

Risk Adjustment for EDS & RAPS User Group



August 15, 2019 2:00 p.m. – 3:00 p.m. ET

Session Guidelines

- This is a one hour User Group for MAOs submitting data to the Encounter Data System (EDS) and the Risk Adjustment Processing System (RAPS).
- > We will be conducting a live Q&A session after the presentations today.
- > There remain opportunities to submit questions via the webinar Q&A feature.
- For follow-up questions regarding content of this User Group, submit inquiries to CMS at RiskAdjustment@cms.hhs.gov or EncounterData@cms.hhs.gov.
- ➤ User Group slides and Q&A documents are posted on the CSSC Operations website under Medicare Encounter Data>User Group and Risk Adjustment Processing System>User Group.
- ➤ Please refer to http://tarsc.info for the most up-to-date details regarding training opportunities.
- ➤ User Group Evaluation.

Feedback on the Agenda

- We want to thank everyone who has been submitting specific topics for future User Group Calls. We continue to review these topics as we plan for future agendas.
- We remind you that you have an opportunity to suggest specific topics as part of the evaluation at end of each User Group call.
- Please be as specific as possible when suggesting topics. It helps us better tailor our trainings and webinar development.
- We recognize that we have a broad audience with a wide range of interests and levels of expertise.
- In order to meet these varied interests, we are splitting the agendas for these calls between Program Updates, which will include a variety of topics of varying levels of detail, and Trainings, with Trainings scheduled last.

Technical Assistance

Registration Support Contact TARSC TECHNICAL ASSISTANCE REGISTRATION SERVICE CENTER Information

For questions or issues regarding logistics, registration, or materials, please contact Registration Support.

Phone: 1-800-290-2910

Email: <u>TARegistrations@tarsc.info</u>

When contacting Registration Support, please provide your name, phone number, and email address, along with a detailed description of your issue.

Technical Assistance

Browser Requirements

- JavaScript and cookies enabled
- Java 6 and Java 7 (for web browsers that support Java) enabled
- Cisco WebEx plug-ins enabled for Chrome 32 and later and Firefox 27 and later
- Plug-ins enabled in Safari
- Active X enabled and unblocked for Microsoft Internet Explorer

Recommended Browsers

- Internet Explorer: 8 10 (32-bit/64-bit)
- Mozilla Firefox: Version 10 through the latest release
- Google Chrome: Version 23 through the latest release

Agenda

CMS Updates

- CMS Updates
 - Chart Review Deletes
 - CMS-HCC Model Risk Score Calculation: Rounding
- HPMS Memos
 - Advanced Announcement of September 2019 Encounter Data Software Release Updates
 - Payment Year 2018 Final Reconciliation Update
 - Re-issuing corrected Phase III version 3 MAO-004 Reports for January-April 2019 Submissions
 - 2019 Encounter Data Front-end System Translator Software, Reference Data Updates, and Guidance on Submission of Partially Capitated Encounters
- Frequently Asked Questions
- Live Question and Answer Session

Closing



CMS Updates



Chart Review Deletes

CRR Deletes – PY2016 and PY2017

Identified Issues

- Several MAOs reported that CRR-deletes that were submitted and reported on the MAO-004 reports were not reflected in the PY2016 and PY2017 model runs.
- CMS has researched the issue and has confirmed that these CRR-Deletes were accurately reported on the MAO-004 reports but were not reflected in the PY2016 and PY2017 payment runs.
- Missing diagnosis data from the CRR-Deletes will be addressed in future risk score runs.



CMS-HCC Model Risk Score Calculation: Rounding

Rounding Issue

- CMS received questions describing instances where plan calculated risk scores differ at the third decimal place from CMS calculated risk scores (i.e. those shown on the monthly membership reports (MMR)).
- We discovered a technical issue in the way rounding was applied in the risk scores calculations, and have corrected the issue. As we indicated in prior webinars, when validating risk scores plans should round at the third decimal place after each risk score calculation step.
- The rounding fix will be incorporated in the 2018 reconciliation payment scheduled for later this year, as well as all future runs of other payment years, including the 2019 final reconciliation run.

Risk Score Calculation for PY2020

For PY2020, risk scores will be calculated independently and then blended:

- Risk score calculated using RAPS & FFS using the 2017 CMS-HCC model (weighted at 50%)
 - [(raw risk score from RAPS + FFS diagnoses) / (PY2020 normalization factor for 2017 model)] X (1 PY2020 coding adjustment factor) X 50% = portion of the payment risk score from RAPS & FFS.
- Risk score calculated using ED, RAPS inpatient records & FFS using the 2020
 CMS-HCC model (i.e. Alternative Payment Condition Count model) (weighted at 50%)
 - [(raw risk score from ED + RAPS inpatient records + FFS diagnoses) / (PY2020 normalization factor for 2020 model)] X (1 PY2020 coding adjustment factor) X
 50% = portion of the risk score from ED & FFS.
- Blended risk score = 2017 CMS-HCC model (RAPS & FFS) portion of the risk score
 + 2020 CMS-HCC model (ED, RAPS inpatient, and FFS) portion of the payment risk score.

CMS-HCC Risk Model Example Risk Score Calculation for PY2020

Demographics	2017 CMS-HCC model (RAPS & FFS)	2020 CMS-HCC model (ED, RAPS inpatient & FFS)
Male, Age 82 (aged), FB-Dual, Community	0.816	0.803
Diagnoses & Payment HCC Count Factors:		
Diabetes w/o complications (HCC19)	0.097	0.107
COPD (HCC111)	0.422	0.430
2 Payment HCCs (for the 2020 CMS-HCC model)	N/A	0.000
Total Raw Risk Score (Demographic Factors + Diagnostic factors + Payment HCC Count Factor)	1.335	1.340

Adjustments to Risk Scores

2020 MA Coding Pattern Adjustment:

For PY2020, CMS will implement an MA coding pattern difference adjustment of **5.90%**.

*Note: does not apply to ESRD dialysis, dialysis new enrollee, transplant, or Part D risk scores

2020 Normalization Factors:

Model	Factor
2020 CMS-HCC alternative payment condition count model	1.069
2017 CMS-HCC model*	1.075
2019 & 2020 ESRD dialysis models	1.059
2019 & 2020 ESRD functioning graft models	1.084
2020 RxHCC model	1.043

^{*}Note: The 2017 CMS-HCC model & normalization factor will be used for the calculation of risk scores for PACE organizations.

CMS-HCC Risk Model Example Risk Score Calculation for PY2020

Demographics	2017 CMS-HCC model (RAPS & FFS)	PY2020 CMS-HCC alternative payment condition count model (ED, RAPS & FFS)
Total Raw Risk Score	1.335	1.340
Adjustments:		
Normalization factor	1.335 / 1.075 = 1.24186	1.340 / 1.069 = 1.25351
Round to three decimal places	1.242	1.254
Coding differences (5.90%)	1.242 X (1 – 0.0590) = 1.16872	1.254 X (1 – 0.0590) = 1.18001
Round to three decimal places	1.169	1.180
% of Blended of the Risk Scores	1.169 X 0.50 = 0.5845	1.180 X 0.50 = 0.5900
Round to three decimal places	0.585	0.590
Payment Risk Score	0.585 + 0.590 = 1.175	



HPMS Memos



Advanced Announcement of September 2019 Encounter Data Software Release Updates

Advanced Announcement of September 2019 Encounter Data Software Release Updates

- CMS issued an HPMS memo on July 29, 2019 titled, Advanced Announcement of September 2019 Encounter Data Software Release Updates, to announce upcoming system changes.
- New informational Edit 25010 Modifier Invalid for DOStriggers for professional encounters submitted with a CB modifier if the DOS is on or after July 1, 2019.
- Reject Edit 00805 Deleted Diagnosis Code Not Allowed validations will include linked CRR-delete replacements.
 Currently, edit 00805 rejects unlinked CRR-delete
 replacements. This edit is being extended because CMS has
 observed submission patterns that do not align with current
 guidance as outlined in the Encounter Data Submission and
 Processing Guide Section 2.3.3 No CRR-delete can be
 submitted as a replacement, since the CRR-delete must be
 linked to the record where the respective diagnoses was
 submitted.



Payment Year 2018 Final Reconciliation Update

Payment Year 2018 Final Reconciliation

- CMS issued an HPMS memo on June 25, 2019 titled, Payment Year 2018 Final Reconciliation Update, to announce that CMS will conduct an updated run of PY 2018 final reconciliation to correct processing errors that occurred in the calculation of the encounter data based risk scores.
- These 2018 risk scores will reflect fixes to capture missing diagnoses due to the following issues:
 - 1. Diagnoses submitted on chart review records that were reported on the MAO-004 report but were excluded from risk score calculations
 - 2. Diagnoses submitted on encounter data and chart review records for beneficiaries with Railroad Board (RRB) identifiers that were reported on the MAO-004 report but were excluded from the risk score calculations
- This updated run of PY 2018 final reconciliation will use diagnosis data submitted by the original submission deadline for PY 2018 final reconciliation (i.e., January 31, 2019).
- The diagnoses excluded from the PY 2018 final reconciliation as a result of the processing errors noted above will be included in the encounter data-based risk score, as long as these diagnoses were not replaced or voided by the January 31st deadline.
- CMS anticipates the updated risk scores to be reflected in the October payment.



Re-issuing corrected Phase III version 3 MAO-004 Reports for January-April 2019 Submissions

Phase III version 3 MAO-004 Reports for January-April 2019

- On June 25, 2019, CMS issued an HPMS memo titled, Re-issuing corrected Phase III version 3 MAO-004 Reports for January-April 2019 Submissions.
- The memo announced that CMS has corrected a technical error that caused some service year 2019 records to be omitted from the January April 2019 submissions Phase III Version 3 MAO-004 report (i.e. MAO-004 reports released from February May 2019).
- In order for MAOs to have the latest clean version of the status of their records for the applicable months, the memo explained that CMS is resending all the MAO-004 reports for January April 2019 submissions. There are no changes to the service years 2014 –2018 data in these reports.
- CMS sent the MAO-004 reports for January through April 2019 submissions on July 1, 2019 and sent the May 2019 submissions on July 2, 2019.



2019 Encounter Data Front-end System Translator Software, Reference Data Updates, and Guidance on Submission of Partially Capitated Encounters

2019 Encounter Data Front-end System Translator Software, Reference Data Updates, and Guidance on Submission of Partially Capitated Encounters

- Electronic Data Interchange (EDI) Translator Software Transition- CMS transitioned to a new translator on July 22, 2019. The transition should be transparent to submitters.
- Encounter Data Front-End System Reference Data Updates-CMS has added procedure codes and modifiers and condition codes to the reference data tables of the front-end system
- Submission of Partially Capitated Encounters- CMS has updated guidance on partially capitated encounters



Question:

We are receiving error code 502 on RAPS file submissions. Duplicate error is caused by another MAO submitting the diagnosis clusters. How can we resolve this issue and/or receive credit for the diagnosis clusters?

Answer:

Since the diagnosis was already submitted, it will be included in the risk score. Please note that this error code is used to allow MAOs to minimize their own duplicate submissions. If the error is triggered because another MAO has also submitted the diagnosis cluster, there is no action needed. Please note that while we send monitoring emails when error code 502 passes 5% of submissions, we have not taken the step of conducting compliance in these situations. If CMS changes its approach and determines it will take compliance for high rates of error code 502, we would take into account the submitting organization, as well as provide advance notice to plans.

Question:

I have a question regarding Chart Review Records. If we submit an unlinked Chart Review Record that corresponds to an accepted encounter data (EDR), will we get an error (e.g. duplicate)? If so, is it the same error as a duplicate encounter EDR?

Answer:

The CRR will not be considered a duplicate of a previously submitted and accepted EDR. If the CRR is a copy of previously submitted and accepted CRR, then the CRR will be considered a duplicate. Please refer to the ED and RAPS Webinar Topics Index (<u>user group topics index</u>) for more information on duplicate record processing from prior user group calls.

Question:

How is the EDPS Internal Control Number (ICN) assigned?

Answer:

If an EDR is accepted, the 277CA will provide the Internal Control Number (ICN) assigned to that encounter. The ICN segment of the 277CA for the accepted encounter will be located in 2200D REF segment, REF01=IK and REF02=ICN. The ICN is a unique 13-digit number. For more information please review the Encounter Data Submission and Processing Guide

Question:

How can I tell, when reviewing the MMR, if frailty was applied to a beneficiary's risk score in the payment?

Answer:

When the frailty adjustment is being applied to a beneficiary's risk score, the MMR frailty indicator (field #47) will indicate that the frailty score is included in the risk score and the frailty score used in payment will be included in field #80 on the MMR.

Question:

Can CMS provide the 2018 version of CMS HCC codes mapped to its coefficient values?

Answer:

For each payment year, the corresponding model software and mappings that will be used for the payment year are posted on the risk adjustment webpage (found here). While diagnoses are from the data collection period, the mappings are associated with each respective payment year. For example, the final PY2018 software and mappings are available in the '2018 Model Software/ICD-10 Mappings' folder, and refer to the mappings used for diagnoses submitted from CY2017.

Please also note that for PY2018, CMS did not update the CMS-HCC risk adjustment model. For PY2018, we continued to use the 2017 CMS-HCC model. Since we are continuing to use the 2017 CMS-HCC model for PY2018, the relative factors associated with the demographic and HCC variables that are published in attachment VI of the 2017 Announcement will be used for PY2018.

Question:

Were risk scores on the MMR blended for RAPs and EDS for PY 2017 and 2018, or were they RAPs only?

Answer:

For the initial and midyear 2017 model run, only RAPS/FFS data was used to calculate risk scores. For 2017 final runs, the blended ED-RAPS risk score was used. For the 2018 mid-year and final runs, the ED/FFS based and RAPS/FFS based risk scores were blended. For additional information, please refer to the 2/20/2018 HPMS memo titled, "CORRECTION - Updated Announcement Regarding Encounter Data Deadlines for Payment Years 2016 and 2017 Final Reconciliation." The risk score on the MMR is the risk score used in payment. Please also note that the ED-based MORs will be released when the RAPS-ED risk score blend is applied in payment.

Question:

Is there a report that contains the beneficiaries' calculated demographic factor (i.e. MMR, MOR, etc.)?

Answer:

CMS does not calculate the demographic part of the risk score separately from the diseases-based portion of the risk score. The model output report (MOR) indicates which demographic and disease factors are used to calculate a risk score for a beneficiary. The MMR provides information on a beneficiary's status, which determines which risk score is used in payment for a given month.

For more information about the MMR and MOR layouts, please refer to the Plan Communications User Guide Main Guide (<a href="https://www.cms.gov/Research-Statistics-Data-and-Systems/CMS-Information-Data-And-Systems/CMS-Information-D

Technology/mapdhelpdesk/Plan Communications User Guide.html).



Live Question and Answer Session

Logistics

Audio Features

- Dial "* #" (star-pound) to enter the question queue at any time
- If selected, your name will be announced and the operator will unmute your telephone line.
- Dial "* #" (star-pound) to withdraw from the queue
- Dial "0" on your phone to reach the operator
- For questions regarding logistics or registration, please contact the TARSC Registration Support Team

Phone: 800-290-2910

Email: TARegistrations@tarsc.info



Closing

Resources

Resource	Resource Link
Centers for Medicare & Medicaid Services (CMS)	http://www.cms.gov/
Customer Support and Service Center (CSSC) Operations	http://www.csscoperations.com csscoperations@palmettogba.com
EDS Inbox	encounterdata@cms.hhs.gov
Risk Adjustment Mailbox	riskadjustment@cms.hhs.gov
Technical Assistance Registration Service Center (TARSC)	http://www.tarsc.info/
Washington Publishing Company	http://www.wpc- edi.com/content/view/817/1
Medicare Advantage and Prescription Drug Plans Plan Communications User Guide (PCUG)	http://www.cms.gov/Research- Statistics-Data-and-Systems/CMS- Information- Technology/mapdhelpdesk/Plan Comm unications User Guide.html

Resources (continued)

Resource	Link
RAPS Error Code Listing and RAPS- FERAS Error Code Lookup	http://www.csscoperations.com/internet/cs sc3.nsf/docsCat/CSSC~CSSC%20Operations~ Risk%20Adjustment%20Processing%20Syste m~Edits?open&expand=1&navmenu=Risk^A djustment^Processing^System
CMS 5010 Edit Spreadsheet	https://www.cms.gov/Regulations-and- Guidance/Guidance/Transmittals/
EDFES Edit Code Lookup	https://apps.csscoperations.com/errorcode/ EDFS ErrorCodeLookup
EDPS Error Code Look-up Tool	http://www.csscoperations.com/internet/cs sc3.nsf/DocsCat/CSSC~CSSC%20Operations~ Medicare%20Encounter%20Data~Edits~97JL 942432?open&navmenu=Medicare^Encoun ter^Data

Commonly Used Acronyms

Acronym	Definition
ВНТ	Beginning Hierarchical Transaction
CEM	Common Edits and Enhancements Module
CFR	Code of Federal Regulations
DOS	Date(s) of Service
EDDPPS	Encounter Data DME Processing and Pricing Sub-System
EDFES	Encounter Data Front-End System
EDIPPS	Encounter Data Institutional Processing and Pricing Sub-System
EDPPPS	Encounter Data Professional Processing and Pricing Sub-System
EDPS	Encounter Data Processing System
EDS	Encounter Data System
EODS	Encounter Operational Data Store
FERAS	Front-End Risk Adjustment System
FFS	Fee-for-Service

Commonly Used Acronyms (continued)

Acronym	Definition
FTP	File Transfer Protocol
HCC	Hierarchical Condition Category
НН	Home Health
HIPPS	Health Insurance Prospective Payment System
ICN	Internal Control Number
MAOs	Medicare Advantage Organizations
MARx	Medicare Advantage Prescription Drug System
MMR	Monthly Membership Report
MOR	Monthly Output Report
PY	Payment Year
RAPS	Risk Adjustment Processing System
RAS	Risk Adjustment System
SNF	Skilled Nursing Facility
TPS	Third Party Submitter

Evaluation

A formal request for evaluation feedback will display at the conclusion of this session.

We are interested in learning how we can make the User Groups better for you. As part of this evaluation, we solicit Risk Adjustment topic(s) of interest for future User Groups. Topics can be technical or policy-related, related to the models or data submission, updates on various topics or trainings.

Please take a moment to note any feedback you wish to give concerning this session.

Your Feedback is important.



Thank You!

Stay Connected with CMS

