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Submitting Your Medicare Part A Cost Report Electronically Webcast

Moderated by: Diane Maupai
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Operator: Hello and welcome to today's Medicare Learning Network® event. My name is Will and I will be your event specialist today. All lines have been placed on mute to prevent any background noise and please note that today's webcast is being recorded.

During the presentation, we'll have a question and answer session. You can ask text questions at any time. Click the green "Q&A" icon in the lower left-hand corner of your screen, type your question in the open area, and click "Submit".

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It is now my pleasure to turn today's program over to Diane Maupai. Ms. Maupai, the floor is yours.

Announcements & Introduction

Diane Maupai: Thank you, William. This is Diane Maupai from the Provider Communications Group at CMS and I'll be your moderator today. Welcome to this Medicare Learning Network webcast on Submitting Your Part A Cost Report Electronically.

Before we get started, there are a few items I'd like to cover. We're using webcast technology today. We recommend streaming the audio live through your computer speakers. If you're participating via webcast, you can download a copy of today's slide presentation by clicking the blue "Files" button at the bottom left of your screen. Please note that this event is being recorded and transcribed.

Today's event is not intended for the press and remarks are not considered on the record. If you're a member of the press, you may listen in, but please refrain from asking questions during the question and answer session. If you have inquiries, contact press@cms.hhs.gov.

I'll now turn the call over to Owen Osaghae from CMS.

Presentation

Owen Osaghae: Hi. Thank you, everyone, for being on the call today. My name is Owen Osaghae. I'm in the Division of Provider Audits Operations responsible for the Part A Cost Report. I just want to welcome everyone and let you know that we are continually enhancing the MCReF system.

And if you have any suggestions for us, at the end of the presentation, there will be a mailbox for questions and answers. You can send in your suggestions and we will consider that as part of the enhancement to the system.

And I'm going to hand over to Patrick who is going to be doing the presentation today. Thank you.

Patrick Herrity: Thanks, Owen. Good Afternoon, everyone. My name is Patrick Herrity and I'll be presenting the materials today. Please move on to slide 2. This is the list of acronyms that are used in the presentation. You can sort of use this for reference, if you're looking back at the slide deck on a future date to know exactly what acronyms we're talking about. But these will be used throughout the presentation. Please proceed to slide 3.

All right. So, for me, an overview today, we're going to be talking about introducing the Medicare Cost Report e-Filing System, also known as MCReF. Then, we'll also be communicating additional resources and information available regarding MCReF for the provider community to sort of make it a little easier to use the system, register, etc... Please proceed to slide 4.

For the agenda, we've already covered introductions. We'll, in a moment, we'll be giving a background and overview of the area of Medicare that MCReF sort of intersects with. We'll also do a walkthrough and detailed overview of the MCReF system.

And then, as I said on the previous slide, we'll have a discussion about ongoing outreach and education to the providers about MCReF. And then, we'll end today's meeting with an open question and answer session. Please proceed to slide 5.

Before we, essentially, before we get into actual discussion about MCReF, we wanted to give a quick business overview. And essentially, MCReF deals with e-filing of the Cost Report and, in particular, the Medicare Cost Report.

So just to give a quick background, the Medicare Cost Report is used to determine Part A providers' annual Medicare reimbursable cost. Providers use a variety of resources, including the Provider Statistical and Reimbursement System, PS&R, to create their Medicare Cost Report.

Approximately 50,000 Cost Reports are submitted each year that account for over $200 billion dollars' worth of Medicare reimbursement. From the provider perspective, they have a regulation. They have a regulation that specifies that they must submit an acceptable Cost Report to their MAC. And then Medicare Administrative Contractors, MACs, have requirements for receiving, accepting, reviewing, auditing and finalizing providers' Cost Reports for the year. Please proceed to slide 6.

Just to quickly go over sort of the historical model for the physical Cost Report submission and receipt through the mail or hand delivery, we want to talk about how providers typically submitted their Cost Report in the past before we talk about e-filing.

Typically, the provider puts together their Cost Report package, which includes some or all of the following that I'm going to cover: an electronic medium, computer-readable version of the Cost Report, so typically a custom text file; a human readable version of the Cost Report, which is typically a PDF format, sometimes referred to as the Print Image or the PI file; Interns and Residents data, which is the IRIS data.

And then, any other required supporting materials are also submitted in that Cost Report package. Lastly, the provider also submits their package of Worksheet S with an original inked signature by an officer of the provider's organization.

Historically, most Cost Reports are mailed, or hand delivered with a few being transmitted via MAC portal's websites. Once the – once the MAC receives the provider's Cost Report, they have 30 days to actually perform their acceptability review. Please proceed to slide 7.

So, to improve upon the existing, or the historical process for Cost Report submission, CMS set out a goal a few years back to standardize, automate and streamline the Cost Report processes for provider submission and then MAC receipt, acceptance and subsequent handling of that Cost Report submission.

And so, to achieve this, they established MCReF. Please – thank you. MCReF is a new application allowing Part A providers to electronically transmit or e-File their Cost Report package. The system has been available since May 1st of last year, 2018. Usage is entirely optional. Existing filing options for mail and hand delivery are still options that you can pursue, you know, as opposed to e-Filing.

The MCReF system itself is accessible to EIDM PS&R Security Officials, Backup Security Officials and those with the MCReF-approved Cost Report filer role. And then, once you've successfully e-Filed your Cost Report, your MAC will have access to your submission and all of the attached e-Filed Cost Report materials. Please proceed to slide 9.

There are many advantages of MCReF, but we've listed a few here for the provider's perspective. You'll see in a moment it's a single easy-to-use webpage. It defines one process for all providers via one submission portal. It's available to all Part A providers regardless of who your servicing MAC is. In particular, beneficial to chain organizations, which have providers at multiple MACs, and anytime your provider may change MACs due to a change of ownership or something else.

In general, MCReF reduces confusion, delays and time you spend on administrative processes relating to your Cost Report submission. And then, MCReF also provides immediate feedback on the receivability of your Cost Report submission. Please proceed to slide 10.

New MCR Submission Process

So next, we'll talk about the sort of new cost – the Medicare Cost Report submission process with the perspective of MCReF. We'll have a more detailed overview. We'll go into screenshots for how to log-in and view the system. And then, we'll go sort of field by field and describe all of the information in the system and highlight, what's going on behind the scenes. Please proceed to slide 11.

So just to give a quick detailed overview, the system is available. You can log-in to the system via https://mcref.cms.gov. And again, access is controlled by the Enterprise Identity Management System and it's restricted to those with the PS&R roles of Security Official, Backup Security Official, and MCReF-approved Cost Report filer. And that last role that I mentioned is a new role as of the time MCReF went live back in May of 2018.

Those with existing PS&R roles of Security Official and Backup Security Official will already have access to MCReF, so you can just log in via the URL above with your existing credentials and you'll have access to e-File your Cost Report for your providers. Any organization without access to PS&R must register a PS&R Security Official with EIDM before they can proceed with accessing MCReF.

One thing of particular importance is that you keep your EIDM account in good standing. This means password updates in a timely manner and then also the timely replacement of your Security Officials if they change roles or leave the company so that you don't have the gaps in being able to log in or have a Security Official for your organization.

Lastly, any sort of issues relating to logging in or your EIDM credentials, passwords expired, etc.., those are not valid reasons for filing your Cost Report late via MCReF. You can always fall back on the, on the historical option of mailing or hand delivering your Cost Report to your MAC.

And the last bullet here, we want to talk about CMS enhancement to EIDM. So, prior to September 10th of last year 2018, if you were an EIDM user and you tried to request, you requested a role with an organization, you could only have one open role requested at a time. And so, you couldn't request another role with an organization until that role was approved.

And so now, as of 9/10/2018, CMS has enhanced EIDM such that you can have multiple open role requests at the same time without that first one having to be approved before you could have that subsequent request. Please proceed to slide 12.

MCReF Walkthrough

So now, we'll jump in to what the – what the system actually looks like, how you log in and sort of going through the field of how e-File your Cost Reports. The first here is the system use notification, so when you access mcref.cms.gov in your – in your browser, this is the screen that you'll eventually be shown. Here you'll read through the terms and conditions and you'll click "I Accept". Please proceed to slide 13.

Once you've accepted, you'll be moved on to the CMS Enterprise Portal user ID screen. Here's where you'll be putting in your EIDM ID corresponding to the Security Official, Backup Security Official or MCReF-approved Cost Report filer role that you have access to or that you have permission. And then, you'll click "Next". Please proceed to slide 14.

Then, you'll be shown the CMS Enterprise Portal password screen. And so, then, you'll just put in your corresponding password and click "Log In". Please proceed to slide 15.

So then, you'll actually get to the MCReF screen and this is what it looks like. And essentially, this is the screen that you will deal with to actually e-File your Cost Report. So, the first thing you'll do – well, one thing worth mentioning first is, up in the top right-hand corner next to "Log Out", there's "Help".

If you have any particular questions while using this system, there is a user manual that you can go and check, and even particular errors will be referenced in there to see sort of how you should handle that scenario.

Going along, you'll select your provider number from the provider number drop down. And we'll get into more details about what each of these fields, how they're populated and that sort of information in a moment. Then, you'll select the Fiscal Year End for that provider from the Fiscal Year End drop down. Please proceed to slide 16.

You'll select the Medicare utilization for your Cost Report that you're e-Filing and you'll confirm the first Cost Report submission status there. And so, if this is your first Cost Report submission for the provider in Fiscal Year End, it will say "Yes". If not, then it will say "No" and that sort of will be a revised Cost Report that you're submitting. Please proceed to slide 17.

Next, you'll browse and look for the files that are required as Cost Report materials for part of your Cost Report package. What we're talking about earlier, putting together your Cost Report package, this is where you're going to upload all the files that are typically required of you when you submit your Cost Report package to your MAC.

And so, in this case, on the screen, the red asterisks, you kind of see it, it's small. It's next to the ECR, print image and signed certification rows; that means that those materials are required for the type of provider you are and the utilization that you picked.

That doesn't mean that that's all the things that are required. If you do have anything else that you typically submit that is required for your submission, you will need to submit those materials as well. And that will typically be submitted via a ZIP file or other archived compressed file type via the "Other" slot.

To actually select the file that you want to upload for a particular row, you simply click the "Browse" button, which is off to the right under the File Upload column for the row that you're trying to upload the file for. You'll browse either to the network drive or to some sort of folder in your – on your computer. You'll select that.

Once you've selected it, the path that you'll see in the file name is what you'll see to your computer or network drive and that sort of tells you that you have – you've browsed, and you've selected the file. It won't actually be uploaded until you click "Submit" and you've gotten a success message. But, in general, that will mean that you've browsed and selected your file.

Once you've done that, there's sort of an "I Acknowledge" statement at the bottom. You'll click that checkbox which will activate the "Submit" button. You'll want to read that acknowledgment statement because this essentially represents your official submission of your Medicare Cost Report to your MAC and to CMS. So, you definitely want to read that, check it, be sure before you do that and then click "Submit".

Now, the system does have certain validations to make sure that your Cost Report submission is sound. And so, in that case, it will display errors to you. And for the screen that we're looking at here on slide 18 actually demonstrates an error being received by the provider.

This means that your Cost Report was not received. You got an error. You will need to read the error and, as was mentioned the earlier, the user manual will actually has references to the specific error. And so, like, this is Error R1005. And, in this case, the Fiscal Year End which was identified in the system in the ECR is 12/26/2017, but the Fiscal Year End selected on the screen is 12/31/2017.

So, this is just an example of where you either need to regenerate that ECR with the appropriate Fiscal Year End, or maybe the system of record that the MAC maintains that holds the Fiscal Year End doesn't reflect the CHOW or some other change. And, in that case, that will have to be addressed to successfully submit your Cost Report.

Once you've done that, let's say it's just – you had to regenerate your ECR file or you selected the wrong ECR file, once you know where the right one is, you can just browse for the ECR file; find that on your computer or network drive; select that; and then, again, at the bottom, you'll want to make sure that that checkbox for acknowledgement of your Cost Report submission is checked. Then, you'll be able to click "Submit". And as long as no other validations are triggered, then you are presented with a success message. Please proceed to slide 19.

In general, once you had a successful submission, your Cost Report has been received with your MAC and the CMS. You'll be navigated to this confirmation screen. And you'll see a success message banner up at the top and you'll get a success message saying that your Cost Report was electronically postmarked with CMS.

And you can retain the information below either via a screen print or you can click on the printer-friendly version hyperlink there that will sort of have a pop up to a more printer-friendly version that you can print using, like, a standard Windows functionality for printing.

But you'll want to retain things such as the e-Filing ID, the electronic postmark date sort of as references to refer to you Cost Report later or to your MAC or to CMS. And it's also documentation that you did submit your Cost Report at the specific day and time. You'll notice that the e-Postmark date is in Eastern Time. We'll talk a little bit about that more momentarily. But no matter what coast you're on, it will show the Eastern Time.

Lastly – well, briefly before I move on to the log-out button, we'll also reference all of your selections made from the previous screen when you had submitted your e-Filing. So, the provider number selected, the Fiscal Year End, all of the materials, like what the actual filename was for each of the material slots that you selected for your Cost Report submission. And then, at the bottom, you can either, at this point, if you're just filing for one provider in Fiscal Year End, you'll click "Log Out".

Otherwise, if you have a bunch of providers that you're submitting like their 1231s or you're submitting their 1231 2018s, you'll just click "File Another Cost Report" and you'll be navigated back to that previous screen that we had seen, to actually do another Cost Report submission. You'll just pick a different provider, you know, Fiscal Year End and you'll continue throughout that process for that provider. Please proceed to slide 20.

Now, we'll jump into all of the details of the MCReF fields that we just sort of went over, first being the provider number dropdown. This contains all CMS Certification Numbers, CCN, that had been registered in EIDM which the provider's MAC also has on record in CMS' System for Tracking Audit and Reimbursement. And essentially, that system, also called STAR, is a system maintained by MACs.

The Fiscal Year End, that will contain the – all of the Fiscal Year End for the selected provider which have occurred in the past 6 years that are on or after 12/31/2017 as recorded by your provider's MAC in that STAR system. Next, the Medicare utilization--this allows providers to select the Medicare utilization level of the Cost Report being e-filed.

The options in that dropdown are full, low and no. The first Cost Report submission that was that static field that we saw that you would be confirming whether this is your first or last cost – or sorry, first – or if it's not your first Cost Report submission, as stated there, indicates whether or not the Cost Report that's already been recorded in STAR is received by the provider's MAC for the selected provider in Fiscal Year End.

And then, lastly, we talked a decent amount about the Cost Report materials table. But essentially, this is where you're going to upload all of your materials to submit a complete Cost Report package that your MAC should be evaluating for acceptance.

This may include dedicated slots for certain files such as the ECR, the print image, the signed certification page, IRIS data, a cover letter, and any additional files you would need to ZIP up into a ZIP file or some other archived compressed file format and submit via the "Other" slot, which we have seen on the screenshot previously.

Last thing, there is that note with the asterisk for which refers to the provider and Fiscal Year End fields referenced above. If, for some reason, you don't see a CCN in the provider number dropdown or don't see an applicable Fiscal Year End in the Fiscal Year End dropdown, first thing is to – you check the user manual. But pretty much it will give you the same instructions that we have here, which is confirm with your SO of your organization that they properly registered the CCN in question with EIDM and that you are registered to the organization with an EIDM role which grants you e-Filing privileges.

So that's sort of confirming that you have Security Official, Backup Security Official or MCReF Cost Report file approved like authorized access. And then, if all of that is confirmed but you still don't see something in the provider dropdown and the Fiscal Year End dropdown, we're asking in general that you contact your MAC at that point. Please proceed to slide 21.

Next, we'll talk about the Cost Report materials table and the different rows where you'll be submitting your Cost Report as part of your complete Cost Report package. The first one we talked about was the ECR.

In general, for the description of this, this is the Electronic Cost Report file, sometimes also known as the EC or the SN. And I won't go through all of them but depending on what provider or type of provider you are, you might have sort of a different acronym or a thing for that, so that's file type.

The system will require the ECR for all providers filing a full Medicare utilization Cost Report except for Home Offices and Limited Purpose Insurance Companies. The format of the system is expecting is a single file generated using a current version of CMS-certified ECR vendor software that is not a PDF, ZIP file or other archive file type. The max file size you can submit for this ECR row or slot is 1 MB.
Next is the print image. This is the human readable copy of the Cost Report, also known as the PI file. For Home Offices, the expectation is that you would use this print image slot for the 287-05 cost statement. That's what you would upload there.

The system requires the print image for all providers filing a full or low Medicare utilization Cost Report, except for those Limited Purpose Insurance Companies. The expected format is any human readable format generated using a current version of CMS-certified ECR vendor software that is not a ZIP file or other archive file type. And the file size limit for the print image is 10 MB.

Next is the signed certification page. This is where you'll submit the electronically signed Worksheet S Certification Page. And for Home Offices, again, the expectation is that you're submitting the 287-05 Schedule A with signature in the Signed Certification Page slot. The system will require this for all providers except for LPICs, the Limited Purpose Insurance Companies.

For format, this should be any human readable format including the encryption codes that are typically on the signed certification page generated using a current version of CMS-certified ECR vendor software that is not a ZIP file or archive file type. And the max size for this, similar to the print image, is also 10 MB. Please proceed to slide 22.

Next is IRIS, the Interns and Residents Information System files required for teaching hospitals, claiming GME and IME Full Time Equivalents on their Medicare Cost Report. This system doesn't currently require this but may do so in the future. The format expected, if you do submit IRIS, is an unencrypted ZIP file containing a single set of "M" for master and "A", assignment, DBF files. The current file size limit for this is 1 MB.

And then, next, Other. This is where you would upload any other files that are needed for you to submit a complete Cost Report package that don't otherwise have a dedicated slot. Examples that we have here is the working trial balance, bad debt listing, and sort of the list can go on.

But anything that you would be also required to submit to your MAC as part of their acceptability review you would want to make sure to get those into a ZIP file or some other archive compressed file type format. The max file size limit for this is 300 MB, including total attached file size, so that includes the total attached file size.

Next is the cover letter. This essentially is a document describing the nature of the submission or any other information about the submission which the provider wishes to communicate to the MAC upfront.

The system will require this for all revised Cost Report submissions, so essentially will require for anything that's not the first Cost Report submission. It must be a human readable format that is not a ZIP file or other archived file type. And then, the max file size allowed here is 10 MB. Please proceed to slide 23.

So, we have some additional information that we want to share about MCReF and the e-Filing submission. As we talked about earlier, there will be certain receivability validations to confirm that your Cost Report is fundamentally sound. We'll go over those on the next slide.

But if you do receive any error, your Cost Report will not be received by your MAC. You'll have to work and resolve that issue if you actually encounter an error. These errors, when you receive them, are not considered rejections and do not follow CMS' formal Cost Report rejection process.

So, your MAC won't be sending you a letter for these. You're getting the error in the screen and you'll have to address that to get a successful submission for your Cost Report to be received by your MAC.

If the submission passes all receivability validations, you'll be directed to the confirmation screen that we saw earlier. And that confirmation screen will display the success message that we talked about that your Cost Report

is received. It will also have your e-Postmark date in Eastern Time, your unique e-Filing ID, your transaction ID and all of the selections that you had just made upon submission.

Lastly, on that confirmation screen, if you desire to, that's where you'd want to save a copy of the screen's contents for your records just in case you ever need to reference them for the future. Please proceed to slide 24.

These are essentially the receivability criteria that we'll have when you click "Submit" for an e-Filed submission. So, your submission must abide by all of these rules essentially to be received and there's errors corresponding to most of these. But just to go through, all required Cost Report materials must be included, so the things that are required must be included. They must be in a valid format, probably what we went through on slides 21 and 22, and must abide by the size limits that we talked about on slides 21 and 22.

Attached files must conform to technical restrictions, must be virus and malware-free, have valid file names and the file contents themselves must not be blank or empty. The system in general will – or the system itself will only allow you to submit up to one revision per day for the Fiscal Year End and a revision can be submitted prior to acceptance or it can be used to submit an amended Cost Report submission after as-filed acceptance.

The one thing to note here is, if you submit your one revision for that day for that provider and Fiscal Year End, the system won't allow you to do another submission. But you do need, if you do want to do another submission, like, let's say you made a mistake and you want to do another submission that day for a revision, you can call your – you can contact your MAC via email or mail to ask them to reject your Cost Report.

And then, once they've done that, you'll be able to log back in and submit another revision. But you must email or mail, make a formal request to your MAC to reject it for that reason so that you can get that additional revision that day.

The FYE, moving on to the next bullet for receivability checks, the FYE must be within the past 6 years and must be on or after 12/31/2017. This isn't a particular validation that you're going to ever see, but the dropdown itself will only show Fiscal Year Ends that abide by that rule.

The – moving on to the next rule, the provider Fiscal Year Begins in Fiscal Year End must exist in STAR that's MACs maintained system, and it must match the ECR file if that file was required and provided.

Next, the provider Fiscal Year End specified must not be locked. An example of being locked in STAR is if you're administratively closed. For that Fiscal Year End, the provider must not be a subunit and does not – or must not already have a finalized NPR present in STAR for that year.

And then, lastly, anything subunits and consolidated FQHC/RHC units that are listed in the ECR file must match those within STAR for the family when filing a Full Medicare Utilization Cost Report. So those are all the receivability checks when you click "Submit". Please proceed to slide 25.

The next few slides will cover some additional information. We went over the receivability checks which are errors, which means your Cost Report is not received. There are also a few warnings and so they are listed here.

If you're filing your Cost Report after your due date and you don't receive any other, like, validations, you'll receive a warning basically just informing you that you're filing your Cost Report late and confirming that that is intentional.

Also, if you try to upload an ECR that was generated with outdated ECR vendor software, that will generate a warning as well. Warnings, you can click "Yes" and confirm, and your submission will still go through as long as no errors occur. But otherwise, like, sometimes you may need to read the warning and consider if you need to do anything based on that warning.

As we talked about, timely receipt of the Cost Report will be measured based on the – based on submitting your Cost Report by 11:59pm Eastern Time on your actual Cost Report due date. So, if you submit at midnight for the next day after your Cost Report, you are late. You need to submit by 11:59pm Eastern Time on your Cost Report due – or by your Cost Report due date.

Files uploaded are not to be encrypted or password protected. MCReF itself is a secure portal for the transmission of the Cost Report materials that you're submitting, and this includes PII and PHI.

The next bullet, duplicate submissions will be rejected by your MAC, at which only the first Cost Report that your MAC receives will be processed. Anything that's deemed a duplicate and is received after will basically be considered rejected or an erroneous submission.

And that sort of leads into that next bullet which is the first Cost Report received by your MAC either via MCReF or mail/hand delivery will be treated as the provider's first Cost Report submission for the year.

And so, the particular example we have, which is kind of an odd case but just want to make everybody aware of is that, if you submitted your Cost Report prior to your Cost Report due date – let's say you submitted the day before – and then, you logged in to MCReF after your due date, your Cost Report due date, and decided that you wanted to submit another Cost Report.

But before, the one that you had mailed in had been acknowledged and received by your MAC and recorded in STAR. If you do that, the system will indicate that that is your first Cost Report submission.

When you click "Submit", it will warn you that you're filing late. And because that submission will actually be received by your MAC before the mailed-in submission, your Cost Report will be considered late for the year. So that's sort of a tricky situation, but that's something to be wary of when you're logging to the system is, did I already mail this in, as something to just think about. Please proceed to slide 26.

Some additional details. Effective January 2nd of 2019 of this year, there is only 2 CMS-approved methods of Cost Report submission going forward, that is electronic submission or e-Filing via MCReF and physical submission via mail or hand delivery.

All Cost Reports for Fiscal Year End on or after 12/31/2017 can be e-Filed via MCReF with a few exceptions that may need to be mailed or hand delivered. And so, an example of that is anything that would satisfy CMS's existing acceptability criteria, but for some reason does not pass MCReF's receivability checks that we went over previously. Those would need to be mailed or hand delivered.

And so, an example of this is, let's say you have tons of required materials that you have to submit that don't have dedicated slots. Those things would need to be submitted via the "Other" slot, which has a current limitation – file size limitation of 300 MB. If, for some reason, you're required to submit over 300 MB, then you would need to do that via the mail. You wouldn't be able to use MCReF as it stands today.

And then, the last bullet there is just that, if there is any issues with the system that prevents you from using it, that doesn't grant you an extension for your Cost Report. It would still be considered late if, for some reason, your e-File – or you're trying to file late because of system issues, you can always drop your Cost Report in the mail as historically has been done if you encounter any issues with the system or your EIDM credentials or anything else. Please proceed to slide 27.

Next, we want to talk a little bit about e-signature or electronic signature. In August of 2017, CMS issued the 2018 IPPS final rule which authorizes providers to file their Cost Report with an electronic signature effective for Fiscal Year End on or after 12/31/2017.

One thing that had caused some confusion that we want to make sure is clear is that that IPPS final rule didn't change who's authorized to sign the Cost Report, that Worksheet S Signed Certification Page.

And then, in conjunction with that IPPS final rule, CMS released new transmittals for Cost Report forms which support e-signature and that's for the majority of Cost Report forms are e-signature capable at this time. We'll go through some exceptions, but that is the case right now.

An approved form of e-signature per that 2018 IPPS final rule is required for signing and subsequently uploading that document to the Signed Certification Page slot in MCReF. And then, the next bullet here is additional information for if you're filing on a Cost Report form that doesn't currently support e-signature. This only affects 3 versions.

And so, if you're filing via MCReF using MCR forms 222-92, which is the old RHC form; 2088-92, which is the old CMHC form; or the 287-05, which is the current Home Office Cost Report form; these do not currently support e-signature – or do not support e-signature. And, in this case, you must follow this process.

You need to upload a scanned copy of the Certification Page via the Signed Certification Page slot. Additionally, you'll need to mail, and hand deliver a – or hand deliver a copy with a signature signed in ink to your MAC such that it's received within 10 days of your MCReF submission. But you only need to do those if you're submitting on the 222-92, the 2088-92 or the 287-05. Please proceed to slide 28.

So, to kind of even – make it even more clear, this table essentially contains all the current Cost Report versions for the various provider types. And then, it currently has, you know, a "Yes" if that version is e-signature capable or a "No" in which you need to follow that other process of submitting the hard copy in the mail.

And you'll see here, and you can refer to when your time comes around to e-Filing, you can refer to this to say, "Okay, my version looks like an e-signature capable, so I don't need to follow that other process."

Or if you're filing on a 222-92, 2088-92 or 287-05, you would need to follow that other process of submitting the Signed Certification Page via MCReF, but then also sending in the hard copy such that it's received by your MAC within 10 days of the MCReF submission. Please proceed to slide 29.

Continuing along to discussing electronic signature, the next few slides will go through a few – a few examples of valid and invalid uses of e-signature. This is not like the exhausted list of all valid ways that you can e-sign or invalid ways you can e-sign.

But, in general, we wanted to cover these because these are probably mostly cases that providers have had some confusion with. And so, if you want specific guidance, you'll want to refer to the 2018 IPPS final rule for guidance on exactly how-to e-sign, but we'll go through a few examples now. Please proceed to slide 30.

In this case 2552-10 Worksheet S or Signed Certification Page. In this case, this is a valid use of the e-signature. You'll notice at the bottom they've checked the e-signature checkbox which says that my electronic signature is essentially the same as my web signature.

And then, they've typed Andrew Smith Michaelson as the, you know, authorized person to sign for the Cost Report. And they've uploaded that document to MCReF via the Signed Certification Page row. So, this is a valid use case. Check the e-signature checkbox. It may have a valid first and last name on the signature line. Please proceed to slide 31.

Another valid use of e-signature is to print the Signed Certification Page or Worksheet S. And in this case, for the person that is signing this page, they would actually check by hand the e-signature checkbox and then sign their signature by hand. And then, they would upload or scan that – sorry, scan that document and then upload it via MCReF.

This is also a valid use of e-signature. They've checked the e-signature checkbox and they've also signed their name and then scanned it and uploaded it into the signed certification page slot. Please proceed to slide 32.

The next 2 are invalid uses of e-signature and could result or would probably result in the rejection of your Cost Report. In this case, the e-signature checkbox is not checked. Another thing that's caused some confusion is that sometimes the check won't be actually within the checkbox. And so, that's something you'll want to make sure that you're checking within that checkbox to verify that your electronic signature is equivalent to your wet signature. So, this is an invalid use of e-signature. Please proceed to slide 33.

This is another example of an invalid use of e-signature. In this case, the provider or the person authorized to sign the Worksheet S has checked the e-signature checkbox, but has put X123 on the signature line, which is not a valid first, last name.

In general, you want to have – you should be signing with your first and last name or your full name. And so, in this case, this would be an invalid use of e-signature. And so, again, these 4 examples aren't the exhaustive list. You'll want to refer to that 2018 IPPS final rule for additional guidance. Please proceed to slide 34.

MCReF Provider User Experience

Next, we want to talk a little bit about the MCReF provider user experience that we've had so far. So please proceed to slide 35.

The first thing is covered – we're covering MCReF provider testing. This actually happened before the system went live back in May of last year. And so, 6 provider organizations which represented approximately 150 Part A providers volunteered to test MCReF and provide their feedback to CMS.

Participants at the end were asked on a scale of 1 to 10 how likely they were to use MCReF and the average rating from that was 9.7 out of 10. Some of the feedback we received was that it was very easy to use and to understand. The system was quick to show errors and intended results and that one of the providers had had an excellent experience and was very excited and anxious for the system to go live. Please proceed to slide 36.

Next, we'll cover some of the usage stats that we've seen from MCReF since the system went live in May and some of the recent stats that we've been seeing and trends. Over – since May 1st of 2018, over 6,250 successful submissions have been made via MCReF from over 1,400 distinct users.

Once they've uploaded all their materials or selected all the materials to be uploaded and made all their selections on the submission screen and clicked "Submit", it took the system only 3.4 seconds as the median submission time to actually get a result back to the user. So super-fast once you click "Submit".

And then, over 700 providers since 5/1/2018 were able to correct errors for their Cost Report prior to the submission and without the need of correspondence with their MAC to resolve the issue and potentially avoiding the rejection of their Cost Report if they would have mailed it in or hand delivered it to their MAC.

And then, the trend we've been seeing from the last 3 months of MCReF usage is that a third of Cost Report submissions were e-Filed via MCReF across all provider types. And then, half of all hospital Cost Report submissions have been submitted via MCReF over the last three months as opposed to via mail or hand delivery. Please proceed to slide 27.

Ongoing Outreach and Education

Lastly, we're going to talk about ongoing outreach and education. Please proceed to slide 38.

CMS did issue change request 10611 which was issued back in April – back on April 30th of 2018, if you want to reference that for some of the guidance that has been given to providers for using MCReF.

There was also MLN Matters article which the URL there is posted in case you want to go view that. We've had three webinars, including today's. There is a CMS-dedicated website to MCReF, which includes – we have the URL there that you can reference afterwards – but it includes links to how to request your EIDM user roles for that Security Official, Backup Security Official so you can use MCReF.

It has the MCReF user manual. It has the reference to the MLN article we referenced above and then frequently asked questions. And then, lastly, CMS is working on documentation updates for the 100-06, the Provider

Reimbursement Manual 15-1 and 15-2. And then, as we stated in previous slides, are continuing to update Cost Report transmittals to support e-signature. Please proceed to slide 39.

So that covers all the materials we wanted to go over for the presentation portion. We'll move on to the question and answer session. And then, I think we want to show slide 40 as additional resources that you can reference if you have any questions about using MCReF or, if you have issues with logging in to EIDM, those are some reference places that you can, you know, log any questions or if you have any issues logging into MCReF.

Question & Answer Session

Diane Maupai: Thank you, Patrick. We're now going to take your questions. Throughout the Q&A session, we'll ask you questions about MCReF via the webcast. Disable your pop-up blockers for the best results.

We'll begin our session by answering a few questions that we've received from webcast participants and we'll take – then take questions from the phone. Dorothy, please prompt the telephone users and begin to compile the Q&A roster.

Operator: To ask a question, press star, followed by the number one on your touch-tone phone. To remove yourself from the queue, press the pound key. Remember to pick up your handset before asking your question to assure clarity.

Once your line is open, state your name and organization. Please note your line will remain open during the time you are asking your question, so anything you say, or any background noise will be heard in the conference. If you have more than one question, press star one to get back into the queue and we will address additional questions as time permits. Please hold while we compile the Q&A roster.

Diane Maupai: Okay. And while you compile the roster, we'll start taking questions from the webcast. So, the first question is, can I use Google Chrome – Google Chrome web browser instead of Microsoft Explorer to submit my Medicare Cost Report through MCReF?

Geoff Kuhn: This is Geoff Kuhn with the Maintenance Team for the system. Right now, the system is sort of targeted for Internet Explorer and will definitely work with Internet Explorer. Generally, other browsers like Google Chrome will work just fine. They haven't been as thoroughly tested, but we are sort of web standard compliant and it will work.

The only exception to that is Firefox which has a specific compatibility issue with MCReF. And if you're in Firefox, the website will let you know that there may be an issue. But any other browser that you use, including Chrome, should work fine.

Diane Maupai: All right. Thank you, Geoff. Our next question is, is there a certification or CMS validation that MCReF is HIPAA compliant since PHI, that is bad debt listing of patients may be included in the submission of the Cost Report?

Owen Osaghae: Hi. This is Owen Osaghae with CMS. MCReF is a CMS system and it is – you – it is a secured system that you can submit any information that has a PHI, PII or any document you have such as the IRIS.

Diane Maupai: Right. Well, thank you. Our next question is, last year, when I tried to submit supporting documentation under "Other", it all had to be in one file. Is only one file allowed to be uploaded under "Other"?

Geoff Kuhn: This is Geoff with the System Team again. For "Other", there's a requirement that it'd be a single ZIP file. It's a single upload slot, so you have to put one file in it, but that file can be something like a ZIP archive which contains many other files. So before uploading your various documentation, you need to place them in archive like a ZIP and then upload that ZIP altogether.

Diane Maupai: Thank you, Geoff. When I log in to MCReF I do not see the same screen as you. I see my portal. Does this mean I have not been given access to a facility to submit their Cost Report?

Geoff Kuhn: Without being sure what is meant by the portal, at log in, if you are being directed to the EIDM maintenance sort of website where you'd manage your user ID, password and profile, that sort of portal; that generally means that you may not going directly to the MCReF URL that was listed earlier in the slide.

If you save a favorite while you're on the log-in page, instead of after you reach the system, that over time will stop working and can cause the behavior that's being described. So, a general reminder for everybody that you definitely want to use the MCReF URL itself if you're going to save a favorite. Don't save a favorite after you're sitting on the log-in screen because that's actually a different website system that handles the log-in.

Other than that, other common issues at log in if you are not seeing the providers and the pick list and so forth may be that the provider you are registered for is not yet set up on the other side.

So, if it's a really new provider and the MAC has not been notified about it by the CMS regional office, it may not available yet. Or the Security Official of your provider may have, like, not set up their profile correctly and may not have the correct CMS Certification Number registered.

So, check your link. Talk to the Security Official to make sure that they have the appropriate identification information for their organization. And then, if it's brand new, maybe just give it a while or contact the MAC. Any of those might be related to why, when you log in, you don't get directly to the page you expect to see.

Diane Maupai: Thank you, Geoff. Dorothy let's take a question from the phone.

Operator: Your first question comes from the line of Mike Lefevre.

Mike Lefevre: Hi. This is Mike Lefevre with Gundersen Health System. I had a couple of questions. I guess I'll just take one of them here because that's all I'm limited to.

On slide 24 it said you can put in one revision per day of MCReF. But then, later in the presentation you said once you've filed, any subsequent filings would be rejected. I'm just confused why you would be able to put in a revision if any subsequent would be rejected.

Geoff Kuhn: This is Geoff. I'm not sure what slide you're referring to that specifies that any subsequent will be reject. In general, if you submit duplicates, the exact same Cost Report submission multiple times, those

subsequent duplicates will be rejected. They'll take the first original one. But if you are submitting changes, you are correcting or modifying and submitting a legitimately different submission, those will be evaluated like any other Cost Report revision would be evaluated.

Mike Lefevre: Okay. How can MCReF tell whether it's a new – or changes were made or not?

Geoff Kuhn: In this case, MCReF is not the one that's going to make the determination of the duplication.

Mike Lefevre: Okay.

Geoff Kuhn: It's more just informing you that if you submit the same thing multiple times what to expect will occur on the other end.

Mike Lefevre: Okay. Thank you.

Diane Maupai: Okay. Thank you. We'll, now, our next question comes from a webcast participant. If all documents are uploaded to MCReF successfully, except for the "Other" ZIP file, would Cost Report submission be deemed acceptable if we mailed in a separate ZIP file with "Other" files rather than including the "Other" ZIP file through MCReF?

Geoff Kuhn: This is Geoff. The general rule is that everything needed to determine acceptability, everything that's the required packaged for acceptance needs to come through MCReF together. If you're submitting other documentation in support of other activities or other requests that the MAC may make of you, those do not have to come in as part of that one submission.

But if it is needed for the acceptability check, if it's part of the checklist that CMS has put out saying this is how your Cost Report – like everything required for a Cost Report, that must come through MCReF.

Diane Maupai: Thank you, Geoff. We'll now take a question from the phone.

Operator: Your next question comes from the line of Constantine Gorelick.

Constantine Gorelick: Hello. My name is Constantine. I actually work with a vendor called eClinicalWorks. And I'm trying to help health centers submit these reports and I was wondering where the updated 2019 specifications are of these files.

Matthew Canniere: Which file?

Constantine Gorelick: The Medicare Advantage file.

Diane Maupai: Please give us a minute. We'll be right back.

Constantine Gorelick: Sure. Thank you.

Matthew Canniere: Hello. This is Matt from the Management Team. We don't understand what files you're talking about when you say Medicare Advantage files. We're in Part A right now, so I'm just curious what Advantage files you're talking about.

Constantine Gorelick: No. That's actually what I meant. Sorry, I misspoke.

Matthew Canniere: So, can you ask your question again.

Constantine Gorelick: So, I was wondering where the specifications are for the information that need to be included for your Medicare Part A files.

Matthew Canniere: I think if you have an email – we don't fully understand your question, to be honest.

Owen Osaghae: Are you asking information you need to submit with your Cost Report file – your Medicare Cost Reports?

Constantine Gorelick: Yes.

Owen Osaghae: Those are part of the Cost Report instructions for filling out a Cost Report. Usually the Cost Report instruction tells you that you need to file your ECR file, your PI file and any supporting documentation such as bad debt or your working trial balance. Those are the Cost Report instruction that you normally will submit— that we allow with your Cost Reports.

Diane Maupai: I hope that answers your question, Constantine. But if not, on slide 40 you'll find a list of contacts and you can email in your question for more back and forth.

Constantine Gorelick: Okay. Yes. Perfect. Thank you.

Diane Maupai: Okay. Thank you. Okay, our next question comes from the web. I have – I have a PS&R user role. Do we have to add MCReF user role on EIDM? Is it automatic or can only PS&R Security Officials– Officers submit the MCR?

Geoff Kuhn: This is Geoff. The PS&R user role does not automatically grant access to MCReF. If you have a PS&R user role and you want access to MCReF, there is the MCReF-authorized Cost Report filer role which you can add to your profile the same way you added your PS&R user role.

The Security Officials sort of automatically inherit the ability to do MCReF and to do PS&R. For anyone who's not a Security Official, they need to delegate that access via these separate roles. So, yes, you can, but you will need to have the additional role added.

Owen Osaghae: They can delegate to more than one person.

Geoff Kuhn: And there is no restriction on how many people they can delegate to. It's not just one person. If there are multiple who they wish to delegate, the Security Official can approve multiple people for each aspect.

Diane Maupai: Thanks, Geoff. We'll now take a question from the phone line.

Operator: Your next question comes from the line of Chike Ogboeny.

Chike Ogboeny: Hi. My name is Chike Ogboeny. I just want to ask, is the presentation available online afterwards for further review?

Diane Maupai: I'm sorry, yes. The – it is on the lower left of the screen. Let me – if – I believe if you – if you look right below the screen, it is showing the slides where it says "Slide MCReF Overview". I think maybe you can find it there. William, if I don't have that right, can you please pipe up?

Okay. And also – well, actually, if you go to MLN Calls, if you Google that, you will see a list of our calls and look by date. And when you look at today's date, you'll see the MCReF call and, on that page, you will find a presentation. And in a few weeks, you'll also find the transcript and the audio recording of this call.

Chike Ogboeny: Wonderful. Thank you so much.

Diane Maupai: Okay. Thank you. Okay. Our next question is, since the MAC has 30 days to perform the acceptability review, can we assume that after the 30 days for submission we can breathe easy, not that issues were – that no issues were raised?

Owen Osaghae: This is Owen with CMS. Once a Cost Report is accepted, the MAC will need to send you a letter informing you that your Cost Report was accepted because MACs have 30 days from the date of receipt which means you can file through MCReF from the day you file it through MCReF. They have 30 days to determine acceptability. Once that is done and you have a confirmation, or if it's past that day, you know that it was accepted.

Diane Maupai: Okay. Thank you. Thank you, Owen. We'll take question from the phone.
Operator: Your next question comes from the line of Felipe Garza.

Felipe Garza: Hi. Good afternoon. I just had a question on the e-File on page 19, if the files needed to be named on a certain manner to upload them.

Geoff Kuhn: No. This is Geoff with the Maintenance Team. There's no general restrictions on the naming of the files. They need to be valid filenames. There are certain ones that have restrictions, I think, like the IRIS file has some certain guidance that must be for a valid IRIS file.

But mostly when we stated on other slides, then it must like be a valid filename. It can't have certain characters. There are certain characters in a filename that would be a restriction or if you managed to name a file a 500-character long file name, then there would be an issue with that where thought it was coming in.

But generally, other than that, there's no real restrictions or guidance on what the file must be named. That being said, there is guidance from the Cost Reporting side as to the proper way to name an ECR file. And so – and generally, you should still be following that guidance and naming your ECR file when you upload it and things in that nature. But MCReF is not enforcing those rules.

Felipe Garza: Okay. So, when you upload, it's not going to reject it and say, this is an incorrect like – because I see, like with that extension, the .17A and normally that's like the one that the software automatically saves, and you'll just change the other.

Geoff Kuhn: Exactly. The filename that your Cost Report vendor software produces should be just fine.

Felipe Garza: Okay.

Diane Maupai: Okay. Thank you. Our next question from the webcast, since the MAC has 30 days to perform the acceptability review…

Owen Osaghae: We just did that.

Diane Maupai: Sorry, about that. Let's see, I'll take one from the phone.

Operator: Your next question comes from the line of Sai.

Sai: Hi. This is Sai. I'm from Noridian and I just want to double check that the audio recording of today's presentation will also be available on the MLN website or do we have to request it?

Diane Maupai: No. Both the transcript – written transcript and the audio will be posted on the webpage I just told you about.

Sai: Okay. Thank you.

Diane Maupai: You're welcome. It is often difficult to determine who to contact at our MAC. Do you have a contact email for each MAC that we can contact regarding MCReF issues?
We do not have a listing of the emails of all the MACs. On page 40, you'll find a list – you'll find an email for general questions. What I've found is, if you go to the MAC website and search on Cost Reports, hopefully, you can find a contact there, I think. Okay. So, our next question is for the other documentation.

Owen Osaghae: The one before for the consultants.

Diane Maupai: From the data. For the other documentation, how do you – I'm a consultant.

Owen Osaghae: Yes, that one.

Diane Maupai: This one. I'm a consultant that prepares over 90 reports for various clients. I think I can register as an MCReF-approved Cost Report filer, but I'm not sure of the process. When trying to register, I'm asked to choose my application, not seeing approved Cost Report filer as a choice.

How do I register? Does this allow me to download PS&R reports for providers? If not, is there an application that would allow me to access that information? Obviously, the clients will have to give me access to do that.

Geoff Kuhn: This is Geoff with the Application Team. Within EIDM, when you're selecting applications, it's labeled the PS&R/STAR application. Within that there are different roles. One of the roles is for PS&R end user access. There is another one for the MCReF-approved Cost Report filer. So, if you want access to PS&R, you would choose from the PS&R STAR application for the security – like for the organization you want to associate to and request a PS&R role. And then, if you also need the ability to submit Cost Reports on their behalf, you would get the MCReF-authorized Cost Report filer role. So, neither one grants access to the other. But the access to both is requested in the same place, both under the PS&R/STAR application.

Geoff Kuhn: And then, referring back to slide 38, there is a CMS website with guidance on the process for requesting roles along with other FAQs. So definitely refer to that resource if you are trying to request and having issues finding the information you need.

Diane Maupai: Okay. Thank you. For the other documentation, how do you put in more than one file in this category? Also, why can't we submit the amounts above 300 megabytes in the second filing with just that information? We are being asked to submit huge amount of data beginning this – next year.

Geoff Kuhn: This is Geoff with the Application Team. The general rule is that for one submission, everything needs to come together. And so, there's no functionality currently in there to do multiple small submissions and link those together.

If you have more than what can be sent in through MCReF, the general recommendation is to either submit your entire package outside of MCReF as an exception to the rule or, if there's things you're filing that are not required for the Cost Report, file what's required from the Cost Report through MCReF and then submit your other documentation to the MAC through whatever their preferred means would be.

In terms of the 300-megabyte limit, that's a performance consideration and the way that the system is currently set up and it was set to be – something that would handle the 99% case. If we see continued demand for significantly larger files than that, that can be an ongoing consideration that CMS looks into to accommodate.

So, if you do run into that scenario frequently, reach out to your MAC, reach out to CMS and advocate for expanding that capacity. And in terms of the – I think the very first part of the question for doing multiple files, it will always just be the one ZIP file uploaded to that slot.

Diane Maupai: Thank you. If MCR is e-signature capable, is it required to be e-signed or is that optional? So, we'll be right back.

Geoff Kuhn: If the e-signature – or sorry, if the Cost Report form, you're using is capable of e-signature, the requirement is that you use the e-signature for filing through MCReF. If you aren't filing through MCReF and you're sending it in through the mail or through FedEx, you don't have to e-sign that Cost Report back and just be a plain wet signature. But if you're going through MCReF and your Cost Report supports it, you must e-sign it for it to be a valid MCReF submission.

Diane Maupai: Well, thanks, Geoff. In the case of Home Office 287-05, how can the certification page be uploaded? Is the Home Office provider number listed in the EIDM system?

Geoff Kuhn: For the Home Office provider number, if the Security Official of the organization has registered the Home Office ID in EIDM, then the Home Office number would be available in MCReF for that organization. So, it's on the provider to make sure that they've registered it and if they've done that, then it is available for use in MCReF.

Owen Osaghae: The signature page.

Diane Maupai: Okay.

Owen Osaghae: This is Owen Osaghae. For the signature page, since the Home Office cost statement is not e-signature capable, you can sign, scan it and upload the signature page into MCReF. But if you do that, you have to mail the wet signature page to your MAC within 10 days of your submission through MCReF.

Diane Maupai: Okay. Thank you, Owen. Here's our next question, to clarify, if you submit your Cost Report electronically before the due date and the next day, still before the due date, you realize you made an error and need to resubmit, would this duplicate submission be rejected and the original will still stand as your submission? Any day after you submit your Cost Report that is still before the due date you need to contact your MAC to reject your initial submission, correct?

Geoff Kuhn: This is Geoff. The – we touched on this a second ago, but when we say duplicate, we really mean sending in the exact same submission. In the scenario described, if you realize you've made an error and you're resubmitting, you're revising the original submission to correct something you did wrong, that is not a duplicate and that will not be automatically rejected.

That would be just like sending in other – any other revised submission to your MAC through the mail or otherwise. You may want to – you definitely want to include in your cover letter why you're submitting again and what's different about this time, so the MAC doesn't mistake your submission for a duplicate.

But other than that, there's nothing that the system is going to do to block that submission and you don't need to, let's say, contact and then warn them that it's coming in. You may want to, but that's not a requirement. The system will let it come in and the MAC will evaluate it based on the content of the submission.

Diane Maupai: Okay. Thank you. Does the person signing the 2552-10 form have to log in or can any authorized user upload the form?

Geoff Kuhn: As long as the individual is authorized for submitting in MCReF, they don't have to be the person who actually signs the document. So those can be separate individuals.

Diane Maupai: Thank you. Can the box on the signature page be checked by hand and then a hand signature or does the box have to be checked electronically within the Cost Report software?

Geoff Kuhn: At the end of the day, the box has to be checked on the version of the documents that the MAC receives, so that can either be by hand and then scanned, so it's – the scanned version has a checked box and a signature on it, or it can be done in the vendor software beforehand. Either one is equally valid. But the box has to be checked.

Diane Maupai: Great. Can you add file upload lines for multiple "Other" files?

Geoff Kuhn: Under the current set up, there's the one slot that accepts any number of files via the ZIP file attachment. That's the way that the system is currently architected and based on ongoing feedback, there may be a decision to alter that. So, if you want to advocate it being a different way, I'd discuss that with your MAC or submit to CMS. But as of right now, there's no plan to just add an arbitrary number of "Other" slots.

Diane Maupai: Okay. Thank you. In the case of a consolidated Cost Report for FQHC, do all PTAN have to be listed in the MCReF? Do you reference to FQHC using the primary PTAN number?

Geoff Kuhn: For filing a consolidated FQHC Cost Report, the primary FQHC is the one who definitely need to be registered in the EIDM. That's the one you need to be associated to get into MCReF as that's the primary number on the Cost Report that's being uploaded. The other FQHCs may want to be registered for better access to PS&R data, but there's no requirement for them to also be set up for MCReF in order for the consolidated Cost Report to go through.

Diane Maupai: Okay. Thank you. The person who submitted the Cost Report last year is no longer with the company. Do I need to deactivate that person before I sign up?

Geoff Kuhn: As a general best security practice, you should definitely deactivate people that are no longer with your organization, so they no longer have access to the CMS system. There is no restriction that prevents you from signing up an additional user before you do so.

Diane Maupai: Thank you. Can you use Google Suite products instead of Microsoft? Google Sheets instead of Microsoft Excel?

Geoff Kuhn: There aren't any current formats that MCReF is checking for that are specific to a – like a Microsoft XLS format. As long as you can export the file and get it into the "Other" disc and upload it, then it's sort of between you and the MAC being able to read the file that you sent them. If you submit a format they can't read, they may have issues with that. But there's no restriction on the MCReF side saying it must be a Microsoft product.

Diane Maupai: Thank you. Can a consultant be designated as an MCReF-approved Cost Report filer? If so, can they have one user ID to log in for several different clients or will they have a separate login for each client?

Geoff Kuhn: The nature of EIDM is that an account is tied to an individual. So, any one person can only have one EIDM account. And then that account is registered to different organizations and granted authority by those different organizations for what they're able to do.

So, as a consultant, if you're working with multiple providers, you will have one ID and one password, and you will register with each of your different organizations under that account and be granted access. When you log into MCReF, for every organization that has granted you the MCReF Cost Report filer role, you'll see them in your dropdown as valid entities that you're allowed to file for.

Diane Maupai: Thank you. Can we have both PS&R user roles and MCReF filer roles?

Geoff Kuhn: Yes. You can have both of those roles independently; one, the other or both. There is no restriction or tied together of those two things.

Diane Maupai: Thank you. Can anyone submit the Cost Report other than the authorized signer for the Cost Report?

Geoff Kuhn: The core requirement for submission is having authorized access in MCReF. So, if you've been given the MCReF Cost Report filer role or you are the Security Official of the organization, you can submit the Cost Report within MCReF.

Neither of those cases must be the person who actually signed the Cost Report, but it also is allowed to be the person who signed the Cost Report. So, there's no requirement that it'd be the same, as long as that individual has been authorized for that role by their organization.

Diane Maupai: Thank you. Someone asked earlier if – somebody asked earlier if MCReF was HIPAA compliant? The answer seemed vague and I didn't – and didn't convey either yes or no.

Owen Osaghae: Yes. It's HIPAA compliant. It's a CMS system.

Matthew Canniere: This is Matt from the Application Team. It also notes that on the page itself on your it says that it's a secure portal for filing PII/PHI. And it's also in the user manual if you're looking for any documentation on that.

But between Owen saying CMS today as yes, it is HIPAA compliant plus the onscreen alerts and the user manual documentation, hopefully, that'll be enough to make you feel safe doing it. But it's very much a secure portal for filing PII/PHI.

Diane Maupai: Thank you, Matthew. If a provider uses a CPA firm to prepare its Cost Reports, can individual at the CPA firm be set up as a user to submit Cost Reports in MCReF?

Geoff Kuhn: This is Geoff. As long as that user registers in the EIDM and is approved as an MCReF Cost Report filer with an EIDM, they are authorized to submit these Cost Reports.

Diane Maupai: Thank you. Are there any limitations on the type of ZIP software used?

Geoff Kuhn: Generally, no. 7-ZIP, gZIP, WinZIP as long as you're not encrypting the ZIP file that you attached, you should be good to go.

Diane Maupai: For the – for new user registration, which application I need to pick for – to register for MCReF?

Geoff Kuhn: This is definitely a bit tricky. In the EIDM interface, the application is PS&R/STAR. I think in the long term we're hoping to update that to make it clear that MCReF is part of that family of systems.

So, PS&R/STAR and then, what we noted before on slide 38, there is a link to CMS website that has a number of documents. One of those is dedicated to how to request the user role. And within that document, it'll kind of walk you specifically through the pages in EIDM and the options to pick as you go along.

Diane Maupai: Thank you, Geoff. So, if all the required "Other" data doesn't fit into 300 – I'm getting this MB, but I'm guessing its megabytes, does this mean we can't e-File?

Geoff Kuhn: In the event that you would generally have an excess of 300 megabytes compressed, after you've already zipped it down, and that's what you need to be doing in order to e-File, then it's correct, you cannot currently use the e-Filing system and you'll need to be submitting that through the more traditional means like the USPS or FedEx. But I do want to emphasize that it is the compressed size, not the uncompressed size.

Diane Maupai: Well, thank you. If we accidentally included our cover letter or IRIS files in the "Other" category, would this cause the Cost Report to be rejected?

Geoff Kuhn: In the case of the cover letter, if you're filing a revision and the system is requiring that you provide a cover letter and you don't put the cover letter in the cover letter slot, the system won't know that you submitted a cover letter, and so, it is not going to reject it, but you're going to get an error that prevents you from filing.

In the case of IRIS, right now, there is no restriction that says you must have the IRIS in the IRIS slot. But longer term that may become something that stops you. Where it knows you need an IRIS but it's not being able to find it, it'll have a prevention mechanism. But, right now, if it was the original submission both of those could be in "Other" and the MAC would – you're just forcing the MAC to go digging to find the stuff that they're looking for.

Matthew Canniere: And for accelerated acceptance, it'll be much more helpful to have it in the correct slots that will make your acceptance process much faster and your ultimate reimbursement come in more timely.

Diane Maupai: Okay. Thanks, Geoff and Matthew. For other documents, my ZIP file – we already answered this one maybe. For other documents, my ZIP file will be over 300 megabytes. What happens when this system becomes mandatory?

Geoff Kuhn: This is Geoff with the system. I think, prior to the system becoming mandatory, I think addressing any type of limitations of that nature would be part and parcel of that deal.

Diane Maupai: How is the officer or administrator of provider, the CFO, notified that a Cost Report is ready to be electronically signed? Does he have to be registered under the EIDM system?

Geoff Kuhn: Per the electronic signature guidance earlier in the deck, there is no in-system back and forth about electronic signature. Electronic signature is something that the organization themselves are doing before they submit and it's up to the organization as to how they go about that.

So, whether they use their own system for managing that or if they are faxing it to each other to be scanned and signed and sent back, that's all outside of MCReF and internal to the organization. Once it's uploaded, there's no requirement that that person be registered in the EIDM because they did the signature and they gave it to the person who uploaded to EIDM or MCReF via the EIDM.

Diane Maupai: Okay. Thank you. Is the e-signature page – is the same as Worksheet S which we would need to print, sign and scan and upload to MCReF?

Geoff Kuhn: The Signed Certification Page is a copy of Worksheet S from the Cost Report. Generally, your vendor software prints that out as a separate version with the encryption codes at the bottom. So, it is the Worksheet S page, but it's the specific one your vendor software produces for the purposes of signing.

Diane Maupai: Thank you, Geoff. Does this webinar qualify for CEU? If yes, how do we get it? And I believe you answered this question already that this webinar is pretty comparable to the two we've held before.

Owen Osaghae: If you attended this one.

Diane Maupai: So, if you attended any of those, it would not be. But if this is your first time attending, it would be. Is this some – and if you go to our MLN Connects call page, on the left, I believe, there is something that says CEUs or partners and we have a list of associations that accept our webinars for CEU credit. So, sorry, I can't be more specific there.

For the valid e-signature, is that actually generated in the software when you finalize the report? Meaning, does the person have to – I can't see the rest of it.

Owen Osaghae: That's slide 49.

Diane Maupai: Okay – like – sorry about that. For the valid e-signature, is that actually generated in the software when you finalize the report, meaning, does the person authorized to sign have to do the process in software like Compu-Max or can you go back once finalized?

Geoff Kuhn: In terms of the signature itself, there is nothing that MCReF is dictating as to how you go about that. It's entirely within your organization and between you and your Cost Report vendor as to how you manage the signature and how you apply it.

At the end – like, once MCReF gets it, what it – we want to make we have is the document with the checkbox checked and the signature or the name printed on that page as what gets uploaded. Beyond that, it's entirely within your process and within your ECR vendor software control as to how you manage that.

Diane Maupai: Thank you. This is our last question. Does the RF file need to be uploaded too?

Geoff Kuhn: The RF file is just another common abbreviation for the ECR. So, depending on what type of Cost Report you file, you might get an RF file or an FM file or an EC file. Those are all different variations of the ECR, and the filename is just changing based on the version that you're using and the vendor software that you're using. That's still the ECR and, yes, that's what needs to be uploaded in the ECR slot.

Diane Maupai: Thank you. Actually, that didn't take too long. We'll take one more. What is STAR?

Owen Osaghae: This is Owen with CMS. STAR is a System for Tracking Audits and Reimbursements. This is used by the MACs to track the Cost Report from the – from the point of receipt to final settlement. All activities that a MAC completes on that Cost Report are all entered into our STAR system.

Additional Information

Diane Maupai: Thank you, Owen. Unfortunately, that's all the time we have for questions today. It looks like there are a number of people that still have questions, so you can see the resources on slide 38 and the contact on slide 40. I'm also going to show you a link to all the MAC websites which will be popping up here in a minute, hopefully.

On slide 41, you'll find information on how to evaluate your experience with today's event. We'll also push out the link to the evaluation on our web – to our webcast participants right now. Evaluations are anonymous, confidential and voluntary. We hope you'll take a few minutes to evaluate your experience with today's event. As a reminder, disable your pop-up blocker for best results.

An audio recording and transcript will be available in about two weeks at go.cms.gov/npc. Again, that is go.cms.gov/npc. And that's the same website I was talking about earlier where you can find the presentation too. I'd like to thank our presenters, Owen and Patrick, and everyone who joined us for today's Medicare Learning Network event, Submitting your Medicare Cost Report Electronically. Have a great day.

Operator: This concludes today's call. Presenters, please hold.