

FROM: The Centers for Medicare and Medicaid Services

Virtual Groups Election Period for MIPS 2019 Performance Year Now Open

If you're interested in forming a virtual group for the 2019 Merit-based Incentive Payment System (MIPS) performance year, the election period is now open. To form a virtual group, you must follow an election process and submit your election to CMS via e-mail by December 31, 2018.

Who Can Join a Virtual Group?

You can participate in a virtual group if you are either:

- A solo practitioner eligible for MIPS who exceeds the low-volume threshold; is not a newly Medicare-enrolled clinician; is not a Qualifying Participant (QP) in an Alternative Payment Model (APM); and is not a partial QP choosing not to participate in MIPS.
- A group that exceeds the low-volume threshold at the group level (i.e., clinicians under a single Taxpayer Identification Number (TIN) who collectively exceed the low-volume threshold); and has 10 or fewer clinicians (including at least one clinician who is MIPS eligible) that have reassigned their billing rights to the TIN.

Please note: TIN size is based on the total number of clinicians, or National Provider Identifiers (NPIs), billing under a TIN, which includes clinicians who are and are not MIPS eligible.

What is the Virtual Group Election Process?

There is a two-stage election process for forming a virtual group:

Stage 1 (optional):

- Contact your Quality Payment Program Technical Assistance organization for information regarding TIN size to help you determine if you meet the TIN size criteria to join or form a virtual group.

Stage 2 (required):

As part of Stage 2 of the election process, you must:

- Have a formal written agreement;
- Name an official virtual group representative;
- Submit the virtual group's election via e-mail to CMS at MIPS_VirtualGroups@cms.hhs.gov by December 31, 2018; and
- Determine if you meet the TIN size criteria and exceed the low-volume threshold

Download the 2019 Virtual Groups Toolkit to learn more about the election process and how to participate in MIPS as a virtual group for the 2019 performance year. The toolkit also contains sample templates for the submission e-mail and the virtual group formal agreement.

Why Join a Virtual Group?

Forming a virtual group gives you the opportunity to effectively and efficiently coordinate resources to achieve and meet requirements under each MIPS performance category, and potentially increase your

performance. You can choose the size and composition of your virtual group, and your virtual group may be formed based on location, specialty, or shared patient population.

2018 Virtual Groups - Participation in MIPS

For the 2018 performance year, only a couple of elections for virtual group formation were received as clinicians explored the benefits of virtual groups. Although only a few participated, we were able to gain valuable insights into important considerations for virtual groups. We recognize that the formation of a virtual group requires time and coordination among the small practices within a virtual group. To support the establishment and implementation of virtual groups, free, one-on-one technical assistance is available. We continue to create and provide useful resources and tools that are easily accessible and available for virtual groups. Currently, virtual groups are diligently operationalizing and preparing for the submission of data to meet MIPS requirements.

Need Help?

- Request [technical assistance](#) from on-the-ground organizations that can provide no cost support.
- Contact Quality Payment Program by
- Email: <mailto:QPP@cms.hhs.gov> or
- Phone: 1-866-288-8292/ TTY: 1-877-715-6222