



2006



Regional Training

*Risk Adjustment
Data Basic Training*



*February 16, 2006
Baltimore, MD*



Introduction

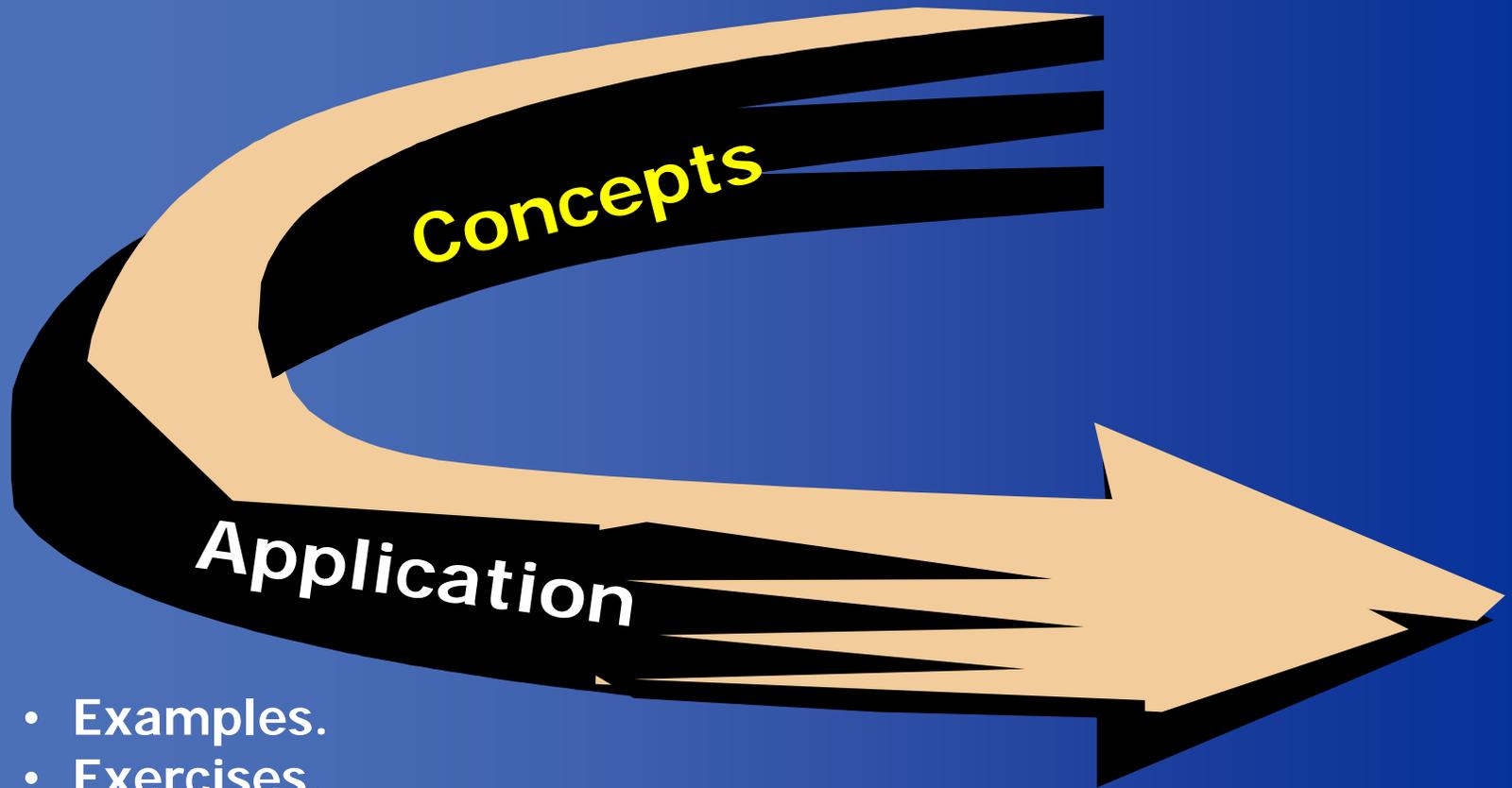
Presented By:
Aspen Systems Corporation



Purpose

- To provide participants *new* to risk adjustment the support needed to improve the quality and quantity of risk adjustment data collected and submitted in accordance with CMS requirements.

Training Format



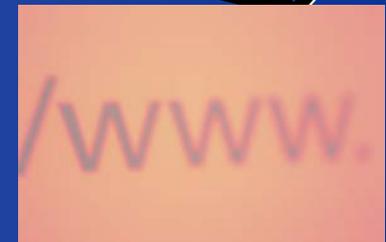
- Examples.
- Exercises.
- Group Participation.
- Interactive.

Your Participation Makes the Difference



Training Tools

- Participant Guide
 - CD with slides
- Job Aids
- www.csscooperations.com
- Panel of Experts





Audience

- **New staff.**
- **New organizations.**
- **Staff unable to attend previous training.**
- **Third Party submitters.**



Agenda

| TIME | TOPIC |
|---------------------|-----------------------------|
| 8:00 AM – 8:30 AM | Introduction |
| 8:30 AM – 9:30 AM | Risk Adjustment Methodology |
| 9:30 AM – 10:00 AM | Process Overview |
| 10:00 AM – 10:15 AM | BREAK |
| 10:15 AM – 11:00 AM | Data Collection |
| 11:00 AM – 12:00 PM | Data Submission |
| 12:00 PM – 1:00 PM | LUNCH ON YOUR OWN |
| 1:00 PM – 1:45 PM | Edits |
| 1:45 PM – 2:45 PM | Reports |
| 2:45 PM – 3:00 PM | BREAK |
| 3:00 PM – 4:00 PM | Data Validation |
| 4:00 PM – 5:00 PM | Verifying Risk Scores |
| 5:00 PM – 5:30 PM | Question & Answer |
| 5:30 PM | ADJOURN |



Objectives

- Understand the CMS-HCC model and apply the payment methodology.
- Identify the components of the risk adjustment process and describe the requirements for data collection.
- Determine the process for submitting data to CMS.
- Interpret editing rules and error resolution.



Objectives (continued)

- Identify and interpret the reports available for risk adjustment monitoring.
- Understand the data validation approach under the CMS-HCC model.
- Understand how to verify risk scores.



Introducing the Team

CMS



Palmetto
(CSSC)

Aspen Systems Corporation



Risk Adjustment Methodology

Presented by:
Centers for Medicare & Medicaid Services

2006 Risk Adjustment Data Basic Training



Purpose

- To explain risk adjustment under
 - Medicare Advantage.
 - Medicare Part D (Prescription Drug).

2006 Risk Adjustment Data Basic Training



Objectives

2006 Risk Adjustment Data Basic Training

- Review the history of risk adjustment.
- Understand the basics of risk adjustment as applied to bidding and payment.
- Review characteristics of CMS-HCC risk adjustment model.
- Describe how to calculate risk scores.



Objectives (continued)

2006 Risk Adjustment Data Basic Training

- Discuss implementation of frailty adjuster and its possible future application.
- Review upcoming CMS-HCC model enhancements.
- Understand how the ESRD model operates.
- Describe the Part D risk adjustment model.



Risk Adjustment History

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- The Balanced Budget Act of 1997 (BBA) required CMS to implement risk adjustment for M+C organizations in 2000 with inpatient diagnosis data.
- BBA also mandated that payments consider frailty of enrollees in the Program for All-Inclusive Care for the Elderly (PACE).
- CMS implemented the Principal Inpatient Diagnostic Cost Group (PIP-DCG) model in 2000 using 10 percent blended payment.



Risk Adjustment History

(continued)

2006 Risk Adjustment Data Basic Training

- The Benefits Improvement and Protections Act of 2000 (BIPA) required additional data in risk adjustment model beginning in 2004.
- CMS implemented the CMS-Hierarchical Condition Category (HCC) Model that includes hospital and ambulatory data at 30% blended payment.
 - Model balanced reducing plan data burden with implementing clinically sound model.



Risk Adjustment History (continued)

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- In 2004, CMS implemented frailty adjuster for enrollees of PACE and certain demonstrations.
- In 2005, CMS implemented the End-Stage Renal Disease (ESRD) model for ESRD MA enrollees.
- In 2006, CMS implemented a risk adjustment model for the new Medicare prescription drug benefit.



Risk Adjustment History

(continued)

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- The Medicare Prescription Drug, Improvement, and Modernization Act of 2003 (MMA) created new program called Medicare Advantage (MA) Program.
 - Replaced Medicare+Choice program.
 - Retained many of M+C provisions.
 - Created drug benefit program in 2006 with drug card program during interim.



Risk Adjustment History

(continued)

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- The MMA included risk adjustment as a key component of the bidding and payment processes for both the MA program and the prescription drug benefit.
- In 2006, CMS implemented risk adjustment model for new Medicare prescription drug benefit.

MMA in 2006

- Created new Medicare drug benefit as Part D
 - Two types of sponsors:
 - Stand alone prescription drug plan (PDP).
 - MA organization providing a basic drug benefit (MA-PD)
 - Each MA organization must provide basic drug coverage under one of its plans for each service area it covers.
 - Established reinsurance option and risk corridors to limit risk for participating plans.
 - 34 Part D regions announced in December 2004.



Medicare Advantage in 2006

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- TITLE II of the MMA
 - Replaced Adjusted Community Rate (ACR) proposal with bidding process for MA organizations.
 - Maintained local plan options.
 - HMOs, PFFS plans, MSAs, PSOs.
 - Created MA regional plans offering a PPO option.
 - 26 regions announced in December 2004.



MA Organization Bid and Review Process

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- The bid is based on amount MA organization determines it will cost to provide its 1.0 benefit package to MA enrollees.
- CMS reviews MA organization bids for their actuarial soundness—ensure that bid reflects costs of providing proposed benefit package.



Overlap of Payment Methods in Titles I and II

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- MA organizations intending to offer MA plans and/or drug benefits in 2006 had submitted bids for their basic, and if applicable, supplemental benefit packages.
- Benchmarks were created for local and/or regional plans for bid-benchmark comparison.
- Monthly capitated payments made based on plan's bid and risk adjusted for health status.



What is Risk Adjustment?

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- Risk adjustment is a method used to adjust payment based on the health status and demographic characteristics of an enrollee.
- Allows for comparison of beneficiary to the average Medicare beneficiary.
- Risk adjustment for Medicare is built on FFS data sets.



Risk Adjuster Basics

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- Risk adjustment appropriately adjusts payment for the characteristics of the enrolled population.
- In the context of MAs/PDPs, risk adjustment used to standardize bids and applied to payment.
- It allows direct comparison of bids based on populations with different health status and other characteristics.



Risk Adjuster Basics

(continued)

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- What is a risk score? It is the expected cost of the enrollee normalized to the expected average cost for the population.
- Expected cost is derived from enrollee characteristics:
 - Enrollees' characteristics are assigned risk factors that are added to produce a total risk factor.
- The risk factors are essentially relative weights developed from a prediction model.



CMS Risk Adjustment Models

- Currently CMS has three risk adjustment models:
 - The CMS-HCC model for Part A/B.
 - Community and Long Term Institutional.
 - The ESRD model for beneficiaries with ESRD.
 - Dialysis, Transplant, and Post-Transplant.
 - The Part D drug model.
 - Base Model +.
 - Low Income or Long Term Institutional Multipliers.
- These models share a common basic structure.
- Separate scores produced by each model, then applied to the appropriate payment.



CMS-Hierarchical Condition Category (HCC) Model

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- Model categorizes diagnosis codes into disease groups that include conditions which are clinically related with similar cost implications.
- Prospective-diagnoses from base year used to predict payments for following year.
- In the Part C Model separate community and institutional models account for higher treatment costs of similarly-ill, community residents.



CMS-HCC Model (continued)

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- Currently, the CMS-HCC model uses 70 disease categories for community and for long term institutional residents.
- Site neutral payment.
- Diagnosis sources are inpatient and outpatient hospital and physician settings.
- Model is additive.



Demographic Factors in Risk Adjustment

- Age
 - Payment for year based on enrollee age as of February 1st.
- Sex
- Medicaid Status.
 - Under CMS-HCC model, applies only to community residents (including short term institutional).
 - Defined as one month of Medicaid eligibility during data collection period.
 - New enrollees use concurrent Medicaid.



Demographic Factors in Risk Adjustment (continued)

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- Disabled Status
 - Applied to community residents.
 - Factors for disabled <65 years-old.
 - Factors for disabled and Medicaid.
- Original Reason for Entitlement
 - Factors based on age and sex.
 - >65 years old and originally entitled to Medicare due to disability.



Disease Groups/HCCs

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- Most body systems covered by diseases in model.
- Each disease group has an associated coefficient.
- Model heavily influenced by costs associated with chronic diseases.
 - Major Medicare costs are captured.

Disease Hierarchies

- Payment based on most severe manifestation of disease when less severe manifestation also present.
- Purposes:
 - Diagnoses are clinically related and ranked by cost.
 - Takes into account the costs of lower cost diseases reducing need for coding proliferation.



Frailty Adjuster - Improvement of CMS-HCC Model

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- Created to predict Medicare expenditures of functionally impaired not explained by CMS-HCC model.
- Applied in conjunction with CMS-HCC model.
- Applied to PACE organizations and certain demonstrations.



Frailty Adjuster (continued)

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- Adjuster based on relative frailty of organization in terms of number of functional limitations.
- Functional limitations measured by activities of daily living (ADLs) – from survey results.
- CMS calculates organization-level frailty score based on ADLs of those >55 in the community.



RANGE OF FRAILTY SCORES IN 2005

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| FRAILTY PLAN | RANGE OF FRAILTY SCORES |
|----------------------|-------------------------|
| PACE | .39 - .79 |
| S/HMOs | .07 - .14 |
| WPP | .39 - .53 |
| MSHO | .19 - .70 |
| SCO* | .30 - .30 |
| * Estimated for 2005 | |



Implications of Frailty Adjuster

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- Risk and frailty account for variation in health status of PACE enrollees for which risk and frailty adjustment accounts.
- For MA organizations, addition of frailty factor may improve payment accuracy.
- Frailty adjustment lowers risk scores for individuals with 0 ADLs and raises scores for all other ADL categories.



Frailty Adjuster Development (continued)

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- Policy decision needs to consider multiple factors:
 - Overall technical assessment of frailty factors and the county ratebook adjustments.
 - Impact on accuracy of and payments for all plans.
 - Particular impact on “special needs” plans.



CMS-HCC Model Enhancements

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- CMS is analyzing additional diagnoses to add to current model to improve payment accuracy.
- CMS will share impacts of changes in model with the MA industry.

ESRD Model

- New model using risk adjustment for ESRD enrollees in MA organizations and demonstrations was applied in 2005.
- Model addresses unique cost considerations of ESRD population.



ESRD Implementation

- BIPA mandated ESRD model reflects methodology used for S/HMO ESRD demonstration.
- ESRD model was implemented at 100% of payment in 2005.

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ESRD Model-Three Parts

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- Based on treatment costs for ESRD enrollees over time. Three subparts in model:
 - Dialysis - recalibrated CMS-HCC model without kidney disease diagnoses- contains 67 disease groups.
 - Transplant - higher payment amount for 3 months.
 - Reflects higher costs during and after transplant.
 - Functioning Graft - regular CMS-HCC model used, but includes factor to account for immunosuppressive drugs and added intensity of care.

ESRD Model (continued)

- Dialysis Model-HCCs with different coefficients.
 - Multiplied by statewide ESRD ratebook.
- Transplant Model-Costs for transplant month + next 2 months.
 - National relative factor created by dividing monthly transplant cost by national average costs for dialysis.
 - Highest factor is for month 1 where most transplant costs occur.
 - Payment for 3-months multiplied by statewide dialysis ratebook.



New Enrollees and ESRD Model

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- Applies to new enrollees with less than 12 months of data.
- Dialysis and functioning graft subgroups will have new enrollee factors for enrollees with no risk scores available.
- No new enrollee factors for transplant subgroup.



Model Comparisons of Coefficients

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| | Community | Institutional | Dialysis |
|---|-----------|---------------|----------|
| Metastatic Cancer and Acute Leukemia HCC 7 | 1.464 | 0.540 | 0.161 |
| Diabetes with acute complications HCC 17 | 0.391 | 0.612 | 0.106 |
| Major Depression HCC 55 | 0.431 | 0.221 | 0.116 |
| Age-Sex Factor for 69 year old male | 0.346 | 1.450 | 0.775 |
| Age-Sex Factor for 88 year old female | 0.665 | 0.880 | 0.919 |



Part D Risk Adjustment

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- The drug risk adjustment model (RxHCC) shares most of the characteristics of the CMS-HCC model (prospective, additive, hierarchical, and demographic new enrollee model).
 - The key differences:
 - RxHCC model designed to predict plan liability for prescription drugs under the Medicare drug benefit rather than Medicare Part A/B costs.
 - Different diseases predict drug costs than Part A/B costs.
 - Incremental costs of low income (LI) and long term institutional (LTI) beneficiaries are multipliers to the base RxHCC model score.



Part D Risk Adjustment (continued)

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- The development of the RxHCC model is a iterative process—disease groups disassembled into smaller subgroups, then reassembled to allow empirical estimation of costs and incorporate clinical judgment.
- Explanatory power of the RxHCC model is on par with other drug models ($R^2=.25$ for plan liability); is higher than similar Part A/B models because drug costs are more stable.
- Normalization is done on the entire Medicare FFS population.
- Average projected plan liability is \approx \$993.



Part D Risk Adjustment (continued)

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- Model includes 113 coefficients:
 - 84 disease coefficients.
 - 24 age-sex adjustments.
 - 3 interactions between age and disease.
 - and 2 sex-age-originally disabled status interactions.
- Hierarchies cover 11 conditions.



Low Income and Long Term Institutional

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- The Part D model includes incremental factors for beneficiaries who are low-income subsidy eligible (LIS) or long term institutional (LTI).
- The factors are multipliers that are applied that the basic Part D risk adjustment factor predicted by the model.
- If a beneficiary is LTI they can not also receive the low income factor.

Low Income and Long Term Institutional Multipliers

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| Long Term Institutional | | Low Income | |
|-------------------------|------------------|---------------------------------------|--|
| Aged ≥ 65 | Disabled < 65 | Group 1 – Full subsidy eligible | Group 2 – Partial subsidy eligible (15%) |
| 1.08 | 1.21 | 1.08 | 1.05 |



Risk Adjuster Example

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| <u>Coded Characteristic</u> | <u>Payment Increment</u> | <u>Liability Model Relative Factor</u> |
|------------------------------------|--------------------------|--|
| Female, age 76 | \$ 431 | .434 |
| Diabetes, w. complications | 255 | .258 |
| <i>Diabetes, uncomplicated</i> | <i>188</i> | <i>.190</i> |
| High cholesterol | 162 | .163 |
| Congestive Heart Failure | 248 | .251 |
| Osteoporosis | 110 | .115 |
| <hr/> | | |
| Total Annual Pred. Spending | \$1,206 | 1.22 |

For implementation, predicted dollars are divided by national mean (~ \$993) to create relative factors that are multiplied by the bid



Risk Adjuster Example

(continued)

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- Step 1 - derive base risk score – 1.22.
- Step 2 - multiply by either LI or LTI factor if they apply for the payment month.
- Full subsidy eligible (group 1): risk score = base risk score (1.22)* 1.08 = 1.318.
- Long term institutional (aged): risk score = base risk score (1.22) * 1.08 = 1.318.



Risk Adjusted Payments

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- For 2006, the CMS-HCC and ESRD models remain unchanged from 2005 and the Part D model is new.
- For calculating RA scores for payment diagnoses from either MA or from Medicare FFS.
- New Enrollee model used for people new to Medicare with insufficient data for risk adjustment. This model is based solely on demographics.
- Appeal rights—only if we did not follow our published methodology.



Simplified Example Illustrating Use of Risk Adjustment in Bidding

- Plan derived costs for benefit package = \$1,000.
- Plan estimated risk score for population = 1.25.
- Standardized plan bid = \$800 ($\$1,000/1.25$).
- Plan actual risk score based on enrollment = 1.5.
- Risk adjusted plan payment = standardized plan bid * actual risk score = \$1,200 ($\$800*1.5$)



Part D - Direct Subsidy Payments

- Monthly direct subsidy made at the individual level.
- Direct subsidy = (Standardized Bid * Individual Risk Score) – Beneficiary Basic Premium.
- Sum for all beneficiaries enrolled equals monthly organizational payment.

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Conclusions

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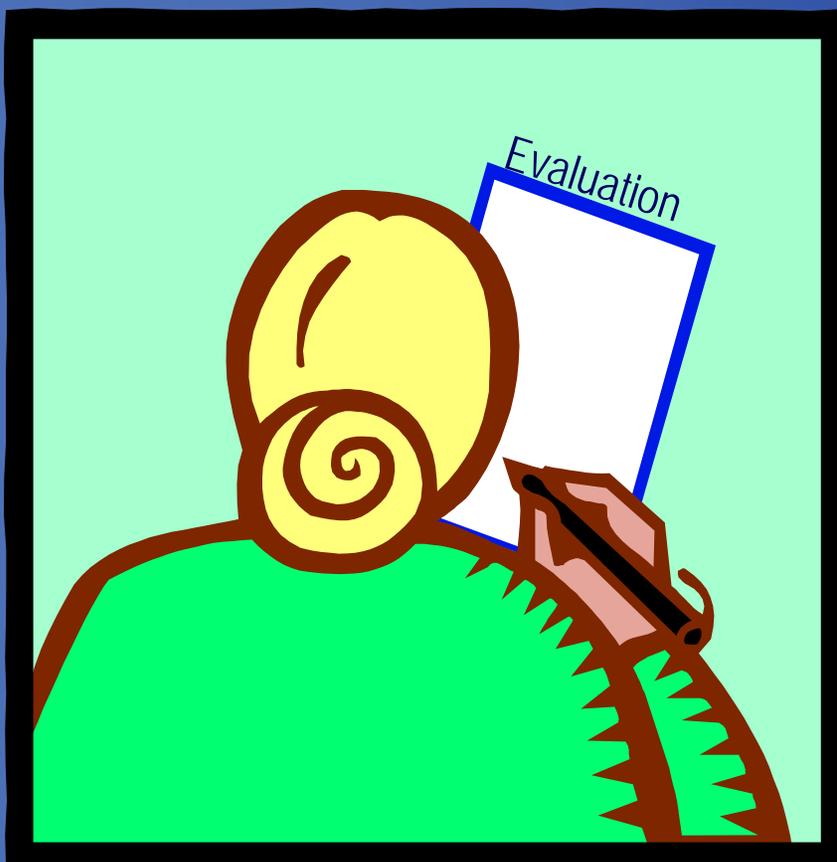
- Consistency: CMS approach uses risk adjustment for all types of plans.
- Flexibility: Four pronged approach (HCC, frailty, ESRD, RxHCC) provides flexibility to ensure accurate payments to MA plans and PDPs; provides ability to develop other models as needed.
- Accuracy: Improves our ability to pay correctly for both high and low cost persons.



Information on Risk Adjustment Models and Risk Scores

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- The Part D risk adjustment model is available at http://www.cms.hhs.gov/DrugCoverageClaimsData/02_RxClaims_PaymentRiskAdjustment.asp.
- Contact: Sean Creighton M.Sc.
(Sean.Creighton@cms.hhs.gov).
Thomas Kornfield MPP
(Thomas.Kornfield@cms.hhs.gov).



Please take a moment to complete the evaluation form for the Risk Adjustment Methodology Module.

Thank You!



Process Overview

Presented by:
Aspen Systems Corporation



Purpose

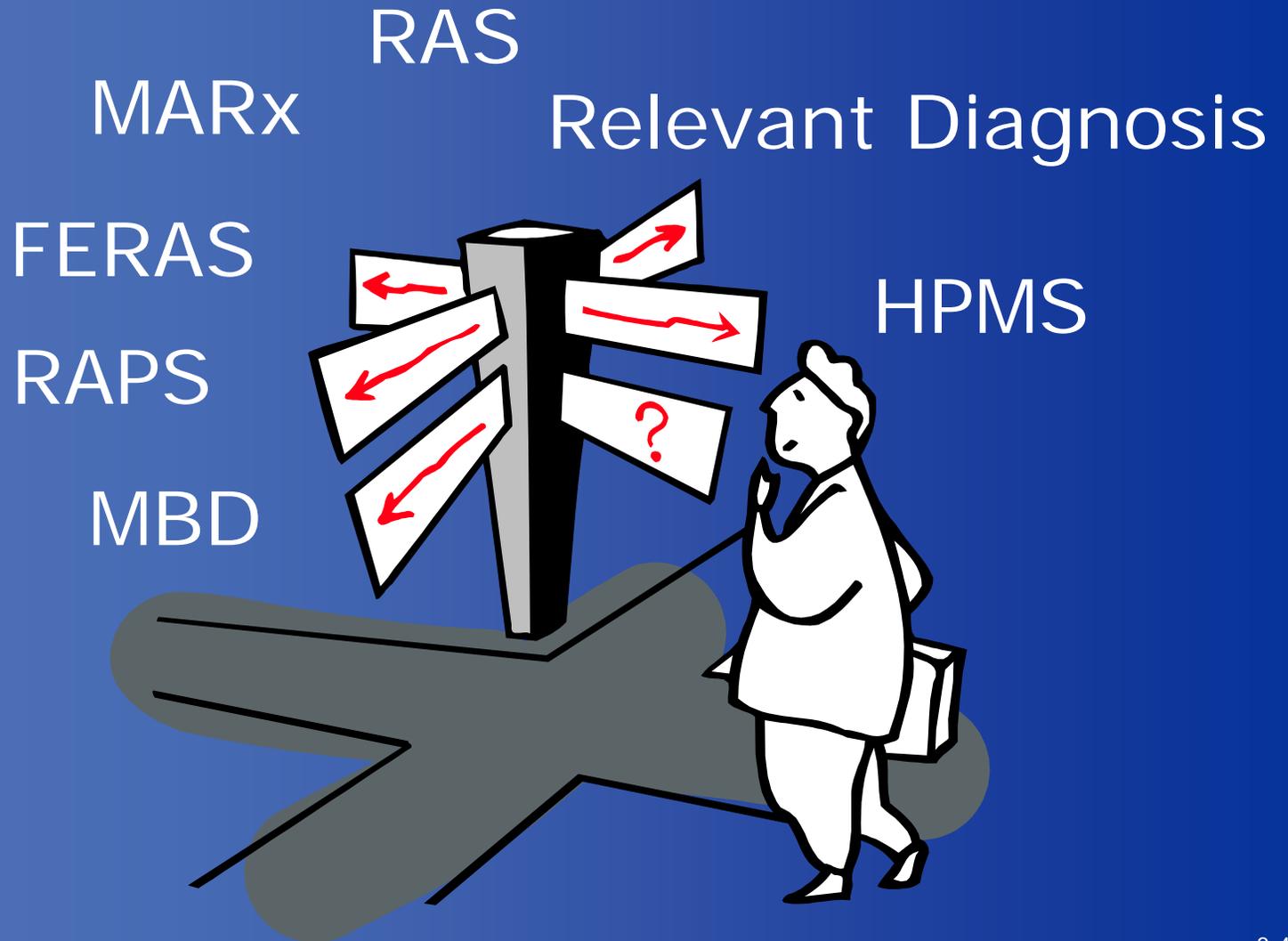
- To provide participants with important terms, key resources, and schedule information that establish the foundation for this training.



Objectives

- Identify common risk adjustment terminology.
- Interpret key components of the risk adjustment process.
- Interpret the risk adjustment schedule.
- Identify CMS outreach efforts available to organizations.

Common Terms

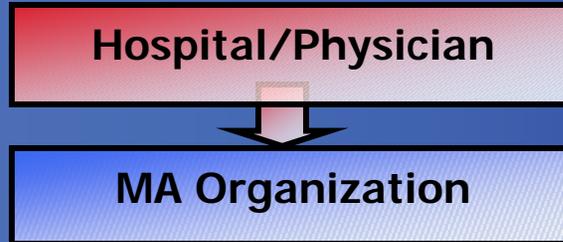




Risk Adjustment Data Requirements

- HIC number
- Diagnosis code
- Provider type
- Service from date
- Service through date

Data Collection

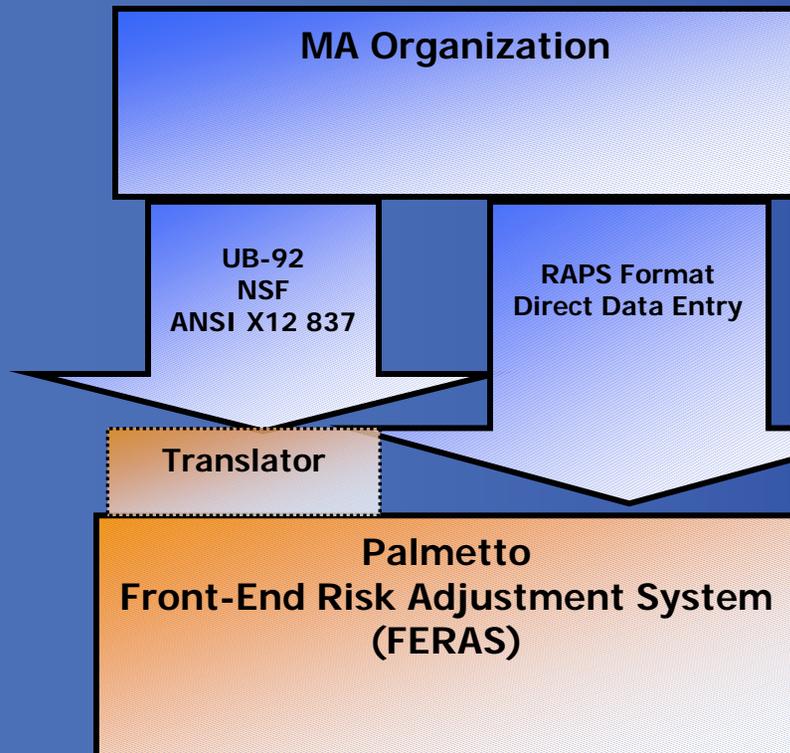


Minimum Data Set

- ✓ HIC number
- ✓ Diagnosis code
- ✓ Service from and through dates
- ✓ Provider type

- Formats
 - UB-92
 - HCFA 1500
 - NSF
 - ANSI 837
 - Superbill
 - RAPS format

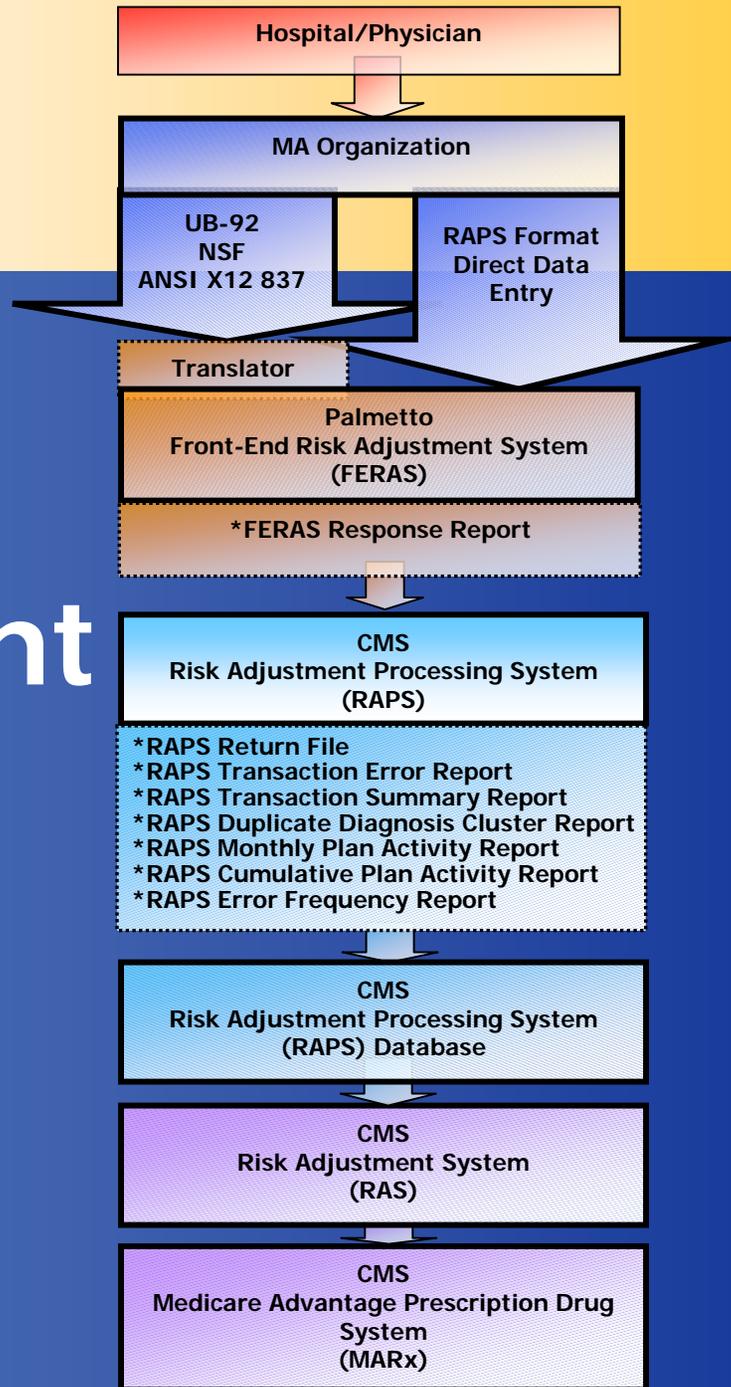
Data Submission



- Formats
 - UB-92
 - NSF
 - ANSI 837
 - RAPS format
 - Direct Data Entry



Risk Adjustment Process



* These reports/files are returned to the MA organization.



Submission Schedule

| CY | Dates of Service | Initial Submission Deadline | First Payment Date | Final Submission Deadline |
|----|-------------------|-----------------------------|--------------------|---------------------------|
| 05 | 1/1/04 – 12/31/04 | 3/4/05 | 7/1/05 | 5/15/06 |
| 06 | 7/1/04 – 06/30/05 | 9/2/05 | 1/1/06 | N/A* |
| 06 | 1/1/05 – 12/31/05 | 3/3/06 | 7/1/06 | 1/31/07 |
| 07 | 7/1/05 – 06/30/06 | 9/1/06 | 1/1/07 | N/A* |
| 07 | 1/1/06 – 12/31/06 | 3/2/07 | 7/1/07 | 1/31/08 |

* With elimination of the payment lag, the final submission deadline (reconciliation) is May 15 in 2006 and then becomes January 31 from 2007 forward. There is no longer a September 30 deadline for reconciliation.



Training and Support



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Getting Started Video
Training

Regional Training

2005 Regional Training
Video



Summary

- Reviewed common risk adjustment terminology.
- Introduced key components of the risk adjustment process.
- Reviewed risk adjustment schedule.
- Identified outreach and training available to organizations.



Please take a moment to complete the evaluation form for the Process Overview Module.

Thank You!



Data Collection

Presented by:
Aspen Systems Corporation

Purpose

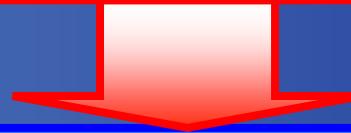
- To provide MA systems personnel with the risk adjustment data collection requirements critical for accurate risk adjusted payment for their organization.

Objectives

- Identify data elements for risk adjustment.
- Identify three sources of risk adjustment data.
- Identify data collection formats available to MA organizations.
- Discuss considerations for methods of data collection.
- Discuss HIPAA transaction standards.

Data Collection

DATA COLLECTION



DATA SUBMISSION

Minimum Risk Adjustment Data Elements

HIC Number

Diagnosis Code

From Date

Through Date

Provider Type

Health Insurance Claim Number

| |
|-----------------------|
| HIC Number |
| Diagnosis Code |
| From Date |
| Through Date |
| Provider Type |

- HIC numbers are beneficiary identification numbers.
- HIC numbers are issued by CMS and the RRB.

ICD-9-CM Diagnosis Codes

HIC Number

Diagnosis Code

From Date

Through Date

Provider Type

- 3-5 digit code describing clinical reason for treatment
- Drives risk scores, which drive reimbursement

Service From and Through Dates

HIC Number

Diagnosis Code

From Date

Through Date

Provider Type

- Defines when a beneficiary received treatment

Provider Type

| |
|-----------------------|
| HIC Number |
| Diagnosis Code |
| From Date |
| Through Date |
| Provider Type |

- Hospital inpatient
- Hospital outpatient
- Physician

Hospital Inpatient Data

- Provided by a hospital or facility where a patient is admitted for at least an overnight stay.
- SNFs or hospital inpatient swing bed components are not covered facilities.
- Determine if a provider is a covered facility.



Hospital Outpatient Data

- Therapeutic and rehabilitation services for sick or injured persons who do not require hospitalization or institutionalization.
- Data collected must be from hospital outpatient departments.
- Determine if a provider is a covered facility.



Acceptable or Not?

| In Network? | * Provider Number? | Acceptable? |
|-------------|-------------------------------|-------------------|
| Yes | Yes | Yes, Submit |
| Yes | No | No, Do not submit |
| No | Yes No, but on DoD/VA list | Yes, Submit |
| No | No & not on DoD/VA list | Call CMS |

* Provider number within the acceptable range.



Medicare Provider Number

33 U 020

State where hospital/facility is located

Type of facility

Unique to the facility

NOTE: The presence of a **U, W, Y, Z, 5, or 6** as the third character represents SNF. This should not be submitted.

Physician Data



- Services provided by a physician or clinical specialist during a face-to-face visit.
- All diagnoses that are in the risk adjustment model must be collected from network, as well as non-network, physicians.

Exercise



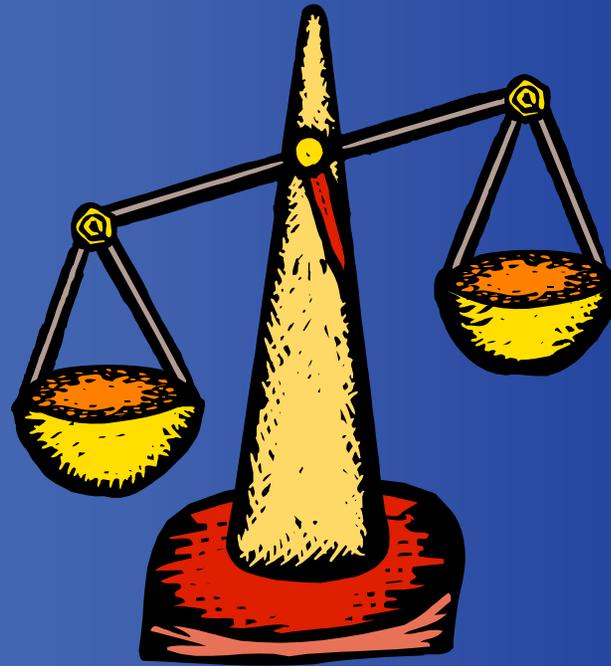


Data Collection Formats

- HCFA 1500
- NSF
- UB-92
- ANSI x12 837
- RAPS format
- Superbill

Factors Affecting Data Collection Method

Data
Collection
Method



Business
Needs

Contractual Relationships



HIPAA and Risk Adjustment Rules

Encounter from
provider/physician to
MA organization



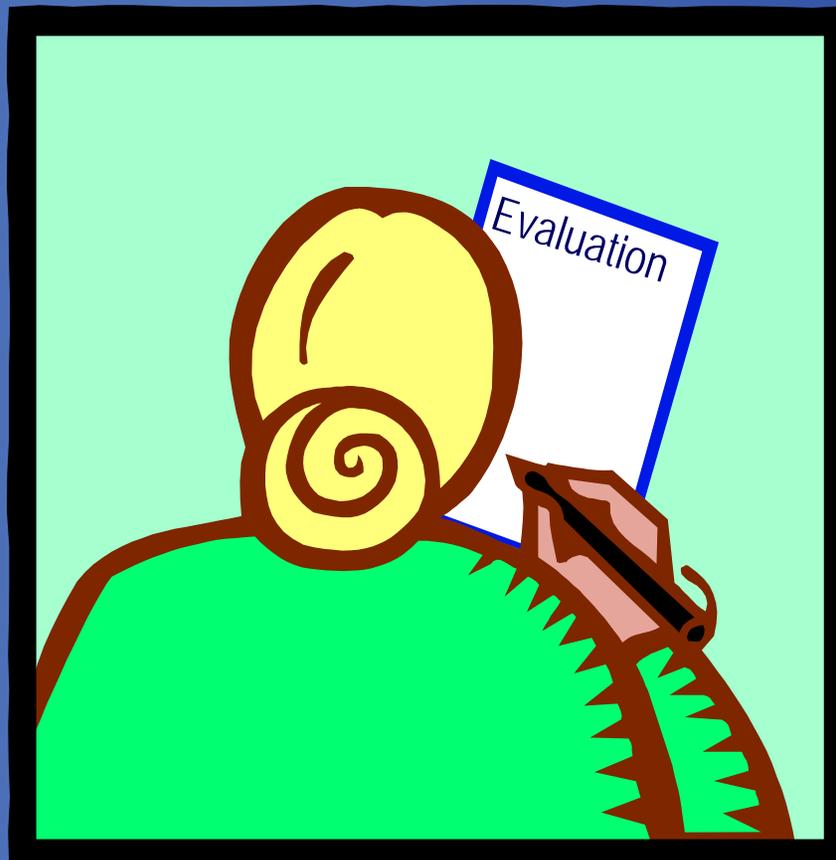
Must be
used for risk
adjustment



**HIPAA
Transaction**

Summary

- Identified data elements for risk adjustment.
- Identified three sources of risk adjustment data.
- Identified data collection formats available to MA organizations.
- Discussed considerations for methods of data collection.
- Discussed HIPAA transaction standards.



Please take a moment to complete the evaluation form for the Data Collection Module.

Thank You!

Data Submission

Presented by:
Aspen Systems Corporation

Purpose

- MA organizations are required to submit accurate diagnostic data when submitting risk adjustment data. This module describes the file layout for risk adjustment process submission.

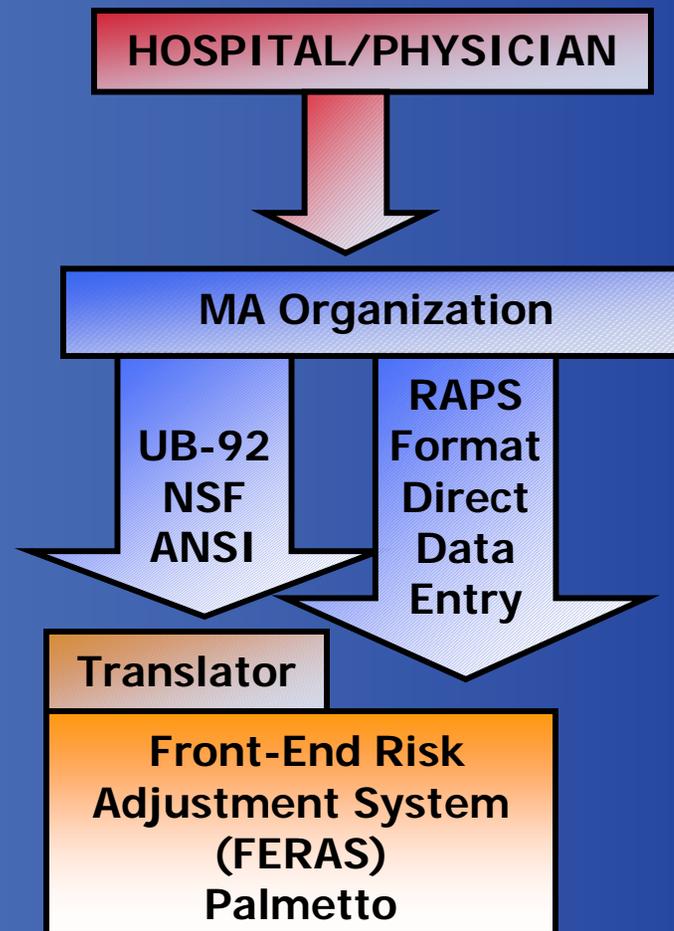
Objectives

- Understand the submission process requirements, connectivity options, and RAPS file layout.
- Identify the data elements required to submit risk adjustment data.
- Locate and describe the diagnosis clusters in the RAPS format.

Objectives (continued)

- Understand the DDE process.
- Describe the filtering process.
- Describe the diagnosis deletion process.

Risk Adjustment Process



Requirements for New Submitters

- Complete an Electronic Data Interchange (EDI) Agreement and submit to the CSSC.
- Complete contact information and sign.
- Select connectivity method.
- Make special arrangements for third party submitters.

Connectivity Options

| | |
|-------------------------------------|---|
| Connect:Direct | <ul style="list-style-type: none">• Mainframe-to-mainframe connection• Next day receipt of FERAS response |
| File Transfer Protocol (FTP) | <ul style="list-style-type: none">• Modem-to-modem connection• Requires password and phone line• Same day receipt of front-end response |
| Security Website | <ul style="list-style-type: none">• Extranet site hosted by Palmetto• Point and click features• Same day receipt of front-end response• Allows for Direct Data Entry via a secure website. |

Relevant Diagnosis

- Diagnosis is included in the CMS-HCC risk adjustment model.
- Diagnosis must be received from one of these of three provider types: hospital inpatient, hospital outpatient or physician.
- Diagnosis must be collected according to the risk adjustment data collection instructions.

Relevant diagnoses must be submitted for each beneficiary at least once during a reporting period.

Submission Formats

RAPS

NSF

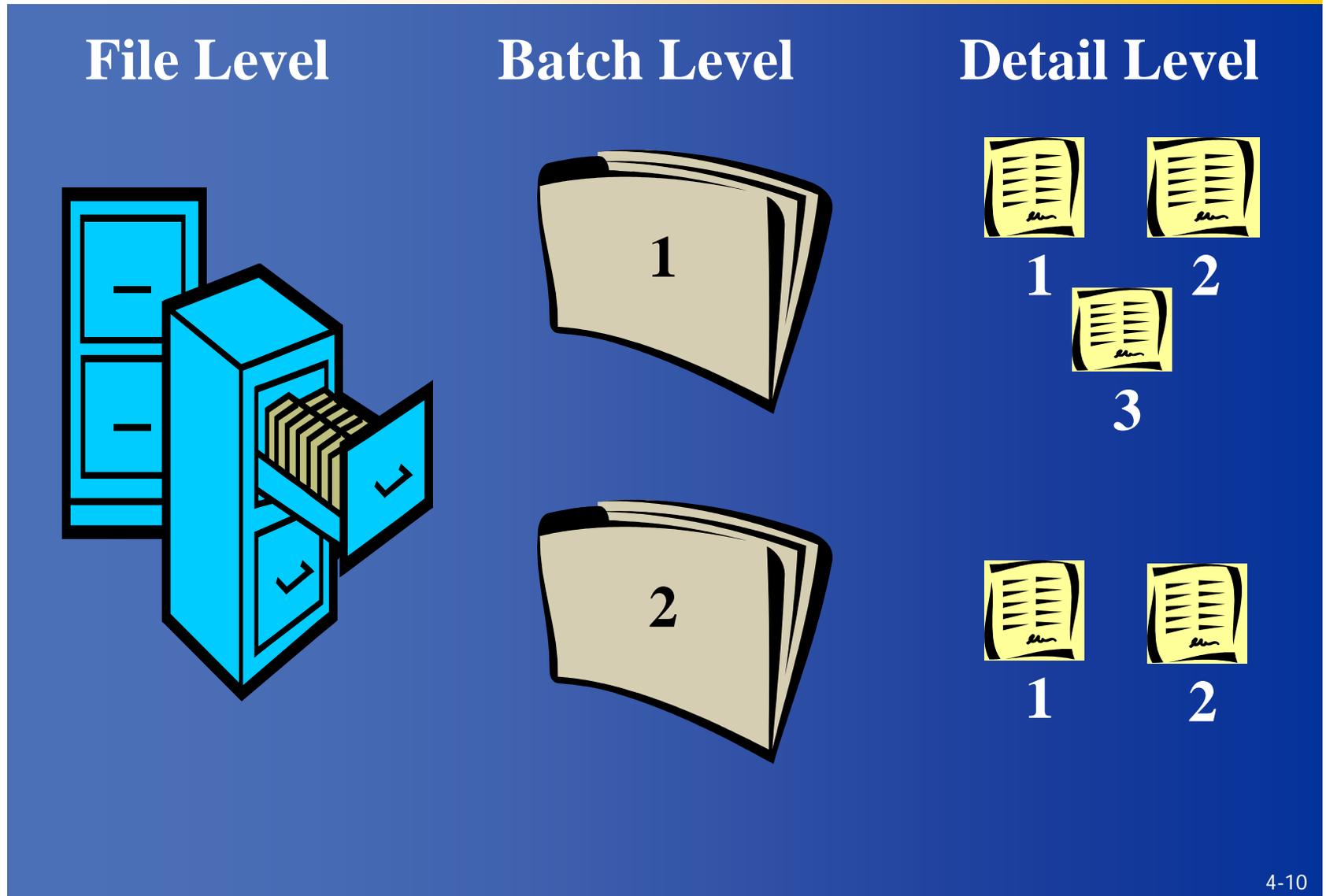


UB-92

ANSI

DDE

File Logic



Exercise



Fast Facts

- Same submitter may transmit for several MA organizations.
- More than one batch is allowed per H number.
- More than one detail record is allowed per HIC number.
- Provider numbers are not required.

Filtering Risk Adjustment Data

- MA organizations are required to filter risk adjustment data to ensure they submit data from only hospital inpatient, hospital outpatient, and physician provider types.

Filtering Risk Adjustment Data (continued)

- Filtering guidelines:
 - Hospital inpatient data require admission and discharge dates of service from appropriate facilities.
 - Physician data require face-to-face visits with a professional listed on the CMS specialty list.
 - Outpatient data require diagnoses from appropriate facilities and covered services contained on the CMS covered outpatient listings.

Modifying Data

- RAPS allows for modifying risk adjustment data previously submitted to CMS.
 - Adding data
 - Deleting data
 - Correcting data
- Incorrect clusters must be deleted from the system before correct cluster information can be added.

Deleting Diagnosis Clusters

- Each unique diagnosis cluster that RAPS accepts is stored separately.
- Only accepted diagnosis clusters may be deleted.
- Deletions may be submitted within a file, batch, or detail record containing previously submitted risk adjustment data.
- Erroneously submitted clusters must be deleted.

Reasons for Deleting Clusters

- Three reasons to delete a cluster:
 - Diagnosis cluster is submitted erroneously.
 - Incorrect HIC number used for submission of a beneficiary's diagnostic information.
 - Data fields in diagnosis cluster are incorrect.

Steps for Deleting Clusters

- Verify diagnosis cluster was accepted.
- Select method for deleting cluster.
 - RAPS format – submit correction using normal submission process with appropriate HIC number included.
 - DDE – submit correction via DDE screens to the front-end system.

Steps for Deleting Clusters (continued)

- Delete the incorrect cluster via RAPS format or DDE screens.
 - “D” is entered into the appropriate field to designate the cluster that needs to be deleted.
- If necessary, enter a cluster with the correct data.

Steps for Deleting Clusters (continued)

CCC

| | | |
|-----|----------------|----------|
| 9.0 | Provider Type | 20 |
| 9.1 | From Date | 20030715 |
| 9.2 | Through Date | 20030715 |
| 9.3 | Delete | D |
| 9.4 | Diagnosis Code | 038 |

| | | |
|------|----------------|----------|
| 10.0 | Provider Type | 20 |
| 10.1 | From Date | 20030615 |
| 10.2 | Through Date | 20030615 |
| 10.3 | Delete | |
| 10.4 | Diagnosis Code | 038 |

MA Organization Responsibilities for Deletions

- MA organizations must:
 - Delete a diagnosis cluster when any data in that cluster are in error.
 - When correcting data, submit a corrected cluster to replace the deleted cluster.
 - Corrections and deletions may be submitted on the same record or in the same file.

MA organizations should not delete a diagnosis code or record repeatedly on the same day and in the same record. Duplicate deletes in the same record on the same day cause system problems.

NSF Submissions

- All NSF submissions will be translated to Provider Type 20 in RT CCC 9.0.
- RT CCC 2 will be processed by Palmetto in the order in which the detail records appear in the batch.
- NSF Record Identifiers AA0 1.0, BA0 1.0, CCC 1.0, YA0 1.0, and ZA0 1.0 must be populated.

UB-92 Submissions

- RT CCC 2 will be processed by Palmetto in the order in which the detail records appear in the batch.
- UB-92 Record Identifiers must be populated.
 - RT 01 1.0
 - RT 10 1.0
 - RT 20 1.0
 - RT 95 1.0
 - RT 99 1.0

Direct Data Entry

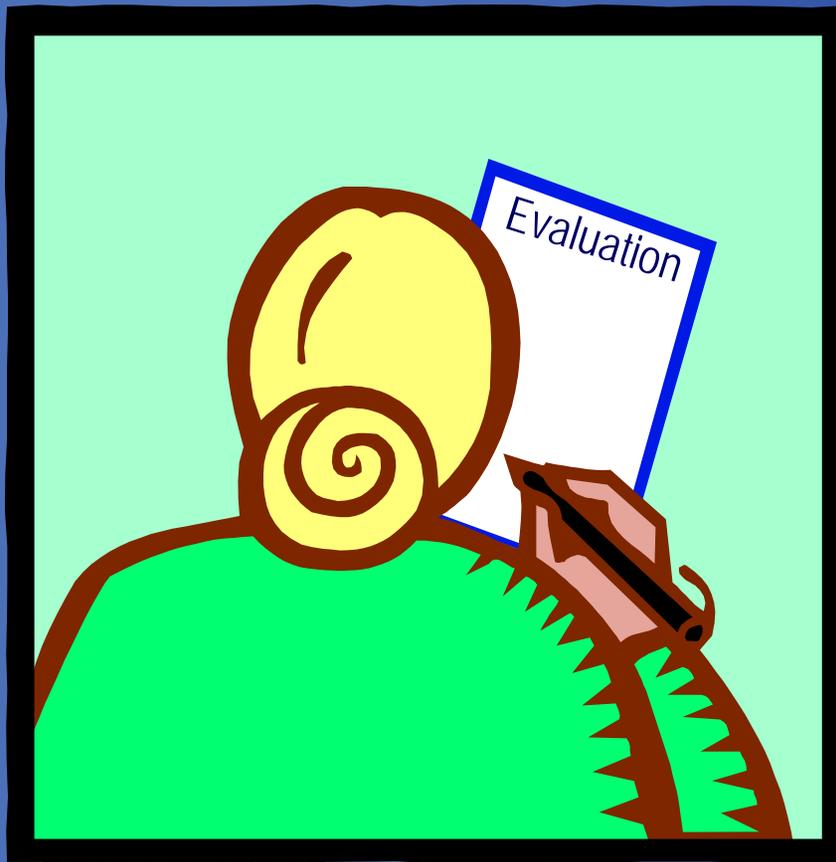
- DDE entries allow for deletion of records for corrections even if another submission format was used.
- DDE screens automatically prevent the placement of incorrect data characters (e.g., alpha characters in the “From Date” or “Through Date” fields).
- DDE submissions are reported in the Front-End Response Report found in the electronic mailbox.

Summary

- Described the submission process requirements, connectivity options, and RAPS file layout.
- Identified the data elements required to submit risk adjustment data.
- Located and described the diagnosis clusters in the RAPS format.

Summary (continued)

- Provided an overview of the DDE process.
- Described the filtering process.
- Described the diagnosis deletion process.



Please take a moment to complete the evaluation form for the Data Submission module.

Thank You!



Edits

Presented by:
Aspen Systems Corporation

Purpose

- To provide participants with an understanding of risk adjustment system edits.
- To describe the common edits and assist MA organizations with the required steps to prevent errors in the future.

Objectives

- Understand the FERAS and RAPS data integrity logic and error codes.
- Describe how the Medicare Beneficiary Database (MBD) supports the editing process.
- Describe the FERAS and RAPS editing processes.
- Recognize common FERAS and RAPS errors and determine action required to avoid or correct them.

Data Flow

FERAS → format checks
→ integrity checks
→ validity checks
...on A, B, Y, Z, and first
and last CCC records

**Errors,
file
rejected**

resolve

file accepted

RAPS → format edits
→ integrity edits
→ validity edits
...on all CCC records

**Errors,
file
rejected**

resolve

FERAS Checks

*Format
Checks*

*Integrity
Checks*

*Validity
Checks*

*Format,
Integrity,
&
Validity
Checks*

Checks on file and batch levels

Checks on
first & last
CCC records

Example 1

Scenario: The MA organization submitted a file and entered "AA1" in record type AAA, field 1.

Result: FERAS will reject the entire file with error message 100. The field must always be populated with "AAA".

FERAS Edits Logic

| Series | Explanation |
|-----------|--|
| 100 | File level errors on the AAA or ZZZ records. |
| 200 | Batch level errors on the BBB or YYY records. |
| 300 & 400 | Check performed on first and last CCC records. |

The entire file will be returned to the submitter.

Error Code Ranges

| | | | | |
|-----|---|-----------------|---|-----|
| 100 | [| 101-12 <u>5</u> | → | AAA |
| | | 151-17 <u>5</u> | → | ZZZ |
| 200 | [| 201-22 <u>5</u> | → | BBB |
| | | 251-27 <u>5</u> | → | YYY |

Example 2

Scenario: The MA organization submitted a file with a 2.0 in the Diagnosis Filler field on the first CCC record.

Results: FERAS will reject the complete file due to data being placed in the Filler field of the diagnosis cluster. FERAS will identify this error since it occurred in the first CCC record.

RAPS Edits

FERAS

- format checks
 - integrity checks
 - validity checks
- ...on A, B, Y, Z, and first and last CCC records

**Errors,
file
rejected**

resolve

file accepted

RAPS

- format edits
 - integrity edits
 - validity edits
- ...on all CCC records

**Errors,
file
rejected**

resolve

RAPS Editing Rules



Stage 1 - Field Validity and Integrity edits

Stage 2 - Field-to-Field edits

Stage 3 - Medicare Beneficiary Database edits

Stage 4 - Diagnosis Code edits

RAPS Editing Rules



Stage 1 - Field Validity and Integrity edits

Stage 2 - Field-to-Field edits

Stage 3 - Medicare Beneficiary Database edits

Stage 4 - Diagnosis Code edits

RAPS Editing Rules



Stage 1 - Field Validity and Integrity edits

Stage 2 - Field-to-Field edits

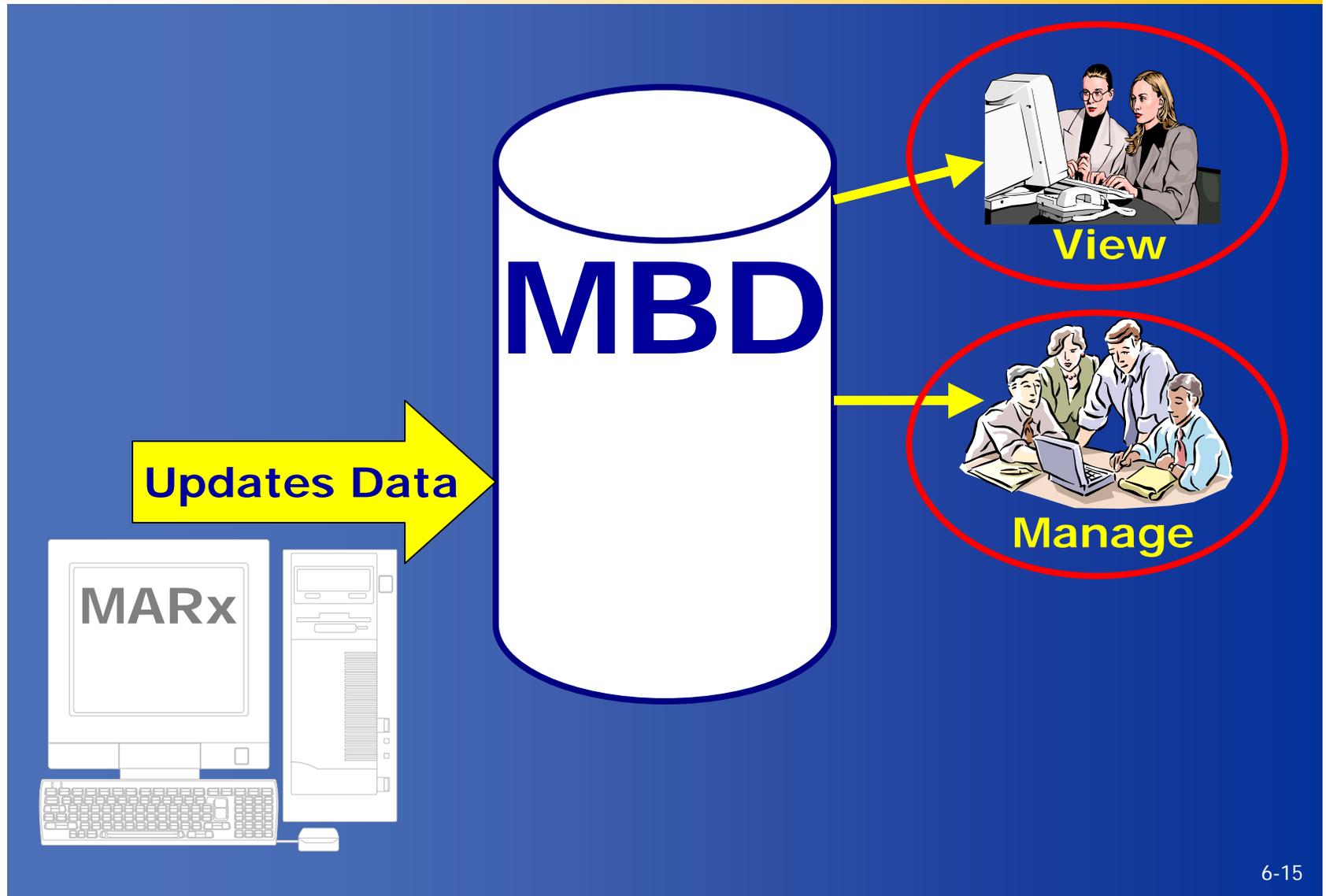
Stage 3 - Medicare Beneficiary Database edits

Stage 4 - Diagnosis Code edits

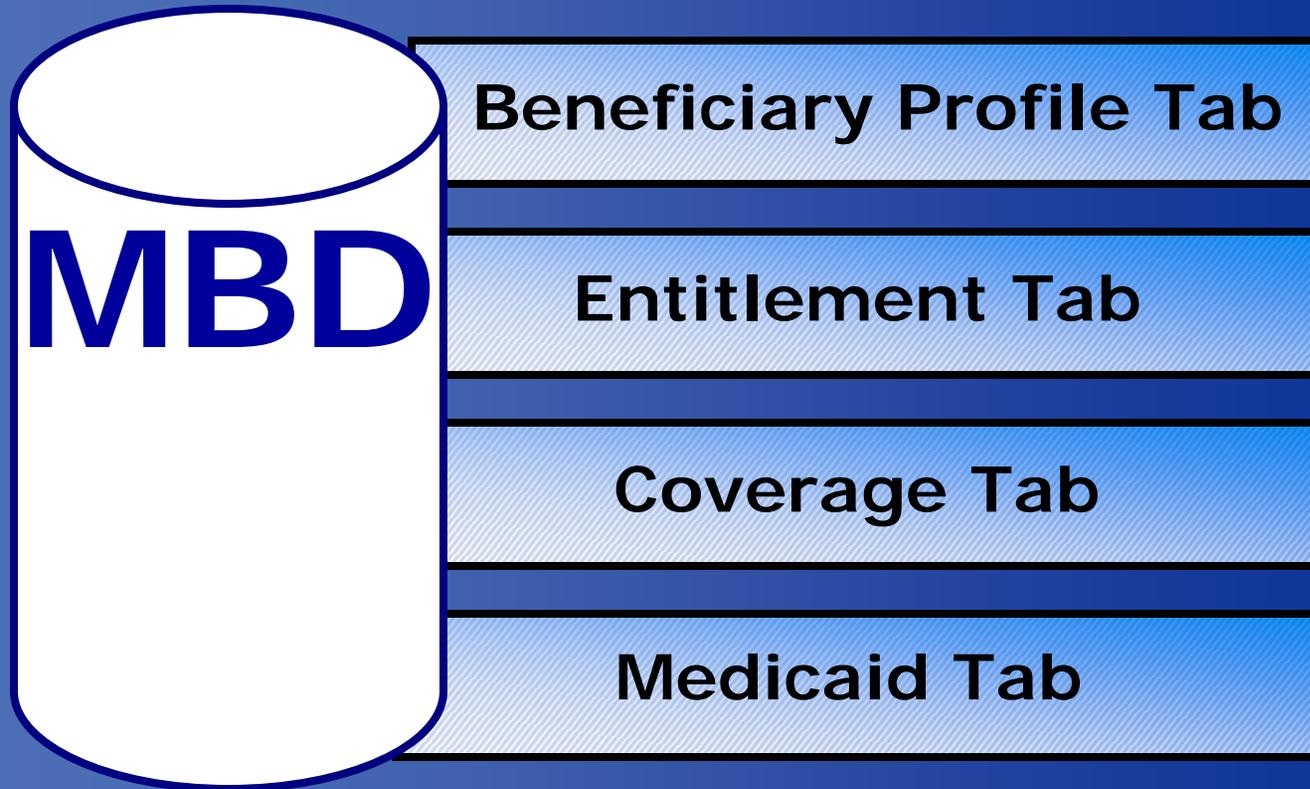
Medicare Beneficiary Database



Medicare Beneficiary Database (continued)



Data Stored in MBD



RAPS Editing Rules



Stage 1 - Field Validity and Integrity edits

Stage 2 - Field-to-Field edits

Stage 3 - Medicare Beneficiary Database edits

Stage 4 - Diagnosis Code edits

RAPS Error Codes

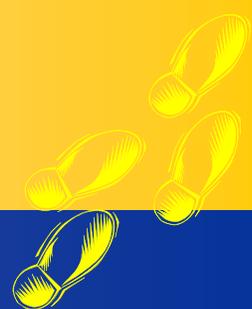
| | Series | Explanation of error and consequences |
|---------|---------|--|
| Record | 300-349 | Record-level error - The record was bypassed and all editing was discontinued. No diagnosis clusters from this record were stored. |
| | 350-399 | Record-level error - All possible edits were performed, but no diagnosis clusters from this record were stored. |
| Cluster | 400-489 | Diagnosis cluster error - All possible diagnosis edits were performed, but the diagnosis cluster is not stored. |
| | 490-499 | Diagnosis delete error - Diagnosis was not deleted. |
| | 500-599 | Informational message, all edits were performed, diagnosis cluster was stored unless some other error is noted. |

Example 3

Scenario: The Low Rest Insurance Company submitted a risk adjustment transaction for Susan Doe, who was admitted into the hospital. The principal diagnosis submitted was 601.0 for acute prostatitis.

Results: Error code 453 would occur. The system checked that the diagnosis field was complete. Next, the system verified that the HIC number was entered. RAPS then verified that the HIC number was in the MBD and the beneficiary was eligible. The diagnosis was determined to be a valid diagnosis. However, the diagnosis was not valid for the sex. This diagnosis cluster was rejected and not stored in RAS.

Resolution Steps



1. Determine the error level of the code to identify the nature of the problem.
2. Look up the error code and read the associated message.
3. Based on the error message, determine the next step.
4. Take steps to resolve the error.

Example 4

Scenario: John Smart at BaseCare Health Plan deleted a diagnosis cluster. Later the same day, he mistakenly added the same cluster using DDE. Realizing his mistake, John immediately attempted to delete this cluster using DDE.

Results: Error code 492 occurs. The diagnosis cluster was not deleted. A diagnosis cluster with the same attributes was already deleted from the RAPS database on this date.

Example 5

Scenario: Horizon Valley Health Plan submitted eight diagnosis clusters. However, the fifth diagnosis cluster was a blank cluster.

Results: Error code 455 occurs. All of the diagnosis clusters following the incomplete cluster received the error code 455. All possible diagnosis edits were performed, but the diagnosis clusters were not stored.

Exercise

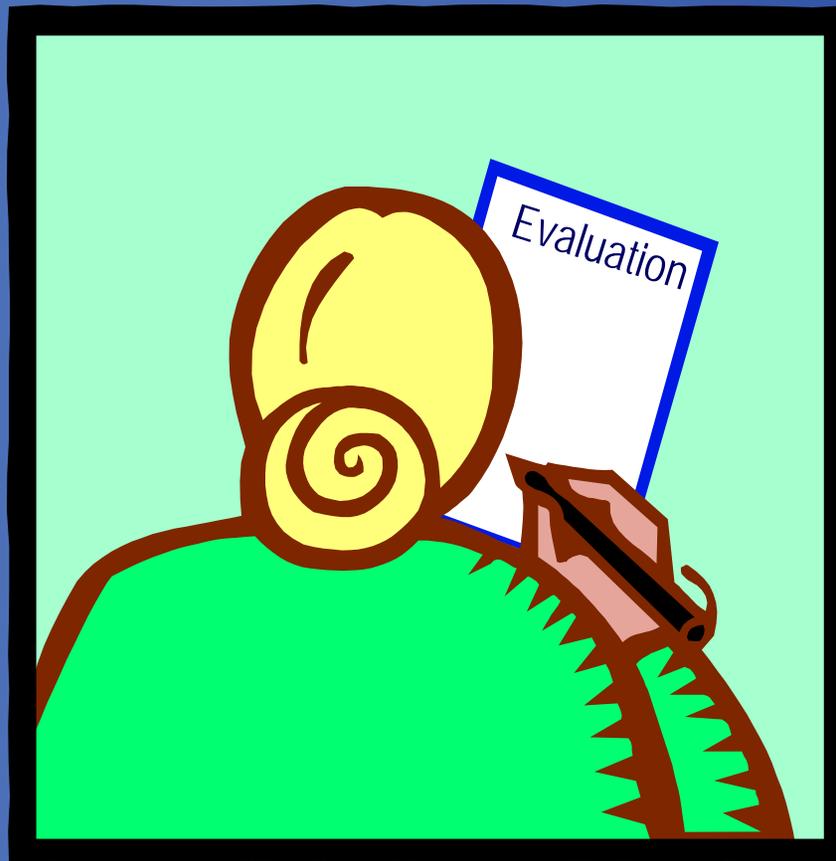


Common Errors

| | |
|-------------------|--|
| 113 | Duplicate File Name |
| 491 | Delete Error, Diagnosis Cluster Previously Deleted |
| 492 | Diagnosis Cluster Not Successfully Deleted |
| 408 409 410 | Service Date Not Within MA Enrollment Not Enrolled in Plan |

Summary

- Explained the FERAS and RAPS data integrity logic and error codes.
- Described how the Medicare Beneficiary Database supports the editing process.
- Described the FERAS and RAPS editing processes.
- Discussed common FERAS and RAPS errors and determined action required to avoid or correct them.



Please take a moment to complete the evaluation form for the Edits Module.

Thank You!



Reports

Presented by:
Aspen Systems Corporation



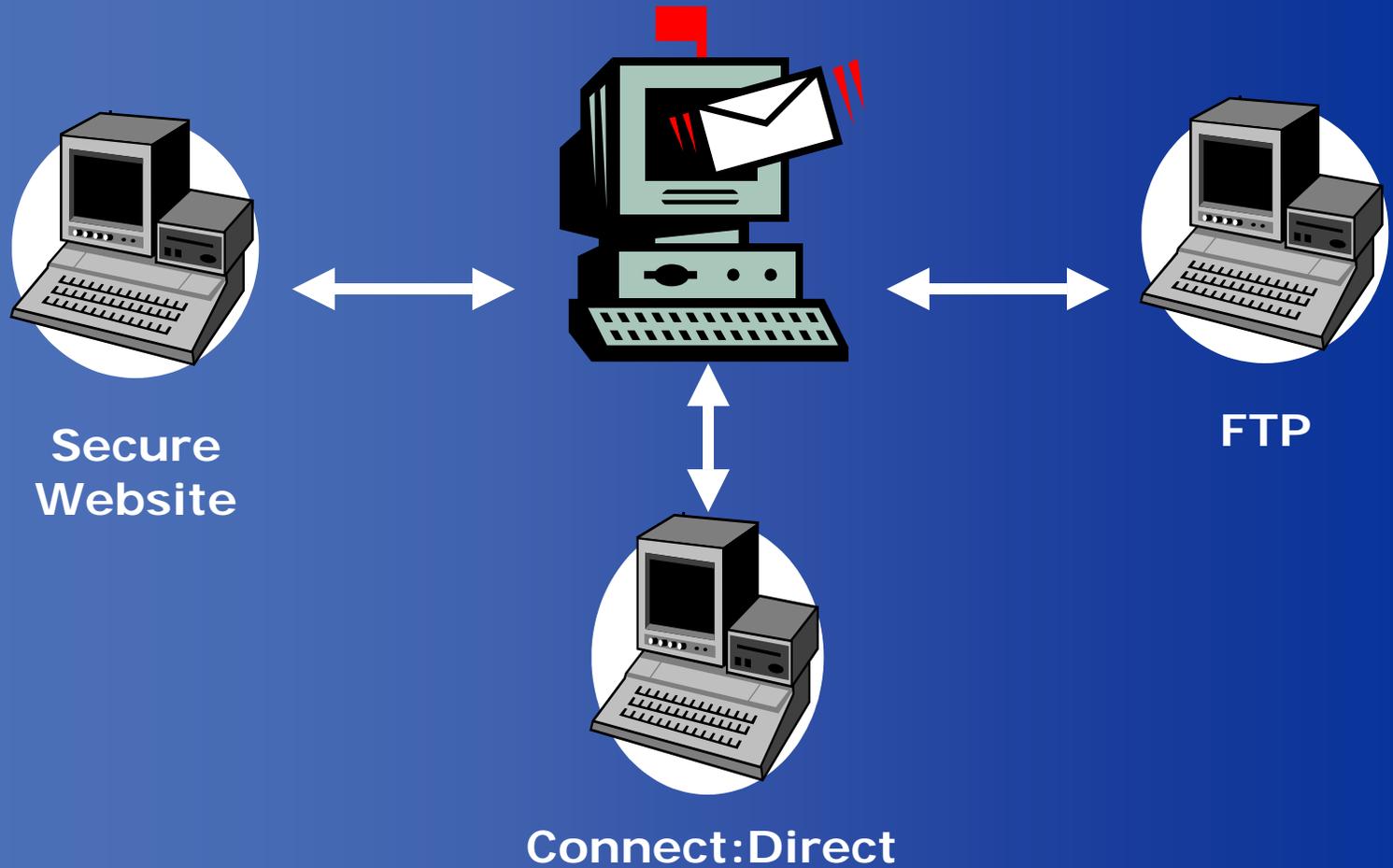
Purpose

- To provide insight on the use of the RAPS reports in managing data collection, data submission, and error resolution.

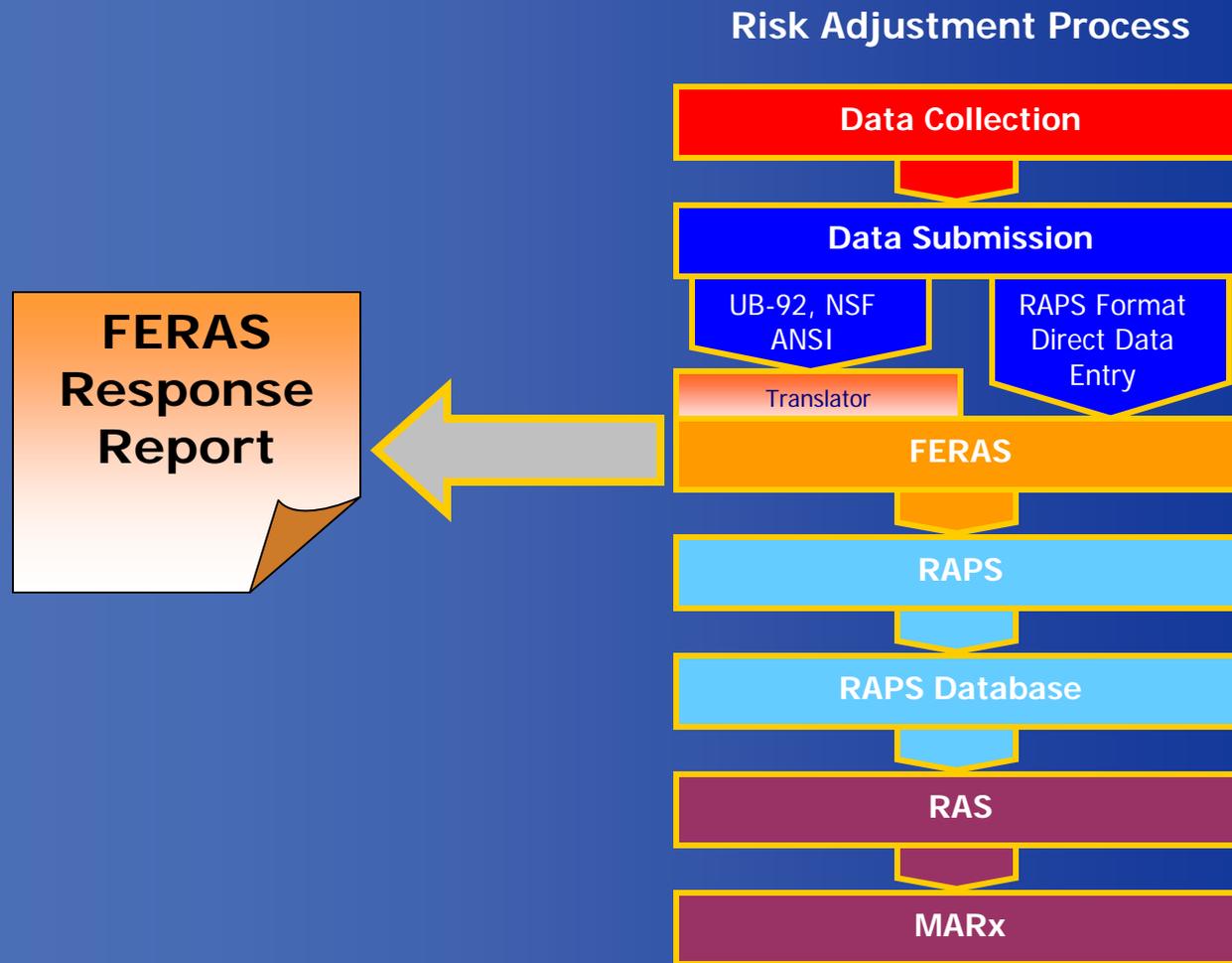
Objectives

- Identify the purpose of each risk adjustment report.
- Determine the best uses of the reports to monitor data collection and submission processes, and to resolve errors.
- Accurately read the risk adjustment reports and identify and submit corrections.
- Understand the relationship between values in the RAPS Transaction Summary and the management reports.

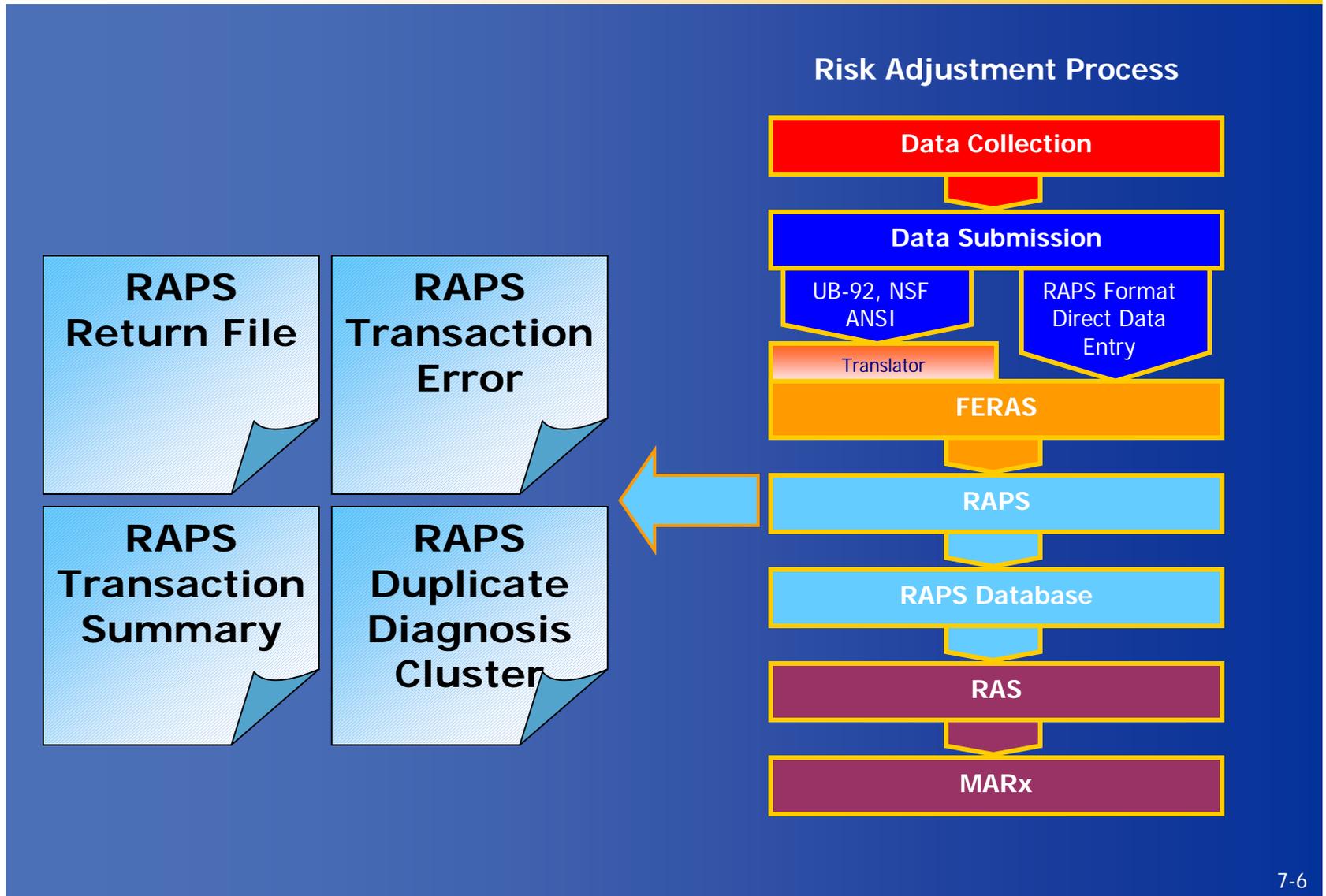
Accessing Reports



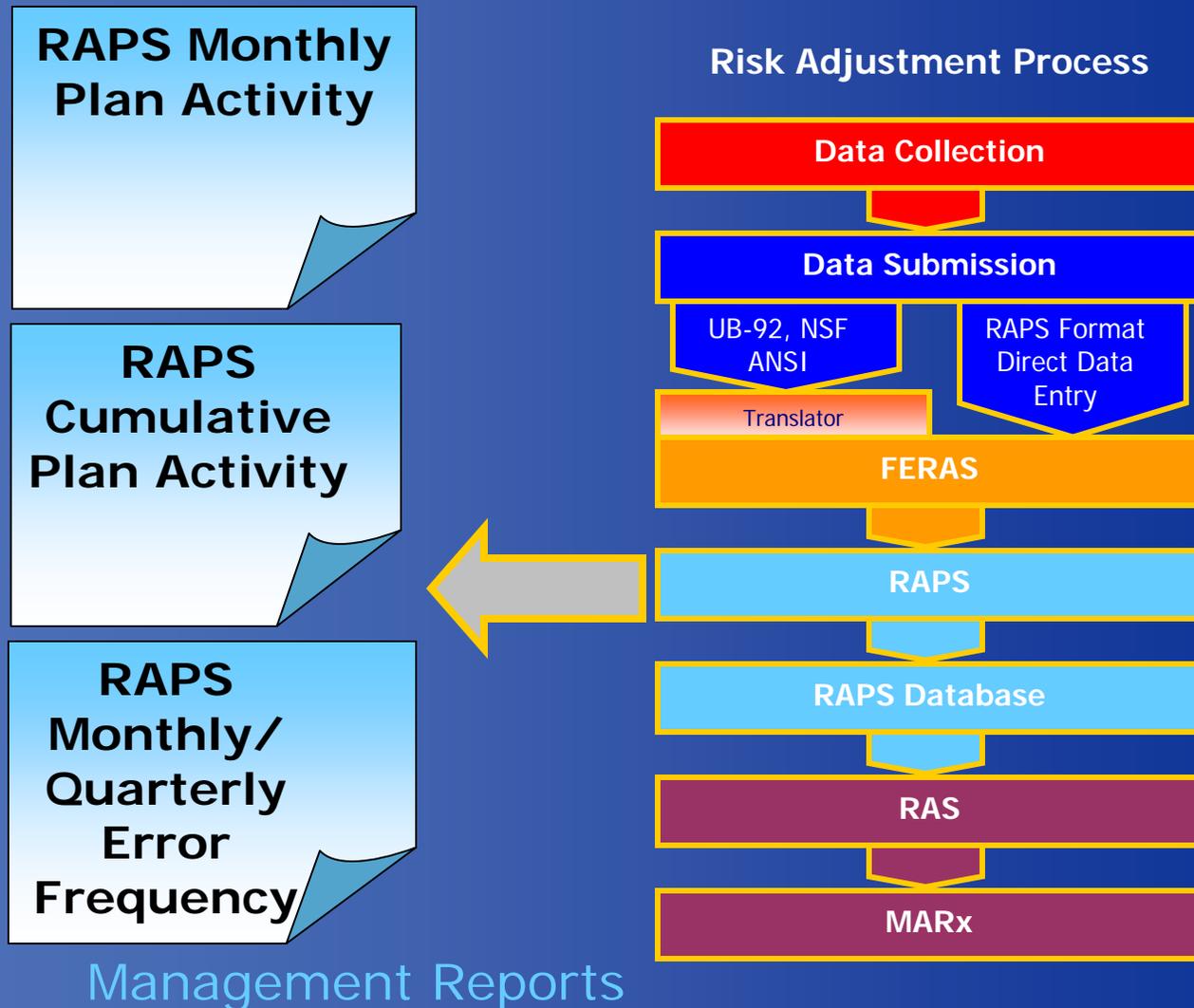
Reports Overview



Reports Overview (continued)



Reports Overview (continued)





FERAS Response Report

- Indicates that the file has been accepted or rejected by the front-end system.
- Identifies reasons for rejection.
- Available in report layout only.
- Received:
 - The same business day, generally within 15 minutes (FTP and Secure website users).
 - The next business day (Connect:Direct users).

FERAS Response Report Example

The MA organization submitted a file containing a file ID that was used within the last twelve months. The second batch did not include a plan number. The first detail record was missing a HIC number, and the fourth YYY batch trailer plan number did not match the plan number in the BBB batch header.



RAPS Return File

- Contains all submitted transactions.
- Error codes appear in the file.
- Flat file format may be downloaded to an Access or Excel database.
- Returned the next business day after submission.

RAPS Return File (continued)

- Communicates information in fields:
 - 3 → Sequence Number error code
 - 6 → HIC Number error code
 - 8 → Date of Birth error code
 - 9.6 → Diagnosis Cluster Error 1
 - 9.7 → Diagnosis Cluster Error 2
 - 19 → Corrected HIC Number

RAPS Return File Example

The MA organization submitted a file and included the beneficiary's DOB. RAPS determined a discrepancy between DOB submitted on the file and what is stored in MBD. The submitter received a RAPS Return File.

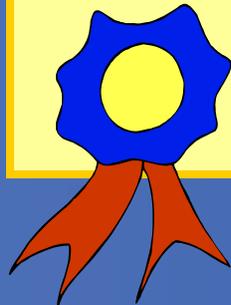


Uses for RAPS Return File Format

Identify steps in the process where there may be data processing issues.

Help physicians & providers submit clean data in a timely manner.

Confirm that the right data and the right amount of data is being submitted.



Improve the quality and quantity of data submissions!



RAPS Transaction Error Report

- Displays detail-level (CCC) record errors that occurred in RAPS.
- Available in report layout only.
- Received the next business day after submission.

RAPS Editing Rules



Stage 1 - Field Validity and Integrity edits

Stage 2 - Field-to-Field edits

Stage 3 - Medicare Beneficiary Database edits

Stage 4 - Diagnosis Code edits

Exercise





RAPS Transaction Summary Report

- Identifies the number of clusters received for each provider type.
- Summarizes the disposition of all diagnosis clusters.
- Accompanies the RAPS Transaction Error Report.
- Available in report layout only.
- Received the next business day after submission.



Relationship Between Values in RAPS Transaction Summary Report

$$\begin{aligned} & \text{Total Rejected} \\ & + \text{Total Accepted} \\ & + \text{Total Deletes Accepted} \\ & + \underline{\text{Total Deletes Rejected}} \\ & = \text{Total Submitted} \end{aligned}$$

$$\text{Total Stored} \leq \text{Total Accepted}$$

$$\text{Total Model Diagnoses Stored} \leq \text{Total Stored}$$



RAPS Duplicate Diagnosis Cluster Report

- Lists diagnosis clusters with 502-error information message.
- Reflects clusters previously submitted and stored in the RAPS database with same:
 - HIC number
 - Provider type
 - From and through dates
 - Diagnosis
- Received the next business day after submission.

Analysis of Management Reports

RAPS MONTHLY PLAN ACTIVITY REPORT



**Read the
management reports
left to right and then
top to bottom.**



RAPS Monthly Plan Activity Report

- Provides a summary of the status of submissions for a 1-month period.
- Arrayed by provider type and month based on through date of service.
- Reported by submitter ID and H number.
- Allows tracking on a month-by-month basis of all diagnosis clusters submitted.
- Available for download the second business day of the month.



RAPS Cumulative Plan Activity Report

- Provides a cumulative summary of the status of submissions.
- Report format similar to Monthly Plan Activity Report.
- Service year "9999" indicates data have been rejected (not stored).
- Available for download the second business day of the month.



RAPS Error Frequency Reports

- Received monthly and quarterly.
 - Monthly summary
 - Three-month summary
- Summary of errors received in test and production.
- Displays frequencies for all errors received by provider type.
- Report layout.
- Available for download the second business day of the month/quarter.



Correcting Rejected Data

- When submitting corrected data, rejected clusters are reflected in
 - Cumulative totals for month.
 - Total rejections.
- When cluster is counted as stored,
 - It remains part of the stored count on Cumulative Plan Activity Report, even if it is deleted.
- Deleted clusters are included in total stored and total deleted.

Management Reports Summary

- Identify internal processes affecting data collection and submission.
- Identify external issues affecting data collection.

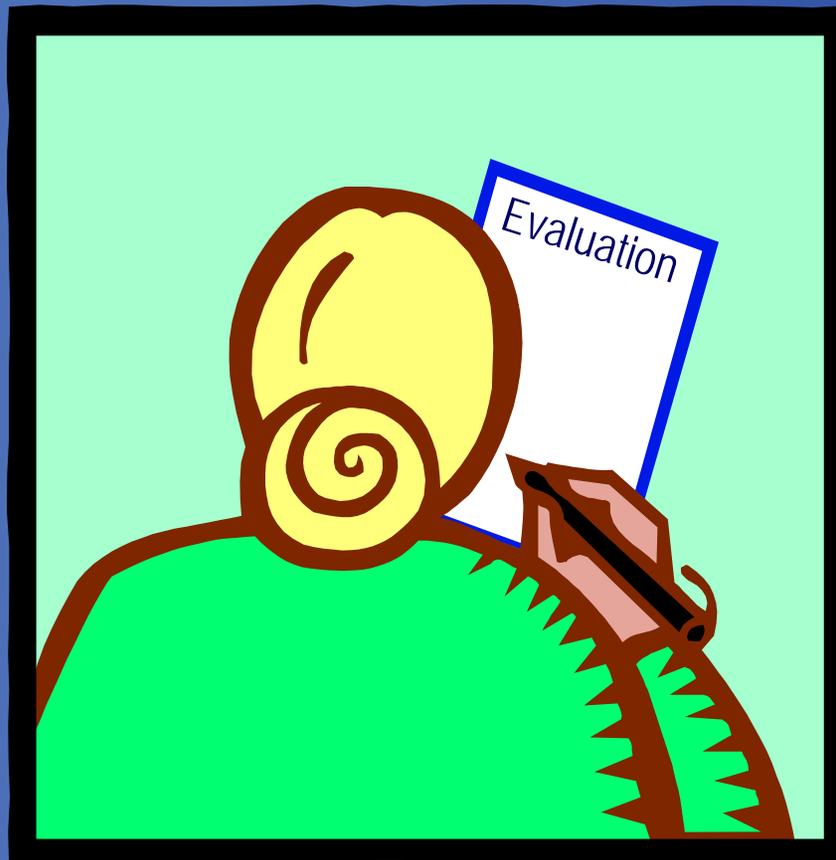


Naming Conventions

| REPORT NAME | MAILBOX IDENTIFICATION |
|---|--------------------------------|
| FERAS Response Report | RSP#####.RSP.FERAS_RESP |
| RAPS Return File | RPT#####.RPT.RAPS_RETURN_FLAT |
| RAPS Transaction Error Report | RPT#####.RPT.RAPS_ERROR_RPT |
| RAPS Transaction Summary Report | RPT#####.RPT.RAPS_SUMMARY |
| RAPS Duplicate Diagnosis Cluster Report | RPT#####.RPT.RAPS_DUPDX_RPT |
| RAPS Monthly Plan Activity Report | RPT#####.RPT.RPAS_MONTHLY |
| RAPS Cumulative Plan Activity Report | RPT#####.RPT.RAPS_CUMULATIVE |
| RAPS Monthly Error Frequency Report | RPT#####.RPT.RAPS_ERRFREQ_MNTH |
| RAPS Quarterly Error Frequency Report | RPT#####.RPT.RAPS_ERRFREQ_QTR |

Summary

- Identified the purpose of each risk adjustment report.
- Determined the best uses of the reports to monitor data collection and submission processes, and to resolve errors.
- Accurately read the risk adjustment reports to identify and submit corrections.
- Reviewed the relationship between values in RAPS Transaction Summary and management reports.



Please take a moment to complete the evaluation form for the Reports Module.

Thank You!



Risk Adjustment Data Validation

Presented by:
Centers for Medicare & Medicaid Services



Purpose

- To provide participants with an understanding of the risk adjustment data validation process to ensure risk adjusted payment integrity and accuracy.

Objectives

- Identify purpose and goals of risk adjustment data validation.
- Identify and describe stages of risk adjustment data validation.
- Learn about the components of a medical record request.
- Describe requirements for acceptable medical record documentation.

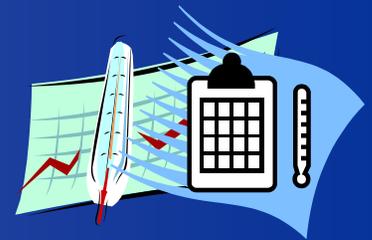


Objectives (continued)

- Identify risk adjustment discrepancies.
- Describe payment adjustments and appeals.
- Provide recommendations and lessons learned.

What is Risk Adjustment Data Validation?

- Process of verifying that medical record documentation supports diagnosis codes submitted for payment.
- **Purpose:** *To ensure risk adjusted payment integrity and accuracy.*





Data Validation Goals

- Identify:
 - Confirmed risk adjustment discrepancies.
 - Plans in need of technical assistance to improve risk adjustment data quality.
- Measure:
 - Accuracy of risk adjustment data.
 - Impact of discrepancies on payment.
- Improve:
 - Quality of risk adjustment data.
 - The CMS-Hierarchical Condition Category (HCC) model.

Risk Adjustment Data Validation Background

CY2000 – CY2003

- Based on Principle Inpatient Diagnostic Cost Group (PIP-DCG) model.
- Reviewed only hospital inpatient medical records for exact RAPS dates of service.

CY2004 and beyond

- Based on CMS-HCC model.
- Review hospital inpatient, hospital outpatient, and physician medical records.
- More flexible approach for selecting medical records.



CMS-HCC Data Validation Guiding Principle

The medical record documentation must show that the HCC diagnosis was assigned within the correct data collection period from an appropriate provider type and is coded according to the *ICD-9-CM Guidelines for Coding and Reporting*.



Risk Adjustment Data Validation Process

- STAGE 1 Plan Selection
- STAGE 2 Medical Record Request Process
- STAGE 3 Medical Record Review
- STAGE 4 Plan-Level Findings
- STAGE 5 Payment Adjustment
- STAGE 6 Appeals
- STAGE 7 Correct Payment

Two types of samples

- Random sample is used to derive:
 - National net payment error estimates; and
 - National data discrepancy rates
- Targeted sample may include plans with:
 - Potentially problematic risk adjustment data; and/or
 - Problematic past data validation findings

Every MA organization has equal opportunity of being selected.



Medical Record Request Process

STAGE 2

Three segments:

- Request
- Submission (Plan Response)
- Receipt



Medical Record Request Process

(continued)

STAGE 2

Request

CMS & Initial Validation Contractor (IVC)

- Plans receive:
 - Initial contact letter
 - Beneficiary list with diagnosis clusters and HCCs to be validated
 - Comprehensive instructions
 - Coversheets for each unique beneficiary HCC being validated

Submission (Plan Response)

- Plan must:
 - Select “one best medical record”
 - Complete medical record coversheet for each beneficiary HCC
 - Identify date(s) of service and diagnosis code
 - Attach coversheet to relevant clinical documentation and submit by the deadline

Multiple HCCs may be supported by one medical record; thus attach all coversheets to the appropriate related record.

Medical Record Request Process

(continued)

8 → **STAGE 2**

Submission (Plan Response)

- Medical Record Coversheet Contains
 - All RAPS diagnosis clusters for an HCC
 - ICD-9-CM code and service date(s) identified from RAPS
 - Option for the plan to submit an “in lieu of” medical record and fill in
 - date of service not submitted to RAPS; and
 - acceptable provider type

Date of service must be within the data collection period.



Medical Record Request Process

(continued)

STAGE 2

Receipt (CMS Contractor)

- Receives and logs medical records and coversheets.
- Conducts administrative and clinical checks.

Medical Record Documentation

Good Documentation = Accurate Payment

Conduct Visit



Assign Diagnosis Code



ICD-9 Code

Document Visit



Submit and
Obtain Risk
Adjusted
Payment



Medical Record Documentation (continued)

All documentation submitted for medical record review must be:

Concise

Reason for the face-to-face visit

Consistent

Services rendered

Complete

Conclusions, diagnoses, and follow-up

Legible

Assignment of ICD-9-CM codes based on clear clinical documentation

Authenticated

By the provider (legible name and credentials)

Dated

Date of service noted

Medical Record Documentation (continued)

Medical record documentation is required to record pertinent facts, findings, and observations about an individual's health history, including past and present illnesses, examinations, tests, treatments, and outcomes.

Source: 1997 Documentation Guidelines for Evaluation and Management Services



Medical Record Documentation (continued)

Guidelines for Acceptable Documentation

- Coder able to determine that a patient evaluation was performed by physician.
- ICD-9-CM code assigned in accordance with *ICD-9-CM Guidelines for Clinical Documentation*.
 - *Inpatient*
 - *Outpatient*
- Physician signature and date of service present.



Medical Record Documentation (continued)

Hospital Outpatient and Physician Documentation

Problem Lists

- No universal definition.
- Must be more than a list of conditions.
- Must be comprehensive and show evaluation and treatment for the visit.
- Must be signed and dated by physician or acceptable physician extender.



Medical Record Documentation (continued)

Hospital Outpatient and Physician Documentation

Diagnostic Radiology

- Indicates impression only or unconfirmed diagnosis.
- The referral diagnosis is not a confirmed diagnosis, thus HCC cannot be confirmed.
- Referring physician/PCP usually reviews and documents condition.

(Diagnostic radiology will not be accepted beginning with CY2006)



Medical Record Documentation (continued)

Acceptable Physician Signatures

| | |
|--|--|
| Hand-written signatures or initials, including credentials | <ul style="list-style-type: none">• Mary C. Smith, MD; or MCS, MD |
| Signature stamp | <ul style="list-style-type: none">• Must comply with state regulations for signature stamp authorization |
| Typed signature | <ul style="list-style-type: none">• Requires authentication by the responsible provider |
| Electronic signature | <ul style="list-style-type: none">• Requires authentication by the responsible provider (e.g., "Approved by," "Signed by," "Electronically signed by")• Must be password protected and used exclusively by the individual physician |

Medical Record Documentation (continued)

Unacceptable

The medical record is invalid and will not be reviewed if:

1. There is dated medical record documentation (e.g., handwritten or transcribed consultation report, discharge summary)...

and

2. There is no physician signature on the record...



Medical Record Documentation (continued)

Several sources of medical records and types of documentation are **not acceptable** for risk adjustment data validation.

1. Diagnoses
2. Sources
3. Types



Medical Record Documentation (continued)

Unacceptable Documentation

1. Diagnoses – medical record documentation that reflects diagnoses that are:
 - Probable
 - Suspected
 - Questionable
 - Rule out
 - Working



Medical Record Documentation (continued)

Unacceptable Documentation

2. Sources

- Skilled nursing facility (SNF)
- Freestanding ambulatory surgical center (ASC)
- Alternative data sources (e.g., pharmacy)
- Inappropriate physician extenders (e.g., nutritionist)
- Durable medical equipment (DME)



Medical Record Documentation (continued)

Unacceptable Documentation

3. Types

- Superbill
- Physician-signed attestation
- List of patient conditions
- Un-interpreted diagnostic report
- Documentation for dates of service outside the data collection period



Medical Record Review

8 → **STAGE 3**

- Certified coders abstract diagnosis codes and validate date(s) of service.
- Risk adjustment discrepancies identified when RAPS HCC differs from HCC assigned after validation.

The second independent validation contractor (SVC) confirms all risk adjustment discrepancies.



Medical Record Review

(continued)

STAGE 3

Risk Adjustment Discrepancies Occur With:

- Invalid Medical Records
 - Unacceptable provider type or source.
 - Date of service outside of data collection period.
 - Missing provider signature.
- Missing Medical Records
 - Cannot assign ICD-9-CM code due to insufficient or incomplete documentation.
 - No medical record was submitted to support the HCC.
- Coding Discrepancies that change HCC assignment
 - ICD-9-CM code assigned after validation changes an original beneficiary HCC.

Risk adjustment discrepancies effect the beneficiary risk score.

Medical Record Review (continued)

STAGE 3

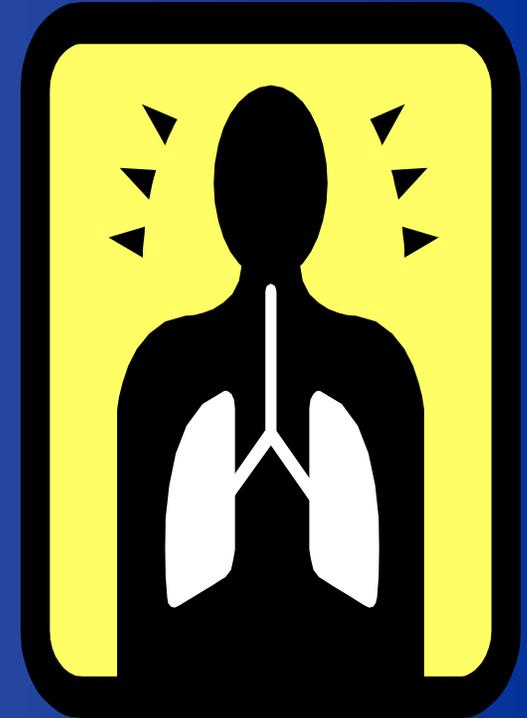
Risk Adjustment Discrepancy

Reported Diagnostic Data:

*482.4 Staphylococcal Pneumonia
(HCC111, .693)*

Data Validation Findings:

*482.3 Streptococcal Pneumonia
(HCC112, .202)*





Data Validation Findings

STAGE 4

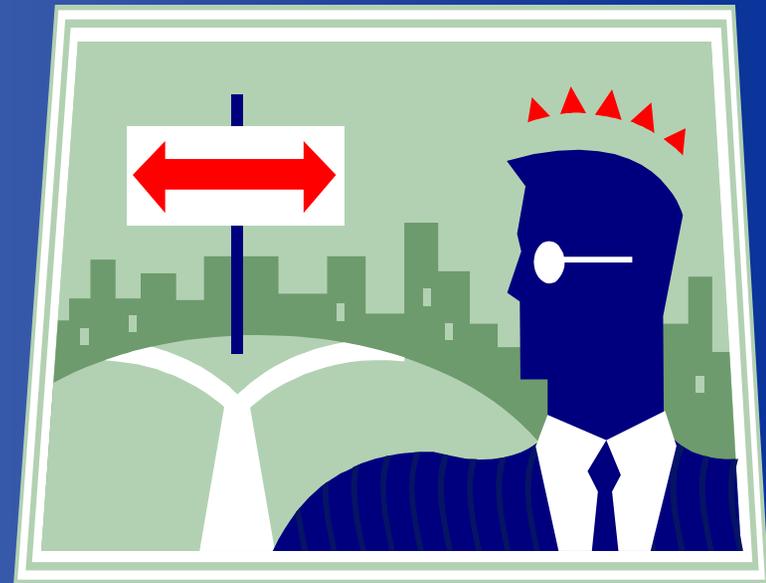
- MA organization-specific findings shared with data validation participants.
 - May include response rate, risk adjustment discrepancy rate, and all beneficiaries with an HCC discrepancy.
- Summary findings shared with the MA industry.



Payment Adjustments

STAGE 5

Payment adjustment decisions are made by the CBC Director





Payment Adjustments

(continued)

8 → **STAGE 5**

- Corrects payments based on confirmed validation discrepancies.
- Generally made at the beneficiary level.
- Serve as the basis for appeals.



Appeals

STAGE 6

Purpose: To provide MA organizations an opportunity to dispute a payment adjustment .

- Implemented by the SVC.
- Consistent with Medicare fee-for-service procedures.
- MA organizations given 60 days to file a written appeal after an adjustment appears on the MMR.



Correct Payment



- Risk adjusted payments are corrected based on the appeals decision.
- Appeals decisions either uphold or reverse payment adjustments.
- All appeals decisions are final.



Technical Assistance

- Available for MA organizations that need more training or specific assistance with data validation.
- CMS is considering other techniques to monitor risk adjustment data submissions and enhance communication efforts.
- Contact CMS staff.



Current Validation Activities

CY2003

- CMS is quality checking payment adjustment estimate tables.
- CMS will distribute estimate tables to applicable plans within the coming weeks.

CY2004

- Currently in the review process.

CY2005

- Sampling specifications are being developed.
- Anticipate the release of medical record requests to selected plans in February 2006.



Recommendations & Lessons Learned to Date

- Establish and maintain communication with providers.
 - Establish primary contact at physician's office in advance of request.
 - Determine provider requirements for sending medical records (e.g., advance payment).
 - Send complete CMS request to providers.
 - Follow up with physician's office after medical record request is sent.
- Use newsletters and CMS training tools to inform physicians about risk adjustment.



Recommendations & Lessons Learned to Date

(continued)

- Plan accordingly—may require more effort to obtain medical records from:
 - Specialists
 - Non-contracted providers
 - Hospital outpatient or PCP settings
- Consider having the provider indicate the date of service and diagnosis code.
- Involve internal quality assurance staff (e.g., medical record reviewers/medical director) to identify “one best medical record”.
- Submit complete medical records to CMS contractor as you receive them from providers.



Please take a moment to complete the evaluation form for the Risk Adjustment Data Validation Module.

Thank You!



Verifying Risk Scores

Presented by:
Aspen Systems Corporation





Purpose

- This module explains the systems involved in the risk score calculations and introduces MA organizations to a variety of verification tools available.



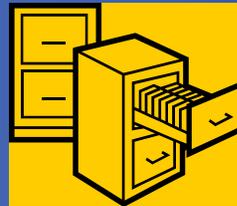
Objectives

- Understand the systems and processes used to calculate the risk scores.
- Determine how an organization can use risk adjustment processing and management reports to ensure the accuracy of payment.
- Identify the components and uses of the Non-Drug and Drug Monthly Membership Reports.
- Explain the Part C Risk Adjustment and RAS RxHCC Model Output Reports.

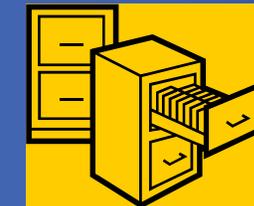
**What is the
Risk Score?**

Calculation of Risk Scores

STEP 1



MBD



MDS



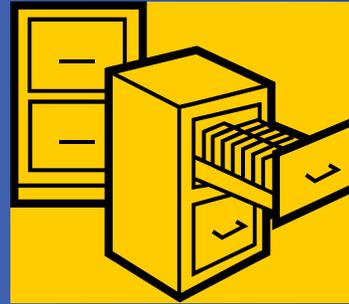
Beneficiary
Demographic
Input File



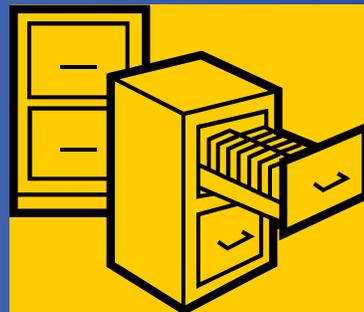
MDS Long-Term
Institutional File

Calculation of Risk Scores (continued)

STEP 2



RAPS Database

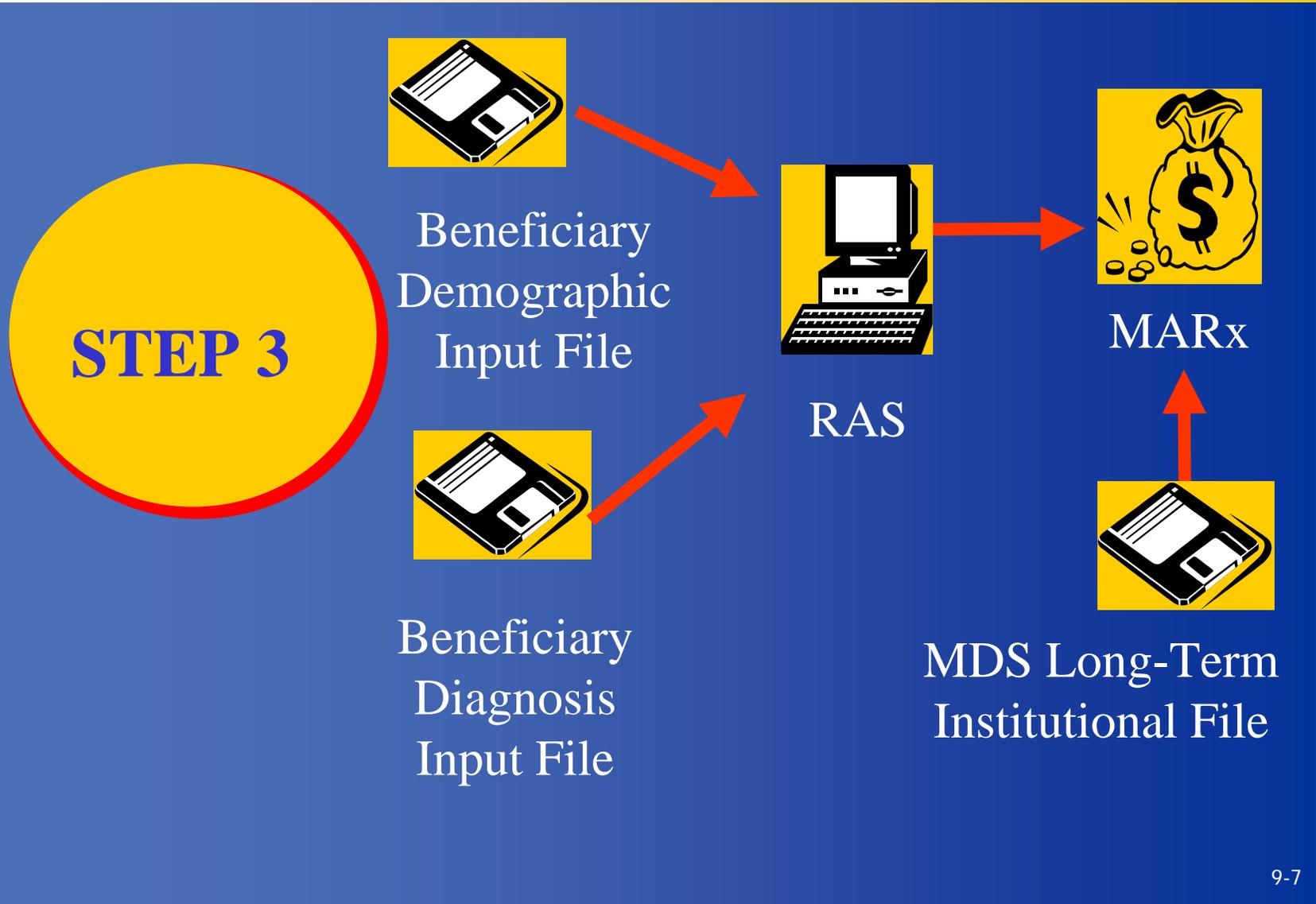


NMUD



Beneficiary
Diagnosis
Input File

Calculation of Risk Scores (continued)



Verification Tools

- RAPS Return File
- Raps Management Reports
- SAS Software CMS-HCC Model Program
- MMR
- MOR





RAPS Return File/RAPS Transaction Error Report

- Received the next business day after submission.
- Provides a record of each diagnosis stored for each enrollee.
- Allows results to be stored in a database (Microsoft Access or Excel) of diagnoses for each enrollee.
- Transaction Error Report requires manual updates to a diagnosis file.



Database Components

| HIC Number | Diagnosis | Date Submitted | Through Date |
|------------|-----------|----------------|--------------|
|------------|-----------|----------------|--------------|



RAPS Management Reports

- RAPS Monthly Report
- RAPS Cumulative Plan Activity Report
- Available second day of the month
- Provide the total number of diagnoses stored in the CMS-HCC model



CMS-HCC Model

- CMS runs the model on a semi-annual basis.
- MA organizations with SAS software may run the model to calculate their enrollee risk scores.
- SAS program is available at:
<http://cms.hhs.gov/>
 - Click on “Medicare” at the top
 - Click on “Health Plans”
 - Click on “Medicare Advantage Rates & Statistics”



Monthly Membership Report

- Reconciles Medicare Membership payment record.
- Available in two formats:
 - Detail
 - Non-Drug MMR
 - Drug MMR
 - Summary
- Generated by MARx.
- Beneficiary-level information.



Monthly Membership Report – Non-Drug

- Based on the CMS-HCC Risk Adjustment Model
- Contains Part A and B information



Monthly Membership Report - Drug

- Predicts drug costs other than Part A/B costs.
- Different diseases predict drug cost.
- Contains information on:
 - LICS percentages
 - LICS Subsidy



Monthly Membership Report Field Ranges

| Field Ranges | Descriptions |
|--------------|--|
| 1-3 | Managed Care Organization Information |
| 4-11 | Beneficiary Identification |
| 12-13 | Entitlement |
| 14-19 | Health Status |
| 20-35 | Risk Adjustment/Demographic Payment Adjustment Information |
| 36-44 | Additional Risk Adjustment Indicators |
| 45-74 | Fields added to support the Part D Benefit |



Risk Adjustment Model Output Reports

- Supplements the MMR report by identifying specific information used in making risk adjustment calculations:
 - HCC triggered for an individual
 - Disease and demographic interactions
- Two MORs:
 - Part C Risk Adjustment
 - RAS RxHCC
- Available through the MARx system.



Risk Adjustment MOR – Part C

- Displays:
 - HCCs used by RAS
 - Disease interactions
 - Demographic interactions



Risk Adjustment MOR – RAS RxHCC

- Displays:
 - RxHCC Disease Groups
 - Disease interactions
 - Demographic interactions



Summary

- Identified data systems used to calculate risk scores.
- Reviewed how reports can be used to verify risk scores.



Please take a moment to complete the evaluation form for the Verifying Risk Scores Module.

Thank You!