

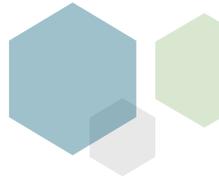


Quality Payment PROGRAM

MERIT-BASED INCENTIVE PAYMENT SYSTEM (MIPS)

Virtual Group Election Process
Guide for the 2020
Performance Period



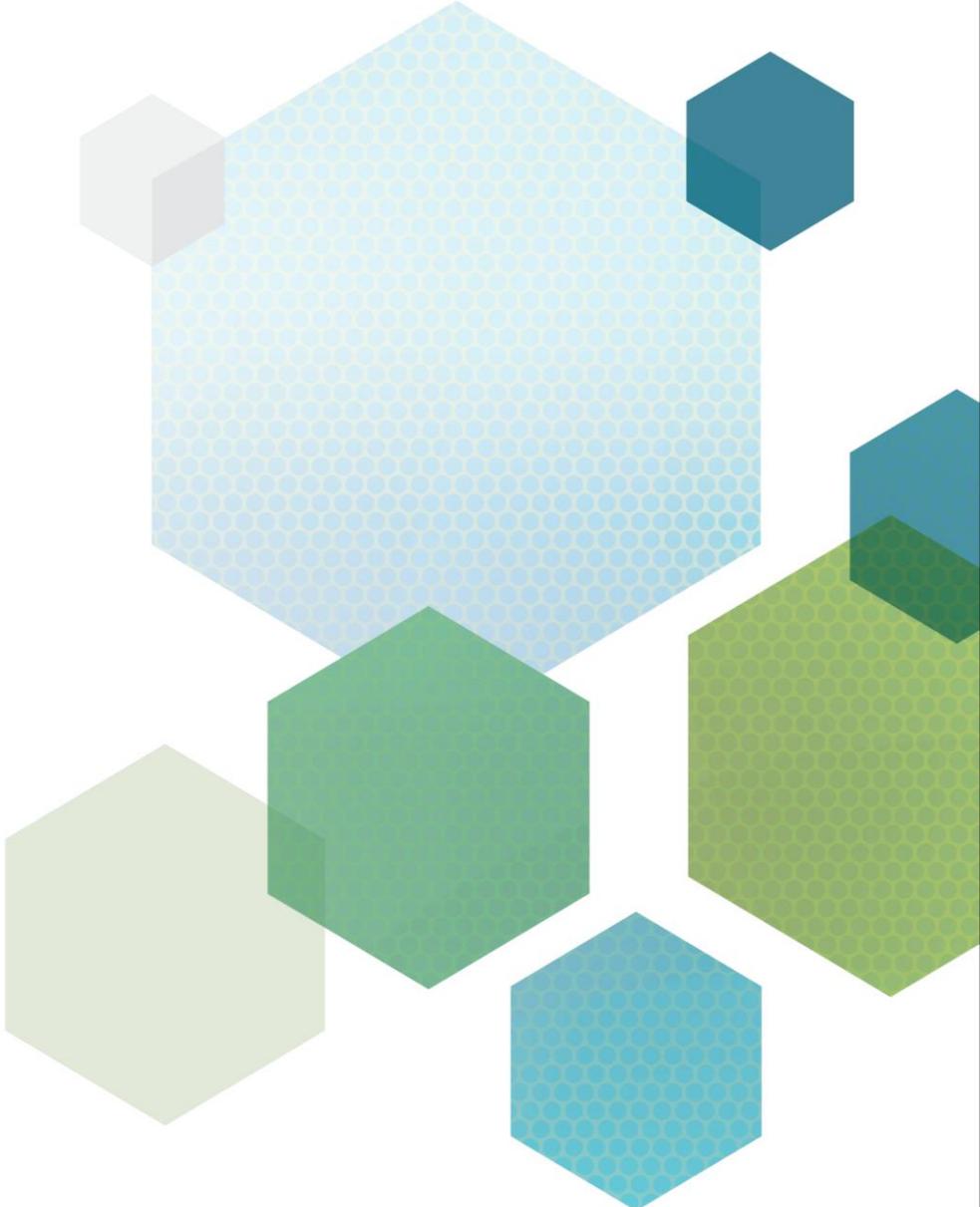


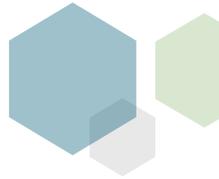
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HOW TO USE
THIS GUIDE





Please Note: This guide was prepared for informational purposes only and is not intended to grant rights or impose obligations. The information provided is only intended to be a general summary. It is not intended to take the place of the written law, including the regulations. We encourage readers to review the specific statutes, regulations, and other interpretive materials for a full and accurate statement of their contents.

This guide helps solo practitioners and/or groups consisting of 10 or fewer clinicians (including at least 1 MIPS eligible clinician) who are interested in forming a virtual group for the 2020 performance period through the election process.

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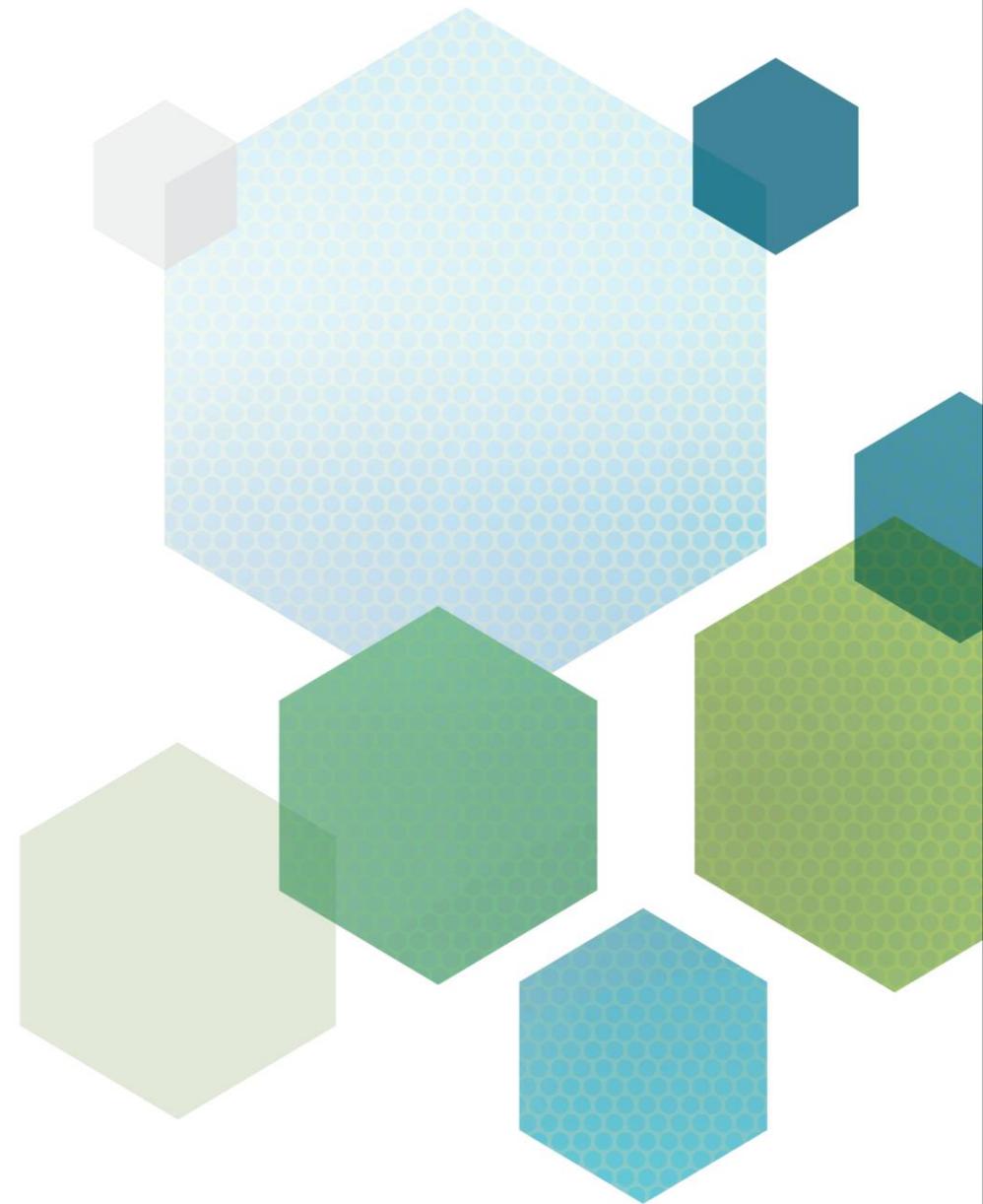
You can also click on the icon on the bottom left to go back to the table of contents.

Hyperlinks

Hyperlinks to the [QPP website](#) are included throughout the guide to direct the reader to more information and resources.



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IMPORTANT DATES



What Dates Should Solo Practitioners and Groups Interested in Forming a Virtual Group Be Aware Of?

October 2019

IMPORTANT: The virtual group election period opens on October 1, 2019. You may submit your virtual group election at this time.

Check if your group meets the TIN size requirements (10 or fewer clinicians) to participate in MIPS as part of a virtual group by contacting your local [technical assistance](#) provider for small, underserved, and rural practices.

December 2019

IMPORTANT: The virtual group election period ends on December 31, 2019.

You have until 11:59 p.m. ET to **submit, revise, or retract** your virtual group election on this date. After this date, you cannot make changes to the election.

January 2020

The 2020 Performance Year begins on January 1, 2020.

Start collecting data for the virtual group.



What Dates Should Solo Practitioners and Groups Interested in Forming a Virtual Group Be Aware Of?

April 2020

Registration for CMS Web Interface to report data for the Quality performance category and/or administer the Consumer Assessment of Healthcare Providers and Systems (CAHPS) for MIPS Survey opens on April 1, 2020.

June 2020

Registration for CMS Web Interface to report data for the Quality performance category and/or administer the CAHPS for MIPS Survey ends on June 30, 2020.

December 2020

Final MIPS eligibility for the 2020 performance period is released from the two 12-month segments of the MIPS determination period.

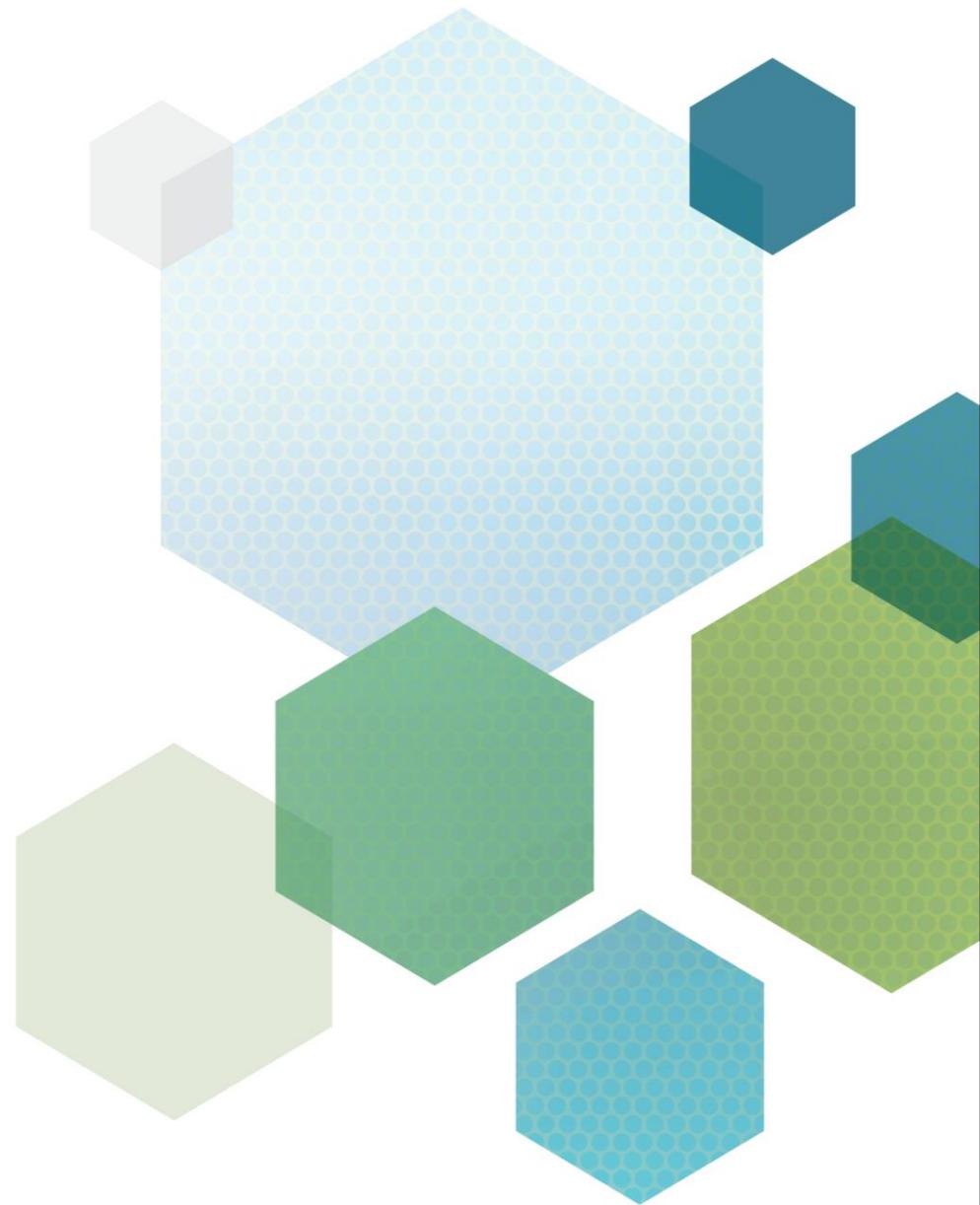
The 2020 Performance Year ends on December 31, 2020.

IMPORTANT: If there are any changes to the makeup of the virtual group (i.e. if NPIs have left or joined during the performance year), the virtual group's official representative must contact the [Quality Payment Program](#) regarding these changes by this date.





QUICK FACTS





Participation

- A virtual group is 1 of the 3 ways clinicians can participate in MIPS.
- A virtual group is a combination of 2 or more Taxpayer Identification Numbers (TINs) assigned to 1 or more solo practitioners and/or groups consisting of **10 or fewer clinicians** (including at least 1 MIPS eligible clinician).
- Virtual group eligibility for the 2020 performance period is based on data from the first 12-month segment (October 1, 2018 – September 30, 2019) of the MIPS determination period.
 - Check if you're MIPS eligible by contacting your local [technical assistance](#) provider for small, underserved, and rural practices for assistance.
- 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 will serve as their election to opt-in to MIPS.

Questions about participating in a virtual group?

Check out the [2020 Virtual Group Participation Overview Fact Sheet](#).

Selecting Measures and Activities, Collection, and Submitting Data

- A virtual group can choose from the same measures and activities and use the same submission types as groups.
- A virtual group will collect and report data at the virtual group level.
 - Each virtual group must aggregate its data across the virtual group (all the TINs within the virtual group) for each performance category.



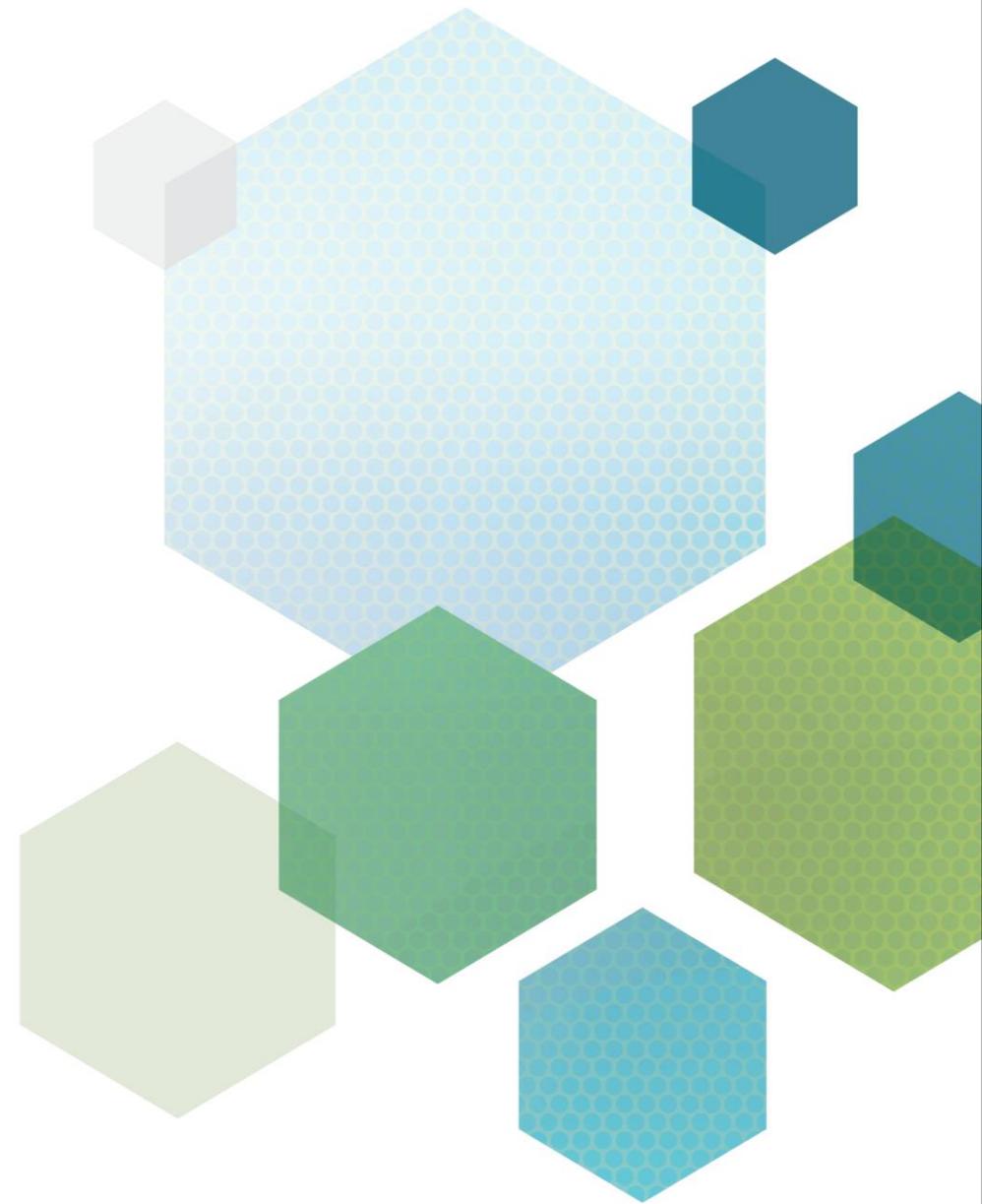
Virtual Group Election Process

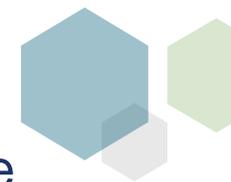
- The virtual group election period takes place **October 1, 2019 to December 31, 2019** and is a 2-step process.
- To participate in MIPS as a virtual group for the 2020 performance period, a virtual group election **must be made before the 2020 performance period starts**. This means that a virtual group election must be made by 11:59 p.m. Eastern Time (ET) on December 31, 2019.
 - After an election is made, a virtual group has until December 31, 2019 to **revise or retract** their virtual group election (a virtual group election cannot be revised or retracted once the performance period starts).
 - A virtual group must identify an official representative and establish a formal written agreement between each solo practitioner and/or group that composes the virtual group for a minimum of 1 performance period.
- An approved virtual group election will remain valid for the entire performance period, even if the virtual group's composition changes during the performance period.
 - If the virtual group experiences a **change** (like a composition change for example) during the performance period, the virtual group's official representative must **notify** the [Quality Payment Program](#) of these changes before the submission period opens.





ELECTION PROCESS





What Is the Election Process Like for Solo Practitioners and Groups Who Are Interested in Forming a Virtual Group?

The virtual group election is a **2-step process** for solo practitioners and groups with 10 or fewer clinicians (including at least 1 MIPS eligible clinician) who want to form a virtual group. Virtual groups can submit an election during the election period from **October 1, 2019 to December 31, 2019**.

To participate in MIPS as a virtual group for the 2020 performance period, a virtual group election must be made before the start of the performance period, and the election can't be revised during the performance period.

If a virtual group needs to **revise** to their election or would like to **retract** their election, this must be done before the election period ends on December 31, 2019 at 11:59 p.m. ET.

The Virtual Group Election Process for the 2020 Performance Period

Step 1 (Optional)

Step 2 (Required)



Virtual Group Election Period Begins on October 1, 2019



Verify TIN Eligibility and Criteria is Met
Prepare for your election by verifying TIN eligibility and that your TIN meets the virtual group criteria.



Identify Official Representative
Identify your virtual group's official representative.



Formal Agreement
Establish formal written agreements with each solo practitioner and group in the virtual group.



Submit Virtual Group Election
Your official representative submits the virtual group election via email before the end of the election period.



Virtual Group Election Period Ends on December 31, 2019



Virtual Group Election is Approved or Denied
A decision about your election is made after your election is submitted.
Note: Decisions are made on a rolling basis as elections are submitted during and after the election period based on when the election was received.



Notify CMS of Virtual Group Updates
Contact CMS regarding any changes to your virtual group information or composition during the election period and/or performance period.

Step 1: Where Should Solo Practitioners and Groups Interested in Joining or Forming a Virtual Group Start?

The first step of the virtual group election process is **optional** for solo practitioners and groups with 10 or fewer clinicians (with at least 1 being a MIPS eligible clinician type) who are interested in joining or forming a virtual group.

The first optional step is to check **eligibility** for the Taxpayer Identification Number (TIN) and determine if the TIN **meets the criteria** to join or form a virtual group.

Although optional, we **strongly encourage** that those interested in forming a virtual group complete this step to help determine if they **meet the criteria** to join or form a virtual group.

The Virtual Group Election Process for the 2020 Performance Period

Step 1 (Optional)



Virtual Group Election Period Begins on October 1, 2019



Verify TIN Eligibility and Criteria is Met
Prepare for your election by verifying TIN eligibility and that your TIN meets the virtual group criteria.

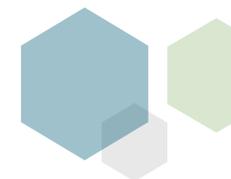
Step 1: How Can Solo Practitioners and Groups Check Their Eligibility to Determine If They Meet the Virtual Group Criteria?

You can contact your **local technical assistance provider**, who can help you determine if a TIN meets the TIN size criteria to join or form a virtual group for the 2020 performance period. Direct [technical assistance](#) providers are professional and experienced providers that are here to offer small, rural, and underserved practices direct personal assistance with the Quality Payment Program at no cost.

Once you determine that a TIN meets the size criteria, you can move forward onto the second step of the election process that's **required** to join or form a virtual group.

Check out the [2020 Virtual Group Participation Overview Fact Sheet](#) for information on participation criteria





Step 2: What Does the Second Step of the Virtual Group Election Process Involve?

The second step of the virtual group election process is **required** for solo practitioners and groups with 10 or fewer clinicians (with at least 1 being a MIPS eligible clinician) who are interested in forming or joining a virtual group.

During the **second required step**, you will:

- Prepare for an election (i.e. budget your resources for the virtual group);
- Identify your official representative;
- Establish formal written agreements; and
- Submit the virtual group election via email at MIPS_VirtualGroups@cms.hhs.gov.

Remember: The virtual group election period is **October 1, 2019 to December 31, 2019**.

The Virtual Group Election Process for the 2020 Performance Period

Step 2 (Required)



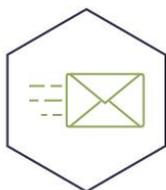
Identify Official Representative

Identify your virtual group's official representative.



Formal Agreement

Establish formal written agreements with each solo practitioner and group in the virtual group.



Submit Virtual Group Election

Your official representative submits the virtual group election via email before the end of the election period.



Virtual Group Election Period Ends on December 31, 2019



Virtual Group Election is Approved or Denied

A decision about your election is made after your election is submitted.

Note: Decisions are made on a rolling basis as elections are submitted during and after the election period based on when the election was received.



Notify CMS of Virtual Group Updates

Contact CMS regarding any changes to your virtual group information or composition during the election period and/or performance period.

Step 2: What Does the Second Step of the Virtual Group Election Process Involve?

The following components are part of the second required step of the election process:



Identify Official Representative

Identify your official virtual group representative

The official virtual group representative will be responsible for submitting the virtual group's election.



Formal Agreement

Have a formal written agreement

Each virtual group is required to have a formal written agreement between each solo practitioner and group that composes the virtual group before an election is submitted.

Note: Virtual groups do not need to submit their formal written agreement to CMS as part of a virtual group election, but virtual groups will need to acknowledge in their election that a formal written agreement has been established.



Submit Virtual Group Election

Submit the virtual group's selection by the election submission deadline

Each virtual group's official representative is responsible for submitting the virtual group's election via email to CMS at MIPS_VirtualGroups@cms.hhs.gov during the election period: October 1, 2019 to December 31, 2019.

Note: The virtual group election period ends at 11:59 p.m. ET on December 31st.

Step 2: What Does the Second Step of the Virtual Group Election Process Involve?

The following components are part of the second required step of the election process:



Virtual Group Election is Approved or Denied

CMS makes determination on virtual group election

Each virtual group is required to have a formal written agreement between each solo practitioner and group that composes the virtual group before an election is submitted.

Note: Virtual groups do not need to submit their formal written agreement to CMS as part of a virtual group election, but virtual groups will need to acknowledge in their election that a formal written agreement has been established.



Notify CMS of Virtual Group Updates

Notify CMS of changes to virtual group composition or information

If an **NPI joins** or **leaves** the TIN, or a **change** is made to a TIN that impacts the agreement (i.e. a legal business name change), a virtual group must update the agreement, and a virtual group's official representative must notify the Quality Payment Program of these changes.

If these changes occurred during:

- **The Virtual Group Election Period:** Contact the [Quality Payment Program](#) to revise your election before the election period ends on December 31, 2019.
- **The 2020 Performance Period:** Contact the [Quality Payment Program](#) to notify us of these changes before the submission period opens.

To learn more about notifying us of changes, check out the [next steps](#) section.

Step 2: What Needs to Be Included in a Virtual Group Agreement?

A virtual group arrangement must be established in a **formal written agreement** between each solo practitioner and group that composes a virtual group.

- A virtual group agreement must include the **9 required elements** listed in the [virtual group checklist](#) available in the Appendix for your reference.
- A [sample agreement template](#) is available in the Appendix for you to reference as a guide when establishing your agreements.

The parties that must form a virtual group agreement are the TINs that make up the virtual group. The written virtual group agreement must identify all clinicians who bill under the TIN of a group that is in the virtual group and the agreement applies for at least 1 performance period.

The parties that must form a virtual group agreement are the TINs that make up the virtual group. The written virtual group agreement must identify all clinicians who bill under the TIN of a group that is in the virtual group and the agreement applies for at least 1 performance period.

Need to update your virtual group submission information?

More information on how to update your virtual group's submission information is available in the [next steps section](#) of this guide.



Step 2: What Information Needs to Be Included in a Virtual Group Election?

The virtual group election **must include** the following:



Identification of the **official virtual group representative**.

- Provide the representative's name, TIN/practice affiliation, and contact information.



Identification and information on each Taxpayer Identification Number (TIN) and National Provider Identifier (NPI) associated with the virtual group.

- Provide the TIN and legal business name, as recorded in the [Provider Enrollment, Chain, and Ownership System \(PECOS\)](#), for each TIN.
 - For a TIN that is the Social Security Number (SSN) of a clinician, **only** include the **last 6 digits** of the SSN when you are submitting an election.
- Include the name and NPI of the clinicians associated with each TIN.



Acknowledgement that a **formal written agreement** has been established between each solo practitioner and group that composes a virtual group.

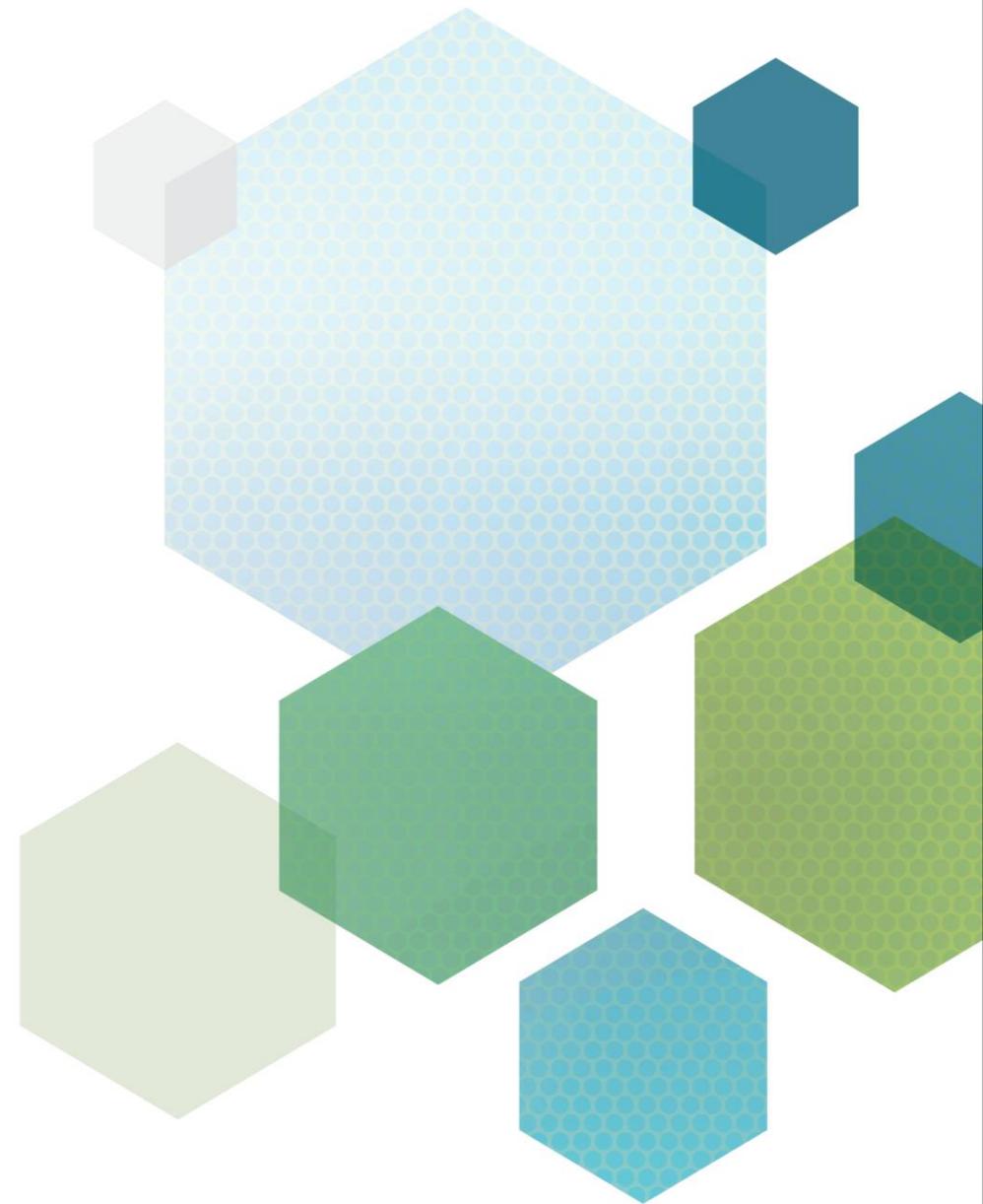
- **Note:** Formal written agreements do **NOT** need to be submitted to CMS as part of the group election.

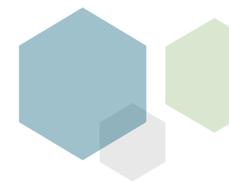
A [sample election](#) is available in the Appendix for you to reference when establishing your election.





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NEXT STEPS





How Does a Virtual Group Update the Virtual Group Information Included in Their Election If Something Has Changed During the Election Period?

If there are any changes to the information that was included in your election, such as a **NPI joins or leaves the TIN** or a **change is made to a TIN that impacts the agreement** (i.e. a legal business name change, virtual group composition, etc.), your virtual group's official representative must contact the [Quality Payment Program](#) regarding these changes and revise your election before the election period ends on December 31, 2019 at 11:59 p.m. ET.

A virtual group can **revise or retract** their election until the end of the election period on December 31st. After the election period closes, your group **cannot** revise or retract your election and your election will remain valid for the entire performance period.

What Does a Virtual Group Do If Something Has Changed to Their Virtual Group After the Election Period Closes?

If there are any changes to your virtual group during the 2020 performance period (January 1, 2020 to December 31, 2020), such as a **NPI joins or leaves the TIN**, or a **change is made to a TIN that impacts the agreement** (i.e. a legal business name change, virtual group composition, etc.), your virtual group's official representative must contact the [Quality Payment Program](#) and **notify us** of the changes to your virtual group before the **submission period opens**.

Note: An approved virtual group election will remain valid for the entire performance period, even if the virtual group's composition changes during the performance period. For example, if a TIN within a virtual group has 10 NPIs at the start of the performance period, but a NPI joins the TIN during the performance period, such TIN would continue to be part of the virtual group even though it has 11 NPIs associated with the TIN. While the clinician composition of TINs that are part of a virtual group may change following an election, virtual groups cannot add or remove TINs from the virtual group during the performance period.

To notify us of updates to your virtual group election, contact the Quality Payment Program at 1-866-288-8292 (TTY 1-877-75-6222) Monday through Friday, 8:00 a.m. – 8:00 p.m. Eastern Time or via email at gpp@cms.hhs.gov.





How Does CMS Evaluate a Virtual Group Election for the 2020 Performance Period?

After we receive a virtual group election via email, we carefully review the virtual group election along with claims data from the first 12-month segment (October 1, 2018 – September 30, 2019) of the MIPS determination period to determine eligibility of TINs identified in the virtual group election for the 2020 performance period.

Eligibility determinations are made to identify solo practitioners who are MIPS eligible and groups that meet the TIN size and low-volume threshold criteria.

How Are Virtual Groups Notified If Their Virtual Group Election Was Approved?

After we review a virtual group's election and determine that the virtual group meets the virtual group eligibility criteria, the virtual group is **approved** to participate in the 2020 MIPS performance period as an official virtual group.

We will **notify** the virtual group's official representative of their official virtual group status and issue a virtual group identifier (Virtual Group ID).

Each virtual group is assigned a unique Virtual Group ID (VG - XXXXXX), made up of:



Note: An approved virtual group election will remain valid for the entire performance period, even if the virtual group's composition changes during the performance period.

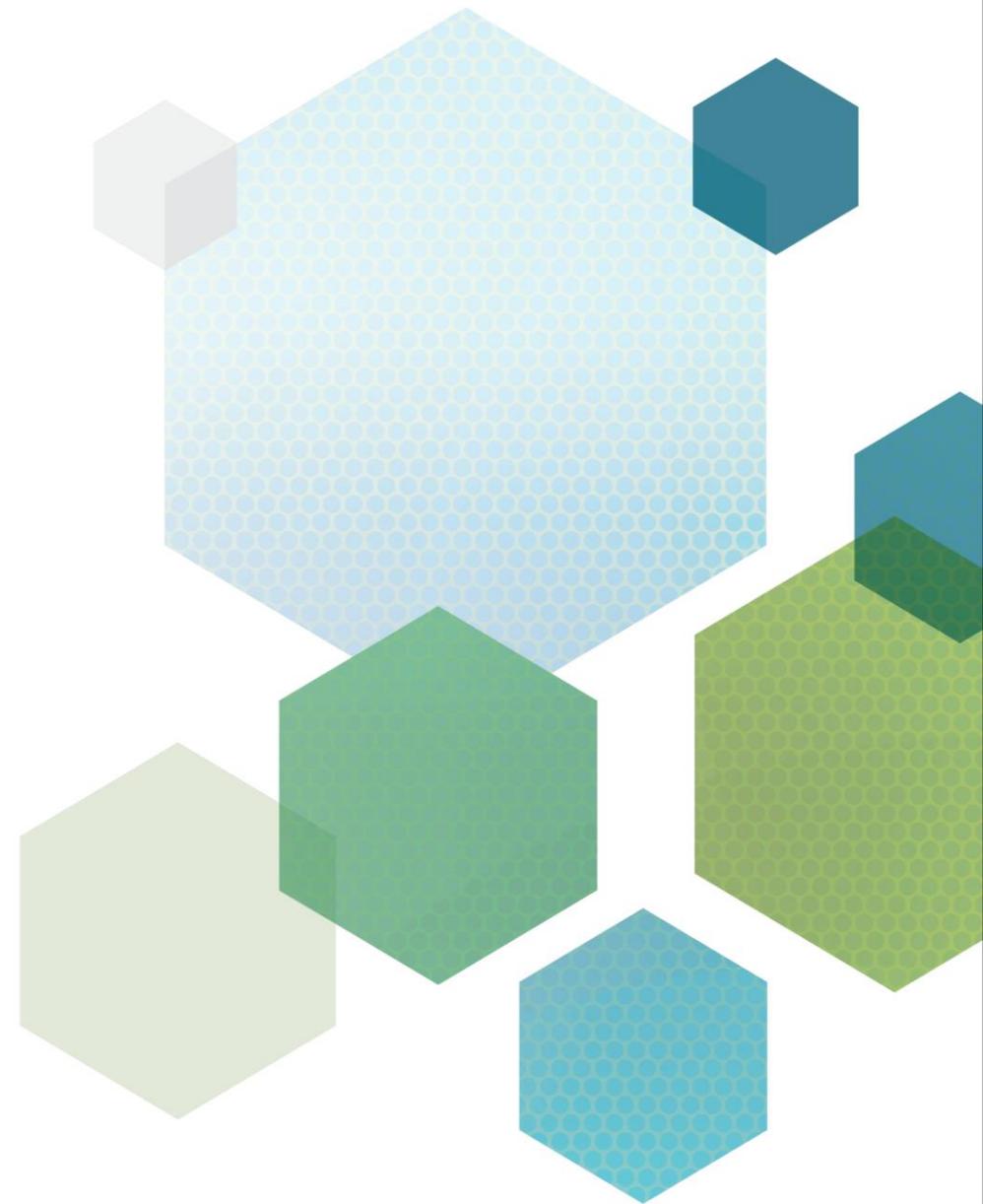
Virtual groups using a third-party intermediary (i.e. qualified registries, QCDRs, and/or EHRs) to submit their performance data will need to provide their Virtual Group ID to the third-party intermediary.

- The third-party intermediary will include the Virtual Group ID alone (VG - XXXXXX) in the file submissions.
- Virtual groups that elect to participate in MIPS via the CMS Web Interface and/or administer the CAHPS for MIPS survey will need to register and provide their Virtual Group ID (VG - XXXXXX) during registration.



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ADDITIONAL RESOURCES & HOW TO GET HELP



Additional Resources

The [Quality Payment Program website](#) provides additional information and resources to help you actively participate in QPP. In the [Resource Library](#), you will find the [2020 MIPS Performance Period Virtual Group Participation Overview Fact Sheet](#) as well as many other fact sheets, guides, and FAQs we have created about the program. We also encourage you to check out our upcoming and past webinars in the [Webinar Library](#).

Click on the topic you're interested in exploring from the resources below to be brought to the listed resource.

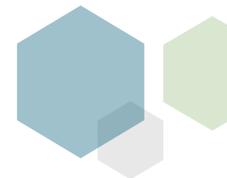
The collage includes several key pages from the Quality Payment Program website:

- Upcoming Webinars and Programs:** A page listing upcoming webinars, including a 2019 webinar on Advanced Alternative Payment Models (APMs).
- Resource Library:** A central hub for various resources, categorized into General Resources (e.g., 2019 Group Participation Guide), Regulatory Resources (e.g., 2019 Quality Payment Program Final Rule), and a Full Resource Library.
- 2019 Promoting Interoperability Performance Category Overview:** A page providing an overview of the Promoting Interoperability performance category for the 2019 MIPS year.
- Register for CMS Web Interface or CAHPS for MIPS Survey:** A banner for the 2019 MIPS survey registration, noting that the submission window has closed.
- 2020 Merit-based Incentive Payment System Performance Period Virtual Group Participation Overview Fact Sheet:** A detailed fact sheet explaining virtual group participation, including eligibility criteria (individual, group, or virtual group) and a 'CLINICIAN KEY' for MIPS-eligible and non-eligible clinician types.

Not finding what you're looking for?

Subscribe to updates at the bottom of the [QPP website](#) for notifications when new information is released or contact us using the contact information at the bottom of the page for help with your questions.





How to Get Help

We offer a range of support to help you or your practice actively participate and succeed in the Quality Payment Program.

Request Direct Technical Assistance



This help comes from professional and experienced on-the-ground organizations that are able to assist you at no cost.

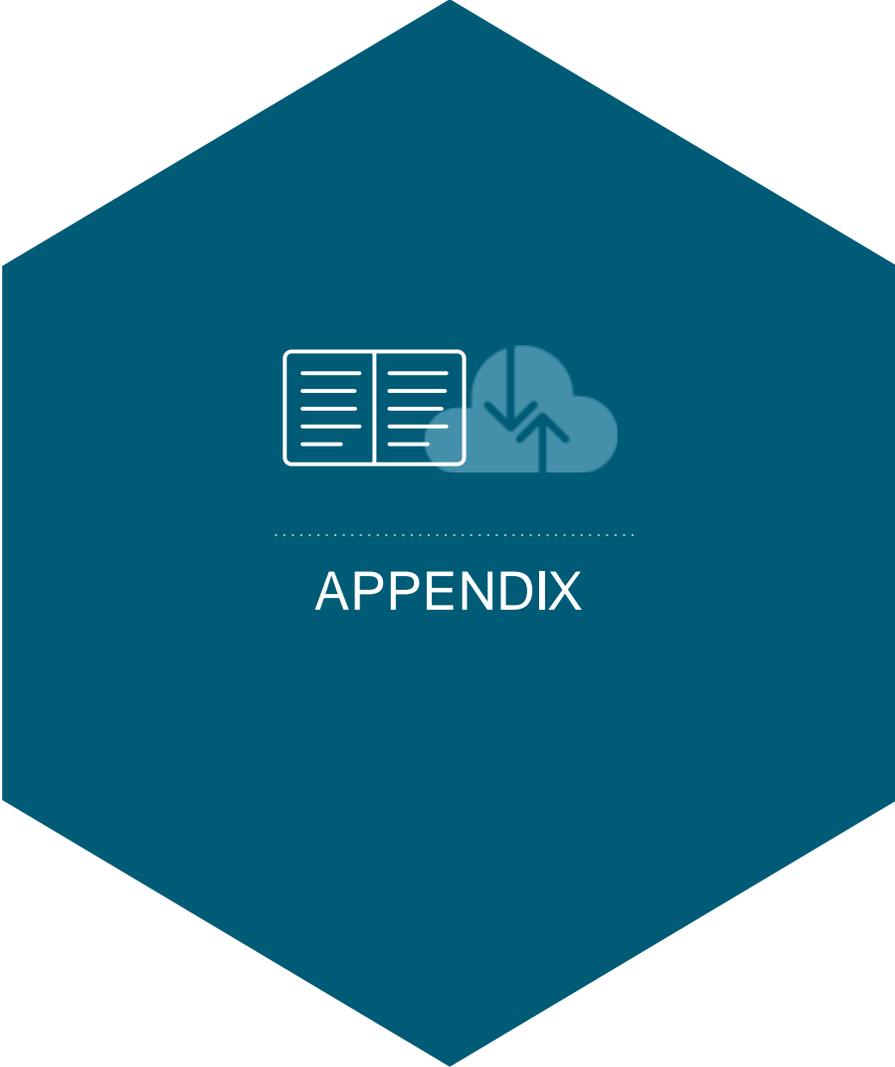
Get Help From CMS

 [Send Us Your Questions](#) 

 1-866-288-8292

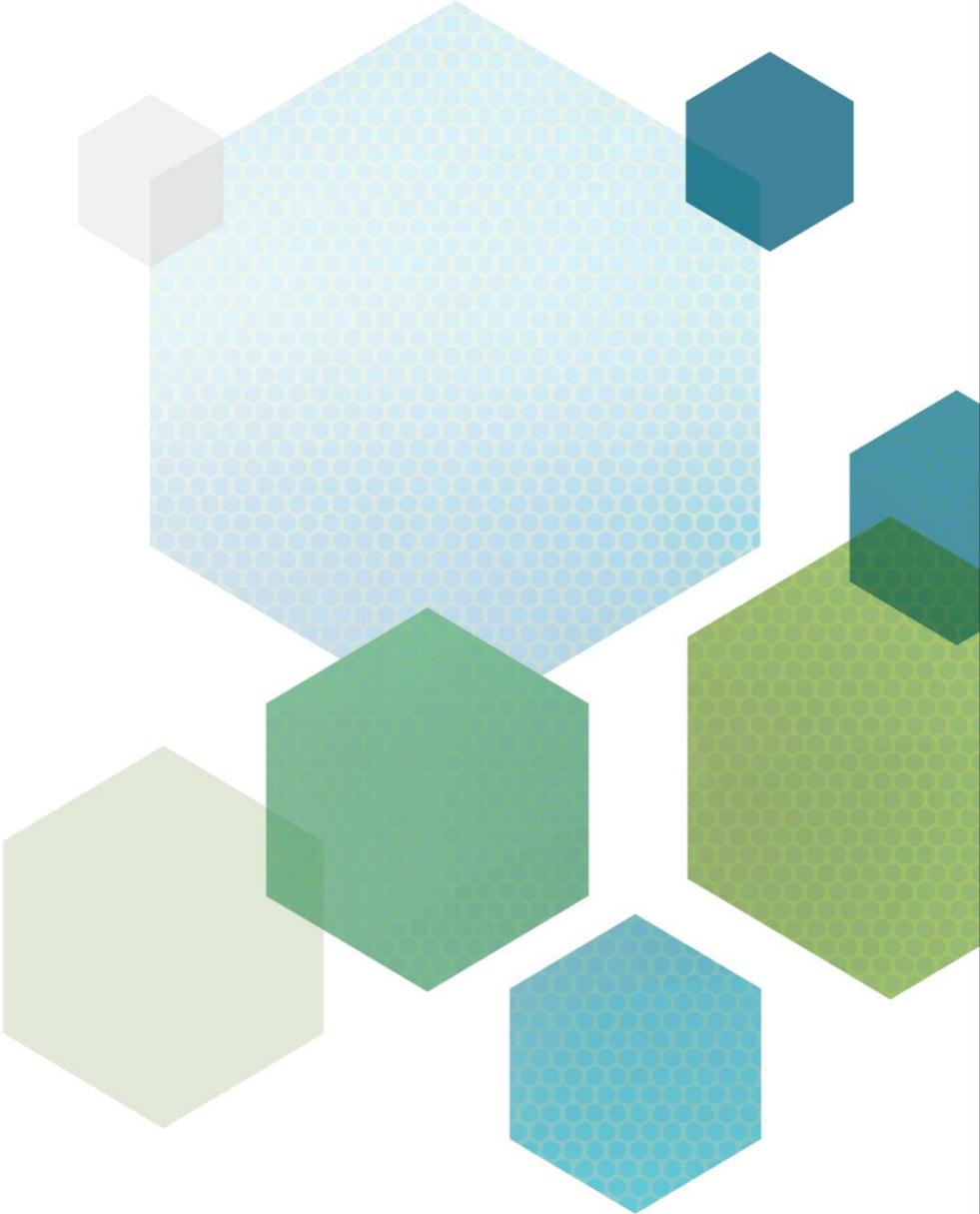
 TTY: 1-877-715-6222

The Quality Payment Program can also be reached at 866-288-8292 (TTY 877-715-6222), Monday through Friday, 8:00 am – 8:00 pm Eastern Time or via e-mail at QPP@cms.hhs.gov.



APPENDIX

The graphic features a teal hexagon containing a white icon of a document with a cloud and arrows, and the word 'APPENDIX' in white capital letters below it.



Forming a Virtual Group Prep Questions

*Solo practitioners and groups interested in forming a virtual group are encouraged to **consider the following items** prior to submitting a virtual group election:*

- How would the virtual group meet the requirements for each performance category?
- Are there operational elements that the virtual group would need to address in order to meet the reporting requirements for each performance category?
- Which measures and activities would the virtual group report?
- How would the virtual group collect and aggregate its data across the TINs within the virtual group?
- Which submission type(s) would the virtual group use?
- What health information technology is used by each TIN within the virtual group?
- What would be the resources and needs of the virtual group?
- How would the virtual group identify and share best practices used by TINs within the virtual group?
- What processes, workflows, and other tools would need to be established for the virtual group to prepare for reporting?
- How would each TIN within the virtual group have a shared responsibility in decision making?
- Has the virtual group considered the development of a strategic plan and timeline?
- Has the virtual group determined if, how, and when TINs within the virtual group would be able to view quality data and/or data pertaining to the other 3 performance categories, in which such permissibility could be established as a provision under the virtual group agreement?





Virtual Group Agreement Checklist

CMS has created a [Virtual Group Model Agreement](#) (on the following page) to serve as a template that could be used by virtual groups. Virtual groups can add elements to the agreement that would meet the needs of the virtual group.

The following are the required elements of a formal written agreement between each solo practitioner and group that composes a virtual group:

- Identifies the parties to the agreement by name of party, TIN, and NPI, and includes as parties to the agreement only the groups and solo practitioners that compose the virtual group.
- Requires that each TIN within a virtual group notify all NPIs associated with the TIN of their participation in MIPS as a virtual group.
- Is executed on behalf of each party by an individual who is authorized to bind the party.
- Expressly requires each member of the virtual group (and each NPI under each TIN in the virtual group) to participate in MIPS as a virtual group and comply with the requirements of MIPS and all other applicable laws and regulations (including, but not limited to, federal criminal law, False Claims Act, anti-kickback statute, civil monetary penalties law, the Health Insurance Portability and Accountability Act of 1996, and physician self-referral law).
- Sets forth the NPI's rights and obligations in, and representation by, the virtual group, including without limitation, the reporting requirements and how participation in MIPS as a virtual group affects the ability of the NPI to participate in MIPS outside of the virtual group.
- Describes how the opportunity to receive payment adjustments will encourage each member of the virtual group (and each NPI under each TIN in the virtual group) to adhere to quality assurance and improvement.
- Requires each party in the agreement to update its Medicare enrollment information, including the addition and deletion of NPIs billing through its TIN, on a timely basis in accordance with Medicare program requirements and to notify the virtual group representative of any such changes within 30 days after the change.
- Is for a term of at least 1 performance period as specified in the formal written agreement.
- Requires completion of a close-out process upon termination or expiration of the agreement that requires each party to the virtual group agreement to furnish, in accordance with applicable privacy and security laws, all data necessary in order for the virtual group to aggregate its data across the virtual group.





Virtual Group Agreement Template

Sample Introductory Paragraph:

This Virtual Group Agreement ("Agreement") is by and between Virtual Group Identifier provided by the Centers for Medicare & Medicaid Services, and XYZ Group Practice P.C. ("virtual group member") and is effective [Month, Day, Year] ("Effective Date").

<Body of Agreement>

Sample Signature Page:

IN WITNESS WHEREOF, the parties have caused this Agreement to be executed by the duly authorized representatives as of the dates below.

Virtual Group Member/National Provider Identifier

Signature

Virtual group agreement is valid for at least 1 performance period.

Requires completion of close-out process upon termination or expiration of agreement.

Identifies parties that are subject to the agreement by name of party, TIN, and NPI.

NOTE: Each TIN within a virtual group must notify all NPIs associated with that TIN of their participation in MIPS as a virtual group.

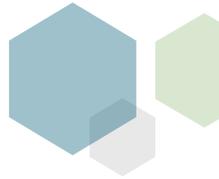
Identify virtual group member joining/ forming virtual group.

Date virtual group agreement goes into effect.

Agreement is executed on behalf of each party by an individual authorized to bind the party.

- Agreement must also:
- Express and require each virtual group member to comply with requirements of MIPS and other applicable laws and regulations.
 - Set forth NPI's rights and obligations in, and representation by, the virtual group.
 - Describe the opportunity to receive payment adjustments.
 - Require each member of the agreement to update their Medicare enrollment information and the official representative to notify CMS of updates.





VIRTUAL GROUP ELECTION SUBMISSION E-MAIL SAMPLE
This is a sample email that could be used in a virtual group election submission.

Enter "Virtual Group Election" into the subject line.

Subject: Virtual Group Election

Identify yourself (official representative).

Body of E-Mail:

Official virtual group representative:

John Doe
Group Practice X
1211 Example Avenue
Example, EX 11111
Phone: (555) 555-5555
E-Mail: JohnDoe@GroupPracticeX.com

As the official representative, I acknowledge that a formal, written agreement has been established between the below groups and solo practitioner.

Acknowledge that a written virtual group agreement has been established and indicate the participating members (groups and/or solo practitioners) that will be participating in the virtual group.

Identify virtual group member by name of party, TIN, and NPI.
NOTE: You may use an Excel file format for virtual groups with a large number of NPIs by structuring the file with the first column being the group practice name, then TIN, NPI, and first name, last name.

The following groups and solo practitioner are electing to form a virtual group:

- Group Practice X: (TIN) XX-XXXXXXX
 - Clinician A Name: (NPI) XXXXXXXXXXX
 - Clinician B Name: (NPI) XXXXXXXXXXX
 - Clinician C Name: (NPI) XXXXXXXXXXX
- Group Practice Y: (TIN) XX-XXXXXXX
 - Clinician D Name: (NPI) XXXXXXXXXXX
 - Clinician E Name: (NPI) XXXXXXXXXXX
 - Clinician F Name: (NPI) XXXXXXXXXXX
 - Clinician G Name: (NPI) XXXXXXXXXXX
- Dr. Z Practice: (TIN) XX-XXXXXXX (TIN is the SSN of Dr. Z; only provided the last six digits as required by CMS)
 - Clinician Z Name: (NPI) XXXXXXXXXXX

If a clinician's TIN is their SSN, provide **ONLY** the last 6 digits of the clinician's SSN.

Virtual Group elections should be emailed to: MIPS_VirtualGroup@cms.hhs.gov

