

## **CMS Response to Public Comments Received for CMS-10652**

The Centers for Medicare & Medicaid Services (CMS) received two comments related to CMS-10652 Virtual Groups for the Merit-based Incentive Payment System (MIPS).

**Comment:** One commenter supported streamlining the virtual group election process by using online registration and submission of supporting documents.

**Response:** We will respond to all comments related to the virtual groups and the virtual group election process in the final rule. As discussed in the CY 2017 QPP proposed rule (82 FR 30030 through 30031), as part of our commitment to minimize burden, we intend to provide technical assistance and an email-based virtual group election process that would occur for the 2018 MIPS performance period. However, for Quality Payment Program year 3, we intend to provide an electronic election process if technically feasible.

**Comment:** One commenter encouraged CMS to waive the low-volume threshold exclusion for eligible clinicians that elect to participate in a virtual group. This commenter argued that the low-volume threshold prohibits solo practitioners and small practices from capitalizing on the opportunity to move to value-based payment.

**Response:** This comment is outside the scope of CMS-10652 Virtual Groups for the Merit-based Incentive Payment System (MIPS). We will respond to all comments related to virtual groups and the low-volume threshold in the final rule.