November

Electronic Submission of Medical Documentation

Introducing Electronic Submission of Medical Documentation (esMD) To HIHs

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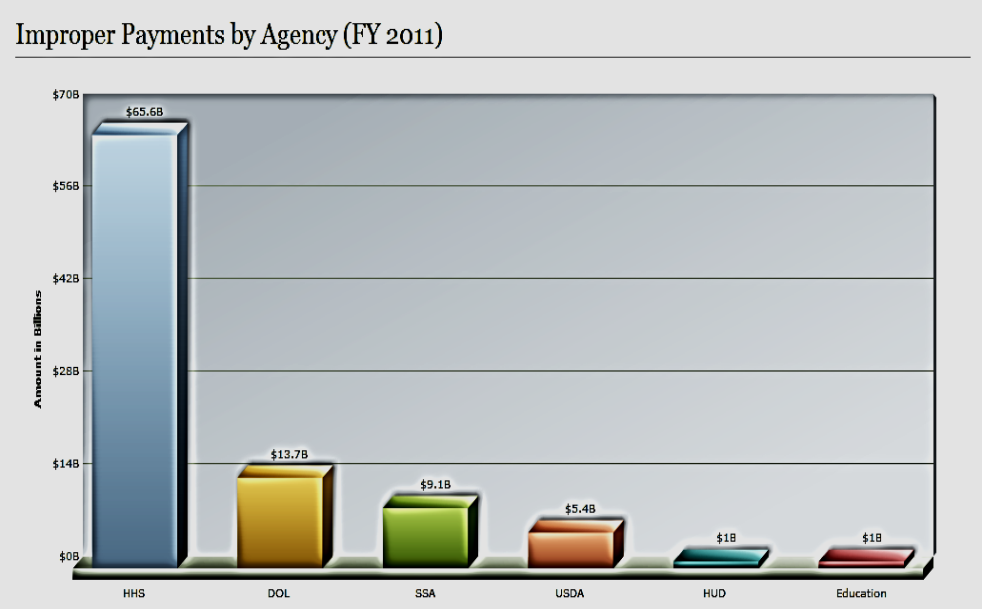
Improper Payments

- Medicare receives **4.8 M** claims per day.
- CMS' Office of Financial Management estimates that <u>each year</u>
  - 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.**



www.paymentaccuracy.gov

Background Facts about Medical Documentation Requests

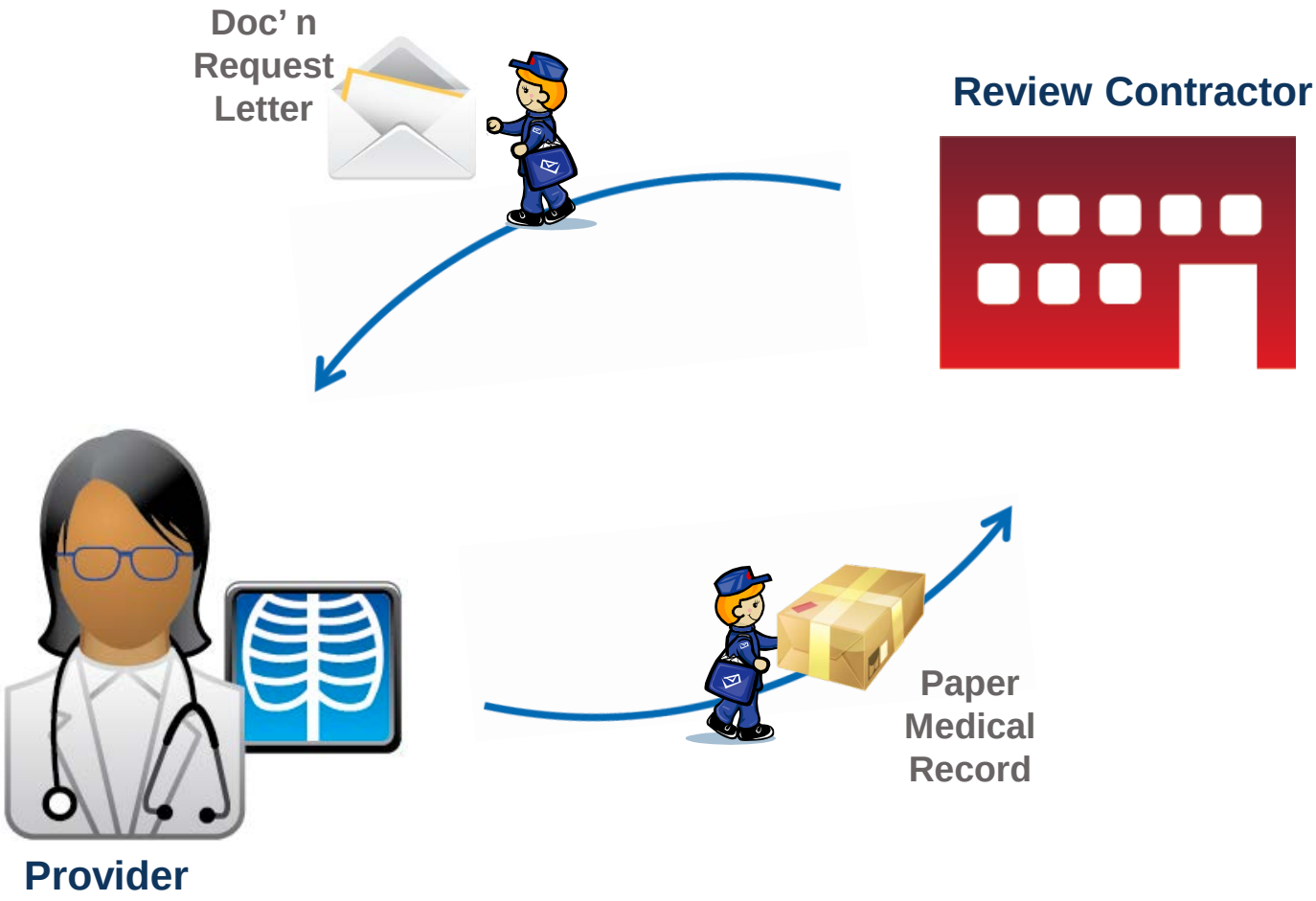
- **Medical Documentation Requests are sent by**:
  - Medicare Administrative Contractors (MACs) Medical Review (MR) Departments
  - Comprehensive Error Rate Testing Contractor (CERT)
  - Payment Error Rate Measurement Contractor (PERM)
  - Medicare Recovery Auditors (formerly called RACs)

These contractors are overseen by OFM/PCG
- **George Mills,** Director
- **Melanie Combs-Dyer,** Deputy Director

- 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.

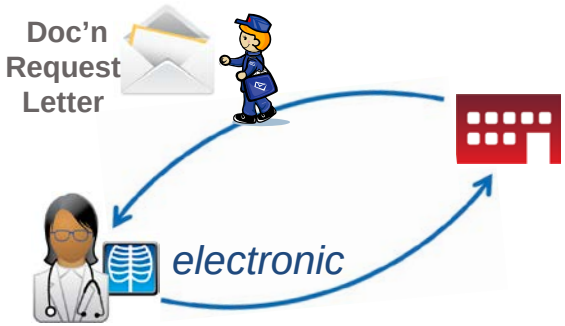
Medical documentation request are also sent by:	Overseen by:
MAC Cost Report Audit Departments	OFM/FSG
Coordination of Benefit Contractor	OFM/FSG
HITECH Auditor	OFM/FSG
QIOs	OCSQ
QICs	CM

Pre-esMD Paper Medical Documentation Process



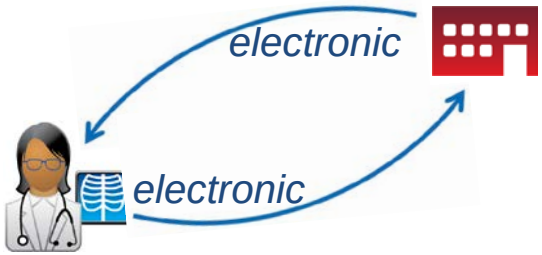
The Solution: Electronic Submission of Medical Documentation (esMD)

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 Administration JH (Novitas Solutions)*
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 Fall/Winter 2012
Medicare Administration J8 (WPS)
Legacy Contractor Title 18 J6 (NGS)

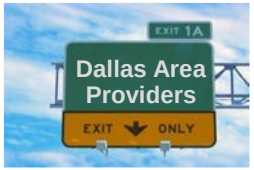
Planning for Phase 2 of esMD
ZPIC Zone 1 (SGS)
ZPIC Zone 7 (SGS)

For updated list, visit to: www.cms.gov/esMD.

*Merger of MAC J4 & J7 into MAC JH (Novitas Solutions).

The Nationwide Health Information Network

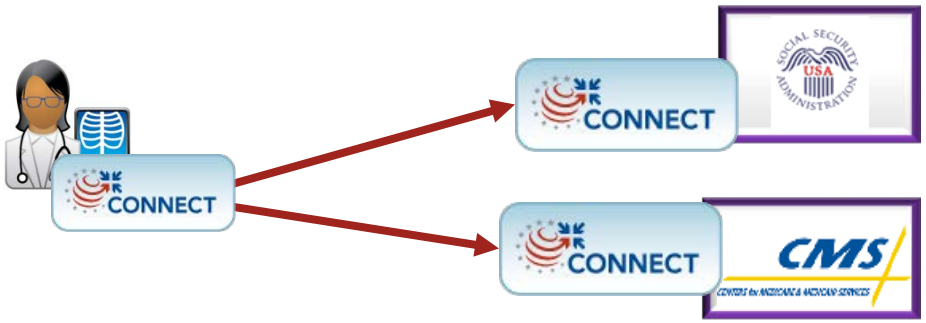
- Is a set of **standards, protocols, legal agreements, and specifications** that a consortium of health information organizations have agreed are necessary for **secure and private** exchange of health information over the public internet.
- Is overseen by the Office of the National Coordinator for Health IT (ONC)
- Includes a standard for a secure "Gateway
- Are not funded by CMS or ONC
- The CMS esMD Gateway went live September 15, 2011!

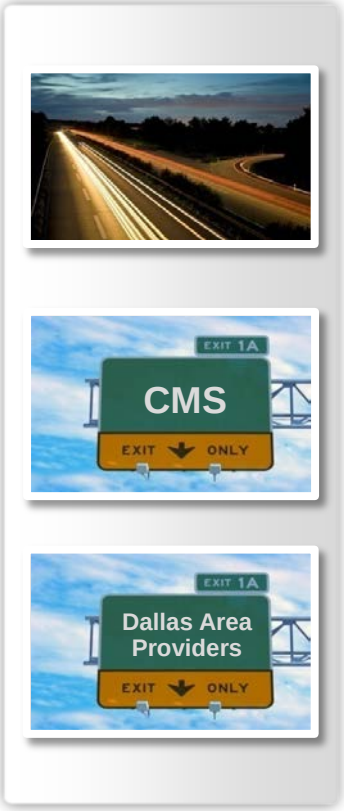


esMD transactions are SAFE and SECURE because the esMD system uses **NHIN standards**

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

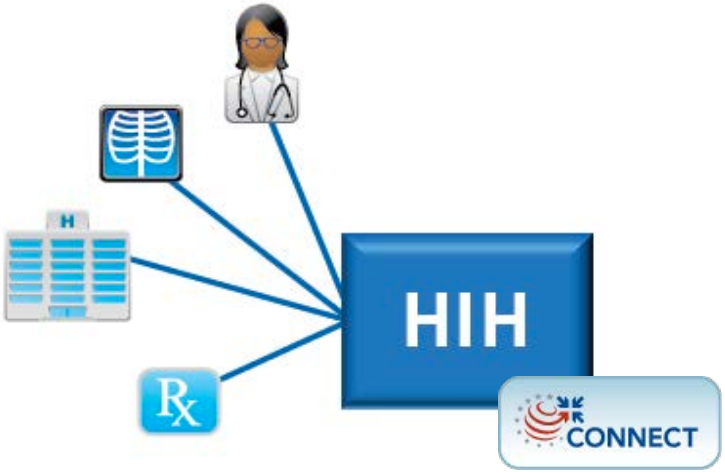




How Can Providers Obtain Access to a Gateway?

- **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:

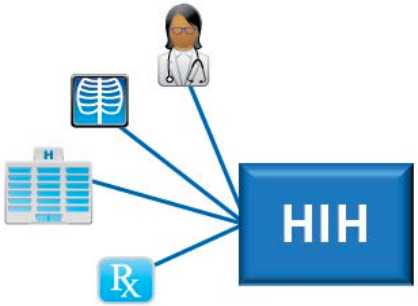
(1) Health Information Exchange (HIE)/Regional Health Information Organization (RHIO)

(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

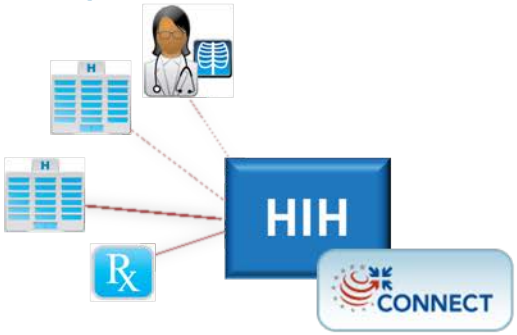
(4) Claim Clearinghouse

(5) Health Internet Service Provider (HISP)
An entity that provides services that enable providers or health organizations to exchange health information using the internet.

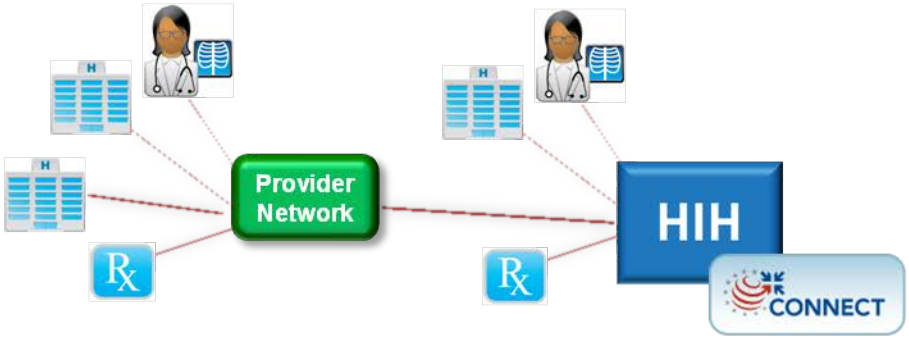


esMD is Open to Providers and Provider Networks:

- 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

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

HIHs under Certification Process to Offer esMD Services
One Source Document Management
H&H Medical Records, LLC
LOISS
MedFORCE Technologies
MDclick
AT&T
Bluemark
Dorado Systems
UPMC
Verisma Systems

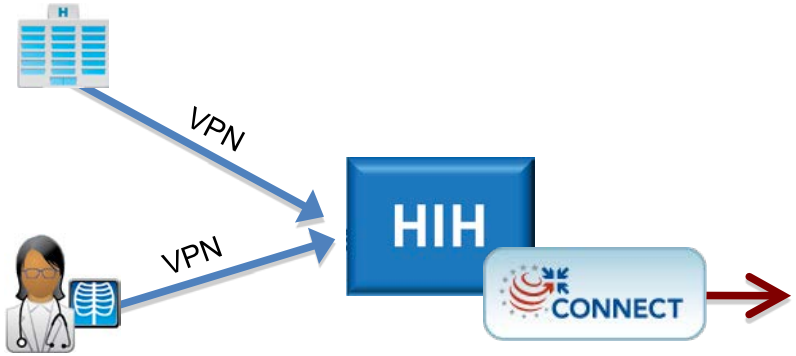
- Note: Are not funded by CMS or ONC
- For an updated list, visit: www.cms.gov/esMD

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	8/07/2012	X	X		X		X	X		X	X
MediConnect	8/31/2012	X	X	X	X	X	X	X	X	X	X
SunCoast RHIO	10/29/2012					X				X	

CMS Does Not Dictate How an HIH Communicates with Providers

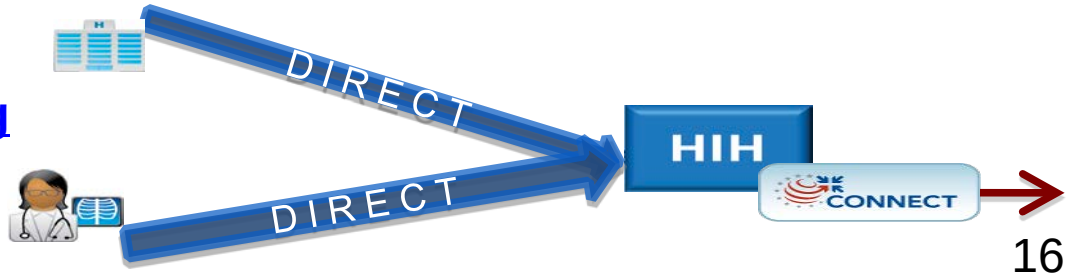
- Some esMD HIHs plan to ingest a provider's medical records and metadata by:
  - going onsite to the provider's facility
  - using a Virtual Private Network (VPN)
  - using a secure web portal



- Some esMD HIHs are considering using DIRECT.

  http://directproject.org

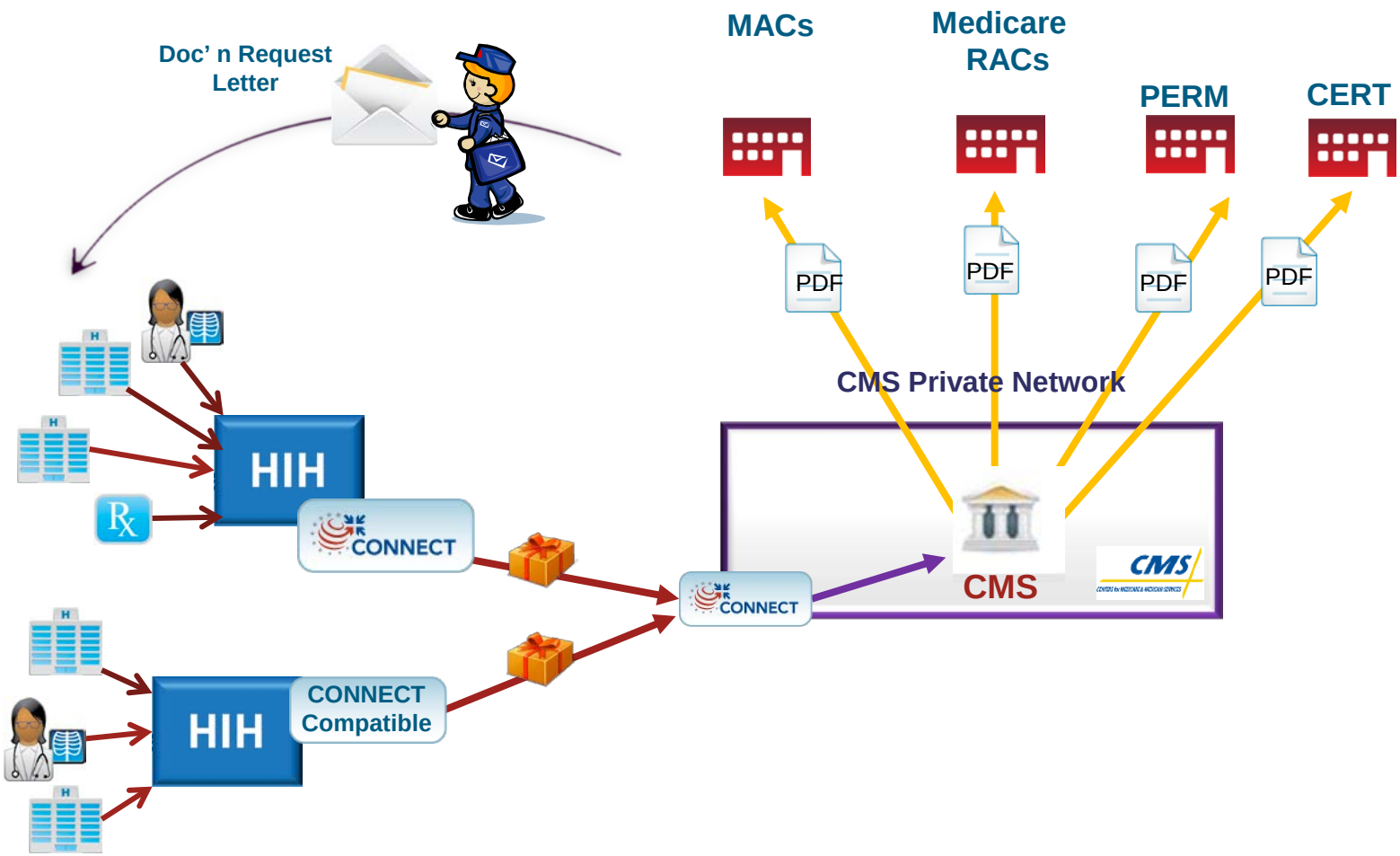
  http://wiki.directproject.org



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

esMD Phase 1: September 2011



Definition of an esMD Package

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

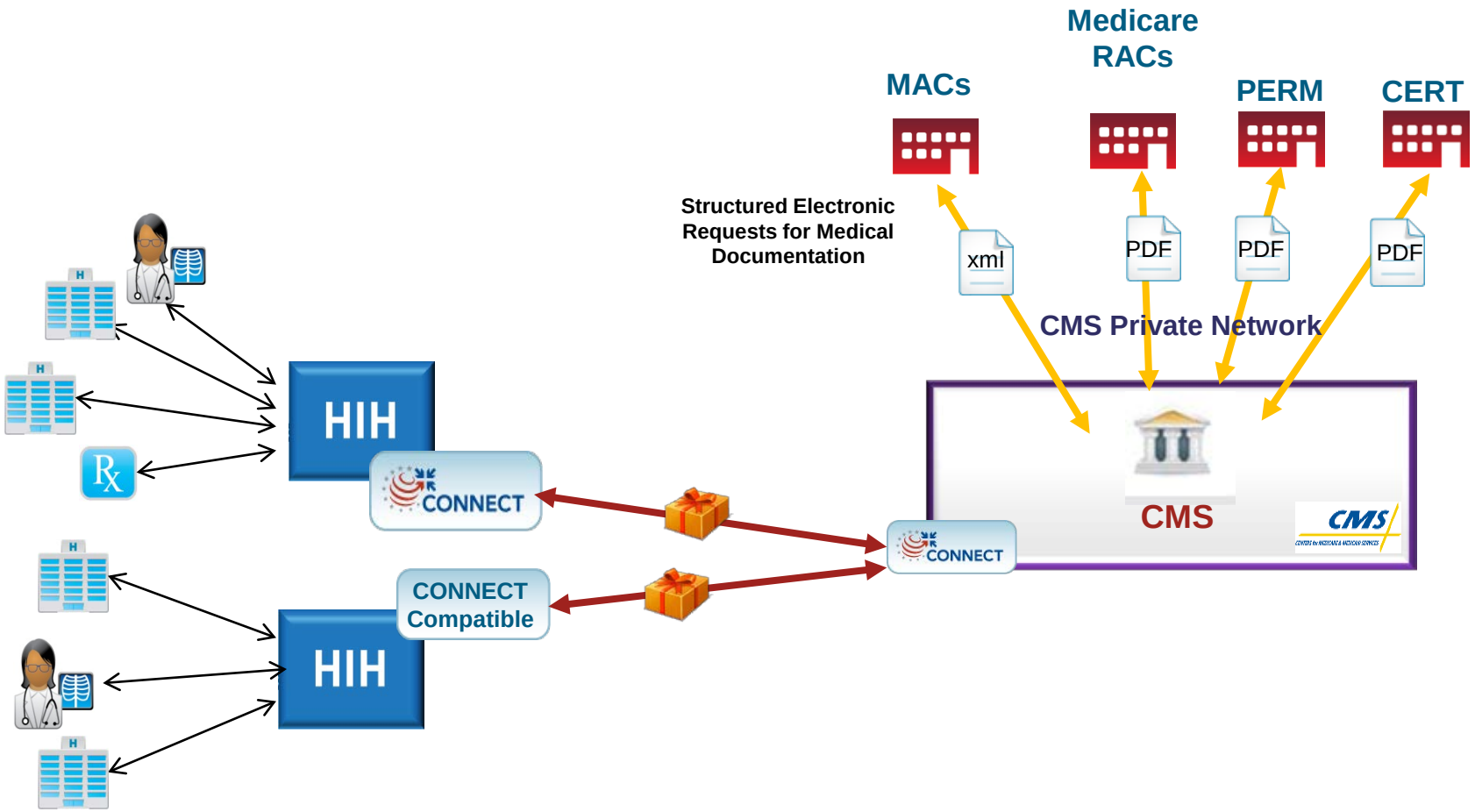
- Imaged documents (PDF)
- Important Metadata Fields:
  - Intended Recipient – Required Field
  - Claim ID – Required Field
  - NPI – Required Field
  - Case ID – Required If Known
  - Document Type Code – Required
    - Response to Additional Documentation Request (PDF)
    - ADMC (prior authorization)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

We are here

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)**

esMD Phase 2: Future Release



Current and Future Use Cases for esMD

INBOUND (esMD Phase 1)

- Responses to Documentation Request Letters in PDF
- ADMC Requests
- Unsolicited Documentation in PDF (called paperwork or "PWK")
- Appeal Requests in PDF
- Structured Orders, Progress Notes,
- 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

- **Unique Provider Count as of November 2012:**
  1,954

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**
- Consider contacting one of the IT vendors listed on **http://www.connectopensource.org/partners.**

For More Information

To contact anyone on the esMD Team:

esMDTeam@qssinc.com

CMS esMD Website:

www.cms.gov/esMD

CONNECT Website:

http://www.connectopensource.org

Follow Us on Twitter:

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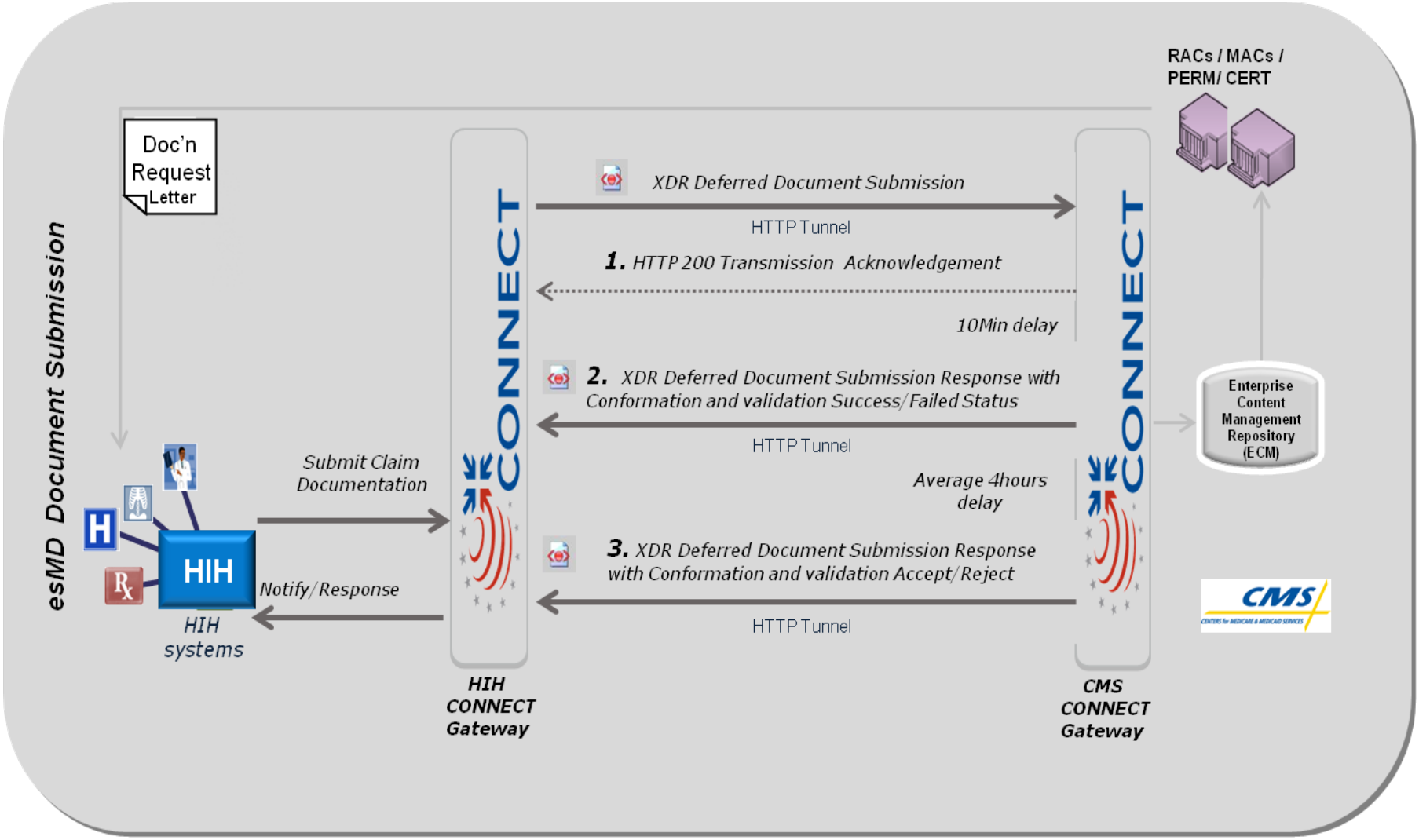
Questions From the Audience

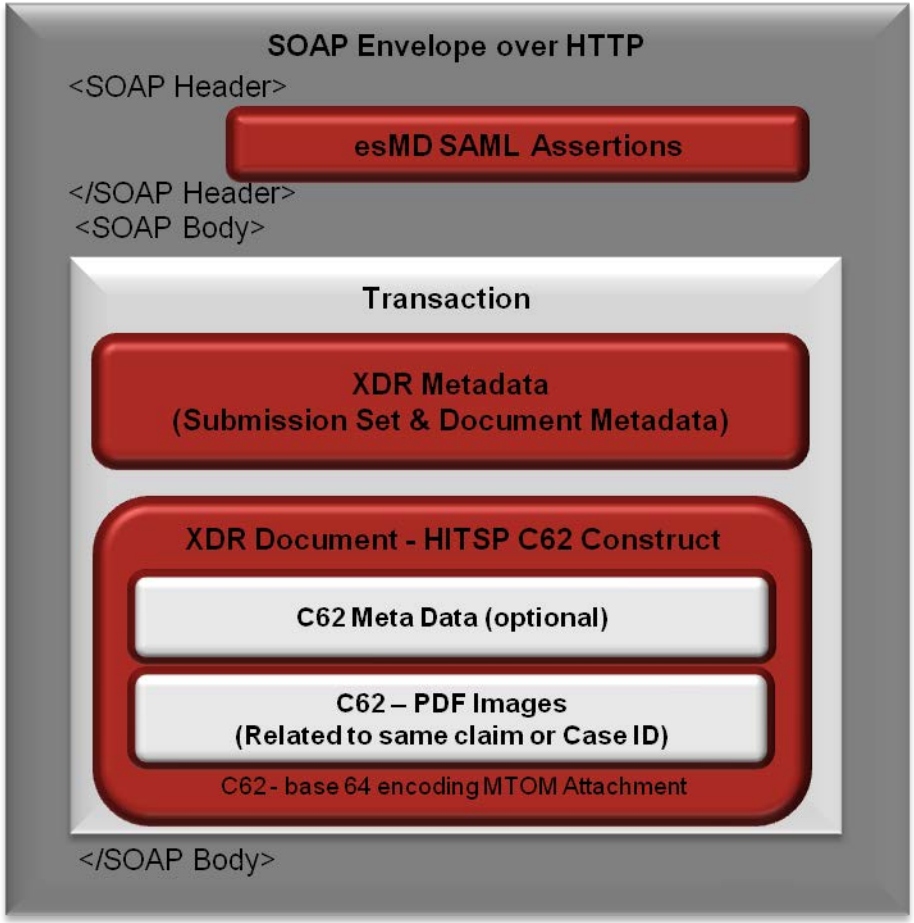
esMD Technical Documents for HIHs and IT Vendors

	esMD XDR Profile Definition	esMD XDR Implementation Guide	esMD X12 Profile Definition	esMD X12 Implementation Guide
Location of Document	http://www.connectopensource.org/product/connect-NHIN-specs	www.cms.gov/esMD	Draft currently available at http://NHIN-exchange.wikispaces.com/CMS+esMD; Draft soon available on http://www.connectopensource.org/product/connect-NHIN-specs	Draft soon available on www.cms.gov/esMD
CONNECT transport support	XDR interchange Module in CONNECT v3.1		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	

Electronic Submission of Medical Documentation

Acknowledgements and Notifications



Standards Conversion

XDR - SOAP Envelope