

WILEMS RESOURCE GROUP

HEALTHCARE COMPLIANCE CONSULTING

PY 2026



Hi.

“We’re not happy until you’re not happy”

- Wilems Resource Group (WRG) was founded by Kimberly Wilems-Busenbark in 2015 after serving as the acting Compliance Officer for 35 ACOs. Since then, WRG has served as a resource for more than 100 ACOs.
- We’ve been at the forefront of value-based care since the inception of the Medicare Shared Savings Program (MSSP).
- Our team has helped clients navigate compliance in the MSSP, Next Generation ACO Model, Global & Professional Direct Contracting Model, Guiding an Improved Dementia Experience (GUIDE) Model, and the ACO REACH Model.
- We’ve had the unique opportunity to experience first-hand the many challenges Value-Based Organizations encounter related to compliance, engagement, and operations.
- Our team has a proven track record of helping value-based care organizations meet regulatory requirements and educating providers, practice managers, and Medicare Beneficiaries on respective CMS programs and models.



A DIFFERENT TYPE OF CONSULTING FIRM

DON'T BE SCARED

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What We Know

MSSP

ACO
REACH

KCC

GUIDE

ACCESS

What We Do Best

- *Compliance Program Consulting*
 - ACO Compliance Officer
 - ACO Compliance Education for Leadership
 - Compliance Program and Policy & Procedure Creation
 - Compliance Program Management
- *Compliance Program Audits & Reviews*
 - Compliance Program Readiness Reviews
 - SVA Mock Audits
 - Written Arrangement Mock Audits
 - Governance Mock Audits
 - Management of CMS Audit Response
- *Compliant Operations Consulting*
 - SVA Processes & Quality Assurance Reviews
 - Beneficiary & Provider Notification Processes
 - Benefit Enhancement & BEI Implementation & Oversight
 - CEHRT Compliance
- *Compliance Training & Reporting*
 - REACH ACO & Consumer Advocate
 - MSSP ACO & Data Custodian
 - Board Specific Training
 - New for 2026: SVA Training



5 Element ACO Compliance Program



COMPLIANCE

START TO SLEEP AT NIGHT

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Compliance Officer: Kimberly Busenbark

When Kimberly serves as the named compliance officer and WRG the compliance team, we provide support that may include:

- Ongoing Monitoring and Oversight of ACO Compliance Program Requirements
- Regulatory Communication and Updates
- Effective and Compliant Implementation of Operational Requirements
- Creation and Monitoring of Annual Compliance Training Requirements
- Privacy Concerns under the Program/Model
- CMS Liaison Responsibilities
- Investigation, Management and Documentation of Compliance Issues
- Implementation and Documentation of Benefit Enhancements and Waivers
- Marketing Material Requirements and Submission Protocols
- Website and Public Disclosure Requirements
- Documentation and Audit Preparedness for CMS Audits



Compliance Program Creation

- WRG utilizes existing elements and builds a program that works with the operational activities currently in place at the ACO.
- Depending on the needs of the ACO, this may include the creation and implementation of policies & procedures, a monitoring program, and guidance for:
 - Documentation of Governance & Leadership Requirements
 - Privacy Requirements specific to the Program/Model
 - Compliance Document Review & Approval Processes
 - Utilization & Documentation of Benefit Enhancements and Waivers
 - Communication of CMS Notifications & Guidance
 - Compliance Reporting & Investigations
 - Marketing Material Review Processes & CMS Approval
 - Compliance Training Completion
 - Access Management for CMS Systems

Compliance Education for Leadership

- Customized 1 hour training via Microsoft Teams
- Educates ACO Leadership on the compliance program requirements, operational considerations, audit preparedness, best practices, and CMS red flag issues
- Includes open Q&A for attendees



Compliance Resource

Kimberly and the WRG team are available to lend a hand if you need us.

When WRG is a compliance resource, the team is available to:

- Answer questions related to CMS Programs/Models
- Provide guidance on best practices
- Recommend, develop, and implement Corrective Actions
- Assist with audit responses and applications
- Develop template communications for compliance processes



AUDITS & REVIEWS

ENSURE YOUR ORGANIZATION IS AUDIT READY



Compliance Mock Audits

- WRG will conduct a mock audit of the required program elements that mimics a CMS audit.
- Mock Audit Types:
 - ACO Compliance Program
 - Governance
 - CEHRT Requirements
 - Written Arrangements
 - Voluntary Alignment
 - Beneficiary Notifications
 - ACO Roster Management
 - Participant & Preferred Provider Contracting & Notifications Process
 - Benefit Enhancement & Beneficiary Engagement Incentives
- WRG provides a report that the ACO can use to close existing gaps in processes, leverage as documentation for CMS, and implement corrective actions.

Compliance Program Readiness Review

- The Readiness Review will identify gaps in activities and ensure documentation is sufficient to meet minimum regulatory requirements.
- The review will focus on the following:
 - **Compliance with Regulatory Requirements** to ensure the compliance program is sufficient to meet the minimum regulatory requirements outlined in the Shared Savings Program or ACO REACH Model Participation Agreement.
 - **Audit Preparedness** to ensure the ACO is currently documenting the compliance elements sufficiently to pass a Compliance Program Audit.
 - **Practical Implementation** to ensure effective implementation of the elements that are documented in the ACO's Compliance Program.

Mock Audit & Readiness Review Phases

- **Phase 1 Initial Documentation Request:** WRG provides an Initial Document Request.
- **Phase 2 Clarification:** WRG reviews provided documentation and schedules a call with the ACO to confirm understanding of processes where gaps appear to exist, or documentation is unclear.
- **Phase 3 Secondary Information Request:** WRG develops a Secondary Information Request to identify whether specified processes have been implemented and documentation is sufficient.
- **Phase 4 Findings Report:** WRG provides a report that includes the requirement, summary of documentation, finding (e.g., audit risk, compliant, noncompliant), and recommendations or best practice guidance.

TRAINING & REPORTING

MAKE COMPLIANCE TRAINING *LESS* PAINFUL



ACO Compliance Training

- Your ACO should be providing Compliance Training for all individuals providing functions or services related to ACO activities.
- Training should be completed annually and upon hire and/or contracting for those new to the ACO.
- WRG developed this product to help organizations feel less pain when rolling out the required training (because compliance training can never truly be pain-free).

WRG Online Training

- **Easy-Access:** Individuals visit www.wrgtraining.com and enter the ACO username/password to access anytime from anywhere
- **Self-Study:** Individuals read content at their leisure
- **User Attestation:** Individuals don't waste time on quizzes, but attest to completion & understanding of training module content
- **Frequent Updates:** Content is updated often to reflect changes in regulation and new guidance from CMS



How Training Works

- Each ACO receives a single username and password with template instructions to distribute to all ACO-related individuals.
- Once an individual has viewed the training module, they are prompted to complete and submit an attestation. This action confirms that they have read and understand the materials covered by the training module.
- WRG provides the ACO Compliance Officer and/or Leadership access to an Admin page with separate login credentials which allows them to pull attestation completion reports on demand.
- This service will not include data analysis of provider or staff training rosters or direct communication with individuals who are overdue or submitted incomplete attestations. Training gaps must be identified by the ACO.

MSSP ACO Compliance Training

The comprehensive module includes three sections:

1. Medicare Shared Savings Program Overview
 - ✓ ACO 101
 - ✓ Compliance Program Requirements (the 5 elements)
 - ✓ Red Flag Areas
2. Fraud, Waste, and Abuse
 - ✓ Relevant FWA Laws
 - ✓ FWA Waivers
 - ✓ Payment Rule Waivers
3. Privacy
 - ✓ HIPAA & Privacy Laws
 - ✓ Data Use Requirements
 - ✓ Disclosure of PHI/PII

REACH ACO Compliance Training

The comprehensive module includes four sections:

1. ACO REACH Model Overview
 - ✓ REACH ACO 101
 - ✓ Compliance Program Requirements (the 5 elements)
 - ✓ Red Flag Areas
2. Voluntary Alignment
 - ✓ Alignment Overview
 - ✓ Interaction with Beneficiaries
 - ✓ Dos & Don'ts
3. Fraud, Waste, and Abuse
 - ✓ Relevant FWA Laws
 - ✓ Safe Harbors
 - ✓ Benefit Enhancements
4. Privacy
 - ✓ HIPAA & Privacy Laws
 - ✓ Data Use Requirements
 - ✓ Disclosure of PHI/PII

Voluntary Alignment Training

The comprehensive module covers a variety of topics relating to Voluntary Alignment including:

- ✓ Voluntary Alignment Overview
- ✓ MVA vs SVA
- ✓ Role of Providers & Staff
- ✓ Elements of a Valid Form
- ✓ Witness Signature Requirements
- ✓ FAQs
- ✓ Interaction with Beneficiaries
- ✓ Do's & Don'ts

Add-On: Data Custodian Training

- The REACH ACO Participation Agreement and the MSSP Data Use Agreement (DUA) holds an ACO and Data Custodians to data standards **above and beyond** the Health Insurance Portability and Accountability Act (HIPAA).
- CMS has made all ACO-MS Contacts, regardless of role within the ACO, Data Custodians.
- Data Custodians are responsible for knowing and complying with the data requirements.
- WRG created the Data Custodian Training to help ACO-MS Contacts understand the compliance and operational requirements.
- The training module includes:
 - ✓ Data Use Overview
 - ✓ Data Custodian Responsibilities
 - ✓ Data Sharing Requirements

Add-On: REACH Consumer Advocate Training

- REACH ACO Governing Bodies are **required** to include an individual with professional experience or training as a Consumer Advocate. This individual cannot be the same as the Medicare Beneficiary Representative.
- WRG created the Consumer Advocate Training to help ACOs prepare advocates specifically for the model and help guide them in increasing the beneficiary voice in ACO operations.
- Both the Consumer Advocate and Medicare Beneficiary would benefit from this training.
- The training module includes:
 - ✓ ACO REACH Model Background
 - ✓ Basic Model Requirements
 - ✓ The Role of the Consumer Advocate
 - ✓ The Consumer Advocate Voice in the REACH ACO

Compliance Reporting

- The ACO is required to implement a method by which ACO-related individuals can **anonymously** report suspected problems related to the ACO and ACO activities.
- WRG hosts an online Compliance Reporting Tool to ensure ACO-related individuals can submit a report anytime from anywhere and choose to remain anonymous.
- The reports are transmitted to the designated individual(s) within the ACO for investigation and follow-up.
- Reports are re-routed within the ACO if the designated individual is implicated in a report.
- **This product is included at no cost when the ACO purchases WRG General ACO Compliance training.**



CONTACT

Kimberly Busenbark, CEO
kwilems@wilemsrg.com

Training Related Inquiries:
Rebecca Cooper
rcooper@wilemsrg.com

