Requests for Information in ACO-MS

Version 5 | May 2022

INTRODUCTION

Requests for information (RFIs) give ACOs the opportunity to correct deficiencies and/or make updates or modifications to the ACO application or change request(s). RFIs are issued in the ACO Management System (ACO-MS), and ACOs must respond to RFIs in ACO-MS.

Application Contacts (primary and secondary), the ACO Executive, Authorized to Sign Contacts (primary and secondary), and the CMS Liaison will receive emails notifying them that CMS has issued an RFI. Financial Contacts will receive RFI emails related to repayment mechanism and Form CMS-588 information. Contacts must log into ACO-MS to view deficiencies and make corrections. Navigate to your Dashboard within ACO-MS to review the assigned tasks. Each RFI will appear in the Task widget on your Dashboard.

REVIEWING DEFICIENCIES

PHASE 1 RFI RESPONSE PERIODS

- There are six possible RFI types during Phase 1. These will appear as separate tasks in the Task widget on your Dashboard:
  - Change requests for ACO participants;
  - SNF 3-Day Rule Waiver application;
  - Change requests for Skilled Nursing Facility (SNF) affiliates;
  - Participation options (only applicable to currently participating ACOs);
  - Form CMS-588 Electronic Funds Transfer (EFT) Authorization Agreements; and
  - Repayment Mechanism (with each RFI, an estimate of your ACO’s repayment mechanism amount and the calculation used will be available by clicking on the repayment amount hyperlink on the Application Cycle subtab on your ACO’s page).

⚠️ Important

Even if your ACO did not receive any RFIs on previously submitted tasks, you should take this time to review your Phase 1 Application task for any warnings related to beneficiary assignment and/or track/level ineligibility. Your ACO can also modify Phase 1 data elements as needed. Additionally, you should review the Application Cycle subtab and Participation Options Report.
PHASE 2 RFI RESPONSE PERIOD

- During the Phase 2 RFI response period, deficiencies for your Phase 2 application data elements will appear within a single application task in the Task widget on your Dashboard. Your ACO can modify Phase 2 application data elements as needed.
- Beneficiary Incentive Program (BIP) application deficiencies will display in a single task in the Task widget on your Dashboard.
- Repayment mechanism deficiencies will be listed as individual tasks, as they were in Phase 1, along with the ACO’s repayment mechanism amount, in the Application Cycle subtab.

<table>
<thead>
<tr>
<th>TASK ID</th>
<th>TYPE OF RFI</th>
</tr>
</thead>
<tbody>
<tr>
<td>CR</td>
<td>ACO Participants SNF Affiliates Participation Options (only applicable to currently participating ACOs)</td>
</tr>
<tr>
<td>RM</td>
<td>Repayment Mechanism</td>
</tr>
<tr>
<td>FM</td>
<td>Form CMS-588</td>
</tr>
<tr>
<td>IA</td>
<td>Initial Application</td>
</tr>
<tr>
<td>RA</td>
<td>Renewal/Early Renewal Application</td>
</tr>
<tr>
<td>SN3</td>
<td>SNF 3-Day Rule Waiver Application</td>
</tr>
<tr>
<td>BPC</td>
<td>BIP Application</td>
</tr>
</tbody>
</table>

Tip
In ACO-MS, use the filters in the Task widget to keep track of all your tasks.

- **Filter by ACO**, if you have multiple ACOs, to understand how many updates you will need to make for each ACO.
- **Filter by Status** to make sure all tasks are marked complete before the RFI deadline.
- **Filter by Description** to view tasks of a certain type; for example, RFI tasks associated with change requests or your ACO’s repayment mechanism.

The first two or three characters of the task ID indicate the type of RFI:

MAKING CORRECTIONS AND SUBMITTING RESPONSES

- Click the RFI task to display the application/change request; any deficiencies and comments from CMS appear within the assigned task.
- After you make and review all corrections, click “Submit.”
- When you click “Submit,” your **change request** will be sent to CMS for review.
REVIEWING OTHER INFORMATION ISSUED WITH RFIs

In addition to reviewing deficiencies issued on your application or change request(s), each RFI provides an opportunity to review important information about your ACO’s participation in the Shared Savings Program.

APPLICATION CYCLE SUBTAB

Navigate to the Application Cycle subtab on your ACO’s page to review the following:

- An estimated number of assigned beneficiaries based on both prospective assignment and preliminary prospective assignment with retrospective reconciliation for three benchmark years (2020, 2021, and 2022) for applicant ACOs and for the upcoming performance year (2023) for currently participating ACOs;
- Information about ACO participants’ prior participation in the Shared Savings Program (>50% check);
- Information about ACO participants’ experience with risk used in part to determine whether the ACO is inexperienced/experienced with performance-based risk Medicare ACO initiatives (40% check);
- Information on whether the ACO is a high-revenue or low-revenue ACO;
- Eligibility for track/level selections and participation options; and
- The agreement period the ACO is entering for purposes of applying program requirements that phase-in over time.

The values listed above may change with each RFI depending on changes made to your ACO Participant List. Additionally, beneficiary assignment for the benchmark years, which is used to determine applicant eligibility, will not be finalized until final dispositions issued at Phase 2. All prior assignment values provided should be considered estimates and are subject to change.

PARTICIPATION OPTIONS REPORT

Additional details about the information provided in the Application Cycle subtab referenced above appear in the Participation Options Report (refer to Figure 2 below) available in the Reporting tab. Please note that some data in this report is specifically targeted to applicants; for currently participating ACOs, those data points are hypothetical as if they are applying to renew
their participation the program. The *PY 2023 Participation Options Report Data Dictionary*, located in both the Application Cycle subtab (via the information bubble) and the Program Resources section of the Knowledge Library tab in ACO-MS, provides detailed descriptions of the data provided in each tab of the report.

- Download the report with each RFI period to view the most recent data. (Data from earlier rounds of review is overwritten with the latest data as they become available.)
- Make sure to select your ACO from the drop-down menu.
- Ensure the format is set to .xlsx.
- Select the correct application cycle from the Program Year drop-down menu.

**RESOURCES FOR RESPONDING TO RFIs**

- **Key Application Actions and Deadlines**
- **Application Toolkit**
- **Change Request Cycle for Performance Year Beginning on January 1, 2023** (only applicable to currently participating ACOs; available in the Program Resources section of the Knowledge Library tab in ACO-MS)
- **Overview of Participation Options in ACO-MS** (only applicable to currently participating ACOs; available in the Program Resources section of the Knowledge Library tab in ACO-MS)

**Questions?**

If you have any questions about ACO-MS or require technical assistance, click the ACO-MS Helpdesk icon (located within the ACO-MS banner), or call 1-888-734-6433.