

Accountable Care Organization (ACO) Compliance Education: BJC West

EXCLUSIONS

- All BJC East Health Service Organizations
- All Saint Luke's Health System member-hospitals
- Saint Luke's Home Health and Hospice
- The BJC HealthCare ACO, LLC (operating in the BJC Health East Region)
- Any other BJC Health-member Health Service Organization or affiliated institution or provider not participating in the Medicare Shared Savings Program through the BJC Saint Luke's ACO

POLICY STATEMENT

The purpose of this policy is to describe the process by which the BJC SAINT LUKE'S ACO (the "ACO") provides appropriate compliance education to its members.

The ACO is obligated to provide all of its Participants appropriate compliance education, as prescribed by the Centers for Medicare and Medicaid Services ("CMS") under the Medicare Shared Savings Program ("MSSP"). The MSSP requires all participating ACOs to develop and implement a Compliance Plan and related Policies ("the Plan and Policies"), and a Compliance Training Program for all ACO Participants. The ACO's Plan and Policies, with support from the ACO's Compliance Officer and/or Program Director, constitute the BJC SAINT LUKE'S ACO Compliance Training Program. The training program includes, but is not limited to, the mechanism by which compliance concerns should be reported, the process for allowing beneficiaries to opt out of data sharing, how to access the ACO's policies and procedures, and the importance of adhering to the requirements set forth by CMS regarding marketing materials.

PROCEDURE

The ACO Compliance Officer and ACO Program Director are responsible for disseminating the Plan and Policies to all ACO Participants and their respective employees and agents and providing ongoing support in understanding and applying the Plans and Policies in the course of ACO-related activities. The ACO Compliance Officer and ACO President will jointly issue annually to all ACO Participants a notice of the ACO Compliance Plan and Policies, where and how to access related documents, and how to submit related questions or comments, or report compliance concerns, to the ACO Compliance Officer. ACO Participants and their employees and agents are responsible for reviewing, understanding, and adhering to the Plan and Policies, and/or contacting the Compliance Officer or Program Director with any questions or concerns.

Any exception, change or deviation from this Policy must be reviewed and approved by the ACO Compliance Officer. The ACO Compliance Officer is available to answer any questions and to provide assistance and advice to ACO participants concerning this Policy.

DEFINITIONS

N/A

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RELATED POLICIES, STANDARDS, DOCUMENTS

1. Accountable Care Organization (ACO) Compliance Plan: BJC West
2. The SAINT LUKE'S ACO Compliance Policies
 - a. Accountable Care Organization (ACO) Conflict of Interest Policy: BJC West
 - b. Accountable Care Organization (ACO) MSSP Waiver Policy (Medicare Shared Savings Program): BJC West
 - c. Accountable Care Organization (ACO) Medicare Shared Savings Program (MSSP) Data Sharing for Internal Use: BJC West
 - d. Accountable Care Organization (ACO) Marketing: BJC West
 - e. Accountable Care Organization (ACO) Retention of Records Policy: BJC West
3. [BJC Health Compliance Program - Code of Conduct, Program Elements and Compliance Handbook: Enterprise](#)

REFERENCES

1. 42 CFR 425.300—Compliance Plan, available here: <https://www.ecfr.gov/current/title-42/chapter-IV/subchapter-B/part-425/subpart-D/section-425.300>.

APPENDIX

N/A