

August



## Introducing Electronic Submission of Medical Documentation (esMD) To HIHs

### **JOYCE DAVIS**

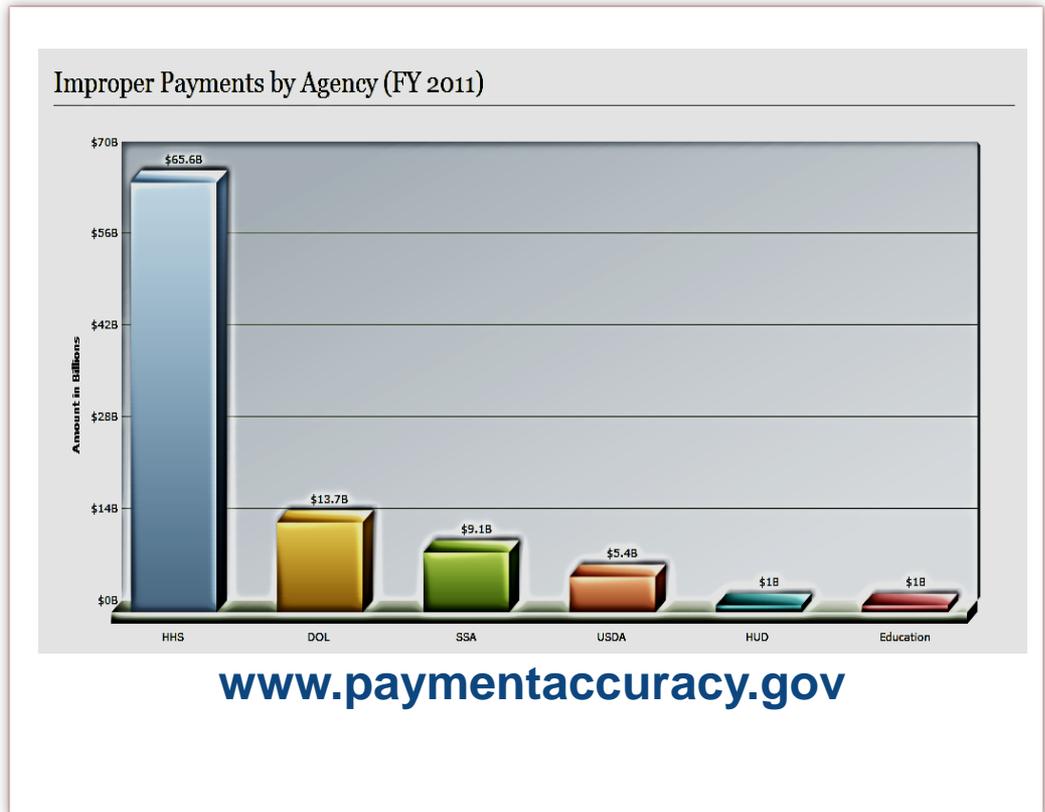
Health Insurance Specialist,  
CMS / OFM / Provider Compliance Group

### **LAURA HIGDON**

Technical Writer,  
QSSI-esMD Project

# Improper Payments

- Medicare receives **4.8 M** claims per day.
- CMS' Office of Financial Management estimates that each year
  - the Medicare FFS program issues more than **\$28.8 B** in improper payments (error rate 2011: **8.6%**).
  - the Medicaid FFS program issues more than **\$21.9 B** in improper payments (3-year rolling error rate: **8.1%**).
- Most improper payments can only be detected by a **human** comparing:
  - a **claim** to
  - the **medical documentation**.



# Background Facts about Medical Documentation Requests

## ➤ Medical Documentation Requests are sent by:

- Medicare Administrative Contractors (MACs) Medical Review (MR) Departments
- Comprehensive Error Rate Testing Contractor (CERT)
- Payment Error Rate Measurement Contractor (PERM)
- Medicare Recovery Auditors (formerly called RACs)

➤ Claim review contractors issue over **1 million** requests for medical documentation each year.

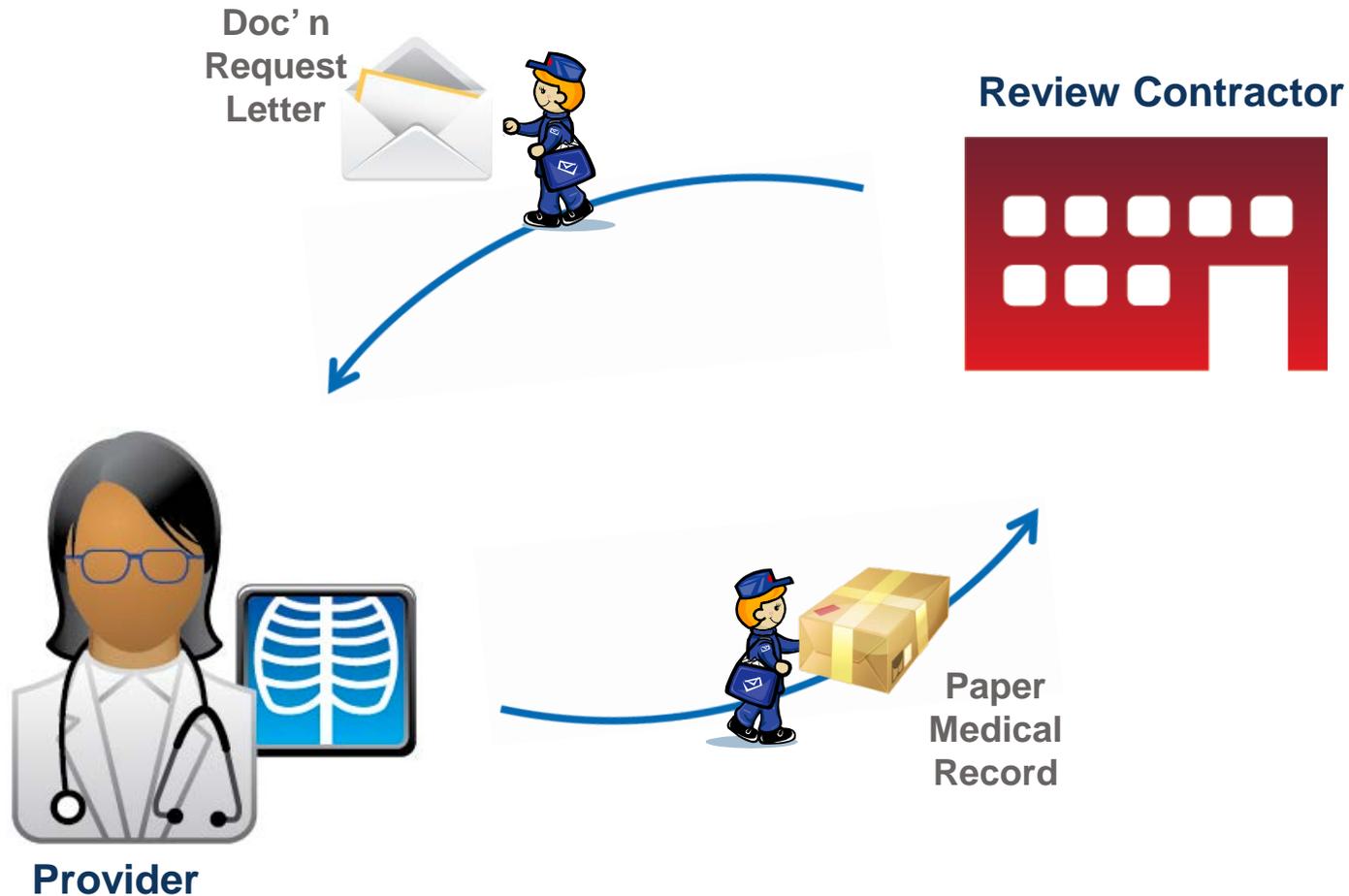
➤ Claim review contractors currently receive most medical documentation in **paper** form or via fax.

These contractors are overseen by OFM/PCG

- **George Mills,** Director
- **Melanie Combs-Dyer,** Deputy Director

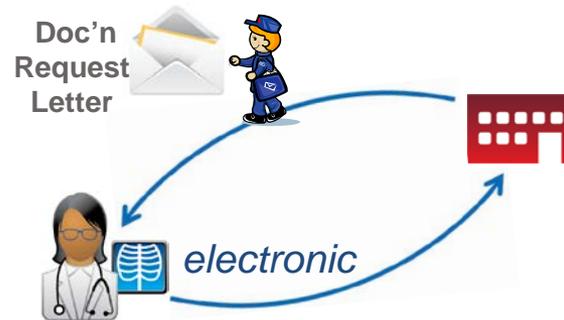
Medical documentation request are also sent by:	Overseen by:
MAC Cost Report Audit Departments	OFM/FSG
Coordination of Benefit Contractor	OFM/FSG
HITECH Auditor	OFM/FSG
QIOs	OCSQ
QICs	CM

# Today's Paper Medical Documentation Process



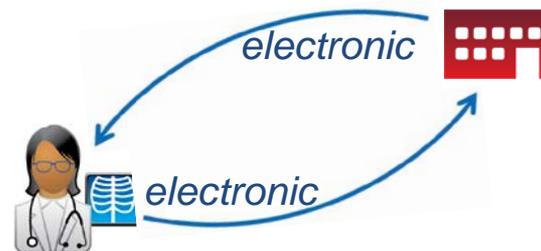
# The Solution: Electronic Submission of Medical Documentation (esMD)

## Phase 1:



**Approved by TRB**  
(Went live Sept 15, 2011)

## Phase 2:



**Being Planned for 2013**

# esMD is NOT Mandatory for Providers

CMS recognizes that not all providers are adopting HIT solutions at the same pace.

## HIT Adoption Rate

### Late Adopter

- Still using paper records.
- Intends to rely on fax machines, USPS, FedEx, etc. for the for the next 10 years.

### Average Adopter

- Using imaged & electronic records.
- Will wait to see which esMD Service Providers emerge in their area (and at what price).

### Early Adopter

- Has used EHRs for years.
- Ready for esMD now!

***Review contractors cannot target providers for medical review just because they use esMD, CMS Program Integrity Manual Chapter 3, Section 3.2.1.***

# Providers Who Want to Submit Via esMD

## STEP 1:

Find out if your Review Contractors accept esMD

## STEP 2:

Obtain access to an esMD “gateway”

# Step 1: CMS Review Contractors that Accept esMD

Approved CMS Review Contractors
Region A Medicare Recovery Auditor (DCS)
Region B Medicare Recovery Auditor (CGI)
Region C Medicare Recovery Auditor (Connolly)
Region D Medicare Recovery Auditor (HDI)
Medicare Administrative J1 (Palmetto GBA)
Medicare Administrative JF (Noridian)
Medicare Administrative J4 (Trailblazer)
Medicare Administrative J5 (WPS)
Medicare Administrative J9 (First Coast)
Medicare Administrative J10 (Cahaba)
Medicare Administrative J11 (Palmetto)
Medicare Administrative J12 (Novitas Solutions)
Medicare Administrative J13 (NGS)
Medicare Administrative J14 (NHIC)
Medicare Administrative J15 (CGS)
DME Medicare Administrative JA (NHIC)
DME Medicare Administrative JB (NGS)
DME Medicare Administrative JC (CGS)
DME Medicare Administrative JD (Noridian)
Comprehensive Error Rate Testing (CERT)
Program Error Rate Measurement (PERM)

## Planning for Summer 2012

Medicare Administration J8 (WPS)

Medicare Administration JH (Novitas Solutions)

## Planning for Fall/Winter 2012

Legacy Contractor Title 18 J6 (NGS)

## Planning for Phase 2 of esMD

ZPIC Zone 1 (SGS)

ZPIC Zone 7 (SGS)

Medicare Administrative J2 and J3 have merged to become JF (Noridian)  
For updated list, visit to: [www.cms.gov/esMD](http://www.cms.gov/esMD)

# The Nationwide Health Information Network

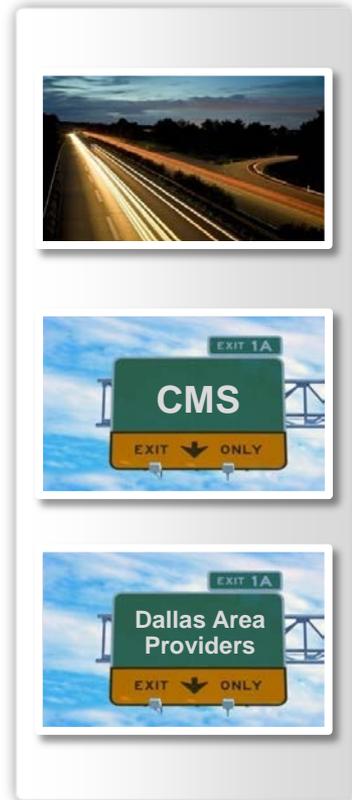
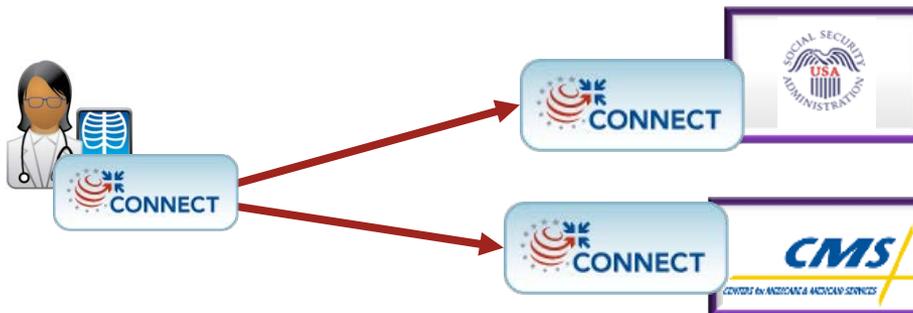
- is a set of **standards, protocols, legal agreements, and specifications** that a consortium of health information organizations have agreed are necessary for **secure and private** exchange of health information over the public internet.
- is overseen by the Office of the National Coordinator for Health IT (ONC)
- is comprised of two parts:
  - **Direct** – designed for an individual to individual submission of health information <http://wiki.directproject.org/>
  - **Exchange** – designed for computer to computer exchange of health information  
[http://healthit.hhs.gov/portal/server.pt?open=512&objID=1407&parentname=CommunityPage&parentid=8&mode=2&in\\_hi\\_userid=11113&cached=true](http://healthit.hhs.gov/portal/server.pt?open=512&objID=1407&parentname=CommunityPage&parentid=8&mode=2&in_hi_userid=11113&cached=true)

CMS Gateway uses  
this NHIN standard

esMD transactions are SAFE and SECURE because  
the esMD system uses **NHIN standards**

# CMS esMD Gateway

- CMS has built an Exchange Gateway to accept esMD transactions from providers.
- The CMS esMD Gateway went live September 15, 2011!
  - ✓ HealthPort sent the first esMD submission on 9/21/11
- CMS uses the “CONNECT” brand of gateway

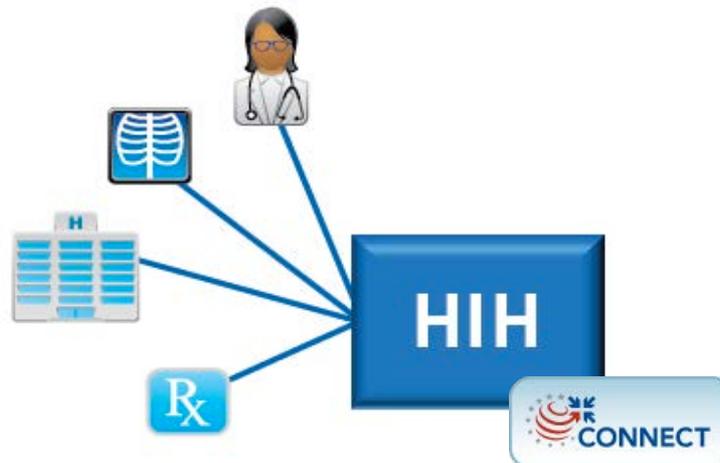


# How Can Providers Obtain Access to a Gateway?

- Providers can build their own gateway



- Providers can contract with a Health Information Handler (HIH)



# Most Providers Won't Build Their Own Gateway But Will Use an HIH to Provide Gateway Services

A Health Information Handler (HIH) is any company that handles health information on behalf of a provider. Examples include:

**(1) Health Information Exchange (HIE)/Regional Health Information Organization (RHIO)**

**(2) Release of Information (ROI) Vendor**

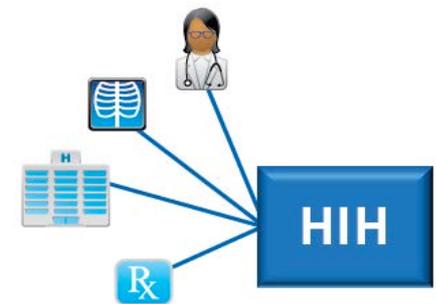
A company that manages the release of information for providers. Their services may include logging and tracking the request, retrieving the patient record from multiple locations in multiple formats, identifying the information needed to fulfill the request, requesting additional authorization, if needed, copying, packaging and mailing, and invoicing.

**(3) Electronic Health Record (EHR) Vendor**

**(4) Claim Clearinghouse**

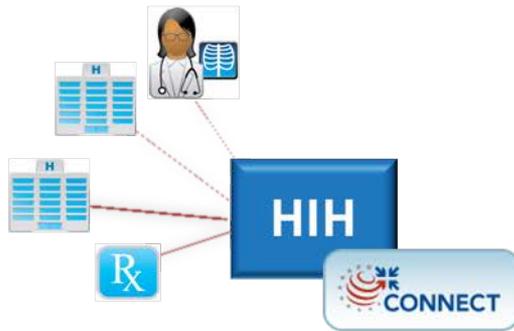
**(5) Health Internet Service Provider (HISP)**

An entity that provides services that enable providers or health organizations to exchange health information using the internet.

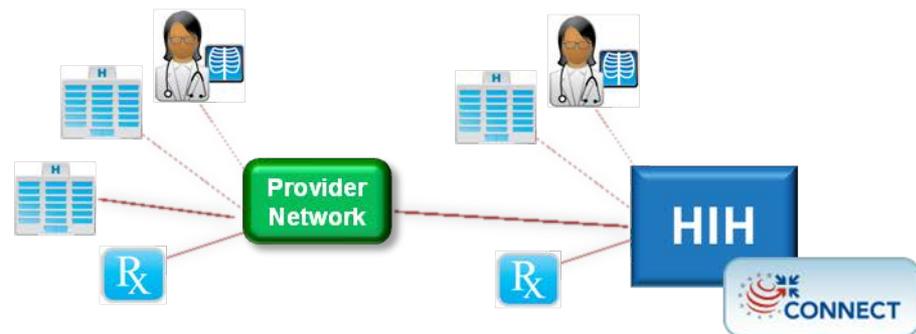


# esMD is Open to Providers and Provider Networks:

- May communicate directly with providers, or



- May communicate through entities who have formed a provider network



## Step 2: CMS-Certified HIHs That Offer esMD “Gateway” Services

<b>CMS Certified esMD HIHs</b>
<b>IVANS</b>
<b>MRO</b>
<b>RISARC</b>
<b>NaviNet</b>
<b>HealthPort</b>
<b>Health IT</b>
<b>ApeniMED Inc.</b>
<b>Cobius Healthcare Solutions</b>
<b>eSolutions, Inc.</b>
<b>IOD Incorporated</b>
<b>Medical Electronic Attachment (MEA)</b>
<b>The SSI Group</b>
<b>Proficient Health</b>
<b>Rycan Technologies, Inc.</b>
<b>Craneware Insight</b>

<b>HIHs under Certification Process to Offer esMD Services</b>
<b>MediConnect</b>
<b>Verisma Systems</b>
<b>One Source Document Management</b>
<b>H&amp;H Medical Records, LLC</b>
<b>LOISS</b>
<b>MedFORCE Technologies</b>
<b>SunCoast RHIO, Inc.</b>
<b>MDclick</b>

- Note: Are not funded by CMS or ONC
- For an updated list, visit: [www.cms.gov/esMD](http://www.cms.gov/esMD)

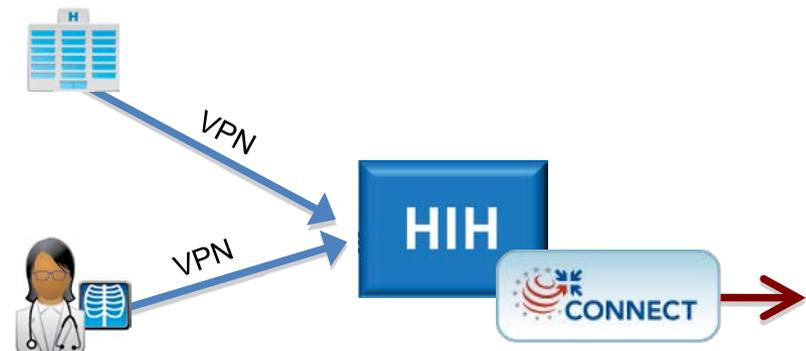
# Where Will HIHs Offer esMD Services?

Company	CMS Certification Date	MAC J1	MAC J3	MAC J4	MAC J5	MAC J9	MAC J10	MAC J11	MACJ12	MAC J13	MAC J14
		(CA, NV, HI)	(AZ, MT, ND, SD, UT, WY)	(CO, NM, OK, TX)	(NE, KS, IA, MO)	(FL, PR, VI)	(AL, GA, TN)	(NC, SC, VA, WV)	(DE, DC, MD, NJ, PA)	(CT, NY)	(ME, MA, NH, RI, VT)
HealthPort	9/15/2011	X	X	X	X	X	X	X	X	X	X
IVANS	9/15/2011	X	X	X	X	X	X	X	X	X	X
RISARC	9/29/2011	X	X	X	X	X		X	X	X	X
NaviNet	9/29/2011	X	X	X	X	X	X	X	X	X	X
MRO	10/21/2011	X	X	X	X	X	X	X	X	X	X
Health IT+	11/22/2011	X	X	X	X	X	X	X	X	X	X
eSolutions	1/20/2012	X	X	X	X	X	X	X	X	X	X
MEA	1/20/2012	X	X	X	X	X	X			X	
ApeniMED	1/25/2012	X			X						
IOD	1/27/2012	X	X	X	X	X			X	X	X
Cobius	2/01/2012	X	X	X	X	X	X		X	X	X
SSI Group	5/18/2012			X	X	X	X			X	
Proficient Health	5/22/2012			X		X	X	X	X	X	X
Rycan	7/18/2012	X									
Craneware Insight	8/07/2012	X	X		X		X	X		X	X

# CMS Does Not Dictate How an HIE Communicates with Providers

➤ Some esMD HIEs plan to ingest a provider's medical records and metadata by:

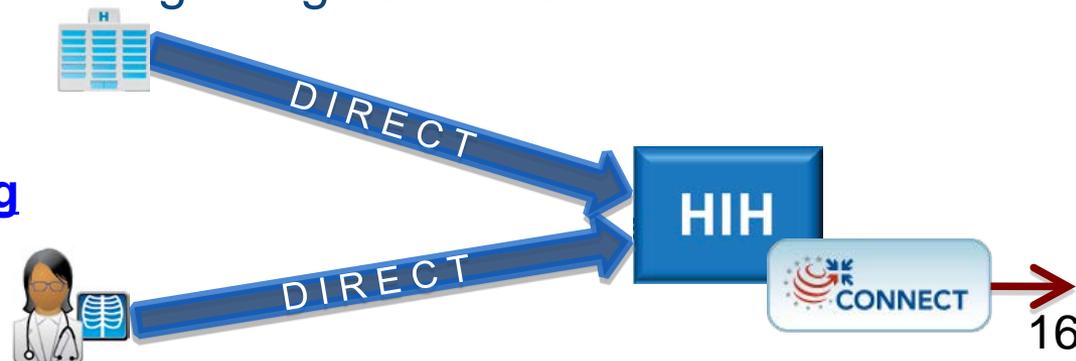
- going onsite to the provider's facility
- using a Virtual Private Network (VPN)
- using a secure web portal



➤ Some esMD HIEs are considering using DIRECT.

<http://directproject.org>

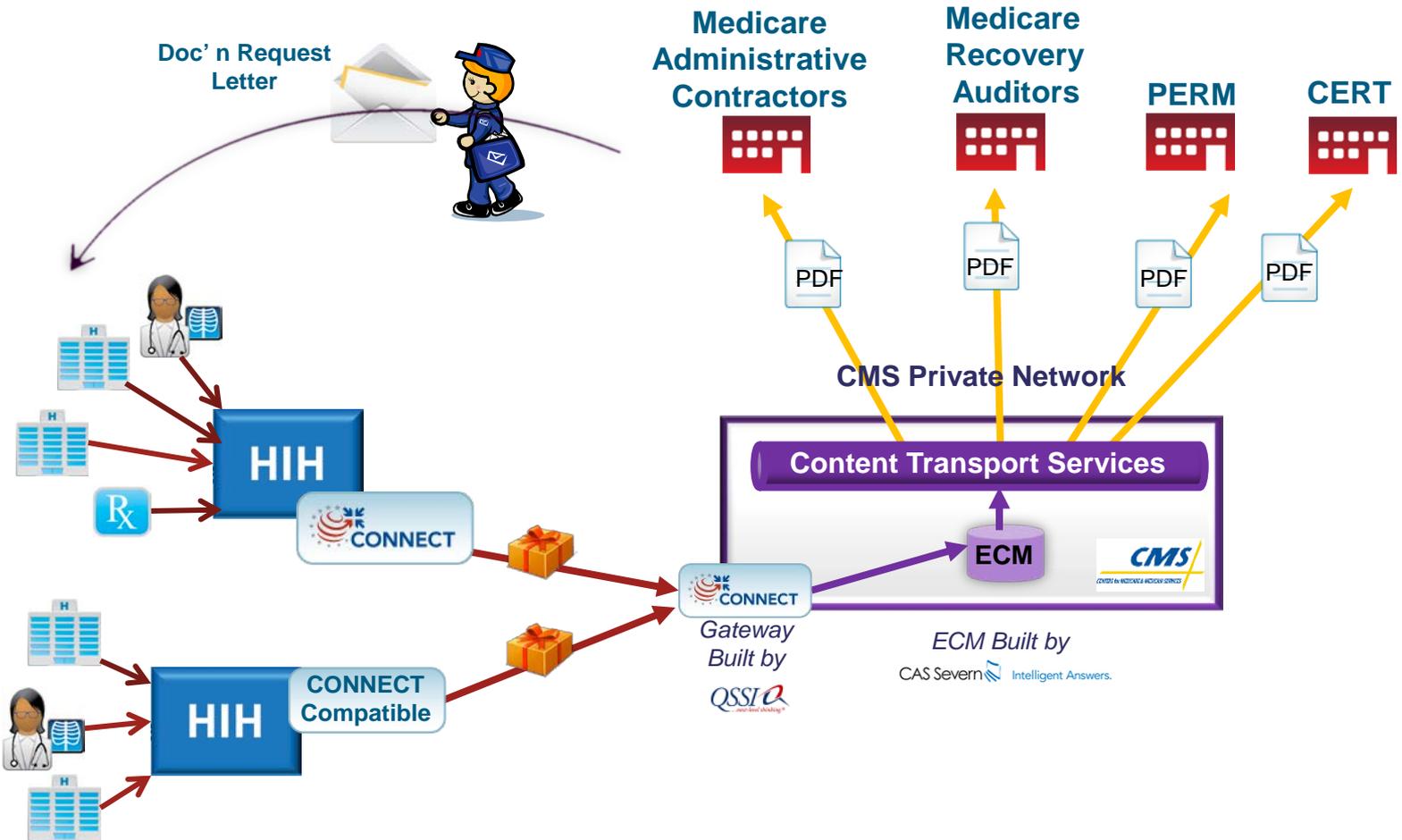
<http://wiki.directproject.org>



# esMD HIHs:

- Will receive no funding from CMS or ONC (Note: they may bill providers)
- Attend calls with CMS (scheduled)
- Build a CONNECT-Compatible Gateway
- Obtain a certificate, IP address, and share key with CMS Gateway Contractor
- Test with CMS Gateway Contractor
- Recruit providers to join
- “On-Board” to the Nationwide Health Information Network (April 2013)
  - Sign Legal agreements (DURSAAs)
  - Test with ONC Gateway Team

# esMD Phase 1: September 2011



# Definition of an esMD Package



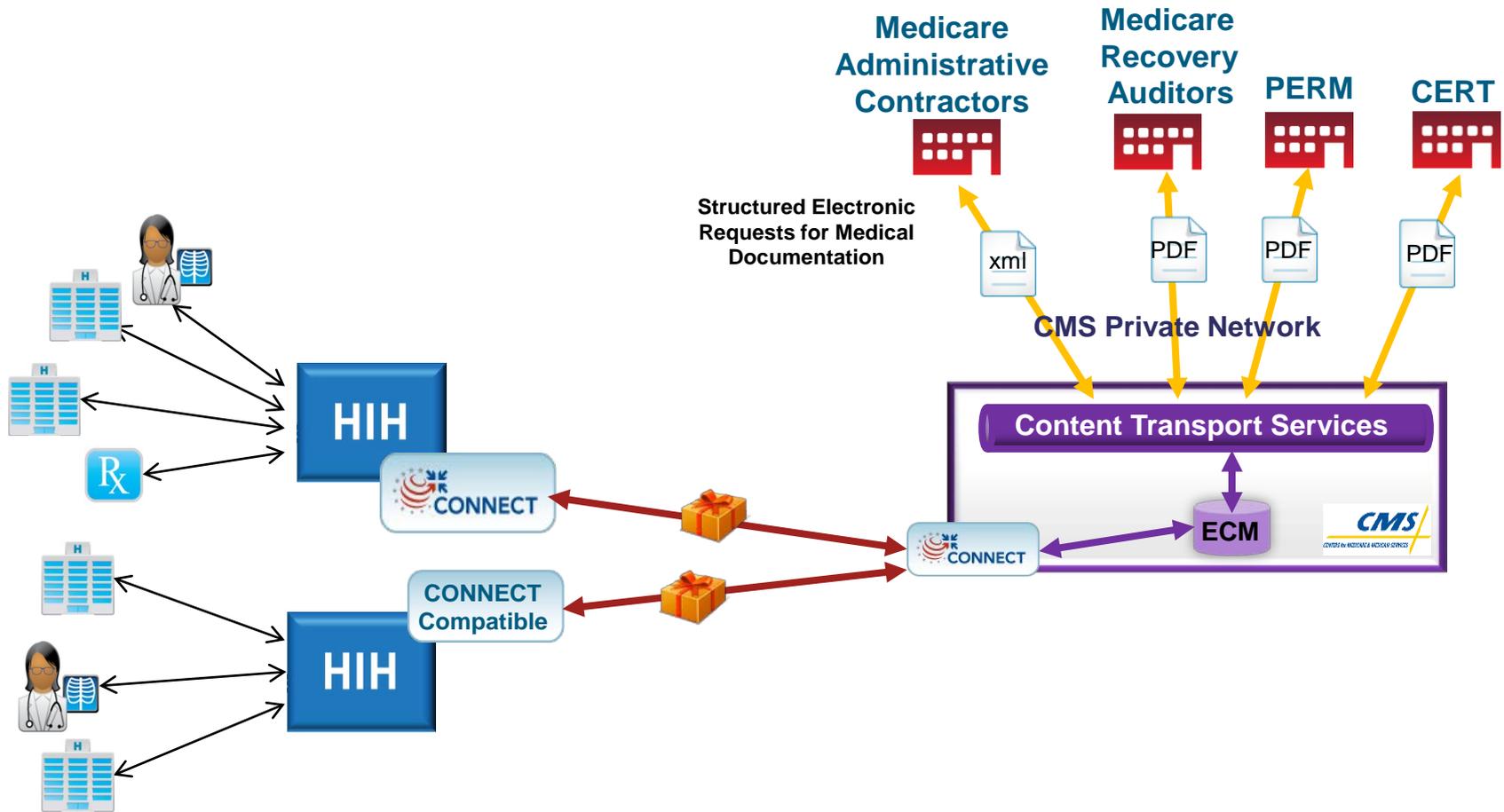
**A portion of a patient's medical record in esMD format which will contain:**

- Imaged documents (PDF)
  - Important Metadata Fields:
    - Intended Recipient – Required Field
    - Claim ID – Required Field
    - NPI – Required Field
    - Case ID – Required If Known
    - Document Type Code – Required
- We are here** ➤
- Response to Additional Documentation Request (PDF)
  - Appeal Request (PDF)
  - Unsolicited Claim Attachment Paperwork, a.k.a. "PWK"
  - ADMC (prior authorization) Requests (PDF)

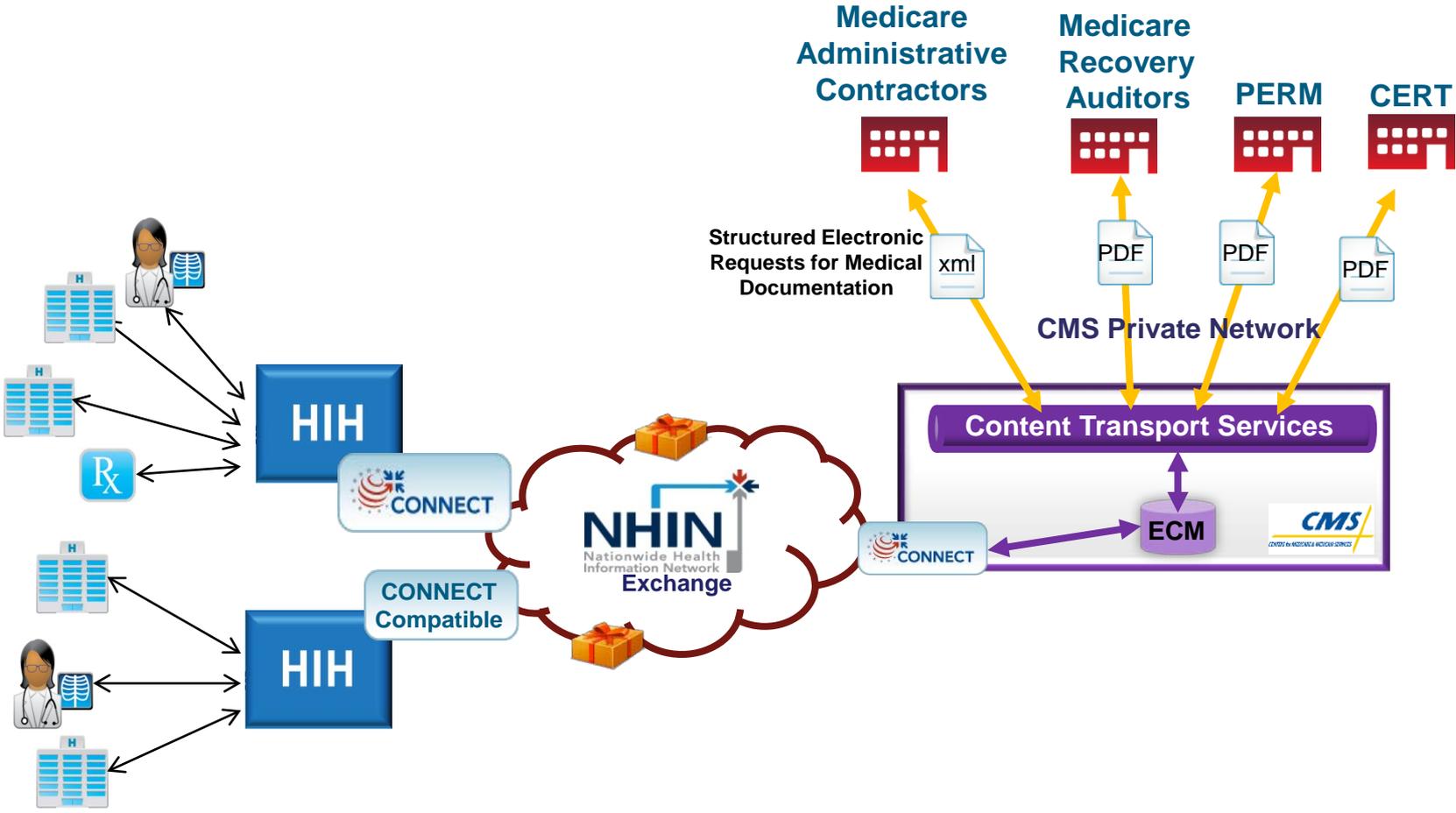
**Detailed description for each field can be found in:**

- the esMD XDR Profile. (<http://www.connectopensource.org/product/connect-NHIN-specs>)
- the esMD Implementation Guide. ([www.cms.gov/esMD](http://www.cms.gov/esMD))

# esMD Phase 2: Future Release



# esMD in Phase 2: Future Release



# Current and Future Use Cases for esMD

## INBOUND (esMD Phase 1)

- Responses to Documentation Request Letters in PDF
- Appeal Requests in PDF
- Unsolicited Documentation in PDF (called paperwork or “PWK”)
- Structured Orders, Progress Notes, ADMC Requests
- Structured esMD Phase 2 Registration
- Etc.



We Are Here

## OUTBOUND (esMD Phase 2)

- Structured Outbound Documentation Requests
- Review Results Letters
- Demand Letters
- Etc.

## LOOKUP (future phase)

- Request\Receive Documentation Status
- Request\Receive Claim Status
- Request\Receive Appeals Status
- Request\Receive Eligibility Info
- Etc.

# Providers Signed up with an esMD HIH

## ➤ In August 2012 (estimates):

- 2,713 Part A providers
- 23,649 Part B providers



## ➤ In September 2012 (estimates):

- 8,476 Part A providers
- 44,389 Part B providers



Note: Not every provider who is signed up with an esMD HIH receives a documentation request. Thus, these statistics are not a measure of the number of transactions that have been submitted through the gateway.

# Want to Become an esMD HIH?

- **Visit** <http://www.qssinc.com/esmd/index.html>
- **Visit** <http://www.cms.gov/esMD>

# Want to be an esMD HIH but don't know how to build a gateway?

- Consider contacting the esMD HIHs.
- Consider contacting one of the esMD HIH subcontractors.  
[http://www.cms.gov/ESMD/04\\_b\\_IT\\_Vendors\\_Assisting\\_HIHs.asp#TopOfPage](http://www.cms.gov/ESMD/04_b_IT_Vendors_Assisting_HIHs.asp#TopOfPage)
- Consider contacting one of the IT vendors listed on  
[http://www.connectopensource.org/partners.](http://www.connectopensource.org/partners)

# For More Information

To contact anyone on the esMD Team:

[esMDTeam@qssinc.com](mailto:esMDTeam@qssinc.com)

CMS esMD Website:

[www.cms.gov/esMD](http://www.cms.gov/esMD)

CONNECT Website:

<http://www.connectopensource.org>

Follow Us on Twitter:

**@CMSGov (Look for #CMS\_esMD)**

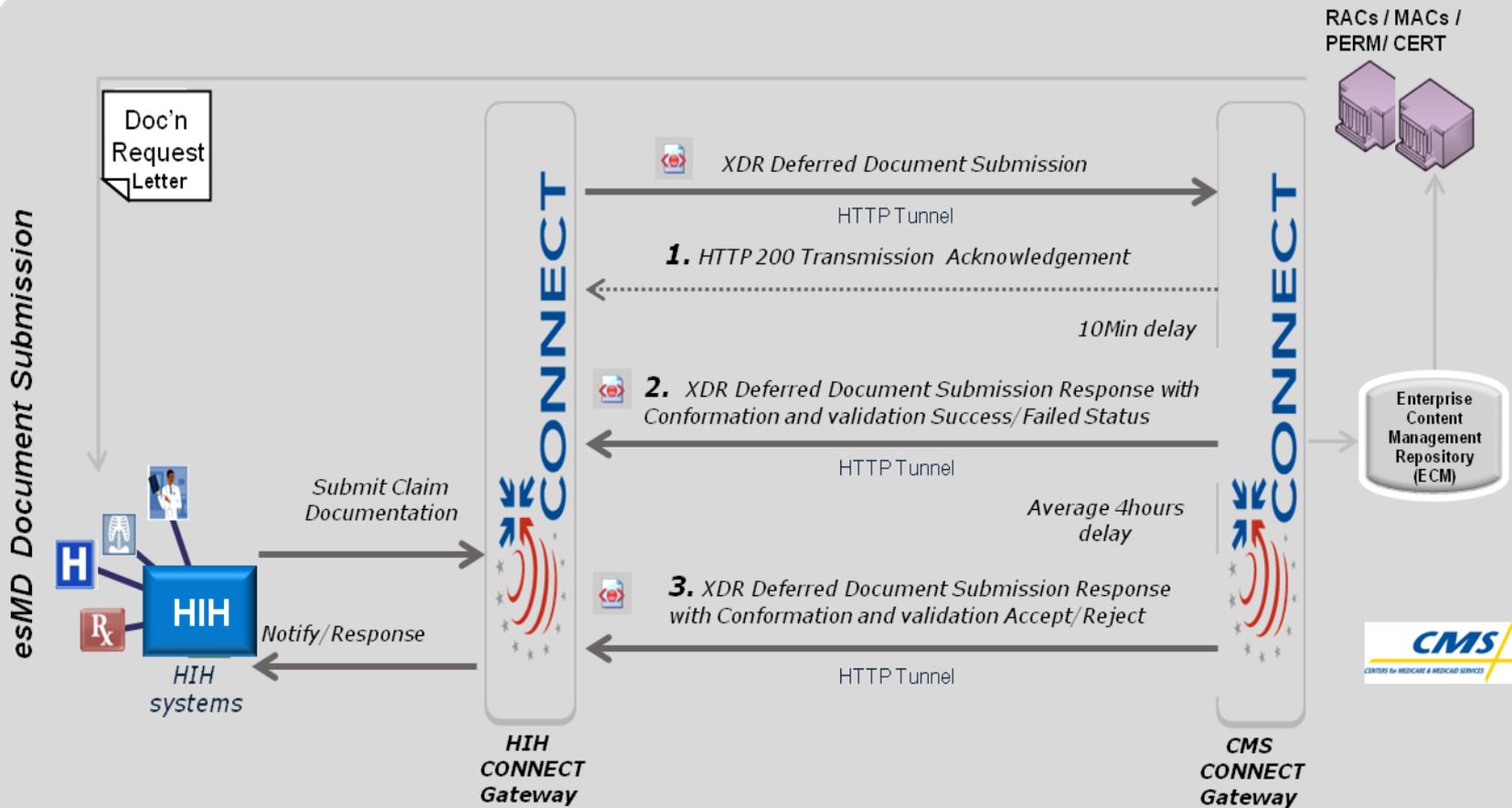
# Questions From the Audience



# esMD Technical Documents for HIHs and IT Vendors

	esMD XDR Profile Definition	esMD XDR Implementation Guide	esMD X12 Profile Definition	esMD X12 Implementation Guide
Location of Document	<a href="http://www.connectopensource.org/product/connect-NHIN-specs">http://www.connectopensource.org/product/connect-NHIN-specs</a>	<a href="http://www.cms.gov/esMD">www.cms.gov/esMD</a>	Draft currently available at <a href="http://NHIN-exchange.wikispaces.com/CMS+esMD">http://NHIN-exchange.wikispaces.com/CMS+esMD</a> ;  Draft soon available on <a href="http://www.connectopensource.org/product/connect-NHIN-specs">http://www.connectopensource.org/product/connect-NHIN-specs</a>	Draft soon available on <a href="http://www.cms.gov/esMD">www.cms.gov/esMD</a>
CONNECT transport support	XDR interchange Module in <b>CONNECT v3.1</b>		X12 Interchange support in CONNECT v. 3.x	
Payloads Accepted	Initially, will accept HITSP C-62 unstructured documents in XDR interchange		Initially, will accept HITSP C-62 unstructured documents in ASC x12 275 EDI interchange	
Date HIHs Can Begin Submitting	esMD XDR Go Live Date was September 2011		X12 esMD Go Live Date expected April 2012	

# Acknowledgements and Notifications



# Standards Conversion

## XDR - SOAP Envelope

