

# Key Takeaways



## Best Practices and Lessons Learned

- **Know the flexibilities afforded by the value-based exceptions and safe harbors**
  - Become a “consultant” to help your business team solve difficult problems
  - Educate your client. May need to be more proactive than reactive in this space.
- **Crawl...walk...run**
  - You don’t have to jump to a full-risk model
  - Learn how to succeed with the no-risk and some-risk models
- **Don’t dismiss the value-based Stark exceptions because you are not in risk-based payor contracts**
  - Allow immense flexibility in aligning physicians
  - AKS Employees safe harbor or “intent analysis”
  - Many comp arrangements already meet 10% threshold for “meaningful risk”
- **Flexibilities don’t equal “anything goes!”**
  - Must ensure you meet all requirements of applicable exception/safe harbor (and may need to be comfortable with some AKS exposure)
  - Not every initiative in value-based arrangement is a “value-based purpose”