Virtual Group Election Process

As proposed in the CY 2018 Quality Payment Program proposed 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.

We intend to provide additional information to support virtual group formation once the CY 2018 Quality Payment Program final rule is published, which we anticipate will be in early November. If there are any changes made to any of the processes below based on the CY 2018 Quality Payment Program final rule, this information will be updated.

The election period for virtual groups to make an election is from **October 11, 2017 to December 1, 2017**. We've proposed a two-stage election process for virtual groups:

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 at 1-866-288-8292, TTY: 1-877-715-6222 or by email at qpp@cms.hhs.gov for support contacting Technical Assistance.

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 MIPS eligible
- Bill under a TIN with no other National Provider Identifier (NPI) billing under that TIN.

- Not be excluded from MIPS.

For groups - To be eligible to form or join a virtual group, groups have to:
- Be MIPS eligible
- Have a TIN size that's not more than 10 eligible clinicians.
- Not be excluded from MIPS.

Stage 2: 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.

We've proposed the following as part of Stage 2 of the election process:
- **A formal agreement:** Each virtual group would:

  o Be required to have a written formal agreement between each of the 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 email at MIPS_VirtualGroups@cms.hhs.gov.

- **Election submission deadline:** Each virtual group's official representative has to email the group's election to MIPS_VirtualGroups@cms.hhs.gov by the **December 1, 2017 before the 2018 performance period starts**.

- **What an election has to include**: Virtual group elections have to 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. The virtual group representative needs to acknowledge that a written formal agreement has been established between each member of the virtual group prior to election.   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 from the applicable performance period.

We'll provide you with more information about elections when we have it.

- **Group size/low-volume threshold determinations:** To determine group size and low-volume threshold requirements, we'll review claims data during 2 separate stages. We understand that group sizes might change after virtual groups are first approved to participate, but approvals will remain valid for the whole performance year even if the group size changes.

Technical Assistance

You can get help with the 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. 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 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.

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 proposed rule (82 FR 30027 through 30034).

Note: The proposed policies at the time of election could change once the final rule is published.

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