

NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Waiver of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 9, 2015). Pursuant to that notice, Steward Integrated Care Network, Inc. (“SICN”) seeks waiver protection for the arrangement described below:

Steward St. Anne’s Hospital Corporation (the “Hospital”), Hawthorn Medical Associates, and Prima CARE, P.C., each Next Generation ACO Participants, have entered into an arrangement effective January 21, 2016. The purpose of the arrangement is to provide Next Generation ACO Beneficiaries with access to affordable transportation to ensure adherence to treatment regimes and follow-up care plans which is intended to further the management and coordination of care for such patients. The transportation services are currently upon request by Beneficiaries, and the Hospital may establish a regularly scheduled service as needed to accommodate patient demand and to advance Next Generation ACO Activities.

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NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Waiver of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 9, 2015 (the “Next Generation Waiver Notice”)).

Prior to Steward Integrated Care Network, Inc.’s (“SICN’s”) participation in the Next Generation ACO Model effective January 1, 2016, SICN participated in the Pioneer ACO Model. The SICN Board previously made and duly authorized bona fide determinations that the following arrangements were reasonably related to the purposes of the Pioneer ACO Model, all in compliance with that certain Notice of Certain Fraud and Abuse Laws in Connection with Pioneer ACO Model dated December 8, 2011. The SICN Board decided to maintain the following arrangements on and after January 1, 2016 in compliance with the Next Generation Waiver Notice, and subsequently made and duly authorized bona fide determinations that the arrangements (including amendments as necessary to maintain some arrangements that would otherwise automatically expire upon termination of the Pioneer Agreement) are reasonably related to ACO Activities (as such term is used in the Participation Agreement between CMS and Next Generation ACOs).

The original notices for each arrangement are included below, and references to the Pioneer ACO Model and/or Pioneer Providers/Suppliers shall be understood to be replaced by current Next Generation ACO terminology.

1. SICN developed an Electronic Health Record Program Agreement that it entered 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 donated 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 developed an Electronic Health Record Program Agreement that it entered into with medical groups that either participated in the SICN Pioneer ACO (that are not primarily comprised of primary care physicians) or had 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 donated 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.

2. SICN developed an Electronic Health Record Program Agreement that it entered 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 donated 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 developed an Electronic Health Record Program Agreement that it entered into with medical groups that either participated in the SICN Pioneer ACO (that are not primarily comprised of primary care physicians) or had 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 donated 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.

3. SICN developed an Electronic Health Record Program Agreement that was entered into with medical groups that either participate in the SICN Pioneer ACO or have a role in coordinating and managing care for SICN Pioneer ACO patients (“Outside Providers/Suppliers”), dated December 17, 2012. The Electronic Health Record Program consists primarily of three components: (a) implementation of the electronic health record systems; (b) creation and use of an electronic clinical data exchange for treatment and other appropriate purposes; and (c) integration of SHCS hospital information technology systems with the clinical data exchange and implementation of a Steward Connect Portal to allow providers, patients, and care management teams to access patient centered clinical information. Under this agreement, SICN donated 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.

4. Steward Norwood Hospital, Inc. (the “Hospital”), Family Medical Associates, P.C. (the “Medical Group”), and Timothy P. Lowney, Jr., D.O. (the “Physician”) 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.

5. Steward Good Samaritan Medical Center, Inc. (the "Hospital"), Innovative Surgical Care, P.C. (the "Medical Group"), and Valentin Atanasov, M.D. (the "Physician") entered into a Physician Recruitment Agreement, dated January 13, 2014, 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 that SICN Pioneer ACO patients in the Hospital's service area requiring general surgical services have timely access to more cost-effective treatment by a physician specifically educated in the ACO's processes and systems.

6. Steward Holy Family Hospital, Inc. (the "Hospital"), SALEM, NEW HAMPSHIRE PHYSICIANS NETWORK, P.C. (the "Medical Group"), and Demetrius P. Rizos, D.O. (the "Physician") entered into a Physician Recruitment Agreement, dated February 1, 2014, 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 that SICN Pioneer ACO patients in the Hospital's service area requiring services in the field of internal medicine or other similar specialty have timely access to more cost-effective treatment by a physician specifically educated in the ACO's processes and systems.

7. SICN developed a Skilled Nursing Facility (SNF) Participating Provider Agreement that it entered into with SNFs meeting certain criteria to become Pioneer Providers/Suppliers (as such term is defined in the Pioneer Agreement) and to provide quality health care services to Medicare beneficiaries aligned with the SICN Pioneer ACO. The agreement is reasonably related to several purposes of the Pioneer ACO Model, including, without limitation: (a) promoting accountability for the quality, cost, and overall care for the Pioneer Patients by, for example, providing incentives for the SNFs to provide post-acute care services to Pioneer Patients in a manner that reduces costs but maintains or improves the quality of care delivered, and by selecting post-acute providers with a willingness and demonstrated ability to respond to such incentives; (b) advancing the management and coordination of care for Pioneer Patients through the SICN by enhancing the partnership between Steward's Care Management department and the SNFs; and (c) implanting and investing in additional sharing of information among the SNFs and other Pioneer Providers/Suppliers which facilitate redesigned care processes for high-quality and efficient service delivery for Pioneer Patients.

8. SICN developed an Equipment Use Agreement that all Pioneer Participants and Outside Providers and Suppliers who participate in SHCN are eligible to participate in. To further the quality and efficiency of services provided to patients SHCN loaned certain point-of-care testing equipment to Pioneer Participants and Outside Provider/Suppliers meeting certain criteria. The

agreement reasonably relates to several purposes of the Pioneer ACO Model, including, without limitation: (a) advancing the management and coordination of care for Medicare beneficiaries through the SICN Pioneer ACO by, for example, enhancing access to, and the timeliness of, important clinical laboratory testing; and (b) encouraging investment in infrastructure and redesigned care processes that make greater use of point-of-care testing to improve the quality and efficiency of services delivered to patients, including Medicare beneficiaries.

9. Richard W. Smith, M.D., Mena M. Mesiha, M.D., and George J. Raukar, M.D. (collectively, the “Physicians”) entered into an Employment Agreement, effective on January 1, 2015, and a Physician Recruitment Agreement, dated October 9, 2014. SICN and Steward Saint Anne’s Hospital Corporation (“the Hospital”) facilitated the recruitment of the Physicians into the SICN Pioneer ACO, by providing Group with an income guarantee to support the development of the Physicians’ practice.

The arrangement promoted accountability for the quality, cost, and overall care for the SICN Pioneer ACO patient population (an enumerated purpose of the Pioneer ACO Model) by, for example: (a) broadening the range of services that can be provided to the SICN Pioneer ACO patient population by Pioneer Participants that participate in SICN quality programs, including evidence-based care protocols and a single medication formulary; and (b) avoiding duplication of testing by making care for SICN Pioneer ACO patients more readily available from Pioneer Participants who are connected through a common IT platform. The Board has also determined that facilitating the recruitment of the Physicians into the SICN Pioneer ACO advanced the management and coordination of care for SICN Pioneer ACO patients (another enumerated purpose of the Pioneer ACO Model) through, for example: (a) facilitating the prompt availability for elective and urgent care; (b) improved communication among Pioneer Participants treating SICN Pioneer ACO patients due to a shared electronic health record; and (c) promoting adherence to evidence-based protocols and other quality programs by making care available through Pioneer Participants who participate in such evidence-based protocols and quality programs.

10. Steward Holy Family Hospital, Inc. (the “Hospital”), Orthopaedics Northeast, P.C. (“Group”), and Amy J. Wu, M.D., (the “Physician”) entered into an Employment Agreement and a Physician Recruitment Agreement, both dated December 10, 2014. SICN and the Hospital facilitated the recruitment of the Physician into the SICN Pioneer ACO, by providing Physician with an income guarantee to support the development of the Physician’s practice.

The arrangement promoted accountability for the quality, cost, and overall care for the SICN Pioneer ACO patient population (an enumerated purpose of the Pioneer ACO Model) by, for example: (a) broadening the range of services that can be provided to the SICN Pioneer ACO patient population by Pioneer Participants that participate in SICN quality programs, including evidence-based care protocols and a single medication formulary; and (b) avoiding duplication of testing by making care for SICN Pioneer ACO patients more readily available from Pioneer Participants who are connected through a common IT platform. The Board has also determined that facilitating the recruitment of the Physician into the SICN Pioneer ACO advanced the management and coordination of care for SICN Pioneer ACO patients (another enumerated purpose of the Pioneer ACO Model) through, for example: (a) facilitating the prompt availability

for elective and urgent care; (b) improved communication among Pioneer Participants treating SICN Pioneer ACO patients due to a shared electronic health record; and (c) promoting adherence to evidence-based protocols and other quality programs by making care available through Pioneer Participants who participate in such evidence-based protocols and quality programs.

11. Jerald W. Katz, M.D. and Kevin M. Mabie, M.D., (collectively, the “Physicians”) entered into an Employment Agreement, effective April 1, 2015, and a Physician Recruitment Agreement, dated December 10, 2014.

The arrangement promoted accountability for the quality, cost, and overall care for the SICN Pioneer ACO patient population (an enumerated purpose of the Pioneer ACO Model) by, for example: (a) broadening the range of services that can be provided to the SICN Pioneer ACO patient population by Pioneer Participants that participate in SICN quality programs, including evidence-based care protocols and a single medication formulary; and (b) avoiding duplication of testing by making care for SICN Pioneer ACO patients more readily available from Pioneer Participants who are connected through a common IT platform. The Board has also determined that facilitating the recruitment of the Physician into the SICN Pioneer ACO advanced the management and coordination of care for SICN Pioneer ACO patients (another enumerated purpose of the Pioneer ACO Model) through, for example: (a) facilitating the prompt availability for elective and urgent care; (b) improved communication among Pioneer Participants treating SICN Pioneer ACO patients due to a shared electronic health record; and (c) promoting adherence to evidence-based protocols and other quality programs by making care available through Pioneer Participants who participate in such evidence-based protocols and quality programs.

Pursuant to an amendment, effective July 1, 2015, Dr. Katz shall devote an average of eight (8) hours per month to administrative and management services on behalf of Saint Anne’s Hospital Corporation (the “Hospital”) as the Chief of the Hospital’s Department of Orthopedic Surgery. This arrangement continued to align with the Pioneer agreement by:

- Promoting accountability among the physicians that participate in the Pioneer program for the quality, cost, and overall care of Medicare beneficiaries; and
- Advancing the management and coordination of care for Medicare beneficiaries through the SICN Pioneer ACO in the Hospital’s market

12. Steward St. Elizabeth’s Medical Center of Boston, Inc. (the “Hospital”), Steward Saint Anne’s Hospital Corporation, Steward Good Samaritan Medical Center, Inc., Hawthorn Medical Associates, Inc. and Prima CARE, P.C. (each, a “Participating Provider,” and collectively, the “Participating Providers”) entered into an arrangement, effective February 1, 2015, for the Hospital to provide transportation by van between and among the Hospital and the Participating Providers for patients who are obtaining treatment or follow-up care from the Hospital, including Medicare fee-for-service beneficiaries, as well as family members assisting in coordinating such patients’ care. The arrangement is designed to provide SICN Pioneer ACO patients with access to affordable transportation to ensure adherence to treatment regimes and follow-up care plans.

The transportation services are currently available upon patient request, but a regular schedule may be implemented if patient demand warrants.

13. SICN's affiliate, Steward Health Care Network, Inc. ("SHCN"), entered into an arrangement with its participating providers—all of whom are SICN providers/suppliers or "outside providers and suppliers" that have a role in coordinating and managing care for SICN-aligned Medicare beneficiaries—pursuant to which SHCN makes distributions to the participating providers that are based on quality metrics and, in part, on the percentage of commercial risk patients and SICN Pioneer ACO beneficiaries that receive medically necessary care from within SHCN. These distributions are funded exclusively from SHCN commercial payer agreements. The goal of the arrangement is to promote accountability for the quality, cost, and overall care for SICN Pioneer ACO beneficiaries and to advance the management and coordination of care for SICN Pioneer ACO beneficiaries through the SICN Pioneer ACO.

14. Steward Carney Hospital, Inc. (the "Hospital"), Manet Community Health Center, Inc., Steward Medical Group, Inc., Steward Medical Group Express Care, Inc., each Pioneer Provider/Suppliers and the Veterans Administration Clinic, an outside provider/supplier that has a role in coordinating and managing care for Pioneer ACO patients, entered into an arrangement effective December 8, 2014, which was amended effective July 23, 2015 to include an additional Pioneer Provider/Supplier, Neponset Health Center. The purpose of the arrangement is to provide SICN Pioneer ACO patients with access to affordable transportation to ensure adherence to treatment regimes and follow-up care plans which is intended to further the management and coordination of care for such patients. The transportation services are currently available seven days per week, with daily pickup and drop off between 7:00am and 5:30pm. Appointments for transportation services can be made through a centralized patient navigator located at the Hospital.

15. Steward Carney Hospital, Inc. (the "Hospital") and Harvard Street Neighborhood Health Center ("Harvard Street") entered into an Affiliation and Support Agreement, dated June 3, 2013, which is required to be reviewed and renewed on an annual basis. The Parties have mutually determined that certain updates and amendments to the Agreement are necessary. Those amendments occurred on August 11, 2014 and most recently again on August 10, 2015.

The Hospital will continue to provide community benefits and 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 amended 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.

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NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Waiver of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 9, 2015). Pursuant to that notice, Steward Integrated Care Network, Inc. (“SICN”) seeks waiver protection for the arrangement described below:

SICN and SHCN have adopted three template Electronic Health Record Program Agreements (“EHR Agreements”) that they intend to enter into with medical groups participating in the SICN Next Generation ACO that are Next Generation ACO Participants or Preferred Providers and that meet certain eligibility criteria (collectively, “Medical Groups”). These EHR Agreements are substantially similar, with differences related to the Medical Group’s technology and infrastructure prior to participation in SHCN/SICN. Each version of the EHR Agreements supports SICN’s multi-year plan to improve the quality and information sharing of patient records by governing the implementation and upgrade of Medical Groups’ electronic health records systems. Under the applicable EHR Agreements, SICN donates to Medical Groups certain items and services, including electronic health record services and support, and Medical Groups and their physicians are required to achieve “meaningful use” of EHR technology and adhere to SICN quality and cost-efficiency metrics. These arrangements are designed to promote accountability for the quality, cost and overall care for a patient population of aligned Medicare fee-for-service Beneficiaries, including managing and coordinating care for Next Generation Beneficiaries, and to encourage investment in infrastructure and redesigned care processes for high quality and efficient service delivery.

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NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Waiver of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 9, 2015). Pursuant to that notice, Steward Integrated Care Network, Inc. (“SICN”) seeks waiver protection for the arrangement described below:

SICN and Steward Health Care Network, Inc. (“SHCN”) and their affiliates have adopted two template agreements (the “Equipment Use Agreements”) that they intend to enter into with Next Generation ACO Participants, Preferred Providers, and outside providers and suppliers to loan certain point-of-care testing equipment to providers meeting certain eligibility criteria. These Equipment Use Agreements are substantially similar, with differences based on the type of medical equipment and expected length of use of such equipment. The Equipment Use Agreements are designed to enhance access to, and the timeliness of, important clinical laboratory testing, by encouraging investment in infrastructure and redesigned care processes that make greater use of point-of-care testing to improve the quality and efficiency of services delivered to a patient population that includes a population of aligned Medicare fee-for-service Beneficiaries.

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NEXT GENERATION ACO PARTICIPATION WAIVER DISCLOSURES

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SICN and Apex Health LLC (“Apex”) have entered into an Electronic Health Record Program Agreement (“EHR Agreement”) and related agreements, effective November 1, 2016. Apex is a medical group that participates in the SICN Next Generation ACO as a Next Generation ACO Participant. The EHR Agreement and related agreements support SICN’s multi-year plan to improve the quality and information sharing of patient records by governing the implementation and upgrade of Apex’s electronic health records system. Under the EHR Agreement, SICN donates to Apex certain items and services, including electronic health record services and support, and Apex and its physicians are required to adhere to SICN quality and cost-efficiency metrics. These arrangements are designed to promote accountability for the quality, cost and overall care for a patient population of aligned Medicare fee-for-service Beneficiaries, including managing and coordinating care for Next Generation Beneficiaries; to advance the management and coordination of care for Medicare beneficiaries through the SICN Next Generation ACO; and to encourage investment in infrastructure and redesigned care processes for high quality and efficient service delivery.

<Posted 12/2/16>

NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Waiver of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 9, 2015). Pursuant to that notice, Steward Integrated Care Network, Inc. (“SICN”) seeks waiver protection for the arrangement described below:

SICN and its affiliates, including Steward Healthcare Management Services LLC (“SHMS”), and Prima CARE, P.C. (“PC”) have entered into a Management and CEO Services Agreement and an Employee Transfer Agreement, effective October 31, 2016 (the “Arrangement”). PC is a medical group that participates in the SICN Next Generation ACO as a Next Generation ACO Participant. The Arrangement supports SICN’s efforts to improve care coordination and the provision of care to SICN Next Generation ACO Beneficiaries (“Next Gen Beneficiaries”) and other patients. Under the Arrangement, SHMS provides certain business, management, supervisory, and administrative services of a non-clinical nature to PC with the goal of improving performance under the SICN Next Generation ACO Agreement by meeting, or exceeding, the cost, quality and efficiency metrics established under the Management and CEO Services Agreement for the benefit of Next Gen Beneficiaries.

These arrangements are designed to promote accountability for the quality, cost and overall care for a patient population of aligned Medicare fee-for-service Beneficiaries, including managing and coordinating care for Next Gen Beneficiaries, increasing such Beneficiaries’ access to necessary care, reducing barriers to obtaining that care, and promoting adherence to that care through the provision of administrative support and staff; encouraging investment in infrastructure and redesigned care processes for high quality and efficient service delivery through the provision of supports to ensure that providers can connect and participate in SICN Next Generation ACO data and performance initiatives; and helping to meet the quality performance standards of the SICN Next Generation ACO Agreement and meeting requirements for reporting on quality and cost measures.

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NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Waiver of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 9, 2015). Pursuant to such Notice, Steward Integrated Care Network, Inc. (“SICN”) seeks protection under the Participation Waiver for the arrangements described below:

- Morton Hospital, A Steward Family Hospital, Inc. (the “Hospital”), Doctors James and Kelley Hoyer Partners in Family Care (the “Medical Group”), and Jessica Zaks, M.D. (the “Physician”) have entered into a Physician Recruitment Agreement, effective October 1, 2016, pursuant to which the Hospital provides the Physician, through the recruiting Medical Group, with recruitment assistance to facilitate the Physician’s relocation to the Hospital’s service area and recruitment into the SICN Next Generation ACO as a Next Generation Participant. The agreement is designed to enhance access for Medicare beneficiaries aligned with the SICN Next Generation ACO requiring family medicine services to cost-effective treatment by a physician specifically educated in the ACO’s processes and systems.
- SICN’s affiliate, Steward Health Care System LLC (“SHCS”), has entered into arrangements with certain Next Generation Professionals that are in good standing in Steward Health Care Network, Inc. (“SHCN”) and are primary care providers attributed to Medicare beneficiaries aligned with the SICN Next Generation ACO that underwent procedures to replace major joints of the lower extremity at hospitals affiliated with SHCS, effective on or after October 1, 2016, pursuant to which the Next Generation Professionals provide services designed to improve surgical outcomes and patient experience for such Medicare beneficiaries.
- Steward Carney Hospital, Inc. (the “Hospital”) and Harvard Street Neighborhood Health Center, Inc. (“Harvard Street”) entered into an Affiliation and Support Agreement, dated June 3, 2013, which is required to be reviewed and renewed on an annual basis. The Parties have mutually determined that certain updates and amendments to the Agreement are necessary. Those amendments occurred on August 11, 2014, August 10, 2015, and August 29, 2016. The Hospital provides community benefits and 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 aligned with the SICN Next Generation ACO, including a community benefits support grant, infrastructure support grant, and practitioner recruitment and retention support. The amended Support Agreement is designed to promote continuity of care and cost and quality initiatives for the medically underserved and vulnerable populations (including aligned Medicare beneficiaries) of North Dorchester, Mattapan, and Roxbury, Massachusetts and other locations in the Hospital’s service area, and increase access to quality health care

among such populations. Such initiatives include patient access and navigation assistance (including language assistance); outreach and wellness programs; chronic disease prevention, diagnosis, screening, and management programs; physical improvements (including information connectivity and support); and recruitment assistance.

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NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Waiver of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 9, 2015). Pursuant to such Notice, Steward Integrated Care Network, Inc. (“SICN”) seeks protection under the Participation Waiver for the arrangements described below:

- SICN has entered into arrangements with certain skilled nursing facilities (“SNFs”) that: (a) are in good standing in, and primarily affiliated with, Steward Health Care Network, Inc. (“SHCN”), (b) play a role in coordinating and managing care for Medicare beneficiaries aligned with the SICN Next Generation ACO, and (c) meet certain SHCN quality and cost-efficiency metrics, effective on or after January 1, 2017, pursuant to which the SNFs provide quality health care services to such Medicare beneficiaries as Next Generation Participants under the Next Generation ACO Model and participating providers under the Bundled Payment Program.

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NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Amended Waivers of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 29, 2016).

Pursuant to such Notice, Steward Integrated Care Network, Inc. ("SICN") seeks protection under the Participation Waiver for the arrangement described below:

- Steward Norwood Hospital, Inc. (the "Hospital"), Walpole Medical Center (the "Medical Group"), and Rezene Berhane, M.D. (the "Physician") have entered into a Physician Recruitment Agreement, effective September 9, 2017, 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 Next Generation ACO as a Next Generation Participant in the Hospital's service area. The agreement is designed to enhance access for Medicare beneficiaries aligned with the SICN Next Generation ACO requiring primary care services, with a particular focus on the management of addiction treatment. The arrangement is further intended to ensure that aligned beneficiaries have access to cost-effective treatment by a physician specifically educated in the ACO's processes and systems.

<Posted 11/9/17>

NEXT GENERATION ACO PARTICIPATION WAIVER DISCLOSURES

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Steward Carney Hospital, Inc. (the “Hospital”) and Harvard Street Neighborhood Health Center (“Harvard Street”) entered into an original Affiliation and Support Agreement, dated June 3, 2013, as updated and amended by a “Letter Agreement” dated December 10, 2017, to promote continuity of care and cost and quality initiatives for the patient population of North Dorchester, Mattapan and Roxbury and will increase access by SICN Next Gen Beneficiaries in this service area.

Under the Letter Agreement, Hospital will continue to provide community benefits and 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 Letter Agreement is designed to increase access to care for Medicare beneficiaries in Harvard Street’s service area; promote accountability among SICN Next Generation 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 Next Generation ACO; and allow the SICN Next Generation ACO to make maximum use of its improved infrastructure and redesigned care processes to achieve high-quality and efficient service delivery for its patients.

<Posted 2/9/18>

NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Amended Waiver of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 29, 2016). Pursuant to that notice, Steward Integrated Care Network, Inc. ("SICN") seeks waiver protection for the arrangement described below:

SICN and Morton Hospital, a Steward Family Hospital, Inc. (the "Hospital"), a Next Generation ACO Participant, Jonathan Kittredge, M.D. ("Physician") and Prima Care, P.C. ("Medical Group"), entered into a Physician Recruitment Agreement dated December 21, 2017 pursuant to which the Hospital provided the Physician, through the recruiting Medical Group, with recruitment assistance to facilitate the Physician's recruitment into the SICN Next Generation ACO. The agreement was designed to ensure that SICN Next Generation ACO patients in the Hospital's service area requiring vascular surgery services have timely access to more cost-effective treatment by a physician specifically educated in the ACO's processes and systems.

The SICN Board has determined that facilitating the recruitment of the Physician into the Medical Group and the SICN Next Generation ACO would ensure that SICN Next Generation ACO patients in Hospital's service area requiring vascular surgery services have timely access to local vascular surgery services and to more cost-effective treatment by a physician educated in the ACO's processes and systems which, in turn, are reasonably related to ACO Activities, including: (a) promoting accountability among the SICN Next Generation ACO Participants and Preferred Providers for the quality, cost, and overall care of Medicare beneficiaries; (b) advancing the management and coordination of care for Medicare beneficiaries, especially those with chronic conditions, through the SICN Next Generation ACO; and (c) allowing the SICN Next Generation ACO to make maximum use of its improved infrastructure and redesigned care processes to achieve high quality and efficient service delivery for its patients.

<Posted 2/9/18>

NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Amended Waiver of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 29, 2016). Pursuant to that notice, Steward Integrated Care Network, Inc. ("SICN") seeks waiver protection for the arrangement described below:

SICN developed an Electronic Health Record Program Agreement to enter into with medical groups participating in the SICN Next Generation ACO, which are primarily comprised of primary care physicians or specialists providing a significant amount of primary care services, and outside providers and suppliers that have a role in coordinating and managing care for SICN Next Generation ACO patients. Under the agreement, SICN will donate certain items and services (including electronic health record services and support), and make other payments, to support the creation, maintenance, transmission, and receipt of electronic health records among the medical groups and other providers participating in the SICN Next Generation ACO, their associated physicians, and other providers/suppliers that have a role in coordinating and managing care for SICN Next Generation ACO patients. The agreement requires providers receiving the items and services to meet SICN quality and cost-efficiency metrics.

The SICN Board determined that the agreement is reasonably related to ACO Activities, including, without limitation: (a) advancing the management and coordination of care for Medicare beneficiaries through the SICN Next Generation ACO by, for example, enhancing the accuracy of patient health information, facilitating the ready exchange of patient health information among physicians and medical groups participating in the SICN Next Generation ACO, reducing the provision of duplicative testing, and enhancing safety by maintaining complete medication and allergy lists; and (b) allowing the SICN Next Generation ACO to make maximum use of its improved infrastructure and redesigned care processes to achieve high-quality and efficient service delivery for its patients.

The Electronic Health Record Program Agreement was concurrently approved by the Steward National Care Network, Inc. Board seeking waiver protection under the Medicare Shared Savings Program.

<Posted 2/16/18>

NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Amended Waiver of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 29, 2016). Pursuant to that notice, Steward Integrated Care Network, Inc. (“SICN”) seeks waiver protection for the arrangement described below:

SICN and Steward St. Elizabeth’s Medical Center of Boston, Inc., Steward Carney Hospital, Inc., Steward Good Samaritan Medical Center, Inc., Steward Holy Family Hospital, Inc., Steward Norwood Hospital, Inc., Nashoba Valley Medical Center, A Steward Family Hospital, Inc., Morton Hospital, A Steward Family Hospital, Inc., Steward Saint Anne’s Hospital Corporation, and New England Sinai Hospital, A Steward Family Hospital, Inc., each a Next Generation ACO Participant (each a “Hospital” and collectively, the “Hospitals”), identified a need for patient transportation for those beneficiaries referred to the Hospitals for treatment or follow-up care by certain medical group Next Generation ACO Participants (each, a “Participating Provider,” and collectively, the “Participating Providers”). The Hospitals agreed to provide transportation by van between and among each Hospital and the Participating Providers for patients who are obtaining treatment or follow-up care from a Hospital, including Medicare fee-for-service beneficiaries, as well as family members assisting in coordinating such patients’ care. The arrangement is designed to provide SICN Next Generation ACO patients with access to affordable transportation to ensure adherence to treatment regimes and follow-up care plans. The transportation services are currently available upon patient request, but a regular schedule may be implemented if patient demand warrants.

The SICN Board determined that providing certain free or discounted non-emergency transportation to beneficiaries for travel to or from the locations of their health care providers (i) is reasonably connected to the medical care of beneficiaries; (ii) will promote beneficiaries’ adherence to a treatment regime, drug regime, or follow-up care plan or will advance beneficiaries’ management of their chronic diseases or conditions; and (iii) is reasonably related to Next Generation ACO Activities in that it will help manage and coordinate care for beneficiaries through the SICN Next Generation ACO.

<Posted 2/16/18>

NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Amended Waiver of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 29, 2016). Pursuant to that notice, Steward Integrated Care Network, Inc. (“SICN”) seeks waiver protection for the arrangement described below:

SICN developed an infrastructure support program (the “Infrastructure Support Program”) for certain eligible providers who are entities or individuals that have signed Participating Provider Agreements with SICN to become Next Generation ACO Participants, as such term is defined in the Next Generation ACO Agreement entered into by SICN and the Centers for Medicare and Medicaid Services (“Eligible Providers”) for each Medicare beneficiary assigned to the SICN Next Generation ACO (“SICN Next Gen ACO Beneficiaries”) that is attributed to such an Eligible Provider, to assist with integration into the SICN Next Gen ACO.

The Infrastructure Support Program incentivizes certain Eligible Providers to participate in care management and care coordination activities. Payments must be used to improve the quality, safety, and efficiency of medical services provided to patients, including SICN Next Gen ACO Beneficiaries.

<Posted 5/1/18>

NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Amended Waiver of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 29, 2016). Pursuant to that notice, Steward Integrated Care Network, Inc. (“SICN”) seeks waiver protection for the arrangement described below:

SICN, Steward Norwood Hospital, Inc. (the “Hospital”), a Next Generation ACO Participant, Timothy Hartshorn, M.D. (“Physician”) and OrthoBoston, LLC (“Medical Group”), entered into a Physician Recruitment Agreement dated March 19, 2018 pursuant to which the Hospital provided the Physician, through the recruiting Medical Group, with recruitment assistance to facilitate the Physician’s recruitment into the SICN Next Generation ACO. The agreement was designed to ensure that SICN Next Generation ACO patients in the Hospital’s service area requiring orthopaedic surgery services, including shoulder repair, have timely access to more cost- effective treatment by a physician specifically educated in the ACO’s processes and systems.

<Posted 5/1/18>

NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Amended Waiver of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 29, 2016). Pursuant to that notice, Steward Integrated Care Network, Inc. (“SICN”) seeks waiver protection for the arrangement described below:

SICN, Steward Rockledge Hospital, Inc. (the “Hospital”), a Next Generation ACO Participant, Kalpana Gorthi, M.D. (“Physician”) and Kalpana Gorthi, MD, PLLC, d/b/a Revive MD Internal Medicine (“Medical Group”), entered into a Physician Recruitment Agreement dated May 1, 2018 pursuant to which the Hospital provided the Physician, through the recruiting Medical Group, with recruitment assistance to facilitate the Physician’s recruitment into the SICN Next Generation ACO. The agreement was designed to ensure that SICN Next Generation ACO patients in the Hospital’s service area requiring primary care services have timely access to more cost- effective treatment by a physician specifically educated in the ACO’s processes and systems.

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NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Amended Waiver of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 29, 2016). Pursuant to that notice, Steward Integrated Care Network, Inc. (“SICN”) seeks waiver protection for the arrangement described below:

SICN developed an infrastructure support program (the “Infrastructure Support Program”) for certain eligible providers who are entities or individuals that have signed Participating Provider Agreements with SICN to become Next Generation ACO Participants, as such term is defined in the Next Generation ACO Agreement entered into by SICN and the Centers for Medicare and Medicaid Services (“Eligible Providers”) for each Medicare beneficiary assigned to the SICN Next Generation ACO (“SICN Next Gen ACO Beneficiaries”) that is attributed to such an Eligible Provider, to assist with integration into the SICN Next Gen ACO. SICN previously implemented a separate Infrastructure Support Program for other eligible providers.

The Infrastructure Support Program incentivizes certain Eligible Providers to participate in care management and care coordination activities. Payments must be used to improve the quality, safety, and efficiency of medical services provided to patients, including SICN Next Gen ACO Beneficiaries.

<Posted 10/1/18>

NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Amended Waiver of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 29, 2016). Pursuant to that notice, Steward Integrated Care Network, Inc. (“SICN”) seeks waiver protection for the arrangement described below:

SICN, Steward Rockledge Hospital, Inc. (the “Hospital”), a Next Generation ACO Participant, Nikolaos Kannellopoulos, M.D. (“Physician”) and Island Family Health LLC (“Medical Group”), entered into a Physician Recruitment Agreement effective as of December 7, 2018, pursuant to which the Hospital provided the Physician, through the recruiting Medical Group, with recruitment assistance to facilitate the Physician’s recruitment into the SICN Next Generation ACO. The agreement was designed to ensure that SICN Next Generation ACO patients in the Hospital’s service area requiring primary care services have timely access to local primary care services, including preventive care, and to more cost-effective treatment by a physician educated in the ACO’s processes and systems.

<Posted 2/1/19>

NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Amended Waiver of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 29, 2016). Pursuant to that notice, Steward Integrated Care Network, Inc. (“SICN”) seeks waiver protection for the arrangement described below:

SICN, Morton Hospital, A Steward Family Hospital, Inc. (the “Hospital”), a Next Generation ACO Participant, Jonathan Kittredge, M.D. (“Physician”) and Prima Care, P.C. (“Medical Group”), entered into the Physician Recruitment Agreement dated December 21, 2017 pursuant to which the Hospital provided the Physician, through the recruiting Medical Group, with recruitment assistance to facilitate the Physician’s recruitment into the SICN Next Generation ACO. The agreement was designed to ensure that SICN Next Generation ACO patients in the Hospital’s service area requiring vascular surgery services have timely access to local vascular surgery services and to more cost- effective treatment by a physician specifically educated in the ACO’s processes and systems. On December 17, 2018, the Parties entered into an Amendment to the Physician Recruitment Agreement to update certain terms.

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NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Amended Waiver of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 29, 2016). Pursuant to that notice, Steward Integrated Care Network, Inc. (“SICN”) seeks waiver protection for the arrangement described below:

SICN entered into an EHR Donation Agreement dated February 26, 2019 with Neurology Center of New England, P.C. (the “Practice”), which is a Next Generation ACO Participant, pursuant to which SICN shall donate certain items and services and make other contributions to the Practice to support the creation, maintenance, transmission and receipt of electronic health records by the Practice. The SICN Board determined that the EHR Donation Agreement is reasonably related to ACO Activities, including, without limitation: (a) advancing the management and coordination of care for Medicare beneficiaries through the SICN Next Generation ACO by, for example, enhancing the accuracy of patient health information, facilitating the ready exchange of patient health information among physicians and medical groups, including Practice, participating in the SICN Next Generation ACO, reducing the provision of duplicative testing, and enhancing safety by maintaining complete medication and allergy lists; and (b) allowing the SICN Next Generation ACO to make maximum use of its improved infrastructure and redesigned care processes to achieve high-quality and efficient service delivery for its patients.

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NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Amended Waiver of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 29, 2016). Pursuant to that notice, Steward Integrated Care Network, Inc. (“SICN”) seeks waiver protection for the arrangement described below:

SICN developed an Amended and Restated Electronic Health Record Program Agreement to be entered into between SICN and certain Next Generation ACO Participants or Preferred Providers, pursuant to which SICN shall donate certain items and services and make other contributions to support the creation, maintenance, transmission and receipt of electronic health records by the Next Generation ACO Participants or Preferred Providers. The SICN Board determined that the Amended and Restated Electronic Health Record Program Agreement is reasonably related to ACO Activities, including, without limitation: (a) advancing the management and coordination of care for Medicare beneficiaries through the SICN Next Generation ACO by, for example, enhancing the accuracy of patient health information, facilitating the ready exchange of patient health information among physicians and medical groups participating in the SICN Next Generation ACO, reducing the provision of duplicative testing, and enhancing safety by maintaining complete medication and allergy lists; and (b) allowing the SICN Next Generation ACO to make maximum use of its improved infrastructure and redesigned care processes to achieve high-quality and efficient service delivery for its patients.

<Posted 4/1/19>

NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Amended Waiver of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 29, 2016).mon Pursuant to that notice, Steward Integrated Care Network, Inc. (“SICN”) seeks waiver protection for the arrangement described below:

SICN, Steward Rockledge Hospital, Inc. (the “Hospital”), a Next Generation ACO Participant, Victor Soriano, M.D. (“Physician”) and Soriano Physician Services, PLLC (“Medical Group”), entered into a Physician Recruitment Agreement effective as of July 1, 2019, pursuant to which the Hospital provided the Physician, through the recruiting Medical Group, with recruitment assistance to facilitate the Physician’s recruitment into the SICN Next Generation ACO. The agreement was designed to ensure that SICN Next Generation ACO patients in the Hospital’s service area requiring primary care services have timely access to local primary care services and to more cost-effective treatment by a physician educated in the ACO’s processes and systems.

<Posted 8/5/19>

NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Amended Waiver of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 29, 2016). Pursuant to that notice, Steward Integrated Care Network, Inc. (“SICN”) seeks waiver protection for the arrangement described below:

SICN entered into an EHR Donation Agreement dated September 5, 2019, with Primary Care of the Treasure Coast, Inc. (the “Practice”), which is a Next Generation ACO Participant, pursuant to which SICN shall donate certain items and services and make other contributions to the Practice to support the creation, maintenance, transmission and receipt of electronic health records by the Practice. The SICN Board determined that the EHR Donation Agreement is reasonably related to ACO Activities, including, without limitation: (a) advancing the management and coordination of care for Medicare beneficiaries through the SICN Next Generation ACO by, for example, enhancing the accuracy of patient health information and facilitating the ready exchange of patient health information among physicians and medical groups, including Practice, participating in the SICN Next Generation ACO; and (b) allowing the SICN Next Generation ACO to make maximum use of its improved infrastructure and redesigned care processes to achieve high-quality and efficient service delivery for its patients.

<Posted 10/18/2019>

NEXT GENERATION 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 Next Generation ACO Model (see HHS, Notice of Amended Waiver of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 29, 2016). Pursuant to that notice, Steward Integrated Care Network, Inc. (“SICN”) seeks waiver protection for the arrangement described below:

SICN developed an infrastructure support program (the “Infrastructure Support Program”) for certain eligible providers who are entities or individuals that have signed Participating Provider Agreements with SICN to become Next Generation ACO Participants, as such term is defined in the Next Generation ACO Agreement entered into by SICN and the Centers for Medicare and Medicaid Services (“Eligible Providers”) for each Medicare beneficiary assigned to the SICN Next Generation ACO (“SICN Next Gen ACO Beneficiaries”) that is attributed to such an Eligible Provider, to assist with integration into the SICN Next Gen ACO. SICN previously implemented a separate Infrastructure Support Program for other eligible providers.

The Infrastructure Support Program incentivizes certain Eligible Providers to participate in care management and care coordination activities. Payments must be used to improve the quality, safety, and efficiency of medical services provided to patients, including SICN Next Gen ACO Beneficiaries.

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