

BJC HEALTHCARE ACCOUNTABLE CARE ORGANIZATION POLICY

APPLIES TO: BJC HealthCare Accountable Care Organization

TITLE: BJC HealthCare Accountable Care Organization Compliance Education

NUMBER: No. 4

PURPOSE: To ensure that BJC HealthCare Accountable Care Organization provides the necessary education to ensure that all members are aware of compliance expectations.

I. Statement of Policy

The purpose of this policy is to describe the process by which the BJC HealthCare Accountable Care Organization (“ACO”) provides appropriate compliance education to its members.

II. Scope of Policy

The policy applies to all BJC ACO Participants.

III. Policy

The BJC ACO is obligated to provide all of its Participants appropriate compliance education as proscribed 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”), along with a Compliance Training Program for all ACO Participants. The BJC ACOs Plan and Policies, with support from the BJC ACO’s Compliance Officer and/or Program Director, constitute the BJC ACO Compliance Training Program. The training program includes, but is not limited to, the mechanism by which compliance concerns should be reported (including an anonymous process), 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.

VI. Responsibility of the BJC ACO and All BJC ACO Participants

The BJC ACO Compliance Officer and BJC ACO Program Director are responsible for disseminating the Plan and Policies to all BJC ACO Participants and their respective employees and agents, and offering continuous support in understanding and applying the Plans and Policies in the course of BJC ACO-related activities. BJC 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.

VII. Approval and Assistance

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.


RECOMMENDED BY: BJC HealthCare ACO Board of Managers

EFFECTIVE DATE: May 2012 (Original)

REVISED DATE: January 1, 2020

REVIEWED: January 30, 2020

AUTHORIZED BY: Sandra Van Trease


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