



**MEDICARE-MEDICAID COORDINATION OFFICE**

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**DATE:** March 25, 2016

**TO:** Medicare-Medicaid Plans in Illinois, Massachusetts, Michigan, New York (FIDA), Ohio, South Carolina, Texas, and Virginia

**FROM:** Sharon Donovan, Director, Program Alignment Group  
Medicare-Medicaid Coordination Office

**SUBJECT:** Completing Submission of CY2014-15 Encounter Data by Medicare-Medicaid Plans (MMPs)

Several demonstrations under the Medicare-Medicaid capitated financial alignment model have been underway for more than two years, and CMS is at the threshold of gaining greater insight into trends, and potentially early successes, of the demonstration, using encounter data submitted by the Medicare-Medicaid Plans (MMPs). Submissions of any remaining encounters with dates of service in 2014-2015 are vital not only for the external evaluation of these demonstrations, but also for MMPs, as encounter data are factored into risk adjustment and the quality withhold analysis.

As specified in the Medicare-Medicaid Capitated Financial Alignment Model Quality Withhold Technical Notes (DY1) released in June 2014 [[www.cms.gov/Medicare-Medicaid-Coordination/Medicare-and-Medicaid-Coordination/Medicare-Medicaid-Coordination-Office/FinancialAlignmentInitiative/Downloads/DY1QualityWithholdGuidance060614.pdf](http://www.cms.gov/Medicare-Medicaid-Coordination/Medicare-and-Medicaid-Coordination/Medicare-Medicaid-Coordination-Office/FinancialAlignmentInitiative/Downloads/DY1QualityWithholdGuidance060614.pdf)], encounters must be submitted within 180 days of the date of service. However, we recognize that submitting any remaining older encounter data would put an MMP at risk of not meeting that quality withhold criterion in calendar year 2016.

Given the importance to CMS and MMPs of complete submission of older encounter data, CMS is providing a one-time grace period in which older encounter data may be submitted without being factored into the quality withhold 180 day timeliness requirement. Encounters with dates of service from the start of the demonstration through September 30, 2015, and that are submitted by July 1, 2016, will not be subject to the 180-day timeliness requirement and thus not risk incurring penalties for late submission of these encounters. CMS will not use encounters with dates of service on or before September 30, 2015 in calculating quality withhold performance for calendar year 2016. However, MMCO will take compliance action for MMPs failing to submit the older encounter data by July 1, 2016. Note that this grace period will not retroactively change an MMP's quality withhold status for calendar year 2015.

MMPs should also continue to submit encounter data with more recent dates of service, as the 180 day requirement will continue to apply for encounter claims with dates of service from October 1, 2015 forward, and be needed to support demonstration evaluation throughout the demonstration.

If your plan is facing a delay or backlog in encounter data submissions for a subset of service categories or overall, please notify Goldy Austen ([Goldy.Austen@cms.hhs.gov](mailto:Goldy.Austen@cms.hhs.gov)) or Joe Del Pilar ([joseph.delpilar@cms.hhs.gov](mailto:joseph.delpilar@cms.hhs.gov)) in the Medicare-Medicaid Coordination Office.