

AMCNO MEDICARE UPDATE

Providers Have Until October 1st to Request to Enter Targeted Review Process

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Providers and clinicians who participated in the Merit-based Incentive Payment System (“MIPS”) in 2017 now have the opportunity to review their MIPS performance feedback. This will allow participants in the program to request a targeted review of their payment adjustment scheduled for 2019 if they feel an error has been made by CMS. Advanced alternative payment model (“APM”) entities and accountable care organizations can also access and review 2017 performance feedback to determine if they should request a targeted review. The targeted review process was created to allow providers an opportunity to review the CMS determinations made regarding their MIPS performance feedback.

In order to determine if a targeted review should be requested, participants should first log on to their respective Enterprise Identity Management (“EIM”) account to view their MIPS performance feedback. The performance feedback for each provider will include the provider’s 2017 final score, 2019 MIPS payment adjustment, and final performance category scores and weights. The 2019 MIPS payment adjustment will include a positive, negative, or neutral payment adjustment that will be applied to the Medicare paid amount for covered professional services furnished under the Medicare Physician Fee Schedule in 2019. Participants will also be able to view detailed scoring and performance information for each of the performance categories.

Participants should review all the information available on their EIM account carefully to determine if they should submit to the targeted review process. Below are several

potential issues participants may see that indicate they should seek out the targeted review process:

- Errors or data quality issues on the measures/activities which were submitted by the participant;
- Eligibility issues, such as participants falling below the low-volume threshold and should not have received a payment adjustment;
- Exclusion from the APM participation list and not being scored under APM scoring standard; and
- If a participant is not automatically reweighted, despite qualification due to the 2017 extreme and uncontrollable circumstances policy.

While this is certainly not a comprehensive list of circumstances, it’s these types of issues that participants should look for when reviewing their MIPS feedback.

If participants determine that there has been an error in their performance feedback and they wish to enter the targeted review process, there are several steps they can take to increase their chances of altering their 2019 payment adjustment. First and foremost, CMS has encouraged participants to provide supporting documentation that a targeted review is warranted. Any written evidence that there are errors in MIPS feedback will significantly increase participants’ chances of receiving a favorable adjustment. Second, participants should note that the deadline to request a targeted review is **October 1, 2018, at 8:00pm EST**. No targeted review requests will be accepted after that date.

If your targeted review request is approved, CMS has stated it will update participants’ final score and associated payment adjustment as soon as technically feasible. CMS will determine the amount of the upward payment adjustments after the conclusion of the targeted review submission period. All targeted review determinations are final and cannot be appealed.

It is important participants take time to closely review their MIPS data and provide supporting documentation to any request for a targeted review, as it could significantly increase their reimbursement for 2019. ■