

## **Northwest Florida Health Partners, LLC dba Gulf Coast Health Partners Waiver Descriptions**

Federal law permits Accountable Care Organizations (ACOs) such as Gulf Coast Health Partners to take advantage of a waiver of certain health care fraud and abuse laws in order to permit Gulf Coast Health Partners' to more fully develop programs, initiatives, and arrangements designed to manage, coordinate and promote accountability for the quality, patient safety, cost and overall care for patients. In accordance with federal law, Gulf Coast Health Partners makes information about its arrangements for which waiver protection is sought publically available.

Gulf Coast Health Partners was accepted to participate as an ACO in the Medicare Shared Savings Program (MSSP) effective January 1, 2014 and is in good standing under the terms of such participation agreement. The Board of Managers has authorized the arrangements described below, has made a bona fide determination that each arrangement is reasonably related to the purposes of the MSSP, and seeks protection for the ACO waiver(s) noted:

### **Documentation of Quality Standards in Electronic Health Records (EHR) of Participating Providers**

As an ACO participating in the MSSP, Gulf Coast Health Partners is responsible for coordinating and managing the overall quality and cost of the care provided to its Medicare beneficiaries and other members. This responsibility includes collecting and reporting data on adherence to various quality standards as required by the MSSP and other payer arrangements. Gulf Coast Health Partners has established a program under which its clinical health partners and other qualified personnel will obtain information that is relevant to quality standards required to be reported under the MSSP or other payer arrangements and following applicable Gulf Coast Health Partners policies, will then chart that information in the electronic health record of the applicable participating provider.

Parties acting on the ACO behalf include Ascension Care Management Health Partners who provide case management and clinical support to our ACO members:

#### **a. Participation Waiver**

The purposes of the Shared Savings Program (SSP) are (1) promoting accountability for the quality, cost, and overall care for a Medicare patient population as described in the SSP (the "Accountability Purpose"), (2) managing and coordinating care for Medicare fee-for-service beneficiaries through an ACO (the "Care Coordination Purpose") and (3) encouraging investment in infrastructure and redesigned care processes for high quality and efficient service delivery for patients, including Medicare beneficiaries (the "Infrastructure and Redesign Purpose").

### **Providing Blood Pressure Cuffs and Scales to eligible ACO members**

In furtherance of Gulf Coast Health Partners' purpose of improving quality and reducing the costs of health care services provided to certain patient populations, they will provide blood pressure cuffs and scales to select members (including Medicare beneficiaries) without charge where there is a reasonable connection between the item and the care of the member and the item advances one of the Clinical Goals (as defined below).

#### **a. Participation Waiver.**

Providing blood pressure cuffs and scales to eligible members will promote Medicare beneficiaries and other member compliance with treatment regimens for chronic disease management. Blood pressure cuffs may be provided to hypertensive beneficiaries to encourage self-monitoring and compliance with symptom management guidelines. Scales may be provided to beneficiaries with congestive heart failure to encourage symptom management or to obese patients to encourage lifestyle management changes.

b. Patient Incentive Waiver.

The Patient Incentive Waiver protects arrangements under which free or discounted items or services are provided to Medicare beneficiaries if (1) the items or services are “in-kind”, (2) there is a reasonable connection between the items or services and the medical care of the beneficiary, and (3) the items or services advance one or more of the following clinical goals: (i) adherence to a treatment regime, (ii) adherence to a drug regime, (iii) adherence to a follow-up care plan, or (iv) management of a chronic disease or condition (the “Clinical Goals”).

There is a reasonable connection between the provision of blood pressure cuffs and scales and the medical care of the members who will receive them. The provision of blood pressure cuffs and scales to eligible members will advance adherence to a treatment regime and management of a chronic disease or condition. Specifically, the provision of blood pressure cuffs to hypertensive beneficiaries will encourage self-monitoring and compliance with symptom management guidelines. The provision of scales to beneficiaries with congestive heart failure will encourage symptom management, and the provision of scales to obese patients to encourage lifestyle management changes.

### **Am I Hungry**

As an SSP Accountable Care Organization, Gulf Coast Health Partners is responsible for coordinating and managing the overall quality and cost of the care provided to its Medicare beneficiaries and other members. One of the ways in which Gulf Coast Health Partners is seeking to improve the care and reduce the cost of care provided to such individuals is to promote the management of chronic diseases and conditions among its members. As such, Gulf Coast Health Partners has entered into a Licensing Agreement with Am I Hungry? PLLC. (“AIH”) for rights to use AIH’s Am I Hungry? ® Mindful Eating Workshop materials for ACO-led workshops (“Workshops”) provided to certain of ACO’s members (including Medicare beneficiaries) upon the ACO’s request. The Workshop participation fee will include a current edition of the Am I Hungry? ® Mindful Eating Workshop text, a current edition of the companion workbook and awareness journal and access to the Am I Hungry? ® Mindful Eating Workshop participant proprietary website and automated emails reinforcing the workshop concepts. Participation fee for identified members will be paid by the ACO. Members are selected for participation by the ACO based on a determination by clinical personnel at the ACO that the Workshop will benefit the individual health needs of the member.

a. Participation Waiver.

The purposes of the SSP are (1) promoting accountability for the quality, cost, and overall care for a Medicare patient population as described in the SSP (the “Accountability Purpose”), (2) managing and coordinating care for Medicare fee-for-service beneficiaries through an ACO (the “Care Coordination Purpose”) and (3) encouraging investment in infrastructure and redesigned care processes for high quality and efficient service delivery for patients, including Medicare beneficiaries (the “Infrastructure and Redesign Purpose”).

The Workshops provided by Gulf Coast Health Partners to members (including Medicare beneficiaries) will include a series of eight (8) workshop sessions that help members understand their personal eating

patterns and to learn mindful eating skills, and therefore will further the Care Coordination Purpose of the SSP.

b. Patient Incentive Waiver.

The Patient Incentive Waiver protects arrangements under which free or discounted items or services are provided to Medicare beneficiaries if (1) the items or services are “in-kind”, (2) there is a reasonable connection between the items or services and the medical care of the beneficiary, and (3) the items or services advance one or more of the following clinical goals: (i) adherence to a treatment regime, (ii) adherence to a drug regime, (iii) adherence to a follow-up care plan, or (iv) management of a chronic disease or condition (the “Clinical Goals”).

There is a reasonable connection between the Workshops provided by Gulf Coast Health Partners and the medical care of the members who will participate in them. The Workshops to be provided by Gulf Coast Health Partners to advance the Clinical Goal of management of a chronic disease or condition, such as diabetes and obesity.