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DATE: December 10, 2018

TO: All Medicare Advantage Organizations

FROM: Jennifer R. Shapiro, Acting Director, Medicare Plan Payment Group

SUBJECT: Updates to the Risk Adjustment Suite of Systems (RASS) for Delete Transactions using a Beneficiary Identifier

Background

The Centers for Medicare & Medicaid Services (CMS) began the process of issuing new Medicare Cards with Medicare Beneficiary Identifiers (MBI) to Medicare beneficiaries on April 1, 2018. On December 22, 2017, CMS released a Health Plan Management System (HPMS) memorandum titled “Updates to the Encounter Data System and Risk Adjustment Suite of Systems to Accommodate the New Medicare Card Project.” In the memorandum, details were provided on how the Encounter Data System (EDS) and the RASS, specifically the Risk Adjustment Processing System (RAPS) will handle transactions submitted with the MBI. This memorandum provides information on an enhancement to the RAPS processes for delete transactions with the MBI. This change only applies to RAPS, as EDS already has the capability to accept any beneficiary identifier type, regardless of the identifier submitted on the original transaction.

Beneficiary Identifier Updates

Previously, RAPS-based delete transactions required plans to submit deletes with the same beneficiary identifier that was submitted on the original add transaction. This logic applied to instances in which plans were submitting deletes which were submitted using a Health Insurance Claim Number (HICN) or the Railroad Board Number (RRB) at the time of original submission.

Starting on January 8, 2019, RAPS will accept either the MBI, HICN, or RRB where applicable on delete transactions regardless of which beneficiary identifier was submitted on the original add transaction. This functionality will impact all incoming transactions regardless of when the original add was submitted.

This enhancement to the RAPS will allow for the scenarios shown in Table 1:

Table 1. Possible Scenarios for Beneficiary Identifiers

Initial Add Transaction Beneficiary Identifier	Delete Transaction Beneficiary Identifier
HICN	HICN
HICN	MBI
RRB	RRB
RRB	MBI
MBI	HICN
MBI	MBI
MBI	RRB where applicable

RAPS will be able to apply these scenarios to the seven most current identifiers associated with a beneficiary. It is very unusual for a beneficiary to have more than seven changes to an identifier, but if this occurs, then the plan must submit the beneficiary identifier that was on the original add transaction. When there are more than seven changes to an identifier, the 490 error code will be generated. The 490 error code message will state “Could not delete; Diagnosis Cluster not in RAPS Database Beneficiary Record.”

Questions related to the implementation of this enhancement can be emailed to riskadjustment@cms.hhs.gov. Please specify “Updates to the RASS for Delete Transactions using a Beneficiary Identifier” in the subject line.