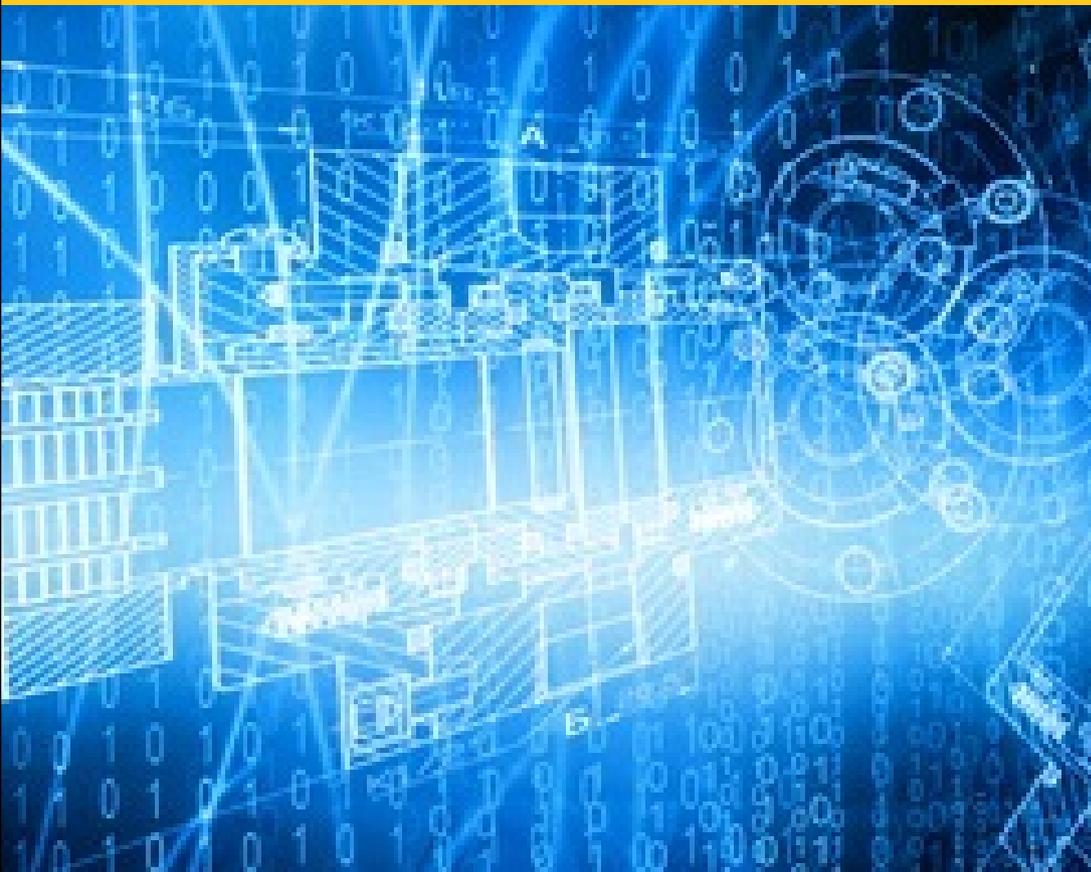# Risk Adjustment for EDS & RAPS User Group

February 22, 2018

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.

- 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.

Agenda

- **CMS Updates**
  - HPMS Memos
    - Extension of PY2017 Risk Adjustment Processing System (RAPS) Final Reconciliation Data Submission Deadlines
    - Encounter Data Deadlines for Payment Years 2016 and 2017 Final Reconciliation
    - 2018 Risk Score Runs for Purposes of Overpayment Recovery
    - Payment Year 2013 Overpayment Recovery
  - Medicare Beneficiary Identifier Questions & Answers
- **Q&A Session**
  - January User Group Frequently Asked Questions
  - Live Question and Answer Session
- **Closing**

CMS Updates

HPMS Memos

Extension of PY2017 Risk Adjustment Processing System (RAPS) Final Reconciliation Data Submission Deadline

- On January 26, 2018, CMS released an HPMS memo titled, *Extension of PY2017 Risk Adjustment Processing System (RAPS) Final Reconciliation Data Submission Deadline*.

- This memo extended the RAPS data submission deadline for PY2017 Final reconciliation by 3 months due the impact extreme weather events had on risk adjustment data collection and submission.

- The <u>RAPS</u> PY2017 Final Reconciliation deadline will now be **Friday, May 4, 2018**.

- CMS will run an interim final reconciliation using RAPS and encounter data submitted as of the original deadline – Wednesday, January 31, 2018.

- This PY2017 Interim Final Reconciliation will be included in the May 2018 payment.

- The RAPS submissions between January 31st and May 4th will be included in the Final PY2017 run we conduct later in 2018.

Encounter Data Deadlines for Payment Years 2016 and 2017 Final Reconciliation

- On February 20, 2018, CMS released a HPMS memo titled, *CORRECTION- Updated Announcement Regarding Encounter Data Deadlines for Payment Years 2016 and 2017 Final Reconciliation*

- This memo provides encounter data submission deadlines for payment years 2016 and 2017 and anticipated payment months.

- We expect that the revised and improved MAO-004 reports released in April 2018 and the extended deadlines will provide better information for plans to use in submitting encounter data and will support more accurate payments.

- Payment Year 2016
  - The second interim run of the PY2016 risk score will use RAPS data submitted as of January 31, 2017, RAPS deletes submitted through April 2, 2018, and encounter data submitted as of April 2, 2018.
    - Anticipated payment month: July 2018 payment
  - The final PY2016 risk scores will use diagnoses submitted to RAPS as of January 31, 2017, RAPS deletes submitted through August 2, 2018, and diagnoses from encounter data submitted by August 2, 2018.
    - Anticipated payment month: November 2018 payment
  - As the final risk adjustment data submission deadline for PY2016 is August 2nd, deletes submitted prior to this date are not overpayments as defined in Section 1128J(d) of the Social Security Act and 42 CFR §422.326.
    - Therefore, data should be corrected in the appropriate systems, but you do not need to create an overpayment report in the RAOR module in HPMS.

Encounter Data Deadlines for Payment Years 2016 and 2017 Final Reconciliation (continued)

- <u>Payment Year 2017</u>
  - The interim final run will use RAPS and encounter data submitted by the existing deadline of January 31, 2018.
    - Anticipated payment month: May 2018
  - The final PY2017 reconciliation run will use diagnoses submitted to RAPS as of May 4, 2018, RAPS deletes submitted through September 14, 2018, and diagnoses from encounter data submitted as of September 14, 2018.
    - Anticipated payment month: April 2019
  - As the final risk adjustment data submission deadline for PY2017 is September 14, 2018, deletes submitted prior to this date are not overpayments as defined in Section 1128J(d) of the Social Security Act and 42 CFR §422.326.
    - Therefore, data should be corrected in the appropriate systems, but you do not need to create an overpayment report in the RAOR module in HPMS.

Encounter Data Deadlines for Payment Years 2016 and 2017 Final Reconciliation (continued)

Payment Year	Encounter Data Deadline	RAPS Deadline	RAPS Delete Deadline for the respective risk score run	Are RAPS Deletes submitted by the "RAPS Delete Deadline" Considered Overpayments?	Anticipated Month of Payment
PY 2015- Rerun/update	February 1, 2016	February 22, 2016	June 7, 2018	Yes	September 2018
PY 2016 – 2nd Interim Final	April 2, 2018	January 31, 2017	April 2, 2018	No	July 2018
PY2016 – Final Reconciliation	August 2, 2018	January 31, 2017	August 2, 2018	No	November 2018
PY 2017 – Interim Final	January 31, 2018	January 31, 2018	January 31, 2018	No	May 2018
PY 2017 – Final Reconciliation	September 14, 2018	May 4, 2018	September 14, 2018	No	April 2019

2018 Risk Score Runs for Purposes of Overpayment Recovery

- On February 9, 2018, CMS released the HPMS memo, *2018 Risk Score Reruns for Purposes of Overpayment Recovery.*

- This annual memo announces the payment years that will have reruns of their risk scores for overpayment recovery in the coming calendar year, in this case in 2018.

- CMS will notify plans at least 30 days in advance of the deadline for submitting deletes for each risk score run.

- These runs do not affect plan obligations to report and return overpayments within 60 days of identification of the overpayments.

2018 Risk Score Runs for Purposes of Overpayment Recovery (continued)

Payment Year	Dates of Service*
2011	2010
2012	2011
2013	2012
2015**	2014

*Risk scores applied to a payment year are calculated using diagnoses from dates of service in the previous calendar year.
**For the CY2018 rerun of PY2015, only RAPS deletes will be included. We will also include updated Phase III v 3 filtering code for the diagnoses from encounter data.

Payment Year 2013 Overpayment Recovery

- On February 9, 2018, CMS released an HPMS memo, *Payment Year (PY) 2013 Overpayment Recovery.*

- This memo announced that for this year's PY 2013 risk score rerun, the deadline to submit all PY 2013 (2012 dates of service) deletions to the Risk Adjustment Processing System (RAPS) is Friday, March 16, 2018.

- All deletions received by the deadline will be included in the risk score rerun and subsequent overpayment recovery.

Medicare Beneficiary Identifier Questions & Answers

Medicare Beneficiary Identifier (MBI)

- During the January User Group call we discussed the new Medicare Beneficiary Identifier (MBI). The MBI will replace the SSN-based Health Insurance Claim Number (HICN) on replacement and new Medicare cards which will be issued to all beneficiaries starting in April 2018.

- Please access the January User Group slides on www.csscoperations.com for more information on the MBI.

- We received several questions about the MBI during the January call. The following slides address these questions.

EDS & RAPS MBI Q&As

- **Should Medicare Advantage Organizations (MAOs) submit deletes to the Risk Adjustment Processing System (RAPS) using the beneficiary identifier from the original "add" submission?**

  Yes

- **Is this guidance only for the Medicare Beneficiary Identifier (MBI) transition period?**

  This guidance is applicable for the time being. CMS will notify plans when there are changes.

- **After the MBI transition, what beneficiary identifier should MAOs use for overpayment submissions since overpayment submissions have a six-year look-back period?**

  CMS will provide guidance in the future.

EDS & RAPS MBI Q&As (continued)

- **Is the RAPS error 503, "Beneficiary MBI Number has changed according to CMS Records; use correct MBI Number for future submissions," an informational error code?**

   Yes, this is an information error, and will not reject the submission.

- **What are the reasons a beneficiary's MBI may change?**

   A beneficiary's MBI may change for a number of reasons including identify theft.

- **If an MAO receives RAPS error code 503, "Beneficiary MBI Number has changed according to CMS Records; use correct MBI Number for future submissions," how can the MAO get the correct MBI?**

   The new MBI will be returned to the plan on the RAPS report. It will be returned in the same field as the HICN currently is returned in when an updated HICN is identified.

EDS & RAPS MBI Q&As (continued)

- **Will the Model Output Report (MOR) contain MBIs for new beneficiaries joining Medicare after April 2018?**

  MOR reports will contain the MBIs for all beneficiaries starting 01/01/2020. Prior to that, newly enrolled beneficiaries who would have only an MBI would not normally appear on the MOR. This is because new enrollees – those beneficiaries who receive new enrollee risk scores in payment – do not appear on the MOR. These beneficiaries will not be "full risk" – having an HCC-based risk score – until 2020.

- **Will CMS hold a testing period for RAPS submissions containing MBIs?**

  No. However, CMS will provide technical assistance as needed during and after the RAPS extended transition period.

EDS & RAPS MBI Q&As (continued)

- **Will the Health Insurance Claim Number (HICN) and MBI crosswalk be a monthly file or a one-time file? If it is a monthly file, will it be a delta file or a full replacement file? Will each plan only receive data for that specific plan?**

   MARx will make a monthly crosswalk data file at the MAO/PDP Contract level. Every month during the transition period, MARx will send out the file to help MAOs and Part D sponsors determine or match their beneficiaries' HICNs and MBIs. In March 2018, Plans will get an "initial" (one-time only) HICN to MBI crosswalk file for past (back to 2006) and present membership. After the initial crosswalk file, a monthly file will be sent to Plans with any new enrollment changes.

- **CMS stated that for EDS the duplicate logic will not differentiate between the MBI and the HICN, Does this also apply to RAPS?**

   Yes, the duplicate logic for both RAPS and EDS will not differentiate between the HICN and the MBI. Please note that, in the event of a resubmission of a cluster with identical attributes except HICN v. MBI, RAPS will produce informational Error Code 502: DIAGNOSIS CLUSTER WAS ACCEPTED BUT NOT STORED. A DIAGNOSIS CLUSTER WITH THE SAME ATTRIBUTES IS ALREADY STORED IN THE RAPS DATABASE will be returned.

January User Group
Frequently Asked Questions

Frequently Asked Questions

Question:

Will the Payment Year (PY) 2017 Final Reconciliation contain a MOR for the Encounter Data System (EDS)?

Answer:

Yes, there will be separate RAPS-based and encounter data-based MOR Record Types for both the interim final and final PY2017 payment.

Frequently Asked Questions

Question:

Why do MAOs receive MORs monthly if CMS only runs the risk adjustment model three (3) times a year?

Answer:

While each beneficiary's data is only updated with each model run, the Monthly MORs are sent for each payment month for the beneficiaries who are enrolled in the contract for the payment month. The MORs for those payment months where the risk scores are changing – initial payment, the mid-year update, and final – will reflect the updated HCC information for your enrolled beneficiaries.

Frequently Asked Questions

Question:

When will CMS publish the ICD-10 to HCC mappings for the 2019 CMS-HCC Models?

Answer:

The mappings for the models proposed in the 2019 Advance Notice are posted in the '2019 Proposed Mappings' folder on the CMS website at https://www.cms.gov/Medicare/Health-Plans/MedicareAdvtgSpecRateStats/Risk-Adjustors.html.

Frequently Asked Questions

Question:

Why does the Monthly Membership Report (MMR) contain adjustments that change the value for Part A and Part B entitlement?

Answer:

Below are some reasons why the MMR may contain adjustments that change the value for Part A and B entitlement:

Sometimes beneficiaries lose entitlement to Part A or enrollment in Part B, and these changes may retroactively affect plan payments. For example, a beneficiary may be dis-enrolled from Part B if premiums were not paid, and this would affect payments, resulting in both retroactive payment adjustments and cessation of future payments. If this beneficiary's Part B enrollment is restored in the future, the beneficiary could then establish a new enrollment period in the plan, and plan payments could resume beginning with the re-enrollment date and onwards. Payment adjustments will be made retroactively to reflect Part A and B status.

For additional information on Part A and Part B eligibility and enrollment, please reference https://www.cms.gov/Medicare/Eligibility-and-Enrollment/OrigMedicarePartABEligEnrol/index.html.

Frequently Asked Questions

Question:

How will MAOs differentiate between a MOR based on RAPS and one based on EDS?

Answer:

There are separate record types for HCCs based on diagnoses from RAPS and HCCs based on diagnoses from Encounter Data. For additional information about the different record types, please reference the 8/17/17 HPMS memo "Changes to Payment Year (PY) 2016 Final Model Output Report (MOR)" for information on identifying HCCs from the RAPS and encounter data in the MORs for PY2016 final payment. The layouts for the Model Output Reports (MOR) are located in the Plan Communication User Guide (PCUG) at:

https://www.cms.gov/Research-Statistics-Data-and-Systems/CMS-Information Technology/mapdhelpdesk/Plan_Communications_User_Guide.html.

Please refer to the Table of Contents for the appropriate MOR layout.

Frequently Asked Questions

Question:

Does CMS provide a list of all CPT Codes, not just the ones meeting the criteria for risk adjustment?

Answer:

The American Medical Association produces CPT Codes. CMS produces Healthcare Common Procedure Coding System (HCPCS) code set. Changes to the HCPCS code set are posted to the HCPCS Quarterly Update website: https://www.cms.gov/Medicare/Coding/HCPCSReleaseCodeSets/HCPCS-Quarterly-Update.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_Communications_User_Guide.html

Resources *(continued)*

Resource	Link
RAPS Error Code Listing and RAPS-FERAS Error Code Lookup	http://www.csscoperations.com/internet/cssc3.nsf/docsCat/CSSC~CSSC%20Operations~Risk%20Adjustment%20Processing%20System~Edits?open&expand=1&navmenu=Risk^Adjustment^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/cssc3.nsf/DocsCat/CSSC~CSSC%20Operations~Medicare%20Encounter%20Data~Edits~97JL942432?open&navmenu=Medicare^Encounter^Data||||

Commonly Used Acronyms

Acronym	Definition
BHT	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
HH	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