

Trinity Integrated Care, LLC

Public Disclosure for the ACO Participation Waiver

In accordance with the public disclosure requirements for the ACO Participation Waivers set forth in that certain final rule promulgated by the Centers for Medicare & Medicaid Services (CMS) and the Office of Inspector General, Health and Human Services (OIG) published at 80 Federal Register 66726 on October 29, 2015, the following describes arrangements of Trinity Integrated Care, LLC (the "ACO") that may require a waiver of applicable law, rules and regulations. The ACO's Management Board has duly authorized the arrangements below and made a bona fide determination that each arrangement is reasonably related to the purposes of the Medicare Shared Savings Program. The details and rationale of such decision were recorded in a written resolution of the Management Board and also detailed in the minutes related to such meeting.

The following information describes each arrangement for which our ACO seeks protection under the ACO Participation Waiver, including any material amendment or modification to a disclosed arrangement.

Home Monitoring Devices

- *Parties to the arrangement:* The ACO has approved a program to provide home monitoring devices to patients of THIC ACO providers.
- *Date of arrangement:* The arrangement was approved on 2/28/2017
- *Items, services, goods, or facility provided:* Patients under the care of an ACO participating provider are eligible to receive home monitoring equipment when the patient does not have access to necessary home monitoring devices.
- *Date and nature of any amendments to the arrangement, if applicable:* Amended 3/8/2022 to expand the arrangement to allow for all THIC ACO chapters to provide home monitoring equipment to patients under the care of an ACO participating provider when the patient does not have access to necessary home monitoring devices. The ACO's population health care management team will review proper use of the equipment with the patient.

Paramedic Support

- *Parties to the arrangement:* The ACO has approved a program to provide home services and other follow-up care through the Ada County Paramedics to ACO beneficiaries in the Boise, Idaho area.
- *Date of arrangement:* The arrangement was approved on 8/28/2018
- *Items, services, goods, or facility provided:* The ACO will compensate the Ada County Paramedics for home services and follow-up care provided to ACO beneficiaries that have been treated in the emergency department to help reduce unnecessary return trips to the emergency department.
- *Date and nature of any amendments to the arrangement, if applicable:* N/A

Transitional Care Management

- *Parties to the arrangement:* The ACO has approved a transitional care management

- program for any patients under the care of an ACO participating provider.
- *Date of arrangement:* The arrangement was approved on 2/26/2019
- *Items, services, goods, or facility provided:* The program provides transitional care management services to beneficiaries and patients with medical and/or psychosocial problems requiring moderate or high complexity medical decision-making. Applicable patients will be identified and then contacted within two business days of the transition to the ambulatory environment and a comprehensive assessment will be performed with interventions and a plan of care documented. The documentation will be shared with the participating provider.
- *Date and nature of any amendments to the arrangement, if applicable:* N/A

Transportation

- *Parties to the arrangement:* The ACO has approved a transportation program for any patients under the care of an ACO participating provider.
- *Date of arrangement:* The arrangement was approved on 2/23/2021
- *Items, services, goods, or facility provided:* Patients under the care of an ACO participating provider are provided with free or discounted local transportation services when the patient is unable to access transport services for needed medical care or items. The program will not transport a patient greater than fifty (50) miles and excludes ambulance, luxury or air transportation services. The program will be supported by the ACO's population health care management team.
- *Date and nature of any amendments to the arrangement, if applicable:* N/A

Pre-Payments

- *Parties to the arrangement:* The ACO has approved a pre-payment model for all ACO participants.
- *Date of arrangement:* The arrangement was approved on 12/14/2021
- *Items, services, goods, or facility provided:* ACO participants with high-performing ACO providers that meet minimum ACO quality metrics are eligible to receive a portion of their projected shared savings amounts in the form of a pre-payment to help support infrastructure and costs of coordinating patient care.
- *Date and nature of any amendments to the arrangement, if applicable:* Amended 12/13/2022 to clarify payment amounts and eligibility. Any revisions to the pre-payment amounts and/or eligibility requirements for the Pre-Payment Program must be approved in advance by the Management Board.

SNF Incentive Program

- *Parties to the arrangement:* The ACO has approved a SNF Incentive Program for eligible skilled nursing facilities ("SNFs") providing care to ACO beneficiaries.
- *Date of arrangement:* The arrangement was approved on 6/11/2024
- *Items, services, goods, or facility provided:* Eligible SNFs will be provided a fixed payment amount per day of improved average length of stay ("ALOS") over prior year, with payments provided from the ACO's shared savings. No incentive payment shall be made for a reduction in ALOS days below a threshold approved by the Management

Board, and incentive payments are contingent on the SNF maintaining or improving both its return to inpatient rate and ACO beneficiary acceptance rate.

- *Date and nature of any amendments to the arrangement, if applicable:* N/A

Quality Reporting Support Program

- *Parties to the arrangement:* The ACO has approved the Quality Reporting Support Program for all independent ACO participants who meet eligibility requirements.
- *Date of arrangement:* The arrangement was approved on 10/8/2024.
- *Items, services, goods, or facility provided:* Eligible ACO participants may be reimbursed up to a specified amount for EMR vendor costs incurred to support the testing and production of QRDA 1 files required to satisfy ACO quality reporting in 2025.
- *Date and nature of any amendments to the arrangement, if applicable:* N/A

InNote Incentive Program

- *Parties to the arrangement:* The ACO has approved the InNote Incentive Program for independent ACO participants who meet eligibility requirements and utilize the ACO's InNote tool.
- *Date of arrangement:* The arrangement was approved on 6/9/2026.
- *Items, services, goods, or facility provided:* Eligible ACO participants may earn a fixed payment for improved management and documentation of chronic condition diagnoses utilizing the InNote tool. The fixed payment is payable only for identified gaps that are appropriately reviewed in the tool and documented in the medical record.
- *Date and nature of any amendments to the arrangement, if applicable:* N/A

Retired Waivers (no longer used by THIC ACO):

Care Management

- *Parties to the arrangement:* The ACO has approved a program that provides compensation to ACO participating providers/suppliers in the Philadelphia, Pennsylvania area.
- *Date of arrangement:* The arrangement was approved on 2/28/2017
- *Items, services, goods, or facility provided:* The ACO participating providers/suppliers shall be compensated to provide additional care management services, including patient navigation services, early disease surveillance and intervention services to beneficiaries attributed to the ACO. These services are in lieu of the ACO staff providing some of these services to beneficiaries.
- *Date and nature of any amendments to the arrangement, if applicable:* 3/8/2022, use of waiver was discontinued by THIC ACO.