

Medical Director Waiver

At a meeting on January 22, 2016, of the Board, the Board made a bona fide determination that an agreement for independent contractor Medical Director services between POM ACO and one of its QROs was reasonably related to the purposes of the shared savings program. Consistent with existing regulatory requirements at 42 CFR Part 425, POM ACO is required to obtain the services of a Medical Director. The Medical Director provides a broad range of medico-administrative services, including, without limitation, programmatic development around various clinical initiatives, and assistance to ACO Participants with ACO readiness activities.

Pharmacy Consultation Services Waiver

At a meeting on September 22, 2017 of the Board, the Board made a bona fide determination that a Pharmacy Consultation Services arrangement between POM ACO and its Quality Review Organizations is reasonably related to the purposes of the shared savings program. Through this arrangement, POM ACO provides pharmacy consultation services to its Quality Review Organizations at no cost, and indirectly, provides this support to ACO participants in furtherance of patient care and medication management by integrating pharmacists within the health care team at the physician organization and practice level. The Board made the determination that this pharmacy support is reasonably related to the purposes of the shared savings program, including clinical integration and ensuring the availability of medication therapy management, that is beneficial to Medicare beneficiaries and is in furtherance of the quality goals of POM ACO.