

Participation Waiver

eBrightHealth ACO Waiver Protection Form

Program Name:

eBrightHealth ACO coverage of Upfront Administrative Fees for ACO Private Practice and Federally Qualified Health Center Participants

Type of Waiver Utilized:

ACO Participation Waiver

All Parties Involved:

Christiana Care Quality Partners ACO, LLC (d/b/a eBrightHealth ACO)

Christiana Care Health Services, Inc.

ACO Private Practice and Federally Qualified Health Center (FQHCs) Participants

Date Program will begin:

January 1, 2022

Description of Arrangement:

eBrightHealth ACO charges Participants a monthly upfront administrative fee (Upfront Administrative Fees) to contribute to the coverage of the cost of operations, including care coordination services. The administrative fee is based on beneficiary attribution.

To be successful eBrightHealth ACO must have a degree of control over total Medicare Parts A and B fee for service expenditures for eBrightHealth ACO's assigned beneficiaries to promote complete accountability for a patient population and coordination of items and services under Parts A and B and to encourage investment in infrastructure and redesigned care processes for high quality and efficient service delivery. That degree of control requires the participation of Private Practices and FQHCs, and Health System Participants.

Private Practice and FQHC ACO Participants have expressed the position that full payment of the ACO Administrative Fee will discourage participation in eBrightHealth ACO. The participation of Private Practices and FQHCs in eBrightHealth ACO is required to promote complete accountability for a patient population and coordination of items and services under Medicare Parts A and B.

eBrightHealth ACO has agreed to waive the Upfront Administrative Fees for Private Practice and FQHC ACO Participants.

Purpose of Arrangement:

To promote participation of Private Practice and FQHC ACO Participants with eBrightHealth ACO. Having the requisite number of provider participants will support the three-part aim of the Medicare Shared Savings Program and achieve an incentive to restrain wasteful spending.

Items, services, facilities or goods covered by the arrangement:

Assumption of the financial responsibility by eBrightHealth ACO of the Upfront Administrative Fees for Private Practice and FQHC Participants.

Date and manner of the Governing Body's Authorization:

Approved by the Board of Managers on 9/16/2021.