

CMMI's Compliance Support for Multiple Models (CSMM) – under RMADA

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Contract Reference #4: CMS Compliance Support for Multiple Models (CSMM)

Size	# FTEs: 44	Contract \$ Value: \$49,044,976	# of End Users: 150,000+
Scope	RELI, as the CMS Compliance Support for Multiple Models (CSMM) contractor, conducts data analysis, trend identification, and pattern analysis to monitor model participant compliance and mitigate risks in model design. Our comprehensive support spans vetting, monitoring, auditing, and analytics for several CMS alternative payment models (APMs), including Accountable Care Organization Realizing Equity, Access, and Community Health (ACO REACH), Primary Care First (PCF), Kidney Care Choices (KCC), and End-Stage Renal Disease (ESRD) Treatment Choices (ETC).		
Complexity	Program support requires a comprehensive understanding of ACO REACH, PCF, KCC, and ETC. Leveraging CMS data systems and platforms such as the IDR, SNOW, OnePI and 4i, we drive data analytic activities in support of compliance, monitoring, and fraud, waste, and abuse (FWA) detection. With expertise in healthcare program integrity screening, risk identification, remedial action issuance and management, and risk mitigation, RELI excels in qualitative and quantitative analytics, audits, and other activities, ensuring compliance while minimizing stakeholder burden.		
Similarity to the SOW	<p>Project Management (C.2). Project management uses a hybrid Lean/Agile approach, efficient meeting planning and execution, meeting agendas and minutes, establishment of a Quality Assurance Plan, and smooth contractor transition processes.</p> <p>Information Gathering (C.3). RELI conducts thorough qualitative and quantitative analytics across diverse data sources (e.g., IDR, PECOS, MDM, OnePI) to provide CMMI with insights into model-associated risks to track leading indicators and to identify and address complex issues. We employ leading indicator analysis, predictive modeling, provider and entity vetting, and environmental scans to identify risks and trends in APMs. Our eCQM and CEHRT ensure accurate model alignment, supported by data from CMS' OnePI portal for informed recommendations.</p> <p>Instrument/Item Development (C.5). We provide strategic guidance and implement multi-dimensional risk framework and risk assessment tools. We track progress on compliance activities visually and provide early trend indicators to CMS, ensuring model participant compliance and early, effective risk mitigation. Our expertise in value-based care and APMs enables us to offer informed recommendations to CMS, minimizing potential difficulties for model participants and quickly bringing them into compliance with requirements.</p> <p>Reports/Approval Packages (C.7). We provide detailed compliance reporting, including the capstone Annual Compliance Report (ACR), the Monthly Contract Report (MCR) as well as audit summary reports at the conclusion of each audit. The ACR covers strategy, compliance activities, data summaries, pending issues, and lessons learned, while the MCR summarizes task status, challenges, completed activities, upcoming plans, and project burn rate details. The audit summary reports provide detailed results of audits, recommendations for CMS, lessons learned, and historical trends of compliance findings.</p> <p>Implementation, Production & Assessment (C.8). We provide risk mitigation tools, RFI and RFR management, and policy suggestions, as well as technical support to reduce burden and ensure compliance. Our auditing, monitoring, vetting, and analytics activities detect noncompliance and FWA risks, enabling proactive measures and rapid resolution of noncompliance. Addressing issues early enhances resource efficiency, lowers costs, improves care quality, and reduces risk to CMS and beneficiaries.</p> <p>Access to Systems/DUA (C.10). RELI established, maintained, and renewed DUAs with CMS, ensuring compliance with CMS policies.</p> <p>QA & Performance Evaluation (C.11). Our Quality Assurance Plan includes establishing measurement objectives, conducting compliance audits, and performing peer reviews to ensure adherence to quality standards. This process ensures reliable and accurate outcomes and meets CMS requirements for quality and performance evaluation.</p>		
Role / Functions / Responsibilities	<p>Knowledge of APM Measures and Methodologies. We conduct audits using established sampling methods, including eCQM and CEHRT audits for primary and specialty care APMs. We review claims data and QRDA III files to ensure alignment of data and use CMS' One PI and IDR for data extraction and analysis, providing informed recommendations to CMS.</p> <p>Clinical Experience and Knowledge. For the CSMM contract, we use clinical expertise in primary and nephrology care to audit eCQMs and conduct other compliance work. We apply advanced data analytics to monitor provider and provider entity behavior. With corporate reach back to over 600 professionals, including researchers, clinicians, and compliance specialists, we ensure thorough and effective compliance work with informed recommendations.</p> <p>Stakeholder Collaboration. RELI provides extensive compliance, monitoring, auditing, and vetting support for 260+ APM entities, 2500+ primary care practices, and >150,000 provider participants across four APMs.</p>		

Period of Performance: 09/24/2020 - 12/24/2026

02/26/2024 – CMS MSSP OSC

RELI Project Name: Compliance Support for Multiple Models (CSMM)	
Name of Company or Agency	Centers for Medicare & Medicaid Services
Project Title and Contract Number	Compliance Support for Multiple Models (CSMM) Prime Contract: 75FCMC19D0094/75FCMC20F0001
Dollar Value per Contract Year and Period of Performance	\$49,044,976.00 TCV Base: 9/24/20-12/24/21 Dollar Value: \$7,579,433.00; O1: 12/25/21-12/24/22 Dollar Value: \$8,757,906.00 O2: 12/25/22-12/24/23 Dollar Value: \$9,962,558.00; O3: 12/25/23-12/24/24 Dollar Value: \$10,421,185.00 O4: 12/25/24-12/24/25 Dollar Value: \$8,755,250.00; O5: 12/25/25-12/24/26 Dollar Value: \$3,568,644.00
Project Description Highlighting Relationship to Work Required by the ACO	
<p>As the prime contractor, RELI provides extensive compliance, monitoring, auditing, and vetting support for 260+ APM entities, 2500+ primary care practices, and over 250,000 providers across four different payment models (ACO REACH, KCC, PCF, and ETC). RELI performs a broad spectrum of compliance-related activities that include provider and entity vetting, monitoring reviews (e.g., BE/BEI reviews, financial guarantee reviews, LBN/TIN/CiC reviews, marketing and descriptive materials reviews, participant website reviews, provider complaints) auditing (e.g., governing body, written arrangement, quality, CEHRT), ongoing risk assessment, and data analytics to identify FWA and issue remedial actions. We also perform Written Arrangement audits of ACOs, Kidney Contracting Entities (KCEs), and KCF Practices to assess whether the model participants' Participant Providers and Preferred Providers (ACO REACH), KCE Participants and Preferred Providers (CKCC), and KCF Nephrology Professionals (KCF) have signed arrangements with the Providers for model participation and payment arrangements and that these agreements satisfy each Model's Participation Agreement requirements. Our Compliance Strategy provides an overarching structure and methodology to perform a range of compliance activities across the four models to verify that model participants, through their operations and activities, comply with the requirements and standards outlined in the model-specific Participation Agreement. Our RMT enables us to identify and prioritize the highest risk activities and model participants, while the RAT provides a standardized, unbiased, and consistent approach to issuing remedial actions. RELI provides extensive technical assistance and education and outreach support to model participants and maintains an Automated Inquiry Management System that efficiently handles a high volume of participant inquiries on CSMM and meets a 10-business day response service level agreement.</p>	
How this Experience will Benefit CMS and Outcomes of MSSP OSC	
<p>RELI's experience and expertise developing and successfully implementing innovative solutions like revolutionized participant vetting and PI screening processes that provide accurate results in a short timeframe focused on level of risks, streamlined BE/BEI (SNF 3 day waiver included), LBN/TIN/CiC, and financial guarantee (all three forms of SSP repayment mechanisms) review processes will provide MSSP OSC standardized, consistent, and faster application results and adjudication process results. RELI brings experience conducting education and outreach activities that primes the ACOs for successful application submissions. RELI's focus on automation and innovation through its proven history of applying innovative technology to CMS programs, will help revamp or refine processes, driving efficiency to establish process and technology frameworks for a future-state SSP. Furthermore, RELI's extensive compliance, monitoring, and auditing, technical assistance, education and outreach, and systems support experience is directly relatable and adaptable to MSSP OSC, reducing chances of errors and improving productivity while innovating in key areas. RELI coordinates cross-contractor collaboration for four models and between 16 and 20 contractor teams guaranteeing successful multi-stakeholder collaboration. This experience will reduce inefficiencies and increase the time available for collaborating with CMS and other stakeholders. We use a strengthened, defensible, risk-based compliance strategy, a defensible and standardized RAT which is instrumental in providing unbiased results, addressing noncompliance across tasks and participants, and proactively monitoring and protecting CMS's interest and the program's integrity.</p>	
Difficulties or Constraints Encountered and How They Were Overcome	
<p>RELI revolutionized the PI Screening approach for the ACO REACH Model. This innovative process delivers definitive risk assessments and recommendations to CMS. By analyzing diverse data sources, we categorize ACOs and related entities as High, Medium, or Low Risk, identifying those requiring further review or exclusion. In preparation for the CEHRT Audit for ACO REACH, RELI swiftly adjusted the sampling methodology following a late change request, securing CMS approval, and ensuring an on-time audit start. During the Governing Body audit for ACO REACH, our experts identified compliance issues beyond the audit's scope. We promptly informed CMS and requested an ad hoc audit, which CMS approved. This provision will be integrated into next performance year's Governing Body Audit. The anticipated CMS system of record for conducting</p>	

compliance activities (4i system Compliance module) was not available during the first three years of the contract. To address this in the short term, RELI worked with CMS to modify workflows and processes without impacting the work or budget while actively supporting CMS in the development of the 4i module before successfully launching and transitioning model participants to the 4i compliance module.

02/29/2024 – CMS RMADA 3 IDIQ Response to: Sources Sought Notice

Assess and monitor potential and/or continuing model participants for program integrity issues.

CMS CSMM, 75FCMC20F0001		
PoP & TCV	Contracting Office POC	Contract PM
9/24/20 -12/24/26 \$49,044,976	Richard Asher, 410-786-4170 richard.asher@cms.hhs.gov	Brad Hove, 402-680-7679 Brad.hove@religroupinc.com
Description of Relevant Services		
Team FedPath has proven experience conducting and analyzing program integrity screenings of APMs, their parent companies, governing body members, and leadership teams; as well as vetting individual participant, providers, and practices for the ACO REACH, KCC, and PCF Model under the CSMM contract. Our team monitors and screens for program integrity issues using varied data sources, including checking for any global or healthcare sanctions, Corporate Integrity Agreements, revocation status, criminal investigations, and fraud, waste, and abuse allegations, investigations, and settlements. Private and public entities participating in the models are screened for risks including negative medical and financial outcomes among Medicare beneficiaries, and losses to federal funds. The ad hoc APM screening conducted supports CMS in making informed, non-arbitrary decisions regarding APMs' participation in a model.		

Provide orientation and ongoing technical assistance to model participants as well as self-administered design plans.

CMS CSMM, 75FCMC20F0001		
PoP & TCV	Contracting Office POC	Contract PM
9/24/20 -12/24/26 \$47,124,436.49	Richard Asher, 410-786-4170 richard.asher@cms.hhs.gov	Brad Hove, 402-680-7679 Brad.hove@religroupinc.com
Description of Relevant Services		
Team FedPath has extensive experience in utilizing ServiceNow (SNOW) to respond to inquiries from APMs on the CSMM contract. We have implemented a triaging and tracking process to ensure timely and accurate responses and have responded to over 3,000 SNOW tickets annually, adhering to the SLA and providing accurate information. In addition, we have		

provided support to APMs in various other ways, including communicating via the 4i Compliance Module, hosting webinars and office hours, drafting FAQ documents, as well as conducting ad hoc calls with model participants to educate them about a variety of compliance-related topics. This technical assistance has been critical in preparing model participants for auditing and monitoring activities, reducing follow-up questions, and increasing timely audit submissions.

Develop operational requirements and systems for sharing data, including processes for administering data use agreements.

CMS CSMM, 75FCMC20F0001		
Description of Relevant Services		
Team FedPath has executed processes for operational requirements and systems for sharing data on the CSMM contract. This includes defining data sharing goals by establishing policies and SOPs on data sharing processes, and establishing a data governance framework (i.e., identifying stakeholders, data management, access control, etc.). We have established data sharing platforms by utilizing RELI secured remote desktop access and SharePoint sites with other model operation contractors while complying with CMS policies and data use agreements (DUAs). Our team has also deployed authentication and authorization processes when accessing platforms with shared data (e.g., RELI secured remote desktop). Team FedPath routinely updates SOPs to support the latest technologies and data sharing processes.		

Develop viable operational requirements for monitoring including, but not limited to providing payment audit support.

CMS CSMM, 75FCMC20F0001		
PoP & TCV	Contracting Office POC	Contract PM
9/24/20 -12/24/26 \$49,044,976	Richard Asher, 410-786-4170 richard.asher@cms.hhs.gov	Brad Hove, 402-680-7679 Brad.hove@religroupinc.com
Description of Relevant Services		
On the CSMM contract, Team FedPath conducts scheduled and ad hoc monitoring using established processes. We use a combination of tools to ensure we are measuring the right risks at the right time. The Compliance Strategy is designed to provide an overarching structure and methodology to perform various compliance activities to ensure APMs comply with the requirements and standards outlined in their Participation Agreement, CMS standards, and other applicable statutes and regulations. The Risk Management Tool (RMT) uses a risk-based approach that enables Team FedPath to identify and prioritize the highest risk activities and model participants, and to focus compliance activities on the areas with the potential for the greatest impact. The RMT provides the framework for potential actions, observations, and identified risks so they can be cataloged, assessed		

in terms of risk level/impact and remedial actions, and mapped to their respective Participation Agreement requirements. The Remedial Action Tool (RAT) provides a standardized tool for Team FedPath to determine the steps to take for addressing diverse types of noncompliance. The purpose of this tool is to provide guidance to CMS to make informed decisions regarding issuing remedial actions while maintaining consistency across activities. The RAT outlines the path Team FedPath follows when recommending, issuing, and tracking remedial actions.

Support data sharing.

CMS CSMM, 75FCMC20F0001		
PoP & TCV	Contracting Office POC	Contract PM
9/24/20 -12/24/26 \$49,044,976	Richard Asher, 410-786-4170 richard.asher@cms.hhs.gov	Brad Hove, 402-680-7679 Brad.hove@religroupinc.com
Description of Relevant Services		
Team FedPath drove and coordinated data sharing efforts on the CSMM contract. This includes executing collaborative data sharing protocols with other Model Operation contractors, to exchange vetting data, alignment data, and participant and beneficiary data for measurement year. These practices have led to efficient and secure data sharing, allowing each contract to have access to critical information when the need it. Team FedPath also utilizes CMS' Integrated Data Repository (IDR), One Program Integrity (One PI) data, 4Innovation (4i) data, SAS EBI, SQL, Python, R, Git Hub, and Tableau for data analyses and sharing data results while following CMS' data suppression policy.		

Provide technical assistance to model sites.

CMS CSMM, 75FCMC20F0001		
PoP & TCV	Contracting Office POC	Contract PM
9/24/20 -12/24/26 \$49,044,976	Richard Asher, 410-786-4170 richard.asher@cms.hhs.gov	Brad Hove, 402-680-7679 Brad.hove@religroupinc.com
Description of Relevant Services		
Team FedPath has extensive experience in utilizing ServiceNow to respond to inquiries from APMs on the CSMM contract, including ACO REACH and KCC. We have implemented a triaging and tracking process to ensure timely and accurate responses and have responded to over 3,000 SNOW tickets annually, adhering to the SLA and providing accurate information. In addition, we have provided support to APMs in various other ways, including communicating via the 4i Compliance Module, hosting webinars and office hours, drafting FAQ documents, as well as conducting ad hoc calls with model participants to educate them about a variety of compliance-related topics. This technical assistance has been critical in preparing model participants for auditing and monitoring activities as well as reducing follow-up questions and increasing timely and accurate audit submissions.		

Conduct routine program monitoring activities.

CMS CSMM, 75FCMC20F0001		
PoP & TCV	Contracting Office POC	Contract PM
9/24/20 -12/24/26 \$47,124,436.49	Richard Asher, 410-786-4170 richard.asher@cms.hhs.gov	Brad Hove, 402-680-7679 Brad.hove@religroupinc.com
Description of Relevant Services		
<p>Team FedPath conducts routine program monitoring across four APMs under the CSMM contract. Both ad hoc and scheduled motoring activities are conducted related to various areas of compliance, including; voluntary alignment plan reviews, descriptive and marketing materials reviews, financial guarantee reviews, benefit enhancements/beneficiary engagement incentives implementation plan reviews, participant websites and required reporting reviews, provider complaints reviews, participant error reviews, model participant aggregation reviews, and minimum beneficiary alignment reviews. In addition, we conduct monitoring activities to track model performance and beneficiary health outcomes, such as routine data analytic activities to monitor patterns and trends of key metrics such as rates of home dialysis and adverse health outcomes to suggest potential opportunities in improving kidney care delivery.</p>		

Maintain critical systems of record.

CMS CSMM, 75FCMC20F0001		
PoP & TCV	Contracting Office POC	Contract PM
9/24/20 -12/24/26 \$47,124,436.49	Richard Asher, 410-786-4170 richard.asher@cms.hhs.gov	Brad Hove, 402-680-7679 Brad.hove@religroupinc.com
Description of Relevant Services		
<p>Team FedPath is experienced in maintaining various systems of record in support of contracts with CMS. On the CSMM contract, we have used Team FedPath and CMS SharePoint sites to store and share critical information with CMS and other contractors. We have also used 4i and CMS Box to collaborate with model participants, CMS, and other CMS contractors. Team FedPath has established protocols to ensure retention of information for as long as required and also data destruction processes to ensure data is removed when it's no longer needed. Team FedPath supported the attainment and maintenance of an Authority to Operate (ATO) for more than 40 CMS Major Applications (e.g., DEX, NPPEs, and ASETT) and a CMS authorized FISMA-compliant General Support Systems Data Center, MRAC, which is used for CMS medical records review and management & CSMM.</p>		

Manage & coordinate activities related to assessment and feedback, use of data for improvement, and measuring performance towards model aims to support and accelerate the ongoing learning of organizations involved in CMS models.

CMS CSMM, 75FCMC20F0001

PoP & TCV	Contracting Office POC	Contract PM
9/24/20 -12/24/26 \$49,044,976	Richard Asher, 410-786-4170 richard.asher@cms.hhs.gov	Brad Hove, 402-680-7679 Brad.hove@religroupinc.com
Description of Relevant Services		
<p>On the CSMM contract, Team FedPath conducts a variety of education and outreach activities designed to promote model participant learning. We conduct office hours and webinars, educating model participants about Participation Agreement (PA) requirements as well as auditing and monitoring activities in support of compliance with PA requirements. During these activities, we field live questions as qualitative data to measure performance and support ongoing learning from model participants. In addition, we have drafted hundreds of articles for inclusion in weekly or bi-weekly newsletters for three different APMs under the CSMM contract, The articles support a broad range of compliance activities and are designed to educate and increase compliance with the PA.</p>		

Tasks may have a period of performance of up to ten years in length. How will your team approach and manage work associated with long task durations?

Team FedPath's approach to staffing and organizing our teams is based on our thorough understanding of the work, the schedule, and the deliverables. Our proactive approach to employee retention significantly reduces staffing risk and our deep familiarity with CMMI models minimizes risk to CMS. Team FedPath is experienced in successfully managing longer durations of CMMI models. The CSMM contract is a six-year contract (one Base Year and Five Option Years). In serving CMMI on this contract, we have brought in a mix of seasoned and junior level staff, providing CMS with the required expertise while also closely monitoring the budget. Our Project Management Plan (PMP), thorough understanding of the Statement of Work (SOW), and our agile approach have ensured success on the contract. Our seasoned Project Managers have the experience and tools necessary to successfully plan and execute long-term staffing plans to provide the most value and least amount of risk to CMS.

Demonstrate through organizational experience, capacity or teaming arrangements that support personnel possess a wide-range of health care and health policy expertise, multi-disciplinary staff, and can adequately staff multiple large and mid-size models at the same time.

Team FedPath has reach back to over 600 staff members including seasoned public health researchers, clinicians, data and clinical analysts, statisticians, software developers, and data scientists experienced in the quality indicator lifecycle—including several Senior Leadership experts with demonstrated expertise in this area. An example of tailoring our staffing approach to meet the needs of the client is on the CSMM contract, where we have assembled a broad team that consists of compliance specialists, audit specialists, attorneys, clinicians, PMPs, data scientists, data analysts, business analysts, project coordinators, technical editors, 508 compliance reviewers, and other professionals.

Demonstrate through organizational experience, capacity or teaming arrangements that support personnel possess a wide-range of health care and health policy expertise, multi-disciplinary staff, and can adequately staff multiple large and mid-size models at the same time.

Team FedPath has reach back to over 600 staff members including seasoned public health researchers, clinicians, data and clinical analysts, statisticians, software developers, and data scientists experienced in the quality indicator lifecycle—including several Senior Leadership experts with demonstrated expertise in this area. An example of tailoring our staffing approach to meet the needs of the client is on the CSMM contract, where we have assembled a broad team that consists of compliance specialists, audit specialists, attorneys, clinicians, PMPs, data scientists, data analysts, business analysts, project coordinators, technical editors, 508 compliance reviewers, and other professionals.

12/21/2023 – CMS ASHEPS

CMS Compliance Support for Multiple Models (CSMM)

Exhibit 1: CMS CSMM Narrative

1. Client Name and Point of Contact	Client: CMS/ Center for Medicare and Medicaid Innovation (CMMI) POC Name and Title: John R. Lumpkin, DSI Division Director and COR Phone: (410) 786-4839 Email: John.Lumpkin@cms.hhs.gov
2. Contract Number	75FCMC20F0001
3. Period of Performance	09/30/2020 - 12/24/2026
4. Role	RELI Group Inc. / Prime
Project Description	
<p>As the prime contractor on the CMS CSMM contract, RELI conducts extensive compliance, monitoring, auditing, vetting, data analytics activities for 260+ alternate payment model entities, 2500+ primary care practices, and over 250,000 providers across four different value-based payment models-accountable care organization (ACO) Realizing Equity, Access, and Community Health Model (ACO REACH), Primary Care First (PCF), Kidney Care Choices (KCC), and End Stage Renal Disease (ESRD) Treatment Choices (ETC). We provide thought leadership specific to the strategic approach and methodological design for the compliance, monitoring, and auditing workstreams, and implement these across workstreams. Our strategic approach provides valuable early indicators and related information to CMS in minimizing and or eliminating potential risks to beneficiaries, and CMS. To verify comprehensive and consistent compliance with program requirements, RELI translates complex participation agreement requirements into actionable assessment steps and implements various auditing, monitoring, and qualitative and quantitative analytics activities to identify noncompliance and fraud, waste, and abuse (FWA) instances. By conducting ongoing leading indicator analysis and environmental scans, we identify potential risks to the models, participants, or beneficiaries and develop and implement measures that prevent potential FWA triggers (PWS 3.4). By conducting extensive market research and proposing various policy and process improvements (PWS 3.1), we enable CMMI's mission and objectives for each payment model to be accomplished, reducing the burden on providers, payers, and patients.</p> <p>RELI has developed tools and processes (PWS 3.1) to identify and investigate potential risks, including a multi-dimensional risk framework tool, remedial action matrix/tool to track and monitor for remedial actions to verify program compliance. We perform a broad spectrum of auditing and monitoring activities including concurrent and simultaneous monitoring (e.g., Financial Guarantee reviews, Benefit Enhancement/Beneficiary Engagement Initiatives reviews, marketing/descriptive material reviews) and auditing (e.g., Voluntary Alignment, Written Arrangement, Governing Body, certified electronic health record technology (CEHRT), Quality Measure Audit), during which we issue requests for information (RFIs) to model participants for submission of various documents to verify compliance with program requirements. In partnership with CMMI, we implemented a new and revised program integrity (PI) screening process to screen providers and entities participating in the model (PWS 3.1). The new PI screening process increased the accuracy and availability of participant screening results, decreased the time</p>	

taken to complete participant screening prior to model start, improved efficiency in the participant screening and selection process, and provided CMS comprehensive information to make informed decision on participant selection, resulting in better provider and participant satisfaction. This approach is recommended for wider CMS adoption. We provide extensive education and outreach support to model participants across 4 models. Our support includes, but is not limited to, conducting webinars and office hours, developing frequently asked questions, checklists, user guides, and templates for various tasks. We provide extensive technical assistance services responding to 150-200 participant inquiries each month to support providers and model participants, ultimately reducing participant burden and promoting successful, compliant model participation.

Relevant Technologies, Architecture, Stakeholders, Tools, or Methods: As the end user of the 4innovation system and compliance module, RELI works with CMS in identifying and providing requirements specific to the compliance module. RELI also identifies opportunities for enhancement from a user perspective and makes recommendations to CMS and the system development contractor. Additionally, RELI leverages and uses various CMS data systems (e.g., CMS IDR, CCW, SNOW, 4i) as well as other open source tools to drive data analytics to support compliance, monitoring, and FWA activities.

1. Identify new system enhancements functionality to support new business needs:

As stated above, RELI identifies potential areas of improvement or enhancement from a usability perspective and provides feedback to CMS and the development contractor.

5. Demonstrate adherence to all Federal requirements to support Information Security Programs and Requirements:

CSMM leverages the CMS Authority to Operate FISMA compliance environment to store Protected Health Information and Personally Identifiable Information related data. This secure environment is also used to conduct analysis. Security practices are in place to adhere to all CMS federal requirements and support compliance with the CMS Information Security Program and its requirements. The CSMM system is compliant with CMS Security requirements (PWS 3.15).

7. Recommending and implementing system enhancements using agile methodology:

RELI employs a hybrid project management approach in which we use principles of Lean, continuous improvement methodology along with Agile tools (PWS 3.13). *The CSMM COR rated us Exceptional in Management on a recent CPAR stating RELI's hybrid project management approach resulted in deliverables that "exceeded expectations" such as developing a new screening process which "entailed planning, developing, implementing and execution of the process and related tools in a fast-moving environment."*

We use dynamic Kanban boards and trackers and collaboration platforms such as SharePoint to conduct compliance, monitoring, and auditing tasks across four value-based care alternative payment models. We conduct several concurrent and simultaneous tasks on the contracts and, therefore, it is critical for the team to follow a project management approach that facilitates transparent and ongoing communication with the client and project teams.

To do so, we leverage Kanban boards (to which the client has full access) to track and monitor a risk and issues log as well as maintain a lesson learned repository to promote efficiency and continuous improvement (PWS 3.1). We developed and maintained a well-documented project management plan and adhered to best practices as defined by the Project Management Body of Knowledge. We maintain close communication through routine project team huddles, standing weekly model-lead and workstream lead meetings, and ongoing communication and collaboration via Microsoft Teams, SharePoint, email correspondence, and ad hoc conversations (PWS 3.14). As noted in the Relevant Technologies, Architecture, Stakeholders, Tools, or Methods section above, RELI provides requirements to the system development contractor and works with CMS in ensuring the module meets the project and stakeholder needs. As the end user of the system, we provide feedback and recommendations for potential improvement from a usability perspective (PWS 3.1).

8. Working with the HIPAA requirements in the Health Insurance Portability and Accountability Act of 1996 and the Patient Protection (HIPAA) and Affordable Care Act (ACA):

RELI is responsible for verifying participants meet the HIPAA requirements outlined in the Model Participation Agreement, monitors, and reports HIPAA breaches or violations to CMS if an entity or provider failed to follow the requirements (PWS 3.8). We do this through ongoing monitoring activities and environmental scans. Upon identification of an incident, RELI follows the steps outlined in the CSMM monitoring SOP to gather details of the incident through RFI issuance, review of documentation, and proposes recommendations working with various CMS stakeholders (e.g., CPI, the Office of General Council).

9. Customer service skills for collaborating with entities during HIPAA compliance reviews and complaint resolutions:

RELI conducts detailed review or investigation of the model participants for HIPAA breaches (PWS 3.6). Upon identification of a breach through voluntary reporting or through ongoing monitoring activities, we inform CMS of the breach and potential next steps to obtain CMS's approval to proceed with an RFI to begin the investigation. We issue an RFI to the participant requesting details on the breach and instruct the entity or provider to complete the CMS security and privacy incident report within the specified timeframe, if not already complete. Our team conducts detailed review of the materials submitted in response to the RFI, identifies the root cause, proposes recommendations to CMS on next steps from a compliant perspective. We work, collaborate, and support other CMS stakeholders as needed in providing information. If necessary and approved, RELI will issue remedial actions based on risk level, continue to monitor the participants for future incidents and verify the proposed mitigation strategy has been implemented. During this review, our team focuses on maintaining complete confidentiality of the issue and associated information gathered, information is only shared with team members that are assisting with the review and is stored in a secure space (e.g., CMS SharePoint) for CMS to access as needed. As part of ongoing compliance education and annual compliance webinar, we educate participants on the importance of HIPAA compliance, participation agreement requirements, and actions to be taken in the event of a breach. This promotes transparent communication and higher self-reporting of such events.

10. Conducting HIPAA transactions and code sets compliance audits and have participated in a compliance program that includes audits and required corrective action plans (CAPs):

RELI conducts several concurrent and simultaneous compliance and program audits (e.g., Voluntary Alignment, Written Arrangement, Governing Body, CEHRT, Quality Measure Audit) in addition to various monitoring activities. We perform trend identification and pattern analysis to assist with early identification and mitigation of noncompliance or FWA activities **PWS 3.4**). Working with CMS stakeholders, we developed and executed a compliance strategy and risk framework that is used to evaluate, analyze, and conduct all compliance, monitoring, and auditing activities. We developed and established a standardized and risk based remedial action matrix/tool for issuing remedial actions such as Notice of Noncompliance (NONC), Warning Letter (WL), and CAPs (**PWS 3.1, 3.7**). The remedial action tool provides consistent documentation and promotes a standardized approach in issuing remedial actions across all participants for any instances of noncompliance with the Participation Agreement (PA) requirements and helps CMS make informed decisions. This risk-based model eliminates bias and provides a consistent and dependable framework that is reliable and efficient. The level of risk determines the type of remedial action issued and our approach accounts for repeated incidences of non-compliance requiring escalation in the type and level of remedial actions. We developed templates for use across the models that include RFI, WL, CAP Request, Audit Findings Report, Termination Letters, and related documents or communications. We maintain an inventory of these templates and ensure version control and timely updates.

13. Conducting compliance review (audit) appeals and assessing civil money penalties:

RELI conducts Written Arrangement Audits to assesses if Participant and Preferred Providers in the model have signed agreements with the model entity for model participation and payment reduction and that these agreements satisfy each Model's PA requirements (**PWS 3.8**). Per the PA requirements, signed arrangements between entities and their Participant and Preferred Providers must be in place before the start of the Model Performance Year; the entity must notify the Participant and Preferred Providers they were approved to participate in the Model and must have a signed Fee Reduction Form. Beyond the Fee Reduction Form, the audit process verifies the required Model PA payment mechanism (e.g., for CKCC, Kidney Transplant Bonus and Chronic Kidney Disease Quarterly Capitation Payment). This verification is to identify model entities with Participant and Preferred Providers who may be unaware of their Model participation or that they have had or will have their claims reduced, potentially without their consent. RELI conducts Quality Measure audit for the PCF Model and failure to pass the audit results in payment implications or withholding, which the participants may appeal. RELI is familiar with the appeal process and supports appeals and reconsideration requests through documentation and discovery to verify CMS has the needed information to respond to the request. Our standardized and formalized review and remedial action tool and audit plan provides CMS with an unbiased approach and results to defend the appeal process.

Additionally, RELI conducts financial guarantee (FG) reviews (e.g., Escrow, Letter of Credit, Surety Bond) to determine if participants comply with requirements outlined in the participation agreement and meet financial obligations if they incur any Shared Losses or Total Monies Owed to CMS. We coordinate with model team staff, the payment contractor, the Business Services Group, and the OFM in cases where an FG demand is required. This activity includes, but is not limited to, drafting, and reviewing FG demand letters, coordinating with the financial institutions issuing the FGs and the respective ACOs or Kidney Care Entities to enable successful withdrawal of the FG and all subsequent compliance level tracking and review status throughout the lifecycle of the FG.

14. Analyzing HIPAA complaints that may be filed by external entities; and evaluating transaction testing results:

RELI conducts provider complaints investigation for a variety of topics such as payment violations, inappropriate payment withholding, lack or absence of written arrangements, data sharing issues or other types of noncompliance (**PWS 3.2**). When an external entity or provider submits a complaint, RELI conducts an initial investigation using the provider or entity complaint review SOP and communicates the results of the initial investigation with CMS within an established service level agreement (SLA). We may contact an entity or provider who reported the complaint, the entity or provider against the complaint was registered through an RFI or through telephone depending on the urgency and severity of the issues reported. This correspondence is documented in a tracker and shared with CMS in addition to a summary report delivered at the conclusion of each investigation. We collaborate with various CMS stakeholders, other contractors, and CMS Regional Officers to determine the final disposition of the complaint and recommendations. The complaint is triaged appropriately within and across various stakeholders so that risk to beneficiaries and CMS is minimized or eliminated.

15. Conducting statistical analysis and regularly reporting complaint and compliance review data on developed standard reports as well as any ad-hoc reporting:

Due to CMS's need for near-real-time assessments of participant compliance within each model as well as across models, RELI provides CMS with dynamic reporting (**PWS 3.9**) that shows actionable and intuitive results and provides a cumulative and summary view of ongoing and completed compliance activities, both in aggregate across models and individually by model. RELI uses a combination of tools such as Kanban boards, the master schedule, and a weekly deliverable- "deliverable index" - that includes links to the trackers for all activities that are completed as well as in progress and any materials that were issued to model participants. The various activity trackers provide CMS summary level and detailed information in both narrative and numerical form for activities including, but not limited to, complaints investigations, compliance activities, and participant inquiry. At the conclusion of each auditing and monitoring activity, we submit a summary report or audit report as appropriate which details trends over time across model years, model participants, and other details identified and agreed upon with the COR and Government Task Leads. We capture ad hoc requests on the Kanban board and use a priority level to triage these requests in a timely manner. In addition to the various methods described above for reporting, we submit a detailed Monthly Status Report that includes model level and cross model level statistics, accomplishments, risks, and lessons learned. We also

maintain and track SLAs for all our tasks which are monitored by the project team and adhered to as part of RELI's corporate compliance requirements.

12/06/2023 - Medicare Shared Savings Program (MSSP) Operational Support Contractor

MSSP Capability Requirement	RELI Response
ACO Evaluation and Adjudication	ACO Evaluation and Adjudication For CSMM, RELI evaluates and adjudicates ACO applications. For Compliance Support for Multiple Models (CSMM), RELI excels in evaluating and adjudicating ACO applications, participant agreements, and supporting documentation. Our expertise includes risk framework development, program integrity screening, and auditing activities to verify compliance. Our streamlined submission and review process enables our team to adapt to evolving Model PAs/Final Rules during performance years. We leverage our experience in Governing Body audits and termination processes to support effective program management.
Compliance Reporting	RELI is adept at developing, maintaining, and analyzing compliance reports. Our reports align with CMS requirements, offering valuable insights into ACO compliance. We prioritize accuracy, relevance, and timeliness, making our reports indispensable tools for strategic decision-making. For CSMM, RELI excels in compliance, monitoring, auditing, and risk assessment activities. Our standardized risk-based remedial action matrix/tool enables consistency when addressing noncompliance, providing CMS the ability to make informed decisions.
Automated Inquiry Management System	RELI has successfully implemented, managed, and maintained automated inquiry management systems, fostering transparency and efficiency. We manage a high volume of participant inquiries on CSMM, meeting a 10-business day response service level agreement.

Commented [CC1]: We don't do this on CSMM. Do we need to speak to quals RE: eval and adjudication?

Commented [LH2R1]: Per Brad Hove, PM comment above, we don't do that work. See PP writeup in MSSP OSC proposal Feb 2024.

Specific Related Corporate Experience

B.1 CMS CSMM Experience

Compliance Support for Multiple Models (CSMM)		
A	Period of Performance	09/30/2020 - 12/24/2026
B	Description of Tasks Performed and Experience Gleaned: RELI provides extensive compliance, monitoring, auditing, analytics, and vetting support for 260+ Alternative Payment Model (APM) entities, 2500+ primary care practices and >250,000 providers as participants across four different payment models under the RMADA CSMM task order.	

These models include ACO REACH (formerly known as Global Professional Direct Contracting), Primary Care First (PCF), Kidney Care Choices (KCC), and ESRD Treatment Choices (ETC), encompassing both primary care and specialized clinical domains. We provide thought leadership specific to the strategic approach and methodological design for the compliance, monitoring and auditing workstreams. The implementation of our strategic approach provides valuable early indicators and related information to CMS in minimizing and or eliminating potential risks to beneficiaries, and CMS.

Our work enables participant compliance with all participation agreement and/or final rule requirements and extends to the development and implementation of a multi-dimensional risk framework tool to proactively identify and investigate potential and actualized risks within and across the four payment models. Progress within and across these workstreams is tracked visually and displayed using a combination of dashboards, project plans, and Kanban boards to inform CMMI leadership in real-time. RELI developed and implemented a multi-dimensional risk framework tool to proactively identify and investigate potential and actualized risks within and across four value-based care alternative payment models, encompassing both primary care and specialized clinical domains (e.g., kidney disease).

RELI is responsible for developing the plan and approach for predictive modeling to identify Fraud, Waste and Abuse (FWA) triggers on the ETC model. We have value-based care and payment SMEs that bring a deep understanding of the models that provides recommendations to CMS on potential unintended consequences of model design. These SMEs work closely with CMMI to provide recommendations to mitigate risk and monitor for potential beneficiary harm. This expertise provides CMMI with insight into potential difficulties model participants may have in adhering to participation agreement requirements.

11/21/2023 – CMS CDAC

Contract Name	Customer Name	Customer POC	Total Contract Value	Period of Performance	Is there a CPARS available?
Compliance Support for Multiple Models (CSMM)	Centers for Medicare & Medicaid Services (CMS) Center for Medicare & Medicaid Innovation (CMMI)	John Lumpkin, COR 410-786-4839 john.lumpkin@cms.hhs.gov	\$47,124,436	09/24/20 - 12/24/26	Yes

Description of Services: RELI is responsible for providing extensive compliance, monitoring, auditing, analytics, and vetting support for 260+ APM entities, 2500+ primary care practices and >250,000 providers as participants across four different payment models under the RMADA Compliance Support for Multiple Models (CSMM) task order. These models include ACO REACH (formerly known as Global Professional Direct Contracting), Primary Care First (PCF), Kidney Care Choices (KCC), and ESRD Treatment Choices (ETC). RELI conducts leading indicator analysis and predictive modeling on the ETC model, analyzes provider/participant level metrics, beneficiary demographics and socioeconomic datasets; compares cohort data and trends using claims data from IDR and CCW, operational data or data extracts from other contractors as appropriate. We leverage a variety of data sources to provide CMMI with a holistic view of the Models, identify risk, track leading indicators, and solve complex issues. RELI developed, implemented and maintains a multi-dimensional risk framework tool to proactively identify and investigate potential and actualized risks within and across four value-based care alternative payment models, encompassing both primary care and specialized clinical domains (e.g., kidney disease). RELI performs leading indicator analysis, including using claims data to derive overall trends and evaluate

potential influence on APMs. RELI performs environmental scans to detect areas and/or activities related to fraud, waste, and abuse (FWA). RELI is experienced in importing, securing, and managing large data files to support the CSMM contract. Our data analytics team downloads, merges, and stores data from the IDR, PECOS, NPES, the Master Data Management System, and other systems containing alternative payment model (APM) data. Our team is skilled in using data to perform in-depth analyses that relate APM design attributes to Model participant behaviors.

08/21/2023 – CMS MLN

Our technical assistance support in the CSMM project includes various education and outreach activities, such as written materials, webinars, and telephone consults. RELI has supported large-scale monitoring, compliance, and auditing tasks across four payment models, has in-depth knowledge of hospital cost reports/apportionment methodologies from experience supporting a MAC and through OMB Circular A-76 work. RELI provides CMS with exceptional expertise in content development, education and outreach, technical assistance, policy, evaluation, and quality/performance measurement.

06/08/2023 – CMS - BRIA

On the Compliance Support for Multiple Model (CSMM) contract, RELI handles extensive compliance, monitoring, auditing, and vetting for 260+ APM entities, 2500+ primary care practices, and over 200,000 providers across four models. We implemented a program integrity screening process in partnership with CMMI, which enhanced the accuracy and speed of participant screening, improved process efficiency, and enabled CMS to make more informed participant selection decisions. This process increased the accuracy and faster availability of participant screening results, decreased the time taken to complete participant screening prior to model start, improved efficiency in the participant screening and selection process, and provided CMS comprehensive information to make informed decision on participant selection, resulting in better provider and participant satisfaction. This approach has been recommended for wider CMS adoption.

We have developed tools and processes to identify and investigate potential risks, including a multi-dimensional risk framework tool. We issue, track, and close out various types of RFIs for auditing and monitoring activities. These RFIs help identify noncompliance areas and inform CMMI recommendations.

Our experts make suggestions to mitigate potential risks and monitor for unintended consequences, providing insights into participant difficulties and suggestions for policy changes. Many of these recommendations have been implemented across models. We also provide extensive technical assistance services, education, and outreach activities, including webinars, to support providers and model participants, ultimately reducing participant burden and promoting successful, compliant model participation.

To ensure comprehensive and consistent compliance with program requirements, RELI translates complex participation agreement requirements into actionable assessment steps and implements various auditing, monitoring, and qualitative and quantitative analytics activities to identify

noncompliance and FWA instances. By conducting ongoing leading indicator analysis and environmental scans, RELI is able to identify potential risks to the models, participants, or beneficiaries and develop and implement measures that prevent potential FWA triggers. By conducting extensive market research and proposing various policy and process improvements, RELI ensures that CMMI's mission and objectives for each payment model are accomplished, reducing the burden on providers, payers, and patients.

By identifying and addressing these issues early on, the risk of FWA can be minimized, ultimately reducing the burden on all parties involved, including providers, payers, and patients. By reducing the risk of FWA, resources can be used more efficiently, which can lead to lower healthcare costs and improved access to care for patients. Additionally, addressing FWA can improve the quality of care by ensuring that patients receive the appropriate care they need without unnecessary or harmful treatments.

Overall, RELI's work in providing compliance support for multiple CMS models helps ease the burden on providers, payers, and beneficiaries by ensuring compliance with regulations, reducing improper payments, improving the quality of care, enhancing patient trust, reducing administrative burden, improving healthcare access, and reducing FWA. RELI has gained insights on avoidable burden through our work on providing compliance support.

05/24/2023 – CMS SNF VBP SSN

2. The scope of the contract will be up to 15,000 medical chart audits from 1,500 SNFs a year. To this effect, the contractor shall be able to demonstrate their capability to develop a sampling and scoring methodology for their abstractions and reliability reports, showing exemplary performance in the past with such data.

Contract Name & Number	Role	Customer Name	Customer POC	Total Contract Value	Period of Performance
75FCMC20F0001 Compliance Support for Multiple Models (CSMM)	Prime	CMS	John Lumpkin, 410-786-4839 john.lumpkin@cms.hhs.gov	\$47,124,436	09/24/20 - 12/24/26
<p>Description of Relevant Services: RELI provides extensive compliance, monitoring, auditing, and vetting support for 260+ APM entities, 2500+ primary care practices and >150,000 providers as participants across four different payment models under the RMADA Compliance Support for Multiple Models (CSMM). These models include ACO REACH (formerly known as Global Professional Direct Contracting), Primary Care First (PCF), Kidney Care Choices (KCC), and ESRD Treatment Choices (ETC).</p> <p>On the CSMM contract, we conduct scheduled and ad hoc audits using an established sampling methodology for a minimum of three to five percent of the entities and/or providers. We follow a risk-based sampling approach, leveraging the risk profile and risk framework developed as part of the contract. Specifically, RELI conducts electronic Clinical Quality measure (eCQM) and Certified Electronic Health Record (CEHRT) system audits for the PCF model that includes extraction of QRDA III files, EHR data from ONC website and compares them against information submitted by model participants. We also perform targeted clinical appropriateness reviews of medical record and claims data, to assess billing code appropriateness, monitor leading indicator outcomes, and identify any supporting documentation to substantiate the services billed. Our experts and analysts use CMS' One Program Integrity (One PI) portal as the access point for centralized CMS Medicare Part A, Part B, Part D, and Medicaid</p>					

data to support data extraction and create processes used to develop datasets used for informing recommendations to CMS specific to the participant vetting process using highly sensitive law enforcement information.

4. The Validation Contractor should be able to demonstrate the capability to collect clinical information from medical records and/or other source documents and enter these data into CMS approved software and/or other system approved by CMS.

Contract Name & Number	Role	Customer Name	Customer POC	Total Contract Value	Period of Performance
75FCMC20F0001 Compliance Support for Multiple Models (CSMM)	Prime	CMS	John Lumpkin, 410-786-4839 john.lumpkin@cms.hhs.gov	\$47,124,436	09/24/20 - 12/24/26
<p>Description of Relevant Services: RELI provides extensive compliance, monitoring, auditing, and vetting support for 260+ APM entities, 2500+ primary care practices and >150,000 providers as participants across four different payment models named, ACO REACH (formerly known as Global Professional Direct Contracting), Primary Care First (PCF), Kidney Care Choices (KCC), and ESRD Treatment Choices (ETC).</p> <p>RELI conducts electronic Clinical Quality measure (eCQM) and Certified Electronic Health Record (CEHRT) system audit for PCF model that includes extraction of QRDA III files, EHR data from the Office of the National Coordinator (ONC) website and compares against information submitted by model participants to ensure participants met the requirements outlined in the participation agreement. To select practices for eCQM audit, RELI conducts analysis of 20 plus risk factors. RELI uses CMS claims data, participant vetting data from CMS OnePI, practice roster, and other qualitative data points submitted by other contractors for applicable performance years. This data is carefully abstracted and uploaded to RELI's FISMA complaint site for detailed analysis and risk determination. Upon completion of analysis, SMEs review and validate the analytics results with CMS, obtain approval of analytics results as well as the audit sample practices based on risks following an established timeline to begin planning for the audit. This audit and all other audit activities on the contract follows a rigorous timeline as the results have implications on timing of payment, issuance of Shared savings for model participants as well as identifying organizations that may pose a risk to CMS' programs. Participants with medium to high risk are placed on a remedial action such as a Corrective Action Plan or receive a Warning letter wherein the organization responds to CMS' request to provide a plan within a required timeline for ensuring success of the program.</p> <p>On ETC and PCF models, RELI performs extensive quantitative and qualitative data analytics. ETC Model leading indicator analysis summarizes provider level metrics and compares cohort data and trends. This information included beneficiary demographics and socioeconomic datasets. These indicators present a substantial risk to the Model(s), the participants, or Beneficiaries, including potential risks of fraud, waste, and abuse (FWA) or beneficiary harm. Our experts and analysts use CMS' One Program Integrity (One PI) portal as the access point for centralized CMS Medicare Part A, Part B, Part D, and Medicaid data to support data extraction and create processes used to develop datasets used for informing recommendations to CMS specific to the participant vetting process using highly sensitive law enforcement information.</p>					

8. The Validation Contractor should be able to demonstrate the capability of sharing all improvement information and ideas with CMS and other entities as requested by CMS to continually improve the services provided to the QIOs and other affiliated entities. The validation contractor shall demonstrate their capability to maintain a record of method improvements that can be documented as having savings and/or intrinsic value. Experience outside of CMS which is of similar size and scope is acceptable.

Contract Number	Role	Customer Name	Customer POC	Total Contract Value	Period of Performance
75FCMC20F0001 Compliance Support for Multiple Models (CSMM)	Prime	CMS	John Lumpkin, 410-786-4839 john.lumpkin@cms.hhs.gov	\$47,124,436	09/24/20 - 12/24/26
<p>Description of Relevant Services: RELI Group provides compliance, monitoring, auditing, vetting, and data analytics support to four different CMMI payment models. RELI's work across these workstreams includes thought leadership specific to the development of the strategic approach, methodological design, and development of a risk profile for each participant using the risk framework. We implement each strategic approach and provide valuable early indicators and related information to the CMS Innovation Center leadership team—minimizing and or eliminating potential risks to beneficiaries, the models, and CMS. RELI uses Lean and Agile tools to manage the multiple tasks and deliverables. We developed a Kanban board to track and monitor activities and deliverables for each model. This Kanban board is used in client meetings to demonstrate barriers, progress, and accomplishments of the varied tasks and deliverables.</p> <p>RELI provides CMMI with expert model and payment SMEs that bring a deep understanding of the models as well as potential unintended consequences of model design. Our SMEs work closely with CMMI to provide recommendations to mitigate risk and monitor for potential beneficiary harm. This expertise provides insight into potential difficulties model participants may have in adhering to participation agreement requirements.</p> <p>At the conclusion of the various auditing and monitoring activities, RELI develops and submits a CMS facing report, entity facing report, and a lessons learned document. The CMS report includes the results of auditing or monitoring activity and provides detailed recommendations for mitigation of non-compliances identified. The entity facing report for each of the auditees covers their compliance with the program, any non-compliance areas, and remedial actions recommendations to address the non-compliance issues. We update and maintain a lesson learned registry which aggregates all lessons learned documents across various activities and submits to CMS for consideration for implementation.</p>					

9. The Validation contractor should be able to demonstrate their capability of operating a technical help desk support process, with call trend analysis reporting.

Contract Number	Role	Customer Name	Customer POC	Total Contract Value	Period of Performance
75FCMC20F0001 Compliance Support for Multiple Models (CSMM)	Prime	CMS	John Lumpkin, 410-786-4839 john.lumpkin@cms.hhs.gov	\$47,124,436	09/24/20 - 12/24/26
<p>Description of Relevant Services: RELI Group provides compliance, monitoring, auditing, vetting, and data analytics support to four different CMMI payment models. As part of the CSMM contract, RELI Group provides ongoing technical assistance to model participants and CMS for all compliance-related inquiries. Our team uses the CMS Service Now (SNOW) help desk system to address and track all inquiries. On an average the team responds to 300 inquiries per month with varying levels of intensity, details, and topics, provides responses within a 10-day Service Level Agreement, tracks, trends, and reports to CMS on a weekly monthly and annual basis. Furthermore, RELI provides regular updates to CMS through meetings and reports, depending on the circumstance. Our technical assistance support also includes various education and outreach activities, such as webinars, office hours, written materials like FAQ, Checklists, guidance documents. RELI also provides telephone consults for provides as needed.</p>					

04/14/2023 - Centers for Medicare & Medicaid Services (CMS) Chronic Conditions Warehouse (CCW) Virtual Research Data Center (VRDC)

2. Describe your knowledge and experience with database development.

Compliance Support for Multiple Models (CSMM)	
Contract Name	Compliance Support for Multiple Models (CSMM)
Contract #	75FCMC20F0001
Contracting Organization	Centers for Medicare & Medicaid Services (CMS) Center for Medicare & Medicaid Innovation (CMMI)
Funding Amount	\$55,263,585
Prime Contractor	RELI Group, Inc.
<p>Highlights of our work: RELI performs data analysis, trend identification, and pattern analysis on the CSMM project. We provide compliance support for several CMS healthcare models that cover a broad spectrum of compliance-related activities such as vetting, monitoring, auditing, and analytics. This project requires a deep understanding of four CMS Center for Medicare & Medicaid Innovation (CMMI) models and their requirements. Models covered under this contract include the Direct Contracting (DC) Model, Primary Care First (PCF) Model, Kidney Care Choices (KCC) Model, and the End-Stage Renal Disease (ESRD) Treatment Choices (ETC) Model. RELI uses various CMS data systems (e.g., CMS Integrated Data Repository (IDR), Chronic Conditions Data Warehouse (CCW), ServiceNow (SNOW) to drive data analytics to support compliance, monitoring, and FWA activities.</p>	
<p>Detailed Description of Services:</p> <ul style="list-style-type: none">RELI's support on the four models encompasses 270+ APM entities and approximately 35,000 provider practices nationally. In addition, RELI is responsible for developing the plan and approach for predictive modeling to identify Fraud, Waste and Abuse (FWA) triggers.RELI drives improvements to traditional compliance, monitoring, and auditing strategies, and implements those strategies within and across each of the four APMs. We develop and implement approaches driven by a multi-dimensional risk framework, coupled with qualitative and quantitative analyses; medical record review and financial and legal analyses; and data visualization and dashboard creation.We are responsible for developing the plan and approach for predictive modeling and we perform quarterly environmental scans to identify FWA triggers and incidents using various	

sources (e.g., Office of Inspector General (OIG), Government Accountability Office (GAO), List of Excluded Individuals/Entities (LEIE) database searches, google alerts).

04/11/2023 – RMADA2 - ET3 Datacall

RELI Inc.	Group, Compliance Support for Multiple Models (CSMM)		
Contract No.	75FCMC20F0001	Value & Type	\$55,263,585 / CPFF
Agency Address	Centers for Medicare & Medicaid Services 7500 Security Boulevard, Baltimore, MD 21244	Technical Contact	John Lumpkin, COR 410-786-4839 john.lumpkin@cms.hhs.gov
Role	Prime Contractor	Status	In Progress
CPARS	Yes	Period of Performance	09/24/20 - 12/24/26

Project Highlights

- RELI conducts a combination of qualitative and quantitative analytics across various data sources (e.g., IDR, CCW, PECOS, MDM, OnePI, 4i) to provide CMMI insights into risks associated with the Models covered under the contract. We tap into a variety of data sources to provide CMMI with a holistic view of the Models, identify risk, track leading indicators, and solve complex issues.
- RELI developed, implemented and maintains a multi-dimensional risk framework tool to proactively identify and investigate potential and actualized risks within and across four value-based care alternative payment models, encompassing both primary care and specialized clinical domains (e.g., kidney disease).
- RELI performs leading indicator analysis, including using claims data to derive overall trends and evaluate potential influence on APMs.
- RELI performs environmental scans to detect areas and/or activities related to fraud, waste, and abuse (FWA).
- RELI is experienced in importing, securing, and managing large data files to support the CSMM contract. Our data analytics team downloads, merges, and stores data from the IDR, PECOS, NPPEs, the Master Data Management System, and other systems containing alternative payment model (APM) data. Our team is skilled in using data to perform in-depth analyses that relate APM design attributes to Model participant behaviors.

Relevance to SOW

RELI's work across the compliance, monitoring, auditing and participant vetting workstreams includes thought leadership specific to the development of the strategic approach, methodological design, and risk framework for each operational workstream. In addition, RELI is responsible for developing the plan and approach for predictive modeling to identify Fraud, Waste and Abuse (FWA) triggers. We implement each strategic approaches and provide valuable early indicators and related information to the CMS Innovation Center leadership team—minimizing and or eliminating potential risks to beneficiaries, the models, and CMS.

RELI provides CMMI with expert model and payment SMEs that bring a deep understanding of the models as well as potential unintended consequences of model design. These SMEs work closely with CMMI to provide recommendations to mitigate risk and monitor for potential beneficiary harm. This expertise provides CMMI with insight into potential difficulties model participants may have in adhering to participation agreement requirements.

Leading indicator analysis summarizes provider level metrics and compares cohort data and trends. This information included beneficiary demographics and socioeconomic datasets. For each Model, the CSMM contractor has identified several leading indicators listed below. These indicators present a substantial risk to the Model(s), the participants, or Beneficiaries, including potential risks of fraud, waste, and abuse (FWA) or beneficiary harm.

Environmental scans are used to detect areas and/or activities that could exploit vulnerabilities in the models' design and introduce additional risks. Environmental scans support monitoring of a variety of program integrity risk areas, including but not limited to, legal and regulatory, financial, and beneficiary harm.

Description of Contract and Our Solutions

As a trusted CMS partner, RELI currently provides extensive compliance, monitoring, auditing and vetting support for 260+ APM entities, 2500+ primary care practices and >150,000 providers as participants across four different payment models under the RMADA Compliance Support for Multiple Models (CSMM) task order. These models include ACO REACH (formerly known as Global Professional Direct Contracting), Primary Care First (PCF), Kidney Care Choices (KCC), and ESRD Treatment Choices (ETC).

RELI performs data analysis, trend identification, and pattern analysis as a large part of the Monitoring Participant Compliance and Mitigating Risks in Model Design portions of the work. Our compliance support for several CMS healthcare models covers a broad spectrum of compliance-related activities that include vetting, monitoring, auditing and analytics. The CSMM project requires a deep understanding of four CMS Center for Medicare & Medicaid Innovation (CMMI) models and their requirements. Models covered under this contract include the Direct Contracting (DC) Model, Primary Care First (PCF) Model, Kidney Care Choices (KCC) Model, and the End-Stage Renal Disease (ESRD) Treatment Choices (ETC) Model.

Our solutions and work products are driven by RELI developed (and CMMI approved) strategic design documents as well as analytic, compliance and audit plans. Each design and plan document has associated Standard Operating Procedures (SOPs) to ensure the work is implemented accurately and with the highest level of integrity and quality.

See project highlights section for additional details and examples of our work products/solutions.

03/16/2023 – CMS - Marketplace Independent Testing - Response to: Market Research Request

CMS Compliance Support for Multiple Models (CSMM)

RELI is the prime contractor for CMMI's Compliance Support for Multiple Models (CSMM) project and developed a comprehensive plan to conduct compliance support services including various monitoring and auditing services to CMS across four value-based care alternative payment models. RELI's support on the four models encompasses 270+ APM entities and approximately 35,000 provider practices nationally. In addition, RELI is responsible for developing the plan and approach for predictive modeling to identify Fraud, Waste and Abuse (FWA) triggers.

#1 - What is your approach to leading the implementation of an independent testing transformation effort involving multiples Application Development and System Integration Contractor teams, managed by separate organizational components at various stages of evolution to SAFE Agile among other methodologies, recognizing the cultural challenges associated with such an organizational transformation?

- **Holistic Testing:** Implementing a "holistic testing" approach for independent testing yields greater results. RELI successfully performed independent testing for three projects - CMS Compliance Support for Multiple Models (CSMM), Post-Acute Care (PAC) Quality Report Project (QRP) & Doctors and Clinicians (DAC) while actively collaborating with various application development and system integration contractors as well as various agencies within CMS that resulted in positive results.

#3 - What is your approach to assessing the current environment to create and evolve from a white box testing approach. Implement a tailorable role based black box testing approach.

White Box Testing Approach

- Internal Design Knowledge: On the CSMM contract, RELI Group is the compliance contractor and end user of the 4innovation System and Compliance Module. We have integral knowledge of the internal design needs, and therefore are able to effectively provide requirements and analyze the functionality during various stages of development, including sprint sessions and testing phase, to support continuous improvement.

01/30/2023 – CMS FSSE

Demonstrated experience in the ability to store, retrieve and analyze data files, provide documentation, recommendations, resolutions in reports and other documents in reports and other data activity request using the most cost-efficient and timely methods.

Compliance Support for Multiple Models (CSMM): As a prime contractor to the CMS Center for Medicare and Medicaid Innovation (CMMI), RELI is using a wide range of analytic methods to provide CMS with compliance support across four innovation center Alternate Payment Models (APMs). This work requires a combination of vetting, compliance, monitoring, and auditing services using a variety of large CMS data systems such as the Integrated Data Repository, Chronic Condition Warehouse, Virtual Research Data Center, and One Program Integrity, NPPES, APM participation agreements, etc. RELI has developed a comprehensive, multi-dimensional risk assessment framework and tool to proactively identify and investigate potential and actualized risks. RELI has created analytics to minimize risk to the model, model participants, the Medicare trust fund, and Medicare beneficiaries. The analytics encompass both qualitative and quantitative analyses including participant interviews, participant agreement review and assessment, medical record review, statistical analyses, quality measure and care delivery audits etc. This extends to legal and financial analysis, and complex regression analyses and predictive modeling specifically to identify Medicare fraud, waste and abuse and/or significant non-compliance with model participation requirements.

03/10/2023 - CMS Health Insurance Marketplace and Financial Management Operational Analytics (OA) RFQ

CMS CMM I	75FCMC19D00 94 75FCMC20F00 01	Richard Asher 410-786- 4170 richard.asher	\$44,342,013. 00	Base: 9/24/20 - 9/23/21 O1:	RELI Group provides compliance support	Y – This support covers a broad spectrum	Quality: Satisfactory Schedule: Satisfactory
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	Compliance Support for Multiple Models (CSMM)	@ cms.hhs.gov		9/24/21 - 9/23/22 O2: 9/24/22 - 9/23/23 O3: 9/24/23 - 9/23/24 O4: 9/24/24 - 9/23/25 O5: 9/24/25 - 9/23/26	for several CMS healthcare models.	of compliance-related activities that include vetting, monitoring, auditing and analytics. Models covered under this contract include the Direct Contracting (DC) Model, Primary Care First (PCF) Model, Kidney Care Choices (KCC) Model, and the End-Stage Renal Disease (ESRD) Treatment Choices (ETC) Model.	Cost Control: Satisfactory Management: Very Good
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12/22/2022 – CMS FCHIP

Program Support Plan: RELI is the prime contractor for CMMI's CSMM project and developed a comprehensive plan to conduct compliance support services, including various monitoring and auditing services to CMS across four value-based care alternative payment models. RELI's support on the four models encompasses over 270 APM entities and approximately 35,000 provider practices nationally. In addition, RELI is responsible for developing the plan and approach for predictive modeling to identify Fraud, Waste and Abuse (FWA) triggers. Team RELI will use the expertise it has developed over the course of CSMM work as a guide during the development of the FCHIP Program Support Plan. In addition, Team RELI's combined experience in developing and implementing monitoring and compliance support plans across models and stakeholders,

coupled with our rural and FCHIP-specific program knowledge, will inform the development and maintenance of the program support plan within this task to ensure a more responsive support plan.

Technical Assistance: RELI provides TA to model participants in all areas of compliance on an ongoing basis through responding to participant inquiries that come in via the Service Now (SNOW) Help Desk, or emails that come into the CSMM dedicated email box. In addition, RELI provides TA support prior to, during, and after any type of reviews, audits, etc. Our TA support in the CSMM project includes various education and outreach activities, such as written materials, webinars, and telephone consults.

Assess compliance and performance risks: Under the CMS CSMM contract, RELI is using a wide range of analytic methods to provide CMS with monitoring and compliance support across four innovation center APMs. We developed a comprehensive risk assessment framework and risk management tool to drive and inform compliance and monitoring activities. Our analytic framework provides CMS with more real-time situational awareness, and actionable, proactive, and forward-facing analyses to mitigate the risks associated with each model. Our efforts minimize risk to the model, the model participants, the Medicare trust fund, and Medicare beneficiaries.

Management: on CSMM we manage multiple tasks across four APM models using an integrated team approach that relies heavily on proactive communication, including lessons learned and collaboration across the project model teams and stakeholder participants. We also maintain close communication through routine project team huddles, standing weekly model-lead and workstream lead meetings, and ongoing communication and collaboration via MS Teams, SharePoint, email correspondence and ad hoc conversations.

Team RELI Highlights

- RELI developed customized project support plans for each of seven specialty societies funded by MACRA CATA cooperative agreements.
- RELI developed comprehensive compliance strategy, monitoring, and auditing plans for four models in the CMMI CSMM contract encompassing 270+ APM entities and approximately 35,000 providers.

- On CSMM we meet CMS' desire to have a more detailed view of progress by providing access to the status of activities we are actively working on. By openly communicating and coordinating across tasks and team members, we provide the COR and CMMI leadership with open and transparent communication.

Demonstrated Ability to Identify, Address, Resolve, and Communicate Problems: on CSMM when RELI identified critical discrepancies in payment data, RELI worked proactively to communicate with CMMI and contractors to mitigate the problem. We worked through the details with the contractor for data and for updating/maintaining the system.

Cost, Performance Measurement, and Monitoring (SOW C.6.3)

Team RELI brings

- Experience performing utilization reviews for benefit enhancement waivers using claims data on CSMM.
- Expert monitoring and compliance support across all facets of payment model participation agreements on CSMM.
- ## years' experience auditing cost-reports and quality measures.

07/28/2022 – CMS Office of Personnel Management (OPM) Information Technology Application Support Services: Business Analysis and Quality Assurance

Contract Name	Customer Name	Total Contract Value	Period of Performance
Compliance Support for Multiple Models (CSMM)	Centers for Medicare & Medicaid Services (CMS)	\$47,124,436	09/24/20 - 12/24/26
<p>Brief Description of Services: As the CMS Compliance Support for Multiple Models (CSMM) contractor, RELI performs data analysis, trend identification, and pattern analysis as a large part of the Monitoring Participant Compliance and Mitigating Risks in Model Design portions of the work. Our compliance support for several CMS healthcare models covers a broad spectrum of compliance-related activities that include vetting, monitoring, auditing and analytics. The CSMM project requires a deep understanding of four CMS Center for Medicare & Medicaid Innovation (CMMI) models and their requirements. Models covered under this contract include the Direct Contracting (DC) Model, Primary Care First (PCF) Model, Kidney Care Choices (KCC) Model, and the End-Stage Renal Disease (ESRD) Treatment Choices (ETC) Model.</p> <p>Develop and Support High-Level Business Requirements: On CSMM we have several business analysts with work specific to understanding critical requirements in the compliance, auditing and monitoring space (e.g., model-specific participant agreements that drive the bulk of the project work)</p> <p>Quality Assurance Plan (QAP): The CSMM QAP is a component of our Project Management Plan that details how the RELI Group, Inc. (RELI) performs our contractual requirements and will effectively manage project quality from planning to delivery.</p>			