Medicare Shared Savings Program ACO Formation Consulting

Last reviewed October 2026 · https://www.integralhs.com/aco-shared-savings-program-readiness

What to have ready

Items below that cite a section reflect that section's text (eCFR, current as of September 30, 2026 when read) or CMS's published timeline; items without a citation are IHS's working list, and the CMS application materials for your cycle govern.

1. An estimate showing the ACO can reach at least 5,000 assigned beneficiaries (42 CFR 425.110(a)(1), eCFR [https://www.ecfr.gov/current/title-42/section-425.110]).
2. A list of the ACO's participants, which your cycle's CMS application materials will ask you to identify.
3. A description of how the ACO will be accountable for quality, cost and overall care of assigned beneficiaries (42 CFR 425.100(a), eCFR [https://www.ecfr.gov/current/title-42/section-425.100]).
4. Formation documents identifying the governing body and its authority over ACO functions (42 CFR 425.106(a)(1), eCFR [https://www.ecfr.gov/current/title-42/section-425.106]).
5. A compliance plan naming a compliance official who is not legal counsel to the ACO and reports directly to the governing body (42 CFR 425.300(a), eCFR [https://www.ecfr.gov/current/title-42/section-425.300]).
6. The participant agreements your organization already holds, reviewed by your counsel before the application is assembled.
7. A plan for a five-year participation agreement starting January 1 (42 CFR 425.200(b)(5), eCFR [https://www.ecfr.gov/current/title-42/section-425.200]).
8. A calendar built from CMS's timeline for your start year, with internal deadlines ahead of each submission window (CMS timeline [https://www.cms.gov/medicare/payment/fee-for-service-providers/shared-savings-program-ssp-acos/application-types-timeline]).