

DEPARTMENT OF HEALTH & HUMAN SERVICES  
Centers for Medicare & Medicaid Services  
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**CENTER FOR MEDICARE  
MEDICARE PLAN PAYMENT GROUP**

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TO: All Medicare Advantage (MA) Organizations

FROM: Cheri Rice, Director  
Medicare Plan Payment Group

SUBJECT: Use of Default Data in Encounter Data Submissions

DATE: September 12, 2013

The purpose of this memo is to provide further guidance to MA organizations on the circumstances in which default data may be used when submitting information to the Encounter Data System (EDS). Last year, CMS advised that such default data would be termed “proxy data”. Many MA organizations were concerned by the use of this new term. CMS had not intended to create a legal question when referring to default data as “proxy data”, but given the concerns raised by the MA industry, we are reverting to our original terminology of “default data”.

For the purposes of Encounter Data, we have provided default values that may be used to populate certain fields in order to allow an encounter to pass an edit when the actual data are otherwise unavailable. Use of the specified values for this purpose is not considered false data by CMS. The guidelines for submitting default data are as follows:

- If CMS requires a specific piece of encounter data that the contract sponsor has, and the EDS can accept the required data, the contract sponsor must input the required data.
- If CMS requires a specific piece of encounter data that the contract sponsor has, but the EDS cannot accept the required data, the contract sponsor must input the CMS-provided default values.
- If CMS requires a specific piece of encounter data that the contract sponsor does not have, and CMS has approved default values for that information, the contract sponsor must input the CMS-provided default values.

Please refer to the June EDS Companion Guide at <http://www.csscooperations.com/internet/cssc3.nsf/docsCat/CSSC~CSSC%20Operations~Encounter%20Data~Companion%20Guides?open&expand=1&navmenu=Encounter^Data> for an updated list of ‘proxy’ data. The EDS Companion Guides for July will reflect the change from ‘proxy’ to ‘default’.

If you have any questions about encounter data, or the use of default data in an encounter data submission, please contact [sharon.winchester@cms.hhs.gov](mailto:sharon.winchester@cms.hhs.gov).