



Effective Date: 12/16/19

Innovative Health Alliance of New York, LLC
Category: MSSP Compliance
Beneficiary Notifications

POLICY

It is the Policy of Innovative Health Alliance of New York, LLC ("IHANY") that all Medicare fee-for-service beneficiaries will be notified of IHANY's participation in the Medicare Shared Savings Program ("MSSP"), of his/her rights to decline the sharing of claims data with IHANY, his/her ability to identify or change voluntary alignment designations, and IHANY's participation in beneficiary incentive programs, where applicable. Notification shall be carried out in accordance with the Procedure outlined below. IHANY and its ACO Participants and ACO Providers/Suppliers will only use the required CMS poster template and Notice to Patients template letter, without modification, for Poster Notifications and Letter Notifications. All notifications to beneficiaries are subject to CMS' marketing requirements and IHANY's policy regarding Marketing Materials and Activities.

DEFINITIONS

ACO Participant 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) an ACO, and that is included on the required list of ACO participants. {Directly from CFR 425.20}

ACO Provider/Supplier means an individual or entity that is a provider or a supplier that 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. {Directly from CFR 425.20}

CMS Notice to Patients means required language developed by CMS for inclusion on IHANY's Poster Notifications and Letter Notifications for the purpose of notifying Medicare fee-for-service beneficiaries of IHANY's participation in a MSSP and the beneficiaries' option to decline data sharing with IHANY.

RESPONSIBLE DEPARTMENT

For questions regarding this policy, please contact Laurel Baum, Chief Integrity & Compliance Officer at 518-525-1378 or Laurel.E.Baum@trinity-health.org

PROCEDURE

1. Poster Notifications

All ACO Participants must display the CMS Notice to Patients poster template in each of the ACO Provider/Supplier facilities at the point of care indicating their participation in the MSSP.

2. Letter Notifications

ACO Participants and ACO Providers/Suppliers who provide primary care services must also provide to beneficiaries the CMS Notice to Patients template letter prior to or at their first primary care visit of each performance year. ACO Participants and ACO Providers/Suppliers are required to document the beneficiary's receipt of the letter notification in either the beneficiary's medical record or other readily available source. See Exhibit A for a list of applicable CMS Primary Care Codes.

RELATED PROCEDURES AND OTHER MATERIALS

- 42 C.F.R. § 425.312 *Notification to beneficiaries of participation in MSSP*
- Marketing Materials and Activities policy

Approving Official: IHANY Board		Effective Date: 12/16/2019
Key Sponsor: IHANY Compliance & Integrity Officer		Original Date: 9/21/15 Reviewed/Revised Date: 11/30/2016 – revision 4/16/2018 – reviewed *Reviewed, No Revisions **Revised without Full Review
Reviewed By: SPHP Integrity & Compliance; Trinity Health Integrity & Compliance; IHANY COO		
Search Terms: beneficiary notification, mssp,		
Replaces: IHANY-Beneficiary Notification Policy, 4/16/2018		