

## Virtual Group Election Process

As discussed in the CY 2018 Quality Payment Program final rule, if you're a solo practitioner or a group with 10 or fewer eligible clinicians who participates in the Merit-based Incentive Payment System (MIPS) as a virtual group, you'll need to engage in an election process. We intend to provide technical assistance, to the extent feasible and appropriate, to help you with the election process. Looking ahead to 2020, the third year of the Quality Payment Program, we hope we'll be able to offer you an electronic election process.

The election period for virtual groups to make an election is from October 11, 2017 to December 31, 2017. There is a two-stage election process for virtual groups:

- 1. Stage 1 (optional):** If you're a solo practitioner or part of a group with 10 or fewer eligible clinicians, you can choose to contact your local Quality Payment Program Technical Assistance organization. Your Technical Assistance organization can help you determine if you're eligible to join or form a virtual group before you:
  - Make any formal written agreements.
  - Send in your formal election registration.
  - Budget your resources for your virtual group.

Additional information on the available Technical Assistance options is listed below.

If you don't choose to contact your Technical Assistance representative directly, you can still contact the Quality Payment Program Service Center for questions on virtual group policies at 1-866-288-8292, TTY: 1-877-715-6222 or by e-mail at [QPP@cms.hhs.gov](mailto:QPP@cms.hhs.gov).

We'll check to see if your Taxpayer's Identification Number (TIN) is eligible to form or join a virtual group.

**For solo practitioners** - To be eligible to form or join a virtual group, solo practitioners have to:

- Be a practice of 1 eligible clinician who is also a MIPS eligible clinician.
- Not be a newly Medicare-enrolled MIPS eligible clinician.
- Not be a QP Participant.
- Not be a Partial QP not choosing to participate in MIPS.
- Not be excluded from MIPS based on the low-volume threshold exclusion at the individual level.
- Have at least one other solo practitioner or group of 10 or fewer eligible clinicians (including at least one MIPS eligible clinician) as part of the virtual group.

**For groups** - To be eligible to form or join a virtual group, groups have to:

- Have a TIN size that's not more than 10 eligible clinicians.
- Not be excluded from MIPS based on the low-volume threshold exclusion at the group level.



- Have at least one solo practitioner or other group of 10 or fewer eligible clinicians (including at least one MIPS eligible clinician) as part of the virtual group.

For groups that don't participate in stage 1 of the election process and don't ask for an eligibility determination, we'll see if they're eligible to be in a virtual group during stage 2 of the election process.

**2. Stage 2 (required):** The following elements are required as part of Stage 2 of the election process:

- **An agreement:** Each virtual group is required to have a formal written agreement between each solo practitioner and group that composes a virtual group members before election. The written formal agreement would not be submitted to CMS. A sample agreement has been provided in the Virtual Group toolkit.
- **Virtual group representative:** Name an official representative who is responsible for submitting an election on behalf of the virtual group to CMS via e-mail at [MIPS\\_VirtualGroups@cms.hhs.gov](mailto:MIPS_VirtualGroups@cms.hhs.gov).
- **Election submission deadline:** Each virtual group's official representative is responsible for submitting the virtual group's election via e-mail to [MIPS\\_VirtualGroups@cms.hhs.gov](mailto:MIPS_VirtualGroups@cms.hhs.gov) by **December 31, 2017**.
- **What needs to be included in a virtual group election?** A virtual group election needs to be made before the start of the 2018 performance period and must include at least the information about each TIN and NPI associated with the virtual group and the virtual group representative's contact information. For a TIN that is the Social Security Number (SSN) of an eligible clinician, only include the last six digits of the SSN when submitting an election to CMS. As part of the virtual group election that must be made before the start of the 2018 performance period, a virtual group's official representative needs to acknowledge that a formal written agreement has been established between each solo practitioner and group that composes a virtual group. Once the election is made, the virtual group representative has to contact the Quality Payment Program Service Center before the applicable submission period starts with any updates to the election information for the applicable performance period.
- **Group size/low-volume threshold determinations:** To determine group size and low-volume threshold requirements, we'll review claims data during 2-stage election process. While we understand that group sizes might change after virtual groups are approved by CMS, TIN size determinations that are made for virtual group eligibility during the 2-stage election process will remain valid for the whole performance year.

## Technical Assistance:

You can get help with the virtual group election process from the Quality Payment Program Technical Assistance organizations and the Quality Payment Program Service Center. Technical Assistance organizations can give you free help on all aspects of virtual groups, including TIN size eligibility determinations. We urge you to contact 1 of these 3 on-the-ground Technical Assistance networks for direct and immediate support:

- Small, Underserved, and Rural Support – help for eligible clinicians in small practices (15 or fewer clinicians), with priority for those in rural locations, health professional shortage areas (HPSAs), and medically underserved areas (MUAs). You can find the contact information for your local Small, Underserved, and Rural Support organization by visiting the Small and Rural Practices [webpage](#), or by contacting [QPPSURS@IMPAQINT.com](mailto:QPPSURS@IMPAQINT.com) to get connected.
- Quality Innovation Networks – Quality Improvement Organizations (QIN-QIOs) – help eligible clinicians in larger practices (more than 15 clinicians).
- Transforming Clinical Practice Initiative (TCPI) – helps eligible clinicians in both small and large practices interested in practice transformation and participating in an Alternative Payment Model (APM). Please note that there is a time and data commitment associated with participating in TCPI. Eligible clinicians who are interested in receiving support on virtual groups, or the Quality Payment Program in general, will need to enroll with a Practice Transformation Network first. For help getting started, contact [TCPI.ISCMail@us.ibm.com](mailto:TCPI.ISCMail@us.ibm.com).

To learn more or find direct contacts, use the [Technical Assistance Resource Guide](#).

For more about the virtual group election process, see the CY 2018 Quality Payment Program [final rule](#).