

Public Website Disclosure Statement

The Centers for Medicare and Medicaid Services (“**CMS**”) and the U.S. Department of Health and Human Services’ Office of Inspector General (“**OIG**”) have made available waivers of certain federal fraud and abuse laws in connection with the operation of accountable care organizations (“**ACOs**”) that have entered into a participation agreement under the Medicare Shared Savings Program (“**MSSP**”).

In order to receive the benefit of such waivers, the governing body of GGC ValueCare, LLC (the “**Company**”) has made a bona fide, detailed determination that the following arrangement is reasonably related to the purposes of the MSSP.

The Company has authorized a waiver of certain federal fraud and abuse laws for an arrangement related to Graves Gilbert Clinic’s “group practice” compensation methodology, including without limitation, the allocation of DHS profits to physicians within the Graves Gilbert Clinic (the “**Arrangement**”).

The governing body of the Company authorized the application of the waiver to the Arrangement on May 6, 2025, following a determination that the Arrangement supports the goals of the Company and is reasonably related to the purposes of the MSSP, in each case because the Arrangement: (i) assists in the coordination of care across Graves Gilbert Clinic’s various service offerings for its patients, including for Medicare beneficiaries attributed to the Company, which allows for the delivery of higher quality healthcare services; (ii) assists in reducing the costs of health care for patients, including for Medicare beneficiaries attributed to the Company, by instituting relevant quality, efficiency, and utilization metrics for physicians; (iii) enhances physician engagement for driving true performance and clinical integration among physicians in the community; and (iv) incentivizes training, development of appropriate internal compliance measures, and appropriate allocation of resources in a value-based setting.