
Encounter Data Compliance Special User Group Session Q&A Documentation

Questions and Answers – February 16, 2012 Question & Answer Session

Q1: When will CMS provide guidance for submission of paper claims?

A: Paper Claims operational guidance will be provided in detail during a March 2012 User Group session.

Q2: To what department in the Medicare Advantage Organizations (MAOs) will CMS send Compliance notices?

A: CMS submits all compliance notices to the MAO Compliance Officers and carbon copies other MAO staff indirectly involved with compliance standards.

Q3: Will CMS provide a schedule for the EDPS compliance notices?

A: CMS has not yet published a schedule for EDPS compliance. Additional discussions regarding EDPS compliance will be scheduled with MAOs and other entities in the future.

Q4: Has there been any additional discussion regarding extending the compliance timeline for timely filing for correcting or deleting encounters?

A: CMS is evaluating the schedule for timely filing for correcting and/or deleting encounters. Further information will be provided once decisions are finalized.

Q5: Does Encounter Data compliance include both Part C and Part D encounter data?

A: This Encounter Data Compliance session addresses Part C only.

Q6: If an MAO is new to Medicare as of 2012, what is CMS' expectation regarding compliance for testing, certification, and production?

A: The first step for new MAOs is to ensure that connectivity is established to the Encounter Data Front-End System (EDFES) and to submit the required encounters for front-end and end-to-end certification. Once certification is achieved, new MAOs may begin submitting any encounters that are received. Test Case Scenarios and Business Cases are posted at www.csscooperation.com and will assist in submission of front-end and end-to-end certification data. The Business Cases are populated in the January 2012 release of the Professional Companion Guide in Section 9.0.

837-P Test Case Specifications -

[http://cssoperations.com/internet/Cssc.nsf/files/EncounterDataTestCaseSpecs_837P_012312.pdf/\\$File/EncounterDataTestCaseSpecs_837P_012312.pdf](http://cssoperations.com/internet/Cssc.nsf/files/EncounterDataTestCaseSpecs_837P_012312.pdf/$File/EncounterDataTestCaseSpecs_837P_012312.pdf)

Business Cases

[http://cssoperations.com/internet/Cssc.nsf/files/Jan_Release_EDCompanionGuide_837P_010912.pdf/\\$File/Jan_Release_EDCompanionGuide_837P_010912.pdf](http://cssoperations.com/internet/Cssc.nsf/files/Jan_Release_EDCompanionGuide_837P_010912.pdf/$File/Jan_Release_EDCompanionGuide_837P_010912.pdf)

Q7: What is the compliance timeframe for PACE organizations? Will CMS issue additional guidance for PACE organizations?

A: CMS has scheduled a Work Group for policy and operational guidance for PACE organizations in March 2012. Additional information will be published in the coming weeks.

Q8: What is the requirement for MAOs and other entities that receive 4010 claims during the 90-day non-enforcement period?

A: The Encounter Data Proposed Minimum Data Elements documentation was released today to the industry. MAOs and other entities should review the documentation and provide comments on the minimum data elements using the tool provided. All responses should be submitted to eds@ardx.net. CMS will evaluate MAO and other entities' recommendations and release the final minimum data elements.

Q9: Is the current certification compliance action for front-end certification only?

A: Yes. The compliance schedule for end-to-end testing will be provided to MAOs and other entities in a notice separate from front-end certification.

Q10: There has been communication in the industry that the Encounter Data Processing System (EDPS) has recognized errors in the edits and has discontinued processing encounters. How will MAOs achieve certification if their files are not processed?

A: The EDPS has not suspended or discontinued the processing of encounter data submitted through their system. CMS is working with the EDPS to correct these errors. MAOs and other entities should continue to submit test data for certification

Q11: In order to have test files transmitted to the EDPS, all 38 of the required encounters must be submitted in File 1. If any of the encounters are rejected in the file, would the MAO or other entity be required to resubmit all 38 encounters or would there ever be a scenario where four (4) encounters in the file rejected and only four (4) encounters were resubmitted?

A: In the initial submission of the test file, all required encounters must be present in order to process the file. After the initial file is accepted through the EDFES, the MAO and other entity may reconcile the rejected encounters and resubmit only those corrected encounters.

Q12: If MAOs or other entities experience system limitations that will not allow them to submit production data until all testing certification is achieved (professional, institutional and DME), will this cause any compliance concerns in terms of submitting production data after certification is achieved?

A: With consideration to the compliance timeline, it is likely that the system limitations will result in noncompliance.

Q13: Regarding the 13 month timely filing rule. There have been instances where a beneficiary would present their red, white, and blue Medicare card to an out of network provider instead of the MAO Medicare card. That out of network provider used 12 months to file with FFS. That claim would then get denied and the provider would bill the MAO. This provider now has an additional 12 months to bill the MAO. If encounters can be sent up to 13 months from adjudication, then that claim would be outdated before the MAO receives it.

A: Encounters must be submitted within 13 months from the date of service of the claim. CMS will take into consideration this scenario and will provide further clarification during the next User Group call.