

2019 Final Risk Adjustment Data Submission Run 01/31/2020 Deadline

Overpayment Run Submission Deadline* 06/30/2020 Deadline

Scenario: A Medicare Advantage Organization (MAO) initially submits an encounter data record prior to the PY 2019 final risk adjustment data submission deadline with diagnoses DxA and DxB. Shortly after, the MAO submits a replacement record that includes both DxA and DxB but has a CPT/HCPCS code that is not allowed. After the original deadline but before the overpayment deadline the MAO submits a new replacement record that changes the CPT/HCPCS code back to the original.

Encounter Data Submission						MAO-002	MAO-004							Payment Designation		Description
ICN	Date of Service	Date of Encounter Data Submission	Encounter Type	CPT/HCPCS Code	Diagnoses Included in Encounter	Preliminary Allow/Disallow Reason Code	Service Type	Allow/Disallow Flag	Allow/Disallow Reason Code	Diag 1	Add/Delete 1**	Diag 2	Add/Delete 2**	Diagnoses Included in Payment***	Diagnoses Removed from Payment	
1000	1/15/2018	2/1/2018	1	CxxxA	DxA, DxB	PA	O	A	-	DxA	A	DxB	A	DxA, DxB	-	MAO submits an original encounter before the PY 2019 final risk adjustment data submission deadline. The encounter includes CPT/HCPCS code CxxxA, and diagnoses DxA and DxB. The MAO-002 will report this record as preliminarily allowed ("PA") and the MAO-004 will report this record as allowed ("A") because the record is linked to an allowed CPT/HCPCS code. The MAO-004 will indicate that DxA and DxB are in "Add" status ("A"). Since these diagnoses were added prior to the PY 2019 final risk adjustment data submission deadline, and are risk adjustment eligible (see the December 22, 2015 HPMS memo, <i>Final Encounter Data Diagnosis Filtering Logic</i>), they will be included in the PY 2019 final risk adjustment reconciliation payment.
1001	1/15/2018	2/15/2018	3	CxxxB	DxA, DxB	PD/PH	O	D	H	DxA	A	DxB	A	-	DxA, DxB	MAO submits a replacement record before the PY 2019 final risk adjustment data submission deadline. This replacement record changes the CPT/HCPCS code to CxxxB. The MAO-002 will report this record as preliminarily disallowed ("PD") with the reason code indicating that the CPT/HCPCS code was not allowable ("PH") and the MAO-004 will report this record as disallowed ("D") with the reason code indicating that the CPT/HCPCS code was not allowable ("H"). The MAO-004 will still indicate that DxA and DxB are in "Add" status ("A"). DxA and DxB will be removed from the PY2019 final risk adjustment payment. Although the replacement record indicated both diagnoses are in "Add" status, they will not be included in the PY 2019 final risk adjustment reconciliation payment because they were disallowed due to the CPT/HCPCS code on the replacement record (see the December 22, 2015 HPMS memo, <i>Final Encounter Data Diagnosis Filtering Logic</i>).
1002	1/15/2018	3/1/2020	3	CxxxA	DxA, DxB	PD/PD	O	D	D	DxA	A	DxB	A	-	-	MAO submits another replacement record after the PY 2019 final risk adjustment data submission deadline, but before the overpayment run submission deadline. The replacement record changes the CPT/HCPCS code back to CxxxA, and maintains DxA and DxB. The MAO-002 will report this record as preliminarily disallowed ("PD") with the reason code indicating that the record was submitted after the PY 2019 final risk adjustment data submission deadline ("PD") and the MAO-004 will report this record as disallowed ("D") with the reason code indicating the record was submitted after the PY 2019 final risk adjustment data submission deadline ("D"). The MAO-004 will indicate that DxA and DxB are in "Add" status ("A"). Despite the updated CPT/HCPCS code on this replacement being an acceptable code per the December 22, 2015 HPMS memo, <i>Final Encounter Data Diagnosis Filtering Logic</i> , diagnoses DxA and DxB will not be eligible for payment because they were removed due to an ineligible CPT/HCPCS code in the prior record and then re-added through a replacement record after the PY 2019 final risk adjustment data submission deadline (see 42 CFR 422.310g(2)(ii)- <i>After the final risk adjustment data submission deadline, which is a date announced by CMS that is no earlier than January 31 of the year following the payment year, an MA organization can submit data to correct overpayments but cannot submit diagnoses for additional payment</i>).

* The PY2019 overpayment run has not been scheduled. This overpayment submission deadline is for sample purposes only.

** A diagnosis that is deemed in "Add" status will be included for informational purposes and does not necessarily mean the diagnosis has been included for payment.

*** Diagnoses included in payment assume each encounter row is the final encounter data record.