

## 2021 Merit-based Incentive Payment System (MIPS) Performance Year Virtual Group Participation Overview Fact Sheet


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### How Can Clinicians Participate in MIPS?

There are several ways clinicians can participate in the Merit-based Incentive Payment System (MIPS) including:

- As an individual,
- As a group,
- As a **virtual group**, or
- As an Alternative Payment Model (APM) Entity

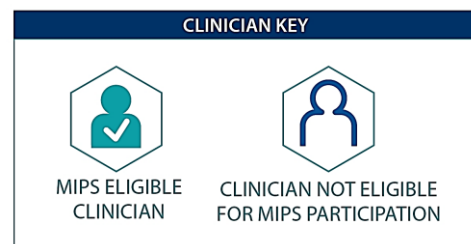
 **Check Your Eligibility** by contacting your local Technical Assistance organization (available for [small, underserved, and rural practices](#)).

### What Is a Virtual Group?

A virtual group is a combination of two or more Taxpayer Identification Numbers (TINs) assigned to:



- One or more solo practitioners (who are MIPS eligible), **or**
- One or more groups consisting of **10 or fewer clinicians** (including at least one MIPS eligible clinician), **or**
- Both – solo practitioners (who are MIPS eligible) and groups of 10 or fewer clinicians (including at least one MIPS eligible clinician) that elect to form a virtual group for a performance period for a year.

**Note:** A solo practitioner or group can **only participate in one virtual group** during the performance year.



## Who Can Participate in a Virtual Group?

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

 <p>A SOLO PRACTITIONER ELIGIBLE FOR MIPS</p>	 <p>A GROUP WITH 10 OR FEWER CLINICIANS—AT LEAST ONE ELIGIBLE FOR MIPS</p>
A solo practitioner who is included in MIPS:	A group that's included in MIPS:
<ul style="list-style-type: none"> <li>• Is a MIPS eligible clinician type,</li> <li>• Exceeds all 3 low-volume threshold elements,</li> <li>• Enrolled in Medicare as a clinician before the start of 2021,</li> <li>• Isn't a Qualifying APM Participant (QP), and</li> <li>• Isn't a Partial QP choosing not to participate in MIPS.</li> </ul>	<ul style="list-style-type: none"> <li>• Exceeds all 3 the low-volume threshold elements at the group level (i.e., the National Provider Identifiers (NPIs) within the TIN collectively meet or exceed at least one of the low-volume threshold elements), and</li> <li>• Has <b>10 or fewer clinicians</b> (including at least one clinician who is MIPS eligible) who have reassigned their billing rights to the TIN. <ul style="list-style-type: none"> <li>○ TIN size is based on the total number of NPIs billing under a TIN, which includes clinicians who are and aren't MIPS eligible.</li> </ul> </li> </ul> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>• If a group chooses to join a virtual group, <b>all</b> of the clinicians in the group are part of the virtual group.</li> <li>• A group that is part of a virtual group might have clinicians who are also participating in Advanced APMs. Participants in Advanced APMs may achieve QP status and will be excluded from MIPS.</li> </ul>
<p><b>Note:</b> When determining 2021 eligibility for virtual groups, we use eligibility data from the first 12-month segment (10/1/2019 – 9/30/2020) from the MIPS Determination Period.</p>	

### Where can I find out if I'm eligible to be in a virtual group?

Contact your local Technical Assistance organization, which is available for [small, underserved, and rural practices](#), for eligibility assistance.

## Opting-in and Virtual Groups

For any solo practitioner or group that meets or exceeds at least 1 of the 3 low-volume threshold elements AND is included in a **virtual group election**, the virtual group election serves as an **election to opt-in** to MIPS. Therefore, solo practitioners and groups that want to participate in MIPS as part of a virtual group due to meeting or exceeding at least 1 of the 3 low-volume threshold elements don't need to separately make an election to opt-in to MIPS.

If you're interested in forming or joining a virtual group, review the [2021 MIPS Virtual Group Election Process Guide](#) for more information on the election process.

## Why Should a Solo Practitioner or Group Participate in a Virtual Group?

### Virtual Groups Can Increase Performance Volume

Solo practitioners or groups with **10 or fewer clinicians** (including at least one MIPS eligible clinician) may not have enough cases to be reliably measured on their own, but if a solo practitioner or group forms a virtual group with another solo practitioner or group, together they could increase the performance volume in order to be reliably measured.

### Virtual Groups Allow Collaboration and Resource Sharing

If a solo practitioner and/or a group with **10 or fewer clinicians** participate in a virtual group, they could work together, share resources, and potentially increase performance under MIPS.

### Virtual Groups Are Flexible

Virtual groups have the flexibility to determine their own **makeup**. There are no requirements that restrict virtual group makeup to classifications or factors such as locality or specialty.




Also, virtual groups have the flexibility to determine their **own size**. There's no limit on the number of TINs that may form or join a virtual group. Any number of solo practitioners eligible for MIPS and/or groups with **10 or fewer clinicians** can be in a virtual group.

## How Do Special Statuses Apply to Virtual Groups?

Generally, policies that are established for groups apply to virtual groups. However, there are certain group policies that differ from policies that pertain to virtual groups, such as special status designations.

If a virtual group has a special status designation, the virtual group will qualify for reduced reporting requirements under certain MIPS performance categories.



The special status designations that are applicable to virtual groups are:

- Ambulatory Surgical Center (ASC)-based,
- Hospital-based,
- Health Provider Shortage Area (HPSA),
- Non-patient facing,
- Rural, and
- Small practice.

For more information on special status designations, please review [Special Statuses](#) on the [Quality Payment Program](#) website.

## How Do Virtual Groups Select Measures and Activities and Collect and Submit Data?

### Select Measures and Activities

Like groups, virtual groups will select measures and activities that are most applicable to their virtual group (all TINs part of the virtual group) and patient population.

- Virtual groups can choose from the same measures and improvement activities that are available to groups.
- Virtual groups must meet the same reporting requirements for each measure and activity as groups.

Once a virtual group finds measures and activities that work for their virtual group, the virtual group should prepare to collect data on those measures and activities by reviewing the specifications for each of the selected measures and activities.

#### Where can I learn more about measures and activities?

You can learn about measures and activities for the MIPS 2021 performance year, when available, by visiting [Explore Measures & Activities](#).

### Collect and Report Data

Virtual groups will collect and report their data at the **virtual group level**. Their performance will be assessed and scored at the virtual group level across all four MIPS performance categories (Quality, Cost, Improvement Activities, and Promoting Interoperability).

### Submit Data

Virtual groups can use the same submission types as groups. Virtual groups need to meet the requirements for a selected submission type.

#### What's a submission type?

A submission type is the way that data is submitted to CMS.

Submission Type	Description	Available Performance Categories
Medicare Part B Claims	Clinicians reporting as part of a virtual group designated as a small practice can add Quality Data Codes (QDCs) to their claims to denote measure performance.	Quality
CMS Web Interface	Registered virtual groups and their authorized representatives can report patient level performance data in a secure, internet-based application. <b>Note:</b> In the Calendar Year (CY) <a href="#">2021 Physician Fee Schedule Proposed Rule</a> , we are proposing to sunset the CMS Web Interface as a collection type beginning with the 2021 performance period. If this policy is finalized, the CMS Web Interface would not be an option for the 2021 performance period.	Quality
Log-in and Attest	Virtual groups and their authorized representatives can sign in to <a href="http://gpp.cms.gov">gpp.cms.gov</a> and manually report Promoting Interoperability measures and/or Improvement Activities.	Improvement Activities, Promoting Interoperability
Log-in and Upload	Virtual groups, their authorized representatives, and third-party intermediaries* can sign in to <a href="http://gpp.cms.gov">gpp.cms.gov</a> and upload a file in a CMS-approved format.	Quality, Improvement Activities, Promoting Interoperability
Direct	Authorized third-party intermediaries (such as Qualified Clinical Data Registries (QCDRs) and Qualified Registries) can perform a direct submission, transmitting data through a computer-to-computer interaction, such as an application programming interface (API).	Quality, Improvement Activities, Promoting Interoperability
<b>Note:</b> There's no data submission requirements for the Cost performance category. We use administrative claims data to calculate a score for the Cost performance category on behalf of all clinicians in the virtual group.		

\*A third-party intermediary is an entity that collects and submits data on behalf of MIPS eligible clinicians. For more information, review the CMS-approved QCDRs and CMS-approved Qualified Registries on the Quality Payment Program [Resource Library](#).

**IMPORTANT:** Each virtual group will need to **aggregate its data across the virtual group** (all TINs within the virtual group) for each MIPS performance category. We will not aggregate virtual group data; each virtual group is responsible for aggregating data across all solo practitioners and/or groups within the virtual group. MIPS data may be submitted by third-party intermediaries on behalf of a virtual group.



## How Is the MIPS Final Score Determined for a Virtual Group?

A virtual group's performance is assessed and scored at the **virtual group level** across all 4 MIPS performance categories. A virtual group will receive a score for each MIPS performance category and a MIPS Final Score based on the sum of each MIPS performance category score. Each clinician in a virtual group, as identified by a TIN/NPI combination, will receive a MIPS Final Score based on the virtual group's performance. Only MIPS eligible clinicians will receive a MIPS payment adjustment based on the virtual group's MIPS Final Score (clinicians in a virtual group that: are not MIPS eligible clinician types, are newly Medicare-enrolled clinicians, are QPs, or are Partial QPs choosing not to participate in MIPS will not receive a MIPS payment adjustment).

## How Are Clinicians in a Virtual Group and an APM Scored?

During the performance year, clinicians (NPIs) in a group (TIN) that are part of a virtual group may also be part of a MIPS APM or Advanced APM. The TIN, as part of the virtual group, must submit MIPS performance data for all clinicians associated with the TIN, including those in a MIPS APM or Advanced APM. This assures that all clinicians associated with a virtual group's TINs are being measured under MIPS.

- If a clinician participating in both a **virtual group** and an [Advanced APM](#) is a **QP**, the eligible clinician will be assessed under MIPS as part of the virtual group. However, the clinician will be **excluded** from the MIPS payment adjustment due to their QP status.
- A MIPS eligible clinician who participates in both a **virtual group** and a [MIPS APM](#) will be assessed under MIPS as part of the virtual group and may also be assessed as part of an APM Entity. Note: In the CY [2021 Physician Fee Schedule Proposed Rule](#), we are proposing that such MIPS eligible clinician would **receive** a MIPS payment adjustment based on the virtual group score.

## How Are MIPS Payment Adjustments Applied for Virtual Groups?

MIPS payment adjustments are applied as follows:

Virtual Group Member	Included in Virtual Group Performance Data?	MIPS Final Score	MIPS Payment Adjustment
Clinician isn't a MIPS eligible clinician	Yes	Yes, based on the virtual group score.	No
Clinician is a MIPS eligible clinician	Yes	Yes, based on the virtual group score.	Yes

Virtual Group Member	Included in Virtual Group Performance Data?	MIPS Final Score	MIPS Payment Adjustment
Clinician is a MIPS APM participant	Yes	Yes, based on the virtual group score.	Yes, if clinician is a Partial QP and chooses to participate in MIPS. No, if clinician is a Partial QP and chooses not to participate in MIPS. Note: In the <a href="#">2021 Physician Fee Schedule Proposed Rule</a> , we are proposing that such clinicians in a MIPS APM would receive a MIPS payment adjustment.
Clinician has QP status	Yes	Yes, based on the virtual group score.	No, excluded due to QP status.

## How Do We Form a Virtual Group if We Are Interested?

There's a **two-step election process** for solo practitioners and groups with 10 or fewer clinicians (including at least one MIPS eligible clinician) that want to form a virtual group. To participate in MIPS as a virtual group for the 2021 performance year, a virtual group election must be made before the start of the performance year and **can't change during the performance year**.

For more information on virtual group elections, visit the [2021 MIPS Virtual Group Election Process Guide](#).

For the 2021 MIPS performance year, the virtual group election period begins on October 1, 2020, and ends on December 31, 2020 (11:59 p.m. Eastern Time).

## Where Can I Get Help if I Want to Participate in a Virtual Group?

For additional information regarding the two-step virtual group election process, please review the [2021 MIPS Virtual Group Election Process Guide](#) in the [Resource Library](#) on the [Quality Payment Program](#) website.

We offer Technical Assistance to small, underserved, and rural practices that is provided by professional and experienced providers who are available to assist you at no cost. Contact your local Technical Assistance organization for questions regarding virtual groups. Locate your local Technical Assistance organization on the [Support for Small, Underserved, and Rural Practices webpage](#).

## Questions?

Contact the Quality Payment Program at 1-866-288-8292, Monday through Friday, 8 a.m. – 8 p.m. ET or by e-mail at: [QPP@cms.hhs.gov](mailto:QPP@cms.hhs.gov). Customers who are hearing impaired can dial 711 to be connected to a TRS Communications Assistant.