

Policy Title: Health Equity Plan			
Department Responsible: THN Operations	Policy Number: OP-011	THN's Effective Date:	Next Review/Revision Date: September 30, 2026
Title of Person Responsible: Director of ACO Operations	THN Approval Council: THN Operating Committee	Date Approved: August 14, 2025	Date Approved by THN Board of Managers:

- I. **Purpose.** The purpose of OP-011 is to outline the policies of THN related to the Health Equity Plan required under the ACO REACH Model.
- II. **Policy.** It is the policy of THN to implement and maintain a Health Equity Plan designed to limit health disparities for underserved populations of beneficiaries, as required under §5.10 of the ACO REACH Model PA.
- III. **Procedures.**
 - A. THN will maintain a CMS approved Health Equity Plan that includes the following:
 1. **Target Health Disparities:** one or more health disparities experienced by one or more Underserved Communities, as defined in the ACO REACH Model PA, that THN or its Designated Representative will aim to reduce, and the data sources used to inform the identification of those Target Health Disparities;
 2. **Health Equity Plan Intervention(s):** the initiative(s) THN or its Designated Representative will create and implement to reduce Target Health Disparities;
 3. **Resource Gap Analysis:** identification of the resources needed to implement THN's Health Equity Plan Interventions and any gaps between current resources and those that will be needed;
 4. **Health Equity Project Plan:** a timeline for the implementation of the Health Equity Plan Interventions;
 5. **Health Equity Plan Performance Measure(s):** one or more quantitative metrics that THN or its Designated Representative will use to measure the reductions in Target Health Disparities arising from the Health Equity Plan Interventions; and
 6. **Health Equity Goals:** targeted outcomes related to the Health Equity Plan Performance Measures for each Performance Year, including how THN or its Designated Representative will use Health Equity Goals to monitor and evaluate progress in reducing Target Health Disparities
 - B. **Material Health Equity Plan Amendment:** The following changes to the Health Equity Plan must be submitted to CMS for approval prior to implementation. Changes to:
 1. Health Equity Goals;
 2. Target Health Disparities, including changes to the identified Underserved Communities;
 3. Health Equity Plan Interventions; or



4. Health Equity Plan Performance Measures.

- C. If, at any time, CMS rejects THN’s Health Equity Plan, in whole or in part, no THN Related Individual or its Designated Representative shall conduct any such rejected activity.
- D. Any materials used to educate, notify, or contact Beneficiaries regarding THN’s Health Equity Plan will be deemed Marketing Activities and must be all requirements under OP-002.
- E. THN’s Health Equity Activities do not discriminate against any Beneficiary based on race, ethnicity, national origin, religion, or gender.
 - 1. THN or its Designated Representative may identify Beneficiaries for Health Equity Plan Interventions based on other factors, including medical history, health status, health needs, income, or geographic location, in so far as THN and all THN Related Individuals or Designated Representatives comply with applicable Federal anti-discrimination laws and regulations
- F. **Enforcement.** Participant and Preferred Providers are required to follow all applicable ACO policies, including implementation of Health Equity Plan Interventions and cooperation with monitoring and evaluation processes related to Health Equity Activities. Failure to comply with THN processes, including cooperation in Beneficiary Engagement, Health Equity Activities, and Care Coordination activities, will result in remedial and/or disciplinary actions as appropriate in accordance with ACO Policy: CIT-002.

Date	Reviewed	Revised	Notes
May 2023			New REACH policy
December 2024		X	Added “designated representative”
May 2025		X	Removed HEP progress update requirements
September 2025	X		No changes