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# Webinar

## Preparing for the Application and Change Request Cycle

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May 9, 2024



Medicare Shared Savings Program



# Disclaimer

This webinar was prepared for informational purposes only and isn't intended to grant rights or impose obligations. The information provided is only intended to be a general summary. It isn't intended to take the place of the written law, including the regulations. We encourage readers to review the specific statutes, regulations, and other interpretive materials for a full and accurate statement of their contents.



# Housekeeping

- Everyone was muted when you joined today's session.
- This session is being recorded and will be posted to the Shared Savings Program website
- 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](mailto:QPP@cms.hhs.gov).
  - Any ACO-specific questions will not be answered during today's webinar and should be directed to your ACO Coordinator.
- At the conclusion of today's webinar, there will be a survey and we appreciate your feedback.

A blue circular icon containing a white magnifying glass, positioned to the left of the main title.

# Webinar Presenters



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# Webinar Purpose

- The purpose of today's presentation is to help you locate helpful resources and prepare for the Performance Year (PY) 2025 Application and Change Request (CR) Cycle.
- We'll go through how to complete a renewal application and key reminders for those ACOs needing to renew their Shared Savings Program Participation.
- We'll go through how currently participating ACOs can manage program participation in the Shared Savings Program within their current agreement period during the PY 2025 cycle.
- Answer questions about the upcoming PY 2025 Application and Change Request Cycle.

# Shared Savings Program Application Process

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- Important Dates
- Renewal Application Process in ACO-MS
- Actions Available during the Application Cycle



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# 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



# Renewal Application Process



## Step 1: Complete ACO-MS Registration

- Log into [ACO-MS](#)
- Navigate to the Agreement Details subtab
- Select the “Apply to Renew” or “Apply to Early Renew” button
- Confirm ACO’s intention to apply for new agreement period
- Review and submit

## Step 2: Complete & submit the application

- Review the [Application Reference Manual](#) for a January 1, 2025 start date for instructions
- Review [sample applications](#)
- Refer to the 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 specified deadlines
- Work with your ACO Coordinator to resolve questions

## Step 4: Sign the participation agreement

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

# Key Reminders for Renewing ACOs

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- Repayment Mechanism
- Banking Information
- ACO Participant List
- SNF Affiliate List



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# Who Needs a Repayment Mechanism?

- ACOs that will participate in a two-sided model must establish a repayment mechanism 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:** In order to better assist ACOs in the creation of a new repayment mechanism arrangements, an “RM Generator” has been created within ACO-MS. The generator will allow 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.



**Published Resource Available!** Refer to the [Repayment Mechanism Arrangements Guidance](#) for more information.



# Repayment Mechanism

## Option 1: Establish a New Repayment Mechanism for the New Agreement Period

- Utilize new Repayment Mechanism Generator in ACO-MS.
- Submit draft documentation of full repayment mechanism documentation after discussing with financial institution during Phase 1 Submission period in ACO-MS.
- Reference Section 2 of Repayment Mechanism Arrangements Guidance and [Appendix E: New Repayment Mechanism Checklist](#).

## Option 2: Establish a New Repayment Mechanism for Both the Current and New Agreement Periods

- Ensure specific requirements are met concerning duration dates and required repayment mechanism amounts.
- ACOs are encouraged to contact the Shared Savings Program Helpdesk to discuss their specific situation if electing the option.

## Option 3: Amend an Existing Repayment Mechanism

- Submit draft amendment or rider during Phase 1 Submission period in ACO-MS.
- Reference Section 4 of Repayment Mechanism Arrangements Guidance [Appendix F: Renewing ACO Repayment Mechanism Checklist](#).



# Banking Information

- ACOs must use the approved [Form CMS-588](#) (OMB No. 0938-0626 Expires 11/2026).

***Note: Form CMS-588 has been updated in 2024***

- ACOs can now download [Form CMS-588](#) and [cover sheet](#) from [ACO-MS](#).
- ACOs should review the account information on file before July 31, 2024 to ensure information is up to date.
- If updating the banking information as part of the renewal application, ACOs must upload all three required documents to move forward with the application (Form CMS-588, cover sheet, and supporting financial documentation).
- **New:** ACOs can now digitally sign their Form CMS-588.



# ACO Participant List

- In the upcoming change request cycle, beginning May 20, 2024, ACOs can modify their ACO's Participant List.
- Renewal/early renewal applicants entering into a new Shared Savings Program agreement period are **not** required to submit a newly executed agreement if the previously submitted agreement still meets program requirements.
  - If a Currently Participating ACO makes a change to their current agreement, they are not required to submit a new or amended "sample" agreement when submitting a renewal application for PY25.
  - For newly added ACO participant change requests, CMS must receive a copy of each fully executed agreement (first page and signature page) and any amendments (if applicable).
- When a renewal/early renewal applicant selects an ACO participant that the ACO wishes to carry over into the new agreement period, the ACO will have the option in the change request to either:
  - Submit a newly executed ACO Participant Agreement, or
  - Have ACO-MS carry forward the previously submitted executed agreement associated with the ACO participant.



# ACO Participant List Considerations

## ACO Participant List

- Making changes to the ACO's Participant List may impact beneficiary estimates and program eligibility
- ACO Participant List impacts:
  - Revenue status
  - Experience with risk determination
  - Eligibility to receive **Advance Investment Payments (AIP)**

## Beneficiary Assignment Estimates

- Beneficiary estimates are subject to change
- Estimates provided at the individual ACO participant and ACO level (combined across ACO participants)
- Estimates include each benchmark year and upcoming performance year
- Review your ACO's estimated beneficiary counts to ensure the ACO meets the minimum 5,000 beneficiary requirement.



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



# SNF Affiliate List

- Like the ACO Participant List:
  - Renewal/early renewal applicants **are not required** to submit a newly executed agreement if the previously submitted agreement still meets program requirements.
- When a renewal/early renewal applicant selects a SNF affiliate that the ACO wishes to carry over into the new agreement period, the ACO will have the option in the change request to either:
  - Submit a newly executed SNF Affiliate Agreement, or
  - Have ACO-MS carry forward the previously submitted executed agreement associated with the SNF affiliate.
- Reminder: SNF affiliate change requests (including renewal change requests) fall under the application and change request deadlines
- If a TIN/CCN combination has changed, an ACO must submit a new Add SNF Affiliate change request



# Tips for Application Success

- ✓ Act early and do not wait until the deadlines.
- ✓ 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, CMS Certification Numbers (CCNs), and TIN LBNs
- ✓ Create ACO Participant Agreements and SNF Affiliate Agreements that satisfy program requirements.
- ✓ Prepare to establish and/or update a repayment mechanism if applying or transitioning to Levels C, D, or E of the BASIC track, or the ENHANCED track.
- ✓ Attend office hour calls for important information.
- ✓ Utilize your ACO Coordinator for questions
- ✓ Safeguard user IDs and passwords.
- ✓ Ensure contact information is accurate and up-to-date
- ✓ Verify that all information is entered accurately upon first submission.
- ✓ Ensure the banking account with a financial institution is up-to-date using the new Form CMS-588 No. 0938-0626 which expires 11/2026.



# Considerations for Early Renewing ACOs

- An Early Renewing ACO becomes a renewal applicant and is subject to the application and change request cycle deadlines.
- Renewal change requests are subject to the application and change request deadlines and would not fall under compliance monitoring schedules.
  - ACO Participant List
  - SNF Affiliate List
- The current agreement period will be terminated on December 31<sup>st</sup>.
- Changes to components are submitted within a renewal application.
  - Banking Information
  - Repayment Mechanism
  - Governing Body
  - Organizational Chart



# Managing Program Participation Resources

**All Fee-For-Service-Providers**

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Home Health Agency (HHA) Center

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Shared Savings Program / ACOs

Application Toolkit

Application Types & Timeline

About the Program

Contact Information

For ACOs

For Providers

In the News

Program Data

Program Guidance & Specifications

Program Statutes & Regulations

**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**

**Managing Program Participation Guidance**

The Managing Program Participation Guidance is the primary resource for ACOs participating in the Shared Savings Program. This document provides information on maintaining program participation for your ACOs currently in the program. For more information, please refer to the Key Change Request Actions and Deadlines.

**Managing Program Participation Guidance**

**ACO-MS Tip Sheets**

ACO-MS is the system used to apply to the Shared Savings Program. Below are tip sheets that support the application process.

- [How to Complete ACO-MS Registration](#)
- [How to Manage ACO-MS User Access & Contacts](#)
- [How to Use the Application Cycle Subtab and Participation Options Report in ACO-MS](#)
- [Requests for Information in ACO-MS](#)
- [Adding ACO Participants & SNF Affiliates in ACO-MS](#)
- [Beneficiary Assignment Estimate in ACO-MS](#)
- [How to Manage Program Participation in ACO-MS](#)

**ACO-MS**

Medicare Shared Savings Program | Webinar

18

# Actions Available for Currently Participating ACOs

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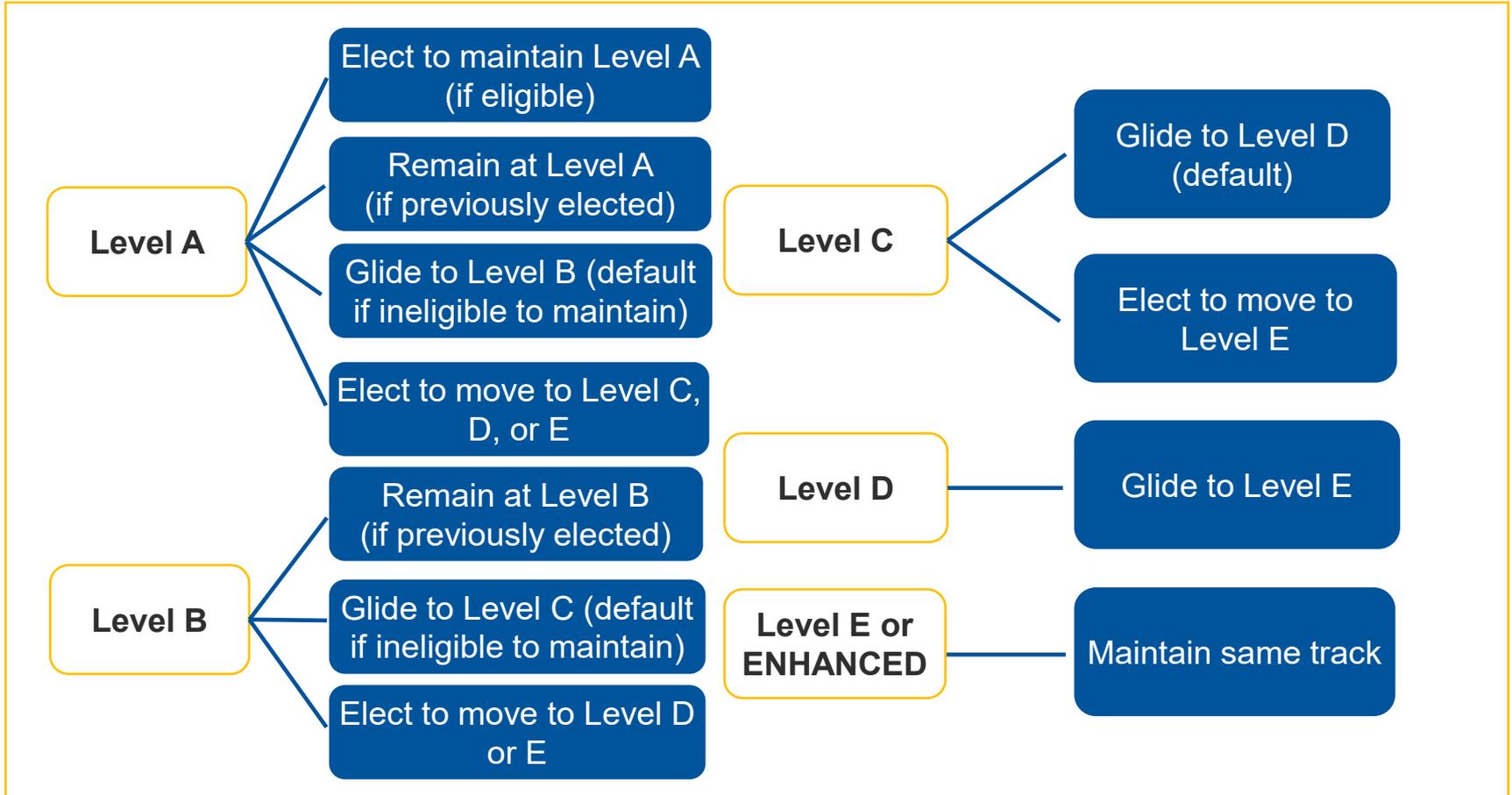
- Submit a Participation Options change request
- Apply for a SNF 3-Day Rule Waiver
- Apply for a BIP
- Modify a SNF Affiliate List
- Modify an ACO Participant List



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# Participation Options Change Requests





# SNF 3-Day Rule Waiver and BIP

## Skilled Nursing Facility (SNF) 3-Day Rule Waiver

- ACOs currently participating in or transitioning to a two-sided risk model (Levels C, D, or E of the BASIC track, or the ENHANCED track) may apply for a SNF 3-Day Rule Waiver



### To apply:

- Complete a separate application during Phase 1
- Elect to apply via the Agreement Details subtab

## Beneficiary Incentive Program

- ACOs currently participating in or transitioning to a two-sided risk model (Levels C, D, or E of the BASIC track, or the ENHANCED track) may apply for a Beneficiary Incentive Program (BIP)



### To apply:

- Complete a separate application during Phase 2
- Elect to apply via the Agreement Details subtab



# ACO Participant List and SNF Affiliate List

## Actions Available

- Add ACO Participants to their ACO Participant List
- Delete or withdraw ACO Participants from their ACO Participant List
- Add SNF Affiliates
  - SNF affiliates can be deleted at any time during the calendar year

## Potential Impact

**ACOs Receiving Advance Investment Payments:** Adding or deleting ACO participants may affect an ACO's revenue status and experience with risk determination. ACOs must be low revenue and inexperienced with risk to continue receiving advance investment payments.



**Published Resource Available!** Refer to the [AIP Guidance](#) for more information on AIP Eligibility requirements.

- Refer to the Application Cycle Subtab or download the *Participation Options Report* on the Reporting tab to view updated AIP eligibility



# 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 located in ACO-MS.

# Question & Answer Session

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Additional questions can be sent to your ACO Coordinator or to the Shared Savings Program Helpdesk:  
[sharesavingsprogram@cms.hhs.gov](mailto:sharesavingsprogram@cms.hhs.gov).



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# Upcoming Webinars

## SAVE THE DATE!

### Upcoming CMS Shared Savings Program Webinars



#### **Completing Phase 1 of the Application & Avoiding Common Deficiencies**

Wednesday, June 5<sup>th</sup>, 1:00-2:30 p.m. ET



#### **Making the Most of the Phase 1 RFI-1**

Thursday, July 18<sup>th</sup>, 1:00-2:30 p.m. ET



#### **Finalizing Phase 1 & Preparing for Phase 2**

Wednesday, August 28<sup>th</sup>, 1:00-2:30 p.m. ET

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

# Post-Attendee Survey

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