

Trinity Health ACO, Inc.

Public Disclosure for the ACO Participation Waiver

In accordance with the public disclosure requirements for the ACO Participation Waivers set forth in that Notice of Amended Waivers of Certain Fraud and Abuse Laws in Connection with the Next Generation ACO Model, December 29, 2016, the following describes arrangements of Trinity Health, Inc. (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 Next Generation ACO model. 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. Each arrangement is summarized as follows:

1. The ACO has determined that it needs a transportation program to provide patients that are under the clinical care of an ACO participating provider with free or discounted local transportation services when the patient is unable to access transport services for needed medical care (the "Transportation Program"). The Transportation Program will be available for patients who (i) are under the care of an ACO participating provider; (ii) do not have access to reliable transportation services for medically necessary health care services and (iii) require the management and support of the ACO's population health management team. High risk patients may access the Transportation Program thru the referral of the ACO's population health management team. In addition, patients who are classified by the ACO as rising risk may also access the Transportation Program following a referral by the office staff of an ACO participating provider after such office staff receive training by the ACO regarding the proper use of the Transportation Program. The Transportation Program will not transport a beneficiary or patient greater than fifty (50) miles and excludes ambulance, luxury or air transportation services. The permitted modes of transportation include ride share services, vehicles operated by third party vendors, shuttles, taxis and other public transportation. The Transportation Program is limited to transporting a patient to or from the patient's residence and the offices of an ACO participating provider or other location where the patient can access needed healthcare services.
2. The ACO provides care management services for patients and beneficiaries receiving care from ACO participating providers including services that enable a participating provider to bill a transitional care management code(s).

Future arrangements will be added to this list.