



**Title:** Prohibition of Certain Beneficiary Inducements for Medicare Shared Savings Program

**Approved by:** Scripps Accountable Care, LLC  
Management Board

**Approval Date:** 1/20/2017

## **PURPOSE**

The following policy applies to the Scripps' Accountable Care Organization Medicare Shared Savings Program

## **DEFINITION**

1. ACO participant. Means an individual or group of ACO provider(s)/supplier(s), that is identified by a Medicare-enrolled TIN, that alone or together with one or more other ACO participants comprise(s) an ACO, and that is included on the list of ACO participants
2. ACO provider/supplier. Means an individual or entity that
  - a. Is a provider or a supplier
  - b. Is enrolled in Medicare;
  - c. Bills for items and services it furnishes to Medicare fee-for-service beneficiaries under a Medicare billing number assigned to the TIN of an ACO participant in accordance with applicable Medicare regulations; and
  - d. Is included on the list of ACO providers/suppliers that is required

## **PROCEDURE**

1. The Scripps ACO, its ACO participants, and ACO provider/suppliers, and other individuals or entities performing functions or services related to ACO activities will not provide gifts or other remunerations to beneficiaries as inducements for receiving items or services from, or remaining in, the Scripps ACO, or with an ACO provider/supplier in the ACO.
2. Consistent with program rules, the Scripps ACO, its ACO participants, and ACO provider/suppliers, and other individuals or entities performing functions or services related to ACO activities may provide in-kind items or services to beneficiaries if there is a reasonable connection between those items and services and the medical care of the beneficiary.

These in-kind items or services will be related to preventative care or advance a clinical goal for the beneficiary such as adherence to a treatment regime, adherence to a drug regimen, adherence to a follow-up care plan, or management of chronic care or condition.