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# Encounter Data 101 User Group Q&A Documentation

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## Questions and Answers – August 7, 2014 Live Session

### Edits and Reports

**Q1: Does the EDFES generate an Incidence Ratio Rate (IRR) Report in conjunction with the EDFES TA1, 999, and 277CA Acknowledgement Reports?**

A1: No, the IRR reports are not used for encounter data. The EDFES generates the TA1, 999, and 277CA Acknowledgement Reports only.

**Q2: Is there an update on the expected release of the MAO-004 Risk Filtering Report?**

A2: We are now in the process of developing the MAO-004 file record layout and our proposal for filtering encounter data for risk score calculation eligibility. We plan to solicit plan comments on both before finalizing our filtering approach.

**Q3: If an MAO receives a 999R Acknowledgement Report, will the MAO also receive a 277CA Acknowledgment Report and an MAO-001 Encounter Data Duplicates Report?**

A3: If an MAO receives an EDFES 999R Acknowledgement Report, the MAO must correct all encounter errors in the file and resubmit the files. The EDFES will reprocess the encounter file and generate a 277CA Acknowledgement Report, indicating the file has been accepted by the EDFES. Once the file is transmitted to and processed through the EDPS for additional editing, the MAO will receive an MAO-002 Encounter Data Processing Status Report identifying all accepted and rejected encounters. The MAO will only receive an MAO-001 Encounter Data Duplicates Report if the encounter file contained reject error code 98325 “Service Line(s) Duplicated”.

**Q4: Are MAOs required to correct and resubmit the entire file when receiving a 999R Acknowledgement Report?**

A4: When receiving a 999 Acknowledgement report that contains reject errors, MAOs should correct only the encounter(s) that have received the reject errors; however, to ensure the encounter file processes through the EDFES, the MAO must resubmit the entire file containing the corrected information for the previously rejected transaction.

**Q5: What is the response time for MAOs to receive reports for submission of test files?**

A5: When submitting Tier II test files, MAOs should expect a response time of 24 hours for EDFES Acknowledgement Reports, and seven (7) days for EDPS MAO-002 Processing Status Reports.

**Q6: Will the EDFES TIBCO translator generate an edit for missing or invalid Health Insurance Prospective Payment System (HIPPS) codes?**

A6: CMS has not defined a date for the implementation of the EDFES TIBCO translator. Once the implementation date is finalized, CMS will notify the industry and provide guidance regarding encounter processing and editing.

### *Timely Filing*

**Q7: Has CMS implemented the 13-month timely filing rule?**

A7: Yes, the 13-month timely filing rule was implemented in July 2014. MAOs that do not submit all encounters within 13 months of the original DOS will receive informational error code 00190-Encounter Beyond Timely Filing Req. MAOs that do not submit adjustment encounters within 30 days of the adjustment adjudication date will receive informational error code 00770-Adjustment Beyond Timely Filing Req. CMS will notify the industry prior to changing the disposition of these error codes to 'rejected'.

**Q8: Does the timely filing guidance of 13 months from the encounter's DOS apply to adjustment encounters?**

A8. No, the timely filing guidance of 13 months from the encounter's DOS applies to original encounter submissions only. For adjustment encounters, timely filing guidance requires that MAOs submit adjustment encounters within 30 days of the adjustment encounter's adjudication date. The timely filing rules for all encounter types validates based on 'through' DOS.

### *End-to-End Certification*

**Q9: If an end-to-end certified MAO needs to submit encounter data for a Program of All-Inclusive Care for the Elderly (PACE) organization, is the MAO required to obtain a separate Submitter ID and separate end-to-end certification for the PACE organization?**

A9: If an MAO is already end-to-end certified and needs to submit encounter data for a PACE organization, that MAO is not required to obtain a separate Submitter ID or resubmit for End-to-End Certification.

**Q10: What are the timelines/deadlines for End-to-End Certification and Tier II testing?**

A10: MAOs are encouraged to complete End-to-End Certification within the first quarter of the year; however, MAOs that have not yet completed certification requirements should complete the certification process as soon as possible. CMS has published the 2014 Test Case Specifications on the CSSC Operations website to assist MAOs with certification. The 2014 Test Case Specifications are published at <http://www.csscoperations.com>. MAOs may also contact CSSC Operations directly, at 877-534-2772, for assistance.

Tier II testing is optional. MAOs that are end-to-end certified are able to submit encounter data to the Tier II test environment at any time.

Please note: If an MAO is submitting an adjustment encounter to the Tier II test environment, the adjustment encounter must be linked to an original encounter previously submitted to the Tier II test environment.

**Submission**

**Q11: Are there additional requirements for a Third Party Submitter (TPS) to submit encounters on behalf of an MAO other than completing a Submitter Application?**

A11: TPS organizations submitting encounter data on behalf of an MAO must complete and submit:

1. An Electronic Data Interchange (EDI) Agreement signed by an authorized agent of the organization. The EDI Agreement must be signed and returned to CSSC Operations.
2. The Encounter Data Online Submitter Application.
3. The Encounter Data Connect:Direct Application (if applicable).

The authorizing MAO must submit a Letter of Authorization notifying CMS that the MAO has authorized the TPS to submit encounter data on their behalf.

The letter of authorization must be submitted on the MAO's company letterhead and should include the applicable lines of business for which the TPS will submit data (i.e., Risk Adjustment, Encounter Data, and/or Prescription Drug Event).

**Q12: Should Medicare Advantage Organizations (MAOs) continue to submit encounters for 2012 dates of service (DOS), even though these will generate an informational edit because the data are late?**

A12: Yes, MAOs should submit all encounters with DOS on or after January 1, 2012. CMS requests that MAOs continue to submit any accumulated encounters until further notice.

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**Q13: When will the Risk Adjustment Processing System (RAPS) fully transition to the Encounter Data System (EDS)?**

A13: Both RAPS and EDS will be used in payment year 2015, per Section N. of the 2015 Final Announcement, available at <http://www.cms.gov/Medicare/Health-Plans/MedicareAdvtgSpecRateStats/Announcements-and-Documents.html>. CMS will announce, in advance, a full transition to the EDS.