

HHS Risk Adjustment Data Validation (HHS-RADV)

2018 Benefit Year HHS-RADV Second Validation Audit (SVA) Findings Report Attestation and Discrepancy Reporting

Medical Record Recommendations on Abstraction

March 25, 2020

HHS-RADV Webinar Series V

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Session Agenda

- Session Guidelines
- Intended Audience
- Session Purpose
- HHS-RADV Timeline
- Overview of the Attestation and Discrepancy Reporting Processes
- Understanding the HHS-RADV SVA Findings Report
- Completing the SVA Findings Report Attestation and Discrepancy Reporting Form
- Medical Record Recommendations on Abstraction
- Question and Answer (Q&A)
- Resources
- Closing Remarks

Session Guidelines

- This is a 60-minute webinar session
- Stakeholders may now listen to today's event via their computer speakers or telephone
 - To listen through your computer speakers, please ensure your computer volume is not muted
 - To listen through your telephone, dial 1-866-442-5690 and enter your unique six-digit Personal Identification Number (PIN)
- If you cannot hear today's audio or are having other technical issues, please contact the Registrar at registrar@regtap.info or (800) 257-9520

Session Guidelines (continued)

- To submit a question during today's webinar
 - Type into the Q&A panel on the lower, right-hand side of your screen
 - Hit the Send button to submit your question to CMS
- Please email additional content questions to CCIIOACARADDataValidation@cms.hhs.gov
- For questions regarding logistics and registration, please contact the Registrar at registrar@regtap.info or (800) 257-9520

Intended Audience

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

Session Purpose

- For the Centers for Medicare & Medicaid Services (CMS) to provide an overview of the 2018 Benefit Year HHS-RADV SVA Findings Report Attestation and Discrepancy Reporting, as well as to provide medical record recommendations on abstraction

HHS-RADV Timeline

HHS-RADV Timeline



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

www.REGTAP.info/hhsradv.php

Overview of the Attestation and Discrepancy Reporting Processes

Timeline for SVA Findings Report Attestation and Discrepancy Reporting

Mid-January – March 6

- Pairwise Test Results Emails sent to issuers indicating sufficient or insufficient agreement between IVA and SVA results
 - Request for Package 3 sent if insufficient agreement is determined

April 1

- All issuers receive a “Final Pairwise Results - Sufficient or Insufficient Agreement” email; Issuers with insufficient agreement between IVA and SVA findings will also be provided an HHS-RADV SVA Findings Report in the Audit Tool
- SVA Findings Report Attestation and Discrepancy Reporting Window Opens (Discrepancy Window 1)
 - *Only applicable for issuers with insufficient agreement between IVA and SVA results*

April 30

- SVA Findings Report Attestation and Discrepancy Reporting Window Closes (Discrepancy Window 1)

May

- CMS will review submitted discrepancies and notify the issuer of the Discrepancy Resolution Results

HHS-RADV Attestation and Discrepancy Reporting Processes

- Consistent with 45 C.F.R. § 153.640(d)(2), within 30 calendar days of notification by HHS of the SVA findings (if applicable) or the calculation of a risk score error rate, an issuer must confirm the SVA findings or the calculation of a risk score error rate, or file a discrepancy report to dispute the SVA findings or the calculation of a risk score error rate
- There are two (2) attestation and discrepancy reporting processes
 - The SVA findings (if applicable), and
 - The calculation of a risk score error rate
- **This presentation will focus on the first attestation and discrepancy reporting process related to the SVA findings for issuers with insufficient pairwise agreement between the IVA and the SVA**

HHS-RADV Attestation and Discrepancy Reporting Processes

(continued)

Discrepancy Window	Purpose	Issuers Required to Participate	Action Required by Eligible Issuers
HHS-RADV SVA Findings Attestation and Discrepancy Reporting (Discrepancy Window 1)	Attest to the <i>HHS-RADV SVA Findings Report</i> Resolve Hierarchical Condition Category (HCC)-specific discrepancies between IVA and SVA results	Only issuers who have Health Insurance Oversight System (HIOS) ID(s) with insufficient pairwise means test agreement between the IVA and SVA results	Attest to <i>HHS-RADV SVA Findings Report</i> or qualify the attestation with a discrepancy in the Audit Tool
Risk Score Error Rate Calculation Attestation and Discrepancy Reporting (Discrepancy Window 2)	Attest to the results of the Risk Score Error Rate Calculation in the Final 2018 benefit year Risk Adjustment Data Validation (RADV) Findings Report Resolve discrepancies related to Risk Score Error Rate Calculation	All issuers who participated in 2018 RADV	Attest to Final 2018 benefit year RADV Findings or qualify the attestation with a discrepancy in the Audit Tool

Guidance for Attesting to *HHS-RADV SVA Findings Report*

- HHS-RADV SVA Findings Report Attestation and Discrepancy Reporting
 - If the issuer does not dispute the *HHS-RADV SVA Findings Report*, the issuer is required to attest to the *HHS-RADV SVA Findings Report* within 30 calendar days from the date of the *HHS-RADV SVA Findings Report*
 - Issuers with HIOS ID(s) with insufficient pairwise agreement must attest or qualify the attestation with a discrepancy by **April 30, 2020**
- All attestations must be provided by an individual who can legally and financially bind the organization

**Refer to 2018 Benefit Year HHS-RADV Protocols:
Section 12.2 (Attestations)**

Understanding the HHS-RADV SVA Findings Report

Communications Prior to SVA Findings Report Attestation and Discrepancy Reporting Process

- Between January and March, CMS is sending email notifications on a rolling basis to issuers indicating the outcome of the pairwise means test
 - Either the HIOS ID has sufficient agreement between the IVA and SVA pairwise means test results (IVA results used for error estimation); or
 - There is insufficient agreement between the IVA and SVA pairwise means test results (SVA results used for error estimation) at the SVA100 subsample level – this email will request Package 3
- Issuers may receive multiple emails from CMS, as the emails are HIOS ID-specific

Communications Prior to SVA Findings Report Attestation and Discrepancy Reporting Process (continued)

- On April 1, 2020, CMS will send issuers an email that lists the company's HIOS IDs that have sufficient agreement between the IVA and SVA pairwise means test results
 - “Summary of Final Pairwise Results – Sufficient Agreement” email
- On April 1, 2020, CMS will also send issuers an email that lists the company's HIOS IDs that have insufficient agreement between the IVA and SVA pairwise means test results
 - “Summary of Final Pairwise Results – Insufficient Agreement” email

Summary of Final Pairwise Results – Insufficient Agreement Email

- The **Summary of Final Pairwise Results – Insufficient Agreement email** will contain directions for issuers to download their *HHS-RADV SVA Findings Report*, along with instructions on how to access the SVA Findings Report Attestation and Discrepancy Form in the Audit Tool
 - Issuers can attest to all HIOS ID(s) with insufficient agreement if they have no discrepancies to report
 - Issuers can report one (1) or more discrepancies as necessary
 - Issuers can submit to CMS the required supporting documentation for a discrepancy (as requested by CMS)

Who will receive the *HHS-RADV SVA Findings Report*?

- Only issuers with HIOS ID(s) that have insufficient pairwise means test agreement as a result of the pairwise means test analysis will receive an *HHS-RADV SVA Findings Report after final validation for all HCC deviations*
 - Issuers who have sufficient pairwise means test agreement between the IVA and SVA results will not receive an HHS-RADV SVA Findings Report and do not need to complete this attestation and discrepancy reporting process

Locating *HHS-RADV SVA Findings Report*

- The *HHS-RADV SVA Findings Report* is available for Issuer SOs to download from HHS-RADV SVA Findings Attestation and Discrepancy Form
- The HHS-RADV SVA Findings Report zip file contains the following two (2) reports in csv format:
 - SVA Findings – Summary
 - Insufficient Agreement Pairwise Report

HHS-RADV SVA Findings Report – SVA Findings – Summary

- The SVA Findings – Summary contains:
 - At the company level, every enrollee from the SVA for all HIOS ID(s) that had insufficient pairwise agreement who were included in the final insufficient pairwise agreement analysis and who had at least one (1) substantiated medical record
 - A listing of each medical record ID with the validation status
 - Medical records are either valid or invalid
 - A medical record is invalid due to either demographic and enrollment failure or claim failure

HHS-RADV SVA Findings Report – SVA Findings – Summary (continued)

- The SVA Findings – Summary

	A	B	C	D	E	F	G	H
1	HIOS ID	Enrollee ID	IVA HCCs	SVA HCCs	IVA Enrollee Risk Score	SVA Risk Score	MR ID	MR Validation Status
2	12345	E1	20, 50	19, 50	21.2	16.425	MR 1	
3	12345	E1	20, 50	19, 50	21.2	16.425	MR 2	Demographic Enrollment Fail
4	12345	E2	1, 2, 7, 10	1, 2, 7, 10	14.65	14.65	MR 11	
5	12345	E2	1, 2, 7, 10	1, 2, 7, 10	14.65	14.65	MR 22	
6	54321	E3	8, 156	156	9.3654	8.536541	MR 1111	
7	54321	E3	8, 156	156	9.3654	8.536541	MR 222	
8	54321	E3	8, 156	156	9.3654	8.536541	MR 3	Demographic Enrollment Fail
9	54321	E3	8, 156	156	9.3654	8.536541	MR 4	Claim Fail

HHS-RADV SVA Findings Report – Insufficient Agreement Pairwise Report

- The Insufficient Agreement Pairwise Report contains:
 - At the company level, one (1) row for each HCC deviation
 - Each HCC deviation is assigned a unique System ID that will be used as an identifier
 - There are two (2) possible HCC deviations:
 - IVA HCC that was not substantiated by the SVA; and
 - SVA HCC not submitted by the IVA
 - An error category and Additional Error Category (as applicable), determined by the SVA, for each HCC deviation, and error comments if the Error Category is *Other*

HHS-RADV SVA Findings Report – Insufficient Agreement Pairwise Report (continued)

- The Insufficient Agreement Pairwise Report

	A	B	C	D	E	F	G	H
1	System ID	HIOS ID	Enrollee ID	HCC Deviation	HCC Deviation Type	Error Category	Additional Error Category	Error Comments
2	DV-001	12345	abc123	34	IVA HCC not substantiated By SVA	DX not found in documentation provided		
3	DV-002	12345	abc123	188	IVA HCC not substantiated By SVA	Demographic error		
4	DV-003	12345	abc123	203	IVA HCC not substantiated By SVA	Invalid Signature	Demographic error	
5	DV-004	12345	abc126	45	SVA HCC not submitted by IVA	Coding error	Other	Coded against the rules
6	DV-005	12345	abc127	248	SVA HCC not submitted by IVA	Coding error		
7	DV-006	12345	abc127	249	IVA HCC not substantiated By SVA	DX not found in documentation provided		
8	DV-007	12345	abc130	1	IVA HCC not substantiated By SVA	Invalid Signature	Coding error	
9	DV-008	12345	abc130	45	IVA HCC not substantiated By SVA	Demographic error		
10	DV-009	12345	abc130	126	SVA HCC not submitted by IVA	Coding error	Demographic error	
11	DV-010	12345	abc130	161	IVA HCC not substantiated By SVA	Other		There was an error in coding
12	DV-011	12345	abc130	209	IVA HCC not substantiated By SVA	Other		Not a good code
13	DV-012	12345	xyz4	57	SVA HCC not submitted by IVA	Other		There were some other issues
14	DV-013	12345	xyz5	4	SVA HCC not submitted by IVA	Other		Coded against the rules
15	DV-014	12345	xyz6	36	IVA HCC not substantiated By SVA	Coding error		
16	DV-015	12345	xyz6	205	IVA HCC not substantiated By SVA	Invalid Signature		
17	DV-016	12345	xyz6	217	SVA HCC not submitted by IVA	Coding error		

Completing the SVA Findings Report Attestation and Discrepancy Reporting Form

Timing of SVA Findings Report Attestation and Discrepancy Reporting Process

- Opens **April 1, 2020** and closes **April 30, 2020**
- Only issuers with HIOS ID(s) who have insufficient pairwise means test agreement must complete this process

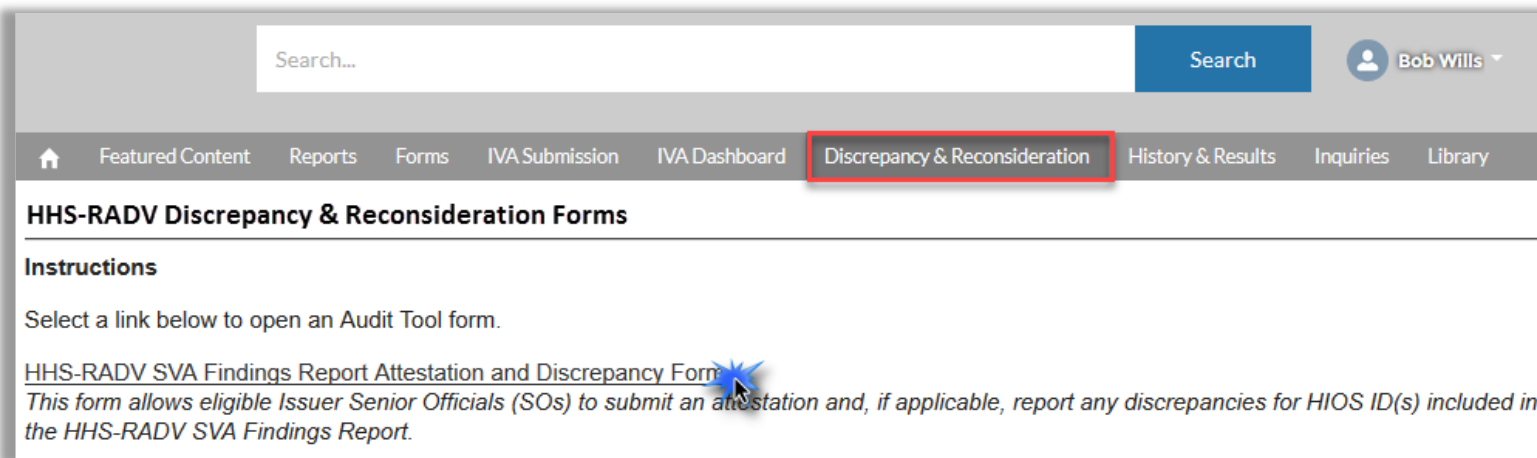


*Issuers with sufficient pairwise agreement **do not** have to complete this process, since IVA findings will be used for the HCC Grouping and risk score error rate calculations, and issuers have already attested to those IVA results during the IVA submission process*

- Issuers who have insufficient pairwise means test agreement have until **April 30, 2020** to submit the completed HHS-RADV SVA Findings Report Attestation and Discrepancy Reporting Form within the Audit Tool
- CMS will then review any discrepancies submitted and notify the issuer of the Discrepancy Resolution Results

Accessing the SVA Findings Report Attestation and Discrepancy Reporting Form

- Log into the Audit Tool and select the *Discrepancy & Reconsideration* tab
- Select the **HHS-RADV SVA Findings Attestation and Discrepancy Form** link



The screenshot shows the top navigation bar of the Audit Tool. A search bar is on the left, and a user profile 'Bob Wills' is on the right. The main navigation menu includes: Home, Featured Content, Reports, Forms, IVA Submission, IVA Dashboard, **Discrepancy & Reconsideration** (highlighted with a red box), History & Results, Inquiries, and Library. Below the menu, the section is titled 'HHS-RADV Discrepancy & Reconsideration Forms'. Under 'Instructions', it says 'Select a link below to open an Audit Tool form.' A link is provided: [HHS-RADV SVA Findings Report Attestation and Discrepancy Form](#). Below the link, a note states: 'This form allows eligible Issuer Senior Officials (SOs) to submit an attestation and, if applicable, report any discrepancies for HIOS ID(s) included in the HHS-RADV SVA Findings Report.'



Only the Issuer SO and Back-up SO will have access to this form in the Audit Tool

Accessing the HHS-RADV SVA Findings Report Attestation and Discrepancy Form User Guide

- CMS has developed the HHS-RADV SVA Findings Report Attestation and Discrepancy Form User Guide, which contains detailed instructions for attesting to the *HHS-RADV SVA Findings Report* or qualifying the attestation with a discrepancy
- The HHS-RADV SVA Findings Report Attestation and Discrepancy Form User Guide is available by selecting the **Guidance** link in the upper right-hand corner of the *Welcome* page of the form

Accessing the *HHS-RADV SVA Findings Report*

- On the *Welcome* page of the form, select the **2018 HHS-RADV SVA Findings Report** link



[Guidance](#)

Welcome

The 2018 HHS-RADV SVA Findings Report Attestation and Discrepancy form allows eligible issuers¹ to attest to the accuracy of their HHS-RADV SVA Findings Report, qualify this attestation with any discrepancies, and/or upload additional information requested by CMS.

CMS provides the *HHS-RADV SVA Findings Report* to eligible issuers who must attest or qualify an attestation with a discrepancy by April 20, 2020. Select the link to the 2018 *HHS-RADV SVA Findings Report* below to download and review.

If a discrepancy is determined, complete the 2018 HHS-RADV SVA Findings Report Attestation and Discrepancy form and include the following additional information to CMS regarding the discrepancy:

- Dispute Type
- Explanation
- Medical Record (MR) ID
- MR Filename
- PDF Page Number
- Discrepancy Description
- Coding Reference

For additional information and instructions for completing this form, a User Guide is available in the audit tool library and can be accessed by selecting the [Guidance](#) link in the upper right-hand corner of this page.

To upload additional information to support a reported discrepancy; however, an upload cannot include any additional medical records.

Note: This form must be completed in one session, and may only be completed once. We recommend that you have all information gathered prior to beginning the form.

Instructions

Select the link to download the *HHS-RADV SVA Findings Report*. Hover over the password below to reveal the encryption password used to protect the report. After review of the report and collection of all necessary information, select the **Continue** button to access the form.

Password:

[Continue](#)

Accessing the *HHS-RADV SVA Findings Report* (continued)

- Hover over the Password to reveal the encryption password used to protect the report

Instructions

Select the link to download the *HHS-RADV SVA Findings Report*. Hover over the password below to reveal the encryption password used to protect the report. After review of the report and collection of all necessary information, select the **Continue** button to access the form.

Password: abc123!

[2018 HHS-RADV SVA Findings Report](#)

Continue

Accessing the *HHS-RADV SVA Findings Report* (continued)

- After reviewing the report and collecting all necessary information, select the **Continue** button

Instructions

Select the link to download the *HHS-RADV SVA Findings Report*. Hover over the password below to reveal the encryption password used to protect the report. After review of the report and collection of all necessary information, select the **Continue** button to access the form.

Password: 

[2018 HHS-RADV SVA Findings Report](#)

Continue 



- This form must be completed in one (1) session, and may only be completed once
- It is strongly recommended that you review the *HHS-RADV SVA Findings Report* and gather all supporting information prior to completing the form

HHS-RADV SVA Findings Attestation and Discrepancy Options Page

- There are three (3) HHS-RADV SVA Findings and Discrepancy Options:
 - If you have no discrepancies to report for any eligible HIOS ID, select ***I want to attest for all HIOS ID(s) as I have no discrepancies to report***
 - If you have one (1) or more discrepancies to report, select ***I want to report at least one discrepancy and submit an attestation***
 - If you received a request from CMS for supporting documentation, select ***I want to submit CMS requested supporting documentation for a discrepancy***

Attest with No Discrepancies

- **HHS-RADV SVA Findings Attestation and Discrepancy Options Page**
 - Select the *I want to attest for all HIOS ID(s) as I have no discrepancies to report* radio button
 - Select the **Continue** button to navigate to the *Summary* page

What would you like to do?*

- ☒ I want to attest for all HIOS ID(s) as I have no discrepancies to report.
- ☐ I want to report at least one discrepancy and submit an attestation.

Exit

Continue

Attest with No Discrepancies (continued)

- **Summary Page**

- Review the Attestation Summary table, which displays HCC Deviations for which no discrepancies were reported
- Select the **Continue** button to navigate to the *Attestation* page

Attestation Summary

The Attestation Summary table displays HCC Deviations for which no discrepancies were reported. Select the **Report Additional Discrepancies** button if you have additional discrepancies to report.

System ID	HIOS ID	Enrollee ID	HCC Deviation	HCC Deviation Type	Error Category	Additional Error Category	Error Comments
SVA-Findings-9200	03450	pkltFXvjNLIDBk	20	SVA HCC not submitted by IVA	Coding error		
SVA-Findings-9201	03450	5nMcq2yv0scOxk	41	SVA HCC not submitted by IVA	DX appears to be coded from a problem list/PMH only		
SVA-Findings-9202	03450	OoxlUI67CHFg7R	41	IVA HCC not substantiated by SVA	DX appears to be coded from a radiology/pathology report		

Attest with No Discrepancies (continued)

- **Attestation Page**

- Select the check box next to each attestation statement
- Enter the Attester details, and select the **Submit** button

Attestation

On behalf of the company identified on this form, I hereby attest and certify that, for the HIOS ID(s) listed on this form, to the best of my information, knowledge, and belief as of 3/4/2020:

- ☒ * Qualified by any discrepancy reported herein, I confirm and attest to the accuracy of the 2018 HHS-RADV SVA Findings Report for the HIOS ID(s) listed on the Summary page of this form.
- ☒ * The information provided in this submission is true, complete, and accurate.
- ☒ * I acknowledge that the submission of data to CMS upon which the HCC failure rate and error rate estimation methodology are calculated may be subject to the provisions of the False Claims Act, 31 U.S.C. § 3729, et. seq., which generally prohibits the intentional submission of a false claim to the government, or the knowing submission of a false record or statement to get a false claim paid by the government, and/or 18 U.S.C § 1001, which prohibits the submission of materially false statements or information to Federal executive agencies.
- ☒ * If my organization becomes aware that any of the information contained in this form is incorrect, my organization will promptly inform CMS.
- ☒ * I am authorized to legally and financially bind my organization.



NOTE

The individual providing the attestation must be someone who can legally and financially bind the company

Attest with No Discrepancies (continued)

- **Confirmation Page**

- Provides the submission end time – date and time was submitted
- At this time, an acknowledgement email and submission information will be sent to the Issuer SO, Back-up Issuer SO, and Attester
- On this page, a **PDF** button generates a PDF containing all the HIOS ID number(s) submitted for attestation



It is recommended that you print and save a copy of the confirmation information for your records

Report Discrepancies and Attest

- HHS-RADV SVA Findings Attestation and Discrepancy Options Page
 - Select the *I want to report at least one discrepancy and submit an attestation* radio button
 - Select the **Continue** button to navigate to the *Report Discrepancy* page

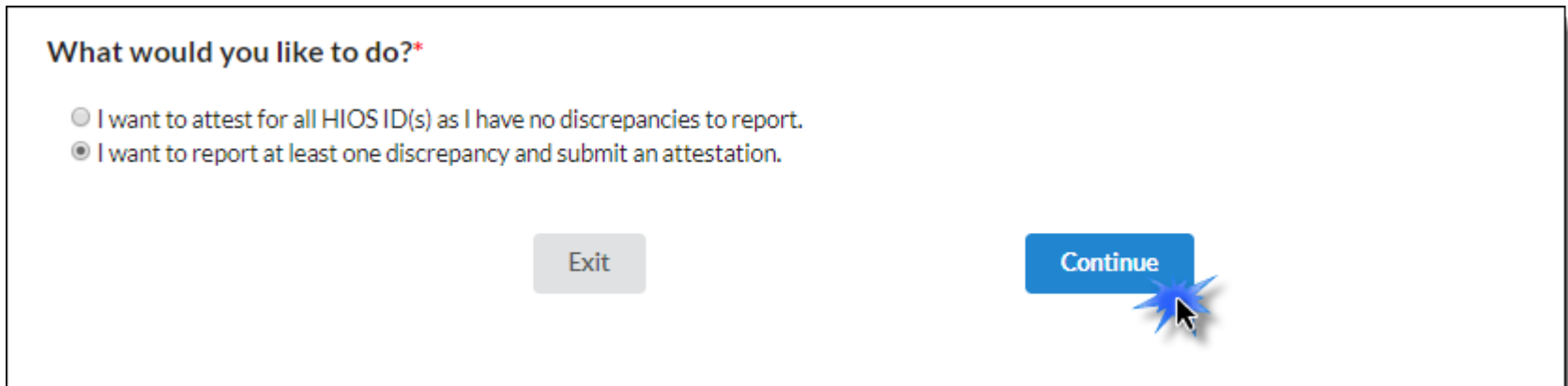
What would you like to do?*

☐ I want to attest for all HIOS ID(s) as I have no discrepancies to report.

☒ I want to report at least one discrepancy and submit an attestation.

Exit

Continue



Report Discrepancies and Attest

(continued)

- **Report Discrepancy Page**

- Contains the Discrepancy Table, which displays information from the *HHS-RADV SVA Findings Report* for each item

- To report a discrepancy, select the **Add Discrepancy** link in the Action column
 - Select the appropriate link in the Action column to **Edit**, **Delete**, or **View** a discrepancy that has been added, as needed

Report Discrepancies and Attest

(continued)

- Report Discrepancy Page: Discrepancy Table

Discrepancy Table 

Search:

Action	System ID	HIOS ID	Enrollee ID	HCC Deviation	HCC Deviation Type	Error Category	Additional Error Category	Error Comments	Discrepancy (Y/N)
Add Discrepancy	SVA-Findings-9200	03450	pkltFXvjNLIDBk	20	SVA HCC not submitted by IVA	Coding error			N
Add Discrepancy	SVA-Findings-9201	03450	5nMcq2yv0scOxk	41	SVA HCC not submitted by IVA	DX appears to be coded from a problem list/PMH only			N
Add Discrepancy	SVA-Findings-9202	03450	OoxlUI67CHFg7R	41	IVA HCC not substantiated by SVA	DX appears to be coded from a radiology/pathology report			N

Back

Continue

Report Discrepancies and Attest

(continued)

- **Discrepancy Information Page**

- Complete the required fields to provide details about the discrepancy:

- **Dispute Type** – Documentation, Coding Guidance, and Other
 - **Other Explanation** – Required if Dispute Type is Other
 - **MR ID** – Drop down of options from your Package 2 and 3 files
 - **MR Filename** – Drop down of options from your Package 2 and 3 files
 - **PDF Page Number** – Page citation
 - **Discrepancy Description** – Additional details to support discrepancy
 - **Coding Reference** – Enter coding reference comments related to your interpretation of the relevant coding guidance (required if Coding Guidance is selected for Dispute Type)

Report Discrepancies and Attest

(continued)

- Discrepancy Information Page

System ID: SVA-Findings-9108
HIOS ID: 05677
Enrollee ID: paYSwWobPBqEYy
HCC Deviation: 11
HCC Deviation Type: IVA HCC not substantiated by SVA
Error Category: Electronic Signature not Authenticated
Additional Error Category:
Error Comments:

Dispute Type *

Documentation

Other Explanation

MR ID *

1373MRID8047

VALID

MR Filename *

MR Document889390.pdf

PDF Page Number *

3

Discrepancy Description *

This is a discrepancy description.

Coding Reference

Report Discrepancies and Attest

(continued)

- **Summary Page**

- Review the Discrepancy Summary table, which displays the discrepancies that will be reported to CMS
- Review the Attestation Summary table, which displays HCC Deviations for which no discrepancies were reported

Report Discrepancies and Attest

(continued)

- Summary Page

Discrepancy Summary

The Discrepancy Summary table displays all of the discrepancies that will be reported to CMS. Select the appropriate link in the Action column to **View**, **Edit**, or **Delete** a discrepancy as needed. Select the **Report Additional Discrepancies** button if you have additional discrepancies to report.

Search:

Action	System ID	HIOS ID	Enrollee ID	Dispute Type	MR ID	MR Filename	PDF Page Number	Discrepancy Description	Coding Reference
View Edit Delete	SVA-Findings-9102	05677	SJ50TG7CnzgbXC	Coding Guidance	8409MRID6485	MR Document594303.pdf	443	fdgfdg	gfdgfdgfd
View Edit Delete	SVA-Findings-9108	05677	paYSwWobPBqEYy	Documentation	1373MRID8047	MR Document889390.pdf	3	This is a discrepancy description.	

Attestation Summary

The Attestation Summary table displays HCC Deviations for which no discrepancies were reported. Select the **Report Additional Discrepancies** button if you have additional discrepancies to report.

System ID	HIOS ID	Enrollee ID	HCC Deviation	HCC Deviation Type	Error Category	Additional Error Category	Error Comments
SVA-Findings-9168	05672	VFWA22pdDu4gUj	1	SVA HCC not submitted by IVA	Invalid Signature / No Signature		
SVA-Findings-9169	05672	Pc1bhkfrRDXNI1	37.2	SVA HCC not submitted by IVA	Invalid Signature / No Signature	Illegible handwriting	

Report Discrepancies and Attest

(continued)

- **Summary Page**

- Select the **Upload Attachment** button to upload documents in support of reported discrepancies
- Review the Attachment Summary, which displays the attachments that have been uploaded

Attachment Summary

Select the **Upload Attachment** button to upload files to support one or more reported discrepancies. Uploaded attachments will be displayed in the Attachment Summary table. Select the appropriate link in the Action column to **View**, **Edit**, or **Delete** an uploaded attachment, as needed. It is also possible to upload additional information to support a reported discrepancy; however, an upload cannot include any additional medical records.

Issuers should **not** submit additional medical record documentation or supplemental documentation that was not provided during the IVA Results Submission process to CMS and the SVA Entity as part of this discrepancy reporting process.

Action	Filename	File Size	Associated System ID(s)
View Edit Delete	SVA Findings.zip	0.0858 MB	SVA-Findings-9102

Upload Attachment



Report Discrepancies and Attest

(continued)

- **Acceptable Supporting Documentation**

- CMS will not accept additional source documentation that was not previously submitted to CMS and the SVA Entity during the IVA results submission process, such as additional medical records or screenshots
- Issuers are strongly encouraged to reference the following documentation as a part of the submitted discrepancy:
 - Documentation available to CMS and the SVA Entity during the SVA process
 - Publicly available reference materials (e.g., coding clinic references)
 - IVA Entity coder notes created during the IVA audit to support findings
- CMS may request that issuers submit additional documentation including reference material or other supplemental evidence in support of the discrepancy

Report Discrepancies and Attest

(continued)

- **Summary Page**

- Select the **Report Additional Discrepancies** button to report any additional discrepancies (as needed)
- Select the **Continue** button to navigate to the *Attestation* page once all discrepancies have been added

Do you have any other discrepancies to submit? If no, click Continue; if yes, click Report Additional Discrepancies.

Exit

Report Additional Discrepancies

Continue

Report Discrepancies and Attest

(continued)

- **Attestation Page**

- Select the check box next to each attestation statement
- Enter the Attester details, and select the **Submit** button

Attestation

On behalf of the company identified on this form, I hereby attest and certify that, for the HIOS ID(s) listed on this form, to the best of my information, knowledge, and belief as of 3/4/2020:

- ☒ * Qualified by any discrepancy reported herein, I confirm and attest to the accuracy of the 2018 HHS-RADV SVA Findings Report for the HIOS ID(s) listed on the Summary page of this form.
- ☒ * The information provided in this submission is true, complete, and accurate.
- ☒ * I acknowledge that the submission of data to CMS upon which the HCC failure rate and error rate estimation methodology are calculated may be subject to the provisions of the False Claims Act, 31 U.S.C. § 3729, et. seq., which generally prohibits the intentional submission of a false claim to the government, or the knowing submission of a false record or statement to get a false claim paid by the government, and/or 18 U.S.C § 1001, which prohibits the submission of materially false statements or information to Federal executive agencies.
- ☒ * If my organization becomes aware that any of the information contained in this form is incorrect, my organization will promptly inform CMS.
- ☒ * I am authorized to legally and financially bind my organization.



The individual providing the attestation must be someone who can legally and financially bind the company

Report Discrepancies and Attest

(continued)

- **Confirmation Page**

- Provides the submission end time – date and time attestation and discrepancies were submitted
- At this time, an acknowledgement email and submission information will be sent to the Issuer SO, Back-up Issuer SO, and Attester
- On this page a **PDF** button generates a PDF containing all the HIOS ID number(s) submitted for attestation and if applicable, associated reported discrepancies



It is recommended that you print and save a copy of the confirmation information for your records

Submit CMS Requested Supporting Documentation

- **HHS-RADV SVA Findings Attestation and Discrepancy Options Page**
 - CMS will send an email notification requesting additional documentation in support of a reported discrepancy, if needed
 - Select the ***I want to submit CMS requested supporting documentation for a discrepancy*** radio button
 - Select the **Continue** button to navigate to the *CMS Requested Supporting Documentation* page

Submit CMS Requested Supporting Documentation (continued)

- **HHS-RADV SVA Findings Attestation and Discrepancy Options Page**

What would you like to do?*

- ☐ I want to attest for all HIOS ID(s) as I have no discrepancies to report.
- ☐ I want to report at least one discrepancy and submit an attestation.
- ☒ I want to submit CMS requested supporting documentation for a discrepancy.

Exit

Continue



Submit CMS Requested Supporting Documentation (continued)

- **CMS Requested Supporting Documentation Page**
 - Select a System ID to link to the attachment
 - Select the **Browse/Choose File** button to locate your encrypted zip file, then select the **Upload Attachment** button
 - Repeat these steps as needed to upload an encrypted zip file for each System ID

Submit CMS Requested Supporting Documentation (continued)

- **CMS Requested Supporting Documentation Page**

- Provide an explanation if you do not have a new/replacement file to upload
- Select the **Submit** button to navigate to the *Confirmation* page



If an Original File is provided, the Replacement Filename needs to be the same as the Original Filename

Submit CMS Requested Supporting Documentation (continued)

- **Confirmation Page**

- Provides the submission end time – date and time CMS Requested Supporting Documentation was submitted
- At this time, an acknowledgement email and submission information will be sent to the Issuer SO and Back-up Issuer SO
- On this page, a **PDF** button generates a PDF containing a summary of the documentation submitted



It is recommended that you print and save a copy of the confirmation information for your records

Discrepancy Resolution Results

- CMS will review all discrepancies and provide issuers with Discrepancy Resolution Results, referencing the Discrepancy ID(s) and CMS's final decision
- The Discrepancy Resolution Results will be provided to the Issuer SO, Backup SO, and Attester

Medical Record Recommendations on Abstraction

RADV Medical Record Documentation

Required Medical Record Documentation

- For all inpatient medical records, providers should submit at minimum all the progress notes, history and physical, and the discharge summary for the enrollees under review
 - Authenticated signature & acceptable credentials should **always** be provided within all submitted medical records
- Per Section 9.8.9 of the 2018 Benefit Year HHS-RADV Protocols, the following documentation **should not** be submitted to CMS:
 - The CMS Medical Record Provider Request Memo
 - Data retrieval company memos
 - Nurse's notes, lab results, flowsheets, photos (including photos of wounds or infants), discharge instructions, and medication administration records
 - Duplicate medical records

Diagnosis Abstraction Tips

Diagnosis Abstraction Tips

- Diagnoses on an inpatient medical record that contain a discharge date outside of the benefit year being audited cannot be abstracted (*Section 9.8.6.1 of the 2018 Benefit Year HHS-RADV Protocols*)
- Only legible handwritten medical records should be submitted
 - If the documentation is in question, a work paper documenting the professional judgment used should be submitted (*Section F of the 2018 Benefit Year HHS-RADV Protocols*)
- A discharge/death summary must sufficiently support the diagnoses submitted
 - Often times, discharge summaries only contained a “listing” of diagnoses without any additional documentation provided to substantiate an HCC (*Section 9.8.13 of the 2018 Benefit Year HHS-RADV Protocols*)

Diagnosis Abstraction Tips *(continued)*

Diagnosis Abstraction Tips

- Pathology, Radiology and Echocardiogram reports cannot be used to substantiate a diagnosis. These reports may be used in conjunction with a valid medical record (*Section 9.8.9 of the 2018 Benefit Year HHS-RADV Protocols*)
- Only submit medical records that have valid signatures and credentials for the provider in the state which they are practicing, or a valid attestation for that encounter. Verify that the attestation submitted matches the identity of the author of the medical record submitted (*Appendix F of the 2018 Benefit Year HHS-RADV Protocols*)
- Do not abstract diagnoses from the Past Medical History (PMH) section of a medical record unless abstracting diagnoses that map to an HCC found on the HHS-RADV Lifelong Permanent Conditions List (*Appendix E of the 2018 Benefit Year HHS-RADV Protocols*)

Q&A

Q&A

- To submit a question during today's webinar
 - Type into the Q&A panel on the lower, right-hand side of your screen
 - Hit the Send button to submit your question to CMS



If your question does not receive a response during this webinar session, please submit your question to the CMS RADV team at CCIIOACARADDataValidation@cms.hhs.gov

Resources

Locating HHS-RADV Documents in REGTAP

- Stakeholders can access additional documents in the REGTAP library at <https://www.REGTAP.info>
 - Under Program Area, select **HHS Risk Adjustment Data Validation (HHS-RADV)**

The screenshot shows the REGTAP Library interface. The 'Filter by:' dropdown menu is open, displaying a list of program areas. A red arrow points to the 'HHS-Operated Risk Adjustment Data Validation (RADV)' option. The main table displays a list of resources with columns for Program Area, Resource Type, and Download links.

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

Upcoming Webinar

Topic	Date
Updates to the HHS-RADV Sampling Logic and RADV Population Summary Statistics (RADVPS) Report Review	April 1, 2020

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)	http://www.cms.gov/ccio
Consumer Website on Health Reform	http://www.healthcare.gov/
Registration for Technical Assistance Portal (REGTAP)	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
HHS Notice of Benefit and Payment Parameters for 2019	https://www.govinfo.gov/content/pkg/FR-2018-04-17/pdf/2018-07355.pdf
HHS Notice of Benefit and Payment Parameters for 2020	https://www.federalregister.gov/public-inspection/2019/04/18#special-filing-health-and-human-services-department
HHS Notice of Benefit and Payment Parameters for 2021 (Proposed Rule)	https://s3.amazonaws.com/public-inspection.federalregister.gov/2020-02021.pdf

Resources: Links (continued)

Resource	Resource Link
Overview of the 2019 HHS-RADV White Paper (12/18/19)	https://www.regtap.info/reg_librarye.php?i=3146
2018 and 2019 Benefit Year HHS-RADV Timeline	https://www.regtap.info/reg_librarye.php?i=3206
2019 Benefit Year Introduction to HHS-RADV and IVA Entity Participation (3/4/20)	https://www.regtap.info/reg_librarye.php?i=3197
Issuer Exemption and Participation Requirements (3/11/20)	https://www.regtap.info/reg_librarye.php?i=3207
Issuer SO Designation and Maintenance (3/11/20)	https://www.regtap.info/reg_librarye.php?i=3208
Conflict of Interest and Issuer IVA Entity Designation (3/11/20)	https://www.regtap.info/reg_librarye.php?i=3209

Resources: Contact Information

Resource	Contact Information
For RADV policy questions, contact the RADV Team	CCIIOACARADDataValidation@cms.hhs.gov
For 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
HHS-RADV Audit Tool	To contact us within the HHS-RADV Audit Tool, use the Inquiries tab and select “Submit Inquiry”

Closing Remarks