

Comprehensive Primary Care Plus (CPC+)

Practice Frequently Asked Questions

August 1, 2016

GENERAL

Q: Why is CMS testing CPC+?

CMS believes that through multi-payer payment reform and practice transformation, primary care practices will be able to build capabilities and care processes to deliver better care, which will result in a healthier patient population. Payment redesign by payers, both public and private, will offer the ability for greater cash flow and flexibility for primary care practices to deliver high quality, whole-person, patient-centered care and lower the use of unnecessary services that drive total costs of care.

In its first year, CPC achieved gross savings and was nearly cost neutral, with positive quality results. These findings came earlier than expected in a model involving significant changes in the delivery of primary care. CPC+ looks to build on these results by offering two tracks with different payment options to better accommodate the diverse needs of primary care practices.

Q: When will CPC+ start and how long will it last? Can I join later?

The first performance period for CPC+ begins on January 1, 2017.

CPC+ consists of five performance years, per the table below. CMS expects practices to participate for the full five years of the model and, at this time, does not plan to accommodate new practices after 2017.

PERFORMANCE YEARS FOR CPC+

| Performance year | Calendar year |
|------------------|---------------|
| 1 | 2017 |
| 2 | 2018 |
| 3 | 2019 |
| 4 | 2020 |
| 5 | 2021 |

Q: Are practices required to participate in CPC+ for the full five years?

CMS expects practices that participate in CPC+ will do so for the full five years of the model. However, participation in CPC+ is voluntary and practices may withdraw from the model without penalty during the five-year program period. Practices are required to notify CMS at least 90 calendar days before the planned day of withdrawal. Departing the program before completion of a performance year (PY) puts a practice at risk for recoupment of the prospectively paid performance based incentive payment.

Q: Where will CPC+ be implemented?

CPC+ will be implemented in 14 regions throughout the U.S:

1. Arkansas: Statewide
2. Colorado: Statewide
3. Hawaii: Statewide
4. Kansas and Missouri: Greater Kansas City Region
5. Michigan: Statewide
6. Montana: Statewide
7. New Jersey: Statewide

8. New York: North Hudson-Capital Region
9. Ohio: Statewide and Northern Kentucky: Ohio and Northern Kentucky Region
10. Oklahoma: Statewide
11. Oregon: Statewide
12. Pennsylvania: Greater Philadelphia Region
13. Rhode Island: Statewide
14. Tennessee: Statewide

The CPC+ regions were selected based on payer alignment and market density to ensure that CPC+ practices have sufficient payer support to make fundamental changes in their primary care delivery.

Q: How is CMS defining the “Greater Kansas City (KS & MO)”, “North Hudson-Capital Region (NY)”, “Ohio and Northern Kentucky”, and “Greater Philadelphia (PA)” regions?

Based on payer alignment and market density, CMS is defining the regions located in partial states with the following counties:

- Kansas and Missouri: Greater Kansas City Region: Johnson County, KS; Wyandotte County, KS; Clay County, MO; Jackson County, MO; Platte County, MO
- New York: North Hudson-Capital Region: Albany County, NY; Columbia County, NY; Dutchess County, NY; Greene County, NY; Montgomery County, NY; Orange County, NY; Rensselaer County, NY; Saratoga County, NY; Schenectady County, NY; Schoharie County, NY; Sullivan County, NY; Ulster County, NY; Warren County, NY; Washington County, NY
- Ohio: Statewide and Northern Kentucky: Ohio and Northern Kentucky Region: All counties in Ohio; Boone County, KY; Campbell County, KY; Grant County, KY; Kenton County, KY
- Pennsylvania: Greater Philadelphia Region: Bucks County, PA; Chester County, PA; Delaware County, PA; Montgomery County, PA; Philadelphia County, PA.

Only practices located in these counties will be eligible to apply and participate to CPC+.

Q: Are practices outside of the CPC+ regions eligible to apply and participate in CPC+?

Practices will only be eligible to apply to CPC+ if they are located in one of the 14 selected CPC+ regions (see list above). The purpose of the CPC+ multi-payer design is to ensure that primary care practices receive the adequate support from multiple insurers to change care delivery for a practice’s entire panel of patients. The CPC+ regions were carefully selected to ensure adequate payer support for participating practices.

Q: Which payers have been provisionally selected to partner in CPC+?

1. Arkansas: Arkansas BlueCross BlueShield, Arkansas Health & Wellness Solutions, Arkansas Medicaid, Arkansas Superior Select, HealthSCOPE Benefits, QualChoice Health Plan Services, Inc.
2. Colorado: Anthem, Colorado Choice Health Plans, Colorado Medicaid, Rocky Mountain Health Plans, UnitedHealthcare
3. Hawaii: Hawaii Medical Service Association
4. Kansas and Missouri: Greater Kansas City: BlueCross BlueShield of Kansas City
5. Michigan: BlueCross BlueShield of Michigan, Priority Health
6. Montana: BlueCross BlueShield of Montana, Montana Medicaid, PacificSource Health Plans
7. New Jersey: Amerigroup New Jersey, Inc., Delaware Valley ACO, Horizon BlueCross BlueShield of New Jersey, UnitedHealthcare
8. New York: Hudson Valley Region: Capital District Physicians’ Health Plan, Empire BlueCross BlueShield, MVP Health Plan, Inc.

9. Ohio and Northern Kentucky: Aetna, Anthem, Aultman Health Foundation, Buckeye Health Plan, CareSource, Gateway Health Plan of Ohio, Inc., Medical Mutual of Ohio, Molina Healthcare of Ohio, Inc., Ohio Medicaid, Paramount Health Care, SummaCare, Inc., The Health Plan, UnitedHealthcare
10. Oklahoma: Advantage Medicare Plan, BlueCross BlueShield of Oklahoma, CommunityCare HMO, Inc., Oklahoma Medicaid, UnitedHealthcare
11. Oregon: AllCare Health, Inc., ATRIO Health Plans, Inc., CareOregon, Eastern Oregon Coordinated Care Organization, FamilyCare Health, Moda Health Plan, Inc., Oregon Medicaid, PacificSource Health, PrimaryHealth of Josephine County, Providence Health Plan, Tuality Health Alliance, Western Oregon Advanced Health, Willamette Valley Community Health Organization, Yamhill Community Care Organization, Inc.
12. Pennsylvania: Greater Philadelphia: Aetna, Independence BlueCross/Keystone Health Plan East, Delaware Valley ACO
13. Rhode Island: BlueCross BlueShield of Rhode Island, Rhode Island Medicaid, Tufts Health Plan, UnitedHealthcare
14. Tennessee: Amerigroup Tennessee, Tennessee Medicaid, United Healthcare, Volunteer State Health Plan

Q: Can practices move from Track 1 to Track 2 throughout the course of the five-year model?

No, practices will remain in their respective tracks and may not change tracks throughout the course of the five-year model. Practices are invited to apply directly to the track for which they are interested and believe they are eligible; however, CMS reserves the right to ask a practice that applied to Track 2 to instead participate in Track 1 if CMS believes that the practice does not meet the eligibility requirements for Track 2 but does meet the requirements for Track 1.

Q: Did the Quality Payment Program notice of proposed rule making reference CPC+?

CMS announced a [proposed rule](#) to implement key provisions of Medicare Access and CHIP Reauthorization Act (MACRA) on April 27, 2016. The final rule is anticipated in Fall 2016.

The proposed rule includes a list of models that would qualify under the terms of the proposed rule as Advanced Alternative Payment Models (APMs). CPC+ is included on the proposed list as an Advanced APM and would be subject to medical home model-specific requirements. For 2019 through 2024, clinicians who meet the statutory threshold for sufficient participation in Advanced APMs would be excluded from the Merit-based Incentive Payment System (MIPS) reporting requirements and payment adjustments and would qualify for a five percent APM incentive payment.

Medical Home Model- Specific Requirements (from page 11-12 of the Quality Payment Program proposed rule fact sheet, which can be found here: <https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/Value-Based-Programs/MACRA-MIPS-and-APMs/NPRM-OPP-Fact-Sheet.pdf>)

“Under the statute, medical home models that have been expanded under the Innovation Center authority qualify as Advanced APMs regardless of whether they meet the financial risk criteria. While medical home models have not yet been expanded, the proposed rule lays out criteria for medical home models to ensure that primary care physicians have opportunities to participate in Advanced APMs.”

The rule proposes a definition of medical home models, which focus on primary care and accountability for empaneled patients across the continuum of care. Because medical homes tend to have both less experience with financial risk than larger organizations and limited capability to sustain substantial losses, we propose unique Advanced APM financial risk standards, consistent with the statute, to accommodate medical homes that are part of organizations with 50 or fewer clinicians.”

Additional information is available on the [CMS Quality Payment Program website](#).

Q. What role do other payers play in CPC+?

Multi-payer engagement is an essential goal of CPC+, as it enables both public and private payers to sponsor comprehensive primary care reform. CMS will partner with payers that share Medicare’s interest in strengthening primary care in each of the 14 regions.

Payer partners, both public and private, will provide their own financial support to practices, separate from that of Medicare Fee-for-Services (FFS). Any questions regarding non-Medicare payer support should be directed to the partnering payer.

COMPREHENSIVE PRIMARY CARE INITIATIVE AND CPC+

Q: What are the major differences between CPC and CPC+?

CPC+ builds upon the lessons learned from the CPC initiative, CMS’ largest investment in primary care to date. Notable changes include:

| | CPC | CPC+ Track 1 | CPC+ Track 2 |
|---|---|--|---|
| Size | 7 Regions; ≈ 500 practices | 14 Regions; ≤2500 practices | 14 Regions; ≤2500 practices |
| Duration | 4 y (2012-2016) | 5 y (2017-2021) | 5 y (2017-2021) |
| Medicare care management fee^a | \$20 PBPM PY1-2; \$15 PBPM PY3-4; average across 4 risk tiers | \$15 PBPM average across 4 risk tiers | \$28 PBPM average across 5 risk tiers; \$100 for highest-risk tier |
| Medicare payment for office visits | 100% FFS | 100% FFS | 100% FFS for non-evaluation and management; reduced FFS + up-front comprehensive primary care payment for evaluation and management |
| Medicare incentive payment | Shared savings based on quality metrics and Total costs of care (TCOC) ^b | \$2.50 PBPM performance-based incentive payment based on quality and utilization metrics | \$4 PBPM performance-based incentive payment based on quality and utilization metrics |
| HIT partners | Not required | Not required | Required |

^aPaid only for Medicare FFS beneficiaries attributed to participating practices.

^bSavings calculated based on any reduction in Medicare Part A and B expenditures.

Citation: Sessums LLS, McHugh, SJ, Rajkumar R. Medicare’s vision for advanced primary care: New directions for care delivery and payment. *JAMA*. 2016;315(24):2665-2666.

Q: How does CPC+ impact the prospects of expanding the original CPC initiative?

Though CPC ends in December 2016, CMS will continue to consider all available data from CPC as it becomes available, including shared savings results, quality performance, and the results of the

independent evaluation, to determine whether and/or when to scale the model in accordance with the statutory requirements for expansion under section 1115A of the Social Security Act.

Q: What were practice experiences with the original CPC initiative?

Since 2012, the original CPC initiative has built collaborative relationships between payers, primary care clinicians, and other regional stakeholders in each of its seven regions. These relationships took time to build. Nonetheless, practice and payer involvement has remained remarkably stable into the fourth year of CPC. Nearly 90 percent of practices remain in the model at the start of the fourth year, and only a few small payers are no longer involved in CPC or merged with other participating payers since 2012. Many payers remain engaged in supporting CPC and some have increased their focus on supporting primary care since CPC began.

Additional information regarding practice and payer experience in CPC can be found in the independent evaluation reports conducted by Mathematica Policy Research:

- o [First Annual Report](#)
- o [Second Annual Report](#)

PAYMENT DESIGN

Q: How will primary care practices be paid in CPC+?

CPC+ practices will receive a risk-adjusted, prospective, monthly care management fee (CMF) for their attributed Medicare fee-for-service patients. Practices will use this enhanced, non-visit-based compensation to augment staffing and training in support of population health management and care coordination. Track 1 practices will receive a CMF that averages \$15 per beneficiary per month (PBPM) to support their transformation efforts. Track 2 practices will receive an average of approximately \$28 PBPM, including a \$100 PBPM for a highest risk tier to support the enhanced services beneficiaries with complex needs require.

CPC+ Care Management Fees

| Risk Tier | Attribution Criteria | Track 1 | Track 2 |
|------------------------|---|----------------|----------------|
| Tier 1 | 1 st quartile HCC | \$6 | \$9 |
| Tier 2 | 2 nd quartile HCC | \$8 | \$11 |
| Tier 3 | 3 rd quartile HCC | \$16 | \$19 |
| Tier 4 | 4 th quartile HCC for Track 1; 75-89% HCC for Track 2 | \$30 | \$33 |
| Complex (Track 2 only) | Top 10% HCC OR Dementia | N/A | \$100 |
| Average PBPM | | \$15 | \$28 |

In Track 1, practices will also continue to receive regular Medicare fee-for-service payments for covered evaluation and management services. In Track 2 of CPC+, CMS is introducing a hybrid of fee-for-service and Comprehensive Primary Care Payment (CPCP). This hybrid payment will pay for covered evaluation and management (E&M) services, but allows flexibility for the care to be delivered both in and out of an office visit. Track 2 practices will receive a percentage of their expected Medicare E&M payment upfront in the form of a CPCP and a reduced fee-for-service payment for face-to-face E&M claims. In an effort to recognize practice diversity in readiness for this change in payment, CMS will allow practices to move to one of these final two proposed hybrid payment options (40 percent or 65 percent CPCP with 60 percent or 35 percent FFS), at their preferred pace by 2021, pursuant to the options shown in this table:

CPCP and FFS Options

| | 2017 | 2018 | 2019 | 2020 | 2021 |
|--|---------|---------|---------|---------|---------|
| CPCP%/FFS% options available to practices, by year | 10%/90% | | | | |
| | 25%/75% | 25%/75% | | | |
| | 40%/60% | 40%/60% | 40%/60% | 40%/60% | 40%/60% |
| | 65%/35% | 65%/35% | 65%/35% | 65%/35% | 65%/35% |

Q: How will primary care practices be encouraged and rewarded for their accountability for patient experience, clinical quality, and utilization?

CMS will prospectively pay a performance-based incentive payment, which practices may keep if they meet annual performance thresholds. Practices that do not meet the annual thresholds would be required to repay all or a portion of the prepaid amount. Practices will thus be “at risk” for the amounts prepaid. The payment will be broken into two distinct components, both paid prospectively: incentives for performance on clinical quality/patient experience measures and incentives for performance on utilization measures that drive total cost of care. The quality/experience component will be based on performance on electronic clinical quality measures (eCQM) and Consumer Assessment of Healthcare Providers and Systems (CAHPS) metrics. The utilization component will be based on claims-based measures that are commonly used to measure total cost of care and measurable at the practice level, such as: inpatient admissions and emergency department visits that are available in the Healthcare Effectiveness Data and Information Set (HEDIS).

CMS will provide larger performance-based incentive payments in Track 2 than in Track 1, as outlined in the following table. However, all practices are at risk for repaying all or a portion of the prepaid amount to CMS depending on their performance. The final methodology for calculating the prepaid amounts and repayment amounts will be outlined in a methodology paper, so practices understand the payment mechanism prior to the start of the model.

CPC+ Performance Based Incentive Payment

| | Utilization (PBPM) | Quality (PBPM) | Total (PBPM) |
|---------|--------------------|----------------|--------------|
| Track 1 | \$1.25 | \$1.25 | \$2.50 |
| Track 2 | \$2.00 | \$2.00 | \$4.00 |

Q: What are the differences between the three payment elements?

- 1) **Care Management Fee (CMF):** Both tracks provide a non-visit based CMF paid PBPM. The amount is risk-adjusted for each practice to account for the intensity of care management services required for the practice’s specific population. The Medicare FFS CMFs will be paid to the practice on a quarterly basis.
- 2) **Performance-based incentive payment:** CPC+ will prospectively pay and retrospectively reconcile a performance-based incentive payment based on how well the practice performs on patient experience measures, clinical quality measures, and utilization measures that drive total cost of care.
- 3) **Payment under the Medicare Physician Fee Schedule:**
 - a. Track 1 continues to bill and receive payment from Medicare FFS as usual.
 - b. Track 2 practices also continue to bill as usual, but the FFS payment for evaluation and management services will be reduced to account for CMS shifting a portion of Medicare FFS payments into **Comprehensive Primary Care Payments (CPCP)**, which will be paid in a lump sum on a quarterly basis without a claim. Given our expectations that Track 2 practices will increase the comprehensiveness of care delivered, the CPCP amounts will be larger than the FFS payment amounts they are intended to replace.

CPC+ Financial Summary Table

| Track | Care Management Fees, PBPM | Performance-Based Incentive Payments | Payment under Medicare Physician Fee Schedule |
|-------|---------------------------------|---|---|
| 1 | \$15 average | Utilization and Quality/Experience Components | FFS |
| 2 | \$28 average; \$100 for complex | Utilization and Quality/Experience Components | ↓FFS + ↑CPCP |

Q: Will practices be responsible for reporting their Medicare spending to CMS?

Yes, CPC+ practices will be required to both forecast their spending of the care management fee and CPCP and, at the end of the performance year, provide an account of actual CMF and CPCP revenue received and actual expenditures. This reporting will help practices understand and optimize their use of these alternative payments and will also help CMS to understand how practices use the revenue they receive from Medicare to perform the care delivery work the model requires.

Q: How will Medicare beneficiaries be attributed to practices?

Beneficiaries will be attributed to the practice that either billed for the plurality of their primary care allowed charges, or that billed the most recent claim (if that claim was for Chronic Care Management (CCM) services) during the most recently available 24-month period. If a beneficiary has an equal number of qualifying visits to more than one practice, the beneficiary will be attributed to the practice with the most recent visit. CMS will provide each practice with a list of its prospectively attributed beneficiaries for each quarter. More details of the Medicare attribution methodology are available in Appendix E of the [CPC+ Request for Applications](#).

Q: How are Medicare FFS beneficiaries assigned to the various risk tiers?

CMS assigns beneficiaries to a risk tier based on the individual’s hierarchical condition category (HCC) score. CMS-HCC scores are generated for all Medicare beneficiaries, and are updated annually based on the beneficiaries’ claims history. CMS will use the most recent HCC scores available in the CMS claims databases at the time of attribution. A beneficiary’s HCC score will determine to which risk quartile the

beneficiary will be assigned (see [CPC+ Care Management Fees table](#)), based on comparison to the population of Medicare FFS beneficiaries in that region. In Track 2, the complex tier will be based on a combination of HCC score and beneficiaries who have a diagnosis of dementia.

Q: What kind of patients will be included in the “complex tier” of top 10 percent HCC for the CPC+ care management fee?

The top 10 percent of the HCC risk pool will represent patients who are the “sickest of the sick,” with multiple conditions and high expected costs. The exact range of HCC scores and number of beneficiaries assigned to the complex tier will vary based on region, due to different populations and variations in coding practices. For a more detailed description of the HCC methodology, as well as detailed information on what diagnoses are included in the HCC scores, please refer to this [independent evaluation report](#).

In addition to beneficiaries in the top 10 percent HCC, beneficiaries who have a diagnosis of dementia will also be assigned to the complex tier. Dementia diagnosis is assigned based on a chronic condition flag generated annually based on a set of diagnoses codes present in the prior three years. For detailed information, please refer to the [Chronic Conditions Warehouse](#).

CARE DELIVERY DESIGN

Q: What are the main design features of the CPC+ care delivery model?

In CPC+, practices will be guided by Comprehensive Primary Care Functions: (1) Access and Continuity; (2) Care Management; (3) Comprehensiveness and Coordination; (4) Patient and Caregiver Engagement; and (5) Planned Care and Population Health. In Track 2, the practices will heighten their focus on caring for patients with complex medical, behavioral, and psychosocial needs. Thus, Track 2 practices will increase the breadth and depth of services offered, as well as inventory resources and supports necessary to meet their psychosocial needs, as appropriate. Because comprehensive primary care requires advanced health information technology (health IT) support for its population-health focus and team-based structure, CMS will require Track 2 practices to engage directly with vendors about model goals and requirements.

Q: What does it mean that practices will enhance the comprehensiveness of care in the primary care setting?

Comprehensiveness in the primary care setting refers to the practice meeting the majority of its patient population’s medical, behavioral, and psychosocial needs. Strategies to achieve comprehensiveness involve the use of analytics to identify needs at a population level and developing processes to meet those needs. This includes building capability within the practice, as well as building strong and coordinated referral networks within the medical neighborhood and with community-based services.

Comprehensiveness adds both breadth and depth to the delivery of primary care services; builds on the patient-practitioner relationship that is at the heart of effective primary care; and is associated with less fragmented care, better health outcomes, and lower overall costs.

Q: What changes will practices be expected to make in their care delivery in the first performance year (PY 2017)?

The CPC+ care delivery requirements are intended to provide a framework for practices to deepen their capabilities throughout the five-year model. These incremental requirements will guide practices through the five comprehensive primary care functions and will serve as markers for regular, measureable progress to the CPC+ model aims. Track 2 care delivery requirements are inclusive of and build upon the Track 1 requirements, as the framework for delivering better care, smarter spending, and healthier people in CPC+ is the same across both tracks. Track 2 includes additional requirements that will assist practices

to increase the depth, breadth, and scope of care offered, with particular focus on their patients with complex needs.

For a detailed description, please refer to the [2017 CPC+ practice care delivery requirements](#).

Q: What learning and technical assistance supports will CPC+ offer to participating practices?

CPC+ will offer participating practices a variety of learning opportunities to support their transformation needs with in-person, virtual, and on-demand events and information. National and regional learning communities will provide CPC+ practices with opportunities for in-person and web-based learning. Learning events and materials will orient practices to CPC+ program requirements and guide practices through the CPC+ corridors of work. Online collaboration tools and web-based portals will facilitate practice sharing. Regional learning communities will also offer targeted, practice-level technical assistance to support practices to enhance their capabilities.

QUALITY MEASUREMENT

Q: How will CPC+ measure the improvement in the quality of care for and experience of care by patients?

This model aims to improve the quality and experience of care that beneficiaries receive and decrease the total cost of care. To assess quality performance and eligibility for the CPC+ performance-based incentive payment, CMS will require Track 1 and 2 practices to annually report electronic clinical quality measures (eCQMs) and patient experience of care measures (Consumer Assessment of Healthcare Providers & Systems [CAHPS]). eCQMs must be reported at the practice-site level and are specified to include all practice population patients, regardless of payer or insurance status. CAHPS surveys will be administered by CMS or its contractors to patients in practices in Track 1 and Track 2. In future years, Track 2 practices may also use a patient reported outcome measure survey.

The provisional Quality and Utilization Measure Set for CPC+ is available in Appendix D of the [Request for Applications](#). The quality reporting requirements may undergo changes prior to the start of CPC+, after the final list of the MIPS measures are published in the Quality Payment Program final rule.

Q: How does a multi-specialty practice complete practice-site quality reporting?

CPC+ practitioners may share physical space and an electronic health record (EHR) with other practitioners who do not participate in CPC+. By 2018, all CPC+ practice sites must have functionality to filter electronic clinical quality measure (eCQM) data by the practice site location as well as Taxpayer Identification Number/National Provider Identifier (TIN/NPI). This filtering functionality (C4 certification) will allow practices to include in the measure calculation only patients seen by CPC+ practitioners. The CPC+ practice site level reporting requirement means that any patient who is seen at least one time at the practice during the calendar year by a CPC+ practitioner is eligible to be included in the denominator of a measure. If a patient was only seen by a non-CPC+ practitioner at the practice, the patient will not be included in the denominator of the measure.

HEALTH IT REQUIREMENTS

Q: What are the technology requirements for Track 1 and 2 practices?

Practices in both Tracks 1 and 2 are required to adopt the following health IT to participate in CPC+:

- Practices should adopt the certified health IT modules that meet the definition of CEHRT according to the timeline and requirements finalized for use in CMS programs supporting

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certified EHR use (e.g., EHR Incentive Programs. Consistent with these programs, practices can use either 2015 Edition or 2014 Edition technology in 2017, but must use only 2015 Edition technology starting in 2018.

Practices in both Tracks 1 and 2 also need to meet certain technology requirements in order to report on required electronic clinical quality measures (eCQMs) under the program:

- Practices will need to adopt health IT certified to the (c)(1) – (c)(3) certification criteria for all of the electronic clinical quality measures in the CPC+ measure set. As with the overall [CEHRT requirements](#), practices should follow the requirements and timeline of the EHR Incentive Program (i.e., practices can use either 2015 Edition or 2014 Edition technology in 2017, but must use only 2015 Edition technology starting in 2018).
- For the CPC+ measures, practices must use the latest annual measure update. For instance, for the 2017 performance period, practices must use the eCQM specifications contained in the 2016 annual update, released in April 2016 (https://www.cms.gov/regulations-and-guidance/legislation/ehrincentiveprograms/ecqm_library.html).
- Finally, practices must be able to filter their electronic clinical quality measure data by practice site location and TIN/NPI beginning in 2017. Beginning in 2018, practices will demonstrate their ability to conduct this filtering by adopting 2105 Edition health IT certified to the criterion found at 45 CFR 170.315(c)(4).

To support specific Track 2 enhanced health IT functions, Track 2 practices will also be expected to meet two additional certified technology requirements:

- Adopt health IT certified to the 2015 Edition “Care Plan” criterion found at 45 CFR 170.315(b)(9) by January 1, 2019 (the beginning of performance year (PY) 3 of CPC+).
- Adopt health IT certified to the 2015 Edition “Social, Behavioral, and Psychosocial Data” criterion found at 45 CFR 170.315(a)(15) by January 1, 2019 (the beginning of performance year 3 of CPC+).

Q: Can practices apply for Track 2 even if their vendor is not included on the [CPC+ Vendor List](#)?

Yes, the Vendor List is purely voluntary and provided for informational purposes. Practices may indicate support from a vendor regardless of whether they are on the informational list.

Vendors may submit information about their health IT product and contact information to be included in the CPC+ Vendor List. Vendors should email CPCPlus@CMS.HHS.gov with a brief paragraph about their health IT product, the [CPC+ Track 2 advanced health IT functions](#) they support, and their contact information for interested practices.

Vendors with products that support one or more of the advanced health IT functions for Track 2 may also submit a [global vendor letter of support](#) to CPCPlus@CMS.HHS.gov. CMS is providing the letters of support for the convenience of the CPC+ practices. The letter of support is designed to let CMS know that an applicant practice has a plan for meeting the requirements of the model. Please note that the vendor’s business relationship with a practice is solely between the vendor and that practice; it does not include CMS.

CMS does not endorse any health IT vendors or products, and recommends that practices verify product applicability to the advanced health IT requirements in Track 2.

Q: Can practices whose primary EHR vendor will not be supporting CPC+ functionality use another health IT vendor to meet the advanced health IT requirements for CPC+?

Yes. Practices need to meet the health IT requirements listed in the [Request for Applications](#) in order to participate in CPC+. The first requirement states, “Adopt at a minimum, the certified health IT need to meet the certified EHR technology (CEHRT) definition required by the Medicare EHR Incentive Program

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at 42 CFR 495.4.” This means that practices may use either a 2014 or 2015 Edition CEHRT in 2017 but must have adopted a 2015 CEHRT by January 2018.

The other requirements(e.g., electronic clinical quality measure [eCQM] reporting) do not need to be fulfilled solely in the practice’s primary EHR, except for the [c1 requirement of “Record and Export”](#). The c1 requirement means that the practice is documenting (recording) the clinical data in their practice EHR. Another application or service, such as a third-party registry, can be used to fulfill the c2, c3, and c4 requirements as long as it is certified for those functions. The practice is responsible for ensuring that the registry is certified for the c2, c3, and c4 functions and for ensuring that the registry can report the specific eCQMs required in CPC+.

Q: What is the effect on quality reporting of a practice’s change of EHR while participating in CPC+?

A practice’s change of EHRs after the start of any performance year in CPC+ may affect the practice’s ability to receive a performance-based incentive payment that is based on the reporting of electronic clinical quality measures. After the launch of the model, CMS will provide additional guidance about how practices should approach changing systems to minimize effects on reporting and payment.

Q: May a practice in Track 2 switch to a different vendor to support an enhanced health IT function while participating in CPC+?

Yes, if a vendor withdraws support for the practice for a specific health IT function after the model begins, or if the practice decides to work with a different vendor, the practice may find a new vendor to support that specific health IT function. The new vendor identified by the practice will also need to commit to supporting the practice for one or more of the specific HIT functions listed in Appendix C of the [CPC+ Request for Applications](#) and will be asked to sign a Memorandum of Understanding (MOU) with CMS. Practices must have vendor support for all health IT functions listed to remain in the model.

Q: Can practices use a third party, such as a registry, health information exchange (HIE), or other service to submit electronic clinical quality measures required under the model?

Yes, as long as the third party meets the health IT requirements described above.

Q: Can a practice work with more than one health IT vendor to meet the requirements of the model?

Yes, practices in both tracks may partner with the vendor or vendors they believe will best help them to meet the requirements of the model.

Q: Is the practice required to use certified technology for the Track 2 functions where there are no corresponding certification criteria in the 2015 Edition?

No, the Track 2 functions are designed to include capabilities beyond those included in the Office of the National Coordinator (ONC) certification program.

Q: Can practices use other health IT solutions beyond the requisite EHR to carry out the Track 2 health IT functions?

Yes. All practices are required to meet the basic technology requirements; to carry out the Track 2 health IT functions, practices may use their EHR and/or other health IT solutions.

Q: Does a Track 2 practice need to purchase software or have an agreement in place with a vendor in order to identify that vendor as supporting their participation in Track 2 as part of the application?

No, the letter of support only indicates that a vendor is willing to partner with the practice to support a given function and communicates to CMS that the practice has a strategy in place to address the Track 2 health IT requirements.

Q: Does a Track 2 practice need to have all of the Track 2 health IT functions implemented by the start of the model?

No, CMS expects that these functions will be developed over the course of the model, with all functions implemented by the beginning of performance year 3 of the model (2019). CMS will provide more detailed information about timelines for specific functions once CPC+ begins in 2017.

Q: Must practices already work with the health IT vendor whose letter of support is included in the practice application? Are practices committed to working with the health IT vendor whose letter of support is included in the practice application?

No, practices may include vendor letters of support in their application for CPC+ even if they are not currently using the product. Further, practices are not required to adopt or purchase any specific health IT product, or work with any health IT vendor, even if they have included a letter of support from the vendor in their application.

PARTICIPATION IN CPC+ AND OTHER MODELS AND PHYSICIAN FEE SCHEDULE CODES

Q: Are practices eligible to bill the Medicare Chronic Care Management fee (CCM) if they are participating in CPC+?

No, because the CPC+ CMFs are intended to pay for CCM covered services, CPC+ participating practices cannot also bill for the same services using the CCM code under the Physician Fee Schedule. However, CPC+ practices may bill for CCM covered services under the Physician Fee Schedule if those services are provided to a Medicare beneficiary that is not attributed to that practice for purposes of the CPC+ model.

Q: Can practices participate in both CPC+ and other CMS or Innovation Center models?

Rules regarding practice participation in CPC+ and other CMS initiatives, models, or demonstrations are outlined as follows:

- CPC+ practices may participate in Model 2 and Model 3 of the Bundled Payments for Care Improvement Initiative and the Oncology Care Model. While they would not be participants themselves, CPC+ practices may also engage in sharing arrangements with participant hospitals in the Comprehensive Care for Joint Replacement Model and the recently proposed Episode Payment Models.
- Medicare beneficiaries may be attributed to both CPC+ and Million Hearts® Cardiovascular Disease Risk Reduction model practices, as cardiovascular interventions can be part of, and complementary to, practice transformation.
 - Despite the recent change to allow Million Hearts model participants to receive payment from both the Chronic Care Management (CCM) fee and the Million Hearts model for the same beneficiary, CPC+ will not allow a CPC+ practice to bill for CCM covered services for an attributed CPC+ beneficiary. However, practices may still get CPC+ and Million Hearts payment for the same beneficiary.
- Because of differences in payment in these two models, CPC+ practices may participate in the Accountable Health Communities Model.
- Clinical Practices enrolled in and receiving technical assistance through Transforming Clinical Practice Initiative (TCPI) can apply for CPC+, but, if selected into the CPC+ program, the practice and clinicians must exit or “graduate” from TCPI effective December 31, 2016. A clinician or practice cannot participate in CPC+ and receive technical assistance from TCPI at the same time. Practitioners providing the technical assistance or serving as faculty resources as part of a TCPI Practice Transformation Network or Support and Alignment Network awardee may participate in CPC+.

Q: Are practices participating in State Innovation Model (SIM) initiatives allowed to participate in CPC+?

Practices participating in SIM initiatives are invited to participate in CPC+. Eight states receiving SIM Model Test Awards were selected as CPC+ regions, and SIM practices in these states are encouraged to apply to the track for which they believe they are eligible.

Q: Are practices in the Multi-payer Advanced Primary Care Practice (MAPCP) demonstration allowed to participate in CPC+?

MAPCP practices are invited to participate in CPC+. Four states that participated in MAPCP were selected as CPC+ regions, and MAPCP practices in these states are encouraged to apply to the track for which they believe they are eligible.

Q: Are practices participating in Agency for Healthcare Research and Quality (AHRQ's) EvidenceNOW initiative eligible to participate in CPC+?

Yes, practices participating in EvidenceNOW are invited to participate in CPC+.

DUAL PARTICIPATION IN CPC+ AND THE MEDICARE SHARED SAVINGS PROGRAM (MSSP)

Q: Can a primary care practice currently participating, or considering participation, in the Medicare Shared Savings Program also participate in Comprehensive Primary Care Plus (CPC+)?

Yes, primary care practices currently participating, or considering participation in Tracks 1, 2, or 3 of the Shared Savings Program, that meet the eligibility requirements of CPC+, may participate in both initiatives. Practices participating in Shared Savings Program Accountable Care Organizations (ACOs) can participate in either track of CPC+.

Practices within ACOs participating in the ACO Investment Model (AIM), Next Generation ACO Model, or other shared savings programs may not participate in CPC+.

Q: Is CMS limiting the number of primary care practices within ACOs that can participate in CPC+?

Yes, up to 1,500 practices of the 5,000 total CPC+ primary care practices may be in Shared Savings Program ACOs. This allows for sufficient opportunities for practices of differing sizes, structures, and ownership to participate in the model.

Q: How will CMS determine which primary care practices within ACOs can participate in CPC+?

If more than 1,500 eligible practices within Shared Savings Program ACOs apply to participate in CPC+, practices will be selected to participate in CPC+ by a lottery. If there are more than 750 practices within ACOs that are eligible for each track, then CMS will divide the opportunity for eligible ACO practice participation between the two tracks as equally as feasible.

See below for more details about [practice selection](#).

Q: How will payment change for primary care practices within ACOs that participate in CPC+?

CPC+ payment flows consist of three elements. Changes in these elements to accommodate ACO practices in CPC+ are explained below:

- 1) *Care management fee (CMF)*: Primary care practices within Shared Savings Program ACOs will receive the same CMFs as all other CPC+ practices. These payments will be made directly to practices to invest in care delivery at the participating CPC+ practice site. Like larger group practices or health systems, any CPC+ practices within an ACO will be required to provide a

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signed letter by ACO leadership that commits to segregate funds paid as a result of participation in CPC+. The CMF will be included in the ACO's total expenditures for shared savings and shared loss calculations.

- 2) *Performance-based incentive payment:* Primary care practices within Shared Savings Program ACOs will forego the CPC+ prospectively paid, retrospectively reconciled performance-based incentive payment, and instead will participate in the ACO's shared savings and shared loss arrangement. If a CPC+ practice leaves an ACO mid-year, the practice is not eligible to receive a pro-rated or any performance-based incentive payment for the remainder of that performance year. The determination of eligibility for the CPC+ incentive payment is made at the beginning of the performance year and is not subject to change.
- 3) *Payment under the Medicare Physician Fee Schedule:* Practices in Track 2 of CPC+ will shift a portion of Medicare fee-for-service (FFS) payments for evaluation and management (E&M) services into Comprehensive Primary Care Payments (CPCPs) and have a reduction in payment for E&M services. The CPCP and reduced FFS payments together will be calculated based on an amount 10 percent larger than historical billings to support increased comprehensiveness of care. The CPCP, including the 10 percent increase, will be included in the ACO's total expenditures for shared savings and shared loss calculations.

There will be no changes to the Shared Savings Program ACO financial benchmark calculations. CPC+ payments (CMF and CPCP) for ACO-aligned beneficiaries will be included in the ACO's expenditures.

Q: Payments in the ACO Investment Model (AIM) are recouped from Shared Savings Program ACOs. Will CPC+ payments be similarly recouped from Shared Savings Program ACOs?

No. Instead of recouping shared savings, as is done in AIM, CPC+ payments made for ACO-aligned beneficiaries will count towards the ACO's expenditures.

Q: How will the CPC+ care delivery and quality reporting requirements change for primary care practices within Shared Savings Program ACOs?

Primary care practices within ACOs will be required to implement the CPC+ care delivery model. Practices must also adhere to quality reporting requirements for both CPC+ and the Shared Savings Program.

Q: Will practices in CPC+ and a Shared Savings Program ACO be considered eligible Advanced APM Entities participating in an Advanced APM under the proposed Quality Payment Program?

Under the Quality Payment Program proposed rule, CPC+ would be evaluated using the special financial risk and nominal amount standards for medical home models. For practices participating in CPC+ and the Shared Savings Program, determinations about the Advanced APM incentive would be based on their participation in the Shared Savings Program (and other Advanced APMs).

- As proposed, Track 1 of the Shared Savings Program would not be an Advanced APM. As a result, participation by eligible clinicians in a CPC+ practice participating in Track 1 of the Shared Savings Program would not be considered in determining whether the clinician would qualify for the APM incentive payment. Eligible clinicians in practices that do not participate in Advanced APMs or do not meet the participation thresholds to qualify for the APM incentive for a year would be subject to MIPS reporting requirements and payment adjustments.
- Under the proposed rule, Tracks 2 and 3 of the Shared Savings Program would be Advanced APMs. Eligible clinicians in CPC+ practices that are part of a Track 2 or 3 Shared Savings Program ACO would be evaluated at the ACO level to determine whether they are eligible for the APM incentive payment and exemption from MIPS.

Q: If a CPC+ practice participating in an ACO leaves that ACO during CPC+, on which program will the determinations about the APM incentive payment under the Quality Payment Program be made?

For practices participating in CPC+ and a Shared Savings Program ACO, determinations about the APM incentive payment would be based on their participation in the Shared Savings Program, not CPC+. For practices participating only in CPC+, determinations about the APM incentive payment would be based on their participation in CPC+. In the Quality Payment Program proposed rule, CPC+ is included on the proposed list of Advanced APMs and is subject to medical home model-specific rules. For 2019 through 2024, clinicians who meet the annual statutory thresholds for sufficient participation in Advanced APMs would be exempt from MIPS payment adjustments and would qualify for a five percent APM incentive payment.

Q: How are the CPC+ and Shared Savings Program application and notification timelines aligned?

For the 2017 Shared Savings Program performance year, the last date for Shared Savings Program ACOs to add TINs to their 2017 ACO Participant Lists is September 6, 2016. The last day to drop TINs for the January 2017 start is October 26. ACOs will certify their 2017 ACO Participants Lists and sign Participation Agreements in December of 2016. ACOs that include CPC+ practices must include the CPC+ practitioners in their Participant List.

Practices will apply to CPC+ between August 1 and September 15, 2016. The last opportunity to choose a TIN and include an NPI for the first performance year and January 2017 start of the model will be in the practice's application. Practices will sign Participation Agreements in the fall. Practices will need to notify CPC+ of any NPI changes after January 2017.

PRACTICE APPLICATION

Q: How can practices apply to participate in CPC+?

CMS will solicit applications from practices within the 14 regions beginning **August 1, 2016** with applications due by **September 15, 2016 at 11:59pm ET**. Practices will apply directly to the track for which they are interested and believe they are eligible; however, CMS reserves the right to ask a practice that applied to Track 2 to instead participate in Track 1 if CMS believes that the practice does not meet the eligibility requirements for Track 2 but does meet the requirements for Track 1.

Interested practices will submit applications for CPC+ via an [online application portal](#).

Q: What is the definition of a “practice site”?

In CPC+, CMS defines a primary care “practice site” as the single “bricks and mortar” physical location where patients are seen, unless the practice has a satellite office or provides patient care in the home instead of at a practice site. A satellite office is a separate physical location that is a “duplicate” of the application practice; the satellite shares resources and certified EHR technology, and has identical practitioners as the original applicant site. Practices with satellite locations are permitted to participate and will be considered one practice in CPC+. Practices that are part of the same health group or system that share some practitioners are not considered satellite practices and will be counted as separate practices for the purposes of CPC+. Practices that see all or the majority of their patients in the home are eligible for participation in CPC+ and are expected to meet the same care delivery and EHR technology requirements. Despite not seeing all their patients in a single physical location, these practices must still use a single address for billing.

Eligible applicants are primary care practices (all NPIs billing under a TIN at a practice site address who are included on a Participant List, as defined in Appendix B of the [CPC+ Request for Applications](#)) that pass program integrity screening, provide health services to a minimum of 150 attributed Medicare

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beneficiaries, and can meet the requirements of the CPC+ Participation Agreement. Practices will apply directly to the track for which they believe they are ready; however, CMS reserves the right to offer a practice entrance into Track 1 if they apply to but do not meet the eligibility requirements for Track 2.

Q: What is the definition of a primary care practitioner?

In CPC+, CMS defines “primary care practitioner” as a physician (MD or DO), nurse practitioner (NP), physician assistant (PA), or Clinical Nurse Specialist (CNS) who has a primary specialty designation of family medicine, internal medicine, or geriatric medicine.

Q: Are offers to assist practices in preparing for and completing their application affiliated with CPC+?

No, any offers to assist practices in enhancing their eligibility and completing their application are not affiliated with CPC+. CMS does not endorse, encourage, or discourage prospective applicants from seeking application assistance from external vendors. Reference to any specific commercial product, process, or service by trade name, trademark, manufacturer, or otherwise, does not necessarily constitute or imply its endorsement, recommendation, or favoring by the U.S. Government, CMS, or any of their employees or contractors.

Q: Are specialists within a primary care practice considered participating providers in CPC+?

No, only primary care practitioners will be considered participants in CPC+. For example, if a multispecialty practice participates in CPC+, CMS will only attribute beneficiaries who are in treatment relationships with the primary care practitioners at the practice. CPC+ is designed to attract those practices offering comprehensive primary care for an entire population of patients. CMS intends to support practices that are predominantly – but not exclusively – composed of primary care practitioners for whom primary care services accounted for at least 60 percent of billing under the Medicare Physician Fee Schedule.

Q: Can practices in the same health system or medical group apply to CPC+?

Yes, CMS encourages all practices, including those with the same owner, medical group, or ACO to apply to CPC+. Practices owned by health systems will be required to identify the practice names and TINs of each primary care practice within the system that is applying to CPC+. Each practice owned by a health system must provide a signed letter by system leadership that commits to segregate funds paid as a result of participation in CPC+. More details about selection of affiliated practices is [available below](#).

Q: Can practices in the same health system or medical group join different tracks of CPC+?

Yes, CMS encourages all practices, including those with the same owner, medical group, or ACO to apply to the program track in which they feel best qualified to participate.

Q: How does a practice demonstrate that they have multi-payer support?

In their applications, practices will have the opportunity to outline their 2015 revenue generated by services provided to patients covered by the payers with whom we expect to partner with in their region. Practices that have approximately 50 percent or more of their current revenue generated from these payers and Medicare will be better positioned to implement the service delivery model and meet the practice requirements. Medicare alone cannot provide the adequate supports that practices need to make significant changes in the way they deliver care, as primary care practices serve patients whose health care is paid for many different insurers. CMS has provided interested practices with [a list of the payers](#) that have been provisionally selected to partner with Medicare in CPC+.

Q: Can practices participating in CPC+ use more than one billing TIN for primary care services?

No, CMS requires primary care practices participating in CPC+ to use one billing TIN for all primary care services provided in the participating practice.

Q: Can practices share a TIN with another practice within their group or organization?

Yes, a practice's TIN may be shared with other practices with a medical group or organization. The CPC+ practice application will require practice applicants to identify specific practitioners by their National Provider Identifier (NPI) who bill under that TIN and will be participating in CPC+.

Q: What is a Medicare Eligible Professional (EPs) and Eligible Clinician under MACRA? Are they different?

Eligible Clinician is the term used for purposes of the proposed Quality Payment Program and encompasses certain types of Medicare suppliers specified in the [proposed rule](#). Eligible Clinician has the meaning of the term Eligible Professional (EP). EP is defined in [Section 1848\(k\)\(3\)\(b\)](#) and is specific to current Medicare programs (Physician Quality Reporting System, Value-based Modifier, and Meaningful Use) that, by statute, will sunset at the end of 2018.

Q: I have additional questions on the CPC+ model and the application process. How can I get more information? Whom at CMS should I contact?

CMS will provide the following opportunities and materials for prospective applicants to learn more about CPC+ and ask questions:

- [Twenty Open Door Forums](#) throughout August and September, featuring Question and Answer sessions, overviews of key model elements, and step-by-step instructions for completing the CPC+ Practice Application;
- Application Toolkit, including an overview of CPC+, an introduction to the care delivery model and expectations for PY2017, sample financial examples, and an application checklist;
- Frequently Asked Questions for prospective practice applicants, which will be updated on an ongoing basis based on questions received throughout the application period;
- On-demand [CPC+ Video Series](#) on the CMS YouTube page, which provide an overview of the capabilities practices will develop in CPC+, as well as the three major payment streams for Tracks 1 and 2;
- CPC+ Help Desk, which may be reached via email CPCplus@cms.hhs.gov or phone at 1-844-442-2672 from 8:30a.m. – 7:30p.m. ET.

PRACTICE ELIGIBILITY

Q: What is the eligibility criteria for Tracks 1 and 2 of CPC+?

In order to participate, all CPC+ practices must have multi-payer support, Certified EHR Technology (CEHRT), and other infrastructural capabilities. When they apply, Track 2 practices must demonstrate additional clinical capabilities to deliver comprehensive primary care.

CPC+ Practice Demographic Information and Eligibility Criteria:

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Track 1

- Practice structure and ownership information, including number of practice sites and practitioners in the organization, practice TINs, participation in Medicare programs and demonstrations, information and NPIs for each primary care practitioner in the practice;
- Use of CEHRT;
- Sufficient revenue generated by Medicare and CPC+ payer partners;
- Existing care delivery activities must include: assigning patients to provider panel, providing 24/7 access for patients, and supporting quality improvement activities.

Track 2

- Practice structure and ownership information, including number of practice sites and practitioners in the organization, practice TINs, participation in Medicare programs and demonstrations, information and NPIs for each primary care practitioner in the practice;;
- Use of CEHRT;
- Sufficient revenue generated by Medicare and CPC+ payer partners;
- Existing care delivery activities must include: assigning patients to provider panel, providing 24/7 access for patients, and supporting quality improvement activities, while also developing and recording care plans, following up with patients after emergency department (ED) or hospital discharge, and implementing a process to link patients to community based resources.
- Letter of support from health IT vendor that outlines the vendor's commitment to support the practice in optimizing health IT

Q: Are pediatric practices eligible to participate in CPC+?

Eligible practitioners are those who have a primary specialty designation of family medicine, internal medicine, or geriatric medicine, and for whom primary care services accounted for at least 60 percent of billing under the Medicare Physician Fee Schedule. Even if pediatric practitioners have those specialty designations, it is unlikely that pediatric practices will be eligible to participate due to the CPC+ requirement that primary care practices must have at least 150 attributed Medicare fee for service beneficiaries to be eligible for this model.

Q: Are federally qualified health centers (FQHCs) and rural health clinics (RHCs) eligible to participate in CPC+?

No, CPC+ is designed to test payment reform for traditional fee-for-service payment, and the billing processes for FQHCs and RHCs are distinct from other primary care practices. Because FQHCs and RHCs do not submit claims on a Medicare Physician/Supplier claim form (CMS 1500) and are not paid according to the Medicare Physician Fee schedule for office visits, they are not eligible for participation.

Q: Are practices only eligible if they are a certified Patient Centered Medical Home (PCMH)?

No, practices are not required to be PCMH certified to participate in CPC+. However, the care delivery eligibility requirements to participate in CPC+ may align with criteria for PCMH certification. The care delivery eligibility criteria are:

CPC+ Practice Frequently Asked Questions

Track 1

- Existing care delivery activities must include: assigning patients to provider panel, providing 24/7 access for patients, and supporting quality improvement activities.

Track 2

- Existing care delivery activities must include: assigning patients to provider panel, providing 24/7 access for patients, and supporting quality improvement activities, while also developing and recording care plans, following up with patients after emergency department (ED) or hospital discharge, and implementing a process to link patients to community based resources.

Q: Are hospital owned practices eligible to apply to CPC+?

Yes, practices owned by hospitals and health systems are eligible to apply to CPC+. CPC+ is a practice-level transformation and each practice owned by a hospital must provide a signed letter by hospital leadership that commits to segregate funds paid by CMS to the practice as a result of participation in CPC+ (i.e., the CPC+ care management fee, performance-based incentive payment, and Comprehensive Primary Care Payment (Track 2 only)).

Q: Are Independent Practice Associations (IPAs) eligible to apply to CPC+?

Yes, practices within an IPA are eligible to apply to CPC+. Practices within an IPA must apply separately to participate in CPC+, as CPC+ is a practice-level transformation.

Q: Can a practice participate in a commercial ACO or a commercial Clinically Integrated Network (CIN) while participating in CPC+?

Yes, CPC+ participating practices may participate in other programs with private payers.

Q: Are concierge primary care practices eligible to apply?

No, concierge practices, or any practice that charges patients a retainer fee as of January 1, 2017, may not participate in CPC+.

Q: Is a practice that offers other lines of business, such as urgent care on weekends and/or physical exams for an insurance company eligible for CPC+?

Yes, practices may offer other lines of business while participating in CPC+. However, payments provided by CMS as a result of participation in CPC+ may not be used for these other lines of business. CPC+ practices will work to ensure patients have access to care and build long-term continuous relationship with patients, while they closely manage and provide comprehensive care for their patients, particularly those with complex needs.

Q: Are practices engaged in training future primary care practitioners and staff eligible to apply to CPC+?

Yes, CMS encourages all practices to apply, especially those engaged in training future primary care practitioners and staff.

Q: Is CMS giving preference to practices that serve minority populations?

CMS strives to ensure that minority populations are served by CPC+, while also selecting a representative sample of primary care practices in the CPC+ regions. In order to understand the demographics of a practices' patient population, practices are encouraged to complete questions 30-32 in the practice application to their best of their ability.

PRACTICE SELECTION

Q: How will practices be selected for CPC+?

First, CMS will screen all practices for program integrity issues. Then, CMS will review all applications to determine if a practice meets the eligibility criteria for the CPC+ track for which they are applying. If a practice is determined not to meet the requirements for Track 2, but also expressed interest in Track 1, CMS will consider the practice's application for Track 1 instead. Next, CMS will review financial information provided by the practice to determine if they meet the threshold for payer support. Practices should have at least approximately 50 percent of their total practice revenue from both Medicare and CPC+ payer partners. CMS will also evaluate the practice's health IT capabilities and vendor information (Track 2 only) based on information provided by the practice in their application. If there are more practices for each CPC+ track that meet the eligibility criteria and have sufficient payer support than there are open slots, CMS plans to use a lottery system to select practices and each track will have a separate lottery.

Q: What is the CPC+ lottery?

If CMS receives eligible applications from a large number of practices in either program track, CMS will conduct a lottery, randomly selecting which practices are ultimately accepted to CPC+ from the pool of eligible applicants.

Q: If CMS uses a lottery to select practices for CPC+, do current CPC practices have to enter the CPC+ lottery?

No, practices in the original CPC model have already made a significant investment in strengthening primary care, and CMS wishes to evaluate the long-term impacts of practice transformation. Therefore, if their region is selected for CPC+, current CPC practices will be able to bypass the initial lottery process and join CPC+ directly, as long as they are active participants in CPC and meet all CPC+ eligibility requirements at the time of application.

Original CPC practices that are accepted directly to CPC+ will not be guaranteed assignment to a particular program track; practices will apply to their desired track and CMS will accept them contingent on eligibility. All practices, new and returning, must submit individual applications to CPC+.

Q: Does current CPC performance affect practice eligibility for CPC+? Can former CPC practices bypass the practice lottery?

CMS will continue to monitor practices participating in the original CPC initiative as usual in 2016. Practices subject to a Corrective Action Plan (CAP) remain eligible for CPC+, and will be able to bypass the CPC+ practice lottery. However, should the practice fail to improve the relevant deficiencies as required, these practices will be terminated from CPC as indicated in their CAP letter.

If a practice is terminated from CPC prior to the selection of CPC+ practices, that practice may still apply to CPC+ (or their existing application will still be considered) but they will be subject to the practice lottery. If a practice is terminated from CPC after having been accepted to CPC+, that practice will not receive any payment for the remainder of the original CPC initiative but may still participate in CPC+. CMS may rescind acceptance of a terminated practice into CPC+.

Any practices that have withdrawn from the original CPC initiative may apply to CPC+ and will be subject to the lottery. CMS may deny acceptance to CPC+ to any practice for any reason.

CPC+ Practice Frequently Asked Questions

Q: If there is a practice lottery, will practices in the same health system, ACO, or medical group be accepted to CPC+ together?

CMS is striving to maintain the rigor of the CPC+ evaluation by randomly selecting practices to participate in CPC+. Because CMS is interested in testing the impact of CPC+ in system-wide primary care practice transformation, CMS will, to the extent possible, accept into CPC+ all eligible practices owned by the same entity (e.g., health system or medical group) and all eligible practices participating in the same ACO. Practices in IPAs and other affiliation groups will be selected at the practice level.

Because CPC+ is a practice-level intervention, every practice applying to CPC+ must submit its own application and will be evaluated individually at the practice level for both initial eligibility and all performance-based incentive payments.

Q: If there is a practice lottery, will practices in the same health system, ACO, or medical group as current CPC participants be given priority?

No. Practices that did not participate in the original CPC initiative will not be allowed to bypass the lottery. While CMS strives to support system-wide primary care practice transformation, the nature of the randomized lottery is such that practices not currently participating in the original CPC initiative cannot be given preference. Therefore, CMS cannot guarantee that new applicants from the same entity as original CPC practices will be accepted. CMS understands that some original CPC practices may choose not to participate in CPC+ if other practices in their larger organization are not accepted.