## **CMS Manual System**

# **Pub 100-08 Medicare Program Integrity**

**Transmittal 126** 

Department of Health & Human Services (DHHS)

Center for Medicare & Medicaid Services (CMS)

Date: OCTOBER 21, 2005 CHANGE REQUEST 3994

SUBJECT: Implementation of Program Safeguard Contractor (PSC) Access to the VIPS Medicare Shared System (VMS) at All Durable Medical Equipment Carriers (DMERCs)

**I. SUMMARY OF CHANGES:** VMS implemented the capability for a PSC to have full access to DMERC claims at all DMERC processing centers on October 1, 2004. However, no DMERC except Health Now activated the capability. This CR requires the VMS help all DMERCs to activate the full PSC access capability and provide for certain other systems features identified since the initial implementation of the full PSC access capability,

#### **NEW/REVISED MATERIAL**

**EFFECTIVE DATE: April 1, 2006** 

**IMPLEMENTATION DATE: April 3, 2006** 

Disclaimer for manual changes only: The revision date and transmittal number apply only to red italicized material. Any other material was previously published and remains unchanged. However, if this revision contains a table of contents, you will receive the new/revised information only, and not the entire table of contents.

### II. CHANGES IN MANUAL INSTRUCTIONS: (N/A if manual is not updated)

R/N/D	CHAPTER / SECTION / SUBSECTION / TITLE
N/A	

#### III. FUNDING:

No additional funding will be provided by CMS; contractor activities are to be carried out within their FY 2006 operating budgets.

#### IV. ATTACHMENTS:

**One-Time Notification** 

\*Unless otherwise specified, the effective date is the date of service.

## **Attachment – One Time Notification**

Pub. 100-08 Transmittal: 126 Date: October 21, 2005 Change Request 3994

SUBJECT: Implementation of Program Safeguard Contractor (PSC) Access to the VIPS Medicare Shared System (VMS) at All Durable Medical Equipment Carriers (DMERCs)

### I. GENERAL INFORMATION

A. Background: The Medicare Integrity Program (MIP) provisions of the Health Insurance Portability and Accountability Act of 1996 allow CMS to contract with entities other than carriers and fiscal intermediaries (FI) to perform specific program safeguard functions. Under this authority, CMS has awarded contracts to 12 PSCs. The umbrella PSC SOW, under which CMS issues all PSC task orders, contains various workload reporting and systems requirements to which PSCs must adhere. These requirements involve the carrier and FI shared claims processing systems as well as systems such as the Common Working File, the Contractor Reporting of Operational and Workload Data System, and the Contractor Administrative Budget and Financial Management System.

To date, most of the PSC task orders CMS has awarded require the PSCs to perform very specific functions and have not included the full range of activities contained in the umbrella SOW. Recent task orders, however, have required the transition of major program safeguard workloads from existing Medicare contractors to PSCs. To accommodate these types of workload transitions and to prepare for implementation of a "full" PSC, CMS gave several PSCs the task to assess the systems modifications required to implement a fully integrated PSC and to prepare the necessary requirements documentation to accomplish this. Computer Sciences Corporation prepared the requirements documentation for the VMS contained in this PM.

**NOTE:** In accordance with the umbrella PSC SOW, current contractors are identified in this CR as Affiliated Contractors (ACs). Specifically, the SOW defines an AC as "A carrier, FI, or other contractor such as a DMERC, which shares some or all of the PSC's jurisdiction in which the affiliated contractor performs non-PSC Medicare functions such as claims processing or education."

As previously noted, CMS has and will phase in the modifications required to allow for full PSC implementation within the in VMS via several system releases. The most critical changes identified are related to "security" and "segregation of ownership."

The VMS modifications were developed and documented with the following overall assumptions:

- The PSC will access the shared system via the AC's production environment (the PSC may be co-located with the AC or in a remote facility)
- The PSC will work with a single AC for at least the initial implementation.
- The PSC will be defined as a separate department within the system.
- The PSC will test in the AC test environments during normal release testing windows and will follow established release testing guidelines.

- Any electronic transactions implemented by the PSC will follow ANSI standards (as required to support HIPAA legislation).
- The current VMS action code processing will sufficiently meet the PSC Denial Reason requirements.
- An internal PSC process will cover the Internal Quality Assurance requirements.
- DMERC appeals process for claims determination is the same as the Part B appeals process.

The VMS implemented the capability for a PSC to have full access to DMERC claims at all DMERC processing centers on October 1, 2004. However, no DMERC except Health Now activated the capability. This CR requires the VMS help all DMERCs to activate the full PSC access capability and provide certain other systems features identified since the initial implementation of the full PSC access capability,

**B. Policy:** CMS has established a specific series of contractor numbers for use by PSCs. Although CMS initially added these numbers for CMS internal reports only, CMS addressed PSC shared systems requirements in a separate CR.

The CMS implemented the "security" and "segregation of ownership" changes within the VMS in order to accommodate full PSC implementation. Section 1 of the "umbrella" PSC Statement of Work defines "a full PSC" as "…one that performs all of the fundamental activities contained in Section 3, General Requirements, under a Task Order."

The CMS addressed those requirements as they relate to the VMS and allowed PSCs to use the numbers to perform MIP activities within the VMS.

## II. BUSINESS REQUIREMENTS

-	Requirements	Responsibility ("X" indicates the								
Number		columns that apply)								
		F	R	C	D			Syste	m	Other
		I	H			Ma	intai	ainers		
			H	r r i e r	E R C	F I S S	M C S	V M S	C W F	
3994.1	VMS maintainer shall assist all DMERCs in activating the capability for PSCs to access the VMS system at each DMERC data center so that PSCs may have full access to DMERC claims processing data stored at the data center or an associated site by April 3, 2006.				X			X		
3994.2	The VMS maintainer shall modify the existing VMS to allow the differentiation between manual and automated development claims for both DMERCs and PSCs. The module shall be available in time for all DMERCs to begin operating the module by April 3, 2006.							X		

Requirement Number	Requirements	Responsibility ("X" indicates the columns that apply)								
		F I	R H H	C H a H r	D M E R	Shared System Maintainers  F M V C				Other
			1	i e r	C	I S S	C S	M S	W F	
3994.3	The VMS maintainer shall modify the existing VMS to allow the identification of when the owner of a correspondence case changes for both DMERCs and PSCs. The module shall be available in time for all DMERCs to begin operating the module by April 3, 2006.							X		
3994.4	The VMS maintainer shall modify the existing VMS to address the dirty vs. clean claim classification for both DMERCs and PSCs. The module shall be available in time for all DMERCs to begin operating the module by April 3, 2006.							X		
3994.5	By April 3, 2006, contractor data centers shall implement, operate, and maintain the shared system changes specified in requirements 3994.1-3994.4 and provided by shared system maintainers.				X					
3994.6	By April 3, 2006, contractors shall insure that their data centers have correctly implemented and are operating the changes developed by the shared system to meet requirements 3994.1-3994.4 of this CR.				X					

## III. PROVIDER EDUCATION

Requirement Number	Requirements	Responsibility ("X" indicates the columns that apply)							
N/A		F I	R H H I	C a r r i e r	D M E R C	Shared S Maintain F M I C S S S		C W F	Other

## IV. SUPPORTING INFORMATION AND POSSIBLE DESIGN CONSIDERATIONS

A. Other Instructions: N/A

X-Ref Requirement #	Instructions

B. Design Considerations: N/A

X-Ref Requirement #	Recommendation for Medicare System Requirements

C. Interfaces: N/A

Contractor Financial Reporting / Workload Impact: N/A

Ε. **Dependencies: N/A** 

**Testing Considerations: N/A** 

IV. SCHEDULE, CONTACTS, AND FUNDING

Effective Date\*: April 1, 2006 **Implementation Date: April 3, 2006** 

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**Medicare contractors shall** implement these instructions within their current operating budgets.

<sup>\*</sup>Unless otherwise specified, the effective date is the date of service.