## PIONEER ACO PARTICIPATION WAIVER DISCLOSURES

The Secretary of the U.S. Department of Health and Human Services has provided waivers of certain federal fraud and abuse laws that may otherwise limit innovation by ACOs participating in the Pioneer ACO Model (see HHS, Notice of Waiver of Certain Fraud and Abuse Laws in Connection with Pioneer ACO Model, December 8, 2011). Pursuant to that notice, Steward Integrated Care Network, Inc. ("SICN") seeks waiver protection for the arrangements described below:

SICN has developed an Electronic Health Record Program Agreement that it intends to enter into with medical groups participating in the SICN Pioneer ACO that are primarily comprised of primary care physicians or specialists providing a significant amount of primary care services. The agreement requires the medical groups and their physicians to achieve "meaningful use" of EHR technology and meet SICN quality and cost-efficiency metrics. Under this agreement, SICN donates certain items and services (including electronic health record services and support) to the medical groups, and makes other payments, to support the creation, maintenance, transmission, and receipt of electronic health records among the medical groups, other providers participating in the SICN Pioneer ACO, the physicians associated with such Pioneer Participants, and other providers/suppliers that have a role in coordinating and managing care for SICN Pioneer ACO patients.

SICN has developed an Electronic Health Record Program Agreement that it intends to enter into with medical groups that either participate in the SICN Pioneer ACO (that are not primarily comprised of primary care physicians) or have a role in coordinating and managing care for SICN Pioneer ACO patients ("Outside Providers/Suppliers"). The agreement requires the medical groups and their physicians to achieve "meaningful use" of EHR technology and meet quality and cost-efficiency metrics. Under this agreement, SICN donates certain items and services (including electronic health record services and support) to the medical groups, and makes other payments, to support the creation, maintenance, transmission, and receipt of electronic health records among the medical groups, other providers participating in the SICN Pioneer ACO, the physicians associated with such Pioneer Participants, and other Outside Providers/Suppliers.

<Posted 10/15/2013>

## PIONEER ACO PARTICIPATION WAIVER DISCLOSURES

The Secretary of the U.S. Department of Health and Human Services has provided waivers of certain federal fraud and abuse laws that may otherwise limit innovation by ACOs participating in the Pioneer ACO Model (see HHS, Notice of Waiver of Certain Fraud and Abuse Laws in Connection with Pioneer ACO Model, December 8, 2011). Pursuant to that notice, Steward Integrated Care Network, Inc. ("SICN"), a participant in the Pioneer ACO Model, seeks waiver protection for the arrangements described below:

Steward Carney Hospital, Inc. (the "Hospital") and Harvard Street Neighborhood Health Center ("Harvard Street") have entered into an Affiliation and Support Agreement, dated June 3, 2013, pursuant to which the Hospital provides community benefits support to Harvard Street to support infrastructure, community, and other investments that promote high-quality and efficient service delivery for Harvard Street's patients, including Medicare beneficiaries. The agreement is designed to increase access to care for Medicare beneficiaries in Harvard Street's service area; promote accountability among SICN Pioneer ACO Providers/Suppliers for the cost, quality, and overall care delivered to Medicare beneficiaries; advance the management and coordination of care of Medicare beneficiaries through the SICN Pioneer ACO; and allow the SICN Pioneer ACO to make maximum use of its improved infrastructure and redesigned care processes to achieve high-quality and efficient service delivery for its patients.

## PIONEER ACO PARTICIPATION WAIVER DISCLOSURES

The Secretary of the U.S. Department of Health and Human Services has provided waivers of certain federal fraud and abuse laws that may otherwise limit innovation by ACOs participating in the Pioneer ACO Model (see HHS, Notice of Waiver of Certain Fraud and Abuse Laws in Connection with Pioneer ACO Model, December 8, 2011). Pursuant to that notice, Steward Integrated Care Network, Inc. ("SICN") seeks waiver protection for the arrangements described below:

Steward Norwood Hospital, Inc. (the "Hospital"), Family Medical Associates, P.C. (the "Medical Group"), and Timothy P. Lowney, Jr., D.O. (the "Physician") have entered into a Physician Recruitment Agreement, dated September 9, 2013, pursuant to which the Hospital provides the Physician, through the recruiting Medical Group, with recruitment assistance to facilitate the Physician's recruitment into the SICN Pioneer ACO as a Pioneer Provider/Supplier. The agreement is designed to ensure continuity of care and facilitate adherence to SICN Pioneer ACO cost and quality initiatives for the Medicare population of the Medical Group's retiring physician, and increase access by SICN Pioneer ACO patients in the Hospital's service area to physicians specifically educated in the ACO's processes and systems.

<Posted 10/28/2013>