



Ascension Care Management Health Partners Tennessee Waiver Descriptions

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

ACM Tennessee was accepted to participate as an ACO in the Medicare Shared Savings Program (MSSP) effective July 1, 2012 and is in good standing under the terms of such participation agreement. The Board of Directors of ACM Tennessee 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 Tennessee 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 Tennessee has contracted, and, in return for their participation and contribution, the providers are eligible to receive a portion of the compensation earned by ACM Tennessee 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 is [available here](#).

Ascension Complete Medicare Advantage Shared Savings

ACM Tennessee 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 Tennessee 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 Tennessee's Board of Directors. 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 Tennessee 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 Tennessee's 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 Tennessee will designate certain ancillary service providers as “Preferred Ancillary Providers.” ACM Tennessee 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 Tennessee’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 Tennessee 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 Tennessee is a party. ACM Tennessee has established a program under which it’s 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 Tennessee is participating, and, following ACM Tennessee 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 Tennessee 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 Tennessee 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 Tennessee is seeking to achieve these goals is through the management of chronic diseases and conditions among its members. In furtherance thereof, ACM Tennessee has engaged at its own cost certain partners to furnish health and disease management services, home care services and palliative care services to members. In addition to meeting the requirements of the MSSP participation waiver, each of the agreements with the providers furnishing these services is within the scope of the MSSP patient incentive waiver. ACM Tennessee hereby seeks waiver protection for each agreement. **These programs were discontinued in 2020.**

Another way in which ACM Tennessee sought to coordinate and manage the overall quality and cost of the care provided to its members was to engage, at its own cost, certain partners to provide wellness services to members. In addition to meeting the requirements of the MSSP participation waiver, each of the agreements with the providers furnishing these services was within the scope of the MSSP patient incentive waiver. ACM Tennessee sought waiver protection for each agreement. **These wellness services were discontinued December 31, 2018.**

ACM Tennessee also 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 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. ACM Tennessee hereby seeks waiver protection for the program.

In furtherance of ACM Tennessee’s purpose of improving quality and reducing the costs of health care services provided to certain members, ACM Tennessee will provide local non-emergency transportation services to select members. The arrangement is effective August 22, 2018 and it meets the requirements of the MSSP participation waiver, and is within the scope of the MSSP patient incentive waiver. ACM Tennessee hereby seeks waiver protection for this agreement.

Lastly, ACM Tennessee 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. ACM Tennessee hereby sought waiver protection for the program. **This program has been discontinued.**

Current Arrangements	Services provided	Agreement Date
Various Vendors	Blood Pressure Cuffs/Scales	3/15/2016
Lyft	Non-emergency Transportation	6/25/2018

Clinical Management Only Plan

ACM Tennessee has entered into participation agreements with each of the providers listed under the Self-Insured Employer Shared Savings waiver above pursuant to which the providers agree to participate in ACM Tennessee’s Network and are eligible to receive a portion of any savings generated through ACM Tennessee’s arrangements to provide clinical management services to the insureds of applicable self-insured employers or payors. Each of the participation agreements (the majority of which are dated 1/1/2014) is within the scope of the MSSP participation waiver, and waiver protection is hereby sought for each agreement.