



MEDICARE
SHARED SAVINGS
PROGRAM

Webinar

Completing Phase 1 of the Application and Change Request Cycle and Avoiding Common Deficiencies

June 5th, 2024

Medicare Shared Savings Program



Disclaimer

This presentation was current at the time it was published or uploaded onto the web. Medicare policy changes frequently, so links to the source documents have been provided in this document for your reference. This presentation was prepared as a service to the public and is not intended to grant rights or impose obligations. This presentation may contain references or links to statutes, regulations, or other policy materials. The information provided is only intended to be a general summary. It is not intended to take the place of either the written law or regulations. We encourage readers to review the specific statutes, regulations, and other interpretive materials for a full and accurate statement of their contents. This communication was printed, published, or produced and disseminated at U.S. taxpayer expense.



Housekeeping

- Everyone was muted when you joined today's session.
- Put any questions you have during the presentation into the Q&A section of the webinar.
- If time allows, we'll be answering application and change request questions that we received from the registration submissions as well as those you pose today.
 - If you have questions related to quality reporting, please send those questions directly to QPP@cms.hhs.gov.
 - Direct any Accountable Care Organization (ACO)-specific questions or any questions we do not get to today to your ACO Coordinator or the Shared Savings Program Helpdesk sharedsavingsprogram@cms.hhs.gov.



Webinar Presenters



LaShawn Brooks



Emilie Thomas



Faye Starcevich

CMS Center for Medicare (CM)

Performance-Based Payment Policy Group (P3)

Division of ACO Management and Compliance (DAMC)



Webinar Purpose

- We'll help you locate helpful program resources.
- We'll go through how to complete Phase 1 of the Shared Savings Program Application and Change Request Cycle.
- We'll provide key reminders of each application component to help you avoid common deficiencies.
- We'll answer questions about the performance year (PY) 2025 Application and Change Request Cycle.



Resources to Bookmark

Published Resources Available!

- [Application Toolkit](#): Quick access to guidance and other materials relevant to all application types.
- [Application Types & Timeline Webpage](#): Key deadlines and resources to help complete the application, including sample applications.
- [Knowledge Library](#): Access to resources relevant to all Shared Savings Program ACOs in ACO-MS.





Application Reference Manual

All Fee-For-Service-Providers

Home Health Agency (HHA)
Center

Shared Savings Program /
ACOs

Application Toolkit

Application Types & Timeline

About the Program

Contact Information

For ACOs

Application Timeline

Application Reference Manual

The Application Reference Manual is the primary resource for ACOs applying to the Shared Savings Program and guides ACOs through the application process.

In addition to the Application Reference Manual, the resources below will assist ACOs with submitting the different elements of their application(s) and responding to requests for information (RFIs) in ACO-MS.

Application Reference Manual



Shared Savings Program Application Process

- Important Dates
- Initial Application Process in ACO-MS
- Key Reminders to Avoid Common Deficiencies



MEDICARE
SHARED SAVINGS
PROGRAM



Important Dates

1

Submit Phase 1 of the Application

Opens: May 20, 2024
Due: June 17, 2024

2

Respond to Phase 1 RFI-1

Opens: July 11, 2024
Due: Aug. 1, 2024

3

Respond to Phase 1 RFI-2

Opens: Aug. 22, 2024
Due: Sept. 5, 2024

4

Phase 1 Dispositions

Issued: Oct. 17, 2024

5

Submit Phase 2 of the Application

Opens: Oct. 18, 2024
Due: Oct. 29, 2024

6

Respond to Phase 2 RFI

Opens: Nov. 8, 2024
Due: Nov. 18, 2024

7

Final Application Dispositions

Issued: Dec. 5, 2024

8

ACO Signing Event

Opens: Dec. 6, 2024
Due: Dec. 12, 2024



Initial Application Process



Step 1: Complete ACO-MS registration

- Go to [ACO-MS](#) and select **Apply**
- Enter your ACO legal entity information
- Enter the contact information for your ACO's ACO Executive and Primary and Public Contacts
- Review and submit
- Receive a confirmation email

Step 2: Complete and submit the application

- Review the [Application Reference Manual](#) for a January 1, 2025, start date for instructions
- Review [sample applications](#)
- Refer to the initial and renewal/early renewal application checklist in the [Application Reference Manual](#) to complete the application in [ACO-MS](#)

Step 3: Respond to RFIs

- Respond to RFIs by the specified deadlines
- Work with your ACO Coordinator or contact the Shared Savings Program Helpdesk to resolve questions

Step 4: Sign the participation agreement

- Review and certify final materials
- Sign the ACO Participation Agreement

Key Reminders

- Shared Savings Program Application
- Repayment Mechanism
- Banking Information
- ACO Participant List
- SNF 3-Day Rule Waiver



MEDICARE
SHARED SAVINGS
PROGRAM



Shared Savings Program Application

Deficiency Type	How to Avoid
Beneficiary assignment estimate falling under a total of 5,000 beneficiaries.	Ensure the beneficiary assignment estimates are over 5,000 beneficiaries. <ul style="list-style-type: none"> • Add more ACO participants for CMS review if close to or under 5,000 beneficiaries
Ineligible for the track level selected.	Ensure your ACO is eligible for the track and level selected in your application <ul style="list-style-type: none"> • Review the <i>Track Eligibility</i> section of the Application Reference Manual for the options available



Who Needs a Repayment Mechanism?

ACOs that will participate in a two-sided model must establish a repayment mechanism (RM) to assure CMS that they can repay losses for which they may be liable upon reconciliation for each performance year under which they accept performance-based risk (42 CFR § 425.204(f)).



Tip: To better assist ACOs in the creation of a new repayment mechanism, the RM Generator in ACO-MS allows ACOs to input the necessary data to create a draft repayment mechanism for review with their financial institution prior to submitting the draft for CMS review.



Repayment Mechanism

Deficiency Type	How to Avoid
<p>The inception date does not reflect the date the ACO enters into the Medicare Shared Savings Program ACO Participation Agreement with CMS.</p>	<p>Ensure dates are correct.</p> <ul style="list-style-type: none"> The performance year begins on January 1 of the Agreement Period.
<p>The ACO legal entity name (LEN) listed in the RM does not match the ACO LEN in ACO-MS.</p>	<p>Ensure the LEN on the RM documents exactly match what is in ACO-MS.</p>
<p>The duration of the RM does not match program requirements.</p>	<p>Ensure that the RM duration aligns with program requirements.</p> <ul style="list-style-type: none"> The RM must extend one year past the end of your Agreement Period with CMS.
<p>Final, executed RMs are provided prior to CMS authorization.</p>	<p>Ensure that the ACO receives a disposition of <u>Ready for Finalization</u> prior to executing the RM.</p>



Banking Information

For an ACO to finalize its application and receive shared savings payments, the following three documents are required:

1. Electronic Funds Transfer (EFT) Authorization Agreement (Form CMS-588)
 - **ACOs must use the approved Form CMS-588 (OMB No. 0938-0626, Expires 11/2026).**
2. Cover Sheet
3. Supporting financial documentation
 - **The only accepted forms of documentation are a pre-printed, voided check or a signed letter from the financial institution.**



Tip: The [Form CMS-588](#), [cover sheet](#), and ACO Banking Form Instructions are now downloadable in ACO-MS. For initial applicants, the downloadable documents are available in their initial application. For currently participating ACOs, the documents are available under the Documents subtab in the My ACOs section of ACO-MS. Digital signatures are now accepted.



Banking Information

Deficiency Type	How to Avoid
<p>The ACO did not load/re-upload all three required documents:</p> <ol style="list-style-type: none"> 1. Form CMS-588 2. Cover sheet 3. Supporting financial documentation. 	<p>Ensure all three components are completed and uploaded to ACO-MS:</p> <ol style="list-style-type: none"> 1. Form CMS-588 2. Cover sheet 3. Supporting financial documentation.
<p>The ACO legal business name or LEN, address, and/or Taxpayer Identification Number (TIN) do not match ACO-MS.</p>	<p>Ensure the ACO LBN/LEN, address, and TIN on the Form CMS-588 documents exactly match what is in ACO-MS.</p>
<p>The bank account and/or routing number on the Form CMS-588 do not match the submitted supporting financial documents.</p>	<p>Ensure the bank account and routing number aligns with the supporting financial documents.</p>
<p>An unauthorized person signed the Form CMS-588 and did not provide a date.</p>	<p>Ensure the Form CMS-588 is signed and dated by one of the four authorized signatories (ACO Executive, Primary or Secondary Authorized to Sign, or Financial Contact).</p>



Note: If any errors are identified, all three banking information documents must be resubmitted to CMS via ACO-MS.



ACO Participant List

An ACO Participant List identifies all an ACO's participants by their Medicare-enrolled billing TINs.

During Phase 1 of the Shared Savings Program application submission period, initial applicants will submit their ACO Participant List.

- **ACOs must submit the first page and signature page of the signed executed agreement between the ACO and the participant when submitting an “Add Participant” change request.**



Important ACO Participant List Deadlines

Phase 1 RFI-1: July 11–August 1, 2024, at 12:00 p.m. ET

The final opportunity to submit an “Add Participant” change request.

Phase 1 RFI-2: August 22–September 5, 2024, at 12:00 p.m. ET

The final opportunity to do the following:

- Upload executed agreements and merger/acquisition documentation and change the merged/acquired indicator on pending change requests.
- Withdraw or delete ACO participants.



ACO Participant List Considerations

ACO Participant List

- ACO participant list impacts:
 - Revenue status
 - Experience with risk determination
 - Shared Savings Program eligibility
 - Eligibility to receive **advance investment payments**



Resources Available! Refer to the Application Cycle Subtab or download the *Participation Options Report* on the Reporting tab for more information.

Beneficiary Estimates

- Beneficiary estimates are subject to change.
- Both ACO-participant estimates and ACO-level estimates are provided.
- Beneficiary assignment estimates are included for each benchmark year and upcoming performance year.
- Making changes to an ACO's Participant List may impact beneficiary estimates and program eligibility.
- Review your ACO's estimated beneficiary counts to ensure the ACO meets the minimum 5,000 beneficiary requirement.



ACO Participant List

Deficiency Type	How to Avoid
PECOS-Related Deficiencies	Ensure the TIN and LBN verified with the ACO participant match what is in PECOS.
Agreement-Related Deficiencies	<ul style="list-style-type: none"> • Ensure the ACO's LEN and ACO participant's LBN in the ACO Participant Agreement matches what is in ACO-MS. • Ensure both parties have signed the agreement.
Overlap-Related Deficiencies	Communicate with the ACO participant to ensure exclusivity to one Shared Savings Program initiative.



SNF 3-Day Rule Waiver

A Skilled Nursing Facility (SNF) 3-Day Rule Waiver application waives the requirement for a 3-day inpatient hospital stay prior to a Medicare-covered, post-hospital, extended-care service for eligible beneficiaries if certain conditions are met.

Who can apply?

- Only Shared Savings Program ACOs currently participating in or applying to two-sided models can apply (Levels C, D, or E of the BASIC track or the ENHANCED track).

Each SNF 3-Day Rule Waiver application requires submission of at least one SNF affiliate via a change request in ACO-MS.



Important SNF Deadlines

Phase 1 RFI-1: July 11–August 1, 2024, at 12:00 p.m. ET

The final opportunity to do the following:

- Submit an Add SNF Affiliate change request.
- Elect to apply for a SNF 3-Day Rule Waiver.

Phase 1 RFI-2: August 22–September 5, 2024, at 12:00 p.m. ET

The final opportunity to do the following:

- Withdraw a SNF affiliate change request.
- Complete a SNF 3-Day Rule Waiver application.
- Upload fully executed SNF Affiliate Agreements.



SNF Affiliate List

Deficiency Type	How to Avoid
PECOS-Related Deficiencies	Ensure the SNF affiliate's TIN and CMS Certification Number (CCN) verified with the SNF affiliate match exactly what is in PECOS.
Agreement-Related Deficiencies	<ul style="list-style-type: none"> • Ensure the ACO's LEN and SNF TIN LBN in the SNF Affiliate Agreement matches what is in ACO-MS. • Ensure both parties have signed the agreement.
Star Rating-Related Deficiencies	Ensure the eligible SNF affiliate has a rating of at least 3 stars at the time of CMS' final check.



Requests for Information (RFIs)

- RFI dates for the PY 2025 Application and Change Request Cycle are as follows:
 - **Phase 1**
 - RFI-1: July 11–August 1, 2024, at 12:00 p.m. ET
 - RFI-2: August 22–September 5, 2024, at 12:00 p.m. ET
 - **Phase 2**
 - RFI November 8–18, 2024, at 12:00 p.m. ET
- Purpose of RFIs:
 - RFIs provide ACOs with detailed information and an opportunity to correct deficiencies and/or make updates or modifications to the ACO application or change requests.
- How to Address an RFI:
 - RFIs are issued in ACO-MS, and ACOs must respond to RFIs in ACO-MS.



Tips for Application Success

- ✓ Act early and do not wait until the deadlines.
- ✓ Review program guidance for assistance in understanding program requirements.
- ✓ Become familiar with participation options.
- ✓ Establish a legal entity and organizational structure.
- ✓ Establish a governing body that meets program requirements.
- ✓ Establish a compliance plan and procedures that meet program requirements.
- ✓ Reach out to providers, suppliers, and SNF affiliates with whom your ACO is partnering or intends to partner with.
- ✓ Collect ACO participant TINs, PTANs, and LBNs.
- ✓ Collect SNF affiliate TINs, CCNs, and TIN LBNs.
- ✓ Create ACO Participant and SNF Affiliate Agreements that satisfy program requirements.
- ✓ Prepare to establish a repayment mechanism if applying or transitioning to Levels C, D, or E of the BASIC track, or the ENHANCED track.
- ✓ Establish a bank account with a financial institution.
- ✓ Verify that all information is entered accurately upon first submission.
- ✓ Attend office hour calls for important information.
- ✓ Utilize the Shared Savings Program Helpdesk for questions.
 - Renewing applicants can also reach out to their ACO Coordinator.
- ✓ Safeguard user IDs and passwords.
- ✓ Ensure accurate and up-to-date contact information

Question & Answer Session

Additional questions can be sent to your ACO Coordinator or the Shared Savings Program Helpdesk:

sharedsavingsprogram@cms.hhs.gov.



MEDICARE
SHARED SAVINGS
PROGRAM

Question 1 & Answer Session

A large, yellow-outlined speech bubble with a tail pointing towards the bottom left, containing the text of the question.

Question 1:
How can ACOs match NPIs
to new TINs in PECOS?



Question 2 & Answer Session

Question 2:
Can an ACO withdraw an
ACO participant after
submitting them during the
Phase 1 submission period?



Question 3 & Answer Session

Question 3:
How does an ACO know
what track and level to select
in an application?



Question 4 & Answer Session

Question 4:
Do ACOs need to submit all
ACO Participant Agreements
during the application
process?



Question 5 & Answer Session

Question 5:

What legal entity information is required for an ACO? If an incorrect name or Tax ID was used during registration, can we update this information in our existing application?



Question 6 & Answer Session

Question 6:

What banking information and repayment mechanism documentation is needed for Phase 1 of the application?



Question 7 & Answer Session

Question 7:
How does the Shared Savings Program application process work in conjunction with the ACO PC Flex Model?



Question 8 & Answer Session

Question 8:
When is the final opportunity
to withdraw a renewal
application as an Early
Renewal Applicant?



Question 9 & Answer Session

Question 9:
Can I use my current ACO
Participant Agreements when
carrying forward an ACO
participant into our new
agreement period?



Question 10 & Answer Session

Question 10:
What changes have been
made this year to the
application?





Upcoming Webinars

SAVE THE DATE!

Upcoming CMS Shared Savings Program Webinars



Making the Most of Phase 1 RFI-1

Thursday, July 18th, 1:00-2:30 p.m. ET



Finalizing Phase 1 & Preparing for Phase 2

Wednesday, August 28th, 1:00-2:30 p.m. ET

Mark your calendars for these events—more details to come!

Post-Attendee Survey
