

### Encounter Data User Group Q&A Documentation

#### **Questions and Answers – April 4, 2013 Live Session**

# Q1: Has CMS changed the requirements for submission of void/delete encounters using a frequency code of '8' and the accepted ICN with all other data elements identical to the original encounter submission?

A1: CMS has not changed the requirements for submission of void/delete encounters. MAOs and other entities should submit void/delete encounters by populating Loop 2300 CLM05-3 = '8', REF01 = 'F8', and REF02 = ICN of the previously accepted encounter. The void/delete encounter must also include all of the additional data elements populated on the original encounter.

### Q2: What is CMS' business rationale for applying the same EDPS edits to a void/delete encounter that are applied to an original encounter?

A2: The EDS should not apply the same editing logic to a void/delete encounter as it does to an original encounter. CMS will conduct further research on the editing logic used for processing void/delete encounters to ensure that the encounter data functional requirements are mapping appropriately to the encounter data business requirements. MAOs and other entities are encouraged to submit questions regarding specific examples regarding void/delete encounter errors to <u>eds@ardx.net</u> for research and resolution.

### Q3: For providers that render services for Medicare and Medicaid as a secondary carrier, should MAOs or other entities include the Medicaid amounts on encounter submissions?

A3: MAOs and other entities should not include any Medicaid only services or Medicaid dollar amounts on encounter submissions. Guidance for regarding Medicaid encounter data is located in the EDS Participant Guide published on the CSSC Operations website at <a href="http://www.csscoperations.com">http://www.csscoperations.com</a>. MAOs and other entities can also contact CSSC with additional questions regarding Medicaid data submission at <a href="http://csscoperation@palmettogba.com">csscoperation@palmettogba.com</a>.

Similar questions are not listed separately, but combined and published as one question with one answer.



### Q4: Will CMS accept the Skilled Nursing Facility (SNF) default Health Insurance Prospective Payment System (HIPPS) code of 'AAA00' as a default HIPPS code for Home Health (HH) encounters?

A4: As an interim option for submission of true HIPPS codes for SNF and HH encounters, MAOs and other entities may submit the default HIPPS code of 'AAA00' prior to submission of July 2013 DOS. However, MAOs and other entities are encouraged to populate HH encounters using the appropriate HIPPS code and not the default code. MAOs and other entities must populate the true HIPPS code for encounters with July 2013 DOS and beyond.

### Q5: For HH submission requirements effective July 2013, should MAOs and other entities populate the effective date using the discharge date or the admit date?

A5: MAOs and other entities should populate the effective date using the admit date when submitting HH encounters.

# Q6: If an MAO or other entity receives an original encounter and an adjustment encounter within the same reporting period, should the MAO or other entity only submit the adjustment encounter to the EDS if the original encounter has not been submitted to the EDS prior to receipt of the adjustment encounter?

A6: If an MAO and other entity received an original encounter and an adjustment encounter in the same reporting period, the MAO and other entity may submit only the adjusted encounter to the EDS. If an MAO or other entity received, adjudicated, and submitted an original encounter, all subsequent adjustment encounters should be re-adjudicated and submitted to the EDS.

#### Q7: If an MAO or other entity submits an encounter with four (4) diagnosis codes and then receives an adjustment from the provider that lists only three (3) diagnosis codes, should the MAO and other entity submit the adjustment encounter as a void/delete or as a correct/replace?

A7: If an MAO or other entity receives an adjustment from a provider to add or delete specific data elements (i.e., diagnosis codes), the MAO or other entity should submit a correct/replace encounter identifying the corrected data in the appropriate field(s) and populating Loop 2300 CLM05-3='7', REF01='F8', and REF02=ICN of the previously accepted encounter. The EDPS will process and price the encounter based on the correct/replace encounter and flag the original encounter as "inactive" and the correct/replace encounter as "active". A void/delete encounter is submitted when MAOs and other entities determine that a previously submitted and accepted encounter must be completely voided from the EDS.

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### Q8: Has CMS reached a resolution on whether the 2013 data will be used for 2014 payments or will CMS continue to use RAPS data for the 2014 payments?

A8: CMS has not reached a final decision regarding the use of 2013 encounter data for 2014 payments. CMS will notify MAOs and other entities once decisions are finalized.

#### Q9: Does CMS accept Type of Bill (TOB) 73x for Federally Qualified Health Centers (FQHCs)?

A9: No. CMS no longer accepts TOB 73X for FQHC services. For dates of service on or after April 1, 2010, all FQHC services must be submitted on a TOB 77X.

### Q10: Do the requirements for submission of TOB 73x differ for Medicare Advantage than for Fee For Service (FFS)?

A10: The guidance mandated by CMS, effective April 1, 2010, to discontinue using TOB 73x applies to both Medicare Advantage and FFS plans.

# Q11: Can CMS provide a parseable listing of Professional and Institutional EDPS edits (i.e., Excel spreadsheet) to identify updates to the edits generated on the MAO-002 reports and their complete descriptions?

A11: CMS will consider the possibility of providing an Excel file format, containing both Professional and Institutional EDPS edits for MAOs and other entities to reference and parse.

# Q12: If a new edit is added or deleted after an MAO or other entity receives an MAO-002 Report with rejections, should the MAO or other entity resubmit previous encounters to ensure that the encounters will not reject based on the updated edits?

A12: MAOs and other entities are encouraged to submit encounters to the Tier II testing environment to verify that the encounter submissions will pass the EDPS editing logic. All edits in production are also programmed into the Tier II testing environment.

### Q13: Are the requirements for the weekly submission frequency based on a calendar week or a floating week?

A13: For the weekly submission frequency requirements, CMS measures a week from Saturday to Friday.

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#### Q14: If MAOs and other entities submit encounters according to the submission frequency schedule and experience an internal system failure, will MAOs and other entities be considered out of compliance if there is a delay in encounter submissions due to the system failure?

A14: CMS has not yet determined the implementation of submission frequency compliance measures. CMS will continue monitoring submission frequency based on the February 2013 HPMS enrollment data. After analysis of the monitored submission frequency, CMS will determine and communicate an implementation plan for compliance.

### Q15: Are MAOs and other entities required to populate Loop 2300, CL103 with the patient status code if the provider does not identify the code on the submitted claim?

A15: According to the Technical Report Type 3 (TR3) and the CEM Edits spreadsheet, Loop 2300 CL103 is a required minimum data element and must be populated with a valid code in order to pass Encounter Data Front-End System (EDFES) edits. CMS is currently researching and analyzing the minimum required data elements and encourages MAOs and other entities to send specific examples of issues with submission of the minimum data elements, including loops and segments in question, to eds@ardx.net for research.

### Q16: Should EDFES 999 Acknowledgment Reports distributed to MAOs and other entities always include an IK5 segment?

A16: Yes, the IK5 segment should always be present on a 999 Acknowledgement Report. CMS is researching why some MAOs and other entities are receiving 999 Acknowledgment Reports with missing IK5 segments. CMS will provide a response to the industry after further analysis is complete.

### Q17: Does CMS plan to re-implement the EDPS edits code lookup tool that was previously posted on the CSSC Operations website?

A17: CMS is currently working to implement an EDPS edit lookup page on the CSSC Operations website. CMS will provide further information once it is available.

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