

<b>Policy Title:</b> Advanced Payment Option			
<b>Department Responsible:</b> THN Network Development	<b>Policy Number:</b> OP-010	<b>THN's Effective Date:</b>	<b>Next Review/Revision Date:</b> September 30, 2026
<b>Title of Person Responsible:</b> Director Payor Relations and Contracting	<b>THN Approval Council:</b> THN Operating Committee	<b>Date Approved:</b> August 14, 2025	<b>Date Approved by THN Board of Managers:</b>

- I. **Purpose.** The purpose of OP-010 is to outline the policies of THN related to the Advanced Payment Option (APO) available under the ACO REACH Model.
- II. **Policy.** It is the policy of THN to ensure it is meeting all compliance requirements related to its election to participate in the APO for any Performance Year.
- III. **Procedures.**
  - A. If THN elects to participate in the Primary Care Capitation Payment, the ACO may also elect to participate in the APO that Performance Year. This election must:
    1. Apply for the entire Performance Year;
    2. Be submitted in a timely manner, as required by CMS;
    3. Include a complete list of Participants and Preferred Providers that have agreed to participate in the APO at the start of the Performance Year; and
      - a. Participants and Preferred Providers who are added to THN during the Performance Year may not be included in the APO until the start of the subsequent Performance Year.
    4. Include a certification that THN has satisfied the notice and education requirements outlined in Paragraph C, below.
  - B. In order for a Participant or Preferred Provider to be identified as participating in the APO, THN must obtain a fully executed ACO REACH Model: Fee Reduction Agreement and a written APO Payment Arrangement in place which establishes how THN will compensate the Participant or Preferred Provider for Covered Services that are subject to the APO Fee Reduction.
    1. Remuneration furnished by THN under an APO Payment Arrangement are negotiated in good faith and consistent with fair market value.
    2. All APO Payment Arrangements will:
      - a. Require Medically Necessary Covered Services to be made available to Beneficiaries in accordance with all applicable laws and regulations.



- b. Prohibit THN from requiring prior authorization for services furnished to Beneficiaries.
  - c. Prohibit THN Related Individuals from interfering with a Beneficiary's freedom to receive Covered Services from the Medicare-enrolled provider or supplier of his or her choice, regardless of whether the provider or supplier is participating in the APO or with THN.
  - d. Require THN to compensate the Participant or Preferred Provider for APO Eligible Services no later than **30 days** after receiving notice of the processed claim for such services, as indicated in claims data sent by CMS.
  - e. Require the Participant or Preferred Provider to maintain records and provide the government with access to records regarding the APO Payment Arrangement.
  - f. Include the procedures outlined in Paragraph F, below, for requesting reconsideration by THN of a determination regarding compensation.
  - g. Meet the requirements of Section 3.04 of the ACO REACH PA.
- C. THN provides annual notice and education to all Participants and Preferred Providers regarding the ACO's intended participation in the APO. This education includes information regarding the associated APO Fee Reduction for those Participants and Preferred Providers.
- 1. THN emails a Welcome Packet to Participant Providers and Preferred Providers during the Provider Notification process which includes directions on how to access the required provider education materials.
  - 2. Providing a copy of the ACO REACH Model: Fee Reduction Agreement does not constitute notification and education for purposes of this requirement.
- D. **Notice of Termination.** If THN's selection to participate in the APO for a Performance Year is rejected or terminated, THN shall, within 10 days, notify all Participants and Preferred Providers that it is not participating in the APO for that Performance Year or for the remainder of that Performance Year, as applicable.
- E. THN, Participants and Preferred Providers participating in the APO shall maintain records of all remuneration paid or received pursuant to each



APO Payment Arrangement in accordance with **RR-001**.

Date	Reviewed	Revised	Notes
May 2023			New REACH policy
December 2024	X		Revised Section III.C.1
September 2025	X		No changes