

mln webcast

A MEDICARE LEARNING NETWORK® (MLN) EVENT

Submitting Your Medicare Part A Cost Report Electronically

Thursday, March 28, 2019

Presenters:

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Acronyms in this Presentation

- BSO Backup Security Official
- CCN CMS Certification Number
- CMHC Community Mental Health Center
- ECR Electronic Cost Report
- EIDM Enterprise Identity Management system
- ESRD End Stage Renal Disease
- FQHC Federally Qualified Health Center
- FTE Full Time Equivalent
- FYB Fiscal Year Begin
- FYE Fiscal Year End
- GME Graduate Medical Education
- HHA Home Health Agency
- Histolab Histocompatibility Laboratory
- HO Home Office
- IME Indirect Medical Education
- IPPS Inpatient Prospective Payment System

- IRIS Intern and Resident Information System
- LPIC Limited Purpose Insurance Company
- MAC Medicare Administrative Contractor
- MCR Medicare Cost Report
- MCReF Medicare Cost Report e-Filing system
- NPR- Notice of Program Reimbursement
- OPA Organ Procurement Agency
- PHI Protected Health Information
- PII Personally Identifiable Information
- PS&R Provider Statistical and Reimbursement System
- RHC Rural Health Clinic
- SNF Skilled Nursing Facility
- SO Security Official
- STAR System for Tracking Audit and Reimbursement





Meeting Overview

- Introduce the Medicare Cost Report e-Filing system (MCReF)
- Communicate additional resources and information available





Agenda

- Introductions
- Background and Overview
- MCReF Walkthrough and Detailed Overview
- Ongoing Outreach and Education
- Q&A





Business Overview

- Medicare Cost Report (MCR) is used to determine Part A providers' annual Medicare reimbursable cost.
- Providers use a variety of sources (including Provider Statistical and Reimbursement system (PS&R) claim reimbursement data) to create their MCR.
 - There are about 50,000 MCRs submitted each year that account for over \$200 Billion of Medicare reimbursement.
- Regulation specifies deadline for submitting an acceptable cost report
- Medicare Administrative Contractors (MACs) have requirements for receiving, accepting, reviewing, auditing, and finalizing cost reports.





Historical Model: Physical Cost Report Submission and Receipt Process – High Level

- You create a cost report package which includes:
 - Electronic media, computer-readable version of the cost report (custom text file);
 - Human readable version (PDF);
 - Interns and residents data (IRIS);
 - Required supporting materials; and
 - Worksheet S with an original inked signature by an officer of the provider.
- Most cost reports are mailed or hand-delivered; a few are transmitted via MAC portals.
- MACs have 30 days from receipt to perform an acceptability review.





CMS Goal

- Standardize, automate, and streamline the cost report processes for
 - Provider submission
 - MAC receipt, acceptance, and subsequent handling





MCReF – High Level System Overview

- MCReF a new application allowing Part A providers to electronically transmit (e-File) their MCR package
 - Available since 5/1/2018
 - Usage is optional. Mail and hand-delivery remain filing options.
 - Accessible by your EIDM PS&R Security Official (SO), Backup Security Official (BSO), and MCReF Approved Cost Report Filer.
- Your MAC will have access to e-Filed cost report materials





Advantages of MCReF for Providers

- Single easy to use webpage
- One process for all providers via one submission portal
 - Available to all Part A providers regardless of MAC
 - Beneficial to chain organizations which have providers at multiple MACs, and any time you change MACs
 - Reduces confusion, delays, and time you spend on administrative processes
- Immediate feedback on the receivability of your MCR submission





New MCR Submission Process





MCReF Detailed Overview

- System Login: https://mcref.cms.gov
- Access is controlled by EIDM
 - Restricted to EIDM PS&R SO / BSO / MCReF Approved Cost Report Filer (new role as of May 2018)
 - Existing PS&R SOs / BSOs already have access
 - Any organization without access to PS&R must register a PS&R SO with EIDM.
 - Note: If you want to use MCReF, keep your EIDM accounts in good-standing.
 - Includes password updates and timely replacement of SOs.
 - EIDM credential issues are not a valid reason for late MCR filing.
- EIDM Enhancement (available as of 9/10/2018): Allows for multiple open role requests to be made within EIDM.





MCReF Login via EIDM

CMS.gov Enterprise Portal

Centers for Medicare & Medicaid Services

Health Care Quality Improvement System Provider Resources

System Use Notification

OMB No.0938-1236 | Expiration Date: 04/30/2017 (OMB Re-Certification Pending) | Paperwork Reduction Act

This warning banner provides privacy and security notices consistent with applicable federal laws, directives, and other federal guidance for accessing this Government system, which includes (1) this computer network, (2) all computers connected to this network, and (3) all devices and storage media attached to this network or to a computer on this network.

This system is provided for Government authorized use only.

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By using this system, you understand and consent to the following:

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- Any communication or data transiting or stored on this system may be disclosed or used for any lawful Government purpose.

To continue, you must accept the terms and conditions. If you decline, your login will automatically be cancelled.

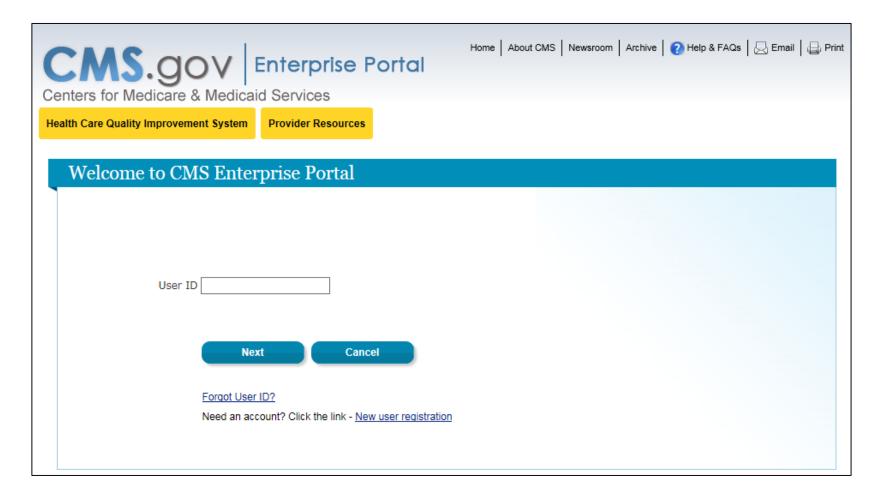


I Accept

Decline



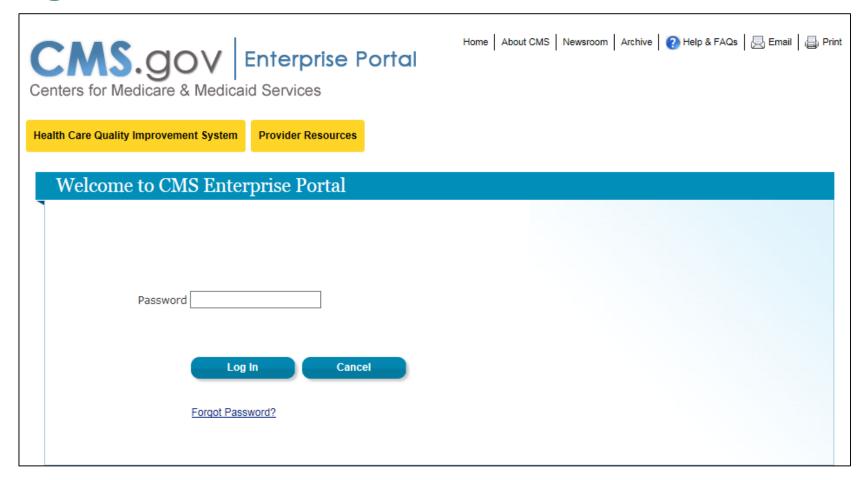
MCReF Login via EIDM







MCReF Login via EIDM







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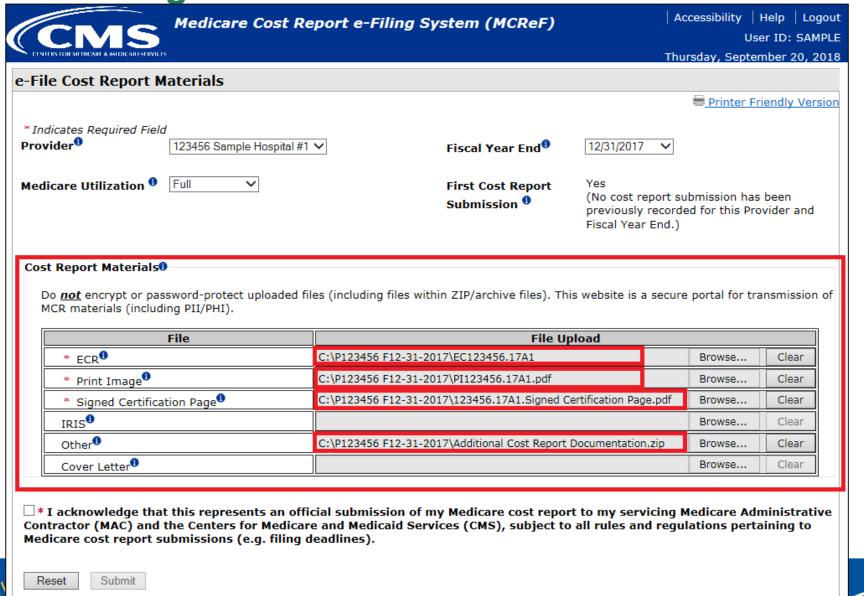
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Reset

cancel this e-filing.

Submit





Medicare Cost Report e-Filing System (MCReF)

Accessibility | Help | Logout

User ID: SAMPLE

Thursday, September 20, 2018

Success Message

Success S0000: The cost report submission has been electronically postmarked with CMS. Please retain the information referenced below for your records.

e-File Cost Report Materials - Confirmation

Printer Friendly Version

Cost Report Submission Details

e-Filing ID: 2769861

e-Postmark Date: 09/20/2018 11:41 AM ET

Provider: 123456 Sample Hospital #1

Fiscal Year End: 12/31/2017

Medicare Utilization: Full

First Cost Report Submission: Yes

ECR: EC123456.17A1

Print Image: PI123456.17A1.pdf

Signed Certification Page: 123456.17A1.Signed Certification Page.pdf

IRIS: No File Submitted

Other: Additional Cost Report Documentation.zip

Cover Letter: No File Submitted

Note: Save a copy of this page for your records. Once you navigate away from this screen, you will no longer be able to view this information.



File another cost report





MCReF Fields

Field Name	Description
*Provider	Contains all CMS Certification Numbers (CCNs) that have been registered in EIDM which the provider's MAC also has on record in CMS' System for Tracking Audit and Reimbursement (STAR; a MAC maintained system).
*Fiscal Year End	Contains the Fiscal Year Ends (FYEs) of the selected provider which have occurred in the past 6 years that are on or after 12/31/2017 as recorded by the provider's MAC in STAR.
Medicare Utilization	Allows the provider to select the Medicare Utilization level of the MCR being e-Filed. Options include: 'Full', 'Low', and 'No'.
First Cost Report Submission	Indicates whether or not an MCR has already been recorded in STAR as received by the provider's MAC for the selected Provider/FYE.
Cost Report Materials table	Used to upload all materials needed to submit a complete MCR package. This may include an ECR, Print Image, Signed Certification Page, IRIS, Cover Letter, and any additional files via the "Other" slot.

*Note: If you are unable to locate your CCN or Fiscal Year End in your corresponding drop-down:

- Confirm that the SO of your organization has properly registered the CCN in question within EIDM and that you are registered to the organization with an EIDM role which grants e-Filing privileges.
- If so, and you still don't see what you're looking for, contact your MAC.





Cost Report Materials

On-screen Row Label	Description
ECR	The electronic cost report file (also known as the 'EC', 'SN', 'HH', 'HS', 'RD', 'RF', 'FQ', or 'CM' file) System-required: For all providers filing a Full Medicare Utilization MCR except Home Offices (HOs) and Limited Purpose Insurance Companies (LPICs) Format: A single file generated using a current version of CMS-certified ECR vendor software that is not a PDF, ZIP file or other archive file type File limit: 1 MB
Print Image	The human-readable copy of the cost report, also known as the "PI file" (for Home Offices: the 287-05 cost statement) System-required: • For all providers filing a Full or Low Medicare Utilization MCR except LPICs. • If an ECR file is uploaded to the ECR row Format: Any human-readable format generated using a current version of CMS-certified ECR vendor software that is not a ZIP file or other archive file type File limit: 10 MB
Signed Certification Page	The electronically-signed Worksheet S certification page (for Home Offices: the 287-05 Schedule A) System-required: For all providers <u>except</u> LPICs Format: Any human-readable format, including encryption codes, generated using a current version of CMS-certified ECR vendor software that is not a ZIP file or other archive file type File limit: 10 MB

Cost Report Materials

On-screen Row Label	Description
IRIS	The Interns and Residents Information System (IRIS) files required for teaching hospitals claiming GME/IME Full Time Equivalents (FTEs) on their cost report System-required: Not presently required by the system, but may do so in the future Format: An unencrypted ZIP file containing a single set of "M" (Master) and "A" (Assignment) DBF files File limit: 1 MB
Other	Upload any other file(s) needed for the submission to constitute a complete filing which do not otherwise have dedicated slots (i.e. Working Trial Balance, Bad Debt Listing, etc.) System-required: For all LPIC provider MCRs Format: Supports any file type, including support for multiple files within a single unencrypted ZIP file or other archive file type File limit: 300 MB (including total attached file size)
Cover Letter	A document describing the nature of the submission or any other information about the submission which the provider wishes to communicate to the MAC up front System-required: For all revised MCRs Format: Any human-readable format that is not a ZIP file or other archive file type File limit: 10 MB





MCReF Edits

e-Filing Submission:

- The system will perform "receivability" validations to confirm if your MCR is fundamentally sound (see next slide)
- If any error is displayed, your MCR will not be received.
 - Not considered rejections and do not follow CMS' formal MCR rejection processes.
- If the submission passes all "receivability" validations, you will be directed to a Confirmation screen. This screen will display the following:
 - A success message stating that your MCR is received
 - Your e-Postmark date in Eastern Time, unique e-Filing ID, and all selections for the submission just made
- Confirmation screen: save a copy of this screen's content for your records





"Receivability" Criteria for an e-Filed MCR

- All required MCR Material files are included, in valid format, and within the size limits (as detailed on Slides 21 and 22)
- Attached files conform to technical restrictions (must be virus/malware free, have valid filenames, must not be blank/empty)
- Can only submit up to 1 revision per day for the FYE
 - A revision can be submitted prior to acceptance, or can be used to submit an amended cost report submission after As-Filed acceptance
 - Note: You may request via e-mail or mail that your MAC "reject" an erroneous MCR so you can submit a revision on the same day
- FYE within the past 6 years and is on or after 12/31/2017 (present in the drop-down)
- Provider, FYB, FYE must exist in STAR and match the ECR file (if provided)
- Provider / FYE specified is not Locked in STAR (e.g.: Admin. Closed), not a subunit, and does not already have a Finalized NPR present in STAR
- Subunits and Consolidated FQHC/RHC Units in the ECR file match those listed in STAR for the family when filing a Full Medicare Utilization MCR.





MCReF Additional Details

- You will be warned if:
 - MCR submission is late
 - You try to upload an MCR generated with outdated software
- Timely receipt of the cost report will be measured based on 11:59 PM ET for the provider's cost report due date
- Files uploaded are <u>not</u> to be encrypted or password protected. MCReF is a secure portal for transmission of MCR materials (including PII/PHI)
- Duplicate submissions will be rejected by the MAC; only the first MCR received by the MAC will be processed.
- The first MCR received by the MAC (either via MCReF or mail/hand-delivery) will be treated as the provider's first cost report submission for the year.
 - If an MCR is mailed in prior to the MCR Due Date, and an MCR is submitted via MCReF after the MCR Due Date but prior to the receipt of the mailed in submission by the MAC, MCReF will warn the user that this will cause your MCR to be considered late.





MCReF Additional Details

- Effective 1/2/2019, only 2 CMS-approved methods of MCR submission:
 - Electronic submission via MCReF
 - Physical submission via mail or hand-delivery
- All MCRs for Fiscal Year Ends on or after 12/31/2017 can be e-Filed via MCReF, with the following exceptions that may need to be mailed or hand-delivered:
 - MCRs that would satisfy CMS' Acceptability Criteria but would not pass the "Receivability" checks must be
 filed via mail or hand-delivery (e.g., a submission with more than 300 MB of "Other" documentation).
- Providers will not receive an extension for system issues preventing e-Filing.





Electronic Signature

- 2018 IPPS final rule issued in August 2017, authorizes providers to file with an electronic signature effective for FYEs on/after 12/31/2017.
 - Note: IPPS final rule does not change the authorized signatories (CFR §413.24(f)(4)(iv)(C))
- CMS has released new MCR transmittals which support e-signature for the majority of current MCR Forms
 - An approved form of e-signature (per the 2018 IPPS final rule) is required for signing and subsequently uploading the "Signed Certification Page" in MCReF
 - <u>If</u> you file via MCReF using MCR forms 222-92 (old RHC form), 2088-92 (old CMHC form), or 287-05 (current Home Office form), which <u>do not</u> support e-signature, you must
 - Upload a scanned copy of the certification page via the "Signed Certification Page" slot.
 - Mail/hand-deliver a hard copy with a signature signed in ink to your MAC which must be received by the MAC within 10-days of MCR submission.





Electronic Signature

MCR Version	Provider Type	Currently e-Signature Capable?
2552-10	Hospital	Yes
2540-10	SNF	Yes
265-11	ESRD	Yes
224-14	FQHC	Yes
1728-94	ННА	Yes
216-94	OPO / HISTOLAB	Yes
1984-14	Hospice	Yes
222-92	RHC	No (hard copy with a signature signed in ink still required per previous slide)
222-17	RHC	Yes
2088-92	CMHC	No (hard copy with a signature signed in ink still required per previous slide)
2088-17	СМНС	Yes
287-05	Home Office	No (hard copy with a signature signed in ink still required per previous slide)





Electronic Signature

- The next few slides provide examples of valid and invalid uses of esignature
- These examples are not the exhaustive list of all possible valid and invalid uses of e-signature
- Refer to the 2018 IPPS final rule for e-signature guidance





Valid use of e-signature

E-signature checkbox checked and typed First and Last Name

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Ľ	t have read and agree with the above certific equivalent of my original signature.	ation statement. I certify that I intend my electronic signs	ature on this certification s	tatement to be the leg	gally binding
		(Signed) Andrew Smith	Michaelson III		
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Valid use of e-signature Printed, e-signature checkbox Checked and Signed, Scanned

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	4. [] Medicare Utilization. Enter "I	F" for full or "L" for low.			
Contractor	5. [] Cost Report Status	6. Date Received:	10. NPR Date:		
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and 1	regulations.				
	3				
✓	I have read and agree with the above certific	ation statement. I certify that I intend my electronic signal	ture on this certification s	tatement to be the le	gally binding
_	equivalent of my original signature.				
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Invalid use of e-signature E-signature checkbox not checked

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Invalid use of e-signature Signature must contain First and Last Name

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MCReF Provider User Experience





MCReF Provider Testing

- 6 provider organizations (representing ~150 Part A providers) volunteered to test MCReF.
- Participants were asked on a scale of 1-10 how likely they were to use MCReF. Average rating was 9.7 out of 10
- Quotes from feedback received:
 - "Very easy to use and to understand"
 - "System was quick to show errors and intended results"
 - "...an excellent experience and I am excited and anxious for it to go live"





MCReF Usage

- Since 5/1/2018:
 - Over 6,250 successful submissions from over 1,475 distinct users.
 - Median Submission Time: 3.4 seconds
 - Over 700 providers were able to correct errors with their MCR prior to submission and without the need for correspondence with their MAC, and potentially avoiding the rejection of their MCR
- Last 3 months: 1/3 of all MCR submissions were e-Filed via MCReF (including 1/2 of all Hospital MCR submissions)





Ongoing Outreach and Education





Ongoing Outreach and Education

- Change Request 10611 issued 4/30/18
- MLN Matters Article: https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/downloads/MM10611.pdf
- Webinars:
 - 5/1/18
 - 10/15/18
 - 3/28/19
- CMS website posting (https://www.cms.gov/Medicare/Compliance-and-Audits/Part-A-Cost-Report-Audit-and-Reimbursement/MCReF.html), includes links to:
 - How to Request User Roles
 - MCReF User Manual
 - MLN article
 - FAQs
- Documentation Updates (e.g.: 100-06, PRM 15-1 and 15-2, MCR Transmittal Forms, etc...)



Question & Answer Session





Resources

e-mail questions relating to MCReF to:

OFMDPAOQUESTIONS@CMS.HHS.GOV

- For any questions relating to your EIDM account (role requests, passwords, annual certifications, login, etc...) contact EUS Support Helpdesk:
 - Website: https://eus.custhelp.com/app/home
 - e-mail: EUSSupport@cgi.com
 - Phone: 1-866-484-8049 (TTY/TDD: 866-523-4759)





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