
“REQUIRED PUBLIC REPORTING”

Michigan Health Corporation (“MHC”) is a non-profit, non-stock membership corporation solely owned and operated by the Regents of the University of Michigan. Pursuant to the document entitled “Medicare Shared Savings Program Waivers: Additional Guidance” as well as the Final Waivers in Connection with the Shared Savings Program Final Rule (collectively referred to herein as the “Guidance”) jointly issued by the Centers for Medicare and Medicaid Services (“CMS”) and Office of Inspector General (“OIG”), this document is intended to satisfy the requirements reflected in the Guidance for the Pre-Participation Waiver. MHC anticipates partnering with other organizations to establish a Track 1 accountable care organization (“ACO”) that will apply to participate in the Medicare Shared Savings Program (“MSSP”) for the 2018 performance year.

Pursuant to the Guidance, MHC is posting this document publicly on a website maintained by the Regents of the University of Michigan.

The Pre-Participation Waiver allows ACOs to enter into various start-up arrangements, including the following: (a) obtaining consultant and other professional support, including legal services; (b) providing infrastructure support; (c) obtaining certain support in furtherance of creating governance and management structure of the new ACO; and (d) providing and obtaining information technology support, including data analytics support. This support will be provided in-kind by the Regents of the University of Michigan in furtherance of the establishment of the new ACO.

The governing body of MHC has made and duly authorized a *bona fide* determination that the arrangement for the provision of start-up support to the new ACO entity is reasonably related to the purposes of the Shared Savings Program, including without limitation, enabling the formation of an ACO that will promote accountability for the quality, cost, and overall care for a Medicare patient population as described in the MSSP. The parties developing the new ACO will develop and retain all documentation referenced in the Guidance in the form and manner reflected in the Guidance and for the duration referenced therein.

Upon formation of the new ACO, the parties creating the new ACO intend the new ACO to adopt a resolution of the Board that represents a *bona fide* determination that the arrangements covered by this Pre-Participation Waiver continue to be reasonably related to the purposes of the Shared Savings Program.”
