

Medicare Cost Report e-Filing System Webcast


Moderated by: Diane Maupai
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Operator: Hello and welcome to today's Medicare Learning Network® Event. My name is Jen, and I'll be your web event specialist today.

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It is now my pleasure to turn today's program over to Diane Maupai. Diane, the floor is yours.

Announcements & Introduction

Diane Maupai: Thank you, Jen. This is Diane Maupai from the Provider Communications Group at CMS in Baltimore, and I'll be your moderator today. Welcome to this Medicare Learning Network webcast on the Medicare Cost Reporting e-Filing System. Before we get started, there are a few housekeeping items.

Today's event uses webcast technology. We recommend streaming the audio live through your computer speakers. If you are participating via webcast, you can download a copy of today's slide presentation by clicking the blue button – blue Files button at the bottom left side of your screen. Please note that this event is being recorded and transcribed.


Our speakers today are Linda Uzzle, Director of the Division of Provider Audit Operations, CMS, and Patrick Herrity, Business Consultant, CGI Federal. I'll now turn the call over to Linda.

Presentation

Linda Uzzle: Thanks, Diane. Hi. My name is Linda Uzzle, and I'm the Director of Provider Audit Operations – Division of Provider Audit Operations. And this is an exciting time for us that we are introducing a new system where providers for the first time can electronically submit their cost report 100 percent.

And when we look at a little bit of the past, we receive about 50,000 cost reports annually. We have 12 MACs who have various websites that have how to submit your cost report, where to mail your cost report, where to hand-deliver your cost report, and where to send the check.

And we know that this is – it's confusing and overly burdensome, especially when we have a consultant that could be filing a thousand cost reports. They're continually having to go to websites to see if anything changed.



So, about 3 years ago, we decided that it was time for us to change and create a system to where a provider could go to one spot and electronically file their cost report. But we had one issue. And that was the wet signature. And so, until we could overcome that burden, a cost report would never be able to be filed 100 percent electronically. And as most of you know, in the previous year—I guess it was in August when the final rule came out—the wet signature is no longer required for cost reports beginning on or after 12/31/17. So, this is the first time that we can go live with this.

So like I said, we've been working on it for 3 years, and we think we have a great product. We believe it's very easy. And we really believe providers are going to enjoy that – this efficient, quick service in uploading your cost report.

And so I'm going to turn it over to Patrick, who design – who worked on the design team for this – for MCR eF.

Patrick Herrity: Thank you so much, Linda. My name is Patrick Herrity. I'm a senior consultant with CGI Federal. Welcome to the Medicare Cost Report e-Filing system webinar.

Please proceed to the next slide. Essentially, this slide is just a list of acronyms for your reference for later. We won't go over the – each of these acronyms, but you can use these for your reference when accessing the slide deck at a later time.


Please go to the next slide. All right, so as Linda was saying, we're really excited to introduce a new CMS system, the Medicare Cost Report e-Filing system, also known as MCR eF. We'll also be communicating a rollout plan to provide additional resources and information to the providers and all other Medicare stakeholders regarding the system.

Please proceed to the next slide. On tap for today's agenda, we've already done introductions. We'll provide a little bit of business background and overview so that we know what part of Medicare we're talking about that MCR eF deals with. We'll provide a high-level overview, a walkthrough and detailed overview of MCR eF, the system itself. As I said on the prior slide, we'll discuss a rollout plan to provide additional information. And we'll finish today's meeting with a question-and-answer session.

Background and Overview

Next slide, please. Slide number 5, please. Next, we want to provide a high-level business overview. We know there is a large number of participants on the line with a variety of different backgrounds and expertise. So, we want to make sure we're all on the same page, and what we're talking about is where MCR eF is involved with. And that's the Medicare Cost Report.

So as Linda was saying earlier, the Medicare Cost Report is used to determine Part A providers' annual Medicare reimbursable cost. Provider – providers use a large number of sources to create their cost report, including CMS's existing system, the Provider Statistical and Reimbursement system. As Linda was saying, there are approximately 50,000 cost reports submitted each year, which account for over \$200 billion worth of Medicare reimbursement.



Providers themselves have a regulation-driven deadline for submitting an acceptable cost report to their Medicare Administrative Contractor. And then, MACs have a policy-guided requirement for receiving, accepting, reviewing, auditing, and finalizing cost reports.

Please go to slide 6. To talk more about the current cost report submission process from a provider's perspective and the receipt from the MAC's perspective, for the provider to make a submission, they have to create a cost report package, which can include some or all of the following files: an electronic media computer-readable version of the cost report, which is a custom text file; a human-readable version of the cost report, which is typically in PDF format; interns and residents data, also known as IRIS; and then any other required supporting materials that they have to submit, such as a working trial balance, a bad debt listing, etc. Lastly, they'll print the Worksheet S and provide a signature in ink by an officer of the provider.

They'll bundle that whole package together, and they'll mail it or hand-deliver it to their MAC. And the majority of cost reports are sent in that way with a few being transmitted via portal websites available by some MACs. Once the cost report is received by the MAC, the MAC has 30 days from receipt to perform their acceptability review to make a determination on that cost report.

Please go to slide 7. So to improve on the current process, CMS set out the following goal: to standardize, automate, and streamline the cost report processes for provider submission and MAC receipt, acceptance, and the subsequent handling there – afterwards.

Please proceed to slide 8. Critical to achieve this goal, CMS established the MCRéF system, which is a new application which allows Part A providers to electronically transmit their cost report package, essentially electronic filing. The system will be available as of today at 4 pm Eastern Time. Usage is entirely optional. It's not required. You can still mail or hand-deliver your cost report to your MAC as you may do today. The system will be accessible to EIDM PS&R security officials and backup security officials and also Medicare – or MCRéF authorized cost report filers. And we'll get to that in a moment. Once you've submitted your cost report via MCRéF, it will immediately be accessible to your MAC to download all of the materials that you've filed.

Please proceed to slide 9. There are several advantages to MCRéF. So here's a few that we'll go over. Once you see the page that we're about to go over in a moment, it's very easy to use.

It provides one process for all Part A providers via one official submission portal. Again, it'll be available to all Part A providers. It'll be particularly beneficial to large chain organizations which have providers that are serviced by multiple or all MACs and also any providers that may change MACs due to a change in ownership or for some other reason. Ultimately, having this one process via one submission portal, we think it'll reduce confusion, delays, and time you spend on administrative processes.

The other thing that MCRéF provides is immediate response on – regarding the receivability of your cost report submission. So sometimes you'll mail in your submission and it'll take several days for it to get to your MAC. And then they'll make a determination or they'll determine if it's received or not. MCRéF—the moment you click the Submit button, it will tell you whether your cost report was received or not.



New MCR Submission Process

Please go to slide 10. The next slide will get into more details. And then from there, we'll actually go through some screenshots of the – how the system works, how you'll log in and access the site, and then particulars about the details of each field.

Please go to slide 11. So as I was saying earlier, the new system, MCR_{EF}, will be available this afternoon at 4 pm Eastern Time, and it'll be accessible via the URL listed on the slide, <https://mcref.cms.gov>. It's not available right now but will be available at 4 pm Eastern Time.

As I stated prior, the access is controlled by CMS's Enterprise Identity Management system and right now is restricted to EIDM PS&R security officials, backup security officials, and MCR_{EF} authorized cost report filers. Anyone that has the existing PS&R SO or BSO role will, by default, have access to MCR_{EF}. So, you won't have to do anything to change your role. You'll just be able to access the URL, and you'll be able to log in. Any organization that doesn't have access to PS&R will have to enroll a PS&R SO within EIDM to access MCR_{EF}.

One thing that's particularly important if you do want to use MCR_{EF} is it'll be very important to keep your EIDM SO and BSO accounts in good standing. This includes updating your password per CMS's policies and procedures as they relate to password updates and the timely replacement of your security official due to turnover or changes in staff. Any issues with your EIDM account, your credentials, or being able to log in will not be a valid reason for filing your cost report late, because you can always basically drop your cost report in the mail as you do today if, for some reason, you're having EIDM issues.

One thing we have mentioned here on this slide but has since changed is CMS is working with EIDM to create a dedicated MCR_{EF} role that the EIDM Security Official of your organization or Backup Security Official could delegate out to a particular person that they want for cost report filing. That is actually available as of yesterday for people to request. And the SO or BSO will be able to approve that role. And it's called the MCR_{EF} authorized cost report filer role.

Please proceed to slide 12. So now we'll go through a few slides that actually involve accessing and logging in to the system and using the system. The first one is when you go to mcref.cms.gov—and again, it's not available right now but it will as of 4 pm—you'll basically get the EIDM Terms and Conditions page. Here, you'll click I Accept at the bottom of the screen.

Please proceed to slide 13. From there, you'll see the EIDM User ID screen. Here, you'll enter your SO, BSO, or your MCR_{EF} exclusive role user ID and click Next.

Please go to slide 14. Then you'll reach EIDM's Password page. So then you would basically enter in your password corresponding to your EIDM user ID that you entered on the prior screen, and you'd click Log In.

Please proceed to slide 15. And then, you'll be into MCR_{EF}, and you'll be logged in to the system. Like I said, this is the entire system. It's one simple, easy-to-use screen. I'll go over each of the fields in a moment in great detail. But for now, I just want to go over the business process, or the workflow, that you'll encounter if you want to use MCR_{EF}.



So first, as highlighted here in the presentation, you'll select your provider CCN from the Provider dropdown. Or – and then, after you've selected your provider, you'll select their fiscal year end that you'd like to e-file for.

Please proceed to slide 16. From there, you'll select the Medicare utilization level of the cost report that you're filing, and you'll confirm your First Cost Report Submission status. So the system is aware if you've had a submission logged as of the time that you logged in. And so there, you'll confirm if that's correct, and then you'll proceed.

Please proceed to slide 17. And then, you'll upload all of your cost report materials. Some materials are required based on the type of provider you are or the Medicare utilization you have selected. And that's indicated based on a little asterisk – red asterisk to the left of the field. So you'll see in the example that we're showing on the screen the ECR, print image, and signed certification page are required. In this actual example, the provider has actually uploaded the ECR, print image, signed certification page, and other, which has all of their other supporting documentation.


To upload anything for a particular row, all you have to do is click the Browse button to the right, corresponding to that row, you navigate to the location either on your network drive or your work computer for that file, you select it, and then you'll see the path – once you click to open or select that file, you'll see the path in the File Upload column for that row. The system expects that you only upload one file per row. If you have multiple files that you submit as part of your supporting documentation, that would all go into a ZIP file or another archive file type in the Other row – in the Other slot.

One thing that – to note that's on the screen is you should never encrypt or password protect any of the files, either the main file that you submit or files within ZIP files. The system is a secure portal for transmission of your cost report materials, including safe submission, or safe transmit, of your PII and PHI. So, no need to password protect or encrypt your files.

Once you've uploaded all of your materials that you would submit typically through the mail via the system, you need to read the acknowledgment statement at the bottom of the screen acknowledging that this is your official submission to CMS and your MAC. By checking that box, you are acknowledging that, and the Submit button will become activated. So if you notice, right now, the box is not checked. The Submit button is disabled. Once you select it, the Submit button will be enabled. At that time, when you click Submit, the system will perform specific validations just to make sure that it is a sound submission.

And so would you please go to slide 18? This screenshot is an example of what an error would look like. So in this case, the provider has selected the checkbox of the acknowledgment statement, has clicked the Submit button, but something is actually wrong with the submission that they've made. In this case, the Error Messages section pops up at the – on the screen. One moment. All right, sorry about that. So in this case, the Error Messages section pops up on the screen and essentially gives you an error code that you can discuss or basically you can have for your reference so you can talk to your MAC about the issue or for some reason you talk to CMS.

But in this case, the issue here is that the Provider FYB or FYE specified in the cost report does not match the value selected on the screen. And in particular, we point out to you that the fiscal year end that's selected in the – or that's in the cost report does not match the one that's selected on the screen. So in this case, the



system looks in the ECR file, determined that the fiscal year ended 12/26/2017 in the file, but the submission that's made on the screen is for 12/31/2017. And so, essentially, the provider would have to resolve this issue to successfully submit their cost report to MCR eF. Once they've resolved the issue and uploaded the correct file to the ECR slot, once they submit again, if no other errors are triggered or warnings, they will be presented with a Success Message.

Please go to slide 19. And in slide 19, we show the Success Message at the top of the screen. It informs you that for the provider and fiscal year end that you filed for, your cost report's been electronically postmarked with CMS as of the date and time in Eastern Time that you made the submission. The system will also give you a unique e-filing ID for your reference if you need to talk or discuss this cost report or for your records in general.

Please proceed to the next slide, 20. Okay, as I mentioned before, the prior six or so slides essentially just went over the workflow and how you'll submit a cost report. Now we'll actually dive into the details of what was actually in each of those dropdowns.

So first, we talked about selecting the Provider number. In this case, the Provider number contains all of the CMS Certification Numbers that are registered in EIDM which the provider also has entered into CMS's System for Tracking Audit and Reimbursement. This system is also known as STAR, and it's a MAC-maintained system. But essentially, it has to be in STAR and also registered in EIDM for your organization.


The Fiscal Year End dropdown is the next thing that we selected to e-file our cost report. And the Fiscal Year End dropdown contains all the fiscal year ends for the selected provider which have occurred in the past 6 years that are on or after 12/31/2017 as recorded by your MAC in STAR.

Next, we selected the Medicare Utilization. And that essentially is just selecting your Medicare utilization level of the cost report that you're e-filing. The options available in that dropdown are Full, Low, and No.

What I mentioned on one of the prior slides is next you confirm the First Cost Report Submission indicator. And essentially, this tells you if the cost report has already been recorded in STAR as received by your MAC for the provider and fiscal year end that you have selected on the screen. So it'll be Yes if this is your first cost report submission and we have an indicator that there aren't any records in STAR. It'll be No if there has been something received in STAR.

Next is the Cost Report Materials table. That's where you upload all of your files. Essentially, this is where you would upload all of the cost report materials needed to submit a complete cost report package. Just like you would mail everything in, everything needs to go in its dedicated slot or in the Other slot for supporting documentation.

One thing to note at the bottom of the screen – or the bottom of the slide 20 is that, for Provider and Fiscal Year End, if you don't see a value in the dropdown that you're expecting, you should confirm a few things first. First, you should verify with the SO of your organization that the – that if you're looking for a specific provider, that it is registered – its CCN is registered in EIDM for that organization. The next thing you need to confirm is that you are a user set up in that organization with an e-filing role. And again, that's a security official, a backup



security official, or the new MCR eF authorized cost report filer role. Once you've confirmed all of those things, if you still have issues seeing a value in one of those dropdowns, you should contact your MAC.

Please go to slide 21. Next, we'll discuss all of the cost report materials. Those were the rows where you were uploading – or where the provider will upload all of the particular files that they need to submit as part of their cost report package.

First is the ECR, which is the Electronic Cost Report file. Based on your provider type, it's our understanding that this file is also known as the EC file for hospitals, the SN file for SNFs, and so on. The ECR file is required for all providers filing a full Medicare utilization cost report except Home Offices and Limited Purpose Insurance Companies. The format expected is a single generate – a single file generated using a current version of CMS-certified ECR vendor software that is not a PDF, a ZIP file, or another archive file type. It should be that custom text file that you generate in your cost report vendor software. You cannot upload a file over 1 MB.

Next is the Print Images – the Print Image, which is the human-readable copy of the cost report. And for Home Offices, this is where you would upload the 287-05 cost statement. The Print Image is required for all providers filing a full or low Medicare utilization cost report except for LPICs. It's also required if you provide an ECR file because those should come hand in hand. The format expected by the system is any human-readable format that is not a ZIP file or other archive file type. And the file limit for the Print Image is 10 MB.

Next is the Signed Certification Page slot. This is the electronically signed Worksheet S certification page. We'll discuss more about e-signature in a moment. But that's the expectation for this slot. For the Home Offices, this is the 287-05 Schedule A. So this particular row is required for all providers except LPICs. The format expected is any human-readable format that is not a ZIP file or other archive file type. And the size limit for this is 10 MB.

Please move to slide 22. To continue along the cost report materials, next is IRIS. This is the Intern and Resident Information System files required for teaching hospitals claiming GME or IME full-time equivalents on their cost report. Currently, this is not required by the system but may – but CMS may decide to do so in the future. The format expected is an unencrypted ZIP file containing a single set of master and assignment DBF files. That's the M and A files. The file limit is 1 MB.

Next is the Other. This is the particular row where I talked about all of your other supporting documentation that doesn't already have a dedicated row would either be zipped up or included in that particular row. And that includes things like the working trial balance and the bad debt listing as I mentioned previously. This particular row is required for all LPIC provider cost reports. And the format expected is – this row, essentially, can support any file type, including the support of multiple files within a single unencrypted ZIP or other archive file type. So as I was describing, any other materials you want to submit that you normally submit in the mail to your MAC but that don't already have a dedicated slot, this is where that would go in a ZIP file. The file limit for this slot is 300 MB.

Next is the Cover Letter. Essentially, this is a document for describing the nature of your submission or if there's anything particular that you want to address up front to your MAC about the submission you're making. This is required for all revised cost report submissions. And we'll talk about original vs. revised or your first cost report submission vs. a revised cost report submission in a moment. The expectation of the format for this



particular row is any human-readable format that is not a ZIP file or other archive file type. And the file size limit for this is also 10 MB.

Please go to slide 23. All right, so we covered all the details on the screen. Next, we'll kind of go into a little bit more details about the workflow again.

So we have shown examples of an error and a success scenario in the screenshots that we showed a few slides ago. This slide essentially covers that the system will perform specific receivability validations to confirm that your cost report submission is fundamentally sound.

So, there'll be certain checks that happen. And if the cost report submission fails any of those checks, the error will be communicated to you on the screen as we saw in the previous screenshots. If an error is displayed, that cost report will not have been received by your MAC. So, you'll have to resolve that issue to then resubmit successfully to get a received cost report to your MAC. These are not considered rejections and will not follow CMS's formal cost report rejection process.

If a submission – as we saw on the success scenario on previous slides, if your submission passes all the receivability validations, you'll get a message that your cost report was received and will give you an – or the system will give you an electronic postmark date in Eastern Time and a unique e-filing ID for your reference.


Please go to slide 24. All right, so as for those checks that the system is doing, we're actually going to go through each of those. Some of them we described when we talked about the cost report materials and what's allowed from a file size perspective and what format the system expects.

In this case, all required cost report material files must be included that are required. And they must be in a valid format and within the size limits that we talked about on prior slides. The attached files must also conform to system technical restrictions such as they must – any file that you upload cannot contain a virus or malware, must have a valid file name, and cannot be blank.

Next, I talked a little bit about your first cost report submission vs. your revised. For any provider and fiscal year end as you go to submit your cost report, any fiscal year end will – can always have its first cost report submission. Anything subsequent to that after you've done a successful first cost report submission is considered a revised submission in the system. And a revised submission can be submitted prior to acceptance or can be submitted as an amended cost report submission after as-filed acceptance.

The one thing to note is that this particular thing is talking about you can only submit one revised cost report per day. If, for some reason, you go to submit your revised cost report submission and you realized you've missed a file, you can – if you need to submit another cost report on that day, you can formally send an email or basically a letter to your MAC to ask them to reject that cost report submission so that you can actually do another revision on that same day.

The next one essentially deals with you cannot file a cost report as – basically, the fiscal year end has to be within the last 6 years and must be on or after 12/31/2017. And this actually isn't a particular error. This is actually dictated by the options that are available in the Fiscal Year End dropdown. So, if you need to file



anything that is older than 6 years or that is prior to 12/31/2017, you'll have to do so via the mail. MCRéF only has that one limitation as to what you can submit.

The one example we talked about where we showed an error is that the provider, fiscal year begin, and fiscal year end in the ECR file must match – must exist in STAR, the system that the MACs maintain, and must match the ECR file and what's submitted on screen.

Next, the provider cannot be locked in STAR. An example of being locked is if the provider is administratively closed. The provider for that fiscal year end cannot be a subunit. Any subunit should be submitted under their parent's cost report. And for that fiscal year end, there cannot already be a finalized NPR present for the year.

Lastly, the last receivability check is that, for a full Medicare utilization cost report, the system will check that the subunits and consolidated FQHC/RHC units in the ECR file match exactly what is documented in STAR by your MAC.

Please go to slide 25. All right, the next slide covers some additional details or miscellaneous details about MCRéF. There are also warnings. We spent some time talking about the Success Message and the error messages. But there are also a few warning messages. When you encounter a warning, you'll click Submit. A popup screen will display, and will – the system will describe what the warning is, and you'll be able to acknowledge the warning, and they'll allow it and then proceed with your submission or you'll be able to cancel and actually consider whether you need to resolve that warning to ensure that once your cost report is received, your MAC will also accept it.

So examples of the warning is if you – if you're filing your cost report after your due date, you'll get a warning saying that you're filing your cost report after your due date. You'll also get one if you attempt to upload an ECR file that was not generated using the most updated software available from your cost report vendor.


Next, to submit your cost report timely, you'll need to make sure you do so by 11:59 pm Eastern Time on the date of your due date. So again, everything's in Eastern Time. So, to be timely, you'll need to submit by 11:59 pm Eastern Time on your due date.

As I mentioned when we looked at the Cost Report Materials table, you should never encrypt or password protect any of your files. The system itself is a secure portal, in particular for transmitting your PII and PHI. So, do not encrypt or password protect your files.

Duplicate submissions will be rejected by your MAC regardless of how that duplicate submission is submitted. So, if you submit a duplicate submission, the first one received, it will be the one that your MAC actually uses as your cost report submission. The second one will be rejected the moment the MAC notices that it's a duplicate.

Along those lines, the first cost report received by your MAC, whether it's via MCRéF or mail hand delivery, will be treated as your first cost report submission for the year.

So we have an example here on the slide that sort of outlines exactly why this is important. In this scenario, a provider files their cost report in the mail prior to their due date. But then, they decide to use MCRéF to file a



cost report submission after their due date with the first submission having not been received by their MAC that came in – that they sent in through the mail. In this case, because you're filing late, as I mentioned earlier, you'll get a warning from the system saying "Are you sure you want to submit this, because you're filing late?" In that case, if you know you have something in the mail, you have to consider whether you actually want to make that submission, because the thing that's received first by your MAC will be the – your first cost report submission for that year and, at that point, you will be deemed late. So that is the importance of that.

Please go to slide 26. Okay, so next, we'll talk about the usage of MCR eF. Up until 7/1 of this year—so 7/1 of 2018—all current methods of cost report submission are available with MCR eF being an additional option as of today at 4 pm Eastern Time.

Effective on 7/2, July 2nd of this year, there will only be two CMS-approved methods of cost report submission going forward. That's electronic submission via MCR eF—this is the one we are talking about today—or physical submission via mail or hand delivery, as many do today.


One thing we talked about earlier is that MCR eF handles the majority of all – can handle the majority of all submissions, but there may be cases where you won't be able to submit your cost report. Even though it is acceptable, you may – it may not be receivable in MCR eF. And an example that we have here is if you always submit over 300 MB of supporting documentation, the system will only allow you to upload a ZIP file that's 300 MB or less. So, if you always have to submit a gig or more, you'll still have to mail that in because the system does not currently support anything over 300 MB. But in general, that should be acceptable as long as it passes all the other checks but just the system would not be able to receive that.

And then the last bullet here essentially deals with if for some reason the system is down for maintenance or, for whatever reason, you are not able to use the system to file based on login reasons or whatever the reason may be, you will not be given an extension for system issues preventing you from e-filing. Essentially, you can always fall back on mailing your cost report. And so, there really is no excuse for being late due to the system itself.

Please go to slide 27. So that covers the majority of the details of the system. But next we wanted to cover electronic signature with – which Linda discussed a little bit earlier in the intro.

So in general, last August, CMS issued the 2018 IPPS final rule, which authorized providers to file an – with an electronic signature of their Worksheet S effective for fiscal year end on or after 12/31/2017. This final rule did not change who is allowed to sign on the signature line of the Worksheet S but just dictates that electronic signature is allowed based on when it – when that was effective. And so, CMS has been working to release all of the transmittals for all of the current cost report versions to support e-signature.

If you want to use MCR eF but you file on a version which doesn't yet support e-signature, then you must do both of the following. You need to upload a scanned copy of the Worksheet S certification page to the Signed Certification Page slot when you make your submission in MCR eF. And then, you need to mail and hand-deliver a hard copy with a signature signed in ink to your MAC. And that must be received by your MAC within 10 days of that MCR eF submission.



And so please go to slide 28. We'll actually talk about which versions currently allow for e-signature and which do not. The majority of the versions currently support e-signature. So you can see for hospitals, SNFs, ESRDs, FQHCs, HHAs, OPOs and histo-labs, and hospices, all of their versions currently support e-signature. So, all you need to do in that case is electronically sign and check the box on the Worksheet S, and then you upload that file to the Signed Certification Page row when you do your MCRéF submission.

For RHCs, CMHCs, and Home Offices, you'll need to follow the process that I described in the prior screen where you provide a scanned copy and a signed certification page when you make your submission in MCRéF. But then, you also need to mail in a hard copy with that wet signature or with that signature from an officer of your organization.

Please go to slide 29. The next few – few slides essentially cover valid and invalid uses of e-signature. This is not an exhaustive list of what's possible for valid e-signature or invalid e-signature. For specifics, you should definitely reference the 2018 IPPS final rule for guidance on electronic signature. But we wanted to go over a few examples of what is valid and what is invalid.

So the next – this slide goes over a valid use of e-signature. In this case, what CMS has done is, on the Worksheet S page, they've added a checkbox which essentially says that your electronic – you're agreeing that your electronic signature is your legally binding equivalent of your original signature. So, to use electronic signature, you have to check that box. And then in this case, the provider has chosen to type their first and last name for the officer or the officer has elected to type their first and last name into the signature line. This is an acceptable form of electronic signature.

Please go to slide 31. This is also an acceptable form of electronic signature. In this case, the officer of the provider that signs the Worksheet S has printed the Worksheet S. They have hand checked the box saying that their electronic signature is their legally binding equivalent of their original signature, and they've hand signed the signature line. They then scan that document to make it an electronic file. And then they could use that to upload to the Signed Certification Page row when they did their MCRéF submission. So this is also an acceptable use of e-signature.

The next two will go over invalid. In this case, I talked about the importance of this new checkbox that CMS added. The checkbox has to be checked for it to be considered a valid use of e-signature. Sorry. So, in this case, since the checkbox is not checked, this is considered an invalid use of electronic signature and would be rejected by your MAC.

Please go to slide 33. This is also an invalid use of e-signature. In this case, the officer of the provider has checked the box appropriately electing for e-signature. But in this case, they haven't provided a first and last name. They've just provided X123, which is not a valid first and last name or signature. So, this would be an invalid use of e-signature.



MCREf Provider Testing

Please go to slide 34. Next we'll talk about specific acceptance testing that happened for the MCREf system.

Please go to slide 35. In this case, CMS had reached out to six provider organizations, which represented approximately 150 Part A providers, to have them volunteer to test this system and to get their feedback. At the end of the testing, CMS asked them – asked the participants, on a scale of 1 to 10, how likely they were to use the MCREf system. The average rating received was a 9.7 out of 10.

And you see some of the quotes here of the feedback that was received. “Very easy to use and understand.” “The system was quick to show errors and intended results.” The one provider who did testing had an excellent experience and was really excited for the system to go live.

Rollout Plan

Please go to slide 36. At the beginning, we talked about that rollout plan to provide additional information to the provider community and other Medicare stakeholders.

We'll talk about that here on slide 37. Essentially, CMS issued Change Request 10611. This was issued Monday, 4/30. And so there's information. A lot of the information that's provided in the slide deck today is in the CR and even more. There's also a quick guide that's in there – or not a quick guide but it's a – it's an attachment that serves as a quick guide which will take you through the screens that we went through in the presentation today.

On – an ongoing effort is to provide additional outreach and education. So today we have the webinar to discuss the system and introduce it to everyone. There'll be a CMS website posting coming soon, which will have a lot of additional information, FAQs, the user manual, some other documentation that'll be valuable to you.


CMS will be up – also updating a lot of their documentation such as the Medicare Financial Management Manual, the 100-06, the Provider Reimbursement Manual 15-1 and 15-2. And then as I said before, a lot of the cost report version's transmittal forms are being updated to support e-signature and other things.

Lastly, this – all of this is expected to completely – complete the rollout by early June.

Please go to slide 38. That concludes the content portion. Thanks so much, everyone. We'll now move into the question-and-answer session.

Question & Answer Session

Diane Maupai: Thank you, Patrick. Our experts are now ready to take your questions. Throughout the question-and-answer session, we will ask webcast participants to provide feedback about their experience with the technology we're using today.



Remember to disable your popup blockers for the best results. We'll begin by answering a few questions that were received from the webcast, and we'll then take questions from the phone.

Operator, please prompt the telephone users, and begin to compile the Q&A roster.

Operator: To ask a question, please star followed by the number 1 on your touchtone phone. To remove yourself from the queue, press the pound key. Remember to pick up your handset before asking your question to assure clarity. Once your line is open, state your name and organization. Please note your line will remain open during the time you are asking your question, so anything you say or any background noise will be heard in the conference. If you have more than one question, press star 1 to get back into the queue, and we will address additional questions as time permits.

Please hold while we compile the Q&A roster.

Diane Maupai: All right, here's our first question from the webcast. Our hospital has an A extension on its CCN number. Will this cause an issue when submitted – when the cost report is submitted through this process? We currently cannot use Novitasphere submission.

Geoff Kuhn: This is Geoff Kuhn with CGI Federal. For this one, we can't really answer this question specifically. We'd recommend that you talk to your MAC. We're not aware of any provider using the suffix provider numbers for actually filing cost reports. And so, for anyone in that scenario, I'd definitely recommend that you talk to your MAC.

Diane Maupai: Thank you, Geoff. Our next question is is the MAC the same as the fiscal intermediary?

Linda Uzzle: Hi. This is Linda Uzzle. Fiscal intermediary was used probably more prior to 2007/2008. And based on the type of contract CMS has with the agencies for providing the Medicare Part A services, they're now under FAR contracting, and they're now called Medicare Administrative Contractors. And so, it's where you submit your cost report, and it's where claims are submitted. And so some people still call it fiscal intermediary, but the current name is a MAC.


Diane Maupai: Thank you, Linda. Our next question is can an MCR eF authorized user be an existent – existing PS&R user—a user, not a security official?

Geoff Kuhn: This is Geoff Kuhn with CGI again. The MCR eF authorized cost report filer is combinable with other PS&R user roles or allowed to be stand-alone. Therefore, anyone who's not a security official can have this access delegated to them by a security official at an organization.

Diane Maupai: Thank you, Geoff. Operator, let's take a question from the phone now.

Operator: Your first question comes from the line of Edward Coyle.

Edward Coyle: Hi. Yes, on slide 18, you showed the example of the error where the fiscal year end date, 12/26, did not match the 12/31 date. And then you mentioned about, like the – you know, it's got to be loaded with 6 years' worth of, I guess, prior submissions for the fiscal year. What about a hospital that has a stub



period when there's a sale or when there's a closure and the hospital's fiscal year doesn't end on their typical 6/30 or 12/31 or 9/30 fiscal year end date?

Geoff Kuhn: This is Geoff with CGI. For the submission to go through, you and the MAC need to be on the same page as to what year it is that you're submitting. So, if you've got a CHOW, a change of ownership, that's resulting in a shortened cost report period, as long as the MAC is aware of that and has the documentation to support that, then MCR eF will reflect the shortened year in the dropdown.

If that change has occurred and the MAC doesn't know about it yet, that's one of those common scenarios where you might not see the year you want in your dropdown and you need to call your MAC to sort of explain and confirm. And once they have that information and they make the update on their end, you'll then see in the dropdown the year that you're trying to submit.

Edward Coyle: Okay, thanks.

Diane Maupai: Thank you. We'll take one more question from the phone.

Operator: Your next question comes from the line of Jason Lang.

Jason Lang: Hello. This is Jason. I'm calling with the Prairie Eye Center. We're a multispecialty specialist office, and the webinar is mentioning SNFs and Part A. This obviously isn't dealing with the specialist or Part B providers. Is that correct at this time?

Linda Uzzle: Hi. This is Linda.

Jason Lang: Hello.

Linda Uzzle: Hi. This is ...

Diane Maupai: Sorry about that.

Linda Uzzle: Hi. This is Linda Uzzle. That is correct. It sounds like you're talking about a physician practice.

Jason Lang: Yes, physician practice.

Linda Uzzle: And this is dealing with providers—hospitals, skilled nursing facilities—institutional providers ...

Jason Lang: Okay.

Linda Uzzle: ... that file a Medicare Cost Report.

Jason Lang: Okay, so are we expected that we on the specialist side – provider side will have to do anything with cost this year?

Diane Maupai: Give us one minute, please.



Jason Lang: Sure.

Linda Uzzle: Yes, hi. This is Linda Uzzle again. Right, this does not deal with Part B providers. This is only Part A institutional providers.

Diane Maupai: Thank you, Linda. We'll now take another question – a few questions from the webcast. If a provider does not currently have a security official, how long will it take to set up a security official?

Geoff Kuhn: This is Geoff with CGI. The general process for establishing or registering a provider within EIDM to establish a security official is the same one that's been in use for providers all along. I believe there's approximately a 2-week period for – once you put in a request and send in your paperwork, for that paperwork being approved and being able to get your account set up. So generally, about 2 weeks from start to finish.

Diane Maupai: Thank you, Geoff. Another question. Can you file amended cost reports through MCR eF?

Geoff Kuhn: This is Geoff with CGI again. The – when we discussed on the screen whether or not this is your first cost report submission or not, you are absolutely allowing the submission of amended cost report submissions. It's also feasible that after you've submitted your first submission, even before that's been accepted or not, you can still submit a revision at that point for that to be available to the MAC. So, you can submit up to one revision per day. If there's already an acceptance, then that thing would be treated as an attempt to amend.

Diane Maupai: Thank you, Geoff. Here's the next question. It was said that, if it's more than one file, you should zip and put it in the Other category, I guess. But with IRIS, there are two files, the M and A files. Do we zip both and put it into IRIS?

Geoff Kuhn: This is Geoff. And that's correct. The IRIS file is a – is the dedicated slot. So, it doesn't go in the Other ZIP. But the two IRIS M and A files do get zipped together and placed in the IRIS slot.


Diane Maupai: Thank you, Geoff. One more and then we'll go to the phone. Let's see. Normally, we zip up all of our files into one ZIP file and then upload it to Connex. Are we now required to upload individual files?

Geoff Kuhn: This is Geoff. For the specific slots that are dedicated—the ECR slot, the Print Image slot, the Cover Letter slot—the expectation is that you will put the specific files in each of those slots. As an example, with the ECR file, or the Electronic Cost Report file, itself, if you do not fill that slot, most of the time if you're filing a full cost report, the submission will not go through.

The other slot is for all your other things to go in. Those aren't uploaded individually. That's everything else that you have that isn't dedicated. But, for those that are specifically called out on screen, you do need to upload the specific files for each of those slots, if applicable to your submission.

Diane Maupai: Thank you, Geoff. Now we'll take a question from the phone.

Operator: Your next question comes from the line of David Sierra.



David Sierra: Yes, good afternoon. I'm a security official for Memorial Healthcare System located in Hollywood, Florida. I've got a two-part question. The first one is, as security official, when I sign in, will this – will MCR_{EF} be immediately available after 4 pm today? That's what it sounds like to me.

Then, the second part is I – the way the electronic signoff was described, it makes it sound – it almost sounds like it assumes that the person doing the electronic signing is the signatory, which is, of course, not always the case. It's usually the CFO who's the signatory but a different person would be signed in to the portal. So how is that going to work? Can – is a link going to be – can a link be sent to the CFO to – for he or she to click from their workstation or from their desk and then it transmits as an electronic signature? Or if you could provide more detail on that, I'd appreciate it.

Diane Maupai: Okay, give us one minute, and we'll be right back.

Okay, good.

Geoff Kuhn: This is Geoff. For the first part of your question, as a security official, you will – you inherit access to MCR_{EF} alongside your access to PS&R. So, when MCR_{EF} goes live this afternoon at 4 pm, you should have access for all the organizations you're registered for in EIDM.

For the second half of your question related to the person filling out the cost report vs. the person who's performing the e-signature, in general, the person doing the e-signature should be the signatory. So if – one way to do that is to produce a printout of the cover page to give to your signatory that they then sign in ink, scan, and give back to you. So, the person doing the filing will have that file from the signatory to include in the cost report filing. Other options may depend on your individual cost report vendor software as to what sort of workflow they have for the preparer to hand off to the signatory. But that would be internal to the vendor software and between you and your vendor.

Diane Maupai: Thanks, Geoff. We'll take one more question from the phone.

Operator: Your next question comes from the line of Mike Lefevre.


Michael Lefevre: Hi. My question has to do with, effective in July, MCR_{EF} will be the only approved method for MCR submission other than mail. So currently, what I've been doing is uploading it to NGSC_{onnex} and then we mail them a handwritten signature for the signature page. Would that still be a valid way of submitting a cost report?

Geoff Kuhn: This is Geoff. As of 7/2, that will no longer be an option for submitting your cost report.

Michael Lefevre: Okay, thank you.

Geoff Kuhn: As of 7/2, for electronic submission, MCR_{EF} is the only option. Mail and hand delivery remain options ongoing.

Diane Maupai: Thank you, Geoff. Now some questions from the webcast. Do the submitted files need a specific naming methodology?



Geoff Kuhn: This is Geoff. There is no requirement for a specific naming methodology for any of the files. I think many people follow some conventions that are helpful to the MACs. But there is no requirement.

Diane Maupai: Thank you. Does the submission to the MCR eF start the 30-day acceptance clock for the MAC?

Geoff Kuhn: This is Geoff. It depends on what time of day you're submitting. So on the MAC side, the cost report will become available to them pretty much immediately through MCR eF. But their 30-day clock will be based on whether or not you're submitting before or after 3 pm Eastern. If before 3 pm, that's considered same day. If it's after 3 pm, it's the next business day.

Diane Maupai: Okay, thank you. If you are filing for multiple PTANs in one cost report, for example, hospital, rehab, psych, would you select the hospital PTAN – would selecting the hospital PTAN be sufficient in the Provider field?

Geoff Kuhn: This is Geoff. For submitting cost reports, yes. You'd be picking what's often referred to as the primary or the parent provider on the cost report as the item in the dropdown for submitting your cost report.

Diane Maupai: Will providers get a formal acceptance or rejection notification in the system?


Geoff Kuhn: This is Geoff. Patrick went over in the presentation that when you do the submission, you will get immediate notification as to whether or not the cost report has been received. There will not be an acceptance or a rejection notification through the system. You will continue to receive those from your MACs through the existing processes they use today.

Diane Maupai: Thank you. Can we use the system to submit our Home Office cost report that's not as support documentation to one of our hospitals?

Geoff Kuhn: This is Geoff. For hospital – or for Home Offices, yes, the system will support the submission of the 287-05 Home Office cost statement. It's worth noting that right now, the Home Office cost statement does not have e-signature support, which we noted on one of the slides earlier. And so, if you're doing a Home Office cost statement through MCR eF, you will have to rely on the hybrid option of mailing in the wet signature page until the transmittals or updates come out that will support e-signature on the 287-05.

Diane Maupai: Thank you. Can consulting firms apply for a universal MCR eF user ID that can also be used for multiple clients with different ownership structures?

Geoff Kuhn: This is Geoff. The general way that EIDM functions is that every account has to be tied to an individual. So, if a consulting firm has an employee that they want to be working on different hospitals' cost reports, that individual can register an EIDM account. And then that individual can be authorized by the security official at each respective hospital organization for the authority to e-file on their behalf. So you can have one account per person. That account can be signed up under, you know, 1, 10, 100, there's generally no specific limit within EIDM as to how many you can be associated to. And then when you log in to MCR eF, the dropdown will reflect all of the providers you have been authorized under.



Diane Maupai: Thank you. If you have other files that exceed, I'm thinking, the megabyte limit, should a facility just mail in the documents like they have in the past, or should we still upload some items electronically and send— or send the ones that are too large via disk? Sorry about that.

Geoff Kuhn: Geoff again. For – the general rule for MCR eF is that whatever your cost report submission is, it needs to come in in full through the MCR eF interface for whatever documents are required as part of acceptability. The MACs are being directed not to accept partial things where you submit one half through MCR eF and the other half through the mail, with the exception of the hybrid for the wet signature requirement. So, if you exceed the limit for any of the individual slots, you should submit your entire submission through the mail or through hand delivery. You shouldn't be splitting it up across the methods.

Diane Maupai: Thank you. When the cost report is accepted, will the acceptance message be sent to the provider via email?

Geoff Kuhn: Geoff again. I think this overlaps a bit with one before. Whatever your existing process for receiving an acceptance notification from your MAC is will be the process going forward. MCR eF is not changing the way that acceptance or rejection is performed by the MAC in notifying you.

Diane Maupai: Thank you. Please confirm that passing receivability does not count against you with respect to the date the cost report has to be filed. Yes, we'll be right back.


Geoff Kuhn: Okay, this is Geoff. For receivability, receivability are the checks performed by MCR eF before allowing your cost report into the system. If you do not pass the receivability checks, your cost report is not received, and it is not postmarked. And so, at that point, the clock for you on cost report – the cost report due date is still ticking. If you pass the receivability checks, then you get the Success Message saying that this has been received and postmarked as of this time. And then that's what's going to be used to evaluate your timeliness.

Diane Maupai: Thank you very much. Please confirm that this software can be used to file the December 31st, 2017, cost report.

Geoff Kuhn: This is Geoff. The 12/31/2017s are the first year that supports the e-signature under the IPPS rule, and it's the first year that is allowed in MCR eF. So, 12/31/17 years and forward will be allowed to be filed through MCR eF.

Diane Maupai: Thank you. Please expand on the First Cost Report Submission. Is this used to confirm receipt? Or what is the purpose of this?

Geoff Kuhn: This is Geoff. For the First Cost Report Submission field, it's letting you know whether or not there's a record on the MAC's side already for the first cost report submission. It's just letting you know the current state. So, if you send something in through the mail and you're looking to do a revision through MCR eF, that will tell you whether or not that one that went through the mail has been recorded by the MAC yet, if they're aware of it yet. Or if you submitted one yesterday and you don't remember, it will tell you the first one has already gone in.



The important part of that field is making sure that – when you submit, that you agree with it. If it says that this is your first submission but you know you already submitted, you should call your MAC. If it says it's not your first submission and you don't recall ever officially submitting anything, you should also call your MAC. It's mostly a sanity check for you to be on the same page as your MAC because the first one that you submit as far as the MAC is concerned is going to be the one that your timeliness is based off of.

Diane Maupai: Thank you, Geoff. For low and no utilization cost report, requirements vary by MAC. How will this be handled?

Geoff Kuhn: This is Geoff. We worked with the MACs to identify what the common requirements are for low- and no-utilization submissions. So there's a standard set of things that are going to be required by MCRéF for a low or no to go through. If your MAC has an additional requirement for your specific provider or scenario for a cost report to be acceptable, that's going to be the thing that trumps when it comes to acceptability. But MCRéF's receivability as to whether or not it'll accept a submission from you – or sorry, will receive a submission from you is standard across all the MACs.

Diane Maupai: Thank you. Will the bad debt log go on the Other line, possibly zipped together with the supporting documentation in a ZIP file?

Geoff Kuhn: This is Geoff. That's correct. That would be a good example of the kind of thing to include in the Other file.

Diane Maupai: Okay, thank you. Will MACs allow third-party software vendors to submit cost reports directly to the MACs on behalf of providers, or is MCRéF the only way?


Geoff Kuhn: This is Geoff. As we went over it, the third-party software is not going to have any means as of right now for directly submitting. You can go through MCRéF, which is the Web Interface, and your third-party cost report preparers can get access to that through EIDM with your signoff. But they must use the MCRéF interface, or it needs to go through the mail or hand delivery. There is no current option for the softwares to do a direct submission.

Diane Maupai: Thank you. If duplicate submissions are rejected by the MAC, how does one submit a revision?

Geoff Kuhn: This is Geoff. Sort of like the amended, we just noted that you can do up to one revision per day. Once the MAC has removed your duplicate or otherwise cleared the way, then you can go into MCRéF and submit an additional revision, just like you would your original. The only thing that will stop you in MCRéF from submitting a revision is if you have already submitted one that same day and you haven't gotten it cleared out of the way by the MAC.

Diane Maupai: Okay, so thank you. If we have a payable to Medicare, is the check just mailed in to the MAC? Is the receipt of the check necessary by the due date, or can it be received after?

Linda Uzzle: Hi. This is Linda. With that question – with the first part, if a check – if there's an amount due payable to Medicare, when the cost report is submitted and there is an overpayment, that is a final



determination and the payment must be made. And for – hold on just a second. We're trying to get the question back up.

Diane Maupai: Hold on one second. Shall we take another question until we find that one? Or, actually, we're still looking. I believe it's this one. Oh no, it's not that one. It's the one after.

Linda Uzzle: Above.

Owen Osaghae: What's the number?

Linda Uzzle: What number – it's above ...

Diane Maupai: Sorry about that. We're looking for the rest of this question.

Linda Uzzle: Okay, we'll go on to another question. We'll get back to that.

Diane Maupai: Thank you. That's a good idea.

Diane Maupai: As a provider, if we become an authorized user, will we be able to pull – access PS&R system to pull for clients?

Geoff Kuhn: This is Geoff. The access to MCR_{EF} and the access to PS&R are independent things. As a security official, you inherit the rights to both aspects of the system. As anyone below that, you must be specifically delegated that access by the security official. So, the PS&R admin and PS&R user roles that exist within EIDM, those control your access to PS&R. The MCR_{EF} authorized cost report filer role will only grant you access to MCR_{EF}. So you can get both if the security official approves you for both. But they are independent things.


Diane Maupai: All right. Thank you. Slide 26 states that, as of July 2nd, there are only two CMS-approved methods of MCR submission, MCR_{EF} or mail/hand delivery. Does this mean we can no longer use – that we can no longer use the portal that our MAC has for uploading our cost report?

Geoff Kuhn: This is Geoff. That is correct. As of 7/2, the MACs have been directed that they're no longer allowed to accept cost reports through their portals. So, you should no longer be submitting your cost reports through their portals as of 7/2. Up through 7/1, those portals are still an acceptable way to submit your cost report, along with MCR_{EF}, starting today. But as of 7/2, for electronic submission, only MCR_{EF}.

Diane Maupai: Okay, thank you.

Owen Osaghae: This is the question.

Diane Maupai: Oh, okay, so here's the question that we started and then we lost it. Sorry about that. If the cost report results in overpayment to Medicare, do we mail the check to the MAC separately, or this means that the whole package has to be sent by mail?



Linda Uzzle: That wasn't the question.

Diane Maupai: Oh, it wasn't? Oh, sorry about that.

Diane Maupai: Sorry about that.

Linda Uzzle: It wasn't the question, but – this is Linda. It would be handled the same way as it is now. The check is sent separately because, typically, depending on your MAC and on the website, sometimes it goes to a different mailbox. And so I know on some MACs, the cost report is hand-delivered to one address – mailed to one address and the check is sent to a different address. So, that would depend on the MAC. But nothing changes with the way the overpayment is made. It would be dependent upon your MAC. And I would check their website.

Linda Uzzle: Yes, with MCRéF, it stays the same. They still have to submit the check as they have in the past.

Diane Maupai: Okay, thank you. Is it true that only three people are allowed to upload filings to MCRéF—the Security Official, the Backup Security Official, and the MCRéF official assigned by the Security Official?

Geoff Kuhn: This is Geoff. Those are the three roles that are allowed access to MCRéF, the Security Official, the Backup Security Official, and the MCRéF authorized cost report filer. But those are not restricted to only one individual. You can only have one security official at a given point in time. But you can have as many backup security officials and as many MCRéF authorized cost report filers as you wish to for any given organization.

Diane Maupai: Thank you. Just to confirm, an officer can print out the signature page with encryption code, then sign it and check the checkbox, then scan the signature back into MCRéF, and that is a valid form of e-signature?


Geoff Kuhn: This is Geoff. That is correct. That should line up with one of the examples in the presentation. It's printed, the box is checked, it is signed in ink, the entire thing is scanned, and that scanned copy is uploaded. That's a legitimate e-signature for MCRéF purposes.

Diane Maupai: Thank you. Can the provider give permission for a cost report preparer to sign their electronic name? We may need a minute.

Geoff Kuhn: Okay, all right. This is Geoff. Nothing about MCRéF is changing the criteria for who is allowed to sign a cost report. How you guys do that is an internal business decision that is up to you.

Diane Maupai: Thank you. Can we still use Connex for 2017 submission?

Geoff Kuhn: This is Geoff. I believe that Connex is the NGS system. So for your 12/31/2017 that's due by 5/31, you're definitely in that window where both systems are viable options. You could use MCRéF or you could use Connex.



As of 7/2, regardless of which cost reports you're filing, they need to be being done through MCRéF if you're doing them electronically. So, it's not necessarily with the year of the cost report. It's when you're doing the filing as to when the cutoff is applicable.

Diane Maupai: So if you file an amended cost report prior to 2017, you must use the old method of submission, correct?

Geoff Kuhn: This is Geoff. Yes, if you're filing an amended for a 6/30/2017, then that needs to be filed under your existing methodologies. That cannot use MCRéF.

Diane Maupai: Okay, thank you. We're now going to take a phone question.

Operator: Your next question comes from the line of Bill Ennis.

Bill Ennis: Actually, my question has been answered. I really appreciate it.

Diane Maupai: Thank you.

Operator: Your next question comes from the line of Tom Carlin.

Tom Carlin: Good afternoon. Tom Carlin from New Hanover Regional Medical Center. My question is is MCRéF prepared to handle high volume potentially on the day before a fiscal year end due date? And what kind of testing have you performed to see if MCRéF can handle some high volumes? And what happens if the system is down on the day before a fiscal year end due date? Thank you.

Geoff Kuhn: This is Geoff. I think when we were planning out this system, we were very aware of the likelihood for many providers to be filing on the last day the cost report is due. And, so, that's been a consideration from the ground up in terms of the architecture and the capacity.


We've done significant stress testing and – of the architecture and the application to make certain that it can handle the basically full volume of 12/31 providers if they all chose to file in the last 48 hours. Given that, though, we have done all that we can to make the system very stable under whatever load you guys throw at it.

But MCRéF itself not being available is not going to be a justification for a cost report extension or missing a deadline. So, if you don't need to wait till the last minute, I recommend not doing so. But if the system is not available for any reason within our control or otherwise as of the, you know, 11:00 on your due date, then you need to submit it otherwise.

Diane Maupai: Thank you, Geoff. We'll take one more phone question.

Operator: Your next question comes from the line of Greg Johnson.

Greg Johnson: Yes, I'm currently a PS&R user but I'm not a security official and I'm not a backup security official. Do I go through the EIDM system to request the security officer to make me an MCRéF filer?



Geoff Kuhn: This is Geoff. That's correct. The process for adding a PS&R role and the process for adding the MCRéF role are the same. You go to the EIDM portal, which is portal.cms.gov. And then, you log in to your EIDM account and do your normal profile modification there of "I wish to add an additional role." And the MCRéF approved cost report filer will be in that dropdown. When you make the request, it will go to your Security Official for approval. Once they approve it, you'll have access.

Greg Johnson: Okay, well, I'm actually there now. And when I go to "Add an additional role," I don't see the MCRéF as an option.

Geoff Kuhn: The – so for that, I basically would take a little work to troubleshoot your specific experience in the EIDM. But when you're looking at the existing application you have, over to the right, there should be an option for "Add roles," which is separate from – you're not adding a new application. You're adding a role to an application you already have. So when you go to add that role, you should see it in that dropdown when you selected "I work for a provider." And if that's not the case, then I'd have to direct you back to EUS, which is the support desk for EIDM, to troubleshoot your specific account issue.

Greg Johnson: Okay, thank you.

Diane Maupai: Please clarify—will PS&R users be allowed to use the MCRéF system or only PS&R security officers?

Geoff Kuhn: This is Geoff. The key is that security officials automatically have access to MCRéF. PS&R users can get access to MCRéF but only by going and requesting the additional role. Nothing about being a PS&R user will give you any privileges on the MCRéF side.

Diane Maupai: Thank you. How can we find out who our BSO and SO are?


Geoff Kuhn: Geoff again. If you're uncertain of who your Security Official is, the best thing for you to do is to call the EUS support help desk. I believe their information is referenced on the EIDM page that points you to the different help desks for the different applications. They should be able to look up and help you identify who your SO is. And if your SO, for example, is no longer with your organization, they also have processes in place to help you replace the SO. You need to have a functioning SO for your organization for PS&R and MCRéF to be optimally used.

Diane Maupai: You said this is available to all Part A providers. Our home health clients show Part B episodes only on the PS&R. Can those home health cost reports be e-filed as well? Give us a minute.

Geoff Kuhn: This is Geoff. So long as you're filing a standard home health cost report, even if it only contains Part B episodes, then, yes, you can still use MCRéF to file that.

Diane Maupai: What do we need to do about the signature pages for the 339 Questionnaire Exhibit 1?

Geoff Kuhn: This is Geoff. For the limited number of cost reports which still have a separate CMS Form 339, the CMS CR that came out yesterday provides directions saying that, for those, you can sign them and upload the scanned copy of the signed version of it into your Other slot. And then that should be sufficient for fulfilling



the requirements of having a signed Form 339. There's no requirement to mail in the wet copy of the 339 if you are uploading the signed scanned copy. And CMS CR 10611 has more information about that.

Diane Maupai: I'm moving on to the next question. If you type in the signature on Worksheet S, do you then print out that page and scan it and then upload?

Geoff Kuhn: This is Geoff. If you are print – if you're typing in the name on the electronic form, if you save that electronic form, that is sufficient. As long as the box is checked and the name is there with the first and the last name, there's no need for it to have been printed and then scanned again. Printing and scanning is only required if you're putting a wet signature onto it and then trying to get the wet signature into your electronic copy.

Diane Maupai: The IRIS files we submit have Social Security numbers. I'm not sure how this type of information can be submitted electronically. How do you suggest we handle the HIPAA confidentiality issues?

Geoff Kuhn: The – this is Geoff. The system itself has been configured to be a secure transport for personally identifiable information and personal health information. So, your IRIS files you should zip per normal, not encrypt or password protect, and upload. And the website is certified for that usage.

Diane Maupai: The fiscal year 2019 acute care IPPS proposed rule would require the submission of chain organization Home Office cost report with each hospital. We file over 100 hospital cost reports. Assuming this is finalized as proposed, would we have to submit this in the Other ZIP file for every filing?

Deanna Rhodes: Hi. This is Deanna. So I would suggest you submit that comment to the IPPS proposed rule. We do anticipate a lot of comments like that. We're not really changing the submission on the Home Office cost statement as far as if you have a chain going to the same MAC, one copy of the Home Office cost statement should substantiate that claim and we'll provide clarification. But please submit that to the IPPS rule for comment.

Diane Maupai: Thank you, Deanna. I understand that mailed cost reports remain acceptable. Is there going to come a time in the future when MCR eF is the only valid option?


Geoff Kuhn: This is Geoff. At this time, there's been no decision made about making MCR eF and electronic submission the only option.

Diane Maupai: Will the signature page still require encryption codes?

Geoff Kuhn: This is Geoff. I believe the transmittals themselves have been updated to reflect that the print image no longer has its own encryption code, which is generally where the signature page is in. The encryption code is still required for the ECR and I think still expected to be there as part of the signature page itself—the ECR's encryption code.

Deanna Rhodes: The signed certification page still has to have the encryption code.

Geoff Kuhn: For the ECR but not for the PI.



Deanna Rhodes: Oh, this is Deanna from Division of Cost Reporting, by the way. And the signed certification page, whether it's electronically signed or digitally signed, would still need to contain the encryption code.

Diane Maupai: Thank you, Deanna. CR 10611 indicates an effective date of June 12th, 2018. You indicated in the presentation an early July/June implementation. How will this impact the December 31, 2017, Medicare cost reports? Oh, okay, due on May 31, 2018. Okay, give us a minute. All right.

Geoff Kuhn: This is Geoff. The formal effective date of the CR is 6/12 as noted. But MCR_{EF} is still available for you to use as of today. And MACs have been instructed to accept cost reports through the portal as of today.

Diane Maupai: Thank you, Geoff. We're going to take one more question. Are there specific MAC officials that we should contact to deal with MCR_{EF} issues?

Geoff Kuhn: This is Geoff. No, there is no specific MAC resource. Whoever your existing MAC contacts are for handling cost report submission and questions is who you should talk to about MCR_{EF}.

Diane Maupai: Unfortunately, that's all the time we have for questions today. If you didn't get an answer to your question, you can email the address on slide 39.

Additional Information

On slide 40, you'll find information on how to evaluate your experience with today's event. We'll also push out the link to the evaluation to our webcast participants right now. Evaluations are anonymous, confidential, and voluntary. But we hope you'll take a few minutes to give us your feedback.

Thank you to Linda and to Patrick and Geoff for answering all those questions. And thank you for joining us for today's Medicare Learning Network webcast. Have a great day.

Operator: This concludes today's call. Presenters, please hold.