



Ascension Care Management Health Partners Indianapolis, LLC Waiver Descriptions

Federal law permits Accountable Care Organizations (ACOs) such as Ascension Care Management Health Partners Indianapolis, LLC (ACM Indianapolis) to take advantage of a waiver of certain health care fraud and abuse laws in order to permit ACM Indianapolis 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, ACM Indianapolis makes information about its arrangements for which waiver protection is sought publicly available.

ACM Indianapolis was accepted to participate as an ACO in the Medicare Shared Savings Program (MSSP) effective January 1, 2015 and is in good standing under the terms of this participation agreement. The Board of Managers 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.

Self-Insured Employer Shared Savings

ACM Indianapolis has entered into participation agreements with certain of its participating providers pursuant to which the providers agree to furnish health care services to beneficiaries of self-insured employers with which ACM Indianapolis has contracted, and, in return for their participation and contribution, the providers are eligible to receive a portion of the compensation earned by ACM Indianapolis as a result of savings generated under such arrangements. Each of the participation agreements with these participating providers, including the shared savings payment arrangements for self-insured employers, is within the scope of the MSSP participation waiver, and waiver protection is hereby sought for each agreement. A list of the providers participating in the foregoing arrangements (the majority which are effective January 1, 2015) is [available here](#).

Ascension Complete Medicare Advantage Shared Savings

ACM Indianapolis has entered into participation agreements with certain of its participating providers pursuant to which the providers agree to furnish health care services to beneficiaries of Ascension Complete Medicare Advantage plans with which ACM Indianapolis has contracted. In addition to payments for covered services provided to covered beneficiaries the providers may qualify for additional incentive payments from Ascension Complete based on an approved incentive payment or shared-risk arrangement approved by ACM Indianapolis' Board of Managers. Each of the participation agreements with these participating providers, including the shared savings payment arrangements is within the scope of the MSSP participation waiver, and waiver protection is hereby sought for each agreement. A list of the providers participating in the foregoing arrangements (most of which are effective January 1, 2021) is [available here](#).

Alliance Network Providers

ACM Indianapolis has formed a network of health care providers organized for the purposes of improving the quality and reducing the costs of health care services provided to certain patient populations. ACM Indianapolis' participating providers include providers of ancillary health care services, such as home infusion therapies, home health services, hospice services, and durable medical equipment services. In order to better coordinate the delivery of these services and improve the quality



and reduce the cost, ACM Indianapolis will designate certain ancillary service providers as “Preferred Ancillary Providers.” ACM Indianapolis will favor Preferred Ancillary Providers when coordinating the delivery of such services and encourage participating providers to refer to Participating Ancillary Providers. Each of the participation agreements with ACM Indianapolis’s Preferred Ancillary Providers is within the scope of the MSSP participation waiver and waiver protection is hereby sought for each agreement. A list of Alliance Network Providers is [available here](#).

Documentation of Quality Standards in Electronic Health Records of Participating Providers

As an ACO participating in the MSSP, ACM Indianapolis 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 ACM Indianapolis is a party. ACM Indianapolis 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 ACM Indianapolis is participating, and, following ACM Indianapolis policies, will then chart that information in the electronic health record of the applicable participating provider. This arrangement began during the 2016 performance year, is within the scope of the MSSP participation waiver and ACM Indianapolis hereby seeks waiver protection for the arrangement. A list of the MSSP providers participating in the foregoing arrangements is [available here](#).

Patient Incentives

As an ACO participating in the MSSP, ACM Indianapolis is responsible for coordinating and managing the overall quality and cost of the care provided to its members. One of the ways in which ACM Indianapolis is seeking to achieve these goals is through the management of chronic diseases and conditions among its members. In furtherance thereof, ACM Indianapolis has engaged at its own cost certain partners to furnish health and disease management services and palliative care services to members. The agreement with the provider furnishing these health and disease management services is effective July 1 2016, meets the requirements of the MSSP participation waiver and is within the scope of the MSSP patient incentive waiver. ACM Indianapolis hereby seeks waiver protection for each agreement. **These programs were discontinued in Performance Year 2020.**

Another way in which ACM Indianapolis 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 June 30, 2016 and ACM Indianapolis hereby seeks waiver protection for the program.

In furtherance of ACM Indianapolis’ purpose of improving quality and reducing the costs of health care services provided to certain members, ACM Indianapolis will provide local non-emergency transportation services to select members. The arrangement was approved by the governing body on September 18, 2018 and it meets the requirements of the MSSP participation waiver, and is within the scope of the MSSP patient incentive waiver. ACM Indianapolis hereby seeks waiver protection for this agreement.



ACM Indianapolis entered into a licensing agreement with Am I Hungry? PLLC for rights to use its Am I Hungry?® Mindful Eating Workshop materials for Company-led workshops provided to certain members. The arrangement was approved in March 2017 and ACM Indianapolis sought waiver protection for the program. **This program has been discontinued.**

Lastly, ACM Indianapolis sought waiver protection to operate a Tobacco Cessation Program for certain members. The Program included Company-led workshops and written educational materials purchased by the Company from the Mayo Clinic Nicotine Dependence Education Program. **The arrangement was approved June 21, 2017 and has been discontinued.**

Current Arrangements	Services provided	Agreement Date
Various Vendors	Blood Pressure Cuffs/Scales	6/30/2016
Lyft	Non-emergency Transportation	6/25/2018