Workpaper Documentation Example

June 28, 2017

Health Insurance Marketplace Program Training Series

CMS CENTERS FOR MEDICARE & MEDICAID SERVICES

Session Agenda

- Session Guidelines
- Intended Audience
- Session Purpose
- Announcements
- RADV Workpaper Documentation Example
- 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 session will provide an:

- Example of how the IVA Entity can complete workpaper documentation, including detailed information on:
  - Documentation requirements;
  - Required data elements;
  - Documentation workflow;
  - Workpaper tick marking options; and
  - Workpaper explanations

Announcements

Announcements

- CMS plans on releasing ICD/XML/XSD August 1, 2017 (date subject to change).
- This release is intended for the IVA submission format, required for this 2016 HHS-RADV.
- Please note that during the August 2, 2017 webinar sessions, we will presenting on ICD/XML/XSD. Please make sure to track to this webinar session and that the correct personnel is in attendance.

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

HHS-RADV Workpaper Documentation Example

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Documentation Requirements

- Audit documentation is a critical component of a successful audit program
- The IVA Entity will review and use supporting audit documentation for sampled enrollees to validate the issuer's EDGE server data
- The four (4) key documentation types are:

Mapping Documentation

Source System Documentation (Screenshots)

Workpaper Documentation

Medical Record Documentation

NOTE: Today we will discuss workpaper documentation, all other documentation listed above will be discussed in a later webinar session.

Workpaper Documentation

- Workpapers will be drafted as required throughout Phase 3 of the HHS-RADV process, Demographic and Enrollment Data (D&E) Validation
- The IVA Entity will validate the workpapers with the issuer to ensure the documentation captured in the workpaper aligns with the issuer's systems and processes

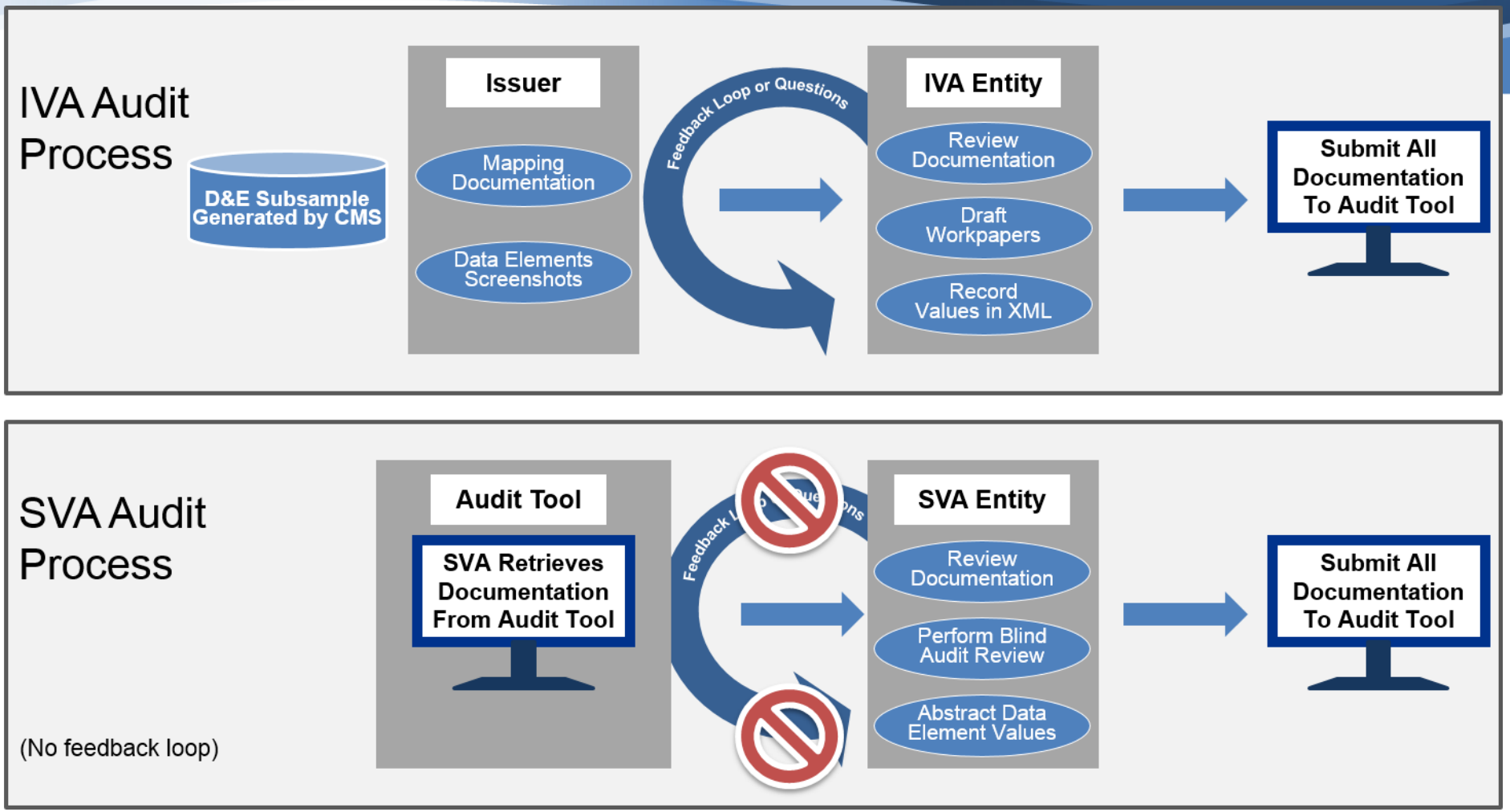
Workpaper Documentation (continued)

- Workpapers should document the IVA Entity's steps taken to validate the issuer data using the screenshot documentation and any accompanying mapping documentation
- Workpapers allow the Second Validation Audit (SVA) Entity, to re-perform the validation without having to contact the IVA entity or the issuer for an explanation



While workpapers are not expressly required to satisfy audit requirements, SVA Entity reviewers will not have access to IVA findings, nor are they able to communicate with issuers or IVA Entities to clarify documentation. Workpapers assist SVA reviewers in gaining additional insight.

Workpaper Documentation (continued)



Screenshot Face Sheet

- The Screenshot Face Sheet provides a clear and consistently formatted cover page introducing enrollee workpapers and screenshots
- Consistency across documentation files assists SVA reviewers in clearly understanding:
  - What is being validated
  - Where it is located
  - What actions were taken by the IVA Entity

Screenshot Face Sheet Example

Example File Name – File names must be unique. Otherwise, there are no specific naming convention rules for BY2016 RADV. This is an example file name only.

Client HIOS ID	Date	W/P Reference
61110	7/01/2017	61110_JDOE_D&E.pdf

Purpose

Source system screenshots were reviewed and validated for enrollees in the D&E Subsample to determine the correct EDGE submission value for the data elements required. These data elements were compared to the RADV IVA Sample Reports and confirmed with the issuer. Enrollee and source system information is detailed below:

Purpose section added by IVA Entity to provide context for the procedures performed.

Table 1 – D&E Subsample Enrollee Information

IVA Entity Review Info		D&E Subsample Information Provided by CMS	
Unique Enrollee ID	ENROLLEE1_JDOE	Gender	F
Source System Name	XXXSystem	DOB	1987-01-01
File Name	61110_JDOE_D&E.pdf	Plan ID	29089VA013000101
Primary Reviewer	Theodore Iva	Enrollment Start Date	2016-02-01
Senior Reviewer	Sammy Iva	Enrollment End Date	2016-12-31
Date of Review	7/01/2017	Enrollment Month	2016-04
		Subscriber Indicator	S

Information in the "D&E Subsample Information" section can be found in the D&E Subsample report provided by CMS. Included here to assist the SVA in identifying the enrollee Subscriber Status.

Tick Marks and Mapping

- A tick mark and Mapping Reference Table correlates the tick marks to data elements within the screenshot and indicates whether the issuer's source system captures data elements differently than the EDGE server
- The table indicates applicable mapping documentation next to each data element, which lists transformational steps applied across enrollees

Tick Marks and Mapping Reference Table Example

The tick marks in **Table 2** below correlate to the location of each data element within the screenshot provided by the issuer. These tick marks assist the SVA reviewer in identifying the correct enrollee data to validate.

In this example we are using tick marks (A – J). IVA Entities may use any identifiers as tick marks.

Table 2 – Tick Mark and Mapping Reference Table for D&E Data Elements

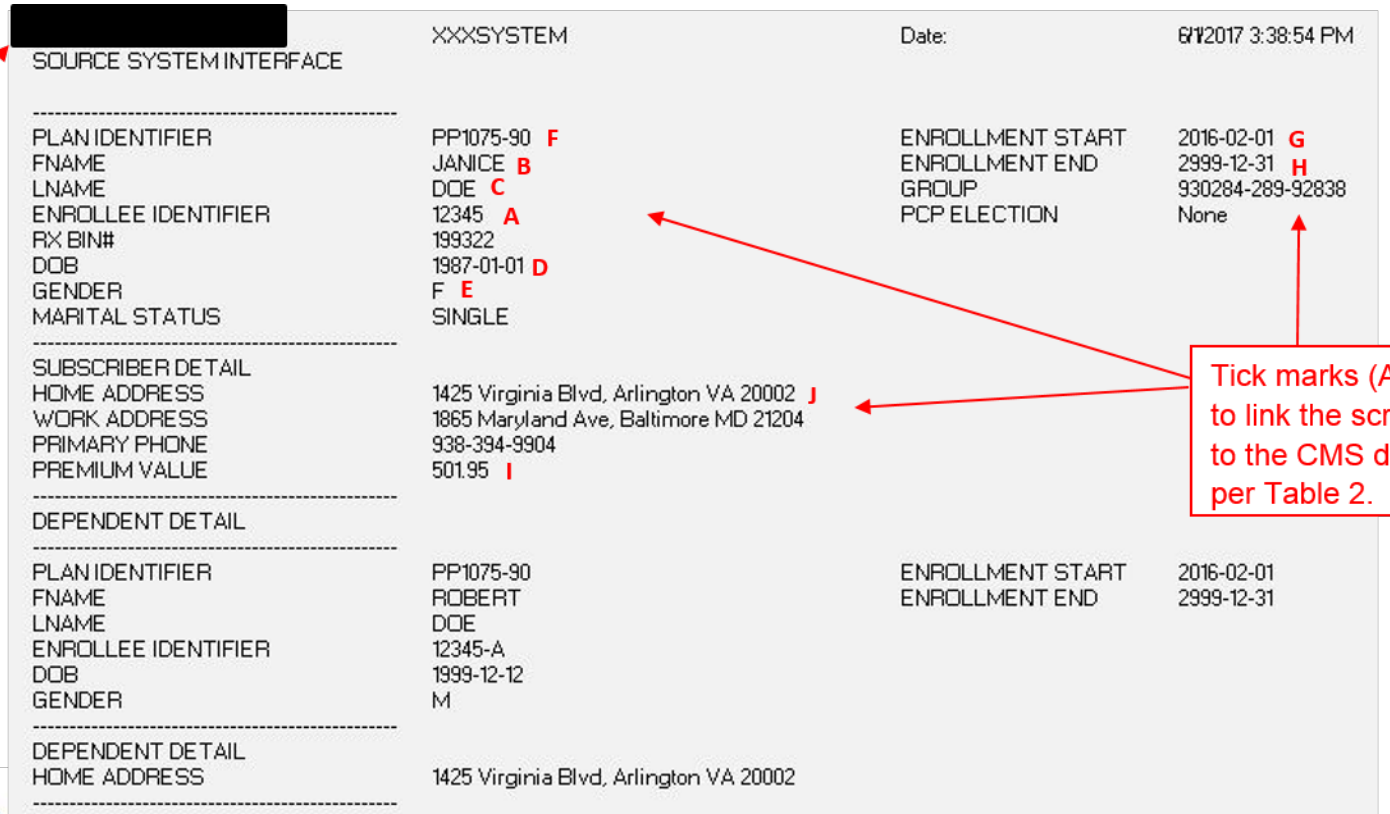
Tick Mark	Data Element	Format Change from EDGE?	Mapping Workpaper Reference
A	Member ID		
B	First Name		
C	Last Name		
D	DOB		
E	Gender		
F	Plan ID	X	61110_PlanIDMapping.pdf
G	Enrollment Start Date		
H	Enrollment End Date		
I	Premium Amount		
J	Rating Area	X	61110_RatingAreaMapping.xlsx

Enrollee Screenshot

- An Enrollee Screenshot displays the screenshot(s) of enrollee information with IVA Entity tick marks to assist SVA reviewers in identifying the correct enrollee and associated data values for validation.

Enrollee Screenshot Example

The screenshot contains both primary and dependent information. The primary information is **tick marked in red by the auditor.**



[redacted] SOURCE SYSTEM INTERFACE	XXXSYSTEM	Date:	6/1/2017 3:38:54 PM
PLAN IDENTIFIER	PP1075-90 F	ENROLLMENT START	2016-02-01 G
FNAME	JANICE B	ENROLLMENT END	2999-12-31 H
LNAME	DOE C	GROUP	930284-289-92838
ENROLLEE IDENTIFIER	12345 A	PCP ELECTION	None
RX BIN#	199322		
DOB	1987-01-01 D		
GENDER	F E		
MARITAL STATUS	SINGLE		
SUBSCRIBER DETAIL			
HOME ADDRESS	1425 Virginia Blvd, Arlington VA 20002 J		
WORK ADDRESS	1865 Maryland Ave, Baltimore MD 21204		
PRIMARY PHONE	938-394-9904		
PREMIUM VALUE	501.95 I		
DEPENDENT DETAIL			
PLAN IDENTIFIER	PP1075-90	ENROLLMENT START	2016-02-01
FNAME	ROBERT	ENROLLMENT END	2999-12-31
LNAME	DOE		
ENROLLEE IDENTIFIER	12345-A		
DOB	1999-12-12		
GENDER	M		
DEPENDENT DETAIL			
HOME ADDRESS	1425 Virginia Blvd, Arlington VA 20002		

Issuer name redacted

Tick marks (A – J) added to link the screenshot data to the CMS data elements per Table 2.

Additional IVA Explanations

- Additional IVA Entity explanations provide information to substantiate data from the screenshot
- This provides SVA reviewers with additional context to understand the process the IVA Entity used to determine a final data value

Additional IVA Explanations Example

Additional information provided to substantiate the data seen in the screenshot, which would assist the SVA reviewer in understanding the process of determining a final value

Tick Mark	Data Element	Format Change from EDGE?	Mapping Workpaper Reference
F	Plan ID	X	61110_PlanIDMapping.pdf
On-screen Plan ID maps to EDGE Plan Table, found in the mapping document indicated above.			
Tick Mark	**Data Element**	**Format Change from EDGE?**	**Mapping Workpaper Reference**
H	Enrollment End Date		
Source system end dates of 2999-12-31 are used to indicate ongoing enrollment. For purposes of EDGE Submission, enrollment end-dated to end of the benefit year (2016-12-31).			
Tick Mark	**Data Element**	**Format Change from EDGE?**	**Mapping Workpaper Reference**
I	Premium Amount		
CMS selected the month of April (2016-04) for purposes of premium validation. Enrollee is a subscriber, as such premium was validated. Monthly premium consistent throughout the benefit year at $501.95.			
Tick Mark	**Data Element**	**Format Change from EDGE?**	**Mapping Workpaper Reference**
J	Rating Area	X	61110_RatingAreaMapping.xlsx
Enrollee is a subscriber, as such Rating Area was validated. The issuer indicated that the Rating Area is determined using the County Code Mapping. We noted that the issuer uses City and Zip to identify County Code, which then corresponds to the rating area. See mapping document indicated above for City/Zip to County Code to Rating Area look-up.			

Questions

To contact us with questions, email us at:

CCIIOACARADataValidation@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)

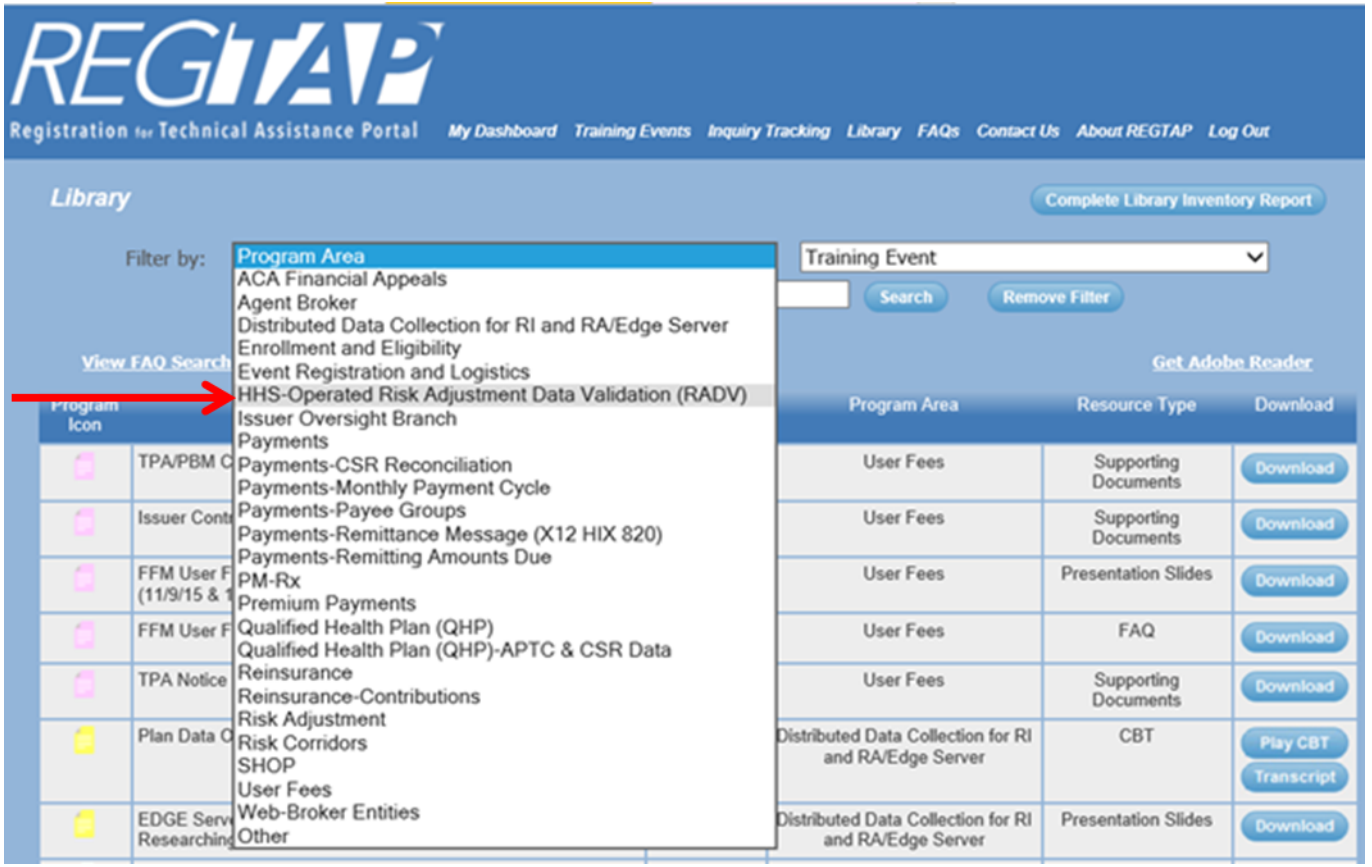
Upcoming Webinars

Date	Time	Topic
July 5, 2017	11:30 a.m. – 12:30 p.m. ET	No Session
July 12, 2017	11:30 a.m. – 12:30 p.m. ET	Question and Answer Session

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"



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

WWW.REGTAP.INFO

Resources: Contact Information

Resource	Contact Information
For RADV policy questions, contact the RADV Team.	CCIIOACARADataValidation@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/cciio
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 (ACA)	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