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What Is a Virtual Group Under the Quality Payment Program & Should You Join One?

Dr. Birnholz:

Even though the Quality Payment Program under the Medicare Access and CHIP Reauthorization Act, or MACRA, has been a known entity since 2016, the option to participate as a virtual group is still relatively new, leading many physicians to wonder what exactly this means to be in such a group, whether it's the right option for them, and how they can join one. These and other question areas will be the focus of today's discussion. Coming to you from the ReachMD studios in Fort Washington, Pennsylvania, this is "Inside Medicare's New Payment System," and I'm Dr. Matt Birnholz. Joining me from the American Medical Association to help make sense of virtual groups and their role within the Quality Payment Program is Ashley McGlone, Washington Counsel for the AMA.

Ms. McGlone, welcome to the program.

Ms. McGlone:

Thanks for allowing me to be here.

Dr. Birnholz:

It's great to have you. So, to start, can you provide some background on this virtual group option? Who specifically is eligible to join them?

Ms. McGlone:

Sure. So, the Virtual Group Option became available in performance year 2018 of the Merit-based Incentive Payment System program, or MIPS, and the Virtual Group Option is available to group practices with 10 or fewer clinicians, or solo practitioners. The groups must include at least 1 that's an eligible clinician. So, a physician or group can only participate in 1 virtual group during their performance period, but there are no limits on the number of solo practitioners or groups that can actually join together to form a virtual group, so these virtual groups can be as large as they desire, and there's also not any restrictions on the formation of virtual groups based on location or specialty. There is 1 caveat: physicians who are newly enrolled in Medicare, physicians who fall below the low-volume threshold or physicians who are qualifying or partially qualifying APM participants and are exempt from participating in the MIPS program will be exempt from participating in virtual groups.

Dr. Birnholz:

Interesting. And when it comes to reporting, what are the benefits of doing that as a virtual group?

Ms. McGlone:

Sure. So, the reporting requirements across the 4 performance categories of MIPS are basically the same for virtual groups as they are for other MIPS participants. The real benefit of forming a virtual group is that it allows a physician to combine with other physicians or groups to aggregate their data and achieve the requirements under each performance category of MIPS.

Dr. Birnholz:

I see, and if we're talking about pooling or aggregating data to achieve these requirements, how do virtual groups actually go about doing this?

Ms. McGlone:

Sure, so all the TINs, or Tax Identification Numbers, within the virtual groups will aggregate their data for all the performance categories within MIPS—so for the Quality Performance category, for the Advancing Care Information category, for the Improvement Activities category and for the Cost category. A whole TIN has to participate in a virtual group, so all the members of the group are going to

participate in the virtual group and actually receive a score based on the virtual group's data that they've reported. However, the MIPS-eligible clinicians in the virtual group are the only ones who will receive a payment adjustment. And just to note, that actually differs from the Group Reporting Option where all the members of the group will receive a MIPS payment adjustment. So, most of the group-related policies throughout MIPS also apply to virtual groups, and that includes the non-patient-facing status, the rural status and the small practice status, so you retain the special scoring options if you are in a virtual group, the same way you would if you participate as an individual or a group. So, for example, a virtual group would have small practice status if the virtual group has fewer than 16 eligible clinicians.

Dr. Birnholz:

For those just tuning in, this is "Inside Medicare's New Payment System," on ReachMD, and I'm Dr. Matt Birnholz. With me to help define the roles of virtual groups in quality reporting under MACRA is Ashley McGlone, Washington Counsel for the AMA.

So, Ms. McGlone, earlier, you touched upon who these virtual groups are ideal for and how they can meet initial requirements. What does that timeline look like for participating?

Ms. McGlone:

Sure, so the statutory requirement within MACRA requires that physicians have to elect to participate in a virtual group prior to the start of a performance period. So, for the 2018 performance period, the virtual group election dates ran from October 11, 2017 through December 31, 2017, and we are expecting the 2019 virtual group election period dates to be similar. Those will likely be released this summer or early fall. Once a physician or group elects to be a part of a virtual group, they cannot change that election once the performance period has begun. For the 2018 performance period, and what we expect to see going forward, CMS developed a 2-stage election process for virtual groups. So, during stage 1, the group or the individual physician can contact the technical assistance representative in their area to get information on virtual groups and to actually determine whether or not they're eligible. And then, for groups who don't elect to participate in stage 1, CMS will go ahead and determine their eligibility to form a virtual group when the group submits an email to the Quality Payment Program Service Center that they are forming a virtual group, which is during stage 2 of the election process. So, whatever official within the virtual group has been designated as the virtual group representative, that official has to submit the official election to CMS via email.

Dr. Birnholz:

I see. And before that election period even begins, what kind of information do you think physicians can be gathering now to help make that whole process easier for them?

Ms. McGlone:

Sure. So, sort of on the administrative back end, the TINs that make up a virtual group have to establish a written formal agreement between each member of the virtual group prior to election. And so, CMS actually has some examples of that formal written agreement on their website, which are very helpful, and the virtual group election submission should basically include the following information that you could start gathering now. It should include the TIN and NPI associated with the virtual group, so all the TINs and all the NPIs within each TIN, the name and contact information of the virtual group representative, and then confirmation that there is a formal written agreement between each member of the virtual group prior to that election.

Just some other things to note, each party that makes up the virtual group has to keep a copy of the virtual group's written agreement on hand, and if the virtual group does meet the eligibility criteria, then CMS will contact the representative via email and give the virtual group an identifier that will be used for reporting data for the performance period in early 2018 last year or in early 2019 if they're electing to become a virtual group in 2019, that the virtual group will use for reporting. And finally, just to note, the virtual groups will have to re-register before each performance period, so even if you're a virtual group in 2018, you'll have to re-elect and re-register for 2019.

Dr. Birnholz:

I also understand that there's a toolkit that's available for physicians. Is that the case?

Ms. McGlone:

There is a toolkit. So, CMS actually offers a great, really informative virtual group toolkit that is on the CMS website. And actually, the easiest way to find that is to go to www.CMS.gov and actually search in the search box, Virtual Group Toolkit, and it is the first link that pops up. And as I mentioned earlier, that toolkit includes a virtual group agreement template, which is really helpful and can assist physicians in drafting those formal written agreements that are required between every physician that makes up a virtual group. And the other thing is that the AMA actually has plans to create additional resources for physicians that are interested in joining virtual groups that we hope to be up on our website shortly. So, check back on our MACRA web page periodically for new virtual group information.

Dr. Birnholz:

It's a great takeaway for our audience, and these have all been great insights into virtual groups for MIPS-eligible physicians. I want to thank my guest, Ashley McGlone, Washington Counsel for the AMA, for walking us through that enrollment process and what it looks like.

Ms. McGlone, it was great having you on the program.

Ms. McGlone:

Yes, thanks for allowing me to be here. I appreciate it.

Dr. Birnholz:

This is ReachMD. I'm Dr. Matt Birnholz. To download this podcast or others in this series, visit ReachMD.com/AMA. We welcome your comments and feedback, and thanks for listening.