**Helpful Tips for Value Based Payment (VBP) Compliance Programs**

**Handouts**

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**Potential Core VBP Compliance Policies/Plan**

1. General ACO Compliance Plan and/or Policy
2. Code of Conduct
3. Notice of Privacy Practices
4. Conflicts of Interest
5. Marketing Materials
6. Patient Incentives
7. Record Retention
8. Reporting of Probable Violations of Law
9. Prohibited Referrals/Ensuring Freedom of Choice
10. Beneficiary Data Sharing Notification
11. Data Access and Use
12. Beneficiary Notification
13. Exclusion Screening
14. Compliance Training
15. Compliance Risk Assessment and Work Plan
16. Compliance Audit and Monitoring
17. Responding to Government Audits, Inquiries and Investigations
18. Investigations Process (including beneficiary and provider complaints)
19. Hotline
20. Compliance Committee Charter
21. Disciplinary Policy/Guidelines

**Participation Provider Agreements**

Screening and Related Requirements

1. Participant shall not employ or contract with an excluded provider/entity;
2. Participant shall conduct exclusion screenings for all new employees and monthly thereafter for all employees;
3. Participant shall maintain records of exclusion screenings and provide that to the contracting entity upon request;
4. Participant shall immediately notify contracting entity upon identifying an excluded individual; and
5. Participant shall immediately remove the excluded individual from involvement with the project or areas that may receive monies from the federally-funded health care programs.

Maintenance of Records and Audits

1. Participant shall maintain records for any statutorily prescribed period of time under the program;
2. Participant shall provide contracting entity access to these records;
3. Participant shall cooperate with any government source requesting access, audit, evaluate, or inspect records related to the program;
4. Participant shall allow contracting entity access to audit, evaluate and inspect any records related to the program that the Participant in involved with;
5. Participant shall notify the contracting entity if they are contacted by a government source requesting to access, audit, evaluate and inspect records in the connection with the program; and
6. Participant shall allow contracting entity on their premises.

Compliance Program and Training

1. Participant agrees to participate in the Compliance Program
2. Participant agrees to complete any compliance training modules
3. Participant agrees to abide by all contracting entity’s compliance policies