



Submitting Your Medicare Part A Cost Report Electronically Webcast


Moderated by Diane Maupai
November 5, 2019 — 1:00 pm ET

Table of Contents

| | |
|---|----|
| Announcements & Introduction..... | 2 |
| Presentation | 2 |
| New MCR Submission Process | 4 |
| MCReF Provider User Experience | 10 |
| Ongoing Outreach and Education | 11 |
| New MCReF Functionality Coming Soon | 11 |
| Question & Answer Session | 11 |
| Additional Information..... | 19 |

This transcript was current at the time it was published or uploaded onto the web. Medicare policy changes frequently so links to the source documents have been provided within the document for your reference.

This transcript was prepared as a service to the public and is not intended to grant rights or impose obligations. This transcript may contain references or links to statutes, regulations, or other policy materials. The information provided is only intended to be a general summary. It is not intended to take the place of either the written law or regulations. We encourage readers to review the specific statutes, regulations, and other interpretive materials for a full and accurate statement of their contents.



Operator: Hello and welcome to today's Medicare Learning Network® Event. My name is Michelle and I'll be your event specialist today. All lines have been placed on mute to prevent any background noise. Please note that today's event is being recorded. During the presentation, we'll have a question and answer session. You can ask text questions at any time. Click the green Q&A icon on the lower left-hand corner of your screen. Type your question in the open area and click Submit. We will also be taking questions via the phone lines and instructions on how to do so will be given at the appropriate time.

If you would like to view the presentation in a full screen view, click the Full Screen button in the lower right-hand corner of your screen. Press the Escape key on your keyboard to return to your original view. And for optimal viewing and participation, please disable your pop-up blockers. And finally, should you need technical assistance, as a best practice we suggest you first refresh your browser. If that does not resolve the issue, please click on the Support option in the upper right-hand corner of your screen for online troubleshooting.

It is now my pleasure to turn today's program over to Diane Maupai, Ma'am the floor is yours.

Announcements & Introduction

Diane Maupai: Thank you, Dorothy. This is Diane Maupai from the Provider Communications Group at CMS, and I'll be your moderator today. Welcome to this Medicare Learning Network webcast on Submitting Your Medicare Part A Cost Report Electronically. Before we get started, there are a few items I'd like to cover. We're using webcast technology today. We recommend streaming the audio live through your computer speakers. If you're participating via webcast, you can download a copy of today's slide presentation by clicking the blue Files button at the bottom left side of your screen. Please note that this event is being recorded and transcribed.


Today's event is not intended for the press, and the remarks are not considered on the record. If you're a member of the press, you may listen, but please refrain from asking questions during the Q&A session. If you have inquiries, contact press@cms.hhs.gov. I will now turn the call over to Owen Osaghae from CMS.

Presentation

Owen Osaghae: Thank you Diane. My name is Owen Osaghae. I'm the Business Owner for the MCR eF system, which is the Medicare Cost Report e-Filing system. Today, Patrick Herrity of CGI Federal is going to be speaking and presenting the slides for this presentation. At the end of the presentation I will assist on answering some of the questions. I'm going to hand over to Patrick now. Thank you.

Patrick Herrity: Thank you Owen. Please proceed to slide 2. This slide is just the acronyms that will be used throughout the presentation for reference for future use as you're looking through the slide deck after the event. Please proceed to slide 3.

Today, we'll be introducing the Medicare Cost Report e-Filing system known as MCR eF and we will also be communicating additional resources and information available to the provider community as it relates to MCR eF. Please proceed to slide 4.



So, the agenda for today, we've already covered the introductions. We'll give a brief background and overview of the area of Medicare that MCR eF is applicable to. We'll give a walkthrough and detailed overview of MCR eF and then discuss ongoing outreach and education and we'll conclude today's call with a question answer session. Please proceed to slide 5.

So really quickly before we get into discussion about MCR eF or for details about MCR eF, we wanted to give a quick overview or business overview of the area of Medicare that MCR eF is applicable to and that's the Medicare Cost Report. The Medicare Cost Report is used to determine Part A providers' annual Medicare reimbursable cost. Providers use a variety of sources to create their Cost Report package, including provider statistical and reimbursement system claims reimbursement data.

There are about 50,000 Cost Reports submitted each year that account for over \$200 billion dollars' worth of Medicare reimbursement. Providers have a regulation specified deadline for submitting an acceptable Cost Report to their MAC and Medicare Administrative Contractors. MACs also have requirements for receiving, accepting, reviewing, auditing, and finalizing costs reports submitted by providers. Please proceed to slide 6.


Historically, there's been a physical Cost Report submission and receipt process. So here we'll go over historically how that process has worked at a high level. So for providers, you create your Cost Report package, which will include some, if not all, of these materials mentioned here in the sub bullets such as: an electronic media computer readable version of the Cost Report, which is a custom text file, sometimes known as the ECR file; a human readable version of the Cost Report usually in PDF format; Interns and Resident's data, also known as IRIS data, and required supporting materials; and also Worksheet S which is the Signed Certification page with an original ink signature by an officer of the provider's organization.

Historically, most of the Cost Report are mailed or hand delivered with a few in the past being transmitted via MAC portals. Once received, the MAC has 30 days to perform an acceptability review of the Cost Report submission. Please proceed to slide 7.

So, CMS has essentially the goal to improve upon the historical model, and so established the goal as mentioned on slide 7, which is to standardize, automate, and streamline the Cost Report processes for provider submission, and then MAC receipt acceptance and the subsequent handling of the provider's Cost Report. With that goal in mind, CMS established MCR eF. MCR eF, so just to give a quick high-level overview of the Medicare Cost Report e-Filing system. It's a new application allowing Part A providers to electronically transmit or e-file their Cost Report package.

The system has been available since May 1 of 2018 and so far, has seen over 19,000 successful Cost Report submissions via the system. Usage is entirely optional. So, mail and hand delivery still remain viable options if you don't use MCR eF. MCR eF is accessible by your EIDM PS&R Security Official, Backup Security Official, and MCR eF approved Cost Report Filers, those users with that role. Once you've e-filed your Cost Report through MCR eF, it will immediately become accessible and all of its materials to your MAC. Please proceed to slide 9.

Some of the advantages of MCR eF we wanted to go over at today's event is that it's a single easy to use webpage, which we will see momentarily when we do an overview of the system. It's one process defined for all providers via one submission portal. Specifically, it's available to all party providers, regardless of who your



servicing MAC is; especially beneficial to chain organizations, which have providers at multiple MACs; and anytime you have a change in your organization that may cause you to change MACs. It will reduce confusion, delays and time you spend on administrative processes.

Also, as I mentioned a moment ago, to give you immediate feedback on the receivability of your Cost Report submission. And lastly, from what we've seen so far, tentative settlement payments are being issued 8 days faster on average for MCR eF submissions, as compared to non-MCR eF submissions. Please proceed to slide 10.

New MCR Submission Process

The next we will go through the new Cost Report submission process with MCR eF in mind. Please proceed to slide 11.

The MCR eF system to be able to log in and is accessible at MCR eF.cms.gov. The access to the system is controlled by CMS as the EIDM system and specifically as restricted to EIDM PS&R Security Officials, Backup Security Officials, and MCR eF Approved Cost Report Filers, only those with that EIDM roles, and the MCR eF Approved Cost Report Filer role is new as of May 2018 when MCR eF went live. Existing PS&R SOs and BSOs will already have access by default. But any organization that doesn't have PS&R must register a PS&R SO within EIDM to then have users be able to access MCR eF.

If you want to use MCR eF, make sure to keep your credentials – your EIDM credentials – in good standing, in particular, password updates and timely replacements of your Security Officials when they leave your organization. Any issues that is particularly important is that any issues surrounding your credentials will not be a valid reason for filing late or getting an extension. So, you'll still be required essentially if you have issues with your credentials to mail your Cost Report to your MAC or having hand delivered.

And the last thing to mention, there is an enhancement that was added to the EIDM as of September of last year. Previous to September, if you attempted to request a role within EIDM for a specific organization, you can only do have one open role request at a time. And that was problematic because if you had multiple organizations you want to request roles for, you had to wait for the first one to be approved by the SOs – the organizations' SO – before you can put in a subsequent request. With that in mind, they implemented, CMS implemented enhancements to the EIDM in September of 2018, which now allows for multiple open role request regardless of whether the first one has been approved or not. Please proceed to slide 12.

Next, we'll go through how to log into the system and then how to actually use the MCR eF system. So, when you go to MCR eF.cms.gov, this is the page that you'll be seeing. It's the System Use Notification page. You'll want to read the terms and conditions and click I Accept at the bottom. Please proceed to slide 13.

Once you've accepted the terms and clicked I Accept, you'll go to the User ID page for the CMS Enterprise Portal, where you'll put in your EIDM credentials and click Next. Please proceed to slide 14.

Next, you'll put in your password and then click Login. Please proceed slide 15.



And then here's the single or the one page simple, easy to use MCRReF site, and this is what you'll see essentially. So first highlighted here with the red boxes are essentially the provider number and Fiscal Year End drop down. So, if you want to file across the board for that specific provider fiscal year, and you'll want to select those from the drop down. Please proceed to slide 16.

Then you'll select the Medicare Utilization level of the Cost Report that you're filing. The options are Full, Low, and No, and then you'll confirm whether or not this is your first Cost Report submission. That's what the right box there. It'll be Yes if it's your first. It'll be No if it's a subsequent submission from your first. Please proceed to slide 17.

Next, you will upload any Cost Report materials that are required of you as part of your typical Cost Report submission. So, in particular MCRReF will tell you based on what provider you are and what utilization level you've selected, what particular items are definitely required. So, you'll see that's denoted by an asterisk, a red asterisk to the left of the material of the specific file name for the role that you need to provide a file for. To provide a file, you'll click Browse, and via the normal pop up, you'll basically navigate to a place either on your hard drive or on a network drive to locate the file and you'll select it. And this is what it looks like once you've selected all the files.


Once you've uploaded all the files that are required, there's a checkbox down at the bottom to acknowledge that this represents your official submission of your Cost Report to CMS and your MAC. You'll check that, which will enable the Submit button, and you'll click Submit to submit your Cost Report to your MAC and CMS. Please proceed to slide 18.

Now the system does have certain receivability or validation checks to ensure that your Cost Report submission is found. So, here's an example of the provider clicking Submit and actually encountering an error with the system. When you encounter an error, the system hasn't actually received your Cost Report, your MAC has not received it, and is not aware of the submission. It's an error that you have to actually resolve to then resubmit to fix the issue and to cause your Cost Report to be received by your MAC. So, in this case, the error message pop up for that section will display at the top of the screen.

It'll give you a unique identifier for the message in case you need to communicate to your MAC or CMS about it. In this case, it's R1005 and in this case specific error that the provider encountered is at the Fiscal Year End that they have selected on the screen doesn't match the Fiscal Year End for the ECR file they uploaded. So, there's a number of issues that could possibly have caused this. They may need to talk to their MAC, specifically to see if a particular system needs to be updated to reflect the appropriate Fiscal Year End or it might be simply that they just need to regenerate their ECR with the 12/31/2017 fiscal year end.

So, going that route, let's say you fix your ECR and you establish the fiscal year ending 12/31/2017. You browse for the new ECR file down the Cost Report material section, and locate the new corrected file, and then you again check the box acknowledging this is an official submission, and you click Submit. In that case, you'll go to the confirmation screen. Please proceed to slide 19.

This is what the confirmation screen looks like. You'll see a Success Message banner at the top with a specific success message telling you that your Cost Report has been electronically postmarked with CMS, and that you need to retain the information reference below for your records. You'll see in the red box that you'll be given a



unique e-filing transaction ID and also an electronic postmark date in Eastern Standard Time. You'll also see all of the details for what you had submitted on the previous screen, such as the provider Fiscal Year End, Medicare Utilization, and the first Cost Report submission, and then any specific slots where you actually uploaded a file or then browse for it and selected it to be submitted as part of your Cost Report submission.

At the bottom, you'll see highlighted with a red box is at this point your Cost Report has been successfully received by your MAC and will be processed from there by them. If this is the only Cost Report that you need to submit, you can click the Logout button. Alternatively, if you do have other Cost Report that you need to submit, all you have to do is click File Another Cost Report button, which is down in the bottom mid to right section of the screen, and that will load the previous screen with the same provider and Fiscal Year End loaded reflecting the new information from this submission. Please proceed to slide 20.


Okay, so now we'll dive into - that was just a quick overview of how the system looks and how-to login. Now we'll actually dive more specifically into each of the fields that we saw on the previous screen. So, first is the Provider number. And that was the drop down that we saw where you picked the specific CCN that you want to file the Cost Report for. This contains all CMS certification numbers that have been registered in EIDM, which the provider's MAC also has on record in CMS's System for Tracking Audit and Reimbursements, and that's also called STAR which is a MAC maintained system.

Next is a Fiscal Year End drop down. Based on the provider that you pick, it will load all fiscal year end, so will contain the fiscal year ends of the selected provider which have occurred in the past 6 years that are on and after 12/31/2017 as recorded by the providers MAC in STAR, which I just mentioned a moment ago.

Next is the Medicare Utilization drop down. This allows providers to select the Medicare Utilization level of the Cost Report that they're e-filing. Options include Full, Low, and No. Next is the First Cost Report Submission field. This isn't a user editable field, but it indicates whether or not a Cost Report has already been recorded in STAR as received by the provider's MAC for the selected provider and fiscal year end. And lastly, the Cost Report materials table, which is used to upload all the materials via to submit a complete cost per package, which may include an ECR, a Print Image, a Signed Certification page, IRIS data, a Cover Letter, and then any additional information files that you would typically submit that don't have a dedicated slot into a ZIP file in the other slot.

But, one thing to note here at the bottom of the slide is that for some reason, if you're unable to locate the specific provider number or CCN, or Fiscal Year End from the corresponding drop down. The first thing you'll want to do is to first confirm with your Security Official of your organization that they've properly registered the CCN in question within EIDM and that you are registered to the organization with an EIDM role that allows you to use MCR eF. If you've exhausted that, and you still don't see something with the provider number or the Fiscal Year End drop downs, then you'll want to contact your MAC at that point. Please proceed to slide 21.

Next, we'll talk about the different rows and file that can be uploaded in the Cost Report material section that have the dedicated slots. First is the ECR. This is the Electronic Cost Report file, which can also be known as the EC or SN, depending on your provider type. There are different ways the file is actually named, and they're all listed there in the slide. The system requires this for all providers filing a Full Medicare Utilization Cost Report except for Home Offices and Limited Purpose Insurance Companies. The system expects a format,



which is a single file generated using a current version of CMS certified ECR vendor software that is not a PDF or a ZIP file or other archive file type. And the file limit for this slot is 1 MB.

Next is the Print Image, which is the human readable copy of the Cost Report, also known as the PI file. And for Home Offices, this is a 287-05 cost statement. The system requires a printed slot for all providers filing a Full or Low Medicare Utilization Cost Report except for LPICs, and it also requires it whenever you upload an ECR file. The format expected here is any human readable format generated using a current version of CMS certified ECR vendor software that is not a ZIP file or other archive file types. The file limit for this particular slot is 10 MB.

Next is a Signed Certification page. This is the electronically signed Worksheet S certification page for Home Offices. This is the 287-05 Schedule A. The system requires this for all providers except LPICs and the format expected is any human readable format including the encryption codes, generated using a current version of CMS certified ECR vendor software that is not a ZIP file or other archive file type. And the size limit here is 10 MB as well. Please proceed to slide 22.

Next row is IRIS. This is the Interns and Residents Information System files required for teaching hospitals claiming GME and IME Full Time Equivalents (FTEs) on their Cost Report. Currently, this is not required by the system, but may do so in the near future. The format required here is an unencrypted ZIP file containing a single set of M&A DBF files that's the Master and Assignment DBF files. The file size limit here is 1 MB.

Next is Other. This is where you would upload any other files needed for your submission to constitute and complete Cost Report package that don't otherwise have a dedicated slot. These are items such as the Working Trial Balance or the Bad Debt Listing, so on and so forth. The system requires this for all LPIC provider Cost Reports. The format, the system supports any file types including support for multiple files within a single unencrypted ZIP file for other archive file type. So, file size limit here is 300 MB and that includes like the total attached file size.

Lastly is the Cover Letter. This is a document describing the nature of the submission or any other information about the submission, you wish to communicate to your MAC up front with a provider, which is to communicate to their MAC up front. This is required for all revised Cost Reports. The format expected here is any human readable format that is not a ZIP file or other archive file type. And the file limit here is also 10 MB. Please proceed to slide 23.

Okay, the next is to cover some of the receivability, validation that we talked about earlier where we showed an example of what that looked like if you encounter an error in the system. And we'll go over those specifically in the next slide. But first, if you have any error that's displayed, your Cost Report will not be considered received. These are not considered formal rejections and don't follow CMS' formal rejection process, so your MAC won't be sending letters and following that formal process. The system essentially is telling you that this is not a valid cost for submission.

If the submission passes all the receivability validations, you'll be directed to the confirmation screen, which we saw earlier, and that screen will have a success message stating that your Cost Report was received. It will have your electronic postmark date in Eastern Time, a unique e-filing transaction ID and all the selections from the previous screen that you had selected when you submitted your Cost Report.



Lastly, on the Confirmation screen, this is where you'll want to take a screen print or leverage the printer friendly aspect of that screen to capture the contents of the screen for your records in case need to communicate with CMS or your MAC about your submission. Please proceed to slide 24.

This slide will cover the receivability criteria for e-filed Cost Report, in this case, all required Cost Report materials. To be receivable, all required materials files must be included in valid format and within the size limits that were discussed on slide 21 and 22 for each specific slot. Attached files must conform to technical restrictions. They must be virus malware free, have valid file names and must not be blank or empty. You can only submit up to one revision per day for the Fiscal Year End and the system actually enforces that.

A revision can be submitted prior to acceptance or can be used to submit an amended Cost Report after a file acceptance. The one thing to note is if you already submitted one revision on a given day and the system is no longer letting you can make a request to your MAC via email or mail to have them reject the erroneous Cost Report submission so that you can submit another revision on the same day in case that other revision was not valid for some reason. To be receivable, the FYE for the cost for that you're submitting must be in the past 6 years and must be on or after 12/31/2017. The Fiscal Year End drop down actually dictates that logic and will only show you Fiscal Year End that abide by that rule.

The provider FYB and FYE must exist in STAR, that's that MAC maintain system we talked about earlier, and must match the value of those corresponding values in the ECR file if an ECR file is provided. The provider in FYE specified cannot be locked in STAR. An example of being locked is administratively closed. The provider for that Fiscal Year End cannot be a Subunit and cannot already have a finalized NPR present in STAR for that year. Lastly, any Subunits and Consolidated after FQHC/RHC Units and the ECR file must match those listed in STAR for the family when filing a Full Medical Utilization Cost Report. Please proceed to slide 25.

Next few slides, we'll just cover some additional information. We talked about successfully submitting your submission in MCR eF. We talked about errors and receivability checks that the system does. There's also a couple of instances where you might get a warning. One of those is if you're actually filing your Cost Report after your due date, you will get a warning for that. The other one is if you try to upload a Cost Report or an ECR file generated using outdated ECR vendor software, so if you're not using the most up-to-date version of your Cost Report vendor software.

The timely receipt of your Cost Report will be measured based on 11:59 pm Eastern Time or the providers Cost Report due date. So, anything after the Cost Report due date or after 11:59 pm Eastern Time will be considered late. Files uploaded are not to be encrypted or password protected. This includes ZIP files or any particular file, encrypt is a secure portal for transmission of Cost Report materials and that includes PII and PHI. Another rule in general is duplicate submissions. So that's where you submit the same Cost Report back to back. Those duplicate submission will be rejected by your MAC so such that only the first Cost Report that the MAC receives will actually be processed from there.

And then the first Cost Report received by the MAC, either in MCR eF for mail or hand delivery will be treated as the provider's first Cost Report submission for the year. And so, this, this particular slide at the end has an example of where this is, where this actually is applicable or matters. So, in this example, let's say you mail in your Cost Report, prior to your Cost Report due date. And in that time, your due date has now elapsed, and



you want to submit another Cost Report for whatever reason in MCR eF. So, you log into MCR eF, it's past your due date, and your MAC has not yet received the Cost Report that's been in the mail and is not aware of it.

In this case, if you decide to submit to MCR eF, your Cost Report will be considered late because that's when your MAC will receive that before the mailed in Cost Report and it's past your due date. That's just sort of an example to be wary of to make sure that you're sort of aware of any Cost Report have been mailed in before using MCR eF. Please proceed to slide 26.


Okay, and then effective January 2nd of this year, going forward there's only 2 CMS approved methods of Cost Report submission: that's electronic submission or e-filing via MCR eF, and then physical submission of your Cost Report in the mail or via hand delivery. All Cost Reports for fiscal year ends on or after 12/31/2017 can be e-filed in MCR eF with the following exception that may need to be mailed or hand delivered to your MAC. So, in this exception this essentially any Cost Report that would satisfy CMS' current accessibility criteria, but would not pass the MCR eF systems receivability checks. Those would be required to be mailed or hand delivered.

An example of that is we talked about earlier bundling all of the additional materials and submitting in a ZIP file in the other slot in MCR eF that currently has a file size limit of 300 MB in a one off chance or in a weird scenario where you had to submit, say, 500 MB or a gig that would have to be mailed or hand delivered, because it couldn't be submitted in MCR eF. Lastly, we talked about this a little bit earlier with your keeping EIDM credentials in good standing, but also make sure you submit your Cost Report early. If you do encounter any issues with MCR eF or your EIDM account, those will not be considered valid excuses or reasons to be granted an extension or for being late. Please proceed to slide 27.

Next, we want to talk about electronic signature. The 2018 IPPS final rule, which was issued by CMS in August of 2017 authorizes providers to file with an electronic signature effective for fiscal year ends on or after 12/31/2017. The one thing to note here because there's been some confusion is that the 2018 IPPS final rule does not change who is authorized to sign the Cost Report. So, whoever has been signing the Cost Report that is valid for organizations to continue to do so. In conjunction with the 2018 IPPS final rule, CMS has released new Cost Report transmittals, which support e-signature for the majority of current Cost Report forms.

If you choose to use e-signature and MCR eF, you must use an approved form of electronic signature per the IPPS final rule. And you must upload that via the Signed Certification page in MCR eF. The one sort of exception to note here is if you're filing on the 287-05, which is the current Home Office form. This form does not currently support e-signature. In this case, you need to take a little bit of additional steps here so you can continue to use MCR eF, and upload the Signed Certification page with the electronic signature in the Signed Certification page slot. But you'll also need to mail and or hand deliver a hard copy with a signature signed in ink to your MAC such that's received by your MAC within 10 days of your MCR eF submission. And that's actually your signature in ink in a hard copy. The last thing to note here is that the new Home Office form 287-19 will support e-signature, and the effective date is still TBD on that particular version. Please proceed to slide 28.

This table is handy to reference in the future, but right now used to be out of the 10 Cost Report versions of the current versions all 9 out of 10 of them are e-signature capable where you can leverage the e-signature



capability. And the 287-05, as mentioned before, is currently not e-signature capable. Please proceed to slide 29.

The next few slides, we will discuss valid and invalid uses of electronic signature. This is not an exhaustive list of possible valid and invalid uses of e-signature. So, you'll want to make sure you reference the 2018 IPPS final rule for specifics on e-signature guidance. Please proceed to slide 30.

So, here's an example of a valid use of e-signature. In this case, to have a valid situation with e-signature, you must check the e-signature checkbox, which is denoted around the red box there that must be checked. And then you must validly sign with a first and last name or real name on the signature line. And you can see in this case both of those are done. So, make sure that you're checking that e-signature checkbox and applying signature, a valid signature, on the signature line. This is a valid use of e-signature. Please proceed to slide 31.

Another valid use of e-signature—in this case, the provider or the official at the provider organization has printed the form, had manually in ink checked off the e-signature checkbox, and manually type-written in cursive their signature on the e-signature line. They scanned that into an electronic file and submitted that via MCR eF. This is a valid use of e-signature. Please proceed to the next slide, slide 32.

The next 2 will cover invalid uses of e-signature. In this case, this is an invalid situation because the e-signature checkbox is not checked. So even though a valid signature has been applied on the signature line, the e-signature check box is not checked. So, this is an invalid use of e-signature, and would most likely result in the rejection of your Cost Report by your MAC. So, make sure you check that e-signature checkbox. Please proceed to slide 33.


In this case, the provider has checked the e-signature checkbox, but has not provide a valid first and last name. This is an invalid use of the signature. Please proceed to slide 34.

MCR eF Provider User Experience

Next, we want to talk about the MCR eF provider user experience so far. Please proceed to slide 35.

So, prior to going live back in May of 2018, CMS had 6 provider organizations representing 150 Part A providers that volunteer to test MCR eF. After testing that, they were given a survey to ask on a scale of 1 to 10 how likely they were to use MCR eF once it went live. The average rating of that survey was a 9.7 out of 10. Some of the feedback that CMS received was that it was, the system was very easy to use and understand. The system was quick to show errors and intended results and was an excellent experience. And they were excited and anxious for the system to go live. Please proceed to slide 36.

As I stated before, the system has been live since May 1 of 2018. And in that time, there have been over 19,000 successful submissions from over 3,000 distinctive users in the provider community with a median submission time 2.6 seconds. This is the amount of time it took for the system to process from the moment that user clicks Submit to successfully presenting the confirmation screen. Over 1,200 providers were able to correct errors with their Cost Report prior to submission and without the need of corresponding with their MAC and potentially helping them avoid having their Cost Report be rejected. As I mentioned earlier, receiving



Tentative settlement payments been issued 8 days faster on average for MCReF submissions versus non-MCReF submissions.

And in the last 3 months, over a third of all costs for submissions were e-filed from the MCReF, including over half of the hospital Cost Reports have been submitted via MCReF, and then a few quotes that we received so far from providers: “I’m loving the Cost Report submission season, MCReF is awesome!” “I’m involved in Cost Reporting since 1983. This is the best initiative that — initiative that I’ve seen from CMS to help providers to be more efficient.” Please proceed to slide 37.

Ongoing Outreach and Education

Next, we’ll discuss ongoing outreach and education. Please proceed to slide 38.

Here we have change request 10611, which was issued back in April of 2018. And then the corresponding MLN Matters article. There’s a link there to access that and the specific information about the CR. And there’s some materials attached to that as well. We’ve also now had, including today, 4 webinars. There’s a dedicated CMS website to MCReF, which includes links to how to request user roles within the EIDM, the MCReF User Manual, pertinent MLN articles, and then answers to frequently asked questions. And lastly, an ongoing effort by CMS to update documentation as it relates to MCReF such as the provider reimbursement manual chapters 15-1 and 15-2, and any Cost Report for Transmittal forms that need to be updated to align with e-signature and MCReF. Please proceed to slide 39.

New MCReF Functionality Coming Soon

Lastly, we want to discuss some new MCReF functionality that will be coming in the future. Please proceed to slide 40.


And that new functionality is a dashboard functionality, which allows providers to view their Cost Report submissions and to track them throughout the Cost Report settlement process. It’s not just for MCReF submissions, so even if you submit something in the mail, you would be able to access that via this new proposed dashboard functionality. So be on the lookout for future communications regarding this functionality from CMS. Please proceed to slide 41.

Next we’ll be transitioning into the question and answer portion of today’s MLN Event.

Question & Answer Session

Diane Maupai: Thank you, Patrick. Our experts will now take your questions. Throughout the Q&A session, we will ask you questions about MCReF via the webcast. Remember to disable your pop-up blockers for best results. We’ll begin our session by answering a few questions that we received from webcast participants and will then take questions from the phone. Dorothy please prompt the telephone users and begin to compile the Q&A roster.

Operator: To ask a question, press star followed by the number one on your touchtone phone. To remove yourself from the queue, press the pound key. Remember to pick up your handset before asking your question



to assure clarity. Once your line is open, state your name and organization. Please note your line will remain open during the time you were asking your question. So, anything you say, or any background noise will be heard in the conference. If you have more than one question, press star one to get back into the queue. And we will address additional questions as time permits. Please hold while we compile the Q&A roster.

Diane Maupai: If — our first question from the web is, is there an error listing type and ways to correct the error.

Geoff Kuhn: This is Geoff Kuhn with the System Maintenance team. For all of the errors that can occur in MCR_eF, they're all listed in the user manual as part of a appendices towards the bottom. The user manual itself is available on the dedicated CMS webpage that Patrick mentioned a second ago, as well as from the Help link inside MCR_eF itself. So either of those places you can get the user manual, and within the user manual, there are tables that layout all the different types of errors and warnings you might encounter while using MCR_eF, along with recommendations for the most common ways to resolve those issues, to be able to proceed with your Cost Report upload.

Diane Maupai: Thank you, Geoff. Another question. How do we handle the IRIS disk at the present moment? Are we to send a CD at the moment? What is needed to avoid rejection?

Geoff Kuhn: Regarding IRIS, as long as you're filing through MCR_eF, there's no requirement for you to submit an IRIS diskette separately. You take the IRIS files that are produced by our IRIS vendor software, the M and the A DBF file that we discussed before, you zip those together and do a single ZIP file, and you upload them in the IRIS slot on the MCR_eF submission. And that's it. As long as you're submitting sort of validly formed IRIS files from your IRIS vendor software, and you're putting them in the IRIS slot, then you've taken care of your sort of IRIS filing requirements.

There's no additional requirement to send that separately on a diskette to your MAC or otherwise, if you're filing through the mail, then you would do that however you've done that with IRIS in the past.

Diane Maupai: Okay, thank you. And now we'll take a question from the phone, Dorothy.

Operator: You have a question from the line of Jessica Coyne.


Jessica Coyne: Hi, can you hear me?

Diane Maupai: We can hear you.

Jessica Coyne: Hi. So we have a couple providers that are like Hospice, Palliative Care, so they don't bill Part A but I realized, they don't bill as outpatient, but I realized that they're on the list for eligible for this and I understand that the electronic submission is completely voluntary, but are the submitting Cost Report voluntary? Like is it voluntary in general?

Owen Osaghae: Did you say Hospice?

Jessica Coyne: Yes.



Owen Osaghae: Hospice are required to follow Cost Report.

Jessica Coyne: They are?

Owen Osaghae: Yes.

Jessica Coyne: Okay, that was it. I just wanted to check because like I said they, they're considered outpatient, so I just wanted to be sure.

Diane Maupai: Okay, thank you. We will just take another question from the web. Please revisit what the Print Image is if it is not a PDF file.

Geoff Kuhn: This is Geoff with the System team again. For the Print Image, it's whatever your Cost Report vendor software produces. So, some Cost Report vendors produce it as a PDF, but other Cost Report vendors produce it as a formatted text file, where you would open it in notepad. And it would be laid out to look like a Cost Report, but either way, it's the Print Image produced by your vendor software, whatever format that is with the PI naming convention per the way that the division of Cost Reporting specifies they should be named. That is the Print Image.

So, we're just trying to say generically, it's the human readable one, it's not the electronic one where it's just raw data. It's the thing that looks like a Cost Report and oftentimes, it's a PDF, but it can be a text file, and there's no restriction around that, as long as you're giving us the thing as it was generated by your vendor.

Diane Maupai: Okay, thank you, Geoff. On a printed manually signed signature, and scanned in, do we still have to mail the original copy?


Geoff Kuhn: No for printing, signing, scanning, and sending in the electronic scan of the file that is a valid form of electronic signature per the different couple of examples we went over earlier in the slides. That still takes care of your entire signature requirement. The only time you're required to send in the manual copy - the original copy separately, is when you're using a Cost Report form that does not support electronic signature, which Patrick should remind me the only one remaining is?

Patrick Herrity: Just a Home Office—the 287-05.

Geoff Kuhn: So, for everything it's the Home Office you can sign electronically and then all that's needed is the scan.

Owen Osaghae: Hi, this is Owen Osaghae just to add a little bit for all Cost Report that are e-signature capable, you have to check that e-signature checkbox. So, if you file through MCR eF you are required to e-file that Cost Report, you do not have to mail in your wet signature page.

Diane Maupai: Okay, thanks Owen, one more web question. At what point is the electronic signature applied before encryption?



Geoff Kuhn: This is Geoff with the system maintainer. When you talked about encryption, I'm going to assume that we're talking about the ECR encryption code and the PI encryption codes that are introduced by your vendor. Because for actually uploading to MCR eF, you directed not to additionally encrypt anything. You're not putting as ZIP and you're not encrypting on top of it.

But assuming that we're talking about the encryption that the vendor software itself applies, the signature and the checkbox are not actually stored inside the ECR at present. So, there's no difference as to whether or not you're signing before, after that ECR has been generated. That kind of depends on how your vendor software has been setup. And for the PI, if you are putting in your name electronically just have it typed on there. It can be done before or after so long as it's part of the encryption on the PI that's done is in terms of setting up that file. So, there's no requirement that you do it before you generate the files, just as long as it is the full version that you then sign on top of and scan. That works too.

Diane Maupai: Thanks, Geoff. Are you going to prompt, Dorothy, for any more phone questions?

Operator: As a reminder to ask a question via the phone lines, please press star then the number one on your telephone keypad. That is, star one to ask a question.

Diane Maupai: Thank you Dorothy. And while wait, we'll take another web question. If our other data is over 300, can we send this separately via email?

Geoff Kuhn: The restriction for filing is for the submission as a whole with the other. And the expectation is that when you file through MCR eF, you are sending everything for that submission through MCR eF. If you have more than what can be submitted through MCR eF, in this case more than 300 megs worth of zipped other, then your entire submission needs to be sent through the mail or hand delivered, not split up between the different methods of delivery. One submission sort of one method. I will note that for other we are talking about the compressed size of the file, not the uncompressed size. So if you have 500 or 600 megs of other data, which when you ZIP is less than 300 megs that's fine, but if you have more than 300 megs of compressed other data, your entire submission should go through the mail or hand delivery.

Crosstalk


Diane Maupai: Do we need to confer?

Okay, thank you, Geoff. Let's take a question from the phone.

Operator: Your next question comes from the line of Nicole Moscatelli.

Nicole Moscatelli: Hi, we're new as an FQHC provider facility. So, my question is, are we required to have a specific vendor software to do the completion of the Cost Report?

Owen Osaghae: Hi, this is Owen Osaghae. You can select whichever vendor software I guess your organization prefers. There are several out there. So, we do not, we do not recommend any specific vendor, is that right?



Nicole Moscatelli: My guess it's more generic. Do we have to have a software to submit the Cost Report or is it something that we can complete with the assistance of a consultant and completed in a PDF format and submitted through MCR eF.

Owen Osaghae: No, there's Cost Report electronic form for the accuracy, which will have validation and edits in it. You have to use the Cost Report VCR format not PDF.

Nicole Moscatelli: Okay. Thank you.

Diane Maupai: Thank you. Do I need to register separately to follow the Cost Report online?

Geoff Kuhn: This is Geoff again. If you are registered for PS&R as a PS&R user, you already have an EIDM account and credentials. If you are the security official, you automatically also have access to file in MCR eF. If you're a PS&R user there, you've been granted access to PS&R by a security official. And you want to be able to file an MCR eF for that same provider, you would need to go into the EIDM and additionally request the MCR eF Authorized Filer role. If you aren't registered for PS&R at all, you do not have a current EIDM account, then you would need to both set up the account and obtain the MCR eF authorized role in order to file the Cost Report in MCR eF.

Diane Maupai: Thank you. Our next question is if a facility's Cost Report shows a payable to CMS, is it preferred that they send a check after electronically filing or should they let the payment be withheld from future payments? Some providers have experienced concern that the check will not be processed, and the amount will also be withheld.

Owen Osaghae: Hi, this is Owen Osaghae from CMS. You are required to send in your check to whatever address is designated by your MAC. The MACs, I know there's been some issues about MACs not been aware that a check was mailed and were holding your payment. We are working to resolve that issue, but the expectation is you need to mail in your check with the amount owed on the Cost Report.


Diane Maupai: Thank you Owen. Is there a best browser to use with MCR eF?

Geoff Kuhn: This is Geoff. We're currently set up to work with Internet Explorer, Chrome, and Firefox, correct? I think all of them are equally compatible. There is not one that primarily works better than another. I would say Internet Explorer, though not the current version of Microsoft Edge.

Diane Maupai: Thank you. Our total IRIS A&M file is greater than 1 megabyte, is the restriction in total or individual file?

Geoff Kuhn: The restriction is on the total ZIP file, so those two things combined and then zipped. So if the ZIP as a whole is larger than 1 Meg, then that would exceed the limitation in MCR eF. Our understanding is that that should be very rare. So, you might be in a boat where you have a large amount of data. And if that's something that we see regularly, you can talk to your MAC, and we can consider revising those limits.

Diane Maupai: Thank you. Should files be uploaded as ZIP files and if so, is there a standard ZIP program that should be used?



Geoff Kuhn: There are specific slots within MCR_eF, which expect files to be zipped. There are specific slots that expect things not to be zipped. So the ECR slot itself should never be zipped, but the IRIS files or other should always be zipped. That specification is in the previous slides as to which slots should and should not be zipped. And then as information is also in the user manual. In terms of standard software for zipping, as long as it is a standard ZIP file, it can be created by PK ZIP or Win ZIP or anyone else who's just providing a standardized ZIP format, that's sufficient.

Diane Maupai: Thank you. Can you repeat the requirement on Home Office? Is that mail the Home Office before 10 days of due date? And also, do submit online? I'm sure you can translate that.

Geoff Kuhn: For the Home Office as I believe this is in reference to the requirement to submit the original copy of the signature. That is, you file online and you need to have your signature sent in within 10 days of that, so that the MAC has the online filing and then they receive their original copy of the signature in the mail within 10 days, they can say this is a whole valid submission. If you take longer than that to submit your signature, then they may reject your submission for being incomplete. So it's not a matter of sending in the signature and then waiting 10 days or doing the one and then wait 10 days, it's really do them both at the same time. The MAC needs to get the other one within 10 days to consider it a whole submission.

Diane Maupai: Thank you. For a Skilled Nursing Facility, who is required to sign the Cost Report for Skilled Nursing Facility, the Administrator, the CFO or either?


Owen Osaghae: This is Owen Osaghae with CMS. The requirement for who signs the signature does not change when filing through MCR_eF. I think there is a definition of who can sign a Cost Report. If you look at the Cost Report instruction, I believe it's either the CFO or Administrator can sign it. I'm not sure by the order. You can refer back to the Cost Report instruction.

Diane Maupai: Thank you. Is there a way to validate the new uploading process before our initial filing that everything is working correctly?

Geoff Kuhn: This is Geoff with the System team. There's no pre-vetting process that you can do. I think our general recommendation is not to wait to the last minute to try and click Submit, have your whole submission together. Try to go through and submit and whatever errors you receive those are the things that you need to work to resolve. All the errors that can happen are in there as we talked earlier. They're laid out in the user manual with guidance for how to work around them or how to resolve them. So as long as you have your documentation together and you can go in a bit before your deadline and attempt that submission, if there are issues that should give you time to resolve it. But no, there is no pre-vetting process other than attempting to submit and resolving the errors you receive.

Diane Maupai: Thank you. How do you change the Security Official for an organization?

Geoff Kuhn: I'm not entirely certain about the exact details of that. The best thing to do is to contact the End User Services Help Desk EUS. They provide the end user support for MCR_eF and PS&R through EIDM system. They have an entire process that they can walk you through in terms of having a Security Official doing a promotion of an alternate person. One thing that I will recommend for any organization with Security



Officials, you can significantly simplify that process by having backup security officials registered with your organization. If you have backup Security Officials in place, and your current Security Official leaves the company or retires or otherwise, then it's much simpler to make that swap and promote one of the existing backups to the Security Official role. It's still feasible if you don't have backup Security Officials, it's just a bit more involved and time consuming.

Diane Maupai: And I'd like to point you to slide 42 which has information for the EUS Helpdesk. Can you file No or Low utilization in MCR eF since you do not have an electronic filing?

Geoff Kuhn: Yes, you can. On the main page, you select what level of Medicare utilization you're filing for: Full, Low, or No. And based on that selection, the required fields and the validations around it are updated to reflect that if you're filing no utilization, then no ECR is expected, but I believe the Print Image or the signed signature page is still expected to sort of, for you to state here is that I had no new utilization, here's my signature attesting to that fact. So, the system is set up to support those. And you will see that the requirements for what files to include update to reflect based on your selection of Medicare Utilization.

Diane Maupai: Okay, thank you. I'm currently set up as a PS&R user, but I'm not finding where to request access to MCR eF on the EIDM website. Any suggestions?

Geoff Kuhn: Sure. The trickiest part is that MCR eF is part of the PS&R application within the EIDM interface. So, when you're going to request a new role, you're not going to find a separate, like, MCR eF box sitting somewhere else. You're going to be looking for the PS&R MCR eF application. And within that, you're going to say I want to add a new role in addition to my existing PS&R roles. And within that set of drop down, you will then see that MCR eF Authorized Filer is one of the things that you can select in addition to PS&R User or PS&R Admin User.


Diane Maupai: Thank you. We are a chain home. If we submit one SNF Cost Report in MCR eF, are we required to submit all in MCR eF?

Geoff Kuhn: No, there's no current requirement that you submit all Cost Reports one way or the other that even goes for a single provider. So, you can submit yours as filed through MCR eF and submit an amendment via the mail or vice versa. If you have multiple SNFs that are part of a chain, submit some of them through MCR eF and others through the mail. Whatever means works best for you is available as long as you're either submitting the whole thing for that one provider through the mail or submitting that whole thing for that one provider through MCR eF.

Diane Maupai: Okay, thank you. Are Cost Reports' due dates standard or agency provider specific?

Owen Osaghae: This is Owen Osaghae. Cost Reports are due 5 months after the Cost Reporting year, after the FYE that Fiscal Year End of that Cost Reporting year or 150 days after the end of the Cost Report if the end of the fiscal year does not fall on the last day of the month. So, there is a specific time where your Cost Report is due.

Diane Maupai: Okay, thank you. We have more one more web question. So, you now have an opportunity to submit questions if you'd like to. Little prompt there. Here's our last question. So far, we're an MCR eF



Approved Cost Report Filer. Some of our facilities are not listed for us to request access. What steps should be taken to have them pull up in the organization search?

Geoff Kuhn: This is Geoff. Since we're talking about organization search, I'm assuming that we're talking about the EIDM interface where you're requesting to associate to an organization. There's a couple different things to look out for there. One is confirming that the organization in question has itself been registered and signed up. So, not all Medicare Part A facilities have registered themselves in the EIDM. So they will not all be in the search for you to associate to, that would be a matter of working with the organization themselves making sure that they have a Security Official on file, that they have registered their organization, that's also necessary so that there's someone there to approve your request. If they have not registered, there's no one to approve your association to their organization.

The other thing is if they are certain that they've registered, then it may be a matter of how they're, how they're organized or whether or not they've registered in the name you're expecting and so that comes down to also communicating with the Security Officials of the organization in question making sure that you're looking for your organization the way that they've listed themselves. And if you are still unable to find that link, you know the Security Official is there, you know they're registered, but you still can't find them, then I would direct you to reach out to EUS with the organization details that you have and ask them to help you identify why you're not able to find it within the organization search.

Diane Maupai: Okay, thank you. Medicare utilization options for Full, Low, and No, what do these mean?


Owen Osaghae: Hi, this is Owen. Low utilization means of each, let me just go back to second. Each MAC sets a threshold for what, for when they expect a provider to file a Full Cost Report and if your Medicare reimbursement, your Medicare cost is below that threshold you are allowed to file a Low Utilization Cost Report. And when you are above that threshold the expectation is you will file the Full Medicare Cost Report. Under the Low Utilization Cost Report, not all the worksheets are required to be filed. There are specific worksheets you need to file for the utilization. And as Geoff mentioned earlier, one is a No Utilization, which means there's no Medicare costs involved. All you need to do is sign that signature page indicating that there are no Medicare reimbursable costs incurred for that fiscal year. Hope that answers your question.

Diane Maupai: Okay, thank you Owen. We're going to take one minute to confer and we'll be right back. All right, so why did CMS only include Part A in the software? Will Part B ever be added?

Geoff Kuhn: One thing we can clarify there is that the MCR eF does support the outpatient facilities that's filed as part of inpatient Medicare Part A. So, we're talking earlier about SNFs and HHAs, those are, you know, Medicare Part B of A, they're still included, but MCR eF is only for those that are filing Cost Reports through the Medicare Part A like Cost Report process. So just keep in mind that we do support outpatient facilities that are filing their Medicare like Part A Cost Report,

Owen Osaghae: B of A.

Geoff Kuhn: B of A.



Diane Maupai: Thank you. Does this webinar provide CPE? If you go to our call and webinar webpage, which is go.cms.gov/npc, that's go.cms.gov/npc, you will see there's a tab for CPE or no, that's exact title, and it will show the names of the associations that accept our calls and webcast for credit.

When will providers be able to electronically file their Cost Report with the MAC using the vendors Software HFS KPMG, similar to how individuals can send their tax return to the IRS using H&R block or Turbo Tax?

Owen Osaghae: Hi this is Owen again. This is one of the options we have considered, but there's no decision as to if this is a possibility because there are other things we have to consider before we can do this. It's one of the options that the vendors have proposed. We are still assessing to see if it is a viable option for us.

Diane Maupai: Okay, thank you. Where would I find an approved vendor list for software?

Geoff Kuhn: This is Geoff. I think the best person to go through the information would be your MAC for each of the provider-like entities that they work with. The different types of facilities all have different softwares that are applicable for their Cost Report versions. They each maintain a listing of the current approved vendors. Maybe you reach out to them or you go to their websites. You should be able to find that information.

Diane Maupai: Okay, thank you. If an amount is owed, does the check need to be postmarked on the due date?

Owen Osaghae: Hi this is Owen. I would say, yes you should send in your checks when you're filing your Cost Reports through MCR eF because the MAC may end up recouping your payments, if your check is not received on a timely basis.

Additional Information

Diane Maupai: Okay, thank you. That's all the questions we have today. So, if you have any additional questions, you can see there are resources on slide 38 and the contacts on slide 42. On slide 43, you'll find information on how to evaluate your experience with today's event. We will also push out the link to the evaluation to our webcast participants right now. Evaluations are anonymous, confidential, and voluntary. We hope you'll take a few minutes to evaluate your experience with today's event. As a reminder, disable your pop-up blocker for best results. An audio recording and transcript will be available in about two weeks on our call site, which is go.cms.gov/npc. I'd like to thank our presenters Patrick and Owen and everyone who joined us for today's Medicare Learning Network Event, Submitting Your Medicare Part A Cost Report Electronically. Have a great day.

Operator: Thank you for participating in today's conference call. You may now disconnect. Presenters please hold.