

## ACO Participation Waiver

### **Required Public Disclosures for Waivers in Connection with the Medicare Shared Savings Program**

The Centers for Medicare and Medicaid Services and the U.S. Department of Health and Human Services Office of Inspector General have provided certain waivers of federal fraud and abuse laws in connection with the operation of accountable care organizations that have entered into a participation agreement under the Medicare Shared Savings Program (“**MSSP**”). *See* 80 FR 66725.

In order to receive the benefit of the ACO Participation Waiver, the Board of Managers of Aledade Accountable Care 35, LLC (“**ACO**”) made a bona fide, detailed determination that the following arrangement between the ACO and CVS Pharmacy, Inc. (“**CVS**”), a participant in the ACO (that arrangement, the “**Arrangement**”) is reasonably related to the purpose of the MSSP, and is publicly disclosing the Arrangement in accordance with the requirements of the MSSP:

CVS will provide medication management services to the ACO that are designed to improve care coordination, quality, cost, and overall patient care.

The governing body of the ACO authorized the application of the ACO Participation Waiver to the Arrangement on March 22, 2018, following a determination that the Arrangement supports the goals of the ACO and is reasonably related to the purposes of the MSSP. Specifically, the Arrangement:

1. Promotes evidence-based medicine and patient engagement;
2. Promotes care coordination, such as through the use of telehealth, remote patient monitoring, and other enabling technologies;
3. Contributes to meeting the quality performance standards of the Shared Savings Program; and
4. Promotes evaluating health needs of the ACO’s assigned population.

The ACO will publicly disclose additional arrangements that qualify for the ACO Participation Waiver as they are authorized by its governing board on this website, in compliance with CMS’s public disclosure requirements.