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WHAT'S NEW WITH ENCOUNTER DATA?

The Encounter Data System (EDS) is wrapping up an eventful year with implementation, testing, and many system improvements! MAOs and other entities can find the latest information in this edition of the Quarterly Newsletter to prepare for 2013.

➤ **Operational Guidance**

Learn more about SNF and HH submission requirements, and EDS file size limitations.

➤ **Policy & Compliance**

Determine whether your organization has met certification and next steps for compliance.

➤ **Errors and Resolutions**

Ensure your system is up-to-date with the latest edit prevention and resolution strategies.

➤ **Best Practices From The Industry**

Discover how to prepare files for optimal system processing.

➤ **Special Feature**

Learn how others are passing EDFES edits.

➤ **Test Your EDS IQ**

Measure your knowledge with this quick quiz on various EDS topics.

➤ **Resources**

Be informed of the list of growing EDS resources.

Operational Guidance

Skilled Nursing Facility (SNF) & Home Health (HH)

SNF/HH edits were released for industry review and feedback on October 18, 2012. All MAO and other entities' comments were incorporated, as applicable, for processing the edits in the Encounter Data Processing System (EDPS). While it is not required, MAOs and other entities began submitting Tier 2 SNF/HH Test data on **December 7, 2012**, along with SNF/HH Production data.



The submission of **Health Insurance Prospective Payment System (HIPPS)** codes is not required for 2012 SNF/HH encounter data. **Beginning July 2013**, CMS is requiring MAOs and other entities to submit HIPPS codes in order to accurately price SNF/HH encounter data. MAOs and other entities should begin preparing system updates in preparation for HIPPS data collection in 2013. Questions regarding HIPPS data collection may be sent to eds@ardx.net.

Submission File Size Limitations

In 2012, CMS was able to successfully implement the EDS through frequent, open communication with MAOs and other entities, which allowed for enhanced system processing.

Through continuous review and analysis, CMS determined the most effective file size limitation for Institutional encounter data submission is **no more than 5,000 encounters per ISA/IEA (file)**. Multiple files may be sent in a single transmission. MAOs and other entities are **required** to submit no more than 5,000 encounters per file. Additional details are included in the November release of the EDS Companion Guide located on the CSSC Operations website, www.csscoperations.com.

Policy & Compliance

In January 2012, CMS implemented the Encounter Data System (EDS) to collect, process, price and store encounter data. Section 42 C.F.R. §422.310(d) stipulates that MAOs are required to submit encounter data for each item and service provided to an MA enrollee. At this time, all MAOs and other entities should be EDS end-to-end certified for Institutional, Professional, and DME services. CMS distributed compliance notification letters to MAOs and other entities on December 4, 2012. **MAOs and other entities are required to respond to the memo by no later than December 14, 2012**, with a status and plan of action for meeting certification requirements.

Errors and Resolutions

Under the **EDPS Edits Prevention and Resolution plan, three (3) phases** of analysis were implemented that resulted in the most commonly occurring edits and their prevention methods.

- **Phase I** identified the most frequently occurring edits specific to Institutional, Professional, or DME subsystem modules. Phase I edits were published in the October release of the Encounter Data Companion Guides.
- **Phase II** identified the most frequently occurring edits that impact all subsystems, with the Top 5 edits listed below. A complete list of the frequently occurring EDPS edits and resolutions were published in the current release of the Encounter Data Companion Guides.
- **Phase III** will incorporate all remaining EDPS edits and resolutions and will be published in the Encounter Data Companion Guides.

Table 1. Top 5 Frequently Occurring Edits from Phase II Analysis

Error Code #	Error Code Description	Comprehensive Prevention/Resolution
02110	Beneficiary Health Insurance Carrier Number (HICN) Not on File	Verify that the HICN populated on the encounter is valid in the MARx database.
02125	Beneficiary Date Of Birth Mismatch	Verify that the DOB populated on the encounter is accurate and matches the DOB listed in the MARx database.
02240	Beneficiary Not Enrolled in Medicare Advantage Organization For Date Of Service	Verify that the beneficiary was enrolled in the MAO during the DOS on the encounter.
02255	Beneficiary Not Part A Eligible For Date Of Service	Verify that the beneficiary was enrolled in Part A for the DOS listed on the encounter.
98325	Exact Duplicate of a Service Line within this Claim or a Previously Priced Claim	Verify that the encounter was not previously submitted. If not a duplicate encounter, ensure that elements validated by duplicate logic are not the same (refer to the EDS Companion Guides for duplicate logic validation elements).

Best Practices From The Industry

During a Technical Assistance outreach call in 2012, an MAO provided the following best practice as an approach to ensure encounter data submissions are timely and accurate:

1. Evaluate

The MAO or other entity carefully examines EDS acknowledgment and processing reports (TA1, 999, 277CA, and MAO-002) for edit errors prior to resubmissions.

2. Analyze

The MAO or other entity analyzes results of the EDS acknowledgment and processing reports (TA1, 999, 277CA, and MAO-002) and determines any trends in the errors generated on the reports, i.e. beneficiary edits, duplicate edits, etc. to determine the root cause of the issues.

3. Correct

The MAO or other entity corrects their system as appropriate, processes the files again through the internal system to test the file submission, and then resubmits the errors to EDPS for reprocessing.

Do you have a best practice or success strategy to share? Please send suggestions to CMS at eds@ardx.net.



Special Feature

TA1-999R Edits

The EDFES processes encounters through the Fee-for-Service (FFS) translator and Common Edits and Enhancements Module (CEM). Files must pass translator and CEM edits prior to transmission to EDPS for processing, pricing, and storage. If translator level errors occur, MAOs and other entities will receive acknowledgment reports (TA1 and 999R) and must resubmit the entire file for re-processing. CMS publishes the CEM edits spreadsheets, updated on a quarterly basis, which provides translator and CEM level editing logic. MAOs and other entities should reference the CEM edits spreadsheet to resolve EDFES edits and program their system accordingly to prevent future errors. The CEM edits spreadsheets can be found at the following link:

<http://www.cms.gov/Medicare/Billing/MFFS5010D0/Technical-Documentation.html>.

MAOs and other entities should also refer to the following resources located on the CSSC Operations website for guidelines on the successful submission of encounter data through the EDFES

www.csscooperations.com:

- **EDS Companion Guides** provides TA1 and 999 report descriptions and details.
<http://www.csscooperations.com/internet/cssc3.nsf/docsCat/CSSC~CSSC%20Operations~Encounter%20Data~Companion%20Guides?open&expand=1&navmenu=Encounter^Data>
- **2012 Encounter Data Participant Guide** provides reports overviews, acknowledgement report to 837 mapping, segments, and examples.
<http://www.csscooperations.com/internet/cssc3.nsf/docsCat/CSSC~CSSC%20Operations~Encounter%20Data~Training%20Information?open&expand=1&navmenu=Encounter^Data>
- **2012 Encounter Data User Group Presentation Slides – November 29, 2012** provides frequently occurring errors and the editing logic to assist MAOs and other entities with error preventions and resolution.
<http://www.csscooperations.com/internet/cssc3.nsf/docsCat/CSSC~CSSC%20Operations~Encounter%20Data~User%20Groups?open&expand=1&navmenu=Encounter^Data>.

Test Your EDS IQ

- Q1.** If an MAO or other entity has a contract ID that ended on July 1, 2012 and the beneficiaries are transferred to another contract under the same MAO, are 2012 encounter data submissions required to be submitted for the terminated contract?
- Q2.** If a correct/replace encounter (CLM05-3 = '7') is submitted for an original encounter and there is also a linked chart review associated with the original encounter, will the linked chart review be associated with the correct/replace encounter?
- Q3.** How long do MAOs and other entities have after the claim adjudication date to submit correct/replace or void/delete encounters?
- Q4.** Where can MAOs or other entities find the minimum data elements that are required for the submission of the encounter data on the 837-I or 837-P and what is the difference between "required" and "situational" data elements?



(Answers can be found on page 4.)

Test Your EDS IQ - Answers

(Questions can be found on page 3.)



A1. MAOs and other entities must continue to submit encounter data for 2012 dates of service through the 13 months after July 1, 2012. MAOs and other entities still under contract through January 1, 2013 are required to submit encounter data for 2012 dates of service.

A2. If a replacement encounter (CLM05-3 = '7') is submitted for an original encounter already associated with a linked chart review, the linked chart review records will then be associated with the new replacement encounter.

A3. If the DOS is 01/01/12, then the timely filing deadline is 2/01/13 for correct/replace or void/delete encounters. If the claim is adjudicated on 1/02/13, to remain in compliance, the timely filing deadline remains 2/02/14. The additional 30 days is invoked when an adjustment (correct/replace or void/delete) is performed close to the original timely filing deadline. For example, if the same claim was adjusted on 1/20/13, then the correct/replace or void/delete submission deadline is extended an additional 30 days to 2/20/13 to remain in compliance.

A4. Regardless of the encounter submission type, there is a list of minimum data elements that are required for the submission of encounter data. Data elements listed as "situational" are required to be submitted only when specific conditions apply, either due to TR3 rules or to encounter data business requirements. Data elements listed as "required" must be submitted for all encounter data submissions. The Encounter Data Minimum Data Elements can be found on the CSSC Operations website www.cssoperations.com under the "Resources" item, in the left navigation menu.

Resources

Encounter Data System Information

www.cssoperations.com

cssoperations@palmettogba.com

Risk Adjustment Model Diagnoses

http://www.cms.gov/Medicare/Health-Plans/MedicareAdvtgSpecRateStats/Risk_adjustment.html

X12 Version 5010 Standards

<https://www.cms.gov/Regulations-and-Guidance/HIPAA-Administrative-Simplification/Versions5010andD0/index.html?redirect=/Versions5010andD0/>

CEM/CEDI Technical Reporting Formats

http://www.cms.gov/MFFS5010D0/20_TechnicalDocumentation.asp

Washington Publishing Company

<http://www.wpc-edi.com/content/view/817/1>

CMS

www.cms.gov

EDS Inbox

eds@ardx.net

QUESTIONS?



For questions regarding the Encounter Data Quarterly Newsletter, please contact eds@ardx.net.

The *Encounter Data Quarterly Newsletter* is a CMS publication providing an overview of the latest developments in encounter data system operations, policies, and guidelines. For further information about the Encounter Data System, please visit www.cssoperations.com.