

<b>Policy Title:</b> Beneficiary Notifications & Data Sharing Preferences			
<b>Department Responsible:</b> THN ACO Operations	<b>Policy Number:</b> OP-001	<b>THN's Effective Date:</b> January 1, 2022	<b>Next Review/Revision Date:</b> September 30, 2024
<b>Title of Person Responsible:</b> Assistant Director of ACO Operations	<b>THN Approval Council:</b> THN Operations Committee	<b>Date Approved:</b> June 8, 2023	

**I. Purpose.**

- A. The purpose of OP-001 is to detail Triad HealthCare Network's (THN's) policy and processes related to the requirement to provide Beneficiary notifications.

**II. Policy.**

- A. It is the policy of THN to provide written notice to all Beneficiaries who have been aligned to THN for the Implementation Period.

**III. Procedures.**

- A. **Beneficiary Notification.** THN shall provide Beneficiaries notice in writing that they have been aligned to THN for the Implementation Period.
  - 1. THN uses the template letter provided by the Centers for Medicare & Medicaid Services (CMS) to complete this notification process. CMS does not allow THN to make any changes to the letter content, except where indicated.
    - a. Pursuant to the Accountable Care Organization Realizing Equity, Access, and Community Health (ACOREACH) model Participation Agreement (PA) and OP-002, the final notification letter content is approved by CMS and THN Compliance & Privacy prior to sending written notice to Beneficiaries.
- B. **Beneficiary Rights to Opt-Out of Data Sharing.** THN shall provide Beneficiaries who inquire about and wish to modify their data sharing preferences with information about how to do so.
  - 1. THN allows Beneficiaries to make or reverse a data sharing preference at any time. They can accomplish this by calling 1-800-MEDICARE.
  - 2. Communications provided to Beneficiaries include a note explaining that CMS may still engage in certain limited data sharing for quality improvement purposes, even if the Beneficiary has elected to decline data sharing.
- C. **Beneficiary Substance Abuse Data Opt-In.** A Beneficiary may opt-in to substance abuse disorder data sharing only by submitting a CMS-approved substance abuse disorder opt-in form to THN. THN will send CMS a completed opt-in form within 30 days of receipt. THN may inform each Beneficiary of the following information:

1. That he/she may elect to allow THN to receive Beneficiary-level data regarding the utilization of substance abuse services,
  2. Of the mechanism by which the Originally Aligned Beneficiary can make this election, and
  3. That 1-800-MEDICARE will answer any questions regarding data sharing of substance abuse services.
- D. THN may contact a Beneficiary who has elected to decline data sharing once in a given Performance Year to provide information regarding data sharing. This includes, but is not limited to mailings, phone calls, electronic communications, or other methods of communicating with Beneficiaries outside of a clinical setting.
- E. **Notification to Beneficiaries upon Termination:** THN shall provide written notice of termination to Beneficiaries no later than 30 days before the effective date of termination unless a later date is specified by CMS. These notices shall include any content specified by CMS.
- F. Any communications used to contact Beneficiaries under this policy must be in accordance with OP-002.

Date	Reviewed	Revised	Notes
January 1, 2022			Original Publication
August 2022	X		No changes
May 2023		X	Converted to REACH