Quality Payment Program (QPP) – CJR Model Track Selection Reporting Instructions Summary

As of 2017, Track 1 of the Comprehensive Care for Joint Replacement (CJR) model is an Advanced Alternative Payment Model (APM) under the CMS Quality Payment Program¹.

CJR Participant Hospitals that elect to participate in Track 1 of CJR must use Certified Electronic Health Record Technology (CEHRT) as defined in 42 CFR 414.1305 to document and communicate clinical care to their patients or other health care providers. CJR Participant Hospitals must elect which track of CJR they intend to participate. CJR Participant Hospitals electing Track 1 must attest to their CEHRT use as instructed below.²

Track 1 and Track 2 Election:

As of 2017 there are two participant Tracks in the CJR Model:

- Track 1, which is an Advanced APM; or
- Track 2, which is not an Advanced APM.³

Each CJR Participant Hospital makes this model Track election on an annual basis.

CEHRT Use Attestation:

42 CFR 510.120(a) states that each CJR Participant Hospital that elects Track 1 must attest to its use of CEHRT as defined in 42 CFR § 414.1305.

CJR model track selection and CEHRT use attestation for the purposes described above must be made on Tab 2 of the attached Excel document.

Financial Arrangements - Gainsharing Arrangement Reporting Instructions

In an effort to minimize burden to the extent possible, CMS is combining the collection of information on participant hospitals' track selection and CEHRT use and on financial arrangements. If a participant hospital chooses CEHRT use (Track 1), the CJR model team will use the information provided for financial arrangements for the clinician financial arrangement list.⁴

¹ More information about the Quality Payment Program is available at http://qpp.cms.gov/

² 42 CFR 510.120(a)

³ See the Advancing Care Coordination through Episode Payment Models final rule (81 FR 50794), available at https://www.gpo.gov/fdsys/pkg/FR-2017-01-03/pdf/2016-30746.pdf

⁴ Under 42 CFR 510.120(b), each participant hospital that chooses CEHRT use must submit to CMS a clinician financial arrangements list in a form and manner specified by CMS on a no more than quarterly basis.

Authority for Collection of Financial Arrangement Information:

To ensure all participant hospitals' compliance with the requirements of the CJR model, under 42 CFR 510.500(e) participant hospitals <u>must</u> provide to CMS evidence sufficient to enable the audit, evaluation, inspection, or investigation of the individual's or entity's compliance with CJR requirements, the quality of services furnished, the obligation to repay any reconciliation payments owed to CMS, or the calculation, distribution, receipt, or recoupment of gainsharing payments, alignment payments, or distribution payments. Therefore, when requested by CMS, each participant hospital must provide to CMS a list of previous and current collaborators and, if applicable, a list of practice collaboration agents.

Rather than requesting that participant hospitals submit two separate lists (both for monitoring and QPP purposes), CMS is directing hospitals to include all information requested for financial arrangements in one Excel document. When submitting this list, participant hospitals may also select either Track 1 or Track 2 participation in the CJR model and if selecting Track 1, attest to CEHRT use for this purpose.

Submission Instructions

To reduce confusion, we established specific, detailed instructions for completing the attached Excel document. Please follow the instructions below:

1. Hospitals Not Selecting Track 1 Participation and No Financial Arrangements Established.

- The participant hospital does not select Track 1 in the CJR model as an Advanced APM for 2017 and selects Track 2.
- The participant hospital has never executed any financial arrangements under the CJR model.

This hospital should:

- Complete on tab 2 of the Excel spread sheet,
 - Answer for Question 1 only- "Participant Hospital Legal Name" and "Participant Hospital's CCN"
 - Answer Question 2

2. Hospitals Not Selecting Track 1 Participation and Financial Arrangements Established.

- The participant hospital does not select Track 1 in the CJR model as an Advanced APM for 2017 and selects Track 2.
- The participant hospital has executed financial arrangements under the CJR model, meaning a participant hospital has established a collaborator agreement with an eligible CJR collaborator for purposes of gainsharing under the CJR

model. Additionally, if a CJR collaborator is a Physician Group Practice (PGP), then please confer with the PGP to inquire whether the PGP has executed any distribution arrangements with its PGP members for purposes of distributing any gainsharing payment it receives from the participant hospital. For those PGP members that executed a distribution arrangement with the PGP, these members are considered practice collaboration agents, whose information should be provided in this collection.

This hospital should:

- Complete all questions on tab 2 of the Excel spread sheet
- Provide ALL previous and current collaborators' information on tab 3 This
 includes physicians, nonphysician practitioners, provider or supplier of
 outpatient therapy services, including therapist in private practice, physician
 group practices, skilled nursing facilities, home health agencies, long-term care
 hospitals, and inpatient rehabilitation facilities.
- Collaborator agreement with a Physician Group Practice and Distribution arrangements
 - o If the participant hospital has established a collaborator agreement with a PGP, but the PGP has <u>NOT established</u> any distribution arrangements with its PGP members, do not complete tab 4 of the Excel spread sheet.
 - o If the participant hospital has established a collaborator agreement with a PGP, and the PGP <u>HAS established</u> any distribution arrangements with its PGP members, complete tab 4 of the Excel spread sheet.

3. Hospitals Selecting Track 1 Participation and Financial Arrangements established.

- The participant hospital selects Track 1 in the CJR model as an Advanced APM for 2017. The participant hospital attests to its use of CEHRT as defined in 42 CFR 414.1305 to document and communicate clinical care with patients and other health professionals by completing Tab 2.
- The participant hospital has executed financial arrangements under the CJR model, meaning a participant hospital has established a collaborator agreement with an eligible CJR collaborator for purposes of gainsharing under the CJR Model. Additionally, if a CJR collaborator is a Physician Group Practice (PGP), then please confer with the PGP to inquire whether the PGP has executed any distribution arrangements with its PGP members for purposes of distributing any gainsharing payment it receive from the participant hospital. For those PGP members that executed a distribution arrangement with the PGP, these members are considered practice collaboration agents, whose information should be provided in this collection.

This hospital should:

- Complete all questions on the tab 2 of the Excel spread sheet
- Provide ALL previous and current collaborators' information on tab 3- This
 includes physicians, nonphysician practitioners, provider or supplier of
 outpatient therapy services, including therapist in private practice, physician
 group practices, skilled nursing facilities, home health agencies, long-term care
 hospitals, and inpatient rehabilitation facilities.
- Note: For collaborator agreement with a Physician Group Practice and Distribution arrangements:
 - o If the participant hospital has established a collaborator agreement with a PGP, but the PGP has <u>NOT established</u> any distribution arrangements with its PGP members, do not complete tab 4 of the Excel spread sheet.
 - o If the participant hospital has established a collaborator agreement with a PGP, and the PGP <u>HAS established</u> any distribution arrangements with its PGP members, complete tab 4 of the Excel spread sheet.

Submission Instructions- How and When to Submit.

Complete and submit the attached Excel form to CJRsupport@cms.hhs.gov by **8:00PM EDT on**October **20, 2017**. Please include the CCN of your hospital in the subject line of the submitted email. [Example: CCN 123456_CEHRT.Financial Arrangement List]

If you are the point of contact for multiple hospitals in the CJR model, you may send one email. Complete and attach a separate Excel file for each hospital. Please include all of the hospitals' CCNs in the subject line of the submitted email.

ALERT: If the information submitted contains a Tax Identification Number (TIN) that is also Social Security Number (SSN), the submission MUST be sent securely. Please **DO NOT** email unique encryption passwords to the help desk. If you use this method, please include a telephone number that our contractor can call to obtain the password directly.

Please contact the CJR model team at CJRSupport@cms.hhs.gov for questions related to this email.

Thank you for your continued participation in the CJR model.