agreement period.

If your ACO participated in Performance Year (PY) 2019 and PY 2019A, enter the net shared savings/losses for the entire year with the label "Performance Year 2019" under all applicable agreement periods and then include the following statement at the end of the section:

"Note: Our ACO participated in multiple performance years during Calendar Year 2019. Shared savings/losses amount reported for Performance Year 2019 therefore represents net shared savings or losses across all performance years in 2019 and is shown under all agreement periods in which the ACO operated during Calendar Year 2019."

The shared savings/losses data is available via the following sources:

- ACO-MS Data Hub: To access the Financial Reconciliation Report, navigate to the Data Hub tab in ACO-MS, select the Program Year in which the data was released, and click on the "Reports" button. For example, for the PY 2020 Financial Reconciliation Report, select "2021" under Program Year. In the Financial Reconciliation Package locate the file(s) with the naming convention of "P.AXXXX.ACO.STLMT". Within the file(s), refer to the Table 3 Shared Savings Losses tab. Refer to the rows titled "Net Earned Performance Payment (\$)" for the shared savings, and "Payment Due to CMS (\$)" for the shared losses.
- **Public Use Files**: Visit <u>data.cms.gov</u> to view the "Performance Year Financial and Quality Results" dataset and refer to the column titled "EarnSaveLoss" for shared savings/losses. Losses are listed as negative values."

Enter "N/A" under this section if your ACO is operating in its first agreement period and has not yet received financial reconciliation results.

4.2 **Shared Savings Distribution:** Enter distribution of shared savings (in percentage) for all completed performance years by agreement period.

If your ACO participated in PY 2019 and PY 2019A, enter the distribution of the net shared savings for the entire year with the label "Performance Year 2019" under all applicable agreement periods and then include the following statement at the end of the section:

"Note: Our ACO participated in multiple performance years during Calendar Year 2019. Distribution of shared savings reported for Performance Year 2019 therefore represents the distribution of the net shared savings across all performance years in 2019 and is shown under all agreement periods in which the ACO operated during Calendar Year 2019."

ACOs that did not earn shared savings or incur losses for a given performance year must indicate "N/A." Also enter "N/A" under this section if your ACO is operating in its first agreement period and has not yet received financial reconciliation results.

- 5. Quality Performance Results: Enter quality results for the most recent performance year available.
  - Do not report quality data for ACO-40 Depression Remission at 12 months.
  - For PY 2020, do not report any Consumer Assessment of Healthcare Providers and Systems (CAHPS®) for ACOs survey data as CMS waived the CAHPS survey requirement for PY 2020 through rulemaking.
  - For PY 2020, do not report quality data for ACO-8 Risk-Standardized, All Condition Readmission and ACO-38 Risk-Standardized Acute Admission Rates for Patients with Multiple Chronic Conditions.

Instead, add the following statements below the quality performance results table: "Please note, the ACO-40 Depression Remission at 12 months quality measure is not included in public reporting due to low sample size. The Centers for Medicare & Medicaid Services (CMS) also waived the requirement for ACOs to field a CAHPS for ACOs survey for PY 2020 through the Physician Fee Schedule Final Rule for Calendar Year 2021. Additionally, CMS reverted ACO-8 Risk-Standardized, All Condition Readmission and ACO-38 Risk-Standardized Acute Admission Rates for Patients with Multiple Chronic Conditions to pay-for-reporting, given the impact of the coronavirus disease 2019 (COVID-19) public health emergency (PHE) on these measures."

Please also note that per CMS policy, you should not publicly share or report cell sizes <11 or any combination of information that would allow cell sizes of <11 to be calculated.

The quality performance results data is available via the following sources:

- ACO-MS Data Hub: To access the *Quality Performance Report*, navigate to the Data Hub tab in ACO-MS, select the Program Year in which the data was released, and click on the "Reports" button. For example, for the PY 2020 Quality Performance Report, select "2021" under Program Year. The report is included within the *Financial Reconciliation Package*. In the *Quality Performance Report*, refer to the "Tables 2-5 Measure Results" tab, which includes the "Measure Name," "Your ACO Performance Rate," and "Current Year Mean Performance Rate." List measures in the same order as presented in the report.
- Public Use Files: Visit <u>data.cms.gov</u> to view the "Performance Year Financial and Quality Results" dataset. In this file, you will find the information to enter for "Rate" by searching for your ACO Name or ACO ID and navigating to the columns titled "ACO#." Please refer to the *Quality Performance Report* in the ACO-MS Data Hub for information to enter for "ACO Mean."

Enter the following if your ACO was not active in the most recent performance year with quality reporting data available: "Our ACO did not participate in the Shared Savings Program in the [20XX] performance year, therefore this section is not applicable at this time."

#### 6. Payment Rule Waivers:

Skilled Nursing Facility (SNF) 3-Day Rule Waiver: Include this section only if your ACO uses
the SNF 3-Day Rule Waiver for the performance year. Refer to the SNF/BIP Information section of
the Agreement Details subtab in ACO-MS. If your ACO has a SNF 3-Day Rule Waiver, then "SNF

3-Day Rule Waiver" should state "Yes."

Waiver for Payment for Telehealth Services: Include this section only if your ACO provides telehealth services for the performance year using the flexibilities under 42 CFR § 425.612(f) and 42 CFR § 425.613. As of January 1, 2020, if at least one clinician in your ACO provides and receives payment for covered telehealth services to prospectively assigned beneficiaries without geographic restriction, then the ACO must publicly report use of telehealth services.

#### 7. Medicare Shared Savings Program Fraud and Abuse Waivers:

Parties seeking to use the ACO Pre-Participation Waiver or the ACO Participation Waiver are required to disclose a description of the arrangements for which waiver protection is sought in accordance with the waiver requirements set forth at 76 Fed Reg. 67,992, 68,000-68,001, 68,004 (Nov. 2, 2011) and in related guidance available at <a href="https://www.cms.gov/Medicare/Fraud-and-Abuse/PhysicianSelfReferral/Downloads/Additional-MSSP-Waiver-Guidance.pdf">https://www.cms.gov/Medicare/Fraud-and-Abuse/PhysicianSelfReferral/Downloads/Additional-MSSP-Waiver-Guidance.pdf</a>.

ACOs may use this section of the public reporting template to fulfill these public disclosure obligations. Alternatively, an ACO may use another public website to disclose the required information so long as the website includes the name of the ACO and other identifying information sufficient to allow individuals conducting an electronic internet search using a widely available search engine to readily locate the website. CMS provides no opinion on whether any public disclosure or the arrangements disclosed satisfy the applicable terms of the Medicare Shared Savings Program Fraud and Abuse Waivers.