Role of the Nationwide Health Information Network in Streamlining CMS’ Medical Documentation Submission Processes

A Demonstration Using a CMS CONNECT Gateway

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CMS / OFM / Provider Compliance Group
Improper Payments

» CMS’ Office of Financial Management estimates that each year:
  - the Medicare FFS program issues more than $34.3 B in improper payments
  - the Medicaid FFS program issues more than $22.5 B in improper payments

» Most improper payments can only be detected by a human comparing:
  - a claim to
  - medical documentation

www.paymentaccuracy.gov
Background Facts about Medical Documentation Requests:

» Medical Documentation Requests are sent by:
  • MACs
  • CERT Contractor and PERM Contractor
  • RACs
  • ZPICs

» CMS estimates that in 2010, these contractors will issue an estimated 1 million requests for medical documentation from Medicare providers

» Claim review contractors currently receive most medical documentation in paper form.

» Claim review contractors currently receive a tiny number of imaged documents in CD/DVD form.
Today’s Medical Documentation Process

Review Contractors send a paper request letter to the provider

Provider sends a paper medical record to the Review Contractor

The ASK:
- Providers want an electronic mechanism
- Review contractors want an electronic mechanism
The Solution

» Phase 1:
  • Medicare RAC/MAC sends paper request letters
  • Provider sends electronic medical documentation

» Phase 2:
  • Medicare RAC/MAC sends electronic requests
  • Provider sends electronic medical documentation
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/](http://wiki.directproject.org/)

» CMS’ Office of Financial Management will conduct a pilot called **Electronic Submission of Medical Documentation (esMD)** using **Exchange**.
  • Providers may continue sending paper/fax (i.e., **esMD will be optional**)
Exchange Gateways

Like the interstate highway system, on-ramps & off-ramps are critical!

- On the Nationwide Health Information Network, on/off-ramps are called “gateways”

- CMS will use CONNECT software when building its esMD gateway
What is CONNECT?

» Gateway software

» Federally-funded and developed

» CONNECT advantages:
  
  • Open-source software solution (freely available)
  
  • Can be used by federal, other public, and/or private organizations
  
  • Decreases time to production
Most Providers Won’t Build Their Own Gateway But Will Hire 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)

2. Regional Health Information Organization (RHIO)

3. 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

4. Electronic Health Record (EHR) Vendor

5. Claim Clearinghouse
Volunteer HIHs

http://www.healthitplus.com

http://www.healthport.com

http://www.ivans.com

http://www.lacie-hie.com

http://www.mrocorp.com

http://www.risarc.com

http://www.visionshareinc.com/esMD
HIH Technical Contractors

http://www.cerner.com

Global Commerce & Information, Inc.

http://www.globalci.com/
esMD HIHs:

» Get no funding from CMS or ONC
» Attend calls with CMS (bi-weekly)
» 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 (Jul 2012)
  • Sign Legal agreements (DURSAs)
  • Test with ONC Gateway Team
What is an Nationwide Health Information Network Participant?

**ONC’s Definition Today**
A Nationwide Health Information Network Participant is a federal agency or federal contractor that has successfully completed the “on-boarding” process.

**ONC’s Definition Starting July 2012**
A Nationwide Health Information Network Participant is any organization that has successfully completed the “on-boarding” process.
esMD in April 2011

= a portion of a patient’s medical record in esMD format (e.g., a C-62 in XDR) which may contain:

= Imaged documents (PDF, TIFF)
Meta Data: Intended Recipient, Claim ID, NPI
esMD in July 2012

Content Transport Services

Nationwide Health Information Exchange

- ADR Letter
- Medicare RACs
- MACs
- CERT
- PERM
- Medicare Private Network

CONNECT Compatible

HIH

HIH

RX

H

H
esMD in October 2012 (or later)

Electronic Requests for Medical Documentation

HIH Exchange

RACs MACs CERT PERM

Medicare

Content Transport Services

ECM

Connect Compatible

Medicare Private Network

The Office of the National Coordinator for Health Information Technology
Medicare RACs accepting esMD in April 2011
MACs Accepting esMD in April 2011

- Palmetto
- Noridian
- WPS
- Cahaba
- FCSO
- Trailblazer
- Highmark
- NGS
Also Accepting esMD in April 2011:
» CERT Contractor
» PERM Contractor

Accepting esMD in May 2011 or later:
» RAC C
» Zone 1 ZPIC
» Zone 7 ZPIC

Accepting esMD before December 2011:
» All remaining MACs (including DME MACs)
## Where will HIHs offer esMD services?

<table>
<thead>
<tr>
<th></th>
<th>RAC A DCS</th>
<th>RAC B CGI</th>
<th>RAC D HDI</th>
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## Where will HIHs offer esMD services?

<table>
<thead>
<tr>
<th>HIHs Offering esMD Services</th>
<th>MAC J1 (CA, NV, HI)</th>
<th>MAC J3 (AZ, MT, ND, SD, UT, WY)</th>
<th>MAC J4 (CO, NM, OK, TX)</th>
<th>MAC J5 (NE, KS, IA, MO)</th>
<th>MAC J9 (FL, PR, VI)</th>
<th>MAC J10 (AL, GA, TN)</th>
<th>MAC J12 (DE, DC, MD, NJ, PA)</th>
<th>MAC J13 (CT, NY)</th>
<th>MAC J14 (ME, MA, NH, RI, VT)</th>
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Providers submitting via esMD

» In April 2011, we estimate:
  • 74 Part A providers
  • 209 Part B providers

» In December 2011, we estimate:
  • 592 Part A providers
  • 1091 Part B providers
Definition of an esMD Package

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

» Imaged documents (PDF and TIFF)

» Important Metadata Fields:
  • Intended Recipient – Required Field
  • Claim ID – Required Field
  • NPI – Required Field
  • Case ID – Required If Known

Detailed description for each field can be found in:

- the esMD Profile ([http://www.connectopensource.org/product/connect-NHIN-specs](http://www.connectopensource.org/product/connect-NHIN-specs))
## esMD Technical Documents for HIHs and IT Vendors

<table>
<thead>
<tr>
<th>Location of Document</th>
<th>esMD XDR Profile Definition</th>
<th>esMD XDR Implementation Guide</th>
<th>esMD X12 Profile Definition</th>
<th>esMD X12 Implementation Guide</th>
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</thead>
<tbody>
<tr>
<td>CONNECT transport support</td>
<td>XDR interchange Module in <strong>CONNECT v3.1</strong></td>
<td>X12 Interchange support is TBD</td>
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<td>Payloads Accepted</td>
<td>Initially, will accept HITSP C-62 unstructured documents in XDR interchange</td>
<td>Initially, will accept HITSP C-62 unstructured documents in ASC x12 275 EDI interchange</td>
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<tr>
<td>Date HIHs Can Begin Submitting</td>
<td>esMD Go Live Date (April 2011)</td>
<td>TBD (probably September 2011 or later)</td>
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</table>
Want to become an esMD HIH?

» Fill out an esMD HIH Questionnaire at the QSSI booth #6243

» 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 (see slide 10)

» Consider contacting one of the IT vendors currently assisting esMD HIHs (see slide 11)

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

» February 2011:
  Security testing and evaluation of CMS Gateway

» March 2011:
  test CMS Gateway with HIHs’ Gateways
  test Content Transport Service with Medicare RACs/MACs

» April 2011:
  Go Live (providers start submitting documentation for real cases)
For More Information

To contact anyone on the esMD Team (CMS, QSSI, CAS Severn): esMDTeam@qssinc.com

CMS esMD Website: www.cms.gov/esMD

CONNECT Website: http://www.connectopensource.org
Questions from the audience
High Level Business Concept

Provider Setting
EHR

HIH
CONNECT Adaptor
CONNECT Gateway

Internet

esMD Response SOAP Message
esMD Request SOAP Message

XML Gateway (Data Processor)

CMS CONNECT Gateway (Connect Based Routing)

App Zone

esMD Document

MQ

Data Zone

esMD CONNECT Adapter

esMD Content Management (ECM)
esMD Statistical & Error Database (Oracle)

Private Network

PERM
CERT
RAC
MAC

Claim Reviewer

esMD Request SOAP Message

Response SOAP Message

1 4 13
2
15
3
External and Internal Communications

1. HTTP 200 Transmission Acknowledgement

2. XDR Deferred Document Submission Response with Conformation and validation Success/Failed Status

3. XDR Deferred Document Submission Response with Conformation and validation Accept/Reject
Standards Conversion

**XDR - SOAP Envelope**

SOAP Envelope over HTTP

```xml
<SOAP Header>
  esMD SAML Assertions
</SOAP Header>

<SOAP Body>

Transaction

XDR Metadata
(Submission Set & Document Metadata)

XDR Document - HITSP C62 Construct

  C62 Meta Data (optional)

  C62 – PDF & TIFF Images
  (Related to same claim or Case ID)

  C62 - base 64 encoding MTOM Attachment

</SOAP Body>```
Standards Conversion

Data Transformation Flow

Provider and HIH

Paper Documents  →  PDF or TIFF  →  C62 XML  →  XDR Interchange with Assertions Metadata & C62  →  SOAP Envelope with XDR

CMS esMD Gateway

SOAP Envelope with XDR  →  XDR Interchange with Assertions Meta Date & C62  →  Metadata XML  →  Canonical XML

HITSP C62 Construct  →  PDF and TIFF images to Repository  →  Objects  →  Structured data into Database
Transition Slide