

## BJC ACO COMPLIANCE TRAINING TOOL

As part of your participation in the BJC ACO, you must agree to comply with all federal and state laws and regulations applicable to accountable care organizations. To assist you in with compliance, we have developed a BJC ACO Compliance Plan and Policies. The plan and policies are not intended to replace any compliance plan and policies that you currently have in place. The ACO plan and policies are intended to guide your conduct when participating in ACO activities. Should there be a conflict between your existing plan and/or policies and those of the ACO, the ACO plan and policies must take precedent.

The Centers for Medicare and Medicaid Services (CMS) has five requirements for the ACO's Compliance Plan:

- **A compliance officer:** the BJC ACO compliance officer is available to assist you with any compliance questions related to your participation in the ACO. For assistance in contacting the officer, please call (314) 362-4855.
- **Mechanisms for identifying and addressing compliance problems:** the BJC ACO utilizes and follows the BJC Corporate Compliance Plan and the ACO Policies to assist ACO participants in managing compliance concerns.
- **A method for employees or contractors to anonymously report compliance concerns:** the BJC ACO uses EthicsPoint (an outside vendor) to provide a simple method anonymously report a compliance concern. Either call 1-800-525-2521 or email <https://secure.ethicspoint.com/domain/media/en/gui/22772/index.html#reportH1>.
- **A compliance training program:** this training tool will assist you in understanding the components of the BJC ACO compliance plan. You may access the BJC ACO compliance policies via the BJC ACO website. Login in as a member and click the compliance tab. The policies provide information on:
  - How the BJC ACO manages conflicts of interest
  - The requirements for the participation waiver and the patient incentive waiver
  - Sharing patient data internally
  - Appropriate marketing strategies

It is important that you read the policies carefully as CMS has strict guidelines regarding sharing patient data and marketing. In order for the ACO members to continue to avail themselves of the waivers allowed under the organization of the ACO we must be compliant with all of the requirements.

- **Violations of the law must be reported:** all members of the BJC ACO must report any probable violations of the law to the compliance officer or the program manager. The BJC ACO is committed to a policy of no retaliation for any good faith report of a probable violation.

**In addition, CMS requires that all ACO participants post signs in their facilities notifying beneficiaries that the ACO providers/suppliers are participating in the Shared Savings Program.** The BJC ACO has a standard sign for all participants to use. Please see attached. This sign should be prominently displayed.