CMS Provides Final 2017 MIPS Performance Results

CMS recently made final 2017 Merit-Based Incentive Payment System (MIPS) Performance Year results available via the Quality Payment Program (QPP) web <u>portal</u>. ACOs are able to log-in using their Tax Identification Number (TIN) to access the ACO entity's final performance data. The final MIPS score and resulting 2019 payment adjustment should be displayed. Please note that when ACO participant TINs (practices) log-in, they will see their TIN's unique Advancing Care Information (now "Promoting Interoperability") score and will not be able to see the ACO entity's final MIPS score and resulting payment adjustment. Therefore, ACOs will need to communicate final MIPS performance scores and resulting 2019 payment adjustments to their ACO participant TINs. Further, should the ACO wish to calculate the ACO's average Promoting Interoperability performance category score, they will need to request the participant TINs share that information with the ACO.

The MIPS payment adjustment displayed for the ACO will be applied to the Medicare paid amounts for covered professional services furnished under the Medicare Physician Fee Schedule in 2019 for all MIPS eligible clinicians in ACO participant TINs as of the 8/31/17 final snapshot date. For more information about snapshot dates, please access our ACO Guide to MACRA- 2017 edition. For more information on how MIPS payment adjustments are applied, please refer to this new CMS fact sheet.

ACOs may request for CMS to review their performance feedback and final score through a process called targeted review. If you believe an error has been made in your 2019 MIPS payment adjustment calculation, you can request a targeted review from now until **September 30, 2018**. Review requests can be submitted by logging into the QPP web portal. More information on the targeted review process is available here. NAACOS will continue to urge CMS to make MIPS performance information transparent for ACOs and across the program. We will also be urging CMS to compare ACO performance to non-ACO performance, as our projections show that ACOs will be among the top performers in MIPS.

Key things for ACOs to note about the MIPS 2017 Performance Year results:

- It is our understanding that CMS is providing ACOs with the ACO entity's final MIPS score as well as the resulting payment adjustment for that score. This score will apply to all MIPS eligible clinicians in ACO participant TINs as of the 8/31/17 final snapshot date. For more information about snapshot dates, please access our ACO Guide to MACRA- 2017 edition.
- It appears that in some cases, CMS is only providing practice TINs with their TIN-specific ACI/PI score. Therefore, in these cases the ACO will need to communicate the ACO entity's final MIPS score and resulting payment adjustment for 2019 to all participant TINs.
- CMS staff have confirmed with NAACOS that the payment adjustments being displayed in the QPP portal currently include the 'exceptional performance' bonuses.
- Looking at the results of certain ACOs who have been willing to share their performance information, it appears that a perfect score of 100 points will earn a 2.02 bonus/positive payment adjustment in 2019.