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**DATE:** October 17, 2018

**TO:** All Medicare Advantage Organizations, Cost Plans, Medicare Medicaid Plans, and PACE Organizations

**FROM:** Jennifer Harlow /s/  
Deputy Director, Medicare Plan Payment Group

**SUBJECT: Proposed Updates to Encounter Data Report Cards – For Comment**

The purpose of this memo is to seek comment about proposed updates to the encounter data report cards. As part of our efforts to assist organizations in submitting complete and accurate data, CMS began distributing encounter data report cards in September 2015. Over the past 3 years, CMS has changed the format, content, and reporting frequency of the report cards based on feedback from stakeholders.

At this time, CMS is considering making additional changes to the format and content of the encounter data report cards based on feedback we have received through site visits and inquiries in the mailboxes. This memo presents a proposed re-design of the encounter data report cards and seeks input from stakeholders. We recommend reviewing this memo in conjunction with the report card prototype file that is attached to this memo.

CMS is considering four major changes to the content and format of the report cards:

- 1) Move to machine-readable data table formats for all sections (like the current Section 508 compliant versions). Many MAOs have reported that they read the data into their own systems and that machine readable formats would reduce burden.
- 2) Continue Section 1 on a quarterly basis, with various changes, including
  - Delete submission frequency by quarter
  - Add information on top 5 edits at the 277 level of editing in the front-end and the back-end edits (reflected in MAO-002 reports).
- 3) Add a new Section 2 (made up of several tabs) to provide a data exchange to enable improved reporting of key data fields. The data exchange summary tab would provide the volume of records with invalid or missing data in the following data fields: beneficiary ID, billing NPI, diagnosis code, procedure code, service from date, service

through date, referring NPI, place of service. In each subsequent tab (one per data field), we would provide the ICN and submission date for records with invalid or missing data. While the EDS does have edits in place to ensure the population of these fields with valid values, we conduct additional analyses to catch instances in which invalid values may have gotten through the system.

- 4) Provide volume of records submitted by type of service (currently Sections 2 through 4) in a new Section 3. Present streamlined machine-readable data format only.
- 5) Create a new Section 4 that would change each quarter. For example, CMS might provide the no-pay analysis in the first quarter and a different analysis in the second quarter, etc.

**Table 1. Proposed Changes to Encounter Data Report Card *Current* Section 1 – “Submission Report”**

<b>Current Report Card</b>	<b>Proposed Change</b>
Measure: Submission frequency of encounter data by quarter	Delete this information
Measure: Acceptance and rejection rate of submissions (the header and line level)	Provide separately for encounter data records and chart review records
Measure: Volume measured as submissions per 1,000 beneficiaries	Volume measured as submissions per beneficiary
	<b>New Measure:</b> Volume of Top 5 back-end edits, separate tab “Section 1 Top Edits”
	<b>New Measure:</b> Volume of Top 5 277CA-level front-end edits, separate tab “Section 1 Top Edits”
Benchmark: Average by contract size	Benchmark: Average by contract size and contract type
Analysis Timeframe: Quarterly	No Change Proposed
Reporting Timeframe: Quarterly	No Change Proposed
Format: Data tables with title rows for separating sections, etc.	Format: Machine-readable data tables (as in 508 compliant version)

The current Sections 2, 3, and 4 would be revised to remove the bar graphs (currently shown in Sections 2 and 3) and present only the data table (currently Section 4 - see description in Table 2b below) in a new Section 3.

**Table 2. Proposed Changes to Encounter Data Report Cards Current Section 2 – Overall “Encounter Data Submissions”**

<b>Current Report Card</b>	<b>Proposed Change</b>
Measure: Overall volume of submissions	Provide separately for encounter data records and chart review records
Measure: Volume measured as submissions per 1,000 beneficiaries	Volume measured as submissions per beneficiary
Benchmark: Average submission volume for all contracts by MA region, all contracts nationally, FFS in MA region, and FFS nationally	Benchmark: Average submission for contracts nationally, all contracts by MA region and all contracts by MA region/contract type/contract size
Analysis Timeframe: Annual (Year of Service)	No Change Proposed
Reporting Timeframe: Quarterly	Reporting Timeframe: Present in new Section 3
Format: Bar Graphs	Format: Provide data table only as in current Section 4, but transpose columns and rows; machine-readable format as in 508 version

**Table 2a. Proposed Changes to Encounter Data Report Cards Current Section 3 – “Encounter Data Submissions by Service Type”**

<b>Current Report Card</b>	<b>Proposed Change</b>
Measure: Volume of submissions by service type (professional, inpatient, outpatient, DME)	Provide separately for encounter data records and chart review records
Measure: Volume measured as submissions per 1,000 beneficiaries	Volume measured as submissions per beneficiary
Benchmark: Average submission volume for all contracts by MA region, all contracts nationally, FFS in MA region, and FFS nationally	Benchmark: Average submission for contracts nationally, all contracts by MA region and all contracts by MA region/contract type/contract size
Analysis Timeframe: Annual (Year of Service)	No Change Proposed
Reporting Timeframe: Quarterly	Reporting Timeframe: Present in new Section 3
Format: Bar Graphs	Format: Provide data table only as in current Section 4, but transpose columns and rows; machine-readable format as in 508 version

**Table 2b. Proposed Changes to Encounter Data Report Cards *Current* Section 4 – “Contract Data Used in Sections 2 and 3”**

<b>Current Report Card</b>	<b>Proposed Change</b>
Measure: Overall volume of submissions and volume of submissions by type of service (professional, inpatient, outpatient, DME)	Provide separately for encounter data records and chart review records
Measure: Volume measured as submissions per 1,000 beneficiaries	Volume measured as submissions per beneficiary
Benchmark: Average submission volume for all contracts by MA region, all contracts nationally, FFS in MA region, and FFS nationally	Benchmark: Average submission for contracts nationally, all contracts by MA region and all contracts by MA region/contract type/contract size
Analysis Timeframe: Annual (Year of Service)	No Change Proposed
Reporting Timeframe: Quarterly	Reporting Timeframe: Present in new Section 3
Format: Data tables with title rows for separating sections, etc.	Format: Transpose columns and rows; machine-readable format as in 508 version

The current sections 5 and 6 would be presented as a machine-readable data table and be provided as a special report on an annual basis. On a rotating basis, other analyses under development might also be provided in the new Section 4 as they are developed and finalized.

**Table 3. Proposed Changes to Encounter Data Report Cards *Current* Sections 5 and 6 – “Analysis of Inpatient Encounter Data and FFS No-Pay Claims”**

<b>Current Report Card</b>	<b>Proposed Change</b>
Measure: Match Rates of Inpatient Encounter Data and FFS No-Pay Claims	No Change Proposed
Analysis Timeframe: Annual (Year of Service)	No Change Proposed
Reporting Timeframe: Quarterly	Reporting Timeframe: Present in new Section 4 on an annual basis
Format: Data table with title rows for separating sections, etc.	Format: Machine-readable format as in 508 version

CMS is seeking feedback on the proposed changes to the report card and is interested in understanding the lead time required by MAOs to adjust programs to accommodate changes. Please submit feedback by November 19, 2018 to [encounterdata@cms.hhs.gov](mailto:encounterdata@cms.hhs.gov) and include “Proposed Updates to Encounter Data Report Cards” in the subject line of the email.

CMS will send an HPMS memo and report card prototype summarizing the adopted changes and provide a timeline for the new reports in early 2019.