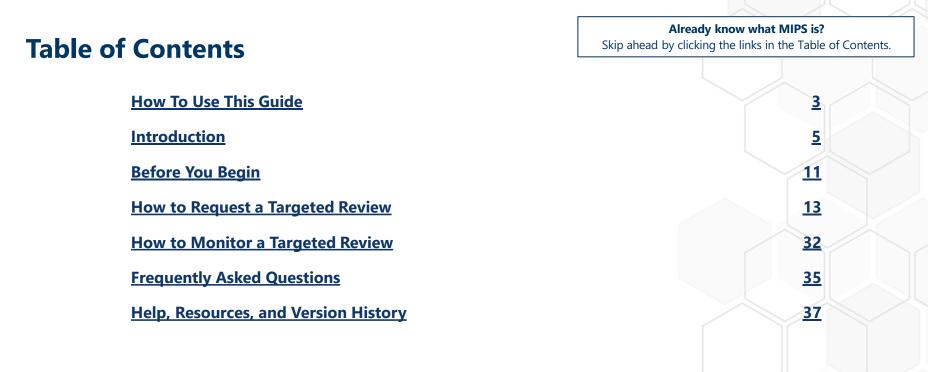
Merit-based Incentive Payment System (MIPS)

2022 Targeted Review Guide

Quality Payment



<u>Purpose</u>: The purpose of this guide is to describe what a targeted review is, provide step-by-step instructions on how to complete the request form, and explain what to do after submitting your request.







How to Use This Guide

Quality Payment



Table of Contents

The table of contents is interactive. Click on a chapter in the table of contents to read that section.



You can also click on the icon on the bottom left to go back to the table of contents.

Purpose: This guide was prepared for informational purposes only and is not intended to grant rights or impose obligations. The information provided is only intended to be a general summary. It is not intended to take the place of the written law, including the regulations. We encourage readers to review the specific statutes, regulations, and other interpretive materials for a full and accurate statement of their contents.

This guide captures images of the process for opting-in or voluntarily reporting. The information captured in the screenshots may not be the exact language, workflow, or design that was finalized in the system.

Hyperlinks

Hyperlinks to the <u>Quality Payment Program website</u> are included throughout the guide to direct the reader to more information and resources.





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What Is a Targeted Review?

Targeted review is the process through which Quality Payment Program (QPP) participants can request that the Centers for Medicare & Medicaid Services (CMS) review the calculation of their 2024 MIPS payment adjustment factor(s) and, if applicable, their additional MIPS payment adjustment factor for exceptional performance.

Once 2024 MIPS payment adjustment factor(s) are released, you have **60 days** to request a targeted review for the 2022 calendar year.

The last day you can submit a targeted review for the 2022 performance year is **October 9, 2023**.

While you have 60 days to complete your request, you should request a targeted review **as soon as possible** if you identify an error with your MIPS final performance feedback and MIPS payment adjustment factor(s). This will help ensure that the correct payment adjustment is applied to your claims from the start of the 2024 payment year.



Where Is the Targeted Review Application Located?

You can access the Targeted Review application by signing in to the <u>QPP website</u>. You need a **Healthcare Quality Information System (HCQIS) Access Roles and Profile (HARP) account** to sign in and access the Targeted Review application.

Visit the <u>QPP Access User Guide (ZIP, 4.1 MB)</u> for instructions on how to create a HARP account. For additional information on HARP, check out the <u>HARP FAQs</u>.

Who Can Request a Targeted Review?

You can request a targeted review if you're a(n):

- MIPS eligible clinician
- Group
- Virtual group
- Alternative Payment Model (APM) participant (individual clinician, group, APM Entity (including a Shared Savings Program Accountable Care Organization [ACO]))

Third party intermediaries and designated support staff can submit a targeted review on behalf of program participants.



What Can I Request a Targeted Review for?

As described in section 1848(q)(13)(A) of the Social Security Act, targeted review is limited to the calculation of the MIPS payment adjustment factor(s). You may request a targeted review if you find an error with your **2024 MIPS payment adjustment factor(s)** and associated **2022 MIPS performance feedback**.

While this isn't a comprehensive list, the following are examples of circumstances for which you may wish to request a targeted review.

- Your performance data was submitted under the incorrect Taxpayer Identification Number (TIN) or National Provider Identifier (NPI).
- You qualified for performance category reweighting because of a special status designation, Promoting Interoperability Hardship Exception, or Extreme and Uncontrollable Circumstances Exception that was incorrectly applied.



What Can't I Request a Targeted Review for? (Continued)

There are statutory limitations on administrative and judicial review as described in section 1848(q)(13)(B) of the Social Security Act. As such, there will be no targeted review of the following:

- The methodology used to establish the amount of the MIPS payment adjustment factor, the amount of the additional MIPS payment adjustment factor, and the determination of such amounts.
- The establishment of the performance standards and the performance period.
- The identification of measures and activities specified for a MIPS performance category and information made public or posted on <u>Medicare Care Compare</u>.
- The developed methodology used to calculate performance scores and the calculation of such scores, including the weighting of measures and activities under such methodology.

See the following page for examples of **valid and invalid targeted review requests**.

A targeted review request for any of these reasons will be denied.



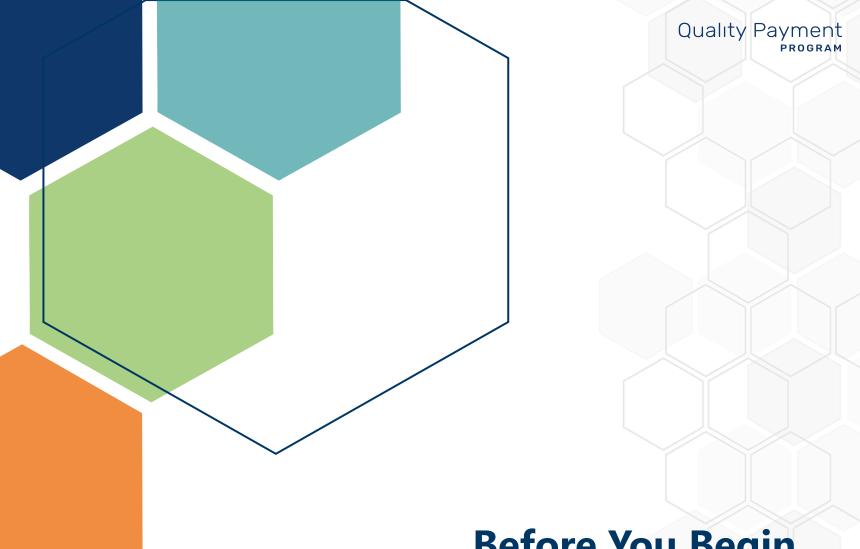
Examples of Valid and Invalid Targeted Review Requests

	Valid Reasons to Request a Targeted Review
Denominator Reduction	"I submitted all of the quality measures available to me, but my denominator wasn't reduced."
Incorrect TIN/NPI	"My data was submitted under the wrong TIN or NPI."
Special Status Designation	"I have a special status that isn't reflected in my performance category score."
Incorrectly Scored with an Approved Hardship Exception	"I was scored in the [Promoting Interoperability] performance category but was approved for reweighting through a MIPS Promoting Interoperability Hardship Exception application."
QP Designation	"I was identified as a Qualifying APM Participant (QP), but I'm not a participant in an Advanced APM."
Missing Final Score	"My APM Entity reported the APP, but I didn't receive a final score associated with my APM Entity."
	Invalid Reasons to Request a Targeted Review
Final Score and Payment Adjustment Location	Invalid Reasons to Request a Targeted Review "I want to know where I can find my final score and payment adjustment."
Final Score and Payment Adjustment Location	"I want to know where I can find my final score and payment adjustment."
Final Score and Payment Adjustment Location	"I want to know where I can find my final score and payment adjustment." "I want to know why my payment adjustment is so low."
Final Score and Payment Adjustment Location Low Payment Adjustment Historical Benchmark	"I want to know where I can find my final score and payment adjustment." "I want to know why my payment adjustment is so low." "I disagree with the historical benchmark used to determine my measure's score."

Have you experienced an issue with your data? Issues related to inaccurate, unusable, or otherwise compromised data don't fall under the scope of a targeted review and will be denied. If you're requesting performance category reweighting because of inaccurate, unusable, or otherwise compromised performance data, contact the <u>QPP Service Center</u>.

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Before You Begin



Before You Begin

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Overview

To prepare for the targeted review process, you should:

□ Identify who will request the targeted review

• The targeted review request will be accessible by the person who submits the request ("submitter") and those whom the submitter adds as "additional staff members."

Obtain or access your HARP account

- You must have a HARP account to complete and submit a targeted review request.
 - **New Users:** Register for QPP to obtain your HARP credentials.
 - **Returning Users:** Confirm that you can sign in to QPP with your HARP credentials.
 - If you're a Shared Savings Program ACO's QPP Security Official or QPP Staff User contact in the <u>ACO Management System (ACO-MS)</u>, then you can sign in to the QPP website using your ACO-MS username and password.

□ Gather identifying information and supporting documentation

- Collect the clinician, group, virtual group, or APM participants' identifying information
 - **Clinician** NPI and associated practice's legal practicing name.

You don't need a specific role (for example, security official) for your organization to submit a targeted review request.

- Group The practice's TIN and legal practicing name.
- Individual clinician, group, or APM Entity participating in an APM – APM Entity identification number (ID).
- Approved virtual group Virtual Group ID.
- Collect any documentation that supports your targeted review request. If possible, attach supporting documentation with your initial request. Supporting documentation may include, but isn't limited to:
 - Extracts from the MIPS eligible clinician's Electronic Health Record (EHR)
 - Copies of performance data provided to a third party intermediary by the clinician or group
 - Copies of performance data submitted to CMS
 - QPP Service Center case numbers
 - Signed contracts or agreements between a clinician/group and a third party intermediary
 - Proof of your APM participation

Documentation **may vary** based on the circumstances of the targeted review request.





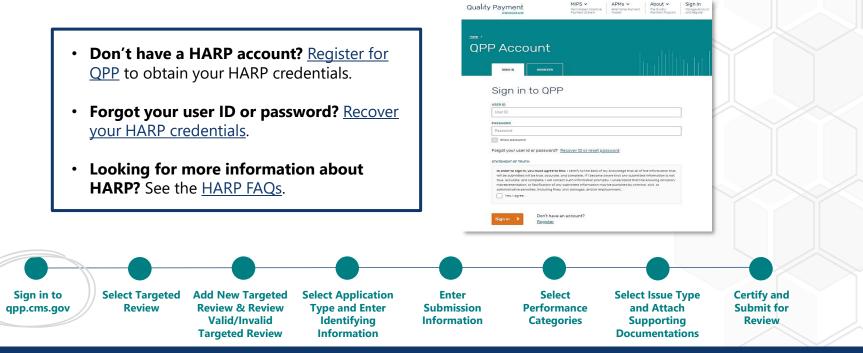


Overview

This section of the guide provides step-by-step instructions on how to complete the Targeted Review Request application located within your **QPP account** on the <u>QPP website</u>.

Please note that if you are a Shared Savings Program ACO's QPP Security Official or QPP Staff User contact in the <u>ACO</u> <u>Management System (ACO-MS)</u>, then you can sign in to the QPP website using your ACO-MS username and password. For guidance on how to add the QPP Security Official and QPP Staff User contacts to an ACO in ACO-MS, please refer to the <u>ACO-MS User Access and ACO Contents Tip Sheet</u>.

Step 1: Sign in to your QPP account using your HARP credentials on the <u>QPP</u> website.



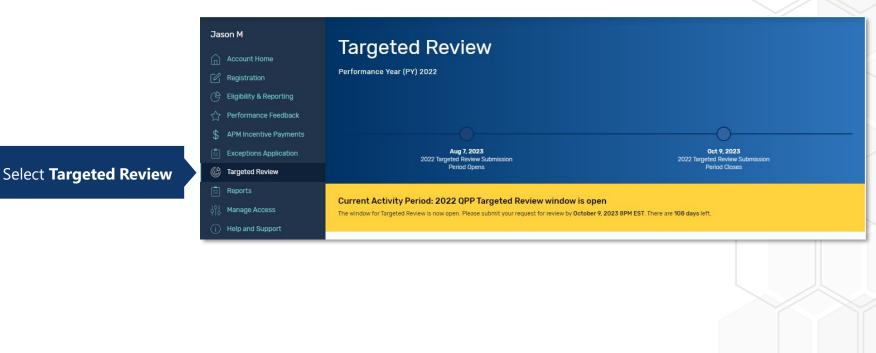


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Step 2: Select Targeted Review

Select Targeted Review from the left-hand navigation pane.

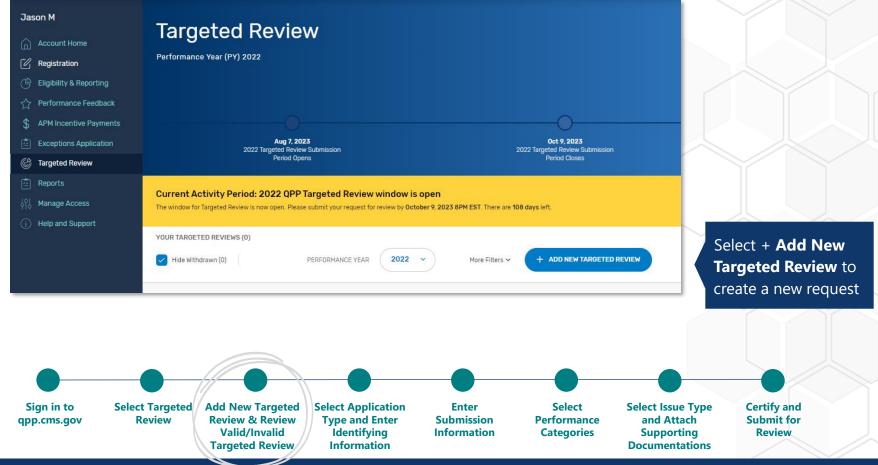






Step 3a: Add New Targeted Review

On the Targeted Review Progress Summary page, select + **Add New Targeted Review** to create a new Targeted Review application.



Step 3b: Valid and Invalid Targeted Review Examples

Review the list of valid and invalid targeted review examples, then select **continue**.

Add New Targeted

Review & Review

Valid/Invalid

Targeted Review

Select Targeted

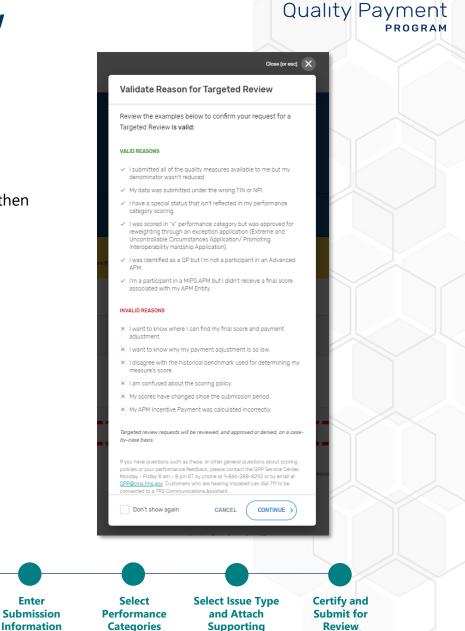
Review

Select Application

Type and Enter

Identifying

Information



Documentations



Sign in to

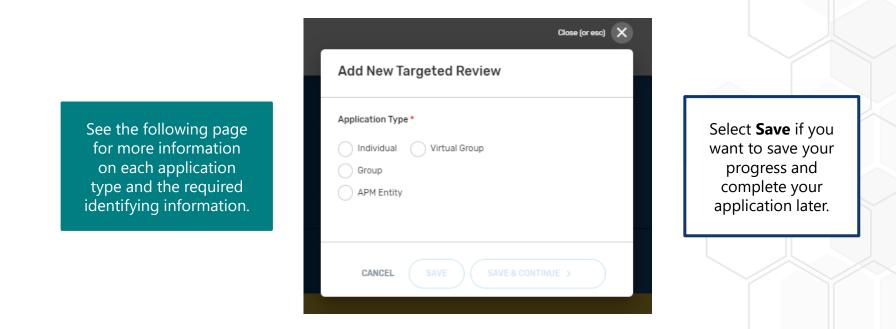
qpp.cms.gov

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Step 4a: Select Application Type

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Select **the application type** that aligns with **how your data was submitted**¹ to MIPS for the 2022 calendar year. Then select **Save & Continue**.



¹There are circumstances under which you'll request your targeted review at a different level than how your data was submitted. These circumstances include, but aren't limited to, requesting a targeted review of an eligible clinician's MIPS eligibility or eligibility to be scored under the APM Performance Pathway (APP).



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Step 4b: Provide Identifying Information

Enter the required **identifying information** based on which application type you choose. Each application type requires a different type of identifying information (for example, individual – NPI; group – TIN).

Note: You have the option to create a name (personal reference only) for your request by clicking the pencil icon next to your request on the **Targeted Review Progress Summary** page.

Application Type	Select if you're	You will be asked to provide the following identifying information	Fields with a red asterisk (*) are
Individual	 Requesting a targeted review of the final score received from individual participation A MIPS eligible clinician who participated in MIPS individually by submitting data under your unique TIN/NPI combination. Requesting a targeted review of a clinician's MIPS eligibility. 	Clinician NPI * ⑦ e.g. 1234567890	required.
Group	 Requesting a targeted review of the final score received from group participation. A practice that participated in MIPS as a group by submitting aggregated data under a single TIN on behalf of all eligible clinicians in your practice. 	Group TIN • ③ e.g. 123456789	
Sign in to qpp.cms.gov	Review Review Type and Enter Submission Performance	lect Select Issue Type mance and Attach gories Supporting Documentations	for



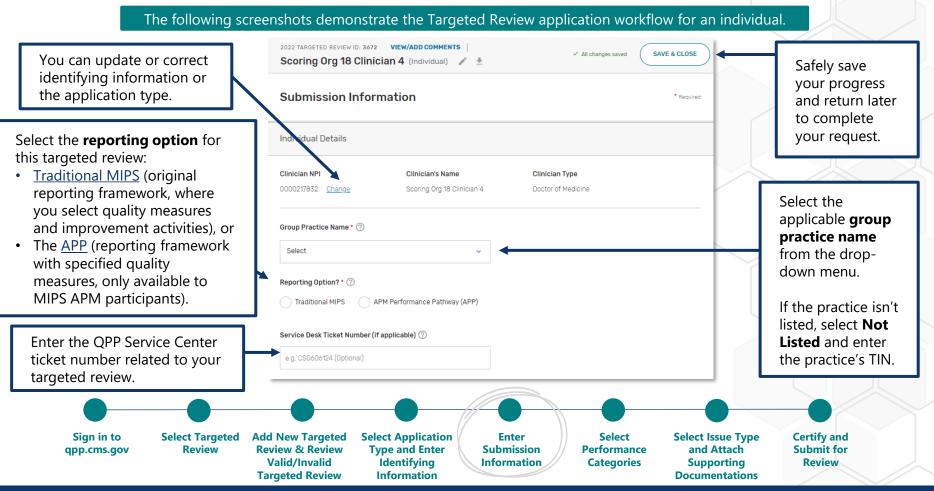
Step 4b: Provide Identifying Information (Continued)

Application Type	Select if you're	You will be asked to provide the following identifying information	Fields with a red asterisk (*) are
Virtual Group	 Requesting a targeted review of the final score received from virtual group participation. A part of an approved virtual group that participated in MIPS by submitting aggregated data under your virtual group ID on behalf of all TINs within the virtual group. 	Virtual Group ID * ⑦ @ g. ABCDE123456780 Application Title ⑦ Untitled For personal reference only. Will not be displayed on submitted application.	required.
APM Entity	 Requesting a targeted review of the final score received from APM Entity participation. An APM Entity that submitted data through the APP or traditional MIPS on behalf of all eligible clinicians in the entity. An APM Entity requesting a targeted review of the entity's Promoting Interoperability category score. 	APM Entity ID • ⑦ e.g. ABCDE123456780	
Sign in to qpp.cms.gov	Review Review & Review Type and Enter Submission Perfor	lect Select Issue Type and Attach Supporting Documentations	t for

Step 5a: Submission Information – Individual, Group, Virtual Group, APM Entity Details

Verify the prepopulated information (for example, clinician's name, clinician type, group's name, etc.).

Note: The prepopulated information is pulled from the <u>QPP Participation Status Tool</u> using the identifying information (NPI, TIN, Virtual Group ID, APM ID) you entered during step 4.



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Step 5b: Submission Information – Submitter Details

Enter your preferred **contact information** and **identify your relationship** with the party for whom you're requesting a targeted review.

Enter your phone number with or without dashes.	2022 TARGETED REVIEW ID: 3672 VIEW/ADD COMMENTS Source Saved Save CLOSE Save Save Save Save Save Save Save Save	Select the relationship option that best represents
Note : You must enter a valid area code.	Contact Phone Number * ⑦ Phone Number 866-288-8292 Ext. (Optional)	your relationship to the party requesting a targeted review.
	Contact Email Address * ⑦	Note : If you select Other , you'll be
Enter the email address	qpp@cms.hhs.gov Submitter/Third Party Intermediary Relationship * ⑦	prompted to describe your relationship.
associated with your HARP account.	Please specify	
Note : If your email	Clinician	lf you select
address has changed,	Consultant	Registry / Qualified Clinical Data
please update your profile information within	Physician Staff	Registry (QCDR) ,
your HARP account.	EHR Vendor	we'll pull information from the party's API
	Other	token.
Sign in to Select Targeted	Add New Targeted Select Application Enter Select Select Issue	e Type Certify and
qpp.cms.gov Review	Review & ReviewType and EnterSubmissionPerformanceand AttValid/InvalidIdentifyingInformationCategoriesSupportTargeted ReviewInformationDocument	ting Review



Step 5c: Submission Information – Additional Access

You can provide the email address(es) of additional staff or representatives who should receive notifications about the status of the request.

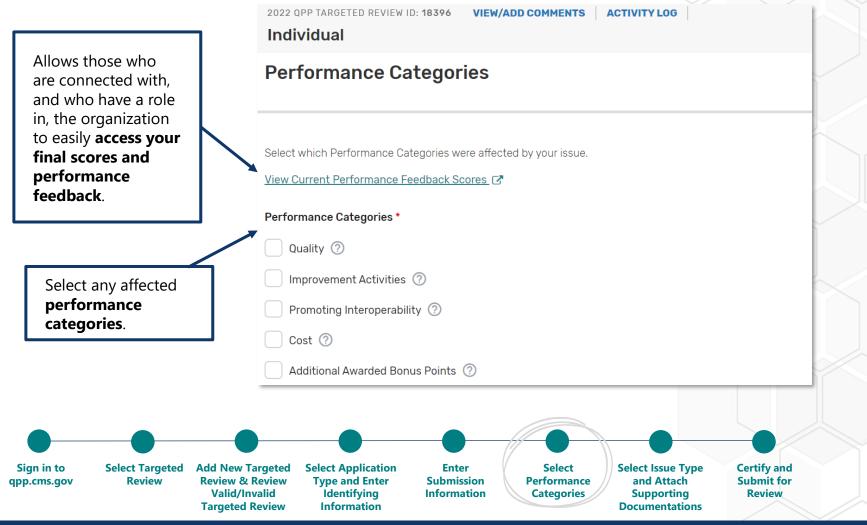
- If you enter an email address that's associated with an individual's HARP account, that person will be able to access the Targeted Review application and receive notifications about the status of the request when they sign in with their HARP credentials on the <u>Quality Payment Program website</u>.
- If you're submitting an application on behalf of an individual, group or virtual group, users with access to the practice or virtual group on the <u>Quality Payment Program website</u> will be able to access the application **only** if you add the email associated with their HARP account.

		GETED REVIEW ID: 3672 VIEW/ADD COMMENTS		✓ All changes saved	SAVE & CLOSE	×
Enter additional staff member email addresses	Additio	nal Access				
separated by a comma.	Addition	al Staff Access Email(s) ⑦				
commu.	Entere	mail address(es)]			
	Hit enter/co	mma after each entry to add multiple	-			K
•						
 gn in to Select Targeted o.cms.gov Review	Add New Targeted Review & Review Valid/Invalid Targeted Review	Type and Enter Submission P	Performance Categories	Select Issue Type and Attach Supporting Documentations	Certify and Submit for Review	



Step 6: Performance Categories

Select the **performance categories** that were affected by the issue(s) you experienced.

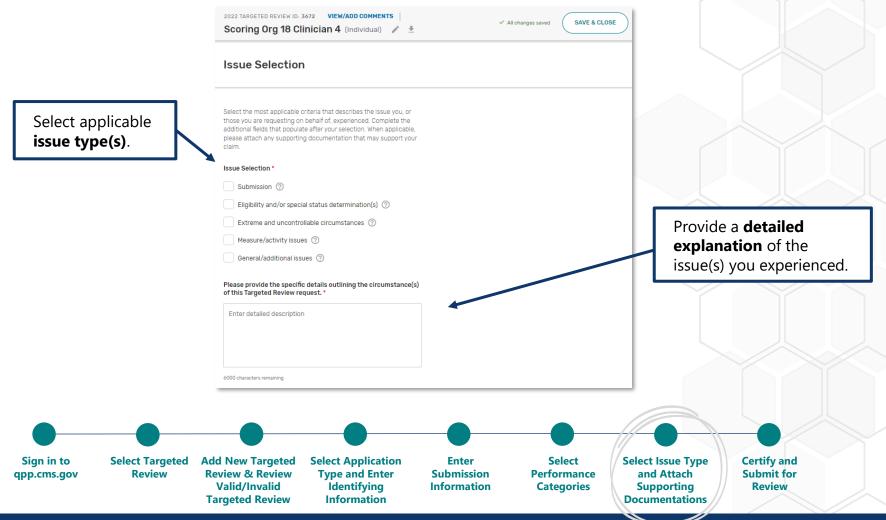




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Step 7a: Issue Type Selection

Select the applicable **issue type(s)** that best describe the issue(s) you identified with your 2024 payment adjustment factor(s) and associated 2022 final performance feedback. Then provide a **detailed explanation** of the issue(s) you identified.





Step 7a: Issue Type Selection (Continued)

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Examples of each issue type are described in the table below. This isn't an exhaustive list.

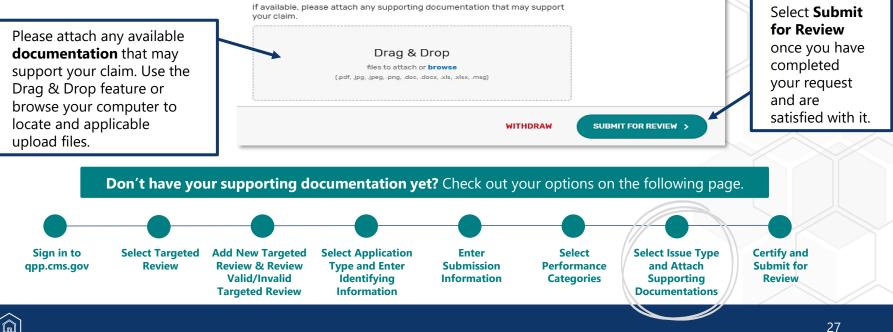
Issue Type	Example			
Submission	Your practice reported to MIPS as a group, and your vendor included the wrong TIN in the file they submitted to MIPS on your behalf.			
Eligibility and/or Special Status Determination(s)	You're a hospital-based MIPS eligible clinician which qualifies you for automatic reweighting of the Promoting Interoperability performance category to 0%. When looking at your 2022 MIPS performance feedback, you see that the Promoting Interoperability performance category wasn't reweighted.			
Extreme and Uncontrollable Circumstances	Your practice was approved for reweighting in all performance categories through a MIPS extreme and uncontrollable circumstances exception application. When looking at your group's 2022 MIPS performance feedback, you see that your group was scored in performance categories for which no data was submitted.			
Measure/Activity Issues	You're a part of a small practice of speech-language pathologists that reported to MIPS as a group. Your group submitted quality performance data on the 3 measures in the Speech-Language Pathology specialty measure set, and the quality performance category score denominator should have been lowered to 30 points, reflecting the 3 quality measures available. When looking at your group's 2022 MIPS performance feedback, you identified that your quality performance category score denominator wasn't lowered.			
General/Additional Issues	You're a MIPS eligible clinician who qualified for quality improvement scoring. When looking at your 2022 MIPS performance feedback, you see that you didn't receive points for improvement scoring in your quality performance category score.			
Sign in to	Select Targeted Add New Targeted Select Application Enter Select Select Issue Type Certify and			
qpp.cms.gov	Review Review & Review Type and Enter Submission Performance and Attach Submit for Valid/Invalid Identifying Information Categories Supporting Review Targeted Review Information Formation Categories Supporting Review			

How to Request a Targeted Review **Step 7b: Attach Supporting Documentation**

Attach your supporting documentation to your Targeted Review application. Then select Submit for Review.

Supporting information may include, but isn't limited to:

- Extracts from the MIPS eligible clinician's EHR.
- Copies of performance data provided to a third party intermediary by the clinician or group.
- Copies of performance data submitted to CMS.
- OPP Service Center case numbers.
- Signed contracts or agreements between a clinician/group and a third party intermediary.
- Proof of your APM participation.
- Partial QP election forms.



You don't need to encrypt your supporting documentation that contains personally identifiable information (PII) or personal health information (PHI) because the targeted review application is within your secure QPP account on the **QPP** website.

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Step 7b: Attach Supporting Documentation (Continued)

We strongly recommend that you attach your supporting documentation to your Targeted Review application as soon as possible.

If your supporting documentation isn't available when you complete the application, you can:

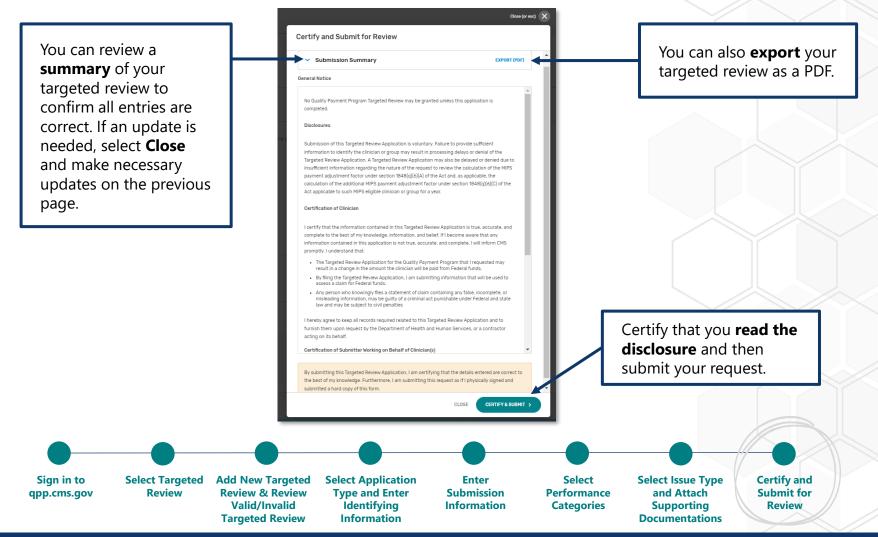
- Option 1: Save your application progress, attach your supporting documentation, and then submit your targeted review.
- **Option 2**: Submit your application and use the <u>Comments</u> function to submit supporting documentation to the reviewer of your request.

Note: If the reviewer of your targeted review requests supporting documentation, you'll have **30 days** to provide the requested documentation, or the targeted review request will be denied.



Step 8: Certify and Submit for Review

Read the disclosure. Then select Certify & Submit.



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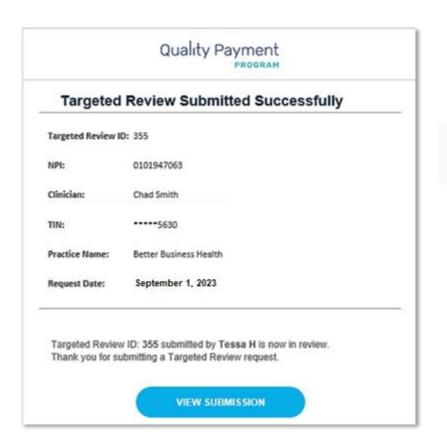
Receive Confirmation Notification

Once your request is complete, you'll be brought back to the **Targeted Review Progress Summary** page. You'll see a **pop-up message** confirming that you successfully submitted your review.

ı'll also receive	Jason M Account Home Registration G Eligibility & Reporting Performance Feedback	Targeted Review Performance Year (PY) 2022	message.
onfirmation ail notifying	APM Incentive Payments APM Incentive Payments Exceptions Application Compared Review	Aug 7.2023 2022 Turgeted Review Submission Period Opens Period Opens	
u that your olication was ccessfully eived.	출 Reports 아이 Manage Access 아 Help and Support	Current Activity Period: 2022 OPP Targeted Review window is open The window for Targeted Review is now open. Please submit your request for review by October 9, 2023 BPH EST. There are 105 days left. VOUR TARGETED REVIEWS (4) Image: The Withdrawn (0) PERFORMANCE YEAR 2022 More Filters v + ADD NEW TARGETED REVIEW	Withdraw your request before it's approved/ denied.
	-→← COLLAPSE	TARGETED REVIEW 10: 3672 Sort by: Application ID v F Scoring Org 18 Clinician 4 (Individual) NPI: 0000217832 VEW DETAILS > Last Updated <1 minute ago by Jason M	Note: You can't reinstate a withdrawr request. You'll need to submit a new request.

Receive Confirmation Notification (Continued)

Example of the email confirmation you receive upon a successful submission.









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View Targeted Review Details

You can monitor all your targeted review requests for the 2022 performance year on the **Targeted Review Progress Summary** page. Select **View Details** for additional information about a specific request.

Sign in to the **<u>QPP website</u>** regularly to stay updated on the status of your requests and any communications you receive from the reviewer.

List of your targeted review requests.	Jason M Account Home Registration Eligibility & Reporting Performance Feedback APM.ncentive Payments	Targeted Review Performance Year (PY) 2022	Select + Add New Targeted Review to create another request.
You can rename your targeted review by clicking the pencil icon .	 È Exceptions \pplication Cargeted Review Reports 승입 Manage Access Help and Support 	Aug 7, 2023 Oct 9, 2023 2022 Targeted Review Submission 2022 Targeted Review Submission Period Opens Period Closes Current Activity Period: 2022 OPP Targeted Review window is open The window for Targeted Review is now open. Please submit your request for review by October 9, 2023 8PM EST. There are 105 days left. YOUR TARGETED REVIEWS (4) Vour TARGETED REVIEWS (4) PERFORMANCE YEAR 2022 ~ More Filters ~ + ADD NEW TARGETED REVIEW	Select View Details to view information on your request and to communicate
You can download a copy of your targeted review by clicking Download PDF .	-→← COLLAPSE	TARGETED REVIEW ID: 3672 NPI: 0000217832 Scoring Org 18 Clinician 4 NPI: 0000217832 (Individua) 	with the reviewer who is evaluating your request.



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Communicate with Reviewer

Select View Details and use the Comments function to communicate with the reviewer and submit supporting documentation for your request.

Important Note : Use the Comments function to communicate with the reviewer about your request instead of contacting the QPP Service Center. You'll receive an email notification if a comment has been added by your reviewer.				regularly to ensure that you're staying current with your targeted review status and communications from your reviewer.	
	Clinician 4 (Individual) 🧪 🛓		CLOSE		
Submission In	formation		Status: Submitted - In Review	Select + Add New to communicate with the	
Individual Details				reviewer of your request.	
Clinician NPI 0000217832	Clinician's Name Scoring Org 18 Clinician 4	Clinician Type Doctor of Medicine	Add Comment		
	upporting documentation	using	BIU⊕ I≡ I≡ E Normal ↔		
Attach Fi	iles.		ATTACH FILES		
				CANCEL SEND	







Frequently Asked Questions

Do I need to submit a targeted review request for each clinician?

In general, you'll complete the targeted review request form at the level at which you (or those on whose behalf you're requesting a targeted review) participated and reported data to QPP for the 2022 performance year. However, under certain circumstances, you'll request a targeted review at a different level. For example, if you're requesting a targeted review of a clinician's MIPS eligibility or eligibility to receive a final score under the APM Performance Pathway (APP).

Example: If you reported for MIPS at the individual level, request an individual targeted review (<u>application type</u> = individual). If you reported at the group level, request a group targeted review (<u>application type</u> = group).

How long do I need to keep documentation regarding my targeted review?

You must retain all documentation associated with your targeted review request for 6 years from the end of the performance year. Therefore, for the 2022 performance year, you must retain your documentation through December 31, 2028.

When can I expect an outcome regarding my request?

We carefully evaluate each request on a case-by-case basis, along with the supporting documentation you provide. The length of time it takes to complete our evaluation will vary depending on the complexity of your request.

We encourage you to sign in to the <u>QPP website</u> regularly to view the status of your targeted review and to stay updated on communications with your reviewer. If you have questions about your request, click **View Details** and communicate with your reviewer via the comments pane.

In addition to monitoring your targeted review on the <u>QPP website</u>, you'll receive emails that confirm we received your targeted review request, that notify you about new comments added to your request, and that notify you about the outcome of your request.







Help, Resources, and Version History

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Where Can I Get Help?

Contact the Quality Payment Program Service Center by email at <u>QPP@cms.hhs.gov</u>, by creating a <u>QPP Service Center ticket</u>, or by phone at 1-866-288-8292 (Monday-Friday, 8 a.m. - 8 p.m. ET).

 People who are deaf or hard of hearing can dial 711 to be connected to a TRS Communications Assistant. Visit the Quality Payment Program <u>website</u> for other <u>help</u> <u>and support</u> information, to learn more about <u>MIPS</u>, and to check out the resources available in the <u>Quality Payment Program</u> <u>Resource Library</u>.



Help, Resources, and Version History

Additional Resources

<u>QPP</u> and the <u>QPP Resource Library</u> house fact sheets, measure specifications, specialty guides, technical guides, user guides, helpful videos, and more.

- 2022 How MIPS Eligibility is Determined
- 2022 Eligibility Determination Periods and Snapshots
- 2022 MIPS Eligibility and Participation User Guide (PDF, 1MB)
- 2022 MIPS Overview Quick Start Guide (PDF, 1MB)
- 2022 APM Performance Pathway (APP) Toolkit (ZIP, 3MB)
- 2022 Traditional MIPS Scoring Guide (PDF, 2MB)

Help, Resources, and Version History

Version History

If we need to update this document, changes will be identified here.



	Date		Description
08/10/2023		Original Posting.	