

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
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**CENTER FOR MEDICARE
MEDICARE PLAN PAYMENT GROUP**

DATE: June 1, 2015

TO: All Medicare Advantage Organizations (MAOs), PACE Organizations, Cost Plans, and certain Demonstrations

FROM: Cheri Rice, Director
Medicare Plan Payment Group

SUBJECT: Encounter Data Submission Timing Guidance

This memo serves as a reminder and clarification of various submission guidelines to all organizations submitting encounter data.

1. **Submission of records before the risk adjustment deadline.** All risk adjustment data submission deadlines apply to encounter data submissions for payment purposes. Starting with 2014 dates of service, diagnoses submitted on encounter data records (EDRs) that meet risk adjustment criteria will be used in calculating risk scores. CMS will only use acceptable 2014 diagnoses from EDRs submitted by the final risk adjustment deadline for payment year 2015.

The submission of encounter data, CMS processing, and edit reporting in the Encounter Data Processing System (EDPS) requires more time than the similar processes implemented in the Risk Adjustment Processing System (RAPS). As with RAPS, organizations that submit close to the risk adjustment submission deadline may not receive their edit reports until after the deadline. To provide sufficient time for organizations to receive edit reports and submit corrected EDRs before the deadline, CMS strongly encourages organizations to submit EDRs (original, replacement/adjustment, and chart review EDRs) as soon as possible and to follow existing guidance on the frequency and timeliness of submissions.

2. **Frequency.** Submitting organizations must submit all encounters to the Encounter Data System (EDS) using established guidelines based on contract size reported in HPMS (as of February of the contract year):

Number of Medicare Enrollees	Minimum Submission Frequency
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Greater than 100,000	Weekly
50,000 – 100,000	Bi-weekly
Less than 50,000	Monthly

As a best practice, MAOs are encouraged to submit encounters daily.

3. **Timely Filing Guidelines.** Submitting organizations are also encouraged to follow the timely filing guidelines by submitting all encounters within 13 months of the date of service. CMS provides an informational edit when an encounter is submitted more than 13 months after the date of service.

For questions regarding any of the guidance in this memo, please email encounterdata@cms.hhs.gov and use the subject: HPMS Memo- Encounter Data Submission Timing Guidance.

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