MIPS Audits Begin

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In June, the Centers for Medicare & Medicaid Services (CMS) announced the commencement of audits for the Merit-based Incentive Payment System (MIPS). The contract was awarded to Guidehouse, formerly known as the US Public Sector of PricewaterhouseCoopers. Guidehouse is transmitting notifications of audits via email or certified mail. The auditors require the requested information be provided within 45 calendar days.

CMS has issued guidance about the requirements to fulfill the audit. For example, the 2017 "Provide Patients Access" criteria, which was a component of the Advancing Care Information category requires: "*Dated report, screenshot, or other information that documents the number of times a patient or patient authorized representative is given access to view, download, or transmit their health information. This could include instructions provided to the patient on how to access their health information including the website address they must visit, the patient's unique and registered username or password, and a record of the patient logging on to show that the patient can use any application of their choice to access the information and meet the API technical specifications.*"

The guidance about the audit requirements, which can be accessed in the Quality Payment Program's online resource library, are titled: "MIPS Data Validation Criteria." The 2017 and 2018 versions have been posted here. CMS advises that documentation about the Merit-based Incentive Payment System should be maintained for six years. It's an opportune time to review this newly released guidance to ensure your documentation strategy for program compliance is responsive to the new guidelines. Should you be audited, you'll be ready.