

## Bundled Payments for Care Improvement (BPCI) Advanced Model Overview Open Forum

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**2:00 PM ET**

Webinar Transcript

**Operator:** Hello and thank you for joining the BPCI Advanced Model Overview Open Forum. To hear today's presentation, please turn on your computer speakers or you can dial into the audio conference line via the phone at 800-832-0736 and enter the room number 6523769, # when prompted. To avoid any audio issues relating to an echo, please connect your audio using only one of these options. Note, today's webinar is being recorded. During today's presentation, all Participants will be in a listen-only mode. Please feel free to enter any questions you may have throughout today's presentation in the Q&A pod displayed on the bottom right hand corner of the meeting room window. A short survey will also be available at the end of the presentation. It is now my pleasure to turn the Webinar over to our first presenter for today, Brian Footer. Please go ahead.

**Brian Footer:** Thank you, Patricia. Hello, everyone. Thank you for joining us. On behalf of the CMS Innovation Center, I'd like to welcome you to today's discussion, BPCI Advanced Model Overview Open Forum. My name is Brian Footer, and I am joined by two members of the BPCI Advanced team, who'll be walking through today's material and answering questions throughout today's event.

We will begin today's open forum by providing background on the process for collecting and prioritizing questions. We'll then address a number of common questions by breaking down the application roadmap for Model Year 3 into three sections: One, the application window; Two, the review window; Three, the decision window. Finally, we will spend time presenting and answering questions submitted by you, prospective applicants and current Participants of BPCI Advanced. Questions have been organized into the following five groups: One, before getting started; Two, accessing the portal; Three, filling out an application or template; Four, after submitting an application or template; and Five, Model Year 3.

When you registered for today's event, we encourage you to submit questions to the team in advance. We received a great number of questions via the registration link, the BPCI Advanced email inbox and the BPCI Advanced Connect site. We read them all and sorted them into categories. We then looked at trends of questions and have selected those that we believe are of interest to the majority of the audience and/or highlight specific topics that need clarification from CMS.

Throughout this event, feel free to submit additional question via the Q&A feature for members of the team to review. We plan to create new and expand existing Frequently Asked Question documents to include the questions presented during this open forum, additional questions submitted in the event registration and select question from the Q&A feature today.

We encourage you to visit the BPCI Advanced homepage to find the frequently asked question document in addition to a number of other materials. Additionally, look for email from [bpadvanced@cms.hhs.gov](mailto:bpadvanced@cms.hhs.gov) with important event announcement, resources and greater details about the Model.

The questions that were submitted covered a wide range of Model topics. CMS was eager to get the application period underway to give applicants a full 60 days to apply. Unfortunately, that means that some of the details are still being finalized. Therefore, at this time, CMS is unable to provide updates on policy or methodology decisions regarding Model overlap, quality measures and pricing. We understand that some of these elements may impact participation in the Model and organizations' decision to apply to participate in the Model. CMS intends to update its new applicants and current Participants and provide learning activities on these topics once these items become finalized.

If you are unsure about applying, it is our recommendation to submit an application by June 24, 2019. The application is not a legally binding document that commits you to participate in BPCI Advanced in Model Year 3. If at any point between submitting an application and signing a Participation Agreement in November you would like to withdraw your application, you can simply email the BPCI Advanced team a withdrawn notification as outlined on Page 10 of the request for application document located on our website.

Now that we've gotten the housekeeping out of the way, it's my pleasure to introduce my colleague, Sacha Wolf, who will start us on our journey through the application timeline. Sacha?

**Sacha Wolf:** Thank you, Brian. The application roadmap for Model Year 3 provides general milestones applicable to everyone, including new applicants, current Participants that submitted templates and current Participants that do not plan on making changes in Model Year 3. Each timeframe highlights key details to help new applicants and current Participants organize resources and prepare for deadlines. Throughout the next several slides, we will break down the roadmap into three windows and identify important items that may require new applicants and current Participants to take action.

We begin the timeline with the application window, which runs from April 24, 2019 through June 4, 2019. This 60-day window is relevant to applicants submitting an application in the Application Portal and current Participants submitting either an EI Addition Template or an EI Restructure Template in the Participant Portal. If you're a current Participant that wishes to continue participating as is, you do not need to do anything during the application window. Current Participants are not required to submit an application or a template in order to receive baseline data and preliminary Target Prices for their current Episode Initiators nor do they have to submit an application in order to add Clinical Episodes for Model Year 3. We will cover this in greater detail when we review the next two timeline windows.

It's important to note that CMS will not accept application or template submissions after June 24, 2019. We do not recommend waiting until the last day to submit your application. Finally, we do not plan on having another application submission period. As Brian mentioned earlier, if you're unsure if you should apply or not, we recommend submitting an application.

CMS has developed a number of resources to help new applicants and current Participants successfully navigate the application process. To find the documents listed here and other helpful materials, please visit the BPCI Advanced homepage.

Now, I'd like to turn it over to my colleague, Julia Byram, to walk us through the remaining two windows of the application roadmap. Julia?

**Julia Byram:** Thank you, Sacha. The second window in our timeline is the review window. Between June and July, CMS will screen applications and template submission, which include the Episode Initiator (EI) Addition Template and the EI Restructure Template. In addition to reviewing applications and templates for completeness

and thoroughness, the screening process includes working with CMS' Center for Program Integrity to vet applicants and potential new Episode Initiators.

Also, during this time, CMS will work on calculating preliminary Target Prices, extracting baseline data and drafting the Participation Agreement for all new applicants and current Participants. In September, new applicants and current Participants, regardless of whether you've submitted a template or not, will receive the following material shown on the next slide.

Baseline claims data from October 1, 2015, through September 30, 2018; preliminary Target Prices for all Episodes, where there was sufficient volume of data in the baseline period; and the Participation Agreement for Model Year 3. CMS will only provide the requested aggregate historical and/or raw historical claims data and preliminary Target Price of new applicants that successfully submit a Data Request and Attestation form (DRA), which is the part of the application due on June 24, 2019. Current Participants that submit an EI Addition Template or EI Restructure Template do not need to submit a new DRA with their template.

New applicants and current Participants will receive baseline data and preliminary Target Prices via the BPCI Advanced data portal and receive the Participation Agreement for the Model Year 3 via the Participant Portal. CMS will provide instructions about obtaining access to this portal prior to releasing the material. For your reference, you may review technical documents from Model Years 1 and 2 on the BPCI Advanced Participant resource page. Updated documents for Model Year 3 will become available closer to the time when you receive data.

The final section of the timeline is the decision window. In November, new applicants and current Participants will have had approximately two months to review their data and the Participation Agreement for Model Year 3. Everyone who wishes to participate in BPCI Advanced for Model Year 3 will be required to submit a signed agreement and completed Participant Profile. The Participant Profile is the document where new applicants and current Participants will indicate which Episode Initiators and Clinical Episodes they want to be held accountable for in Model Year 3. Therefore, this is the opportunity to add or withdraw Clinical Episodes, including new Clinical Episodes for Model Year 3.

In December, new applicants and current Participants will be required to submit the first round of the deliverable for Q1 2020. Also, in December, new applicants

and current Participants who submitted an EI Restructure Template will be required to submit a Participant DRA form. CMS will review all submitted documents and will notify new applicants and current Participants selected for participation in BPCI Advanced for Model Year 3 starting on January 1, 2020.

In addition to the Participant Profile, there are three deliverables to submit in December for Q1 2020. The first deliverable is the Care Redesign Plan, which is a required document that describes the specific planned interventions and changes to the Participants' current health care delivery system. The second required deliverable is the Quality Payment Program List, also known as the QPP List, which identifies the eligible clinicians that meet requirements included in the quarterly report that the BPCI Advanced model team submits to the QPP team for the qualifying Alternative Payment Model (APM) Participant determination. The third deliverable is the Financial Arrangement List, also known as FAL. This document includes the list of organizations and/or individuals with whom the Participant intends to enter into a financial arrangement in BPCI Advanced.

Now, I would like to turn it back to my colleague, Brian Footer, to facilitate question-and-answer portion of the open forum. Brian?

**Brian Footer:** Thank you, Julia. As mentioned earlier, the following questions were sent in by you. We selected those that we believe are of interest to the majority of the public and/or highlight specific topics that need clarification from CMS. We organized the questions into five groups. I will read the question listed on the slide and call on one of my colleagues to respond. Therefore, our first question: We are currently participating in BPCI Advanced as a downstream Episode Initiator. How do we switch Convener Participants for Model Year 3? For our question, we'll turn it over to our colleague, Sacha Wolf.

**Sacha Wolf:** Thanks, Brian. We've received this question many times. For a downstream Episode Initiator to switch Convener Participants for Model Year 3, both the existing Convener Participant and the new Convener Participant will need to take action. During the application window, the new Convener Participant for Model Year 3 will need to submit either an application in the Application Portal, listing the downstream Episode Initiator on the Participating Organizations attachment, or submit an EI Addition Template in the Participant Portal, listing the downstream Episode Initiator.

When Participant Profiles are due in November of 2019, the existing Convener Participant for Model Year 1 and 2 would need to select withdrawal for the downstream Episode Initiator and all their corresponding Clinical Episodes. The new Convener Participant for Model Year 3 would have to submit their Participant Profile, ensuring to select “Active” for the downstream Episode Initiator and “Active” for at least one Clinical Episode.

We recognize this is one scenario and switching roles in Model Year 3 was a popular question. In response, CMS emailed current Participants on May 9, 2019, the greater details on the options for switching roles and switching Convener Participants. We recommend referencing this email, which includes seven frequently asked questions and reading it in its entirety as there may be more than one applicable option depending on the role change. The email has also been added to the announcement section of the Participant Portal.

**Brian Footer:** Thank you. Our next question: If I am a current Participant in BPCI Advanced and do not want to make any changes to my EIs and Clinical Episodes, is there any action I have to take before June 24, 2019? For this question, we’ll go to our colleague, Julia Byram.

**Julia Byram:** Thank you, Brian. Current Participants that would like to continue participating as is for Model Year 3 do not need to take action by June 24, 2019. Current Participants will still receive baseline data and preliminary Target Prices in September for all Clinical Episodes where there was sufficient volume in the baseline period. However, these Participants will be required to submit a Participation Agreement and Participant Profile in November 2019 and other Model deliverables in December 2019. Current Participants that do not submit a Participation Agreement and the necessary Model deliverables will not be able to trigger Clinical Episodes after December 3, 2019.

**Brian Footer:** Thank you. Our next question: We are new to BPCI Advanced and are unsure if we want to apply as a Convener Participant or as a non-Convener Participant. Do we have the ability to submit both types of application? For this, let’s go to Sacha Wolf.

**Sacha Wolf:** Thanks Brian. Yes, an applicant can submit both a Convener Participant application and a non-Convener Participant application. In order to submit a Convener Participant application, the applicant will need to list at least one downstream Episode Initiator on the Participating Organizations attachment. In order to submit a non-Convener application, the applicant will need to be either

an acute care hospital or a physician group practice, and they will not have any downstream Episode Initiators.

**Brian Footer:** Thank you. Our next question: We were in BPCI Advanced but dropped out of all of our Clinical Episodes. Do we have to complete a whole new application to gain access to data for future evaluation? For this, let's go to Julia Byram.

**Julia Byram:** Yes. Participants who've fully terminated their BPCI Advanced participation will be required to submit a new BPCI Advanced application by June 24, 2019, in the Application Portal in order to receive baseline data and preliminary Target Prices in September 2019.

**Brian Footer:** Thank you. Our next question: We're a physician group practice that recently applied for a new tax identification number (TIN). Can we submit an application even if all our providers have not started billing under the new TIN? For this, let's turn to Sacha Wolf.

**Sacha Wolf:** Thanks, Brian. This is a great question. Yes, you can submit an application with your new tax identification number, or TIN, even if all the providers have not reassigned their rights to receive Medicare payments to the new TIN. At the time of signing the Participation Agreement, you will need to comply with all the conditions and requirements of the agreement. Since your new TIN will not have any historical claims data during the baseline period, it is imperative that you submit the Participating Organizations attachment in the Application Portal in order to receive preliminary Target Prices. Specifically, you will need to list all the hospital CMS certification numbers where the new physician group practice TIN may trigger Clinical Episodes.

**Brian Footer:** Thank you. Our next question: As a physician group practice, are we able to choose the hospital that we participate with or do we have to participate with all hospitals within our practice area? For this, let's go to Julia Byram.

**Julia Byram:** Thank you, Brian. No, a physician group practice does not need to participate with all hospitals within its practice area. However, it will need to provide a hospital CMS certification number, or CCN, for all of those hospitals where the practice may trigger a Clinical Episode. For example, if the physician group practice only provides two hospital CCNs, but during the performance period, the practice triggers Clinical Episodes at six hospitals, then the practice would need to be held accountable for Clinical Episodes triggered at all six hospitals regardless of how many CCNs they provided to CMS.

**Brian Footer:** Thank you. The following question deals with accessing the portal. Our first question in accessing the portal: I've registered for the BPCI Advanced Application Portal, but when I try to log in, my username is not recognized. Who do I contact to get this resolved? For this, let's turn to Sacha Wolf.

**Sacha Wolf:** Thanks, Brian. There may be an easy solution for that. Your username to access the BPCI Advanced Application Portal will be the email that you registered with, plus the extension .bpciadv. For example, if my email is Sacha@email.com, then my username will be Sacha@email.com.bpciadv. We have found that most people forget the extension. If that does not resolve your problem, then you can email [cmmiforcesupport@cms.hhs.gov](mailto:cmmiforcesupport@cms.hhs.gov) or call 1-888-734-6433 and select option #5. An easier way would be to find this contact information on the main page of the Application Portal.

**Brian Footer:** Thank you. Our next question: Is there a required length for the free text question on the application? For this, let's turn to Julia Byram.

**Julia Byram:** This is a good one. No, there is no required length. We would like applicants to answer questions to the best of their ability, ensuring responses are complete and remain within the 4,000-character limit or approximately 500 words. It is not necessary to use all 4,000 characters. We recommend that organizations visit the applicant resources page to access templates and other material to prepare and organize responses needed to complete the application in the Application Portal.

**Brian Footer:** Thank you. Our next question: If I start an application, can I have one of my colleagues finish and submit the application? For this, let's turn to Sacha Wolf.

**Sacha Wolf:** Thanks, Brian. Unfortunately, the answer is no. In the Application Portal, if one user starts an application, then only that same user will have the ability to finish and submit the application. Likewise, a user can only clone submitted applications that they submit as they will not have the ability to clone another user's submitted application.

**Brian Footer:** Thank you. Our next question: Who can sign the BPCI Advanced application? For this, Julia Byram.

**Julia Byram:** Thanks. The BPCI Advanced application requires a signature prior to the application submission. The user filling out the application will be prompted on the last page to mark a checkbox certifying that the information and statements and the application are true, complete and accurate, and also an authorized

signatory is qualified and acting as an agent of the application. On the same page, applicants will be required to input the authorized signatory's first and last name, which may or may not be the user filling out the application. The user will have to mark the checkbox and enter the signatory's first and last name before the submit application button will appear.

**Brian Footer:** Great. Thank you. Our next question: Is there a limit to the number of BPCI Advanced application or EI Addition Templates that I can submit? For this, let's turn to Sacha Wolf.

**Sacha Wolf:** Great question. There is no limit to the number of BPCI Advanced applications an organization may submit in the Application Portal. To make the process easier, the Application Portal provides the option to "clone" submitted applications. Note, there are still a number of variables within the application that will need to be updated in each cloned application. Current Participants completing any EI Addition Template should submit one template. However, if you need to make a revision to your submitted template, you can do so by uploading another version in the Participant Portal by June 24, 2019. Only the latest version of the template will be reviewed by CMS.

**Brian Footer:** Thank you. We now move into questions that deal with filling out the application or template. Our first question for filling out an application or template: We applied to BPCI Advanced during the first application period and plan to apply again during this application. Can you let us know what questions have changed between the previous application and the current one? For this, let's turn to Julia Byram.

**Julia Byram:** Thanks, Brian. The BPCI Advanced team made some changes to the application for Model Year 3, most notably reducing the number of application attachments and incorporating the DRA into the application. We also removed some of the questions to decrease administrative burden and added logic to the Participating Organizations attachment upload to ensure we receive clean data. There are two changes we would like applicants to know, but they are not reflected in the Application Portal. The first is the change in the percentage of eligible clinicians in an entity that must use certified electronic health record technology, or CEHRT. For non-hospital Participants, the 50% requirement has been updated to 75% for the 2019 Quality Payment Program rule.

For the attestation response to the first application question, you must meet the current eligible clinician requirement of 75%, likewise for question six and the

quality improvement section of the application. Your response should reference the current eligible clinician requirement of 75%. The second change is in regards to our policy on the 50% Net Payment Reconciliation Amount (NPRA) sharing cap. In your response to question three in the NPRA sharing section of the application, you will not need to address how you will ensure NPRA sharing payments do not exceed 50% of the amount normally paid by Medicare.

**Brian Footer:** Thank you. Our next question: Can an EI be listed on multiple EI Addition Templates with multiple Bundled Payment Identifiers (BPIDs), understanding that they will ultimately be listed on only one Participant Profile, or are EI Addition Templates considered an equivalent of the Participant Profile? To answer this question, let's turn to Sacha Wolf.

**Sacha Wolf:** Thanks, Brian. I can see why this can be confusing. An EI Addition Template is not considered as an equivalent of the Participant Profile. The EI Addition Template allows current Participants to add potential Episode Initiators under their existing Participation Agreement. The Participant Profile is the deliverable where Participants select which Episode Initiators and/or Clinical Episodes they wish to be held accountable for. CMS allows potential Episode Initiators, who are Acute Care Hospitals or Physician Group Practices, to appear in multiple EI Addition Templates and BPCI Advanced applications, including Participating Organizations attachment submitted by the June 24, 2019, deadline. However, at the time of the Participant Profile submission in November of 2019, an Episode Initiator can only appear in one Participant Profile with the status as active. Otherwise, that Episode Initiator will not be eligible to participate in BPCI Advanced.

**Brian Footer:** Thank you. Our next question: The application information for existing Participants states, "A current Participant cannot submit both an EI Addition Template and EI Restructure Template under the same BPID." Does this statement refer to the parent BPID of the Convener, or the downstream Episode Initiator BPID? For this, let's turn to Julia Byram.

**Julia Byram:** Thank you, Brian. This statement refers to the parent BPID, which is the current Participant itself. The current Participants cannot submit an EI Addition Template to add Episode Initiators to its current Participation Agreement and then submit an EI Restructure Template to break apart each Episode Initiator into separate agreements. If a current Participant wants to add new Episode Initiators as single downstream Episode Initiators under separate Participation Agreements, then the current Participant must submit an application in the

Application Portal for each potential Participation Agreement that they would like to have. Submission of an EI Restructure Template is limited to current Convener Participants with more than one downstream Episode Initiator. Therefore, only Convener Participants eligible to submit an EI Restructure Template will have that template for download/upload in the Participant Portal.

**Brian Footer:** Thank you. For our next question: In the quality assurance section of the application, there's a question about sanction, investigation, et cetera. We are applying as a Convener Participant with multiple downstream Episode Initiators. Is there a way to mass upload our responses for this question or do we need to input each sanction, investigation separately? For this, let's turn to Sacha Wolf.

**Sacha Wolf:** Thanks, Brian. We've received this question a couple of times. Each sanction, investigation, probation, corrective action plan or outstanding Medicare debt will need to be entered separately. If none of these issues apply to your organization, its practitioners and/or participating organizations, then be sure to mark the "Not Applicable" checkbox.

**Brian Footer:** Thank you. Our next question: As a current Participant, do I need to sign a new DRA form if I'm restructuring or adding EIs? For this, let's turn to Julia Byram.

**Julia Byram:** This is a good one. They're two data request and attestation forms. One is an applicant DRA and one is the Participant DRA. In order to receive baseline data and preliminary Target Prices, CMS needs to have a completed and signed applicant DRA on file. Current Participants within one of these two templates do not have to submit an applicant DRA because CMS already has one on file from the first application period in 2018. In late 2019, we will release the Participant DRA that all new applicants and current Participants who submitted an EI Restructure Template will need to submit. Current Participants who wish to continue participating as is, or who have submitted an EI Addition Template, will not be required to submit a Participant DRA.

**Brian Footer:** Thank you. Our next question: Are there any attachments to the application? For this, let's turn to Sacha Wolf.

**Sacha Wolf:** Thanks Brian. Yes, the BPCI Advanced application for Model Year 3 has one attachment, the Participating Organizations attachment. Applicants will download the attachment from the Application Portal, then complete and upload into the Application Portal. Convener applicants and non-Convener applicants who are Physician Group Practices will be required to submit this attachment.

**Brian Footer:** Thank you. Our next question: On the Participating Organizations attachment and EI Addition Template, there are fields for a physician's first name, last name and National Provider Identifier (NPI). Do we need to list all the physicians in the PGP EI or just one physician? For this, let's turn to Julia Byram.

**Julia Byram:** Thank you, Brian. On both the Participating Organizations attachment and EI Addition Template, we are only asking new applicants and current Participants to list one physician for the potential Physician Group Practice Episode Initiator. This means that each Episode Initiator in the Participating Organizations attachment or EI Addition Template should only be listed once.

**Brian Footer:** Thank you. Now we will move into questions addressing what happens after you submit an application or template. Our first question under this new section: How do I know that CMS has received my application? For this, let's turn to Sacha Wolf.

**Sacha Wolf:** Thanks, Brian. This is an important question. Upon successfully submitting your application in the Application Portal, you will receive an email notification. The email will come from the BPCI Advanced email and include the date and time your application was received, along with your application ID. If you have any questions about a submitted application, then please email the BPCI Advanced Inbox.

**Brian Footer:** Thank you. Our next question: I submitted an application and realized I need to change my response for a question. How do I edit a submitted application? For this, let's turn to Julia Byram.

**Julia Byram:** Thank you. Unfortunately, applications with the status of "Submitted" in the Application Portal cannot be edited. If you realize you made an error on your submitted application, then we recommend using the "clone" feature to clone the submitted application. You will then have the opportunity to edit any response on the "cloned" application before submitting it. Once you've submitted the "cloned" application, you can email the BPCI Advanced Inbox your notification to withdraw your original application submitted. Be sure to reference the correct Application ID that you wish to withdraw. Please refer to Page 10 of the Request for Application on how to withdraw an application.

**Brian Footer:** Thank you. Our next question: What happens to my application after June 24, 2019? Will I be able to access the Application Portal after the application window closes? For this, let's turn to Sacha Wolf.

**Sacha Wolf:** Thanks, Brian. After the application window closes, applicants will still be able to log in to the Application Portal and view both submitted and non-submitted applications. However, you will not be able to amend submitted applications or submit applications still in progress. Applicants will also have the ability to download submitted applications and DRAs for their own records.

**Brian Footer:** Thank you. Our next question: During the 2018 application cycle, applicants received historical claims data from 2014 to 2016. What is the year range for the historical data provided in this application cycle? For this question, let's turn to Julia Byram.

**Julia Byram:** This is an important question. Baseline data will be provided to both new applicants and current Participants. The baseline period used to calculate Target Prices from Model Year 3 is October 1, 2014, to September 30, 2018. Due to data restrictions, CMS can only provide new applicants and current Participants three years' worth of data. Therefore, new applicants and current Participants will receive baseline data for the period of October 1, 2015, to September 30, 2018. Applicants that do not complete the DRA section of the application will not be eligible to receive baseline data or preliminary Target Prices.

**Brian Footer:** Thank you. Our next question: Is there a minimum and a maximum number of Clinical Episodes I have to sign up for? For this, let's turn to Sacha Wolf.

**Sacha Wolf:** Thanks, Brian. This is a popular question. Participants must commit to be held accountable for at least one Clinical Episode per Episode Initiator on the Participant Profile. It's up to the Participant to determine how many Clinical Episodes they will participate in.

**Brian Footer:** Thank you. Now we'll discuss overarching questions about Model Year 3. For our first Model Year 3 question: What are the new Clinical Episodes in Model Year 3? For this, let's turn to Julia Byram.

**Julia Byram:** This is one of the most common questions we've received. In Model Year 3, CMS has added Bariatric Surgery, Inflammatory Bowel Disease, Seizures and Transcatheter Aortic Valve Replacement, or TAVR, to the list of inpatient Clinical Episodes. CMS is also allowing Total Knee Arthroplasty, or TKA, to trigger a major joint replacement of the lower extremity, also known as MJRLE, in both inpatient and outpatient settings. Additional information is forthcoming on how we intend to price the MJRLE episode.

**Brian Footer:** Thank you. Our next question: Will there be an adjustment to the 50% cap in Model Year 3 for BPCI Advanced? For this, let's turn to Sacha Wolf.

**Sacha Wolf:** Thanks, Brian. On May 1, 2019, we distributed an amendment to the BPCI Advanced Participation Agreement. One aspect of that amendment was the removal of the 50% cap on NPRA Shared Payments and Partner Distribution Payments. The Participation Agreement that will be distributed in September 2019 will incorporate language and policies from the amendment as well as new policies for participation for Model Year 3.

**Brian Footer:** Thank you. Our next question: We understand that currently CMS does not intend to have additional enrollment periods for future Model Years. That said, could you please clarify whether or not Participants will be able to drop Episode Initiators or Clinical Episodes from the Model in future Model Years? For this, let's turn to Julia Byram.

**Julia Byram:** Thank you, Brian. CMS does not intend to have additional application periods. The current Participants will not be able to add Episode Initiators new to the model and future Model Years. Those selected to participate in BPCI Advanced for Model Year 3 will be able to add or drop Clinical Episodes through the Participant Profile process for Model Year 4, which starts on January 1, 2021. As a reminder, BPCI Advanced is a voluntary model. The Participants can fully terminate the participation at any time with 90 days advanced written notice.

**Brian Footer:** Thank you. Ladies and gentlemen, thank you for attending the BPCI Advanced Model Overview Open Forum. If you have additional questions or your question was not addressed today, we encourage you to first visit the BPCI Advanced homepage at the address shown on this slide. As mentioned before, we have a number of helpful resources, and we'll continue to post new and updated material, such as Frequently Asked Question documents. If you need additional assistance, you can email the BPCI Advanced team at [bpciadvanced@cms.hhs.gov](mailto:bpciadvanced@cms.hhs.gov) and include your BPID or application ID.

Finally, please take a moment to complete a short nine-question survey that appears at the end of today's event. This survey helps the BPCI Advanced learning system team to improve and identify topics important to you. Thank you again for joining us today. We hope you found this open forum informative.

**Operator:** Ladies and gentlemen, that concludes today's presentation. Thank you for your participation, and feel free to now disconnect.