

Summary of Arrangement Conducted Under the Medicare ACO Participation Waiver

Qualuable Medical Professionals MSSP ACO

Pursuant to the Final Rule on “Medicare Program; Final Waivers in Connection with the Shared Savings Program,” published in the Federal Register on October 29, 2015 at 80 FR 66726, a Medicare Accountable Care Organization (“ACO”) may seek waiver protection for certain arrangements that, among other things, are reasonably related to the purposes of the Medicare Shared Savings Program. Qualuable Medical Professionals LLC (“Qualuable”) is an ACO that has entered into a participation agreement under the Medicare Shared Savings Program with the Centers for Medicare and Medicaid Services (“CMS”) and is in good standing under that agreement. Pursuant to the Final Rule, Qualuable seeks waiver protection for the arrangement described below.

The parties to the arrangement are Qualuable, OnePartner LLC (“OnePartner”), a health information exchange, and Quest Diagnostics Incorporated (“Quest”). Under the arrangement, OnePartner will enter into an agreement with Qualuable to provide Qualuable and its participating providers with information technology services. OnePartner will also enter into an agreement with Quest Diagnostics Inc. (“Quest”) to provide interface services for the ordering of reference laboratory orders and results between Quest and Qualuable ACO participants. Quest will pay OnePartner for the provision of interface services and Quest’s payments to OnePartner will directly support the provision of the information technology services to Qualuable and its participating providers. Quest will also assist OnePartner and Qualuable in the establishment of a clinical laboratory testing advisory board and the development of recommended guidelines and protocols for clinical laboratory testing.

The Qualuable Board of Directors has duly authorized the arrangement and has made a bona fide determination that the arrangement is reasonably related to the purposes of the Shared Savings Program, which purposes include promoting accountability for the quality, cost, and overall care for a Medicare patient population; managing and coordinating care for Medicare fee-for-service beneficiaries through an ACO; and encouraging investment in infrastructure and redesigned care processes for high quality and efficient service delivery to patients, including Medicare beneficiaries. The arrangement will promote development of information technology infrastructure and cost-effective technological solutions to aid in the coordination of care for Qualuable beneficiaries. Collaboration between Qualuable, OnePartner, and Quest will promote accountability for the cost and quality of care provided to Qualuable beneficiaries and support high quality efficient service delivery to Qualuable beneficiaries.

This arrangement was approved by the Qualuable Board of Directors on February 10, 2017, by Written Consent and is effective as of March 1, 2017.