

Adding ACO Participants & SNF Affiliates in ACO-MS

Version 7 | April 2024

The [ACO Management System \(ACO-MS\)](#) provides an integrated platform to create and manage the ACO Participant List and/or Skilled Nursing Facility (SNF) Affiliate List (if applicable).

During Phase 1 of the application submission period, an ACO will create its ACO Participant List and SNF Affiliate List (if applicable). Each year, within its agreement period, the ACO may request changes to these lists effective for the next performance year. Changes to these lists, including adding new ACO participants or SNF affiliates, require CMS approval. ACOs must submit a change request in ACO-MS to make any edits to the lists. This document highlights the information ACOs need to add an ACO participant or SNF affiliate in ACO-MS for the upcoming performance year, as well as tips for how to avoid common errors.

Important

All approved change requests to add an ACO participant or SNF affiliate to your ACO Participant List or SNF Affiliate List are effective at the start of the **next performance year**.

ACO-MS PECOS VALIDATION

When an ACO starts a change request to add an ACO participant or a SNF affiliate, ACO-MS compares the ACO's entry to the Provider Enrollment, Chain, and Ownership System (PECOS) data for the following information:

- *(For ACO participants only)* The **taxpayer identification number (TIN)** and **legal business name (LBN)**: The TIN and LBN entered in ACO-MS must match PECOS exactly. If the LBN is entered incorrectly, the user may enter the **Provider Transaction Access Number (PTAN)** that matches what is listed in PECOS to auto-populate the correct LBN.
- *(For SNF affiliates only)* The **TIN** and **CMS Certification Number (CCN)**: The TIN, LBN, and CCN, in ACO-MS must match PECOS exactly.
- **Medicare enrollment**: All ACO participants and SNF affiliates must be Medicare-enrolled to be approved to participate in the ACO. Additionally, the SNF affiliate TIN and CCN in the change request must be associated in PECOS to be approved to participate.
- **Sole proprietor status**: ACO-MS identifies sole proprietors and automatically includes the linked TIN (either the Social Security number (SSN) or Employer Identification Number (EIN) of the sole proprietor) if the information is correctly entered in the change request and the participant is identified as a sole proprietor in PECOS.
- **Medicare exclusion**: ACO participants and SNF affiliates must be in good standing with Medicare.

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HELPFUL TIPS FOR MATCHING PECOS

- All nine digits of the TIN must match PECOS exactly to pass the check for Medicare enrollment. If the TIN does not pass this check, confirm the TIN was entered correctly and follow up with the ACO participant, if necessary.
- The LBN check is not case sensitive and ignores extra spaces and punctuation.
- ACOs can submit a change request that does not initially pass the ACO-MS PECOS checks; however, the proposed ACO participant or SNF affiliate must pass all enrollment checks by the final PECOS check date to be approved.

ACO-MS OVERLAP VALIDATION

When an ACO starts a change request to add an ACO participant, ACO-MS also compares the ACO's entry against participant list information for both the Shared Savings Program and all other Medicare shared savings initiatives to check for overlapping participation. ACO-MS performs an automated TIN check to identify if the proposed ACO participant is either participating in or pending participation in another Shared Savings Program ACO or Medicare shared savings initiative.

ACOs can submit a change request that does not initially pass the ACO-MS overlap check; however, the proposed ACO participant must pass all overlap checks by the final overlap check date to be approved.

BENEFICIARY ASSIGNMENT ESTIMATES

CMS provides the ACO with an **estimated** number of beneficiaries assigned to the ACO participant. These are estimates to be used for informational purposes. Although CMS is providing participant-level assignment estimates, CMS determines claims-based assignment based on where the beneficiary received the plurality of their primary care services (as measured by Medicare-allowed charges) to the ACO as a whole, as opposed to assigning beneficiaries to a particular ACO participant. Additionally, these estimates are subject to change and generally overestimate an ACO's assigned beneficiary population (this is especially true of the estimates of the preliminary prospective assignment with retrospective reconciliation methodology). For additional details, refer to the [Beneficiary Assignment Estimates in ACO-MS tip sheet](#).

ACO PARTICIPANTS

ACOs may add ACO participants for the upcoming performance year by taking the following actions and steps below:

- 1 Enter the **Medicare-enrolled TIN** the ACO participant,
OR
- 2 Enter the Medicare-enrolled TIN and ACO participant **LBN**.

OR

If you do not know the LBN or the LBN entered does not match PECOS, enter the **PTAN**.

After you enter an LBN and select “Verify Information,” select “Yes” when prompted if you have a “Provider Transaction Access Number” and enter the PTAN.

For Medicare Part A services:

The PTAN refers to the Online Survey Certification and Reporting (OSCAR) number, also referred to as the CCN.

For Medicare Part B services:

The PTAN refers to the Provider Identification Number (PIN).

- 3 For merged/acquired TINs:** If the TIN has been merged with or acquired by another ACO participant, select “Yes” for the merged/acquired indicator. Enter the acquiring TIN. The acquiring TIN LBN should auto-populate based on the acquiring TIN entered. Next, provide the required **supporting documentation**, including the required attestation as well as documentation demonstrating the merged/acquired relationship between the two TINs (e.g., a bill of sale, joinder agreement, or other legal documents).

Note: If the merged or acquired TIN is already on the ACO Participant List for the upcoming performance year, the ACO will first need to delete the ACO participant record and then submit a change request to re-add the merged or acquired participant for the next performance year.

- 4 For sole proprietors:** If the TIN is identified as a sole proprietor, their **SSN** or **EIN** will auto-populate the **Medicare-Enrolled TIN** field or the **Billing TIN** field, respectively.
- 5 For joint ventures:** If the TIN is in a joint venture between ACO professionals and hospitals, ACOs must select “Yes” for the joint venture indicator. If the TIN is not in a joint venture between ACO professionals and hospitals, ACOs must select “No”.
- 6** Upload the first page and signature page of the **executed ACO participant agreement**. Refer to the [ACO Participant List and Participant Agreement Guidance](#) for executed ACO participant agreement requirements.

SNF AFFILIATES

ACOs that participate in the Shared Savings Program and are approved or applying for a *SNF 3-Day Rule Waiver* may add SNF affiliates for the upcoming performance year following the steps below:

- 1** Enter the **Medicare-enrolled TIN** for the SNF affiliate.
- 2** Enter the SNF affiliate **CCN** and click “Verify CCN.” For a hospital or critical access hospital (CAH) operating under a swing bed agreement, ACOs must enter the swing bed CCN. A swing bed CCN includes a letter in the third position, for example a “U” or “Z” such as “12U456”. If the SNF affiliate TIN and CCN combination matches PECOS, ACO-MS will auto-populate the SNF affiliate TIN LBN and associated Doing Business As (DBA) name.
- 3** Upload the first page and signature page of the **executed SNF affiliate agreement**. Refer to the [SNF 3-Day Rule Waiver Guidance](#) for executed SNF Affiliate Agreement requirements.

AGREEMENTS

The first page and signature page of the executed ACO participant agreement and SNF affiliate agreement must be submitted when adding an ACO participant or SNF affiliate. **All agreement submissions must adhere to the following:**

- Include the first page of the agreement identifying all parties and the completed signature page.
- Be signed (handwritten or digital¹ signatures are acceptable) by a legally authorized contact to bind the ACO participant/SNF affiliate on behalf of the ACO.

Important

To avoid common errors, check that all executed agreements clearly state the correct ACO legal entity name and ACO participant/SNF affiliate LBN (as indicated in PECOS). Do NOT enter the trade or “doing business as” name.

Questions?

If you have any questions about ACO-MS or require technical assistance, click the SSP Helpdesk icon (located within the [ACO-MS](#) banner) or email SharedSavingsProgram@cms.hhs.gov.

¹ Digital signatures, which provide authentication methods (e.g., using unique digital certificates) that link the identity of the signatory to the signature itself, differ from electronic signatures, which allow for any mark (e.g., a typed name) that was adopted by the signatory to demonstrate their explicit authorization. The Shared Savings Program does not accept electronic signatures.