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DATE: May 29, 2019

TO: All Medicare Advantage, Cost, PACE, and Demonstration Organizations Systems Staff

FROM: Jennifer R. Shapiro, Acting Director, Medicare Plan Payment Group

SUBJECT: Request for Input – Risk Adjustment Reports - Model Output Report (MOR) and MAO-004 Report

As part of our continual efforts to improve and update our processes, CMS is seeking stakeholder input on two risk adjustment reports that provide valuable information to Medicare Advantage organizations (MAOs) on the data used to calculate risk scores:

- 1. The Encounter Data Diagnosis Eligible for Risk Adjustment Report (MAO-004):**
The MAO-004 report informs MAOs of the risk adjustment eligibility of diagnosis data submitted on accepted Encounter Data Records (EDRs) and Chart Review Records (CRRs). Diagnoses from accepted EDRs and CRRs are designated as “allowed” or “disallowed” for risk adjustment after they are processed through the encounter data diagnosis filtering logic. The MAO-004 reports are produced at the contract-level on a monthly basis from data submitted by MAOs to CMS in the immediately preceding month.
- 2. The Model Output Report (MOR):** The MOR displays the Hierarchical Condition Categories (HCCs & RxHCCs) that are used by the Risk Adjustment System (RAS) to calculate risk adjustment factors for each beneficiary enrolled in an MAO. The report displays the HCC or RxHCCs in the CMS-HCC and RxHCC models, the applicable beneficiary demographic variables (e.g. Age-Sex Group), and the disabled and disease interactions triggered for an enrollee in calculating the risk score. The MOR also provides detailed beneficiary level information on enrollee identifiers (e.g. beneficiary identifier, name, date of birth). The MORs are distributed in the data file format (MOFD) and the record file format (MOFR) on a monthly basis and are updated for the initial and midyear payment runs, and a final MOR is generated for the final reconciliation payment run.

The complexity and volume of data included in these reports has evolved and grown in line with growth in the Medicare Advantage program and the inclusion of MA Encounter Data in risk score calculations. CMS’ goal is to provide clear, accurate, timely, and streamlined reports in a user-friendly format.

To that end, CMS is seeking feedback for each report on:

- (a) Content: Which data fields are essential and used on a regular basis? Should the reports contain the most recent activity (incremental) or provide a cumulative view of the data? Does the volume of data that is provided present any challenges? Additionally, specifics on how the reports are used (i.e., the report is joined to an internal database using the member ID (HICN/MBI) vs. specific beneficiaries are identified in our data analysis processes and looked up in the report) may also be helpful as we consider options.
- (b) Frequency and Timing: Please provide your thoughts on a suitable frequency for reporting. For example, the MORs are provided monthly and for each model run, including Initial, Mid-Year, and Final. Are the reports needed on a monthly basis? How often are the MAO-004 reports needed? We are aware that some MAOs would like to receive the MAO-004 report more often. We are interested to get input from all MAOs for planning purposes. Currently the MAO-004 reports are released around the 22nd of the month. The MORs are released around the 1st of the month. If providing suggestions for changing the frequency, please explain the need for the reports at the suggested frequency.
- (c) Format and Layout: CMS is interested in your thoughts on report formats and layouts that would facilitate use of these reports. For example, the MOR has fields for every Sex and Age Group, but could have one or two fields similar to the Monthly Membership Report (MMR). The MMR has a Gender Code field and a Risk Adjustment Age Group. Similarly, there are indicators for each of the HCCs and each time an HCC is added, a new layout is released to accommodate the change in report length. The MOR is provided in report format and flat file format. Are both formats used? Suggestions can be submitted by modifying the existing report layouts, drafting a sample layout, or just sending a written description of the desired changes.

For reference, the file layouts can be found in the Plan Communication User Guide for Medicare Advantage Prescription Drug Plans (Version 13.0):

<https://www.cms.gov/Research-Statistics-Data-and-Systems/CMS-Information-Technology/mapdhelpdesk/Downloads/PCUG-Main-Guide-v130-February-28-2019.pdf>

Section 7.1 for the MOR Data file format

Section 7.4 for the MAO-004 file format

- (d) Mode of Assessment and/or Dissemination: Currently, CMS disseminates the flat files of these reports via the MAOs' designated Electronic File Transfer (EFT) mailbox and places achieved copies on the Medicare Advantage Prescription Drug (MARx) User Interface (UI) for access. CMS understands that whenever corrected reports are sent to plans within a short time, it can be a challenge due to the large report volume. Therefore, CMS is seeking potential options in this as well. For example, a self-service portal where organizations or users can log in, filter the needed report(s) by some criteria and

download them as data is refreshed or needed, etc. MAOs can send suggestions of sample screenshots, views, or a written description of potential options.

- (e) Lead time: In the event that reports are modified, how much lead time would be required for stakeholders to modify systems to accommodate changes?

CMS will use stakeholder input to inform the development of proposed layouts for the MOR and MAO-004 reports and seek additional feedback in the future.

Please submit feedback to the encounterdata@cms.hhs.gov mailbox by June 26, 2019. Please specify “Request for Input – Risk Adjustment Reports – Model Output Report (MOR) and MAO-004 Report” in the subject line of the email.