

# Innovative Health Alliance of New York

**Policy No. 05**

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**EFFECTIVE DATE: 9/21/15**

**POLICY TITLE:**

***Compliance Training***

**REVIEW BY: 9/21/17**

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**POLICY**

Innovative Health Alliance of New York (IHANY) will comply with Medicare Shared Savings Program ("MSSP") requirements to provide compliance training for IHANY, ACO Participants and ACO Providers/Suppliers in accordance with Centers for Medicare and Medicaid Services ("CMS") regulations.

**PROCEDURE**

1. IHANY will provide compliance training to ACO Participants and ACO Providers/Suppliers designed to achieve the following objectives:
  - a. Emphasize the commitment of IHANY to conduct its activities in compliance with all laws and regulations and with the highest ethical and professional standards.
  - b. Promote awareness and understanding of compliance requirements specific to IHANY's participation in the MSSP.
  - c. Provide information regarding IHANY's Compliance Program, including resources available to answer questions and to report issues and concerns, including suspected fraud, waste, and abuse or violations of laws and regulations.
  - d. The obligation of all individuals to support the IHANY Compliance Program.
2. Compliance training will be provided to ACO Participants and ACO Providers/Suppliers within the first 90 days following execution of an agreement to participate in IHANY and on an annual basis thereafter.
3. IHANY may provide additional compliance training to ACO Participants and ACO Providers/Suppliers in response to specific issues identified as part of IHANY's operating activities, compliance issues identified in industry, or legal and regulatory changes.
4. To document adherence to CMS' MSSP ACO compliance training requirements, all ACO Participants and ACO Providers/Suppliers will be required to complete and return to IHANY an annual attestation that includes acknowledgement and completion of IHANY's compliance training requirements on behalf of their organization.

5. IHANY will maintain documentation evidencing completion of compliance training requirements, including compliance training materials and ACO Participant and ACO Provider/Supplier compliance training attestations in accordance with IHANY's record retention policies.

## **DEFINITIONS**

**Accountable Care Organization ("ACO")** means a legal entity that is recognized and authorized under applicable State, Federal, or Tribal law, is identified by a Taxpayer Identification Number (TIN), and is formed by one or more ACO participants.

**ACO Participant(s)** means an individual or group of ACO provider(s)/supplier(s) that is identified by a Medicare-enrolled Tax Identification Number (TIN), that alone or together with one or more other ACO participants comprise(s) and ACO, and that is included on the required list of ACO participants.

**ACO Provider/Supplier(s)** means an individual or entity that is a provider or a supplier, which is enrolled in Medicare, that bills for items or services it furnishes to Medicare fee-for-service beneficiaries under a Medicare billing number assigned to the TIN of an ACO participant, and that is included on the required list of ACO providers/suppliers.

## **POLICY CONTACT**

For questions regarding this policy, please contact IHANY's Compliance Officer at (518) 243-4404.

## **RELATED PROCEDURES AND OTHER MATERIALS**

- 42 C.F.R § 425.30(a)(4). *Compliance plan*

## **APPROVALS**

**Initial Approval:** Board of Directors 9/21/15

**Subsequent Review/Revision(s):**