
CMS Manual System

Pub. 100-01 Medicare General Information, Eligibility, and Entitlement

Department of Health & Human Services (DHHS)
Centers for Medicare & Medicaid Services (CMS)

Transmittal 23

Date: MAY 6, 2005

CHANGE REQUEST 3862

SUBJECT: Procedures for Modifying Shared Systems Edits and Capturing Audit Trail Data

I. SUMMARY OF CHANGES: This instruction is to provide rules governing the application and/or revisions of Maintainer coded shared systems edits and to establish an audit trail of contractor modifications to these edits.

NEW/REVISED MATERIAL

EFFECTIVE DATE: *Edits Modified on or after October 1, 2005

IMPLEMENTATION DATE: October 3, 2005

Disclaimer for manual changes only: The revision date and transmittal number apply to the red italicized material only. Any other material was previously published and remains unchanged. However, if this revision contains a table of contents, you will receive the new/revised information only, and not the entire table of contents.

II. CHANGES IN MANUAL INSTRUCTIONS: (N/A if manual not updated.)

R = REVISED, N = NEW, D = DELETED – Only One Per Row.

R/N/D	CHAPTER/SECTION/SUBSECTION/TITLE
R	7/Table of Contents
N	7/60/Procedures for Modifying Shared System Edits and Capturing Audit Trail Data

III. FUNDING:

No additional funding will be provided by CMS; Contractor activities are to be carried out within their FY 2005 operating budgets.

IV. ATTACHMENTS:

X	Business Requirements
X	Manual Instruction
	Confidential Requirements
	One-Time Notification
	Recurring Update Notification

*Unless otherwise specified, the effective date is the date of service.

Attachment - Business Requirements

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SUBJECT: Procedures for Modifying Shared Systems Edits and Capturing Audit Trail Data

I. GENERAL INFORMATION

A. Background: During the course of a periodic electronic data processing audit, the Centers for Medicare and Medicaid services has been cited for a lack of consistent and effective application security, development and program change controls. This finding is specifically directed to contractor ability to negate system edits which leads to inaccurate claims processing and ultimately incorrect information being posted to Common Working File (CWF) and National Claims History (NCH).

B. Policy: Intermediaries and carriers shall examine their current processes for modifying maintainer coded shared system edits and adjust them to incorporate the appropriate levels of internal controls. Shared system maintainers (SSMs) must make modifications to their respective systems to provide the capability to track edit changes by contractors to their shared system edits.

II. BUSINESS REQUIREMENTS

"Shall" denotes a mandatory requirement

"Should" denotes an optional requirement

Requirement Number	Requirements	Responsibility ("X" indicates the columns that apply)							
		F I	R H I	C a r r i e r	D M E R C	Shared System Maintainers			
					F I S S	M C S	V M S	C W F	
3862.1	All shared systems must have an audit trail that tracks contractor modifications of maintainer coded shared systems edits.					X	X	X	
3862.1.1	The shared system audit trail must be traceable to who modified the edit.					X	X	X	
3862.1.2	The shared system audit trail must be able to identify what changed in the shared system edits.					X	X	X	

Requirement Number	Requirements	Responsibility (“X” indicates the columns that apply)								
		F I	R H I	C a r r i e r	D M E R C	Shared System Maintainers				Other
						F I S S	M C S	V M S	C W F	
3862.4	In the event that a shared system edit has been modified due to a system problem, that associated problem must be documented and reported to the SSM by the contractor.	X	X	X	X					
3862.5	SSMs and contractors must prioritize system changes to correct edit deficiencies that have caused the contractor(s) to disable any SSM edit(s) and schedule the correction(s) as soon as possible via the appropriate change control process.	X	X	X	X	X	X	X		

III. PROVIDER EDUCATION

Requirement Number	Requirements	Responsibility (“X” indicates the columns that apply)								
		F I	R H I	C a r r i e r	D M E R C	Shared System Maintainers				Other
						F I S S	M C S	V M S	C W F	
	None.									

IV. SUPPORTING INFORMATION AND POSSIBLE DESIGN CONSIDERATIONS

A. Other Instructions:

X-Ref Requirement #	Instructions

B. Design Considerations:

X-Ref Requirement #	Recommendation for Medicare System Requirements

- C. **Interfaces:** N/A
- D. **Contractor Financial Reporting /Workload Impact:** N/A
- E. **Dependencies:** N/A
- F. **Testing Considerations:** N/A

V. SCHEDULE, CONTACTS, AND FUNDING

<p>Effective Date*: Edits modified on or after October 1, 2005</p> <p>Implementation Date: October 3, 2005</p> <p>Pre-Implementation Contact(s): Karen Allen 410 786-1705</p> <p>Post-Implementation Contact(s): Appropriate regional office</p>	<p>No additional funding will be provided by CMS; Contractor activities are to be carried out within their FY 2005 operating budgets.</p>
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***Unless otherwise specified, the effective date is the date of service.**

General Information, Eligibility, and Entitlement Manual

Chapter 7 - Contract Administrative Requirements

Table of Contents

(Rev.23, 05-06-05)

60 – Procedures for Modifying Shared System Edits and Capturing Audit Trail Data

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(Rev. 23, Issued: 05-06-05; Effective: 10-01-05; Implementation: 10-03-05)

POLICY

Contractors must implement processes and procedures for adding, deleting, inactivating, bypassing or otherwise modifying all shared system edits. Contractors must also have the capability to document and track those modifications. Modifications to maintainer coded edits must additionally include documentation that provides the rationale for the modification, the expected duration of the change, the impact of the change with respect to potential over or underpayments, claims volumes, affect on providers and / or beneficiaries, etc. In addition, the claims operations manager or equivalent area manager must document approval of the edit modification followed by CMS approval before any maintainer coded edit change has been made.

Intermediaries and carriers shall examine their current processes for modifying shared system edits and adjust them to incorporate the appropriate levels of internal controls. These controls must be documented and available upon request for review by CMS or an auditor. In addition, contractors must limit the number of personnel with the security clearance to modify maintainer coded shared system edits to ten (10).

Should the reason for an edit modification be because of a shared system deficiency, that associated problem must be documented and reported to the maintainer by the contractor. The shared system maintainer and contractor must prioritize the appropriate systems changes to correct edit deficiencies and schedule them for correction as soon as possible via existing change management processes. Should there not be consensus with the contractors regarding schedule, CMS maintenance staff should be consulted.

Shared system maintainers must have the capability to track edit changes made by a contractor to the maintainer coded shared system edits. The shared systems must be able to identify who modified the edit, what was modified and when the alteration was made.