

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
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CENTER FOR MEDICARE

DATE: August 19, 2019

TO: All Medicare Advantage, Cost, PACE, and Demonstration Organizations Systems Staff

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

SUBJECT: Medicare Advantage Encounter Data Submission Performance Reports – August 2019

In both the 2018 and 2019 Medicare Advantage and Part D Rate Announcement and Call Letters, CMS set forth our approach to implementing encounter data submission performance metrics. CMS also provided information on November 1, 2017 in an HPMS memo describing the metrics and thresholds and soliciting feedback from stakeholders. We additionally provided contract-specific submission performance reports at that time. On August 20, 2018 CMS issued a Health Plan Management System (HPMS) memo finalizing encounter data submission performance metrics and thresholds.

The purpose of this memo is to announce the availability of an updated set of submission performance reports that will inform the compliance process. The reports are being sent to notify Medicare Advantage Organizations (MAOs) of their current status for each metric. CMS will send additional communication to outlier contracts for this initial release of the reports.

All performance measures and thresholds are at the contract level. Contract-specific information, showing performance for each metric and technical notes with detailed specifications on each metric and threshold are available via the Encounter Data Report Card link on the HPMS portal:

HPMS Home Page > Risk Adjustment > Encounter Data > Submission Performance Report

The reference period for each metric is provided here in Table 1. This information, in addition to more detailed specifications for each metric and threshold, are available in the technical notes that can be downloaded from the same location as the submission performance reports.

Table 1. Reference Periods & Encounter Data Used for Encounter Data Submission Performance Metrics

MEASURE	TIMEFRAME	ED DATA INCLUDED
O1: Failure to Complete End-to-End Testing and Certification	May 1, 2018	Not Applicable
O2: Failure to Submit Any Accepted Encounter Data Record to the Encounter Data System	Submission Year 2018	Final Action Encounter Data Records and Chart Review Records
O3: Excessive Submission of Encounter Data Records at End of Risk Adjustment Submission Window	Service Year 2017 December 1, 2018 – January 31 2019	Final Action Encounter Data Records and Chart Review Records
C1: Extremely Low Volume of Overall Encounter Data Records	Service Year 2017	Final Action Encounter Data Records and Chart Review Records
C2: Extremely Low Volume of Inpatient Encounter Data Records	Service Year 2017	Final Action Encounter Data Records and Chart Review Records
C3: Extremely low volume of professional encounter data records	Service Year 2017	Final Action Encounter Data Records and Chart Review Records
C4: Extremely low volume of outpatient encounter data records	Service Year 2017	Final Action Encounter Data Records and Chart Review Records

Under 42 C.F.R. § 422.310, Medicare Advantage Organizations (MAOs) and other entities under Part C rules are required to submit encounter data for each item and service provided to an MA enrollee. As required under § 422.310(b): Each MA organization must submit to CMS (in accordance with CMS instructions) the data necessary to characterize the context and purposes of each item and service provided to a Medicare enrollee by a provider, supplier, physician, or other practitioner. Additionally under § 422.310(d): MA organizations must submit data that conform to CMS' requirements for data equivalent to Medicare fee-for-service data, when appropriate, and to all relevant national standards. In addition, at § 422.504(l), CMS requires

MAOs to certify to the accuracy, completeness, and truthfulness of their encounter data (based on best knowledge, information, and belief).

CMS is providing the submission performance reports and technical notes in order to provide submitters with the opportunity to review and improve submission processes. Please submit comments or questions to EncounterData@cms.hhs.gov. Please reference “Encounter Data Submission Performance Reports – August 2019” and your contract ID in the subject line of the email.