



Centers for Medicare & Medicaid Services (CMS)

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HIPAA Eligibility Transaction System (HETS) Data Issues

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1 OPEN DATA ISSUES

Table 1 identifies currently open HETS 270/271 data issues.

Table 1: Open HETS Data Issues

Current Data Issues	Approximate Number of Impacted Medicare Beneficiaries	Date the Issue Started	Release or Date that a Fix is Planned	Detailed Description of the Issue
n/a	n/a	n/a	n/a	n/a

2 RESOLVED DATA ISSUES

Table 2 identifies resolved HETS 270/271 data issues.

Table 2: Resolved HETS Data Issues

Resolved Data Issues	Approximate Number of Impacted Medicare Beneficiaries	Date the Issue Started	Date the Issue was Resolved	Detailed Description of the Issue
HCPCS codes C9787 and C9790 were accepted by HETS as valid (although non-supported) codes on 270 requests from July 1, 2024 – July 10, 2024.	n/a	July 1, 2024	July 10, 2024	<p><i>Summary:</i> HETS accepted invalid HCPCS codes as valid for the dates of July 1, 2024 – July 10, 2024. HETS is now properly treating these codes as invalid HCPCS.</p> <p><i>Detail:</i> CMS publishes regular HCPCS updates to the industry. HETS leverages a product provided by an EDI translator software vendor to ensure that all HCPCS updates are processed in a timely manner, thus ensuring continued HIPAA compliance.</p> <p>The EDI translator software vendor did not deliver a timely file update for HCPCS codes C9787 and C9790 which were discontinued effective July 1, 2024. While HETS has never supported these two HCPCS codes with eligibility information, HETS was accepting the codes as valid HCPCS. If either of these two codes were within the first ten HCPCS submitted on a HETS 270 request, HETS would return a Y / N value indicating whether these HCPCS require Prior Authorization.</p> <p>HETS continued to accept these HCPCS codes until the EDI translator software vendor provided a file update which reflected that these codes were discontinued effective July 1, 2024. HETS received and processed that file update on the evening of July 10, 2024. HETS now correctly rejects any 270 requests that contain these (or any other invalid) HCPCS code with a 999 response.</p>

CMS HETS DATA ISSUES

Resolved Data Issues	Approximate Number of Impacted Medicare Beneficiaries	Date the Issue Started	Date the Issue was Resolved	Detailed Description of the Issue
HETS did not return updated information related to revised Medicare Diabetes Prevention Program (MDPP) HCPCS codes until June 2024.	n/a	January, 2024	June 29, 2024	Medicare made substantial changes to the MDPP Expanded Model for calendar year 2024. HETS did not receive or process information related to these new MDPP changes until Summer, 2024. Effective June 29, 2024 HETS now has the ability to return updated MDPP HCPCS codes G9886, G9887 and/or G9888.
HETS was not returning Hospice Notice of Election (NOE) records for select Medicare Beneficiaries.	<1%	April 8, 2024	April 22, 2024	For a select population of Medicare Beneficiaries, HETS was not returning Hospice NOE data, including start and end dates as well as revocation dates and codes. HETS updated its procedure to ensure that the application properly processed all updates to NOE records. Proper NOE records returned after this correction.
Select Part A Inpatient Hospital/Skilled Nursing Facility (SNF) admission and/or discharge dates were not being returned on the HETS 271 response.	<1%	September, 2023	November 14, 2023	HETS receives inpatient/SNF data from CWF, but for a limited number of Medicare beneficiaries, CWF did not provide the full admission and/or discharge Hospital or SNF data. CWF implemented a fix and performed a full data refresh to resolve the impacted beneficiary records.
HETS Medicare Secondary Payer (MSP) data including the Ongoing Responsibility for Medicals (ORM) indicator data availability.	n/a	October 3, 2023	October 21, 2023	HETS began receiving the MSP ORM indicator on the daily CWF data files on October 3, 2023. However, only partial MSP ORM data was available until a full refresh of MSPs for all beneficiaries with an ORM indicator was completed on October 21, 2023.
The HETS 271 response for End Stage Renal Disease (ESRD) includes the ESRD Clinical Dialysis Start and/or End Dates. CMS planned to update the HETS 271 response with the ESRD Dialysis Start and/or End Dates.	15%	March 2019	Verified that HETS was correctly returning ESRD Dialysis dates in April 2023	After additional discussions with upstream data systems, it was determined that the problem was an issue in CWF and HETS is correctly returning the Clinical Dialysis date. CWF will update its data.

CMS HETS DATA ISSUES

Resolved Data Issues	Approximate Number of Impacted Medicare Beneficiaries	Date the Issue Started	Date the Issue was Resolved	Detailed Description of the Issue
HETS Benefit Utilization data issue	4.5%	October 2022	January 24, 2023	CMS identified a data issue with the Beneficiary Benefit Utilization data from the data source (CWF); this impacted prior Benefit Utilization data only.
The HETS 271 response included Medicare Secondary Payer (MSP) enrollments that were previously terminated.	<1%	September 2022	November 4, 2022	The HETS 271 response included select Medicare Secondary Payer (MSP). HETS was updated to remove any terminated MSP enrollments prior to returning that data in the HETS 271 response.
HETS' eligibility response was not returning prior usage for HCPCS code 71271 (Lung Cancer Screening) for a subset of Medicare Beneficiaries.	25%	July 2021	September 2022	HETS supports preventative service HCPCS code 71271 for "Computed tomography, thorax, low dose for lung cancer screening, without contrast material(s)". HETS' eligibility response was not returning prior usage for HCPCS 71271 for a subset of Medicare Beneficiaries. Upstream systems were updated to resolve this issue and ensure that prior usage for HCPCS 71271 was returned for all appropriate Medicare Beneficiaries.
HETS was not returning complete Hospice episode information for select beneficiaries.	<1%	~10/4/2021	First week of March, 2022	HETS Hospice records were incomplete for a limited number of beneficiaries. The Common Working File (CWF), HETS' information source for Hospice information, experienced an issue between October 4-13, 2021. Any Hospice record updates that were processed in CWF during these dates were not passed down to HETS, and therefore HETS did not return any information contained within those updates. CWF performed maintenance that corrected the issue.
HETS was not returning historical Pneumococcal Pneumonia Vaccination (PPV) usage when a Medicare Beneficiary only had active Medicare Part A entitlement.	<1%	October 30, 2020	November 20, 2020	HETS was only returning historical Pneumococcal Pneumonia Vaccination (PPV) occurrences on the 271 eligibility response for Medicare Beneficiaries with active Medicare Part B entitlement. HETS was modified to return historical PPV usage for all active Medicare Beneficiaries.

CMS HETS DATA ISSUES

Resolved Data Issues	Approximate Number of Impacted Medicare Beneficiaries	Date the Issue Started	Date the Issue was Resolved	Detailed Description of the Issue
HETS was not returning Pneumococcal Pneumonia Vaccination (PPV) occurrences that occurred prior to 2018.	<1%	April 2020	October 30, 2020	When PPV HCPCS 90670 and/or 90732 are submitted on the 270 eligibility request, HETS returns up to 10 episodes of prior service history for each PPV code. However, upstream systems were not providing Pneumococcal Pneumonia Vaccination (PPV) occurrences that occurred prior to 2018. The upstream systems were updated to return up to 10 episodes for each code as intended.
HETS was not returning the 271 2110C HSD loop (which contains Hospice Days Used) if the Medicare Beneficiary had zero (0) Hospice Days used reflected on the Beneficiary record.	<1%	October 10, 2020	October 23, 2020	The HETS R2020Q300 release enhanced the HETS 271 response to return Hospice DOEBA-DOLBA and Hospice Days Used if Service Type Code '45' was submitted on the 270, the Beneficiary had Medicare Part A eligibility and the Medicare Beneficiary has prior Hospice usage within the last four years. This enhancement was activated October 10, 2020. Following that release, however, the HETS 271 response was not returning the 2110C HSD loop with Hospice Days Used if the Medicare Beneficiary had no prior Hospice Days Used on their record. The Hospice DOEBA-DOLBA may have been returned if the prior Hospice episode occurred within the last four years. HETS was updated to return the appropriate 271 2110C HSD loop in all appropriate circumstances.
HETS was not returning an MSG segment with the Home Health Patient Status Code on the 271 response for any episodes where the Medicare Beneficiary has an invalid Patient Status Code of '00'.	<1%	June 2020	October 10, 2020	The HETS 271 response was modified in June 2020 to return the Home Health Patient Status Code as an MSG segment if Service Type Code 42 was sent on the 270 request and the Medicare Beneficiary had a Home Health Patient Status Code on file. HETS was returning this information properly except for the cases where upstream systems have an invalid Patient Status Code of '00' on file for historical data. This issue was resolved.

CMS HETS DATA ISSUES

Resolved Data Issues	Approximate Number of Impacted Medicare Beneficiaries	Date the Issue Started	Date the Issue was Resolved	Detailed Description of the Issue
HETS was not returning End Stage Renal Disease (ESRD) period information for Medicare Beneficiaries if the period's Transplant Rejection Date or Dialysis End Date occurred greater than 4 years in the past.	<1%	August 2020	October 10, 2020	HETS returns ESRD information on the 271 response when Service Type Code 'CQ' or 'RN' are included in the 270 request. When requested, HETS should return all ESRD episodes that overlap with the requested Date(s) of Service. HETS was omitting ESRD episodes if that period's Transplant Rejection Date and/or Dialysis End Date occurred greater than 4 years in the past. HETS was updated to include all components of the ESRD period that did occur within the last 4 years.
After the Medicare Beneficiary received the first Pneumococcal Vaccine (PPV), CWF was not sending the eligibility information for the second PPV vaccine to HETS.	33%	Ongoing	June 13, 2020	HETS' data source for prior PPV usage is the Common Working File (CWF). HETS returns PPV vaccination data using CWF records for HCPCS 90670 and 90732. Prior to this fix, HETS was correctly returning the PPV vaccination next eligible dates for both HCPCS if the Medicare Beneficiary has never been vaccinated. However, if the HETS 271 returned no next eligible date available for PPV, the Medicare Beneficiary may have actually only received one of the PPV vaccines and may have still be eligible for the second vaccine after a year between deliveries. This situation was resolved upstream. CMS encourages Providers to discuss the Pneumococcal vaccine and any previous receipt of that vaccine with your patients.
In specific situations where a Medicare Beneficiary transferred between different Hospice providers, the HETS 271 response is returning duplicate Hospice episodes with different revocation codes.	Unknown	November 2019	March 13, 2020	In very specific situations (where the Hospice provider posted a revocation and new election when the receiving Hospice should have just submitted a transfer notice instead), the HETS 271 response is returning duplicate Hospice episodes for the same period with different revocation codes. The Hospice episodes dates and NPI used in the duplicative periods are in fact correct just duplicated. The duplicate periods were removed.

CMS HETS DATA ISSUES

Resolved Data Issues	Approximate Number of Impacted Medicare Beneficiaries	Date the Issue Started	Date the Issue was Resolved	Detailed Description of the Issue
A very small number of Medicare Beneficiary Hospice period records do not contain a valid rendering facility NPI number.	<1%	Unknown	February 17, 2019	A very small number of Medicare Beneficiary Hospice period CWF records do not contain a valid rendering facility NPI number. CWF is the source of Hospice data for HETS. HETS previously returned an error for these Medicare Beneficiaries if the Hospice Service Type Code was present on the 270. For these specific Medicare Beneficiaries only, CMS modified the HETS 271 response and now returns Hospice history without a rendering NPI for any episodes that contained an invalid rendering facility NPI. HETS continues to return the rendering NPI as part of the Hospice history for the vast majority of Medicare Beneficiaries.
The next eligible date (PROF/TECH) for HCPCS G0297 (Low dose CT scan [LDCT] for lung cancer screening) was not displaying/returning correctly by CWF (impacting HIMR, ELGA, and HETS) when the Beneficiary's Part B Effective Date was after the Effective Date (02/05/2015) of the G0297 HCPCS code.	Approx. 100 Beneficiaries	Unknown	December 9, 2019	Code changes were made by CWF to correct Professional and Technical next eligible dates when the Beneficiary's Part B Effective Date was after the Effective Date (02/05/2015) of the 'G0297' HCPCS code. These changes were effective on December 9, 2019.
HETS historical Hospice episode information was limited to 49 months of historical data.	Unknown	November 2, 2019	November 18, 2019	The HETS 271 response was modified in November 2019 to return all historical Hospice information regardless of whether the requested Date(s) of Service intersected with the Hospice episode. After this change, HETS was initially not returning any Hospice episodes older than 49 months.

CMS HETS DATA ISSUES

Resolved Data Issues	Approximate Number of Impacted Medicare Beneficiaries	Date the Issue Started	Date the Issue was Resolved	Detailed Description of the Issue
Medicare Secondary Payer data was not returning all enrollment periods and plan information for select beneficiaries.	Unknown	October 7, 2019	November 18, 2019	<p>HETS Medicare Secondary Payer (MSP) records were not current for a limited number of beneficiaries. The Common Working File (CWF), HETS' MSP information source, implemented system changes October 7, 2019. The CWF changes inadvertently resulted in sharing beneficiary MSP updates or new occurrences with HETS only when there are claims activity. The CWF MSP data was accurate, but HETS was not. If a beneficiary's MSP information changed after October 7, 2019, and there had been no CWF claims activity for that beneficiary, HETS MSP data was not current. While there was no impact to claims processing, if Providers submitted a claim to Medicare as primary payer based on HETS inaccurate MSP data and Medicare is not the primary payer, Medicare would deny the claim because Providers must bill the primary payer.</p> <p>However, that claim action would also update HETS MSP data to reflect another payer as primary. CMS corrected this issue November 18, 2019.</p>
HETS was returning incorrect Hospice episode information or occurrence counts when the Medicare Beneficiary had a new Notice of Election (NOE) and had billed Hospice episodes four or more years ago.	1%	Prior to March 2019	November 4, 2019	<p>HETS' data source for Hospice information is the Common Working File (CWF). CMS identified an issue where CWF was sending incorrect Hospice information to other systems (including HETS) when the Medicare Beneficiary had a new Notice of Election (NOE) and previously billed hospice periods. CWF updates the file and corrects the Hospice history once a Hospice claim is processed for the new billing period.</p> <p>CWF updated their database and processes to resolve these discrepancies and prevent future occurrences. The HETS 271 response was also modified to return all historic Hospice episodes instead of an occurrence count.</p>

CMS HETS DATA ISSUES

Resolved Data Issues	Approximate Number of Impacted Medicare Beneficiaries	Date the Issue Started	Date the Issue was Resolved	Detailed Description of the Issue
CMS identified a more accurate source of data for End Stage Renal Disease (ESRD) Dialysis Start Date and ESRD Dialysis End Date.	1%	August 2019	August 2019	HETS returns ESRD information on the 271 response when Service Type Code 'CQ' or 'RN' are included in the 270 request. CMS identified a previous issue with the data source used for the End Stage Renal Disease (ESRD) Dialysis Start Date and ESRD Dialysis End Date. CMS corrected this issue by utilizing an improved ESRD data source. The X12 format of the 271 response was unchanged.
HETS was not returning Medicare Advantage (MA) plan coverage for selected MA plans.	1%	November 2017	March 2018	In particular circumstances, HETS was not returning MA coverage and plan information for Medicare Beneficiaries that had active MA coverage. This was limited to MA plans where there was no Plan Benefit Package (PBP) number on file in the MA plan database.

3 APPENDIX A - REVISION HISTORY

Table 3 provides a summary of changes made to this document.

Table 3: Document Revision History

Version	Date	Description of Changes
1-39	07/16/2024	Moved MDPP issue and HCPCS compliance issues from open (Table 1) to resolved (Table 2)
1-38	06/28/2024	Added new HCPCS compliance issue to open (Table 1)
1-37	04/24/2024	Moved Hospice NOE issue from open (Table 1) to resolved (Table 2)
1-36	04/19/2024	Added new Hospice NOE issue to open (Table 1). Updated MDPP issue in Table 1
1-35	01/03/2024	Added new MDPP issue to open (Table 1)
1-34	11/15/2023	Moved Part A Hospital/SNF issue from open (Table 1) to resolved (Table 2)
1-33	10/25/2023	Added new Part A Hospital/SNF issue to open (Table 1). Moved MSP ORM issue from open (Table 1) to resolved (Table 2). Display order of resolved issues in Table 2 changed to display the most recently resolved issue first
1-32	10/11/2023	Changed MSP ORM issue planned fix date to 'TBD'. Updated detailed item to indicate that resolution status is TBD
1-31	10/03/2023	Added new MSP ORM issue to open (Table 1)