

**REQUIRED PUBLIC DISCLOSURE DOCUMENT - ACO PARTICIPATION WAIVER
PIONEER VALLEY ACCOUNTABLE CARE, LLC (“PVAC”)**

PVAC has entered into a Next Generation ACO Model Participation Agreement with the Centers for Medicare and Medicaid Services (“CMS”), effective January 1, 2016. The Agreement was amended and restated, effective January 1, 2019. CMS and the Office of Inspector General (“OIG”) of the Department of Health and Human Services have jointly issued waivers for specified arrangements involving ACOs participating in the Next Generation ACO Model that waive the application of certain federal fraud and abuse laws, including the federal Anti-Kickback Statute and Physician Self-Referral Law, to certain ACO arrangements.

PVAC’s Board of Managers has duly authorized the arrangements below and made a bona fide determination that such arrangements are reasonably related to “ACO Activities” because they will promote accountability for the quality, cost, and overall care of Medicare beneficiaries aligned with PVAC (“Aligned Beneficiaries”). A description of each arrangement is set forth below for the purpose of PVAC availing itself of the protections afforded under the “Participation Waiver.” This document will be supplemented as additional arrangements arise.

DISCLOSED ARRANGEMENTS

Agreements with Physicians Serving Aligned Beneficiaries in Skilled Nursing Facilities. PVAC has entered into agreements with the physicians identified below, effective as of the date across from each physician’s name. Each physician agrees to assist PVAC with care coordination, performance improvement, implementing care pathways and protocols, and other activities aimed at improving the quality and efficiency of care received by such physician’s patients who are Aligned Beneficiaries residing in skilled nursing facilities.

Name	Effective Date
May A. Awkal, M.D.	01/01/2017
Adnan M Dahdul, M.D.	01/01/2017
Ann Maria L. Elder, M.D.	01/01/2017
Karen M. Hoyt, M.D.	01/01/2017
Fahim A. Kazi, M.D.	01/01/2017
David A. McDougall, D.O.	01/01/2017
Joshua Mintz, M.D.	01/01/2017
Gerald S. Steinberg, M.D.	01/01/2017
Heather Wark, M.D.	01/01/2017

Professional Services Agreement regarding Home Visits: PVAC entered into an agreement with Post Acute Care Clinicians LLC effective August 3, 2017. This medical practice has agreed to provide the services of physicians, nurse practitioners, and physician assistants to perform post-care home visits for Aligned Beneficiaries in order to promote safe and sustainable transitions to home and reduce unnecessary hospital admissions, thereby promoting accountability for the quality, cost and overall care of beneficiaries. The program became operational on October 24, 2017.

Shadow Bundle Agreements: PVAC entered into agreements with the medical practices listed below, effective as of the date across from each practice's name. PVAC and these medical practices have determined that certain Aligned Beneficiaries may benefit from additional care coordination and management during episodes of care in connection with certain medical conditions, as set forth in the agreements. The purpose of the agreements is for PVAC and the providers in the respective medical practices to collaborate to improve the coordination, quality, and efficiency of certain medical services delivered to Aligned Beneficiaries in connection with one or more selected medical conditions, as indicated in the table below. To the extent that this additional care coordination and management results in improved quality and reduced costs for the Aligned Beneficiaries, the medical practices may be eligible for certain shared savings.

Medical Practice Name	Effective Date	Medical Services Covered
Kidney Care and Transplant Services of New England, P.C.	01/01/2018	End Stage Renal Disease
Baystate Medical Practices, Inc.	01/01/2018	Congestive Heart Failure
Baystate Medical Practices, Inc.	01/01/2018	Oncology