

# IMPACT

*Virtual First Medical  
Practice Collaboration*

Hosted by the Digital Medicine Society (DiMe) and the American Telemedicine Association (ATA), IMPACT is a pre-competitive collaboration of leading digital health companies, investors, payers, and consultants dedicated to supporting virtual first care (V1C) organizations and their commitment to patient-centric care. Terms used throughout this resource are defined in the [Glossary of Terms](#).

## Contract Exhibit: Subcontractors

This exhibit focuses on subcontractors and should be included where the contracting entity has subcontractors involved in the delivery of their work. This section then details how those subcontractors will be selected, qualified for their roles, and what their responsibilities will be.

### V1C CONSIDERATION: Subcontractors

Subcontractors of V1C solutions generally fall into three categories. Depending on which kinds of functions will be served by subcontractors, inclusion of one or several of these sections may be appropriate.

- Consultants or gig workers who may be on a 1099 (independent workers who receive non-employment income). For these individuals, contracts may specify required workforce controls such as background checks or verification of required licensure.
- Vendors and other service providers such as technology companies, cloud service providers, data processors, or other third-parties that support functions of the V1C (especially technology function). These subcontractors are the V1C’s business associates, and the V1C should have business associate agreements (BAAs) in place with them. Contracts may specify requirements around liability insurance.
- If the V1C solution operates as a professional corporation (PC) and affiliated management services organization (MSO) that entity should be referenced here. It is the V1C PC’s responsibility to ensure that this contract does not interfere with the MSO being able to perform necessary functions.

### TO AVOID ☆☆☆

Payer approval for subcontractors — Health Insurance Portability and Accountability Act (HIPAA)-covered entities should be trusted to select and perform their duties without payer approval

Strict BAA pass-thrus. V1C’s often have minimal ability to negotiate changes to service provider BAAs (especially BAAs from large cloud service providers)

### QUICK LINKS: [GUIDE TO PAYER - VIRTUAL FIRST CARE \(V1C\) CONTRACTING](#)

#### Overview

[Payer-V1C Contract Fundamentals](#)

[How To Use The Guide to Payer-V1C Contracting](#)

[Glossary of Terms](#)

#### Contract Body

- [Termination Rights](#)
- [Assignment of Agreement or Obligations](#)
- [Business Associate Agreement](#)
- [Publicity](#)
- [Payment](#)

#### Contract Exhibits

- [Data](#)
- [Subcontractors](#)
- [Credentialing/Certification & Licenses](#)
- [Audits](#)
- [Publication Rights](#)
- [Statement of Work](#)