

**New Mexico APCD Data Submission Process Overview**  
**Live Q and A Session (10/18/2022 and 10/28/2022)**  
**Posted Version November 7, 2022**

Is there any file encryption process like Preprocessor or ZIP?

- A preprocessor is not part of NM's APCD submission. ZIP and PGP are supported if suppliers want to compress, encrypt or password protect their submissions. See the Data Submission Guide regarding file naming convention for expected naming conventions.

If a company is only a TPA/PBM of self-funded, standalone prescription benefits (no major medical coverage, no insurance carrier) would they need to register and submit reporting?

- Yes, please register
- At this time ERISA would need to register but would not need to submit files

Will Medicaid data be required to be reported for New Mexico since it's already reported by most payors to CMS?

- NM APCD is working to obtain Medicaid data directly from HSD and will not need to be submitted by payors.

Are Medicare Advantage Plans to be included or excluded from the submissions?

- Included.

To confirm, the test files are due 11/2-12/13/22 and the production/full report is due 1/13/23?

- Correct

Is Behavioral Health included in Medical?

- Yes

Will this recording be made available as well?

- NM APCD will share the presentation.

Are Third-party submitters allowed, e.g., CVS, our PBM?

- Yes.

We still haven't received any information on the registration forms and the testing period starts on 11/2. Shouldn't more time be given for the test file submission window? How can both registration and test file submission occur concurrently when registration is a prerequisite (Ketan Patel)

- Registration should be quick and should be sent on to payers very soon
- Test files can be sent once payers set up and connect their sFTP to Milliman.

Will there be a process to apply for an extension past the current due dates? With the resources we have it is nearly impossible to make the quick timeline.

- Requests for extensions can be sent to [NMAPCD.MedInsight@Milliman.com](mailto:NMAPCD.MedInsight@Milliman.com)
- Extensions will be handled by the NM APCD on a case by case basis.

Will HSD send in Medicaid claims for all payors or will each HealthPlan send in their Medicaid claims? Just trying to zero in on the lines of business applicable. Medicaid, Medicare advantage, commercial, exchange, ASO, etc.

- NM APCD is working with HSD to receive the Medicaid claims, this data will not need to be submitted by data suppliers.
- Medicare Supplemental data is required.
- Additional information on the HIS Act, CDL, and NM APCD rule is available within the presentation and data submission guide.

I've gotten questions about data sharing agreements. Will these be setup between the health plans and Milliman? or the health plans and the NM DOH?

- NM APCD has confirmed data sharing agreements are not required.

Given the short test file submission window of 11/2/22 - 12/13/22, if we need more time to setup our test connection, is there an avenue for an extension or longer testing window?

- Requests may be submitted to the Milliman ticketing system (NMAPCD.MedInsight@Milliman.com)

Are there any plans to share all the questions asked (to date) from all the payers involved as well as the answers to those question, when available? Is there a plan to track and post them to a shared folder or place for all payers to access?

- Yes, this will document will be posted to the NM APCD web page

Can we get a list of threshold percentages and quality checks for all required fields for each of the extracts (Eligibility, Medical Claims, Pharmacy Claims, Dental claims, and Provider)?

- Milliman will share this information as soon as possible.
- This information will also be provided as test files are submitted and validation reports are created for each file.

What is the wavier process if payer cannot meet a data quality threshold? What is the process for submitting any waivers? Will this process be handled through a web portal?

- Milliman will share a validation report for each report, which includes a threshold change request. Yes, this will be handled through this web process.

Will the data be based off any member that resides in the state of NM (NM address)? Or will it be based on policies situated in NM, regardless of address? Or will this be laid out during registration?

- This is based off any covered lives residing in NM.

Can Milliman please share any encryption standards being used for file transmission? for example PGP key encryption? Is there a target folder path in which the files are to be dropped?

- Milliman will share sFTP information during registration. Files will be submitted within the sFTP (anywhere aside from the outgoing folder – which is used to share information from Milliman back to data suppliers).

What is the definition of "Paid" is it the date the claim was processed or the date on the check/EFT?

- Report the date that appears on the: check, and/or remit, and/or explanation of benefits, and corresponds to any and all types of payment in CCYYMMDD Format. If paid/adjudicated date is not available use Processed Date.

How long will file validation process take to go through all the stages before we know the submission is passing or failing?

- Initial submission may take 1-2 day turnaround but once the process is validated for each data supplier, this will be a much shorter turn around.

How will you communicate any data model changes in the future?

- Communications will be sent to the registered data supplier listing. Changes will be communicated by the NM APCD, but it is unlikely that any changes will be made during the implementation period.

How will you determine who to contact for registration? There are multiple representatives from various areas of each carrier on the call.

- Milliman will send a registration email to all email domains that are similar. If Milliman receives multiple registrations for a payer, Milliman will reach out to clarify any discrepancies. This process will be refined during registration to identify a key contact.

How is the communication done with file failures?

- This will be an email with an html report indicating the status for each submission.

Do you require a numeric SSN or will you accept an Alpha /Numeric member id? (Jonna Peotter)

- This is included in the data submission manual. SSN is not required if a consistent member ID is included which can be used to link within all submitted files.

Can you give a little more clarity on the data quality process? Will the process be run on each historical file or only after full historical submission has been submitted?

- The validation process will be 2 phased. Individual file checks will produce a validation report for each submitted file. Once the full submission (all files) has been approved, Milliman will run the full data quality audit report for each data submitter.

Will any written agreements between and among payers, Milliman, and DOH be issued?

- NM APCD has confirmed data agreements are not required.

FTP can take as long as 6 weeks to set up for the larger carriers. Have you taken this into account, as individual users do not have access to FTP to Milliman?

- Any requests for extension can be sent to the ticketing system and Milliman will coordinate responses with the NM APCD.

Is there an enrollment/currently insured volume minimum requirement for us to need to be included in this reporting? Our enrollments are less than 250 for NM and we are not currently selling in NM.

- No, there is not a threshold.

Will there be an email notification with test and production files that have not failed?

- Yes, a response will be sent for passed and failed files.

Will we agree - during the registration process - which files we will be sending monthly? I.e., we will send MC, PC, PV, ME but not Dental claims...

- Yes, this will be identified on the registration form.

It appears that CDL 3.0 will be implemented in January 2023. When will we be expected to comply with Version 3.0?

- NM APCD will not be adopting CDL v3.0 at this point and will provide data suppliers significant notice when a change will be implemented.

Can you confirm the periods expected in the Historical submissions?

- 1/1/20 – Current – Milliman and NM APCD will determine the cut-off for the historical submissions.
  - Paid claims January 1, 2020, through October 31<sup>st</sup>, 2022.

When will current production file submission begin and what are those deadlines?

- 1<sup>st</sup> submission by 1/13/23. Milliman/NM APCD will reach out to suppliers on subsequent timelines for monthly submissions. Milliman targets the end of the month for prior month submission of paid claims (ie. January 31<sup>st</sup> for submission of December paid claims). Milliman will note any deviations during the data supplier registration process.

What is the reporting period or is NM leaving it up to Carriers to determine reporting cadence? The ME file definition is unclear..."a reporting period will be no greater than 6 months..."??

- Historical submission:
  - Paid claims 1/1/2020 through 10/31/2022
  - Data submitters can submit a single set of files with all historical data or the files can be partitioned into smaller time frames if easier for the data supplier.
  - Each file that gets submitted will need to pass the file validations.
  - *Once historical data submissions have been approved, data submitters will be required to submit paid claims through the most recent available month.*
- Monthly production files
  - Each monthly submission thereafter must be submitted and passed by the end of the month.
  - Examples:
    - February 2023 submissions must be approved by March 31, 2023
    - March 2023 submissions must be approved by April 30, 2023

Should data be submitted on any New Mexico covered life, regardless of the location of the client (self-funded employer group) which covers them?

- ERISA (self-funded) is voluntary. All others are required for submission.

If we only have ERISA plans do we need to notify you or fill out some sort of waiver if we choose not to do the APCD Data Submitter?

- Yes, please complete the registration process and indicate the entity only covers ERISA

Are Med Supp plans and Student Health plans considered in or out of scope, the guidance is unclear?

- Non-Medicare covered expenses should be reported (Medicare Supplemental).
- Please reach out to Shandiin Wood ([Shandiin.Wood@doh.nm.gov](mailto:Shandiin.Wood@doh.nm.gov)) with questions related to Student Health Plans.

Are denied claims required as part of submissions?

- Current guidelines NM APCD:
  - Fully denied claims can be excluded.
  - Full details are included in the data submission guide for partially denied claims.

We have less than 25 members active in NM and we are not actively selling any products. Would we be able to request an exemption from submitting the files?

- There is currently not a threshold

Does the data feed affect the HSD MMIS-R system in any way?

- The APCD is a separate effort, and these are not directly connected systems at this point.

Could you explain the mechanism for extension due to the extremely short timeline and this is an entirely new APCD build?

- Extension requests will be logged via a ticket – Milliman will maintain a listing to share with NM APCD.

In terms of test data, please clarify the volume and time period required? Can you confirm that you expect Test data to only pass overall CDL format layout to move onto Production submissions?

- Milliman recommends one month of claims data, with a full eligibility file for the initial test submission.

For Historical data, do you require monthly, quarterly or annual files?

- Historical submission:
  - 1/1/2020 through 10/31/2022
  - Data submitters can submit a single set of files with all historical data or the files can be partitioned into smaller time frames if easier for the data supplier.
  - Each file that gets submitted will need to pass the file validations.

Is there any order for the data submission?

- Milliman does not require a specific order, each individual file will be reviewed independently.

The submission schedule says that Monthly submissions are preferred. If monthly is only preferred (as opposed to required,) then what are the other options for submission schedules? (Or is monthly the only option?)

- Monthly submissions are the requirement for submission to the NM APCD.

Is it possible if you can provide sample files of each file type?

- Milliman will provide a sample deidentified version that adheres to the structure. Milliman is targeting availability before test files are due to be submitted.

How are multiple versions of files handled? For example, corrections to a monthly submission?  
Naming convention does not account for this?

- Milliman requests that data suppliers reach out if working on a production replacement. The naming convention will account for this for submissions on the Milliman side.

Would it be possible to get list of threshold percentages for each element and quality validation rules for the files?

- Yes, Milliman will share this information (this will also be included in the test submission reports).

Will we be required to report a different Payer Code (ME002) for each of our different legal entities?  
Or will the Data Submitter Code (ME001) be the same as the Payer Code?

- Milliman will work with suppliers during the registration phase to identify the appropriate codes. Milliman will discuss with New Mexico when this comes up during data supplier registration.

Types of files expected – Membership, Provider, Medical Claims, Pharmacy Claims, Dental Claims.  
Any exclusions or additions to this list for the initial roll-out? Will each of these be provided separately

- This listing is correct.
- Each file does have a separate layout for submission.

Are pharmacy claims to be reported by the PBM or Pharmacy?

- Milliman recommends whoever is adjudicating the claims (PBM).

Are workers compensation claims required to report?

- Not at this time

If a health insurer provides pharmacy claims data, would you still require the PBM to file the same information or can one party file the information?

- Milliman would request one data source.