

Medicare Diabetes Prevention Program (MDPP) Recordkeeping Guidance

In the Centers for Medicare & Medicaid Services’ (CMS) MDPP expanded model, MDPP suppliers are required to maintain a crosswalk that lists participant identifiers used for the Centers for Disease Control and Prevention (CDC) performance data submissions and the corresponding Medicare identifiers for each participant who receives MDPP services. This requirement is essential for the evaluation of the MDPP expanded model.

This document provides guidance on the form and manner in which the MDPP supplier must maintain supplier records and the MDPP crosswalk, including:

I. Supplier Recordkeeping

Closely tracking, recording, and monitoring participant data is essential to the success of an MDPP supplier. MDPP suppliers must keep participant records using an electronic health records (EHR) system or paper system. During each MDPP session, the MDPP suppliers must record all applicable information listed in Table 1.

Table 1: MDPP Supplier Record Maintained

Upon the first session, suppliers must record:	Upon each additional MDPP session, suppliers must record:	When applicable, MDPP supplier records must indicate when an MDPP participant:
<ul style="list-style-type: none"> • MDPP supplier name, CDC Organization Code, and NPI • Participant information, including but not limited to: <ul style="list-style-type: none"> - Participant name, - Medicare Beneficiary Identifier (MBI), and - Participant Age • Evidence that each participant meets eligibility requirements 	<ul style="list-style-type: none"> • Session type <ul style="list-style-type: none"> - Core, core maintenance, or ongoing maintenance • Regularly scheduled or make-up session • whether the session was delivered in-person, or through distance learning • NPI of coach furnishing session • Date and place of session • Curriculum topic • Each participant’s weight - 	<ul style="list-style-type: none"> • Has attended core sessions • Has achieved 5% weight loss • Has attended core maintenance sessions • Has achieved at least 9% weight loss

MDPP supplier must maintain participant records for 10 years following the last day of an MDPP participant’s receipt of MDPP services, though there are certain circumstances where this may be extended.

Example: MDPP Supplier A furnished its last session of MDPP services for participant John Smith on December 31, 2020. MDPP Supplier A must maintain John Smith’s participant written or electronic records until January 1, 2030, unless otherwise directed.

II. Crosswalk Data

The crosswalk data must be maintained and entered into an online database for reporting purposes as described in the “[How to Submit](#)” section of this guidance. These data should be submitted in two sections; the first for “FFS Medicare” and a second for “Medicare Advantage” Participants. We strongly encourage MDPP suppliers to establish these data as soon as they begin to furnish MDPP set of services.

III. Crosswalk Submission Due Dates Quarterly Submission Dates

Once an MDPP supplier furnishes MDPP services for six months, the MDPP supplier must begin to submit a crosswalk at each of the quarterly due dates indicated in Table 3.

To determine when your organization must submit its first crosswalk to CMS, you must identify the date that your organization furnished its first session of MDPP services. Using the first column in Table 2, identify the date range in which the date of your first session falls. The date indicated in the second column will be the date on which your organization must submit its first crosswalk to CMS and its contractor. In the initial crosswalk, MDPP suppliers should include all participants to whom they have furnished MDPP services by the end of the month prior to the first submission due dates.

Table 2: Determining When Your Organization Should Submit Its First MDPP Crosswalk

Date of first MDPP session provided by the MDPP supplier	Date of MDPP supplier’s first crosswalk submission
Between April 1 and June 30	Quarter 1: January 15
Between July 1 and September 30	Quarter 2: April 15
Between October 1 and December 31	Quarter 3: July 15
Between January 1 and March 31	Quarter 4: October 15

Example: MDPP Supplier A furnished its first session of MDPP services on October 15, 2023 and it will have furnished MDPP services for six months as of April 15, 2024. October 15th falls within the date range in the third row of Table 2. Therefore, MDPP Supplier A is required to submit its first crosswalk by July 15, 2024. In that crosswalk, MDPP Supplier A will include all participants to whom it furnished MDPP services between October 15th, 2023 and June 30th, 2024.

After submission of the initial crosswalk, all MDPP suppliers must continue to submit an updated crosswalk at each of the quarterly due dates listed in Table 3. As noted above, an MDPP supplier’s first crosswalk submission will include all participants to whom the MDPP supplier furnished MDPP services in its initial six months of furnishing services. For subsequent crosswalks, the MDPP supplier

will continue to add to the original crosswalk by adding all new participants to whom the MDPP supplier furnished services during that quarter.

Table 3: MDPP Crosswalk Quarterly Submission Dates

Quarter 1: October 1 – December 31	Quarter 2: January 1 – March 31	Quarter 3: April 1 – June 30	Quarter 4: July 1 – September 30
Due Date: January 15th	Due Date: April 15th	Due Date: July 15th	Due Date: October 15th
Additional MDPP participants to include in crosswalk:			
All Medicare participants who received at least one MDPP session from the supplier between October 1 – December 31 of the previous year	All Medicare participants who received at least one MDPP session from the supplier between January 1 – March 31 of the current year	All Medicare participants who received at least one MDPP session from the supplier between April 1- June 30 of the current year	All Medicare participants who received at least one MDPP session from the supplier between July 1 – September 30 of the current year

Example: After its first crosswalk submission, MDPP Supplier A must continue to submit a crosswalk at all subsequent quarterly due dates. These due dates will always be on the dates indicated in Table 3. MDPP Supplier A submitted its first crosswalk during the April 15th due date, so their next submission due date is on July 15th. For that submission, MDPP Supplier A will add all Medicare participants who received at least one MDPP session from the supplier between April 1-June 30 (Quarter 3) to the crosswalk that the organization submitted for the April due date. MDPP Supplier A will continue this process at each quarterly due date indicated in Table 3 until they are no longer enrolled in Medicare as an MDPP Supplier.

IV. Participants to Include in a Crosswalk **Who to Include**

Only eligible Medicare participants who receive services from an MDPP supplier should be included in that supplier’s crosswalk. This includes individuals that receive their Medicare Part B coverage via Fee-for-Service (FFS) Medicare or a Medicare Advantage (MA) plan, known as Medicare Part C. If an MDPP supplier provides services to non-Medicare participants, the MDPP supplier should **not** include these individuals in the crosswalks submitted to CMS. This is true even if the MDPP supplier serves Medicare participants and non-Medicare individuals in the same cohort or class.

In each quarterly crosswalk submission, an MDPP supplier should include all Medicare participants to whom the MDPP supplier has furnished at least one session of MDPP services. Suppliers should include all participants up to the last day of the month prior to the crosswalk due date.

Example: For the quarterly crosswalk due to CMS on January 15th, an MDPP supplier must include all participants to whom the MDPP supplier has furnished MDPP services on or before December 31st.

Making the Crosswalk Cumulative

The crosswalk submission from an MDPP supplier must be cumulative. This means that for each crosswalk submitted to CMS, an MDPP supplier must include all participants to whom the MDPP Supplier has ever furnished at least one session of MDPP services by the cut-off date indicated in Table 3.

Example: For the second quarterly crosswalk due on April 15th, an MDPP supplier must include all participants included in its January 15th crosswalk submission plus any additional participants to whom the MDPP supplier has furnished at least one session of MDPP services between January 1st and March 31st of that year.

Sorting Participants by Medicare Coverage Type

When adding a participant to the crosswalk, the MDPP supplier should take note of the source of the participant's Medicare Part B coverage. Information for participants who receive their Medicare Part B coverage through FFS Medicare should be included in the "FFS Medicare" section. Similarly, information for participants who are enrolled in (and therefore receive their Medicare Part B coverage through a MA plan) should be included in the "Medicare Advantage" section.

Participants who switch between Fee-for-Service and Medicare Advantage

Medicare participants may switch between FFS Medicare coverage and enrollment in a MA plan during their services period. In these cases, the MDPP supplier should keep the participant listed on the original section representing the first type of coverage they had, and add the participant to the other section representing the new coverage.

Example: A participant is listed on the FFS Medicare section and then switches to an MA plan for the rest of their services period. The supplier would keep the participant listed on the "FFS Medicare" section and would add the participant to the "Medicare Advantage" section. In all subsequent crosswalks submitted, the participant would be listed on both the FFS and MA sections.

V. Data Required in a Crosswalk

For each participant listed in the "FFS Medicare" section, the supplier must include the CDC Organizational Code, Participant Code, and Medicare Identifier, as shown below in Table 4. For each participant listed in the "Medicare Advantage" section, the supplier must include the CDC Organizational Code and Participant Code only, as shown below in Table 5. Details on how information must be entered for each data element are provided below.

Table 4: “FFS Medicare” Section

CDC Organizational Code	Participant Code	Medicare Identifier(s)	COVID-19 Related Restart	COVID-19 Restart Date & Year	Reassign Participant Code
CDC-provided organizational code of the entity providing MDPP services to the Medicare participant	MDPP Supplier-created participant identifier that is also used for CDC data submission	Medicare Participant Identifier (MPI); MPI is a randomly generated 11-digit alpha-numeric number that replaced the Health Insurance Claim Number (HICN)	Following the COVID-19 guidance, certain participants were permitted to restart MDPP	If YES to restarting MDPP, provide the date of the first session after re-starting the program.	If YES to restarting MDPP, provide the new CDC participant code assigned to the participant for their restart of the program

Table 5: “Medicare Advantage” Section

CDC Organizational Code	Participant Code	COVID-19 Related Restart	COVID-19 Restart Date & Year	Reassign Participant Code
CDC-provided organizational code of the entity providing MDPP services to the Medicare participant	MDPP Supplier-created participant identifier used for CDC data submission	Following the COVID-19 guidance, certain participants were permitted to restart MDPP	If YES to restarting MDPP, provide the date of the first session after re-starting the program	If YES to restarting MDPP, provide the new CDC participant code assigned to the participant for their restart of the program

A. CDC Organizational Code

CDC assigns each National Diabetes Prevention Program (DPP) organization an organizational code when the organization’s application for CDC recognition is approved. CDC recognition is delivery mode specific (e.g., in-person, distance learning (live), in-person with a distance learning component, online (non-live), and combination with an online component). An organization may be provided with up to five separate organizational codes if it offers DPP services via more than one delivery mode and applies for recognition in more than one delivery mode. Beginning January 1, 2025, only in-person, distance learning, and in-person with a distance learning component delivery mode organizational codes should be reported on the crosswalk submitted to CMS.

Including the Organizational Code on the Crosswalk

For each participant listed in an MDPP Supplier's crosswalk, MDPP suppliers must include the organizational code of the entity that provided MDPP services to that participant. This should be listed in a column entitled "Organizational Code." This information must be included for participants listed in the "FFS Medicare" section and the "Medicare Advantage" section of the crosswalk. As a reminder, only in-person, distance learning (live), and in-person with a distance learning component delivery mode organizational codes should be reported on the crosswalk submitted to CMS.

On their CMS enrollment online application through the Provider Enrollment Chain and Ownership System (PECOS), MDPP suppliers, depending on how they structure themselves, can list only one organizational code, or multiple organizational codes if they offer services across delivery modes and different DPP organizations. MDPP suppliers should use the following guidance to determine what codes must be provided on their crosswalk in depending on their scenario:

- i. One CDC organizational code associated with one MDPP supplier enrollment:** If an MDPP supplier has only one organizational code associated with its single and only MDPP supplier enrollment, all participants listed in the supplier's crosswalk will have the same organizational code.
- ii. One CDC organizational code associated with multiple MDPP supplier enrollments:** If an organization with one organizational code is associated with multiple MDPP supplier enrollments, the MDPP supplier should submit one crosswalk per MDPP supplier enrollment. This may be the case if an organization with CDC recognition has administrative locations in different states and has enrolled separately in these states under the same CDC recognition. Separate crosswalks would list the same organizational code of the organization that provided MDPP services to participants.
- iii. Multiple organizational codes associated with one MDPP supplier enrollment:** If an MDPP supplier has multiple organizational codes associated with a single MDPP supplier enrollment, the MDPP supplier will submit only one crosswalk. For example, this may be the case if an MDPP supplier includes multiple DPP organizations in a particular region or different delivery modes (e.g., in-person or distance learning (live)). For each given participant listed in the crosswalk, the supplier should provide the organizational code of the organization that provided MDPP services to that participant.
- iv. Participants who switch between CDC organizational codes within the same MDPP supplier enrollment:** If an MDPP supplier has multiple organizational codes associated with a single MDPP supplier enrollment, and it furnishes MDPP services at multiple locations, participants may choose to switch from one of these locations to another. If a participant switches from one location to another location of that same MDPP supplier, and the new location is associated with a different organizational code, the MDPP supplier should create an additional

crosswalk entry (i.e. a new row) within the same crosswalk for the participant that is associated with the organizational code for the second location.

B. Participant Code

The CDC Diabetes Prevention Recognition Program (DPRP) requires organizations to assign each individual (participant) who participates in the organization’s DPRP classes a unique identifier for the purposes of performance data submission. CDC stipulates that this identifier cannot exceed 25 alphanumeric characters and that the same identifier cannot be used more than once per organizational code. For each participant listed in the crosswalk, the MDPP supplier should provide in the column entitled “Participant Code” the unique participant code assigned to that particular participant, which the MDPP supplier created for CDC data submissions. This information must be included for participants listed in both the “FFS Medicare” section and the “Medicare Advantage” section of the crosswalk.

In accordance with the CDC requirement, all participant codes associated with an organizational code should be unique to a single Medicare participant and should never be repeated. Therefore, where an MDPP supplier has only one organizational code associated with its MDPP enrollment, every participant code will be unique. If an MDPP supplier has multiple organizational codes associated with a single enrollment, all participant codes listed in the crosswalk may not be unique, but the combination of the organizational code and the participant code must be unique.

Example: An MDPP supplier furnished MDPP services at Location A (associated with CDC organizational code 000123) as well as Location B (associated with CDC organizational code 000456). Location A can assign the participant code 5 to a participant, and Location B can also assign the participant code 5 to a different participant, because the organizational code-participant code combination is unique (000123-5 and 000456-5).

C. Medicare Identifier

Each Medicare participant is assigned an identifier by Medicare. This unique Medicare Number, called the **Medicare Participant Identifier (MBI)**, is a randomly generated 11-digit alpha-numeric character. Starting January 1, 2020, participants must use the MBI for most Medicare transactions. For patients with these plans, continue to ask for and use the plans’ health insurance cards. Learn more about Medicare Beneficiary Identifier at:

<https://www.cms.gov/training-education/partner-outreach-resources/new-medicare-card/medical-beneficiary-identifiers-mbis>

The MDPP supplier must provide the MBI for each participant listed in the “FFS Medicare” section. Please note that MBIs are Protected Health Information (PHI) and suppliers should handle this information in compliance with HIPAA and all applicable state and federal privacy laws and standards.

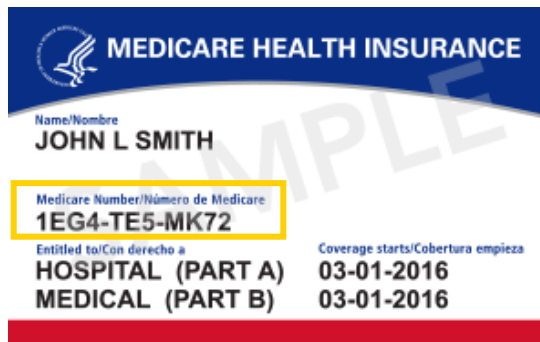
How to identify a participant's MBI

i. MBI Look-up Tool

You can use your Medicare Administrative Contractor's (MAC's) secure portal Medicare Beneficiary Identifier (MBI) look-up tool, which returns participants' MBIs even if the participant has not received his new card yet. If you do not already have access, sign up for your MAC's portal to use the tool at <https://www.cms.gov/mac-info>.

ii. Review Medicare Card

Example Medicare Health Insurance Card



When a participant presents their Medicare card, the participant's 11 digit MBI will contain letters and numbers throughout.

Here's an example of an MBI: 1EG4-TE5-MK72

- The MBI's 2nd, 5th, 8th, and 9th characters will always be a letter.
- Characters 1, 4, 7, 10, and 11 will always be a number.
- The 3rd and 6th characters will be a letter or a number.
- The dashes aren't used as part of the MBI. They won't be entered into computer systems or used file formats.

Participants with Medicare Advantage (MA)

Because participants who receive their Medicare Part B coverage via a MA plan will have a member identifier assigned by their MA plan, MDPP suppliers are not required to include the MBI for participants listed in the "Medicare Advantage" section of the crosswalk.

VI. Notifications from CMS

Email Reminders

Thirty (30) calendar days prior to each quarterly submission due date, CMS or its contractor will send a reminder via email to MDPP suppliers, regarding the upcoming due date. MDPP supplier related updates, information, and reminders—including crosswalk reminders—are sent to MDPP

suppliers through the MDPP supplier-specific listserv. Your organization must sign up to be added to the supplier-specific listserv in order to receive these notifications. MDPP suppliers can sign up at any time by sending a request to be added to the MDPP supplier listserv to the MDPP mailbox at MDPP@cms.hhs.gov. In that request your organization should include at least one contact email. You may contact the MDPP mailbox at any time to request that an email be added or removed from the MDPP Supplier Listserv.

CMS may follow up in writing if an MDPP supplier that was due to submit the crosswalk does not submit the data by the required due date. *MDPP suppliers who do not submit a crosswalk in a timely manner may have their Medicare enrollment revoked for noncompliance with MDPP supplier standards.*

VII. How to Submit the Crosswalk

All organizations must enter their crosswalk data into an online database created by our contractor, RTI International. This secure portal is where you will enter the requisite data. Specific login IDs and passwords ensure that only your organization and CMS can access MDPP data entered into the portal.

REGISTRATION LINK: <https://mdpp.knack.com/registration>

If you receive an error message when you click on the link, this error message is likely due to your organization's firewall protections. If you encounter this message, please email RTIsuppliercrosswalkhelp@RTI.org.

Within one week after you register, login information will be sent to your organization along with detailed instructions on how to access the portal. MDPP suppliers are encouraged to register far in advance of their first crosswalk submission so that your organization may gain access to the MDPP crosswalk portal and begin entering your data prior to your first crosswalk submission due date.

CMS does not stipulate which team member of an enrolled organization must submit the crosswalk. However, maintenance and submission of the crosswalk is an MDPP supplier requirement and failure to fully comply with the crosswalk submission requirement may result in revocation of the organization's enrollment in Medicare as an MDPP supplier. Please keep this in mind if your organization is working with a vendor to furnish services.

VIII. Additional Crosswalk Resources

- MDPP Crosswalk Frequently Asked Questions can be found on the MDPP FAQ page accessed here: <https://www.cms.gov/priorities/innovation/innovation-models/medicare-diabetes-prevention-program/faq>
- The MDPP Crosswalk Guidance Webinar slides can be found at <https://innovation.cms.gov/Files/slides/mdpp-crosswalk-slides.pdf>.
- MDPP Crosswalk Submission Flowchart can be found here: <https://innovation.cms.gov/Files/x/mdpp-crosswalk-flowchart.pdf>
- For any additional questions, please contact RTIsuppliercrosswalkhelp@rti.org