

CMS Announces Key Dates for ACO Shared Savings Program and Advance Payment Model Applications

The Centers for Medicare and Medicaid Services (CMS) has announced key dates for Accountable Care Organizations (ACO) interested in applying for the Shared Savings Program and Advance Payment Model.

The Affordable Care Act requires CMS to establish a shared savings program to facilitate coordination and cooperation among providers to improve the quality of care for Medicare fee-for-service beneficiaries and reduce unnecessary costs. On March 31, 2011, CMS released a set of proposed rules for how they would structure and implement the Medicare Shared Savings/Accountable Care Organization (ACO) Program. For a detail analysis of these programs, go to ACP's Accountable Care Organization (ACO) webpage at http://www.acponline.org/running_practice/aco/medicare_shared_savings.htm.

MEDICARE SHARED SAVINGS PROGRAM

ACOs interested in applying for participation in the Medicare Shared Savings Program in 2012 can choose to start on April 1, 2012 and July 1, 2012. Instructions and timelines are listed below for the April 1, 2012 and July 1, 2012 program start dates. Information for future start dates will be posted at a later date.

How to Apply

You can complete your application through an automated application system or by paper submission through tracked mail (e.g. FedEx UPS, etc.). We strongly recommend using the automated application system for timeliness and tracking purposes. Before you apply, you must submit a short Notice of Intent (NOI) to get an ACO ID (required). Submitting a NOI does not obligate you to submit an application. You must submit your NOI no later than the dates listed below.

Application Cycle: Key Dates

	Start Date: April 1, 2012	Start Date: July 1, 2012
2012 applications posted on CMS Web site	Fall 2011	Fall 2011
NOIs accepted	Nov 1, 2011 - Jan 6, 2012	Nov 1, 2011 - Feb 17, 2012
CMS User ID forms accepted	Nov 9, 2011 - Jan 12, 2012	Nov 9, 2011 - Feb 23, 2012
2012 applications accepted	Dec 1, 2011 - Jan 20, 2012	Mar 1-30, 2012
2012 application approval or denial decision	March 16, 2012	May 31, 2012
Reconsideration review deadline*	March 23, 2012	June 15, 2012
*This is the date an organization/applicant must receive a favorable reconsideration review determination in order to qualify for the start date indicated on the application.		

How to Submit a Notice of Intent (NOI) to Apply (*required for all applicants*)

You must have an ACO ID to apply to participate in the Shared Savings Program. To get an ACO ID, submit a short Notice of Intent to Apply (NOI) through the online Web form:

<https://vovici.com/wsb.dll/s/11dc4g4c52d>.

CMS must get your completed NOI no later than 5 p.m. EST on the date in the Key Dates table. Once they have received and processed the NOI, you will get an acknowledgement letter via e-mail containing your ACO ID and detailed instructions on how to complete the CMS User ID application.

CMS will only accept NOIs submitted electronically. Processing time may vary, so please plan to submit the NOI as early as possible.

How to Get a CMS User ID

If you plan to apply for the 2012 Medicare Shared Savings Program electronically, you will need a CMS User ID to access the automated application system. To get a CMS User ID, follow these steps:

1. Get an ACO ID through the NOI process explained above.
2. Follow the instructions provide in your NOI acknowledgement letter to complete the CMS data access request form here:
<http://www.cms.gov/InformationSecurity/Downloads/EUAaccessform.pdf>.
3. Submit the completed CMS User ID form. Submit your form via tracked mail (e.g. FedEx, UPS, etc) to CMS no later than the date outlined in the Key Dates Table above.

Since processing times may vary, we strongly encourage you to submit your NOI and CMS User ID form as early as possible, and not to wait until the deadline.

How to Submit Your Application

Applications for both 2012 start dates are available at <http://www.cms.gov/sharedsavingsprogram> and will be accepted beginning December 1, 2011 for April 1, 2012 program start dates. Please follow the instructions in the Medicare Shared Savings Program Application 2012 document (found under “Downloads” on the Medicare Shared Savings Program website) to submit your application (electronically or manually).

The complete application must include the following documents:

- Medicare Shared Savings Program Application 2012
- Appendix A-Electronic Funds Transfer (EFT) Authorization Agreement (CMS Form 588)
- Appendix B-Participant List
- Appendix C-Data Use Agreement (DUA)

- Appendix D-Application Reference Guide

Submit paper application to:

Centers for Medicare & Medicaid Services

Attn: SSP ACO Applications

Mail Stop: C5-15-12

7500 Security Blvd.

Desk Location: C4-07-01

Baltimore, MD 21244

Contact SSPACO_Applications@cms.hhs.gov for any questions related to the NOI submission or application process.

ADVANCE PAYMENT MODEL

The Advance Payment ACO Model is an initiative developed by the CMS Innovation Center for organizations participating as ACOs in the Shared Savings Program. Selected participants in the Shared Savings Program will receive advance payments that will be recouped from the shared savings they earn. CMS will recoup these advance payments from an ACO's shared savings. The Advance Payment ACO Model will test:

- Whether providing an advance (in the form of upfront payments to be repaid in the future) will increase participation in the Shared Savings Program; and
- Whether advance payments will allow ACOs to improve care for beneficiaries, generate Medicare savings more quickly, and increase the amount of Medicare savings.

Only ACOs that enter the Shared Savings Program in April 2012 or July 2012 will be eligible for advance payments. ACOs that are co-owned with a health plan will be ineligible, regardless of whether they also fall into one of the above categories.

Under the Advance Payment ACO Model, participating ACOs will receive three types of payments:

- **An upfront, fixed payment:** Each ACO will receive a fixed payment.
- **An upfront, variable payment:** Each ACO will receive a payment based on the number of its historically-assigned beneficiaries.
- **A monthly payment of varying amount depending on the size of the ACO:** Each ACO will receive a monthly payment based on the number of its historically-assigned beneficiaries.

The structure of these payments addresses both the fixed and variable costs associated with forming an ACO.

The Advance Payment ACO Model is open only to two types of organizations participating in the Shared Savings Program:

1. ACOs that do not include any inpatient facilities **and** have less than \$50 million in total annual revenue.
2. ACOs in which the only inpatient facilities are critical access hospitals and/or Medicare low-volume rural hospitals **and** have less than \$80 million in total annual revenue

How to Apply

To apply for the Advance Payment ACO Model, interested parties must both apply for the Shared Savings Program and complete a separate application for the Advance Payment ACO Model.

For more information on applying for the Advance Payment ACO Model, visit the Innovation Center website at: <http://innovations.cms.gov/areas-of-focus/seamless-and-coordinated-care-models/advance-payment> on the CMS website.