CMS Manual System	Department of Health & Human Services (DHHS)
Pub 100-20 One-Time Notification	Centers for Medicare & Medicaid Services (CMS)
Transmittal 10409	**Date: October 27, 2020**
	Change Request 11637

Transmittal 10271, dated Month August 7, 2020, is being rescinded and replaced by Transmittal 10409, dated, October 27, 2020 to remove MCS from the April release. All other information remains the same.

SUBJECT: Utility to Reprocess Bypassed Common Working File (CWF) Informational Unsolicited Responses (IURs)

I. SUMMARY OF CHANGES: This change request (CR) will create a reusable process to allow CMS to direct the reprocessing of bypassed IURs as needed. The new process will initially be used for the recoupment of OIG Identified Overpayments for post-acute transfer IPPS claims.

This CR will span the January and April 2021 releases. MCS will complete all development activities and send the changes to production in the January release although the new report will not be generated until the April release. MCS will provide support for full implementation in April. All other maintainers: Analysis and Design will be completed with the January Release. Coding, Testing and Implementation will be completed in the April Release.

EFFECTIVE DATE: January 1, 2021; April 1, 2021
*Unless otherwise specified, the effective date is the date of service.
IMPLEMENTATION DATE: January 4, 2021 - FISS, CWF and VMS: Analysis and Design, MCS: Analysis, Design, Coding, Testing and Implementation; April 5, 2021 - FISS, VMS, CWF: Coding, Testing and Implementation, MCS: Implementation Support

Disclaimer for manual changes only: The revision date and transmittal number apply only to red italicized material. Any other material was previously published and remains unchanged. However, if this revision contains a table of contents, you will receive the new/revised information only, and not the entire table of contents.

II. CHANGES IN MANUAL INSTRUCTIONS: (N/A if manual is not updated)
R=REVISED, N=NEW, D=DELETED-*Only One Per Row.*

R/N/D	CHAPTER / SECTION / SUBSECTION / TITLE
N/A	N/A

III. FUNDING:
For Medicare Administrative Contractors (MACs):
The Medicare Administrative Contractor is hereby advised that this constitutes technical direction as defined in your contract. CMS does not construe this as a change to the MAC Statement of Work. The contractor is not obligated to incur costs in excess of the amounts allotted in your contract unless and until specifically authorized by the Contracting Officer. If the contractor considers anything provided, as described above, to be outside the current scope of work, the contractor shall withhold performance on the part(s) in question and immediately notify the Contracting Officer, in writing or by e-mail, and request formal directions regarding continued performance requirements.

IV. ATTACHMENTS:

One Time Notification

Attachment - One-Time Notification

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I.   GENERAL INFORMATION

A.   Background: The Centers for Medicare & Medicaid Services (CMS) has used the Common Working File (CWF) Informational Unsolicited Response (IUR) to enforce many Medicare payment policies when the policy is applied based on the full claim history or beneficiary eligibility information. CWF will trigger an IUR when an incoming claim or change in beneficiary eligibility causes a previously processed claim to be incorrect. CWF sends the IUR to the Shared Systems in the nightly batch reply file. The Fee for Service payment systems have processes to initiate an adjustment to the paid claim when it receives the IUR.

The Shared Systems do not always create the IUR adjustment through the batch process. It is the Medicare Administrative Contractor's (MAC's) responsibility to follow-up on the bypassed IURs and create the adjustment manually when necessary.

A recent Office of the Inspector General (OIG) audit found a large volume of unadjusted post-acute care inpatient transfer claims with service dates from 2016 to 2018. Research by the CWF Host found that CWF triggered an IUR with the 7272 error but an adjustment was never processed. CMS requires the ability to identify and initiate recovery for unprocessed IURs to comply with the OIG recommendations and analyze the other CWF IUR errors to initiate recovery where appropriate.

This Change Request (CR) will create a new CWF process to retrigger any IUR when CMS determines it is appropriate. The Shared Systems will also develop the ability to create an IUR adjustment or an OIG adjustment based on the source of the request. Additionally, this CR will create new CWF reports to provide information to CMS on the volume of unprocessed IURs by error and claim details when necessary.

B.   Policy: No new policy changes are associated with this change request.

II.   BUSINESS REQUIREMENTS TABLE

"Shall" denotes a mandatory requirement, and "should" denotes an optional requirement.

Number	Requirement	A/B MAC			DME MAC	Shared-System Maintainers				Other
		A	B	HHH		FISS	MCS	VMS	CWF	
11637.1	CWF shall design a program to create a retrigger for IURs that were never processed.								X	
11637.1.1	CWF shall accept the following variables to be used as selection criteria: • Unsolicited indicator (UNSOL IND) • Date Parameter (From and Through Date for the claim the UNSOL IND was previously generated on) • Claim Type: If blank applies to all claims affected by the UNSOL IND or 'I' (Inpatient/SNF) 'O' (Outpatient Institutional), 'H' (Home Health), 'P' (Hospice), 'B' (Part B Professional) or 'D' (DMEPOS). CWF will only carry one value or blank to apply to all claims for the UNSOL IND.								X	
11637.1.1.1	The CWF Host shall set the selection criteria each time the program is executed.									CWF Host
11637.1.2	CWF and the CWF Host shall ensure that the new program selects claims from the CWF history that contain the selection values set by the host if the cancel date is equal to spaces.								X	CWF Host
11637.2	CWF shall create one new additional value in the response for the type of IUR which shall identify the type of adjustment to be created. • R for the CMS retrigger IUR								X	
11637.2.1	The SSMs shall accept the additional value in the fixed portion of the response record for the retrigger IURs.					X	X	X		
11637.2.1.1	The SSMs shall report the retriggered IURs on a new or existing report.					X	X	X		
11637.3	CWF shall send the retriggered IURs in the nightly reply file and send them to the MAC who processed the claim.								X	CWF Host
11637.3.1	SSMs shall bypass any retriggered IUR that does not match to a claim in history and follow existing					X		X		

Number	Requirement	A/B MAC			DME MAC	Shared-System Maintainers				Other
		A	B	HHH		FISS	MCS	VMS	CWF	
	processes for bypassed IURs.									
11637.4	The SSMs shall receive only the trailer 24 identifying the claim in history from the retrigger IURs.					X	X	X	X	
11637.4.1	SSMs shall create an adjustment that mirrors the paid claim for the retriggered IURs.					X		X	X	
11637.4.1.1	The SSM shall cycle the adjustment to CWF using existing processes.					X		X		
11637.4.1.1.1	CWF shall edit the adjustment using existing edit criteria and assign a batch edit if the IUR trigger scenario is still valid.								X	
11637.4.1.2	CWF shall return the appropriate trailers for each edit with the batch reply.								X	
11637.4.2	MCS shall create a new report for retriggered IURs received from CWF.						X			
11637.4.2.1	The MACs shall monitor the report to ensure the MCS IUR recycle process continues to enforce processing of all CWF IURs.		X							
11637.5	CWF HOST shall have the ability to run the program to retrigger IURs in a Test or Production mode.								X	
11637.5.1	CWF shall ensure Test mode produces a report listing the identified claims to identify the volume of unprocessed IURs by host.								X	
11637.6	CWF shall create a report with the HICNs, ICNs, UNSOL IND and total count per host of the records identified for the retriggered IURs.								X	
11637.7	CMS shall determine when the IUR Retrigger process should be run and communicate the parameters to the CWF Host and MACs.									CMS
11637.8	The SSMs shall modify any utilities used to generate IURs for Alpha testing to include the ability to generate the retriggered IURs.					X	X	X		
11637.9	CMS shall facilitate up to four weekly testing calls during the Alpha test phase. Testing calls are optional					X	X	X	X	CWF Host

Number	Requirement	Responsibility								
		A/B MAC			DME MAC	Shared-System Maintainers				Other
		A	B	HHH		FISS	MCS	VMS	CWF	
	and shall only be held if needed to discuss and resolve issues.									
11637.9.1	Contractors shall submit testing contacts to Rita.Hazlip@cms.hhs.gov by October 1, 2020.					X	X	X	X	CWF Host

III. PROVIDER EDUCATION TABLE

Number	Requirement	Responsibility				
		A/B MAC			DME MAC	CEDI
		A	B	HHH		
	None					

IV. SUPPORTING INFORMATION

Section A: Recommendations and supporting information associated with listed requirements: N/A

"Should" denotes a recommendation.

X-Ref Requirement Number	Recommendations or other supporting information:

Section B: All other recommendations and supporting information: N/A

V. CONTACTS

Pre-Implementation Contact(s): Rita Hazlip, 410-786-5755 or Rita.Hazlip@cms.hhs.gov , Jamie Mcleod, Jamie.Mcleod@cms.hhs.gov

Post-Implementation Contact(s): Contact your Contracting Officer's Representative (COR).

VI. FUNDING

Section A: For Medicare Administrative Contractors (MACs):
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be outside the current scope of work, the contractor shall withhold performance on the part(s) in question and immediately notify the Contracting Officer, in writing or by e-mail, and request formal directions regarding continued performance requirements.

ATTACHMENTS: 0