



<b>Policy Title:</b> CMS Evaluations, Shared Learning and Audits			
<b>Department Responsible:</b> THN Compliance & Integrity	<b>Policy Number:</b> CPE-005	<b>THN's Effective Date:</b>	<b>Next Review/Revision Date:</b> September 30, 2024
<b>Title of Person Responsible:</b> THN Director of Compliance	<b>THN Approval Council:</b> THN Compliance and Privacy Committee	<b>Date Approved:</b> <b>June 9, 2023</b>	<b>Date Approved by THN Board of Managers:</b> <b>August 15, 2023</b>

**I. Purpose**

The purpose of CPE-005 is to outline the policies of THN related to cooperation with evaluation activities conducted by or on behalf of the Centers for Medicare and Medicaid Services (CMS).

**II. Policy**

It is the policy of THN to participate in and cooperate with all CMS monitoring and oversight requests and activities.

**III. Procedures**

- A. THN and all THN Related Individuals shall participate and cooperate in any independent evaluation activities conducted by or on behalf of CMS aimed at assessing the impact of the ACO REACH Model.
- B. THN has identified appropriate individuals to ensure meaningful participation in CMS-sponsored learning activities designed to strengthen results and share learning that emerges from participation in the ACO REACH Model.
  - 1. These activities may include, but are not limited to periodic conference calls, site visits and virtual or in-person meetings.
- C. **Site Visits.** THN and all THN Related Individuals are required to cooperate in periodic site visits by or on behalf of CMS.
  - 1. THN shall ensure that personnel with the appropriate responsibilities and knowledge are available during the visit. To ensure availability, THN may request the site visit be scheduled within the 60 days following the initial site visit notice from CMS.
- D. THN and all THN Related Individuals will cooperate with any audit, inspection, investigation and evaluation of any books, contracts, records, documents, and other evidence of the ACO and any THN Related Individual pertaining to compliance with



the terms of the ACO REACH PA.

**PREVIOUS REVISION/REVIEW DATES:**

Date	Reviewed	Revised	Notes
January 2023			New REACH Policy