



# **Encounter Data**

## **WORK GROUP**

# **PACE WORK GROUP 2012**



# **Encounter Data**

## **WORK GROUP**

## **Session Guidelines**

- This is a two (2) hour working session for PACE Organizations.
- We encourage active participation in the session. When participating, clearly state your name and organization, in case follow-up correspondence is required.
- The purpose of this working session is to provide a forum for communication between CMS and PACE Organizations to determine and discuss issues while creating possible solutions for implementation of Encounter Data.



# **Encounter Data**

## **WORK GROUP**

# **PACE Recommendations**

CMS has received recommendations from PACE Organizations for encounter data submission considerations.

- CMS to assist PACE organizations in obtaining products/software or data collection tools necessary for encounter data submission and processing
- Continue RAPS for PACE Organization use only
- Use the 837-I and 837-P to submit diagnostic data only
- Delay the encounter data timeline for PACE Organizations
- Specific training for PACE Organizations
- Create a customized coding system for PACE specific services
- Evaluate the percentage of beneficiaries enrolled in PACE Organizations to determine if collection of encounter data is necessary for PACE Organizations



# **Encounter Data**

## **WORK GROUP**

## **Unique PACE Characteristics**

- Medicare compliant Fee-For-Service claims are not generated since payments are not made on this basis by the PACE Organizations (POs). If CPT/HCPCS coding is required, documentation requirements will expand substantially to include notes to justify E&M and other codes consistent with Fee-For-Service requirements.
- PACE Organizations provide services/items that are not otherwise covered by Medicare or Medicaid but are determined necessary.
- CPT codes for physician office visits may not accurately represent the time, variety and intensity of services provided by PACE primary care providers due, in part, to the characteristics and needs of the PACE enrollee population.



# **Encounter Data**

## **WORK GROUP**

## **Unique PACE Characteristics**

- Because the POs substitute for other settings of care where services are provided repeatedly throughout the day, restrictions on duplicate encounters will be an issue in PACE.
- Skilled Nursing services provided by POs may substitute for Skilled Nursing services otherwise provided through a home health agency or in an institutional setting.
- Costs associated with the PACE model of care are not accurately reflected in the standard coding and pricing models.



# **Encounter Data**

## **WORK GROUP**

## **Unique PACE Characteristics**

- If only Medicare-covered services are included in the recalibration, the costs associated with PACE participants' diagnoses are underrepresented.
- Depending on how the encounter data reporting requirement is defined, PACE Organizations will be required to distinguish between Medicare and non-Medicare covered services. This may be in the context of therapy services and services provided in the home.



# **Encounter Data**

## **WORK GROUP**

## **Identified Issues**

Based on the unique PACE characteristics, the following are issues to address for the success of encounter data.

- Absence of CPT/HCPCS Codes - CPT Codes do not represent variety and intensity of PACE services
- Common Submission of Non-Medicare Services
- Duplicate Encounter Submission Logic
- Accurate Pricing
- Smaller Organizations with limited system capability



# **Encounter Data**

## **WORK GROUP**

## **Potential Solutions**

- Absence of CPT/HCPCS Codes – CPT Codes do not represent variety and intensity of PACE services
  - Are PACE Organizations collecting information on these services?
  - What types of services are involved?



# **Encounter Data**

## **WORK GROUP**

## **Format**

- PACE organizations are required to submit encounter data using the HIPAA compliant 5010 format.
- The use of HCFA 1500 or UB04 paper claims will not be acceptable for encounter data.
- EDI support software applications can be used to convert paper claims to electronic format.



# **Encounter Data**

## **WORK GROUP**

## **PC ACE Pro-32**

- PC-ACE Pro32 Software is available to assist PACE Organizations with the transfer of paper claims data to the 5010 format.
- PC-ACE Pro 32 is a Windows-based system for electronic claims submission in the 5010 format.
- The PC-ACE User's Manual specific to encounter data submissions is listed below:

[http://www.palmettogba.com/Palmetto/Providers.nsf/files/EDI\\_PCACE\\_Pro32\\_Man.pdf/\\$File/EDI\\_PCACE\\_Pro32\\_Man.pdf](http://www.palmettogba.com/Palmetto/Providers.nsf/files/EDI_PCACE_Pro32_Man.pdf/$File/EDI_PCACE_Pro32_Man.pdf)



# **Encounter Data**

## **WORK GROUP**

## **Minimum Data Elements**

- The minimum data elements required in order to pass Encounter Data System (EDS) translator and CEM level edits are available at [www.csscooperations.com](http://www.csscooperations.com).
- Of the total minimum data elements, approximately 2/3 are specific to the electronic submission of the file.
  - Operational guidance is provided in the TR3, CEM edits spreadsheets, and EDS Companion Guide.



# **Encounter Data**

## **WORK GROUP**

## **Potential Solutions**

- Common Submission of Non-Medicare Services
  - Medicaid Services
  - Atypical Provider Guidance



# **Encounter Data**

## **WORK GROUP**

## **Atypical Provider Submission**

- An Atypical Provider is defined as an individual or business that bills for services rendered but does not meet the definition of a healthcare provider according to the NPI Final Rule 45 CFR 160.103 (e.g., non-emergency transportation providers, Meals on Wheels, personal care services, etc).
- Atypical Providers do not receive NPIs; therefore, default Atypical Provider NPIs have been generated for encounter data purposes.



# **Encounter Data**

## **WORK GROUP**

## **Potential Solutions**

- Duplicate Encounter Submission Logic – because of integrated care, providers may see PACE patients several times in one day for the same service.
  - CMS is exploring the option of a PACE-specific duplicate check/flag



# **Encounter Data**

## **WORK GROUP**

## **Potential Solutions**

- Accurate Pricing – Services may cost more for PACE Organizations because they are more intense/individualized
  - Describe services
  - What are the specific differences from MA?
  - How do we account for this in pricing?
  - How can we collect and code the differences?



# **Encounter Data**

## **WORK GROUP**

## **Potential Solutions**

- Smaller Organizations - fewer encounters are submitted due to staff model structure.
  - The schedule for PACE Organization encounter data submission has been extended one year beyond the current encounter data submission schedule.

**Encounter Data  
WORK GROUP**

**Certification Timeline**

|                          | Testing Begins | EDPS Testing    | Deadline for Initial Submission of Encounters * | Testing Ends/Deadline for Certification |
|--------------------------|----------------|-----------------|---|---|
| Front End Certification  | 9/13/12        |                 |   | 1/02/13                                 |
| Professional Encounters  | 1/03/13        | Test cases only | 2/28/13*  | 3/29/13                                 |
| Institutional Encounters | 4/01/13        | Test cases only | 4/30/13*  | 5/30/13                                 |
| DME Encounters           | 5/07/13        | Test cases only | 6/03/13*  | 7/02/13                                 |

\*PACE Organizations must make an initial submission to the EDPS by this date.



# **Encounter Data WORK GROUP**

## **Submission Resources**

| <b>Resource</b>                       | <b>Purpose</b>  | <b>Source</b>   |
|---------------------------------------|---|---|
| <b>TR3</b>                            | Serves as the primary reference for electronic file submission  | <a href="http://www.wpc-edi.com">www.wpc-edi.com</a> (must be purchased by organization)  |
| <b>CMS CEM Edits Spreadsheet</b>      | Provides more detailed information on electronic file submission edits  | <a href="https://www.cms.gov/MFFS5010D0/20_TechnicalDocumentation.asp">https://www.cms.gov/MFFS5010D0/20_TechnicalDocumentation.asp</a>   |
| <b>Encounter Data Companion Guide</b> | Provides encounter data specific guidance and must be used in conjunction with the associated TR3 and CEM edits spreadsheet | <a href="http://csscooperations.com/internet/Cssc.nsf/files/Jan_Release_EDCompanionGuide_837P_010912.pdf/\$File/Jan_Release_EDCompanionGuide_837P_010912.pdf">http://csscooperations.com/internet/Cssc.nsf/files/Jan_Release_EDCompanionGuide_837P_010912.pdf/\$File/Jan_Release_EDCompanionGuide_837P_010912.pdf</a> |



# **Encounter Data**

## **WORK GROUP**

# **QUESTIONS & ANSWERS**



# **Encounter Data**

## **WORK GROUP**

## **Resources**

- X12 Version 5010 Standards:  
[http://www.cms.gov/Version5010andD0/01\\_overview.asp](http://www.cms.gov/Version5010andD0/01_overview.asp)
- CEM/CEDI Technical Reporting Formats:  
[http://www.cms.gov/MFFS5010D0/20\\_TechnicalDocumentation.n.asp](http://www.cms.gov/MFFS5010D0/20_TechnicalDocumentation.n.asp)
- Washington Publishing Company:  
<http://www.wpc-edi.com/content/view/817/1>



# **Encounter Data**

## **WORK GROUP**

## **Resources**

- PACE Manual:  
<http://www.cms.gov/PACE/Downloads/R1SO.pdf>
- CSSC Operations:  
<http://www.csscoperations.com/internet/cssc.nsf/Home>
- Encounter Data Outreach Registration: [www.tarsc.info](http://www.tarsc.info)
- CMS: [www.cms.gov](http://www.cms.gov)
- EDS Inbox: [eds@ardx.net](mailto:eds@ardx.net)



# **Encounter Data**

## **WORK GROUP**

## **Work Group Schedule**

- The next PACE Work Group session will be communicated to the PACE industry as soon as the date becomes available.



# **Encounter Data**

## **WORK GROUP**

# **CLOSING REMARKS**