

HHS-RADV File Validation Checks Overview

October 25, 2017

**Health Insurance Marketplace Program
Training Series**

Session Agenda

- Session Guidelines
- Intended Audience
- Session Purpose
- HHS-RADV Timeline
- File Validation Checks Overview
 - Data Entry Clarification
 - Overview of IVA Entity Audit Results Submission (XML)
 - XML Validation Check Report
 - IVA Findings Report
- Resources
- Closing Remarks

Session Guidelines

- This is a 60-minute webinar session.
- For questions regarding logistics and registration, please contact the Registrar at: (800) 257-9520.

Intended Audience

- Issuers of on-Exchange* and off-Exchange individual and small group plans, in states where the Department of Health and Human Services (HHS) operates the Risk Adjustment (RA) program under the Patient Protection and Affordable Care Act (PPACA)
- Prospective and contracted Initial Validation Audit (IVA) Entities
- Third Party Administrators (TPA) and support vendors
- Second Validation Audit (SVA) Entity

* This includes state-based, Federally-facilitated, and Small Business Health Options Programs (SHOP).

Session Purpose

- This presentation will provide information on validation checks, errors, and warnings produced by the Audit Tool, as a result of submitting the IVA Entity Audit Results Submission (XML) in accordance with the Interface Control Document (ICD).
- This presentation is intended to supplement both the RADV IVA Submission Files ICD and the HHS-RADV Protocols.
 - The ICD defines all data elements and restrictions for data entry, along with validations executed by the Audit Tool.
 - The HHS-RADV Protocols details IVA Entity requirements for audit execution and procedural steps that must be performed.

HHS-RADV Timeline

HHS-RADV Timeline



To access the most current HHS-RADV Timeline for the 2016 benefit year, please refer to the REGTAP Library under the HHS-Operated Risk Adjustment Data Validation (RADV) program:

[HHS-RADV Timeline for the 2016 benefit year](#)

IVA Entity Audit Results Submission (XML) – Data Entry Clarification

IVA Entity Audit Results Submission (XML) – Data Entry Clarification

- Data Entry Clarification – ‘seniorCoderDiagnosisCode’ tag.
- The ‘seniorCoderDiagnosisCode’ tag should be left blank for medical records which were not reviewed by a Senior Coder.
- In the event a medical record is reviewed by a Senior Coder and no diagnoses are identified by the Senior Coder, the value “No Sr Diag” should be recorded in the ‘seniorCoderDiagnosisCode’ tag.
 - This update is reflected in the 10/20 IVA Results Submission (XML) Data Elements Job Aid located in the Audit Tool library.

Overview of IVA Entity Audit Results Submission (XML) File Validation Checks

Overview of File Validation Checks

- Validation checks are automated checks that the Audit Tool conducts after the IVA Entity uploads the IVA Entity Audit Results Submission (XML), Package 1, and Package 2 to the Audit Tool.
 - This presentation will focus on the IVA Entity Audit Results Submission (XML) validation checks.
- The list of the automated validation checks the Audit Tool performs on the submitted IVA documentation can be found in the HHS-RADV IVA Submission Files ICD.
- This presentation will discuss **XML Validation Check Report** errors and **IVA Findings Report** warnings resulting from the file validation checks.

Overview of File Validation Checks

(continued)

- The purpose of performing file validation checks is to:
 - Facilitate the submission of complete and accurate data that correctly reflects IVA Entity Audit Results;
 - Assist in reducing errors that can potentially impact risk score findings;
 - Confirm that all enrollees selected in the IVA Sample are accurately documented within the IVA Entity Audit Results Submission (XML);
 - Enable a consistent comparison between enrollee data from the RADV Sampling Reports and findings documented in the IVA Entity Audit Results Submission (XML); and
 - Assist the IVA Entity in remediating significant issues that may impact risk score findings, and to provide information on error messages.

Types of Validation Checks

There are four (4) types of data validation checks that will be performed by the Audit Tool:

- **Required Checks**

- Verifies that the XML element value is provided for required and situational fields as outlined in the ICD.

- **Validity Checks**

- Verifies that the XML element value conforms to the specified data type and restrictions.

- **Logical Checks**

- Verifies the XML element value meets the specified business logic as outlined in the ICD.

- **Referential Validation Checks**

- Verifies that the XML element value conforms to the data in the RADV Sampling Files.

XML Validation Check Report – File Validation Checks

XML Validation Check Report – File Validation Checks

- The validation checks are executed once the IVA Entity Audit Results Submission (XML) is submitted to the Audit Tool.
- Following the upload of the IVA Entity Audit Results Submission (XML) to the Audit Tool, IVA Entities receive the **XML Validation Check Report**.
 - The **XML Validation Check Report** contains the results of the following validations performed by the Audit Tool:
 - Validates required fields in the IVA Entity Audit Results Submission (XML) are populated;
 - Validates that fields in the IVA Entity Audit Results Submission (XML) adhere to the CMS-specified formatting guidance;
 - Validates that the fields in the IVA Entity Audit Results Submission (XML) adhere to the business rules defined in the ICD; and
 - Validates that the Unique Enrollee ID and the RADV MCE Linked Claim ID match data within the RADV Reports.

XML Validation Check Report – File Validation Checks (continued)

XML Validation Check Report Errors:

- If errors result from the validation checks performed, the **XML Validation Check Report** will provide an error message: 'Fatal Error' or 'Critical Error'.
 - **Fatal Errors**
 - Generated when a file fails to conform to the specified file layout and data element value restrictions. As a result, the file is either not machine readable or records are not able to be loaded into the database given the data type restrictions indicated in the ICD.
 - **Critical Errors**
 - Generated when the data submitted in a file fails to conform to data element restrictions, fails a business or logical validation, or presents a unique ID that is unable to map to RADV Sample Reports data.



NOTE: All Fatal and Critical Errors require remediation and resubmission of the IVA Entity Audit Results Submission (XML).

XML Validation Check Report – File Validation Checks (continued)

XML Validation Check Report – Outcomes and Required Actions:

- **Errors Present**

- If the XML Validation Check Report contains Fatal Errors or Critical Errors, then the IVA Entity Audit Results Submission XML file is rejected and is not processed further. The IVA Entity must correct the XML file and resubmit.

- **No Errors Present**

- If the XML Validation Check (XML) does not contain any Critical Errors, then the Audit Tool will continue processing the IVA Entity Audit Results Submission XML and will produce the IVA Findings Report.

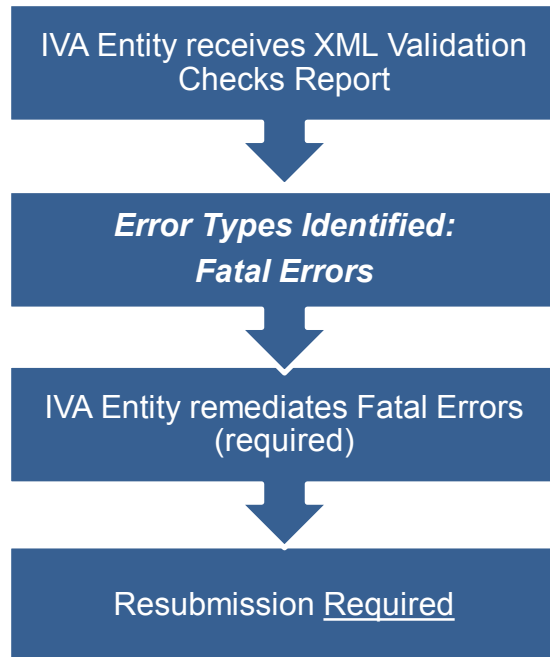


NOTE: The IVA Entity will not be able to progress through the IVA Submission Process until a valid IVA Entity Audit Results Submission (XML) is received and processed by the HHS-RADV Audit Tool free of Fatal or Critical Errors.

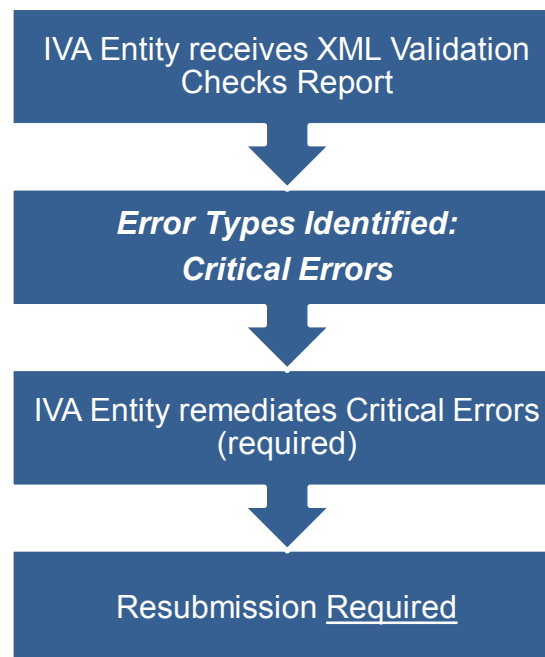
XML Validation Check Report – File Validation Checks (continued)

XML Validation Check Report Potential Error Outcomes

Fatal Errors



Critical Errors



- The XML Validation Check Report will only indicate Fatal and Critical Errors that must be remediated and resubmitted before the IVA Findings Report is available.

Example of a Fatal Error

XML Validation Check Report Fatal Error – Example:

```
<enrErrResponseItem>  
  <responseType>Fatal Error</responseType>  
  <dataElement>gender</dataElement>  
  <valueProvided>J</valueProvided>  
  <responseCode>1.2.8</responseCode>  
  <responseMessage>Incorrect field format.</responseMessage>
```

- In this **XML Validation Check Report** example, a Fatal Error is indicated in the 'responseType' tag.
 - The tag 'dataElement' indicates the data element causing the error, in this case 'gender'.
 - The tag 'responseMessage' provides the error message explaining the reason for the error. In this example, 'Incorrect field format.'
- **Resolution** → The IVA Entity must correct the enrollee's 'gender' on the IVA Entity Audit Results Submission (XML) to adhere to the correct field format and resubmit.
 - Example: J → M, F, or U



See *Appendix E: Error Codes/Response Messages* in the ICD for additional information on the 'responseCode' indicated on the **XML Validation Check Report**.

Example of Critical Errors

XML Validation Check Report Critical Errors – Examples:

```
<mrResponseItem>  
  <responseType>Critical Error</responseType>  
  <dataElement>radvmceLinkedClaimId</dataElement>  
  <valueProvided>01234CL10021</valueProvided>  
  <responseCode>3.3.1</responseCode>  
  <responseMessage>No Claim ID match found.</responseMessage>
```

- In this **XML Validation Check Report** example, a Critical Error is indicated in the 'responseType' tag.
 - The tag 'dataElement' indicates the data element causing the error. In this example, 'radvmceLinkedClaimId'.
 - The tag 'responseMessage' provides the error message explaining the reason for the error. In this case 'No Claim ID match found' when comparing the submitted value against the RADVMCE Report.
- **Resolution** → The IVA Entity must populate the 'radvmceLinkedClaimId' tag with an appropriate Claim ID on the RADVMCE Report and resubmit the IVA Entity Audit Results Submission (XML).

Example of Critical Errors (continued)

XML Validation Check Report Critical Errors – Examples:

```
<docResponseItem>  
  <responseType>Critical Error</responseType>  
  <dataElement>fileName</dataElement>  
  <valueProvided>010374CKT_other.pdf</valueProvided>  
  <responseCode>5.5.2</responseCode>  
  <responseMessage>Duplicate file name.</responseMessage>
```

- In this **XML Validation Check Report** example, a Critical Error is indicated in the 'responseType' tag.
 - The tag 'dataElement' indicates the data element causing the error, 'fileName'.
 - The tag 'responseMessage' provides the error message explaining the reason for the error. In this case a 'Duplicate file name' exists in the IVA Entity Audit Results Submission (XML).
- **Resolution** → The IVA Entity must include a unique file name within the IVA Entity Audit Results Submission (XML).

IVA Findings Report – File Validation Checks

IVA Findings Report

- The **IVA Findings Report** is generated following the successful submission of the IVA Entity Audit Results Submission (XML) with no Fatal Errors or Critical Errors identified on the **XML Validation Check Report**.
- The **IVA Findings Report** will include warning messages identified during file processing, enrollee level summary counts, and enrollee risk scores based on IVA findings.

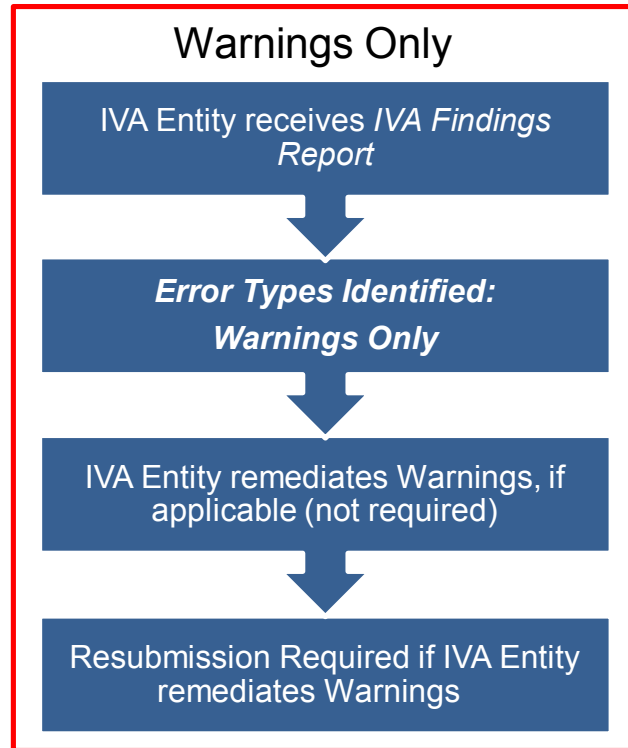
IVA Findings Report – Warnings

IVA Findings Report Warnings:

- Provide notification that information provided in the IVA Entity Audit Results Submission (XML) may be incorrect or invalid for a given situation, but warnings do not prevent the IVA Entity or issuer from advancing through the IVA Submission Process.
 - The **IVA Findings Report** may include warning messages which indicate variances between IVA findings and RADV sampling reports or other reference documents and may impact enrollee risk score.
 - Warnings do not require remediation and resubmission. However, warnings may result in a lower than anticipated Risk Score for one (1) or more enrollees, so it is recommended that all warnings are reviewed before confirming the submission as final.
 - If the IVA Entity chooses to remediate a warning then the IVA Entity Audit Results Submission (XML) must be corrected and resubmitted.

IVA Findings Report – Warnings

(continued)



- The **IVA Findings Report** will be generated once all Fatal and Critical Errors have been resolved.
- IVA Entities must review all warnings to ensure all data was entered as intended.
- IVA Entities may remediate warnings and resubmit the IVA Entity Audit Results Submission XML.



NOTE: The **IVA Findings Report** will only indicate Warnings which do not require remediation and resubmission. IVA Audit Results Submission (XML) with Warnings may result in a lower than anticipated Risk Score for one (1) or more enrollees.

IVA Findings Report – Warnings

(continued)

IVA Findings Report Warnings – Examples:

```
<responseType>Warning</responseType>  
<dataElement>primaryCoderDiagnosisCode</dataElement>  
<valueProvided>A038</valueProvided>  
<responseCode>3.5.2</responseCode>  
<responseMessage>Invalid ICD-10 code.</responseMessage>
```

- In the **IVA Findings Report** example above, a Warning is indicated in the 'responseType' tag.
 - The tag 'dataElement' indicates the data element causing the warning, 'primaryCoderDiagnosisCode'.
 - The tag 'responseMessage' provides the warning message explaining the reason for the warning. In this case an error is due to the 'Invalid ICD-10 code'.
- **Resolution** → The IVA Entity may, if it chooses, enter a valid ICD-10-CM code and resubmit the IVA Entity Audit Results Submission (XML).



REMINDER: IVA Entities are not required to resubmit the IVA Entity Audit Results Submission (XML) if warnings are identified on the **IVA Findings Report**.

Questions

To contact us, email us at:

CCIOACARADDataValidation@cms.hhs.gov

OR

Contact us within the HHS-RADV Audit Tool using the Inquiries tab and selecting Submit Inquiry.

Next Steps

Next Steps: Training Sessions

- CMS will continue to support Stakeholders through the HHS-RADV process by hosting periodic webinars.
- There will be an opportunity for stakeholders to ask HHS-RADV related questions during the webinar sessions.

Next Steps: Training Sessions (continued)

Upcoming Webinars

Date	Time	Topic
November 1, 2017	11:30 a.m. – 12:30 p.m. ET	Error Estimation
November 8, 2017	11:30 a.m. – 12:30 p.m. ET	Question & Answer

Locating HHS-RADV Documents in REGTAP

Stakeholders can access additional documents at <https://www.REGTAP.info> in the REGTAP Library.

Under Program Area, select
“HHS-Operated Risk Adjustment Data Validation”

The screenshot displays the REGTAP Library interface. At the top, the REGTAP logo is followed by navigation links: Registration for Technical Assistance Portal, My Dashboard, Training Events, Inquiry Tracking, Library, FAQs, Contact Us, About REGTAP, and Log Out. Below the navigation bar, the 'Library' section is active. On the left, a 'Filter by:' dropdown menu is open, showing a list of program areas. A red arrow points to 'HHS-Operated Risk Adjustment Data Validation (RADV)'. To the right of the filter menu, there is a 'Training Event' dropdown and a 'Search' button. Below the filter menu, a table lists documents. The table has three columns: Program Area, Resource Type, and Download. The documents listed are: User Fees (Supporting Documents), User Fees (Supporting Documents), User Fees (Presentation Slides), User Fees (FAQ), User Fees (Supporting Documents), Distributed Data Collection for RI and RA/Edge Server (CBT), and Distributed Data Collection for RI and RA/Edge Server (Presentation Slides).

Program Area	Resource Type	Download
User Fees	Supporting Documents	Download
User Fees	Supporting Documents	Download
User Fees	Presentation Slides	Download
User Fees	FAQ	Download
User Fees	Supporting Documents	Download
Distributed Data Collection for RI and RA/Edge Server	CBT	Play CBT Transcript
Distributed Data Collection for RI and RA/Edge Server	Presentation Slides	Download

Questions?

To submit or withdraw questions by phone:

- *Dial *# (star-pound) on your phone's keypad to submit your question.*
- *Dial *# (star-pound) to withdraw your question.*

Resources

Resources: Contact Information

Resource	Contact Information
For RADV policy questions, contact the RADV Team.	CCIIIOACARADDataValidation@cms.hhs.gov
EDGE server questions, please contact your Financial Management (FM) Service Representative directly and copy the Centers for Medicare & Medicaid Services (CMS) Help Desk.	EDGE_server_data@cms.hhs.gov and copy CMS_FEPS@cms.hhs.gov

Resources: Links

Resource	Resource Link
U.S. Department of Health & Human Services (HHS)	http://www.hhs.gov/
Centers for Medicare & Medicaid Services (CMS)	http://www.cms.gov/
The Center for Consumer Information & Insurance Oversight (CCIIO) web page	http://www.cms.gov/ccio
Consumer website on Health Reform	http://www.healthcare.gov/
Registration for Technical Assistance Portal (REGTAP) - presentations, FAQs	https://www.REGTAP.info
Patient Protection and Affordable Care Act (PPACA)	http://www.gpo.gov/fdsys/pkg/PLAW-111publ148/content-detail.html

Resources: Links (continued)

Resource	Resource Link
HHS Notice of Benefit and Payment Parameters for 2014	http://www.gpo.gov/fdsys/pkg/FR-2013-03-11/pdf/2013-04902.pdf
HHS Notice of Benefit and Payment Parameters for 2015	http://www.gpo.gov/fdsys/pkg/FR-2014-03-11/pdf/2014-05052.pdf
HHS Notice of Benefit and Payment Parameters for 2016	http://www.gpo.gov/fdsys/pkg/FR-2015-02-27/pdf/2015-03751.pdf
HHS Notice of Benefit and Payment Parameters for 2017	https://www.gpo.gov/fdsys/pkg/FR-2016-03-08/pdf/2016-04439.pdf
HHS Notice of Benefit and Payment Parameters for 2018	https://www.gpo.gov/fdsys/pkg/FR-2016-12-22/pdf/2016-30433.pdf

Resources: Links (continued)

Resource	Resource Link
Affordable Care Act (ACA) HHS-Operated Risk Adjustment Data Validation (RADV) Process White Paper, June 22, 2013	https://www.regtap.info/uploads/library/ACA_HHS_OperatedRADVWhitePaper_062213_5CR_062213.pdf

Closing Remarks