Electronic Submission of Medical Documentation (esMD)
Annual Report
October 1, 2012 – September 30, 2013

OVER 457,844 MEDICAL RECORDS WERE SENT THROUGH CMS' esMD SYSTEM DURING ITS SECOND YEAR!

The Centers for Medicare & Medicaid Services (CMS) utilizes several types of review contractors to measure, prevent, identify, and correct improper payments or identify potential fraud.

Review contractors find improper payments and potential fraud by reviewing a sample of claims. They request medical documentation from the provider or supplier and manually review the claims against the medical documentation to verify the providers' compliance with Medicare's rules.

Prior to 2011, hospitals, physicians and other medical providers sent medical records via mail or fax to the requesting review contractor. Providers often criticized the paper-based process as being costly and time consuming. Many providers, especially those who use electronic health records, requested an electronic means to respond to these documentation requests.

On September 15, 2011, CMS implemented the Electronic Submission of Medical Documentation (esMD) system which enables providers to send medical documentation to review contractors electronically. The system is based on standards developed by the Office of the National Coordinator for Health IT.

To access the esMD system, providers can either build their own gateway that will connect to the CMS esMD Gateway, or contract with a CMS-Certified Health Information Handler (HIH). As of 9/30/2013, no providers had chosen to build their own gateway.

While esMD is not mandatory, many healthcare providers find that it reduces cost and increases efficiencies. In order to address provider concerns, CMS has instructed review contractors not to target providers for medical review based on their use of esMD.

Accomplishments during Fiscal Year (FY) 2013

- In September 2012, CMS implemented a Prior Authorization (PA) process via the esMD Gateway for Power Mobility Devices (PMD) for FFS Medicare beneficiaries who reside in seven states with high populations of error prone providers (CA, IL, MI, NY, NC, FL and TX).

- In January 2013, CMS expanded the esMD Gateway to allow Durable Medical Equipment (DME) suppliers and providers to send electronic PA Requests to Medicare review contractors.

- In June 2013, CMS enabled automated PA Review Results responses from Medicare review contractors to HIHs via the esMD Gateway.

- The number of participants in the CMS esMD Program has grown steadily since its inception. As of <u>September 30, 2013</u>:

  o **30,199 Medicare Providers** (hospitals, physicians, and other medical providers) use esMD to respond to a medical record requests;
  o **55 Medicare Providers** use esMD to submit Prior Authorization Requests;
  o **24 HIHs** are certified by CMS to offer esMD services;
  o **27 Review Contractors** are approved by CMS to accept medical records via esMD.

The volume of Medical Records sent via esMD grew significantly in FY 2013. Between October 1, 2012 and September 30, 2013 the volume of medical records grew as follows:

Medical Records sent by Provider via esMD

	FY 2013/ Q1	*FY 2013/ Q2*	*FY 2013/ Q3*	*FY 2013/ Q4*
Medical Records sent in response to medical documentation request	59,495	104,619	143,215	150,515
Prior Authorization Requests sent	N/A	*712*	*388*	*584*

Responses received by Provider from Review Contractors via esMD

	FY 2013/ Q1	*FY 2013/ Q2*	*FY 2013/ Q3*	*FY 2013/ Q4*
Prior Authorization Responses received	N/A	*0*	*142*	*320*

Future enhancements planned for the esMD System:

- **Allow Providers to submit first level Appeals Requests**
Once an initial claim is denied for payment by Medicare, the participating providers and suppliers have the right to appeal. CMS plans to expand the esMD system to enable providers to submit first level appeals electronically starting in FY 2014. Review Contractors who are participating in the initial release for this functionality will do so on a volunteer basis. Please continue to check our website for additional information.

- **Allow Providers to submit Discussion Requests**
Currently, providers who want to request a discussion of the results of a recovery auditor contractor review must do so via mail or fax. CMS plans to expand the esMD system to allow providers to submit discussion requests, in PDF format, to recovery auditors starting in FY 2014.

- **Allow Providers to submit Structured Electronic Clinical Templates**
Currently, the esMD system only accepts unstructured (PDF) documents. However, CMS is planning to develop esMD standards for structured medical records. CMS has been working closely with the Office of the National Coordinator through the Standards and Interoperability Framework to develop these data elements. This enables suppliers, physicians, and electronic health record vendors to provide feedback on the PMD Electronic Clinical Template for possible nationwide use. As a pilot for this functionality, CMS is exploring the development of an Electronic Clinical Template that would allow electronic health record vendors to create prompts to assist physicians when documenting the medical necessity of a PMD.

    CMS is also exploring the development of an Electronic Clinical Template to assist physicians when documenting the medical necessity of lower limb prostheses (LLP). The first drafts of the data elements lists are available in the Download section of http://go.cms.gov/eclinicaltemplate.

Section A lists the HIHs that have been certified by CMS to offer CMS esMD services. (HIHs are listed in the order of when they were certified).

A: CMS Certified esMD Health Information Handlers
- ABILITY Network (formerly IVANS)
- RISARC
- HealthPort
- MRO
- NaviNet
- Health IT Plus
- ApeniMED, Inc.
- Cobius Healthcare Solutions
- eSolutions, Inc.

- IOD Incorporated
- Medial Electronic Attachment (MEA)
- The SSI Group
- Proficient Health
- Rycan Technologies, Inc.
- Craneware
- Verisk Health (formerly MediConnect)
- SunCoast RHIO
- LOISS, Ltd.
- MedFORCE Technologies
- Verisma Systems
- Bluemark, LLC
- Medical Records, LLC
- Dorado Systems
- Episode Alert

Section B lists the CMS-approved review contractors that accept esMD transactions as of September 2013.

B: CMS Review Contractors Accepting esMD Transactions
- Recovery Audit Contractors
  - Recovery Auditor Region A (DCS)
  - Recovery Auditor Region B (CGI)
  - Recovery Auditor Region C (Connolly)
  - Recovery Auditor Region D (Health Data Insights)

- A/B Medicare Administrative Contractors
  - Medicare Administrative Contractor Jurisdiction E (J1) (Palmetto)
  - Medicare Administrative Contractor Jurisdiction F (J2 & J3) (Noridian)
  - Medicare Administrative Contractor Jurisdiction 4 (Trailblazer)
  - Medicare Administrative Contractor Jurisdiction 5 (Wisconsin Physicians Services)
  - Medicare Administrative Contractor Jurisdiction 6 (Legacy Title 18) (National Government Services)
  - Medicare Administrative Contractor Jurisdiction 8 (Wisconsin Physicians Services)
  - Medicare Administrative Contractor Jurisdiction 9 (First Coast)
  - Medicare Administrative Contractor Jurisdiction 10 (Cahaba)
  - Medicare Administrative Contractor Jurisdiction 11 (Palmetto) Medicare Administrative Contractor Jurisdiction L (J12) (Novitas Solutions)
  - Medicare Administrative Contractor Jurisdiction K (J13) (National Government Services)
  - Medicare Administrative Contractor Jurisdiction K (J14) (NHIC)
  - Medicare Administrative Contractor Jurisdiction 15 (CGS)
  - Medicare Administrative Contractor Jurisdiction H (Novitas Solutions)

- Durable Medical Equipment Medicare Administrative Contractors
  - Jurisdiction A (NHIC)
  - Jurisdiction B (National Government Services)
  - Jurisdiction C (CGS)
  - Jurisdiction D (Noridian)

- Error Rate Measurement Contractors
  - Comprehensive Error Rate Testing Contractor (Livanta)
  - Payment Error Rate Measurement (A+ Government Solutions)

- Zone Program Integrity Contractors
  - Zone 1 (SafeGuard Services)
  - Zone 3 (Cahaba)
  - Zone 7 (SafeGuard Services)

- Supplemental Medical Review Contractor
  - Strategic Health Solutions

Updated lists of CMS-approved review contractors and CMS-certified HIHs can be found at www.cms.gov/esMD