

# HHS Risk Adjustment Data Validation (HHS-RADV)

## Initial Validation Audit (IVA) Entity Inter-rater Reliability (IRR) Submission and Validation Process

**October 16, 2019**

**HHS-RADV Webinar Series IV**

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The information provided in this presentation is only intended to be a general informal summary of technical legal standards. It is not intended to take the place of the regulations that it is based on. We encourage audience members to refer to the applicable regulations for complete and current information about the requirements that apply to them.

[WWW.REGTAP.INFO](http://WWW.REGTAP.INFO)



# Session Agenda

- Session Guidelines
- Intended Audience
- Purpose
- HHS-RADV Timeline
- Opening of the Audit Tool – Testing & Submission
- IVA Entity IRR Process
- CMS Recommended IRR Methodology
- Examples of Calculating Primary Coder Consistency Measure
- IRR Results Template Overview
- IRR Results Submission Process
- CMS Review of the IRR Results
- Question & Answer (Q&A)
- Next Steps & Resources
- Closing Remarks

# Session Guidelines

- This is a 60-minute webinar session
- For questions regarding HHS-RADV administrative appeals, please email [CCIIOACARADDataValidation@cms.hhs.gov](mailto:CCIIOACARADDataValidation@cms.hhs.gov)
- For questions regarding logistics and registration, please contact the Registrar at: (800) 257-9520

# Intended Audience

- Issuers subject to the HHS-RADV Audit requirements under 45 CFR § 153.630
- IVA Entities
- Third Party Administrators (TPA) and Support Vendors

# Session Purpose

- Provide guidance on the IVA Entity IRR Process, the CMS Recommended IRR Methodology, examples of Calculating Primary Coder Consistency Measure.
- Provide an overview of the IRR Results Template, the IRR Results Submission Process, and the CMS Review of the IRR Results

# HHS-RADV Timeline

# HHS-RADV Timeline



To access the HHS-RADV Timeline, please log into the Registration for Technical Assistance Portal (REGTAP) and visit the HHS-RADV Program Area page:

[www.REGTAP.info/hhsradv.php](http://www.REGTAP.info/hhsradv.php)

# Opening of Audit Tool - Testing

# Opening of the Audit Tool - Testing

- The IVA Results Submission period opens Monday, November 4, 2019, for testing and/or submission of IVA findings
- The Centers for Medicare & Medicaid Services (CMS) is offering a Test Mode allowing IVA Entities to submit the IVA Entity Audit Results Submission XML to test for any errors
- CMS strongly encourages IVA Entities to submit the IVA Entity Audit Results Submission XML in Test Mode for at least one (1) Health Insurance Oversight System (HIOS) ID when the window opens, to ensure the XML is formatted correctly and accepted by the Audit Tool

# Opening of the Audit Tool – Testing

(continued)

- IVA Entities must select **'test'** to submit the XML file in Test Mode to determine if any errors/warnings exist and correct as necessary
- Test Mode only allows submission of the IVA Entity Results Submission XML and only produces the XML Validation Check Report and IVA Findings Report for Package 1
  - IVA Entity signoff on IVA Findings Reports for Package 1 for submissions will not be permitted in test mode
  - Package 1 and 2 files **will not be permitted** for submission if Test Mode is selected
  - Email notifications to issuers will be disabled for submissions in Test Mode
  - The testing window will close **November 22<sup>nd</sup> at 11:59 p.m. Eastern Time (ET)**
  - After November 22<sup>nd</sup> all test files will be removed from the Audit Tool

# Opening of the Audit Tool – Testing

(continued)

- The IVA System Generated Password page is currently available to IVA Entities
  - IVA Entities can begin encrypting and password protecting their IVA Package 1 and 2 files in preparation for upload to the Audit Tool once the IVA Results Submission period opens on November 4, 2019
  - **All uploaded files must be encrypted and password protected in a Zip file format using the specified Password for the Zip file**
- CMS encourages issuers and IVA Entities to ensure that they have access to the Audit Tool by logging in and verifying that their user name and password is working correctly
- If you have a new computer and need to re-establish connectivity to WinAuth for two (2)-factor authentication, email [CCIIOACARADDataValidation@cms.hhs.gov](mailto:CCIIOACARADDataValidation@cms.hhs.gov) and provide a date/time for the help desk to work with you to resolve issues

# Opening of Audit Tool - Submission

# Opening of the Audit Tool - Submission

- The IVA Entity Audit Results Submission XML and Package 1 and Package 2 may be submitted as a 'live submission' starting November 4, 2019
- Please ensure that you are selecting the correct intended action – **Submit**
- **NOTE: If selecting submit - these submissions will be considered final upon submission and signoff**

# IVA Entity IRR Process

# IRR Process Overview

- IVA Entities are required to conduct IRR for all Primary Coders and submit results to CMS
  - IRR compares substantiated Hierarchical Condition Categories (HCCs) to measure the consistency between the Primary Coders and Senior Coders
  - IVA Entities may submit the IRR Results Template at any time during the audit results submission window
- Additional information on the IRR process and IRR sampling methodology can be found in Section 10 in the 2018 Benefit Year HHS-RADV Protocols located in the Audit Tool or the Registration for Technical Assistance Portal (REGTAP) Library



**NOTE:** As stated in the 2020 Payment Notice, for the 2018 benefit year HHS-RADV, the IRR required accuracy rate is 95%\*

\*<https://s3.amazonaws.com/public-inspection.federalregister.gov/2017-23599.pdf>

# IRR Requirements

- The IVA Entity must:
  - Ensure that the Primary Coders who achieve consistency measure of 95% maintain this level throughout the entirety of the review
  - Assure that all medical records reviewed by Primary Coders who did not meet the IRR consistency measure of 95% are re-reviewed by a Senior Coder
  - Calculate the consistency measure using the appropriate secondary review process, in accordance with all experience requirements for Senior Coders
  - Indicate the IRR methodology used (“CMS recommended” or “Other”) providing required written summarization of the IVA Entity’s IRR process if the “Other” option is chosen (see Section 10 of the Protocols for detail guidance)
  - Maintain evidence that IRR reviews are being executed and evaluated in accordance with these guidelines

# IRR Requirements (continued)

- For IVA Entities using their own IRR method, the IVA Entity is required to:
  - Document and submit the IRR procedural process with the IRR submission
  - Calculate the consistency measure for all Primary Coders, which should be 95%
  - Ensure the Senior Coder reviews a sample of Medical Records, re-performing the IRR for any Primary Coder with a consistency measure of less than 95% until the 95% consistency threshold is met

# **CMS Recommended IRR Methodology**

# IRR Steps – CMS Recommended Methodology

- The five (5) steps of the IRR process:

Step 1 - Primary  
Coder Performs  
Health Status Data  
Validation

Step 2 – IRR  
Sample Selection

Step 3 – Senior  
Coder Performs  
Health Status Data  
Validation

Step 4 – Calculate  
Primary Coder  
Consistency  
Measure

Step 5 – Finalize  
IRR or Adjust  
Sample

# IRR: Step 1 – Primary Coder performs Health Status Validation

## Step 1

- Primary Coders perform health status data validation
- IVA Entity monitors the number of medical records evaluated by each Primary Coder
- IRR sample selection process is initiated once 25 medical records have been evaluated by the Primary Coder

# IRR: Step 2 – IRR Sample Selection

## Step 2

- After 25 medical records have been evaluated by the Primary Coder, the initial sample of 25 medical records is evaluated by the Senior Coder



**NOTE:** Medical records reviewed by Primary Coders that do not contain diagnoses that map to HCCs must be counted towards the sample of 25 medical records needed to initiate the IRR calculation

# IRR: Step 3 – Senior Coder Performs Health Status Validation

## Step 3

- The Senior Coder performs health status data including diagnosis coding and abstraction for each medical record in the sample
- Senior Coders are not required to be blind to Primary Coder findings; that is, Senior Coders are permitted to review Primary Coder findings for the medical record under review
- Once Senior Coders complete the health status data validation for all 25 sampled medical records, the consistency measure for the Primary Coder is calculated

# IRR: Step 4 – Calculate Primary Coder Consistency Measure

## Step 4

- Abstracted diagnoses are mapped to HCCs
- Primary Coder findings are used with the Senior Coder findings to calculate the Primary Coder's consistency measure
- The IVA Entity requires a consistency measure of 95% for all Primary Coders throughout the entirety of the review

# IRR: Step 4 – Calculate Primary Coder Consistency Measure (continued)

## Step 4

- The Primary Coder consistency measure for the sample of 25 medical records is calculated using the following formula:

$$CM_{PC} = \frac{\text{Count of Primary Coder and Senior Coder HCC Matches}}{\text{Count of Unique HCCs (Primary Coder \& Senior Coder)}}$$

- The *numerator* indicates the count of Primary Coder and Senior Coder HCC matches for unique HCCs and will be counted as a single match for each enrollee
- The *denominator* indicates the total universe of unique enrollee HCCs identified by both Primary and Senior Coders and is calculated by totaling the number of unique enrollee HCCs identified within the 25 medical record sample

# IRR: Step 4 – Calculate Primary Coder Consistency Measure (continued)

## Step 4

- For the purposes of calculating the *denominator*, the same HCC for a single enrollee should not be counted more than once
- However, the same HCC identified for different enrollees should be considered unique for each enrollee

# IRR: Step 4 – Calculate Primary Coder Consistency Measure (continued)

## Step 4

- Example 1
  - An enrollee has 25 medical records and the primary coder identifies HCC 8 on all medical records
  - The Senior Coder also finds HCC 8 on all medical records
  - HCC 8 would be counted once in the numerator and once in the denominator
- Example 2
  - Enrollee 1 has 10 medical records and Enrollee 2 has 15 medical records
  - Both the Primary Coder and Senior Coder identifies HCC 8 on all medical records for both enrollees
  - HCC 8 would be counted once for each enrollee

# IRR: Step 5 – Finalize IRR or Adjust Sample

## Step 5

- The last step in the IRR process is to either finalize the IRR results or adjust the sample size
  - If the Primary Coder's calculated consistency measure meets or exceeds the required 95%, the Primary Coder has completed the requirements for IRR evaluation
  - If the Primary Coder's calculated consistency measure fails to meet the required 95%, the IVA Entity is required to re-perform steps 1-5
    - This process must be re-performed until the acceptable consistency measure is achieved or until no additional medical records reviewed by the Primary Coder remain

# Examples of Calculating Primary Coder Consistency Measure

# IRR: Examples of Calculating Primary Coder Consistency Measure

## Example 1

- Primary Coder reviewed 25 medical records and identified diagnoses mapping to four (4) HCCs, which were also found by Senior Coders for the same enrollees
- The Senior Coder found no other diagnoses assigned to additional HCCs
  - *Consistency Measure for Primary Coders* =  $\frac{4}{4} = 100\%$
- The Primary Coder's calculated consistency measure meets the required 95%
- IRR evaluation requirements have been met



**NOTE:** Senior Coder results are captured as final for all medical records reviewed if deviations are identified, even when the calculated consistency measure meets the required 95%

# IRR: Examples of Calculating Primary Coder Consistency Measure (continued)

## Example 2

- Primary Coder reviewed 25 medical records and identified diagnoses mapping to seven (7) HCCs for the same enrollee
- The Senior Coder validated four (4) of the seven (7) HCCs and the remaining three (3) HCCs were unsubstantiated
- Additionally, the Senior Coder found additional diagnoses which were assigned to two (2) HCCs not found by the Primary Coder
  - Consistency Measure Primary Coders =  $\frac{4}{9} = 44.44\%$



**NOTE:** Senior Coder results are captured as final for all medical records reviewed with deviations identified

# IRR: Examples of Calculating Primary Coder Consistency Measure (continued)

- The Primary Coder's calculated consistency measure of 44.44% does not meet the required 95% and the Primary Coder is required to re-perform the IRR assessment
  - A second set of 25 medical records are reviewed and the Primary Coder identified diagnoses mapping to 19 HCCs for the same enrollee
  - The Senior Coder validated the 19 HCC's and identified a diagnosis which mapped to one (1) additional HCC not found by the Primary Coder
    - Consistency Measure Primary Coders =  $\frac{19}{20} = 95\%$
  - The Primary Coder's calculated consistency measure meets the required 95%
  - IRR evaluation requirements have been met



**NOTE:** Senior Coder results are captured as final for all medical records reviewed in the IRR process, even when the Primary Coder's calculated consistency measure meets the required 95%

# IRR Results Template Overview

# IRR Results Template Overview

- The IRR Results Template can be submitted to the Audit Tool starting November 4, 2019 with a due date of January 16, 2020 by 11:59 p.m. ET
- The IRR Results Template does not have to be submitted prior to the submission of IVA Entity Audit Results Submission XML
- The IRR Results Submission Form is available to IVA Entity Senior Officials (SOs) and Coordinators
- The IRR Results Template must be signed by an IVA Entity SO

# IRR Results Template Overview (continued)

- The IRR Results Template requires the following information:
  - IVA Entity Name
  - Primary Coder Initials
  - HIOS IDs reviewed by the Primary Coder for the IRR
  - IRR Percentage (*HCCs matched by Senior Coder divided by total HCCs reviewed by Senior Coder*)
  - Pass/Fail Rating (*A Primary Coder will 'Pass' IRR if IRR Percentage is 95% or above*)
  - Signature of IVA Entity SO
  - Printed Name of IVA Entity SO
  - Job Title of IVA Entity SO
  - Date
- The IRR Results must be encrypted and password protected prior to upload into the Audit Tool
- The IRR Summarization must be uploaded along with the IRR reporting certification



# IRR Results Template (continued)

**IRR Reporting Certification**

To the best of my knowledge, information and belief, I hereby certify that this Initial Validation Audit Entity is in compliance with all Centers for Medicare & Medicaid Services, HHS-RADV requirements and processes for inter-rater reliability. If my organization becomes aware that any of the IRR requirements or processes were violated or any information included in this template are untrue, inaccurate, or incomplete, my organization will promptly inform CMS.

IVA Entity Senior Official Signature: \_\_\_\_\_

Date: \_\_\_\_\_

IVA Entity Senior Official Name (printed): \_\_\_\_\_

IVA Entity Senior Official Job Title: \_\_\_\_\_



# IRR Results Submission Process

# Overview: Audit Tool IRR Results Submission Process

- To complete the IRR Results Submission Process, locate the 2018 benefit year IRR Results Template by logging into the HHS-RADV Audit Tool
  - Select the Library tab
  - Select the Education tile
- Save the template to your computer
- Print the document



**NOTE:** The IRR Results Submission web form will be available starting November 4, 2019

# Overview: Audit Tool IRR Results Submission Process (continued)

- After completing all of the required fields in the template, the IVA Entity SO must sign
- Please note, an electronic signature is also acceptable
  - Scan and save the signed IRR Results Template as a PDF to your computer.
  - Access the IRR Results Submission Web Form
  - Password protect and encrypt the IRR Results using the password in the IRR Results Submission web form
    - If the password used to protect the file is not correct, the file cannot be processed by the Audit Tool
    - The submitter will receive a notification email and the IVA Entity will be required to resubmit the file with the correct password
- Upload and submit the completed and signed IRR Results File to the Audit Tool by using the IRR Results Submission Web Form

# Overview: Audit Tool IRR Results Submission Process (continued)

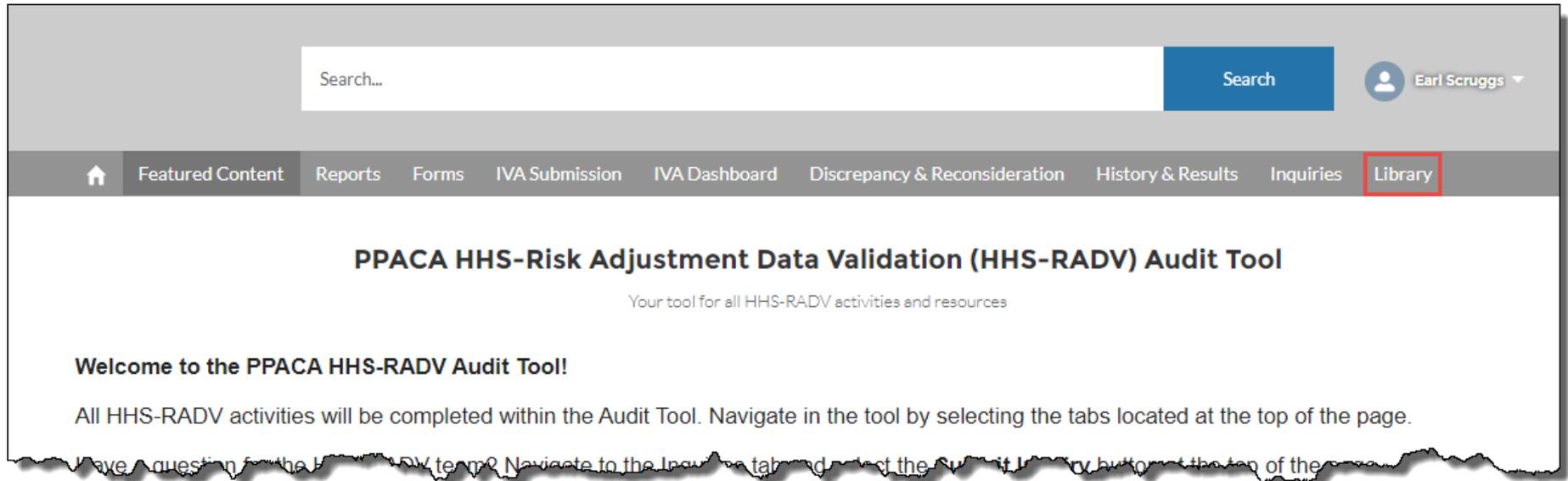
- If the IVA Entity is not using the CMS recommended IRR methodology, the IVA Entity is required to submit a document summarizing the IRR methodology utilized
  - For additional guidance pertaining to alternative IRR calculation methods, refer to Section 10.2 (IRR Submission and Documentation) of the 2018 Benefit Year HHS-RADV Protocols
- This IRR summarization must be uploaded to the Audit Tool in addition to the IRR Results Template
  - Password protect, zip, and encrypt the IRR summarization using the password in the IRR Results Submission Web Form
    - If the password used to protect the file is not correct, the file cannot be processed by the Audit Tool
    - The submitter will receive a notification email and the IVA Entity will be required to resubmit the file with the correct password



**NOTE:** To ensure that you use the correct IRR assigned password for this process, please note that the assigned IRR password is NOT the same password which will be assigned for submission of Packages 1 & 2. Please make sure to use the correct IRR assigned password for this process.

# Step 1: Accessing the IRR Results Template (continued)

- Log into the Audit Tool and select the **Library** tab



The screenshot shows the user interface of the PPACA HHS-Risk Adjustment Data Validation (HHS-RADV) Audit Tool. At the top, there is a search bar with the text "Search..." and a blue "Search" button. To the right of the search bar is a user profile icon for "Earl Scruggs". Below the search bar is a navigation menu with several tabs: "Featured Content", "Reports", "Forms", "IVA Submission", "IVA Dashboard", "Discrepancy & Reconsideration", "History & Results", "Inquiries", and "Library". The "Library" tab is highlighted with a red border. Below the navigation menu, the main content area displays the title "PPACA HHS-Risk Adjustment Data Validation (HHS-RADV) Audit Tool" and the subtitle "Your tool for all HHS-RADV activities and resources". A welcome message reads: "Welcome to the PPACA HHS-RADV Audit Tool! All HHS-RADV activities will be completed within the Audit Tool. Navigate in the tool by selecting the tabs located at the top of the page. Have a question for the HHS-RADV team? Navigate to the Inquiries tab and click the submit inquiry button at the top of the page."

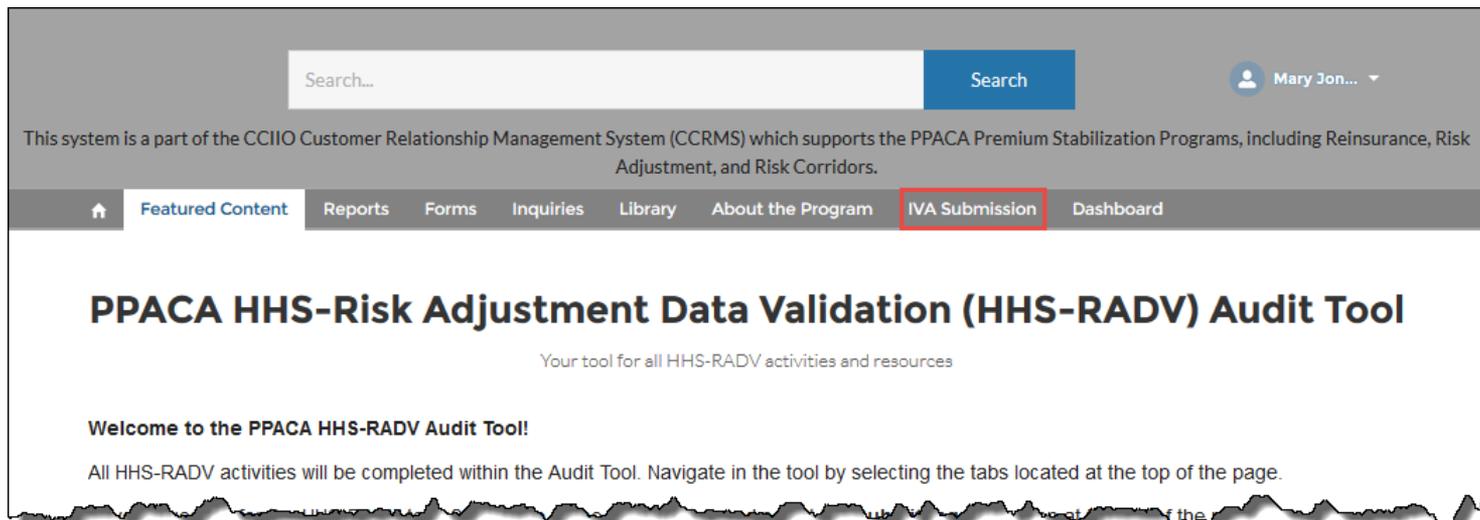
# Step 1: Accessing the IRR Results Template (continued)

- Select the **Education** tile to access the IRR Results Template

The screenshot shows the user interface of the PPACA HHS-Risk Adjustment Data Validation (HHS-RADV) Audit Tool. At the top, there is a search bar and a user profile for 'Mary Jon...'. Below the search bar, a navigation menu includes 'Featured Content', 'Reports', 'Forms', 'Inquiries', 'Library', 'About the Program', and 'IVA Submission'. The main heading is 'PPACA HHS-Risk Adjustment Data Validation (HHS-RADV) Audit Tool', with a subtitle 'Your tool for all HHS-RADV activities and resources'. Below this, a prompt says 'Select a button to open a section of the Audit Tool Library.' A grid of six colored tiles is displayed: 'FAQS' (blue), 'PROTOCOLS' (brown), 'EDUCATION' (teal, circled in red), 'GUIDANCE' (green), 'WEBINARS' (purple), and 'ANNOUNCEMENTS' (maroon).

# Step 2: Accessing the IRR Results Submission Form (continued)

- Complete the IRR Results Template
- Complete an IRR summarization if an alternative IRR methodology is used
- Log into the Audit Tool
- Select the **IVA Submission** tab



Search... Search

Mary Jon...

This system is a part of the CCIIO Customer Relationship Management System (CCRMS) which supports the PPACA Premium Stabilization Programs, including Reinsurance, Risk Adjustment, and Risk Corridors.

Featured Content Reports Forms Inquiries Library About the Program **IVA Submission** Dashboard

## PPACA HHS-Risk Adjustment Data Validation (HHS-RADV) Audit Tool

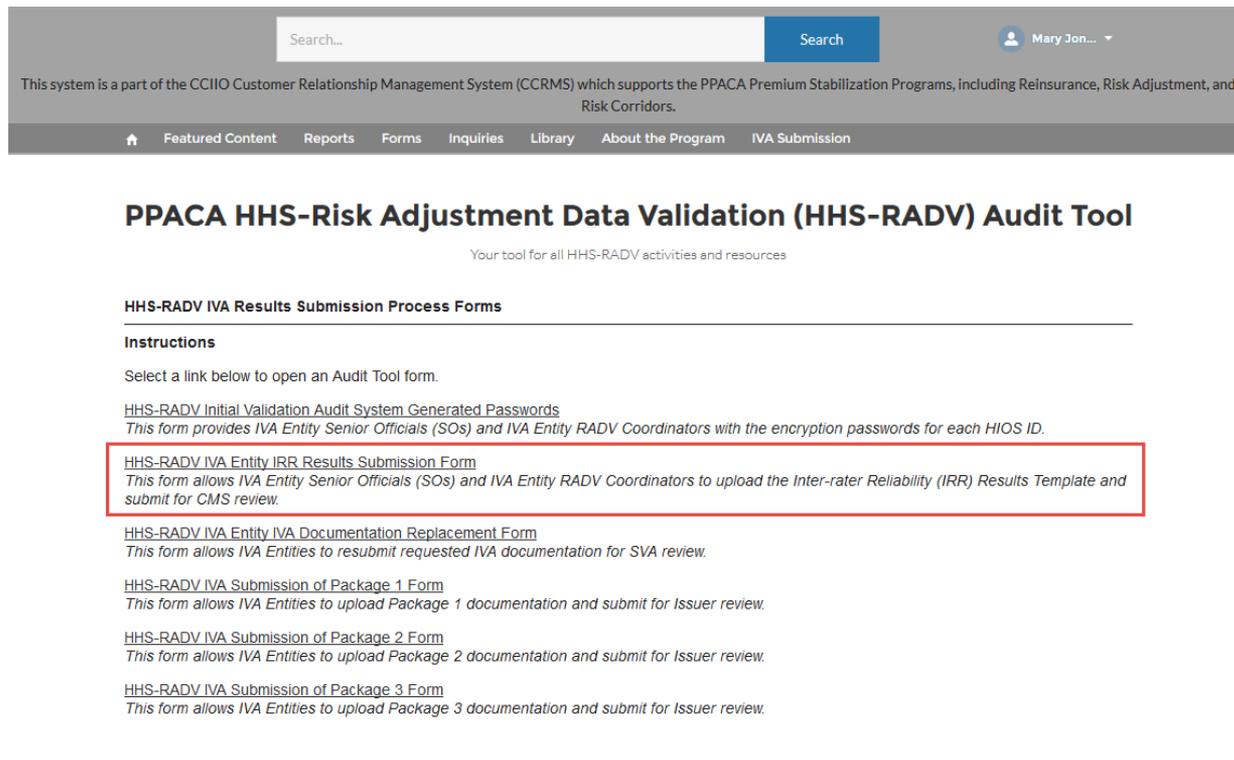
Your tool for all HHS-RADV activities and resources

Welcome to the PPACA HHS-RADV Audit Tool!

All HHS-RADV activities will be completed within the Audit Tool. Navigate in the tool by selecting the tabs located at the top of the page.

# Step 2: Accessing the IRR Results Submission Form (continued)

- Select the HHS-RADV IVA Entity IRR Results Submission Form link



Search... Search Mary Jon...

This system is a part of the CCIIO Customer Relationship Management System (CCRMS) which supports the PPACA Premium Stabilization Programs, including Reinsurance, Risk Adjustment, and Risk Corridors.

Featured Content Reports Forms Inquiries Library About the Program IVA Submission

## PPACA HHS-Risk Adjustment Data Validation (HHS-RADV) Audit Tool

Your tool for all HHS-RADV activities and resources

### HHS-RADV IVA Results Submission Process Forms

#### Instructions

Select a link below to open an Audit Tool form.

[HHS-RADV Initial Validation Audit System Generated Passwords](#)  
This form provides IVA Entity Senior Officials (SOs) and IVA Entity RADV Coordinators with the encryption passwords for each HIOS ID.

**[HHS-RADV IVA Entity IRR Results Submission Form](#)**  
This form allows IVA Entity Senior Officials (SOs) and IVA Entity RADV Coordinators to upload the Inter-rater Reliability (IRR) Results Template and submit for CMS review.

[HHS-RADV IVA Entity IVA Documentation Replacement Form](#)  
This form allows IVA Entities to resubmit requested IVA documentation for SVA review.

[HHS-RADV IVA Submission of Package 1 Form](#)  
This form allows IVA Entities to upload Package 1 documentation and submit for Issuer review.

[HHS-RADV IVA Submission of Package 2 Form](#)  
This form allows IVA Entities to upload Package 2 documentation and submit for Issuer review.

[HHS-RADV IVA Submission of Package 3 Form](#)  
This form allows IVA Entities to upload Package 3 documentation and submit for Issuer review.

# Step 3: Completing the IRR Results Submission Form

- Review the instructions on the page
- Select the **Continue** button



[Guidance](#)

## Welcome to the IVA Entity IRR Results Submission Form

This form allows IVA Entities to upload Inter-rater Reliability (IRR) results by CMS Recommended IRR Process or Alternate IRR Process and submit for CMS review.

The HHS-RADV IVA Entity IRR Results file must be submitted by **11:59 p.m. ET on January 16, 2020**.

If you need assistance or have questions related to the submission or review of IVA Entity IRR results, you may submit an inquiry from the Audit Tool by selecting the **Inquiries** tab, and selecting the **Submit Inquiry** button, or by emailing us at [CCIIOACARADatavalidation@cms.hhs.gov](mailto:CCIIOACARADatavalidation@cms.hhs.gov)

### Instructions

Select the **IVA Entity IRR Results Template** link to download and complete the template. The template can also be found by going to the Audit Tool Library and selecting the Education Tile. The IVA Entity IRR Results Template must be saved as a PDF, zipped, and encrypted before the file is submitted to the Audit Tool. Use the [IVA File Encryption Guide](#) for guidance on uploading an encrypted file. Please complete the template prior to proceeding in the form.

In addition, if you utilized your own practices for executing IRR, in lieu of the CMS recommended IRR methodology, you are required to upload a summarization to explain your IRR methodology.

[IVA Entity IRR Results Template](#)

Continue

By using this web form, you accept the terms and conditions. If you decline, you should not use the web form.

- This warning banner provides privacy and security notices consistent with applicable federal laws, directives, and other federal guidance for accessing this U.S. Government information system, which includes (1) this computer, (2) this computer network, (3) all computers connected to this network, and (4) all devices and storage media attached to this network or to a computer on this network.
- This system is provided for Government-authorized use only.
- Unauthorized or improper use of this system is prohibited and may result in disciplinary action and/or civil and criminal penalties.
- Personal use of social media and networking sites on this system is limited as to not interfere with official work duties and is subject to monitoring.
- By using this system, you understand and consent to the following:
  - The Government may monitor, record, and audit your system usage, including usage of personal devices and email systems for official duties or to conduct HHS business. Therefore, you have no reasonable expectation of privacy regarding any communication or data transiting or stored on this system. At any time, and for any lawful Government purpose, the government may monitor, intercept, and search and seize any communication or data transiting or stored on this system.
  - Any communication or data transiting or stored on this system may be disclosed or used for any lawful Government purpose.



# Step 3: Completing the IRR Results Submission Form (continued)

- This screen shows the IVA Entity IRR Results File Upload page
- Select the IRR methodology for your organization from the drop-down menu: CMS Recommended IRR Process or Alternative IRR Process

**CMS**  
CENTERS FOR MEDICARE & MEDICAID SERVICES  
CENTER FOR CONSUMER INFORMATION  
& INSURANCE OVERSIGHT

[Guidance](#)

## IVA Entity IRR Results File Upload

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### Instructions

Select the IRR methodology for your organization, either CMS Recommended IRR Process or Alternative IRR Process. Select CMS recommended IRR Process if you utilized the CMS recommended IRR methodology otherwise select Alternative IRR Process to indicate that you used your own practice for executing IRR. If you select Alternative IRR Process, you are required to upload the completed IVA Entity IRR Results as well as a summarization documenting the IRR methodology used.

All uploaded files must be encrypted and password protected in a Zip file format using the specified **Password for Zip file**. Select the **Browse/Choose File** button to locate and upload the IRR Results file.

You may download files to review after upload. Each encrypted file requires a password and file manager, such as 7-Zip or WinZip, to extract and open the file. Select the **Library** tab in the Audit Tool then select the Education Tile to locate the **Downloading Encrypted Files Instructions** for guidance on downloading and opening the file(s). Hover your mouse over the **Password** to view the required password for the file. You may copy and paste the password to use when prompted.

Required fields are indicated with a red asterisk (\*).

---

**IVA Entity Name:** Macaroni LLC

\* **Select the IRR approach that you used:**

**Password for Zip file:**

\* **Upload an IRR Results File**



# Step 3: Completing the IRR Results Submission Form (continued)

- **CMS Recommended IRR Process**

- The CMS Recommended IRR Process requires the upload of the IRR Results File
- The IRR Results File must be encrypted and protected using the IRR password provided on this page or the IRR Results cannot be processed by the Audit Tool

Required fields are indicated with a red asterisk (\*).

---

**IVA Entity Name:** Macaroni LLC

\* **Select the IRR approach that you used:**

**Password for Zip file:**

\* **Upload an IRR Results File**

No file selected.

Maximum file size: 10 MB

There are no current IRR Results File Submissions. Select **Show History** to view previous uploads.

# Step 3: Completing the IRR Results Submission Form (continued)

- **CMS Recommended IRR Process**
  - On the IRR File Upload page, the encryption password will be presented
    - Use a zipping tool like WinZip or 7-Zip to encrypt and password protect the file using the password presented on this page
    - Select the **Browse/Choose File** button to locate your saved file
    - Select the **Upload Attachment** button to upload the zip file

# Step 3: Completing the IRR Results Submission Form (continued)

- **CMS Recommended IRR Process**

- After uploading the IRR Results, view the file by selecting the **Download** link in the table
- The Status column indicates the current status of the IRR Results submission

#### Uploaded IRR Results File

Action	File Name	Uploaded	Status
<a href="#">Download</a> <a href="#">Delete</a>	IRR Submission.zip	Jerry Rivers 9/16/2019 1:49 PM ET	Not Submitted

# Step 3: Completing the IRR Results Submission Form (continued)

- **Alternative IRR Process**

- The Alternative IRR Process requires the upload of the IRR Results File **and** an IRR summarization document
- Both files must be encrypted and protected using the IRR password provided on this page or the IRR Results cannot be processed by the Audit Tool

Required fields are indicated with a red asterisk (\*).

**IVA Entity Name:** Macaroni LLC

\* **Select the IRR approach that you used:**

**Password for Zip file:**

\* **Upload an IRR Results File**

No file selected.

Maximum file size: 10 MB

There are no current IRR Results File Submissions. Select **Show History** to view previous uploads.

\* **Upload an IRR Summarization**

No file selected.

Maximum file size: 10 MB

There are no current IRR Summarization File Submissions. Select **Show History** to view previous uploads.

# Step 3: Completing the IRR Results Submission Form (continued)

- **Alternative IRR Process**

- On the IRR File Upload page, the encryption password will be presented
- For both the IRR Results File and the summarization:
  - Use a zipping tool like WinZip or 7-Zip to encrypt and password protect the files using the password presented on this page
  - Select the **Browse/Choose File** button to locate your saved file
  - Select the **Upload Attachment** button to upload the zip file

# Step 3: Completing the IRR Results Submission Form (continued)

- **Alternative IRR Process**

- After uploading the files, view a file by selecting the **Download** link in the relevant table
- The Status column indicates the current status of the IRR Results submission

Uploaded IRR Results File

Action	File Name	Uploaded	Status
<a href="#">Download</a> <a href="#">Delete</a>	IRR Summary.zip	Jerry Rivers 9/16/2019 2:23 PM ET	Not Submitted

Uploaded IRR Summarization

Action	File Name	Uploaded	Status
<a href="#">Download</a> <a href="#">Delete</a>	IRR Summary.zip	Jerry Rivers 9/16/2019 2:23 PM ET	Not Submitted

# Step 4: Submitting the IRR Results Submission Form

- Select the **Submit** button when you are ready to submit



[Show History](#)

**Submitter Contact Information**

<b>First Name:</b>	Mary	<b>Last Name:</b>	Jones
<b>Email Address:</b>	sampleuser78+iva2@gmail.com	<b>Job Title:</b>	Analyst
<b>Phone Number:</b>	(555) 555-5555	<b>Phone Extension:</b>	

# Step 4: Submitting the IRR Results Submission Form (continued)



**NOTE:** If you have selected the Alternative IRR Process and select the submit button without uploading an IRR summarization file, the form will display an error and will not allow you to submit until the IRR summarization file is uploaded

and paste the password to use when prompted.

Required fields are indicated with a red asterisk (\*).

You must upload an IRR summarization file.

**IVA Entity Name:** Macaroni LLC

\* **Select the IRR approach that you used:**

**Password for Zip file:**

# **CMS Review of the IRR Results**

# Review of the IRR Results File

- After submitting the form, the submitter will navigate to the confirmation page
- This page is your only confirmation that the form has been submitted
  - Print or save the PDF as a record of your submission
  - The IVA Entity will receive a separate email after CMS completes its review of the submitted IRR Results
  - CMS will advise if the IRR Results are accepted or not accepted

# Review of the IRR Results File (continued)

- Some reasons for CMS not accepting the IRR Results:
  - Results are not signed by the IVA Entity SO
  - Signature of IVA Entity SO and printed name do not match
  - Results do not include the job title of the IVA Entity SO
  - Data is missing from the IRR Results submission
  - The IRR Results Template language or fields are altered **and/or**
  - The IRR summarization is deemed insufficient and/or not submitted with the upload, if it is required with the submission

# Review of the IRR Results File (continued)

- If the IRR Results are not accepted by CMS:
  - The IVA Entity will need to update the IRR Results Template and/or the IRR summarization
  - The IVA Entity will need to once again complete the IRR Submission Form and upload the revised results and IRR summarization, if necessary

# Q&A

- Type your question in the text box under the ‘Q&A’ tab located to the left-hand panel of your screen
  - To submit your question, click “Submit”



If your question does not receive a response during this webinar session, please submit your question to the HHS-RADV team at [CCIIOACARADDataValidation@cms.hhs.gov](mailto:CCIIOACARADDataValidation@cms.hhs.gov)

# Next Steps

# Next Steps: Training Sessions

Topic	Date
<b>2018 Benefit Year HHS-RADV Package 1 and 2 Submission Process</b>	<b>October 23, 2019</b>

# Resources

# 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 Risk Adjustment Data Validation (HHS-RADV)”

The screenshot shows the REGTAP Library interface. At the top, the logo 'REGTAP' is displayed, 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 logo, the word 'Library' is centered, and a button 'Complete Library Inventory Report' is on the right. A search bar contains 'Training Event' with 'Search' and 'Remove Filter' buttons. A dropdown menu for 'Filter by:' is open, showing a list of program areas. A red arrow points to 'HHS-Operated Risk Adjustment Data Validation (RADV)'. Below the dropdown, a table lists various program areas and their associated resources.

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

# Resources: Links

- ICD, XML, and Job Aids
  - Log in to the Audit Tool
- HHS-RADV Timeline and Protocols
  - HHS-RADV 2018 Benefit Year Timeline  
[https://www.regtap.info/reg\\_librarye.php?i=2905](https://www.regtap.info/reg_librarye.php?i=2905)
  - HHS-RADV 2018 Benefit Year Protocols  
[https://www.regtap.info/reg\\_librarye.php?i=2904](https://www.regtap.info/reg_librarye.php?i=2904)
- HHS-RADV Series IV Presentation Slides
  - 2018 Benefit Year HHS-RADV Introduction (3/6/19) [https://www.regtap.info/reg\\_librarye.php?i=2457](https://www.regtap.info/reg_librarye.php?i=2457)
  - HHS-RADV Reports Introduction and Updates, IVA Selection, and Conflict of Interest (3/13/19) [https://www.regtap.info/reg\\_librarye.php?i=2468](https://www.regtap.info/reg_librarye.php?i=2468)
  - Issuer Senior Official Designation (4/3/19) [https://www.regtap.info/reg\\_librarye.php?i=2819](https://www.regtap.info/reg_librarye.php?i=2819)

# Resources: Links (continued)

- HHS-RADV Series IV Presentation Slides
  - IVA Entity Designation (4/3/19) [https://www.regtap.info/reg\\_librarye.php?i=2820](https://www.regtap.info/reg_librarye.php?i=2820)
  - Issuer Participation Requirements (4/3/19) [https://www.regtap.info/reg\\_librarye.php?i=2821](https://www.regtap.info/reg_librarye.php?i=2821)
  - Validating RXC and NDC (5/1/19) [https://www.regtap.info/reg\\_librarye.php?i=2871](https://www.regtap.info/reg_librarye.php?i=2871)
  - 2018 Benefit Year Issuer Exemption & DDVC Web Form (5/8/19) [https://www.regtap.info/reg\\_librarye.php?i=2885](https://www.regtap.info/reg_librarye.php?i=2885)
  - Sampling Report Distribution & Discrepancy Reporting Process (5/8/19) [https://www.regtap.info/reg\\_librarye.php?i=2886](https://www.regtap.info/reg_librarye.php?i=2886)
  - Validating RXC and NDC (5/1/19) [https://www.regtap.info/reg\\_librarye.php?i=2871](https://www.regtap.info/reg_librarye.php?i=2871)
  - 2018 Benefit Year Issuer Exemption & DDVC Web Form (5/8/19) [https://www.regtap.info/reg\\_librarye.php?i=2885](https://www.regtap.info/reg_librarye.php?i=2885)
  - Sampling Report Distribution & Discrepancy Reporting Process (5/8/19) [https://www.regtap.info/reg\\_librarye.php?i=2886](https://www.regtap.info/reg_librarye.php?i=2886)

# Resources: Links (continued)

- HHS-RADV Series IV Presentation Slides
  - 2017 Benefit Year Error Rate Attestation and Discrepancy Reporting (5/15/19)  
[https://www.regtap.info/reg\\_librarye.php?i=2894](https://www.regtap.info/reg_librarye.php?i=2894)
  - 2017 Benefit Year Error Estimation (5/22/19)  
[https://www.regtap.info/reg\\_librarye.php?i=2909](https://www.regtap.info/reg_librarye.php?i=2909)
  - 2018 Benefit Year Protocols Updates (5/29/19)  
[https://www.regtap.info/reg\\_librarye.php?i=2908](https://www.regtap.info/reg_librarye.php?i=2908)
  - IVA Entity Audit Results Submission ICD, XSD, & XML Guidance (6/26/19)  
[https://www.regtap.info/reg\\_librarye.php?i=2934](https://www.regtap.info/reg_librarye.php?i=2934)
  - 2017 Administrative Appeals Process (7/31/19)  
[https://www.regtap.info/reg\\_librarye.php?i=2982](https://www.regtap.info/reg_librarye.php?i=2982)
  - XML, Package 1, 2, & 3 Checks Overview (10/9/19)  
[https://www.regtap.info/reg\\_librarye.php?i=3047](https://www.regtap.info/reg_librarye.php?i=3047)

# Resources: Links (continued)

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

# Resources: Links (continued)

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

# Resources: Links (continued)

Resource	Resource Link
HHS Notice of Benefit and Payment Parameters for 2019	<a href="https://www.govinfo.gov/content/pkg/FR-2018-04-17/pdf/2018-07355.pdf">https://www.govinfo.gov/content/pkg/FR-2018-04-17/pdf/2018-07355.pdf</a>
HHS Notice of Benefit and Payment Parameters for 2020	<a href="https://www.federalregister.gov/public-inspection/2019/04/18#special-filing-health-and-human-services-department">https://www.federalregister.gov/public-inspection/2019/04/18#special-filing-health-and-human-services-department</a>

# Resources: Contact Information

Resource	Contact Information
For RADV policy questions, contact the RADV Team.	<a href="mailto:CCIIOACARADDataValidation@cms.hhs.gov">CCIIOACARADDataValidation@cms.hhs.gov</a>
For EDGE server questions, please contact your Financial Management (FM) Service Representative directly and copy the Centers for Medicare & Medicaid Services (CMS) Help Desk.	<a href="mailto:EDGE_server_data@cms.hhs.gov">EDGE_server_data@cms.hhs.gov</a> and copy <a href="mailto:CMS_FEPS@cms.hhs.gov">CMS_FEPS@cms.hhs.gov</a>
HHS-RADV Audit Tool	To contact us within the HHS-RADV Audit Tool, use the Inquiries tab and select “Submit Inquiry”

# Closing Remarks