

## **Transforming Clinical Practice Initiative**

### **Funding Opportunity Announcement Frequently Asked Questions**

(Excerpt from CMMI, TCPI FAQ) Updated December 29, 2014

Q. Is TCPI limited only to eligible providers like physicians, certified nurse practitioners and physician assistants? For example, are pharmacists, nurses, social workers, community health workers, optometrists, residents and others also able to participate in TCPI?

A. While TCPI cost savings estimates and overall goals are linked directly to eligible providers, CMS anticipates that pharmacists, nurses and other clinicians will participate in the initiative and will be valuable and essential members of many practice transformation teams.

Q. When will CMS require participating clinicians under PTNs to participate in Physician Quality Reporting System and Value Based Payment Modifiers?

A. CMS expects all eligible professionals (those meeting PQRS eligibility criteria) to participate in PQRS as soon as possible. This would be true for the Value Modifier program as allowed by the published value modifier participation requirement. We note however, that not all clinicians participating in TCPI would be eligible to participate in PQRS and the Value Modifier Program. For example, clinicians working FQHCs do not participate in PQRS and the Value Modifier. While not participating in PQRS and the Value Modifier, these FQHC clinicians are welcome to be part of TCPI, and will have to link their work and their reporting to the overall goals of TCPI.

Q. If a practice or clinicians within a practice are receiving transformation support that is funded under a State Innovation Models (SIM) grant, would they be excluded from participation in the Practice Transformation Network?

A. CMS seeks synergy and alignment between the State Innovation Models and the Transforming Clinical Practice Initiative. Depending on the nature of the SIM initiative, it may be possible for clinicians to participate in both. CMS expects PTNs and SIM grantees to team with one another to develop and document synergistic, non-duplicative approaches to work in this arena. The federal government cannot pay twice for the same service.

Q. Who can participate as a Practice Transformation Network? (Please Note that this list is based on the inquiries to date and will be updated as necessary.) Listed below are organizations that can participate as a PTN: ☐

A. Associations, Clinical Management Organizations, Clinical Integration Networks, Commercial Insurers, Community Mental Health Agencies, Delivery System Reform Incentive Payment(DSRIP) Program, For-

profit organizations, Groups of Health Networks collaboratively Independent Hospitals, Independent Physician's Associations, Home Health organizations, Hospice organizations, HRSA Funded Health Center Controlled Network (HCCN), Integrated Health Systems, Medical Schools, Medical Research Centers, Physician Groups (any type)

Additional Details: QIO Prime Contractors (QINs): QIOs will be offered a task to perform TCPI-related assessments. In order to apply to be a PTN, the QIO would have to refuse this additional task. QIOs will receive additional guidance from their contracting officer.

QIO Subcontractors: May apply provided they are not currently doing tasks that they would be funded for under TCPI. Applicants should provide details explaining the lack of overlap.

CPCI transformation contractor: They must detail in their application how the work performed under TCP will not duplicate other efforts.

Q. Can an MSSP, MAPCP, Pioneer ACO or CPCI participate as a PTN?

A. Through the Transforming Clinical Practice Initiative, CMS desires to perform different but similar work to MSSP, MAPCP, CPCI and ACO. As such, it would not be possible for an organization whose sole function is to administer the MSSP, MAPCP, CPCI and ACO to participate as a PTN since the work performed under each program would not be able to be differentiated. Other organizations who predated the formation of an MSSP, MAPCP, CPCI or ACO and who administer the MSSP, MAPCP, CPCI or ACO as one part of their organization may apply to be a PTN provided that it is has a distinct organizational and operational structure from the MSSP, MAPCP, CPCI or ACO. A strategy that details how an applicant intends to prevent duplication of effort should be included in the project narrative.

Q. Are clinicians participating in the Medicare Shared Savings Program, Pioneer ACOs, Comprehensive Primary Care Initiative or Multi-Payer Advanced Primary Care Practice eligible to participate in TCPI?

A. No, they are not eligible for technical assistance under a PTN in TCPI. However, these clinicians might potentially serve as faculty resources to PTNs

Q. Will CMS consider alternate TCPI metrics?

A. Yes. An applicant may propose additional metrics as applicable and appropriate. It is critically important that any metrics proposed connect in direct and measurable ways to improved patient outcomes, reduction in over-utilization, and/or cost savings, and that the applicant commits to specific outcome and cost reduction achievements. CMS will review the proposed metrics as part of the application.

Q. Will RHC/FQHC clinic providers qualify for this program? Can multiple locations of an FQHC participate within this project?

A. Yes, FQHC clinicians are eligible to be supported through a PTN. Clinicians supported by an FQHC with multiple delivery sites may be counted together to be supported by a single PTN. The important variable is that the support by the PTN be proposed in a design/manner that will support the needs of the participating clinicians

Q. Are clinicians who were formerly part of MSSP, MAPCP, Pioneer ACO or CPCI but are no longer participating in that program eligible for participation in TCPI through a PTN? Can clinicians voluntarily withdraw from one of these programs to partner with a PTN for technical support?

A. There are no prohibitions on the recruitment of clinicians who are not currently participating in these programs. PTNs are expected to foster clinician transformation and should require a commitment of transformation from clinicians that it agrees to support. The AIMS of the shared service program to support movement toward advance payment programs such as those referenced therefore we do not encourage withdrawal.

Q. Are clinicians in specialties such as mental/behavioral health and pediatrics eligible for support via a PTN?

A. Yes, medical doctors (M.D. or D.O.), nurse practitioners, and physician assistants practicing in clinical settings are eligible for support through a PTN.

## **References**

<https://innovation.cms.gov/Files/x/TCPI-External-FAQs7.pdf>