

Scripps Accountable Care Organization, LLC Standard Operating Procedure

Title: Maintenance of Provider Enrollment Data for Medicare Shared Savings Program

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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. <u>ACO participant.</u> 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 professional. Means an ACO provider/supplier who is either of the following:
 - a. A physician legally authorized to practice medicine and surgery by the State in which he performs such function or action
 - b. A practitioner who is one of the following:
 - i. A physician assistant
 - ii. A nurse practitioner
 - iii. A clinical nurse specialist
- 3. ACO provider/supplier. Means an individual or entity that
 - a. Is a provider or a supplier
 - b. Is enrolled in Medicare;
 - 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
- 4. <u>PECOS</u>. The Provider Enrollment, Chain and Ownership System; namely, Medicare's online provider enrollment system.

PROCEDURE

- 1. Section 5.9.3.f of the Scripps Participant Agreement states,
 - 5.9.3 <u>Professional Standing</u>. ACO Participant shall promptly notify Scripps ACO and its designees of any material change or challenge to the standing of ACO Participant or any of its practitioners in the medical profession or community. Toward this end, and without intending



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to limit ACO Participant's obligations, ACO Participant shall promptly notify Scripps ACO and its designees of any of the following events or occurrences:

- (f) any change in the information submitted by ACO Participant or any of its practitioners to Scripps ACO in an application, or otherwise contained in any credentialing record maintained by Scripps ACO, PECOS, or CMS, including any change in the legal name, d/b/a or assumed name, TIN, NPI, address, telephone number, or affiliation of ACO Participant or any of its practitioners;
- 2. ACO providers will update their provider enrollment information, including the addition and deletion of ACO professionals and ACO provider/suppliers billing through the Tax Identification Number (TIN) of the ACO participant, in the Centers for Medicare and Medicaid Services (CMS) online *Provider Enrollment, Chain and Ownership System* (PECOS).
- 3. ACO participants will submit changes on a timely basis and in accordance with Medicare program requirements.
- 4. ACO participants will notify Scripps ACO within 30 days of enacting any changes in their Medicare enrollment data.
- 5. Annually, Scripps ACO will request that the ACO participant review and certify the accuracy of the data in PECOS. During this annual certification process, the ACO participant will identify any discrepancies in their PECOS data, notify the ACO of any pending PECOS updates, and enact those updates in PECOS in a timely manner.
- 6. If the ACO participant fails to comply with Scripps ACO's *Maintenance of Provider Enrollment Data Policy*, the ACO will proceed with the remedial measure outlined in the Scripps ACO Participant Agreement.