



# **RY 2026 PERM+ Data Submission Instructions**

*May 2024*

## Table of Contents

<b>1. Overview.....</b>	<b>1</b>
1.1 PERM+ Process Overview .....	1
1.2 Initial Preparations for PERM+.....	2
1.2.1 <i>The Statistical Contractor’s Role</i> .....	3
1.2.2 <i>The State PERM Team</i> .....	3
1.3 File Development and Submission Timeline .....	4
<b>2. PERM+ Data File Specifications .....</b>	<b>6</b>
2.1 File Structure .....	6
2.1.1 <i>Claim Header and Claim Detail Files</i> .....	6
2.1.2 <i>Beneficiary and Provider Files</i> .....	6
2.2 Universe Parameters .....	7
2.2.1 <i>Program Type</i> .....	7
2.2.2 <i>Identifying Medicaid and CHIP</i> .....	8
2.2.3 <i>Identifying Fee-For-Service and Managed Care for PERM</i> .....	8
2.2.4 <i>Date</i> .....	13
2.2.5 <i>Paid Amount</i> .....	14
2.3 Additional PERM Universe Specifications .....	15
2.3.1 <i>Denied and Zero-Paid Claims</i> .....	15
2.3.2 <i>Service Expenditures Matched at the Administrative Rate</i> .....	15
2.3.3 <i>Claims and Payments Excluded from the PERM Universe</i> .....	16
2.3.4 <i>Payments Excluded by Regulation</i> .....	16
2.3.5 <i>State-only and Other Non-Title XIX /Non-Title XXI Payments</i> .....	17
2.3.6 <i>Medicare Part A and Part B Premium Payments</i> .....	17
2.3.7 <i>Informational-only Data</i> .....	17
2.3.8 <i>Encounter Data</i> .....	18
2.3.9 <i>Rejected Claims</i> .....	18
2.3.10 <i>Payments for Administrative Functions</i> .....	18
2.3.11 <i>Adjusted Claims</i> .....	18
2.3.12 <i>Void and Replace Claims</i> .....	18
2.4 Data Sources .....	19
2.5 Payment Level in the PERM+ Submission .....	19
2.5.1 <i>Payment Level and Third-Party Liability</i> .....	21
2.5.2 <i>Payment Level Identification Challenges</i> .....	22
2.5.3 <i>Identifying Sampling Strata</i> .....	23
2.5.4 <i>Details and Providers Under Fraud Investigation</i> .....	23

- 3. Changes to the RY 2026 PERM+ Data Submission Instructions from RY 2023 .....24**
- 4. Quality Review .....24**
  - 4.1 CMS-64 and CMS-21 Report Comparison to PERM Universe Data .....26
- 5. Data Transmission and Security .....27**
  - 5.1 Submission Media .....27
  - 5.2 Submission Formats .....28
  - 5.3 Transmission Cover Sheet .....28
  - 5.4 File Layouts .....28
  - 5.5 Data Dictionary .....29
  - 5.6 Privacy .....29
  - 5.7 Data Transmission .....30
- 6. Common PERM Data Issues .....30**
- 7. Appendices.....31**
  - 7.1 Fields for PERM+.....31
  - 7.2 PERM+ Transmission Cover Sheets .....31
- Appendix A: Claims Fields for PERM+ Data Submissions .....33**
- Appendix B: Beneficiary Fields for PERM+ Data Submissions.....51**
- Appendix C: Provider Fields for PERM+ Data Submission .....51**
- Appendix D: PERM+ Transmission Cover Sheets .....56**

## 1. Overview

Under the Payment Integrity Information Act (PIIA) of 2019<sup>1</sup>, the heads of Federal Agencies are required to conduct annual reviews of programs under their administration. Based on these reviews, agency heads are then required to identify programs that may be susceptible to significant improper payment, estimate the amount of improper payments, submit those estimates to Congress, and to submit a report on actions the agency is taking to reduce improper payments going forward.

CMS developed the Payment Error Rate Measurement (PERM) program to calculate the rates of improper payment in Medicaid and Children’s Health Insurance Program (CHIP). Improper payment rates are based on reviews of the Fee-For-Service (FFS), managed care, and eligibility components of these programs during each review period.

Before improper payment rates can be calculated, states must submit all of the Medicaid and CHIP claims that were paid or denied during the review period to CMS’ Statistical Contractor (SC). This is a large and complex data request that essentially includes all of a state’s Medicaid and CHIP beneficiary-specific payments and many aggregate payments (together referred to as the PERM “universe”), as well as beneficiary and provider information for claims that are sampled for review.

**Each member of the state’s PERM team, including technical and non-technical staff from the state and any relevant vendors, should receive a copy of these instructions and review them early in the PERM cycle but no later than prior to the state data intake meeting.**

These instructions are intended to guide state staff in the preparation and submission of claims data to the PERM SC. The instructions include information about PERM program areas that are measured, required variables that states must submit, state Quality Control (QC) checks, and data submission security requirements. Appendices include tables of required fields, a Transmission Cover Sheet for QC verification, and specific differences between the Reporting Year (RY) 2023 and RY 2026 PERM cycles.

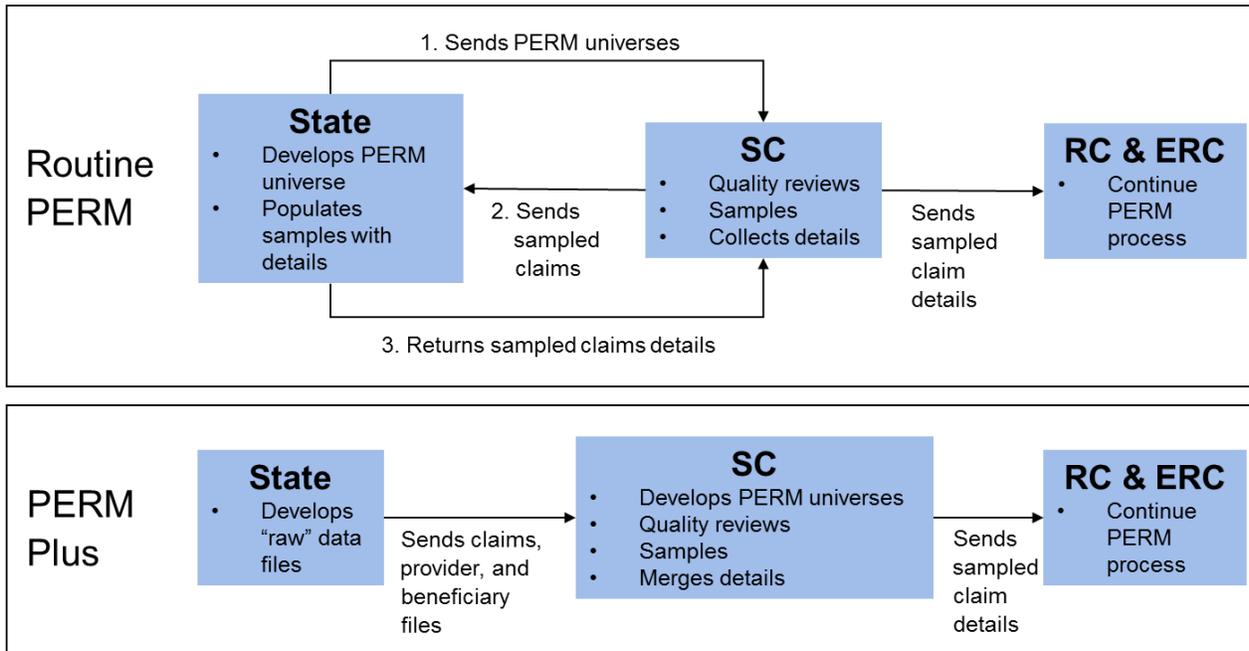
### 1.1 PERM+ Process Overview

PERM+ simplifies the PERM data submission process for states, allowing for claim, beneficiary, and provider data to be submitted simultaneously and eliminating the need for states to submit additional information prior to medical records requests. **Exhibit 1** compares data flow for routine PERM and PERM+.

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<sup>1</sup> As amended by the Improper Payments Elimination and Recovery Act of (IPERA) of 2010, the Improper Payments Elimination and Recovery Improvement Act (IPERIA) of 2012, and the Payment Integrity Information Act (PIIA) of 2019.

**Exhibit 1: Data Flow in Routine PERM and PERM+**



**In early quarters, the amount of assistance needed may be higher so the SC will work with the state to clarify what information is required and in what timeframes.**

PERM+ generally requires less upfront analysis and data modifications by the state. The PERM SC is responsible for assigning and extracting data as “sampling units” (e.g., determining if a claim or payment should be sampled at the header or line level based on the payment methodology, removing records that do not qualify for sampling). The PERM SC is also responsible for dividing the PERM+ data submissions into FFS and managed care datasets for sampling. However, the SC needs the state’s help to understand the data and accurately build universes that meet PERM requirements.

**1.2 Initial Preparations for PERM+**

It is imperative that correct universe data are provided to the SC during the cycle. This ensures that the sampling universe is accurate, contains all required payments, and reflects the data present in the state’s system. Inaccurate or incomplete data or data with incorrect universe identifiers can delay the creation of samples and details, lead to oversamples and resamples of universes, and complicate the eligibility, data processing, and medical records reviews performed by other contractors. This document is intended to provide states with information critical to creating an accurate universe.

**1.2.1 The Statistical Contractor’s Role**

All contractors work closely with the state during the PERM process. Beginning at the start of the cycle, the SC will:

- Assist each state in interpreting and applying the PERM data submission instructions included in this document.
- Schedule meetings with state staff to discuss the data request and learn how the state adjudicates claims and processes other payments.
- Work with state staff to ensure that the state included all required PERM data in their data submissions.

The SC will also respond to state questions throughout the process to ensure mutual understanding of the data requirements and specifications.

**1.2.2 The State PERM Team**

Each state should develop a PERM team that includes program, policy, technical, and budget staff. From experience, CMS has identified the characteristics of effective PERM teams, which are summarized in **Exhibit 2**. In addition to the characteristics outlined below, PERM teams should also include budget and finance staff who are responsible for developing and submitting federal matching fund reports (e.g., quarterly CMS-64 and CMS-21 reports).

**Exhibit 2: Capabilities of Effective PERM Teams**

Program Structure	Data Sources	Technical Aspects of Claim Adjudication
<p>Includes staff from the single state agency and other designated state agencies who are responsible for and knowledgeable of:</p> <ul style="list-style-type: none"> <li>▪ Medicaid and CHIP program administration, development of state regulations and policies, and coordination across the organization(s)</li> <li>▪ Managed care program design, contract administration and oversight, and quality measurement</li> <li>▪ Reimbursement policies for state plan services, rate development for at-risk and/or partial risk contracts, and cost reconciliation arrangements</li> <li>▪ Claims, billing, and payment mechanisms for all federally matched Title XIX and XXI services</li> <li>▪ State-only funded and waiver programs adjudicated in MMIS</li> </ul>	<p>Includes state staff and contractors responsible for the implementation and ongoing support of:</p> <ul style="list-style-type: none"> <li>▪ The state’s Medicaid Management Information System (MMIS) and any Third Party Administrator (TPA)</li> <li>▪ Health insurance premium payment (HIPP) program and payments</li> <li>▪ Pharmacy Benefit Manager (PBM)</li> <li>▪ Behavioral Health programs</li> <li>▪ Other state agencies, systems, and vendors responsible for claims, payments, adjudications, or data warehousing</li> </ul>	<p>Includes staff knowledgeable of data components and processing and those who can apply PERM requirements to identify necessary fields that indicate certain considerations for PERM, including:</p> <ul style="list-style-type: none"> <li>▪ Definition of paid date</li> <li>▪ Treatment of adjustments, denied/voided/rejected claims</li> <li>▪ Services matched with certified public expenditures (CPEs) and the amount</li> <li>▪ Co-pays and Third Party Liability (TPL)</li> <li>▪ Claims billed using local procedure, revenue, or place or service codes</li> <li>▪ Provider contact information for medical and data processing review requests</li> <li>▪ Beneficiary information</li> <li>▪ Original paid date</li> </ul>

### 1.3 File Development and Submission Timeline

The PERM project cycle is expected to take approximately two years. Claims and payment record collection and sampling activities are concentrated in the first four quarters, with states submitting data quarterly beginning October 15, 2024. Improper payment rates are calculated at the end of the review cycle.

**Exhibit 3** outlines the major activities in the data submission process. The quarterly data submission dates are:

- Quarter 1: October 15, 2024
- Quarter 2: January 15, 2025
- Quarter 3: April 15, 2025
- Quarter 4: July 15, 2025

To meet the PERM project deadlines, it is important for states to:

- Begin development of the PERM data submissions as early as possible in the cycle. States should expect to spend time in the first quarter (Q1) of the review period of the measurement (July through September 2024) preparing for the first quarter data submission in October.
- Respond to questions about the PERM universe and resolve any data issues found during data validation and QC. States should expect to respond to questions from October through January, with subsequent data submissions due in January, April, and July.

**Exhibit 3: Major Activities of Data Submission Process**

Date	State Activities	SC/CMS Activities
<b>May - June 2024</b>	<ul style="list-style-type: none"> <li>▪ Determine if the state will submit via PERM Plus or routine PERM</li> <li>▪ Select PERM team</li> <li>▪ Provide completed State Information and State Contact Surveys and applicable data dictionaries</li> <li>▪ Participate in PERM 101 education sessions</li> </ul>	<ul style="list-style-type: none"> <li>▪ Meet with select states to discuss the PERM Plus submission option</li> <li>▪ Answer questions about PERM</li> <li>▪ Send final component sample sizes to each state</li> </ul>
<b>July - August 2024</b>	<ul style="list-style-type: none"> <li>▪ Schedule state orientation meeting</li> <li>▪ Participate in a state Intake Meeting</li> <li>▪ Review, update, and approve notes from Intake Meeting</li> <li>▪ Review Data Submission Instructions</li> <li>▪ Ask questions and provide feedback</li> <li>▪ Notify SC if DUA/BAA is required</li> <li>▪ Test SC secure file transfer site</li> </ul>	<ul style="list-style-type: none"> <li>▪ Organize and participate in state Intake Meeting</li> <li>▪ Develop draft notes from Intake Meeting, modify based on feedback, and send final version</li> <li>▪ Answer questions from and provide feedback to PERM states</li> <li>▪ Request and set up secure file transfer accounts for designated state users</li> </ul>

Date	State Activities	SC/CMS Activities
<b>September 2024</b>	<ul style="list-style-type: none"> <li>▪ Code programs to provide PERM data sets</li> <li>▪ Conduct QC review of PERM universe data and submit test data to ensure its compliance with requirements</li> <li>▪ Ask questions and provide feedback</li> </ul>	<ul style="list-style-type: none"> <li>▪ Answer questions from and provide feedback to PERM states</li> </ul>
<b>October 15, 2024</b>	<ul style="list-style-type: none"> <li>▪ Submit Q1 PERM universe data to the SC</li> </ul>	<ul style="list-style-type: none"> <li>▪ Receive Q1 PERM universe data from states</li> </ul>
<b>October 15 – November 2024</b>	<ul style="list-style-type: none"> <li>▪ Work with SC to verify payment levels for each type of claim</li> <li>▪ Work with SC to resolve issues identified during the data validation and QC process</li> </ul>	<ul style="list-style-type: none"> <li>▪ Confirm payment levels for each type of claim</li> <li>▪ Begin SC test data validation and QC process</li> </ul>
<b>November – December 2024</b>	<ul style="list-style-type: none"> <li>▪ Work with SC to resolve issues identified during QC of PERM universes</li> </ul>	<ul style="list-style-type: none"> <li>▪ Perform QC review of PERM universes</li> <li>▪ Select Q1 samples</li> <li>▪ Schedule Details Intake Meeting with state</li> </ul>
<b>January 15, 2025</b>	<ul style="list-style-type: none"> <li>▪ Submit Q2 PERM universe data to the SC</li> </ul>	<ul style="list-style-type: none"> <li>▪ Receive Q2 PERM universe data from states</li> </ul>
<b>January 15 – March 2025</b>	<ul style="list-style-type: none"> <li>▪ Work with SC to resolve issues</li> </ul>	<ul style="list-style-type: none"> <li>▪ Perform QC review of PERM universes</li> <li>▪ Select Q2 samples</li> </ul>
<b>Within 30 days</b>	<ul style="list-style-type: none"> <li>▪ Work with SC to resolve issues</li> </ul>	<ul style="list-style-type: none"> <li>▪ Finalize details data and transmit the formatted details to the RC</li> </ul>
<b>April 15, 2025</b>	<ul style="list-style-type: none"> <li>▪ Submit Q3 PERM universe data to the SC</li> </ul>	<ul style="list-style-type: none"> <li>▪ Receive Q3 PERM universe data from states</li> </ul>
<b>April 15 – June 2025</b>	<ul style="list-style-type: none"> <li>▪ Work with SC to resolve issues</li> <li>▪ Review CMS-64 analysis and provide feedback to SC as necessary</li> </ul>	<ul style="list-style-type: none"> <li>▪ Perform QC review of PERM universes</li> <li>▪ Select Q3 samples</li> <li>▪ Conduct CMS-64 comparison and analysis</li> </ul>
<b>Within 30 days</b>	<ul style="list-style-type: none"> <li>▪ Work with SC to resolve issues</li> </ul>	<ul style="list-style-type: none"> <li>▪ Finalize details data and transmit the formatted details to the RC</li> </ul>
<b>July 15, 2025</b>	<ul style="list-style-type: none"> <li>▪ Submit Q4 PERM universe data to the SC</li> </ul>	<ul style="list-style-type: none"> <li>▪ Receive Q4 PERM universe data from states</li> </ul>
<b>July 15 – September 2025</b>	<ul style="list-style-type: none"> <li>▪ Work with SC to resolve issues</li> </ul>	<ul style="list-style-type: none"> <li>▪ Perform QC review of PERM universes</li> <li>▪ Select Q4 samples</li> </ul>
<b>Within 30 days</b>	<ul style="list-style-type: none"> <li>▪ Work with SC to resolve issues</li> </ul>	<ul style="list-style-type: none"> <li>▪ Finalize details data and transmit the formatted details to the RC</li> </ul>

## 2. PERM+ Data File Specifications

This section addresses the content of the PERM+ data submissions, including the structure of the submission, PERM payment inclusions and exclusions, and descriptions of the required fields along with requirements for those fields.

### 2.1 File Structure

States participating in PERM+ submit data files to the SC containing all fields required for sampling, data processing review, and medical record request and review (see **Exhibit 4**). Note that all required fields for all claims types might not be in the same system. States submit PERM+ data in three files: claim information, beneficiary information, and provider information.

#### **Exhibit 4: Claims, Provider, and Beneficiary Data Are Required for PERM+ Submissions**



#### **2.1.1 Claim Header and Claim Detail Files**

Generally, states participating in PERM+ include all beneficiary-level Medicaid and CHIP claims and payments that are matched with either federal Title XIX or Title XXI funds.

PERM+ offers states flexibility in the structure of the data files submitted to the SC. PERM+ states may submit:

- One file with claim headers and a second file with claim details
- One file with both claim header and detail data
- Another combination of files (e.g., institutional and practitioner claims in separate files)
- The SC will work with the state to determine the most appropriate file structure

#### **2.1.2 Beneficiary and Provider Files**

The PERM Review Contractor (RC) and Eligibility Review Contractor (ERC) require beneficiary and provider information for all sampled claims. This information is needed before the contractors can request medical records from providers and conduct medical, data processing, and eligibility reviews. States participating in PERM+ submit beneficiary information (e.g., name, date of birth) and provider information (e.g., address, provider type) as separate files. For each sampled claim, the SC will use the beneficiary and provider numbers to “match” to the beneficiary and provider information in the separate files.

When developing the provider file, states should include all available provider records regardless of the provider’s status as an active or inactive provider. The provider file should include information for all billing, performing (servicing/rendering/attending) and referring (prescribing) providers.

When developing the beneficiary file, states should include beneficiary records for all beneficiaries who have a claim in the PERM claims file. The SC will work with states to satisfy these requirements for the provider file and the beneficiary file.

Required provider information is summarized below:

<b>Provider Type</b>	<b>When Required for PERM Claims</b>
Billing Provider	<ul style="list-style-type: none"> <li>▪ <b>Required for all claims</b></li> </ul>
Performing/Service Provider	<ul style="list-style-type: none"> <li>▪ <b>Required for claims paid at the line level</b></li> <li>▪ Should reflect the provider who performed or provided the service to the beneficiary</li> </ul>
Referring Provider	<ul style="list-style-type: none"> <li>▪ <b>Needs to be provided when the billing entity is not the physician who ordered or prescribed the service</b></li> <li>▪ Required for claims for lab, x-rays, physical/occupations/speech therapy, durable medical equipment, prosthetics and orthotics</li> </ul>
Attending/ORP Provider	<ul style="list-style-type: none"> <li>▪ <b>Required for institutional claims</b></li> <li>▪ Should link back to an individual provider and not an institution</li> </ul>
Prescribing Provider	<ul style="list-style-type: none"> <li>▪ <b>Required for pharmacy claims</b></li> <li>▪ The physician who prescribed the medication or supply for the beneficiary</li> </ul>

*It is vital that the Review Contractor have the correct mailing address for medical records requests. Please review the address information available in your system ahead of details submission to ensure the correct information is returned to the SC as required by 431.970 (a)(2). Please note this may be the Correspondence or Mailing Address fields. If the Billing Provider is not the records custodian (e.g. sister state agency, Fiscal Intermediaries, etc.) states should ensure that the Medical Records Contact fields are populated with the appropriate information.*

## **2.2 Universe Parameters**

The PERM+ data submission is primarily defined by three major parameters with PERM specific definitions:

- Program Type
- Date
- Paid Amount (Total Computable Amount)

This section defines and discusses the three primary PERM universe parameters and provides guidance on other areas that are critical to the submission of a complete and accurate PERM universe. This includes the treatment of denied and zero-paid claims, payments and records excluded from PERM, and PERM data sources.

### **2.2.1 Program Type**

The PERM data submission can include up to four data universes, depending on the program structure and service delivery systems operating in each state. Potential universes include:

- Medicaid FFS

- CHIP FFS
- Medicaid managed care
- CHIP managed care

How each universe must be defined for PERM purposes may differ from each state’s definitions of its programs. Identification of Medicaid and CHIP and the division between FFS and managed care is discussed further in the following sections.

The PERM claims file must include all Medicaid expansion and/or stand-alone CHIP payments in the PERM submission, including payments that are paid for in whole or in part by Medicaid (Title XXI) FFP dollars, as well as payments submitted as CHIP (Title XXI) services but denied. This includes any paid or denied claims that are adjudicated by and/or stored with third party data vendors.

### **2.2.2 Identifying Medicaid and CHIP**

States include both Title XIX and Title XXI matched payments in the PERM data submissions. Because CMS must report separate improper payment rates for the Medicaid and CHIP programs, states must separate PERM data submissions between Title XIX and Title XXI and submit these in separate PERM universe files for each quarter. States should separate claims into the Medicaid or CHIP universe based on the following key questions:

The “Fields for Universe Submission” table in [Appendix A](#) also includes a field called “funding code.” States may populate this field with any state-specific value that identifies, or helps identify, the state requested federal Title XIX or Title XXI match for the claim or payment. For the PERM claims file, states are required to include all payments that are paid for in whole or in part by Title XIX or Title XXI Federal Financial Participation (FFP) dollars, as well as those payments considered for FFP dollars but which were denied your state. If your state has difficulty distinguishing between Title XIX and Title XXI payments in either paid or denied claims, please notify the SC who will work with state staff to find an appropriate solution.

If your state processes claims in one universe and then moves them to another universe prior to claiming federal match (e.g., the claim initially processes as Medicaid but is moved to CHIP ahead of claiming), you need to notify the SC. The payments, adjustments, and claiming will be discussed ahead of sampling any quarterly data submissions.

### **2.2.3 Identifying Fee-For-Service and Managed Care for PERM**

In addition to separating Medicaid (Title XIX) and CHIP (Title XXI) payments, PERM also measures FFS and managed care payments independently. Referred to as “component” measurements, FFS and managed care have PERM-specific definitions which may differ from how states define each mode of service delivery. PERM also has additional inclusion rules that are necessary to ensure a complete and accurate PERM universe. An overview of PERM definitions for each “component” is included below, along with information on what types of records are included in each “component” universe.

During each state’s intake discussion, the SC will discuss these component definitions in more detail with the state to ensure that data provided is consistent and compliant with PERM guidance. The SC will also support the state in determining where specific payments should be assigned for PERM purposes.

### *2.2.3.1 Fee-For-Service Universe*

The PERM FFS universe includes three primary types of Medicaid and CHIP payments:

#### **1. Traditional FFS claims**

The FFS universe is comprised of all payments made on a FFS/indemnity basis, including:

- Traditional FFS payments to physicians, hospitals, pharmacies, home health agencies, Long-Term Care (LTC) facilities, etc.
- Medicare crossover claims
- FFS claims for services carved out of managed care
- FFS claims paid for retroactive eligibility periods

#### **2. Fixed non-risk payments**

In addition to traditional FFS payments, the PERM FFS universe also includes other types of payments referred to as “fixed” for PERM purposes. These payments are often capitated, Per-Member Per-Month (PMPM) payments. They could also be system-generated, non-medical, or administrative-like payments that – unlike other PERM FFS payments - would not require a PERM medical record review. Examples of PERM “fixed” payments include a variety of payments made to providers or vendors, such as:

- Monthly Primary Care Case Management (PCCM), Health Homes, or Patient Centered Medical Home (PCMH) fees paid to participating providers
- Health Insurance Premium Payment (HIP) payments made to purchase or subsidize employer-sponsored insurance
- Capitated non-emergency transportation broker payments
- Fixed beneficiary-specific pharmacy dispensing fees (e.g., a state pays nursing home pharmacies a monthly fixed amount per beneficiary or an additional payment is made to MCOs for beneficiaries who are in a behavioral health program)
- Reinsurance payments
- Managed care stop loss payments
- Supplemental payments made to managed care organizations based on service type (e.g., Federally Qualified Health Center (FQHC) or geographic region)

***The SC will work with the state to evaluate state programs and services and determine if any meet the PERM “fixed” payment definition and should be included in the FFS universe.***

**States may also make payments in aggregate based on beneficiary-level information. States and the SC will work together to determine a plan for submitting this payment information.**

### **3. Aggregate payments**

While most Medicaid and CHIP payments are paid at the beneficiary level, states may calculate and pay for some services on behalf of a group of beneficiaries. PERM classifies these payments, which are made for a group of beneficiaries where individual payment records are not readily available or cannot accurately be re-created, as “aggregate payments.”

Unless otherwise specified by CMS, all payments for services to beneficiaries are included in the PERM universe, regardless of whether the state claims FFP at the medical services match rate or as an allowable administrative cost. The SC will work with the state to determine whether certain payments should be classified as aggregate payments for the purposes of PERM. Examples of aggregate payments seen in previous cycles include:

- Reimbursement to counties for non-emergency transportation services provided to all Medicaid beneficiaries residing in that county.
- Contractual payment to a broker for services (e.g., transportation) that cannot be identified at the beneficiary level.
- Fees paid to a case management vendor based on the number of beneficiaries enrolled in the Medicaid program each month.
- Monthly premium payments made to behavioral health organizations at the aggregate level which are not maintained in the state's MMIS system.

In some cases, states may determine payment at the individual level but maintain payment records at the aggregate level. CMS and the SC will work with the state to determine how aggregate payments should be submitted and reviewed for PERM. For example, some states make supplemental payments for FQHC services provided to beneficiaries in a Managed Care Organization (MCO). While these payments are typically made at the beneficiary level, states may only have the payment data available at the MCO level. In this case the payments would be moved to the FFS fixed payments strata for sampling. It is critical that states inform CMS and the SC of all possible aggregate payments so that all payments required for PERM review are included in a universe.

Not all incentive payments meet the requirements for inclusion in the PERM universe. States that make these payments need to provide the following information to the SC: who receives the payment and the basis of the payment.

#### **Other Payments**

States may need to submit other types of payments as part of the PERM universe:

- **Incentive Payments:** A number of states have implemented new programs that make supplemental or “bump” payments for certain types of services. Examples of these payments include difficulty of care payments made to Intermediate Care Facilities for beneficiaries with

developmental disabilities (ICF/IIDs), “bump” payments made to clinic claims to increase them to the Medicare allowable, and health home incentive payments. These are usually small dollar payments that can be tied to individual beneficiaries and services. In rare instances, these payments are made to providers on the aggregate level.

- **Financial Transactions:** The SC usually sees this type of payment for services that are not submitted via the MMIS and for which records are usually kept on paper or spreadsheets. There are numerous situations in which a payment may be made via this method, including payments for services given to qualified aliens, reimbursements for transportation to caregivers, payments for interpreter services, and reimbursements for out-of-pocket expenses.
  - In these types of situations, the state needs to discuss these payments with the SC to determine what the payments are for, if they should be included in the sampling universe, the payment level of the claim, and what information the state will need to submit in the universe data for these payments.
- **Wrap-around payments:** This is a supplemental payment usually made to an MCO to increase the reimbursement for certain types of services. We see this most often with FQHC/Rural Health Clinics (RHC) services. These wrap-around payments provide for supplemental payments from states to FQHCs and RHCs equal to the amount or difference between the payment under the FFS methodology and the payment provided under the managed care contract.
  - If your state makes these types of payments, you need to notify the SC during the intake meeting process.
- **ASO programs** - Payments made to an organization under an Administrative Services Only (ASO) arrangement would be included in the FFS universe. ASOs generally are contracted to manage claims and benefits while bearing little or no risk for the cost of delivering care. There are typically two different scenarios for ASO payments:
  - **Scenario 1:** ASOs receive an Advance PMPM for patient care. Providers bill the ASO for services received by the beneficiaries. The PMPM payment is used by the ASO to pay claims incurred by members. In many cases the payments are later reconciled with the state to the actual claim amounts. In these cases, the state maintains the risk.
  - **Scenario 2:** The ASO is budgeted for a target amount for a set period of time (e.g., a year), but goes over the set amount in reimbursement of services. The ASO will be reimbursed for the difference by the state, and therefore all the risk is maintained by the state.

The SC will work with each state and CMS to evaluate state programs and determine if program payments conform to the PERM managed care definition or if the payments should be included in the FFS universe instead. Please be prepared to discuss any ASO arrangements in your state with the SC during the Intake Meeting.

- **Prepaid inpatient health plan (PIHP)/ Prepaid ambulatory health plan (PAHP)**
  - Prepaid inpatient health plan (PIHP) means an entity that -

- Provides services to enrollees under contract with the State, and on the basis of capitation payments, or other payment arrangements that do not use State plan payment rates.
- Provides, arranges for, or otherwise has responsibility for the provision of any inpatient hospital or institutional services for its enrollees; and
- Does not have a comprehensive risk contract.
- Prepaid ambulatory health plan (PAHP) means an entity that -
  - Provides services to enrollees under contract with the State, and on the basis of capitation payments, or other payment arrangements that do not use State plan payment rates.
  - Does not provide or arrange for, and is not otherwise responsible for the provision of any inpatient hospital or institutional services for its enrollees; and
  - Does not have a comprehensive risk contract.<sup>2</sup>

Please note that while PIHP and PAHP programs are not comprehensive risk managed care, they may still be full risk, if the PIHP or PAHP entity takes on 100% of the insurance risk for covered patient services.

If your state has PIHP or PAHP programs, please be prepared to discuss those with the SC during the intake meetings. Information needed will include which programs operate in your state, where the contracts can be found, and who holds the risk on the contracts.

### *2.2.3.2 Managed Care Universe*

For the purposes of PERM, managed care universes consist of payments made to “at-risk” organizations that provide services to their assigned beneficiaries. These payments are not individual claim payments or reimbursements for individual claims payments. They are typically capitation payments covering multiple services for which the organization — not the state — is at financial risk. These payments, and not the claim payments made by the organizations, are subject to Federal match, and are therefore reviewed under PERM.

These payments include:

- Premiums for “capitated” or “full risk” arrangements, such as payments to Health Maintenance Organizations (HMOs), MCOs, Pre-paid Inpatient Hospital Plans (PIHPs), and Health Insurance Organizations (HIOs).
- Payments to service-specific providers paid as part of capitated arrangements (e.g., PBMs, behavioral health MCOs).
- Condition-specific capitation payments for special needs beneficiaries (e.g., at-risk payments for services provided to people living with Human immunodeficiency virus infection and acquired immunodeficiency syndrome (HIV/AIDS)) who are enrolled in a specialized managed care program.

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<sup>2</sup> <https://www.medicaid.gov/medicaid/downloads/mce-checklist-state-user-guide.pdf>

**Full Risk Managed Care Program**

A provider organization, or group of organizations, receive from the payer a set payment per patient for specified medical services. In this way, the provider takes on 100% of the insurance risk for the covered patient and services.

**Partial Risk Managed Care Program**

Managed care plan pays providers prospectively for a subset of services, such as case management or crisis services, with other services reimbursed on a FFS basis. The plan may be at risk for costs or gains that exceed a predetermined cost for the services covered under the partial risk program.

- Certain non-capitated, beneficiary-specific payments made to MCOs such as newborn delivery supplemental payments or “kick” payments, which include multiple services, are paid at a negotiated rate and not paid on a FFS basis.

While full-risk payments to MCOs are clearly part of the managed care universe, payments associated with certain types of capitated programs may more appropriately be included in the FFS universe (see Capitated Non-Risk Payments, above). The PERM SC will discuss each state program during the data intake process and will work with the state to determine the appropriate universe (FFS or managed care) for each type of payment.

The RC can only accept single-line managed care claims. States should inform the SC about claims for any type of program that have multiple lines (e.g., one line to reflect a behavioral health payment and

another to reflect a physical health payment) so that the SC can determine the best way to create a sampling universe and supply the RC with all the information needed to complete the data processing review.

**2.2.4 Date**

PERM universes include claims and payments originally paid during the review period. For RY 2026 those dates are July 1, 2024 to June 30, 2025. To support consistency across states, PERM relies on the **original paid date** to determine whether a payment falls within a given cycle measurement.

- If a state originally paid a claim during the cycle under review, but adjusted the claim after the PERM measurement period, the claim should be included in the PERM data submission based on the original paid date
- Conversely, if a claim’s original paid date is prior to the PERM measurement period, but an adjustment falls within the PERM measurement period, the claim would not be included in the PERM data based on the original paid date

For the RY 2026 PERM cycle, the state’s PERM universe includes claims and payments with original dates of payment between July 1, 2024 and June 30, 2025.

States submit PERM data quarterly, including all claims with an original date of payment within the review quarter. Data are due to the SC 15 days after the end of each quarter. See **Exhibit 5** for the data submission due dates for RY 2026 and the paid claim dates to be included in each quarterly submission.

**Exhibit 5: RY 2026 Quarterly PERM Data Submission Dates**

<b>RY 2026 Quarter</b>	<b>Claim Date Paid</b>	<b>Data Submission Due</b>
Quarter 1	July 1 – September 30, 2024	October 15, 2024
Quarter 2	October 1 – December 31, 2024	January 15, 2025
Quarter 3	January 1 – March 31, 2025	April 15, 2025
Quarter 4	April 1 – June 30, 2025	July 15, 2025

States often make managed care capitation payments prospectively (e.g., on the 25<sup>th</sup> of the month prior to the month of coverage) or retrospectively (e.g., in the month following the month of coverage). Managed care capitation payments should be included in the PERM data submission based on paid date as well.

- Prospective example: A state makes a capitation payment on December 25, 2024 for services in January 2025; the state includes the payment with the PERM Q2 data submission.
- Retrospective example: A state makes a capitation payment on October 5, 2024 for services in September 2024; the state should include the payment with the PERM Q2 data submission.

**Important notes about the dates used in the sampling universe:**

States may submit the adjudication date instead of the original paid date in the PERM universe as long as the state maintains a consistent date approach throughout all four quarterly submissions. The adjudication date refers to the date that a claim is fully processed and either approved for payment or denied. The state should discuss this approach with the SC during the data intake meeting.

*States may also submit certain types of claims (e.g., off-MMIS claims) using a date approach that is different from the other universe claims, as long as the dates for each data set submitted for those claims are consistent over the course of the year.* For example, a state could submit all MMIS claims using adjudication date but submit all off-MMIS waiver claims from sister agencies using paid date.

The SC will review the dates that are included for each data source with the state at the beginning of the cycle and will work with the state to identify the best date field for determining the PERM universe for each quarter. This information will be relayed to the RC and ERC for use during the data processing and eligibility reviews.

**2.2.5 Paid Amount**

**The total computable paid amount should not include beneficiary cost sharing amounts, such as patient liability (co-pays, contribution to care), TPL, or any other non-Title XIX or Title XXI matched dollars (e.g., taxes paid on waiver services).**

The paid amount for each claim and payment in PERM should reflect the **original, non-adjusted total computable paid amount**. The total computable paid amount is the federal share plus the state and/or local share of the payment. CHIP and Medicaid are jointly funded by the federal and state governments. As such, both funding sources should be represented in the total computable paid amount.

For certified public expenditures (CPEs) such as school-based services or payments to public hospitals, the state must provide both the federal and state/local share for the PERM paid amount even if the paid amount in the payment system only reflects the federal share for which match is claimed. **Please discuss with the SC any CPEs or other payments where the paid amount in the state's payment system might not reflect the PERM-defined total computable paid amount.**

## **2.3 Additional PERM Universe Specifications**

In addition to the three main parameters identified above, PERM universes must also meet additional specifications.

### **2.3.1 Denied and Zero-Paid Claims**

In both the FFS and managed care universes, as defined above, states should include the following types of records, as applicable.

#### *2.3.1.1 Denied Claims*

Denied claims are claims that are adjudicated in the state's payment system but denied for payment. States must submit denied claims as part of the state's PERM+ data submission. Denied claims from vendor payment systems must be included in the PERM+ data submission if the claims are program claims that are not found in the state MMIS. ***In certain instances, states may not be able to determine if a denied claim should be assigned to the Title XIX or the Title XXI program (e.g., a claim that is denied due to an invalid beneficiary identifier). Please discuss the treatment of these denied claims with the SC.***

#### *2.3.1.2 Zero-Paid Claims*

States must include zero-paid claims in the PERM+ data submission. A zero-paid claim is a claim for which the state had no financial liability. For example, claims may be zero-paid due to TPL, a Medicare crossover payment exceeding the state allowable charge, or for spend-down beneficiaries who have not met their financial obligations.

### **2.3.2 Service Expenditures Matched at the Administrative Rate**

PERM includes payments made for medical services received by individual beneficiaries that are matched either at the medical Federal Medical Assistance Percentage (FMAP) or that receive FFP as an allowable administrative cost. The most common medical services that may be matched with administrative funds include Non-Emergency Transportation (NET) or HIPP payments.

Please discuss with the SC any services that are considered an allowable administrative cost, but could be considered a medical service to determine if the service payments should be reported for PERM.

In addition, Fiscal Management Services (FMS) are services and functions that assist the Medicaid beneficiary or his/her family to:

- 1) Manage and direct the disbursement of funds contained in the participant-directed budget and
- 2) Facilitate the employment of staff by the family or participant, by performing as the participant's agent such employer responsibilities as processing payroll; withholding Federal, state, and local tax and making tax payments to appropriate tax authorities; and performing fiscal accounting and making expenditure reports to the Medicaid beneficiary or family and state authorities.

For any self-directed/consumer-directed personal care services in your state, if the expenses were incurred under an arrangement with a FMS vendor, you will need to determine how your state claimed the cost.

- If the cost was incurred as an expense for a direct medical service and claimed via the applicable FMAP, these claims need to be included in the PERM submission.
- If the cost was claimed as a state program administrative expenditure, please notify the SC and provide information/logic on how to identify these payments so the SC can remove them from the PERM submission.

### **2.3.3 Claims and Payments Excluded from the PERM Universe**

Below we provide some specific guidance regarding what types of payments, claims, and records are excluded from the PERM universe. Certain claims and payments for which states receive FFP through Title XIX or Title XXI are explicitly excluded from PERM, either by regulation or in accordance with established policy. During the intake meetings, the SC will discuss these exclusions in more detail to ensure that each state's specific data submission is compliant with PERM requirements regarding excluded data. ***It is vital that all excluded claims are identified in the PERM+ universe to ensure there is a valid sampling universe. Failure to do so can result in dropped samples, oversamples, and resamples that increase the work required by the state and contractors.***

### **2.3.4 Payments Excluded by Regulation**

The PERM regulation explicitly excludes a small number of specific payment types from the universe, when not paid at the individual beneficiary-level, such as:<sup>3</sup>

- Disproportionate Share Hospital (DSH) payments
- Drug rebates
- Grants to state agencies or local health departments
- Cost-based reconciliations to not-for-profit providers or FQHCs
- Mass adjustments
- Lump-sum Graduate Medical Education (GME) payments

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<sup>3</sup> States may include these in the PERM+ submissions if the payments are readily identifiable and the state instructs the SC to remove the payments prior to sampling.

- Express Lane Eligibility (ELE) claims are excluded from eligibility reviews. States should identify these claims in the universe data files so they are only sampled for the applicable reviews. If the state cannot provide this information in the universe file, please work with the SC to determine how ELE can be determined for sampled claims.

### **2.3.5 State-only and Other Non-Title XIX /Non-Title XXI Payments**

Not all claims processed in MMIS are matched with Title XIX or Title XXI funds. Only claims and payments matched with Title XIX and Title XXI federal funds are included in PERM. PERM+ states may include state-only or other federally funded claims and payments in the PERM+ submissions, however, the states must provide documentation and guidance that will allow the SC to exclude these payments from the PERM sampling universes.

### **2.3.6 Medicare Part A and Part B Premium Payments**

States should not include Medicare Part A and Part B premium payments in the PERM data submission. The SC will collect these payments from CMS to include in each state's universe prior to sampling.

**When states receive their Medicaid FFS universe samples, any premium payments that are sampled will be sent to the states in a separate file and are subject to data processing review.** Please be sure to share these samples with any state staff who work with Medicare Premiums and will be providing the documentation needed for completion of DP reviews. Along with the Medicare Premium sample, the SC also provides a file layout which contains the variable names, descriptions, format, and position of each variable. This sample also includes SSNs which can be used to locate the premium payment beneficiaries. The RC will notify the states about what information needs to be provided for these claims during their reviews.

### **2.3.7 Informational-only Data**

States that submit informational-only lines in the universe data **must** provide the SC with a way to identify these lines in the PERM data submissions. Informational-only data is defined as records maintained in the state or vendor payment system that do not represent actual payment to a provider. Examples include:

**Data Issues Caused by Inclusion of Excluded Claims or Lines in the Sampling Universe:**

- Any of these claims that are sampled have to be dropped
- Dropped samples are addressed in two possible ways:
  - Replacement samples are drawn
  - Universe is resampled after excluded lines are removed from the sampling universe
- This situation creates extra work for the states and all contractors (SC/RC/ERC)

- Supporting service lines submitted with an inpatient hospital claim paid via Diagnosis-Related group (DRG) payment.
- FQHC claims with informational-only procedure codes billed in addition to the T1015 procedure code.
- Bundled claims that list out all billed procedure codes when only one code was adjudicated.

PERM+ states should include informational-only data in the PERM+ submissions and the state must

provide documentation and guidance that will allow the SC to exclude these from the PERM sampling universes. If any claims with informational-only lines are sampled, Lewin will include these lines in the details for the RC and ERC.

### **2.3.8 Encounter Data**

States must not include encounter data or “shadow claims” in the PERM submissions. For PERM purposes, encounter data is defined as informational-only records submitted to a state by managed care contractors under an at-risk contract with the state. The records include claims for services covered under a managed care capitation payment. States often collect this data in order to track utilization, assess access to care, and possibly compute risk-adjustment factors for use in risk-adjusting capitation payments. While encounter data records are beneficiary-specific, they do not represent an actual payment made by the state. As a result, these claims are not subject to FFP, and as a result, not included in PERM.

### **2.3.9 Rejected Claims**

States should only include fully adjudicated claims and payments in their PERM submissions. Claims that are “rejected” from the claims processing system prior to adjudication are not part of the PERM review. Often claim rejection occurs in a pre-processor or translator prior to the system assigning the claim an internal control number. PERM+ states may include rejected claims in the PERM+ submissions; however, in that case, the states must provide documentation and guidance that will allow the SC to exclude these from the PERM universes.

### **2.3.10 Payments for Administrative Functions**

As noted above, PERM claims and payments represent services to beneficiaries. Payments made entirely for administrative functions are not included in the PERM review and states should not include these in the PERM submissions. These include payments such as:

- State staff salaries
- Fiscal agents and other administrative vendors
- Outreach funding

*For cases in which a state blends dollars for beneficiary services with administrative payments into a single reimbursement rate, the state should submit the entire payment for PERM review.*

### **2.3.11 Adjusted Claims**

Only original claims and payments are included in PERM. PERM+ states may include adjusted claims and payments in the PERM+ submissions, however in that case, the states should provide documentation and guidance that will allow the SC to exclude any adjustments or refunds from the PERM universes. **Please notify the SC if your state uses a void and replace system.**

### **2.3.12 Void and Replace Claims**

States should notify the SC if they utilize a void and replace system. Claims that are voided should be excluded from the sampling universe as they are not reviewable by the RC. Voided claims should either be removed from the universe data submission or logic should be provided so the SC may remove them.

## 2.4 Data Sources

States generally extract a majority of PERM+ data from their MMIS. However, states often maintain other payment systems that record payments matched with Title XIX or Title XXI funds (and for which the state does not also maintain a payment recorded in MMIS). States must include all payments, including those from non-MMIS systems, in the PERM+ data submissions. PERM+ affords states flexibility to submit data from systems outside MMIS as separate files from the MMIS data.

When reviewing possible data sources, states are advised to consider sources such as:

- Claims paid by separate vendors or third party administrators
  - Pharmacy
  - Dental
  - Vision
  - Behavioral Health
- Claims paid by state agencies (not the Medicaid agency)
- Services for Individuals with Intellectual Disabilities or Developmental Disabilities (ID/DD)
- State-owned facilities such as nursing homes;
- Waiver services (including consumer-directed individualized budgets)
- Claims paid by counties
- Transportation provider payment systems
- Case management costs
- Stand-alone or “manual” systems
- HIPP payments
- FQHCs, RHC, Indian Health Service (IHS) clinics and facilities
- Systems that produce payments such as PCCM payments and non-emergency medical transportation broker capitation payments

**State staff should “follow the money” by reviewing their state’s federal financial reports to determine if a state is capturing payments from all of the data sources.** If a state determines that data from multiple sources populates the CMS-64 and/or CMS-21 Financial Reports, the state should evaluate these data sources to identify claims and payments to include in the PERM data submission.

## 2.5 Payment Level in the PERM+ Submission

Unlike Routine PERM, under PERM+, the SC, not the state, is responsible for establishing the correct payment level for each claim or payment (i.e., header or line level).

States need to submit both header and detail/line records for all claims for PERM+. States also need to provide guidance to help the SC identify header and detail records in the claims submission. **Submitting all of the header and detail information for a claim is a key difference between the PERM+ data submission and the routine PERM data submission.**

**Correctly identifying how claims are paid is important for sampling claims at the correct level; errors at this stage can lead to oversamples late in the cycle.**

The SC will discuss with states the various payment methodologies for claims to understand how different types of claims are adjudicated and paid. The SC will then use the claims and payment data and guidance from the state to identify the appropriate claim payment level and develop the PERM sampling units.

PERM defines a sampling unit as the smallest, individually priced and paid unit available. The PERM universe will have one record for each sampling unit. States must provide universe data at the sampling unit level.

Individual beneficiary-level FFS claims are typically submitted at the line or claim (header) level. A broad definition is provided below and more detail is provided in the following sections.

- **Line level:** If a payment amount is determined to be at the “line” level for each specific service provided, the sampling unit is the line level; each clam line has an opportunity to be sampled; this applies to most physician and outpatient claims that have multiple paid lines on each claim
- Sample of fields from a line paid claim:

clm_id_icn	diag_code_1	diag_code_2	dos_from_clm	line_number	proc_code_line	units_of_svc_paid	amt_paid_line
1234567	43889	431	09012012	0	A4253	2	100.00
1234567	43889	431	09012012	1	A4256	1	150.00
1234567	43889	431	09012012	2	E0607	1	100.00

- **Header level:** If the payment amount is determined to be at the claim level, the sampling unit is at the claim or “header” level; a header level sampling unit has a paid amount that is not associated with any specific line or service; rather, it is based on days, groups of services and/or other related information, encounter rates, or point of sale transactions; this applies primarily to inpatient and pharmacy claims where there are no separate line-level payments
- Sample of fields from a header paid claim:

clm_id_icn	line_number	dos_from_clm	dos_to_clm	diag_code_1	diag_code_2	rev_code	place_of_svc
1234567	0	09012012	09302012	43889	431	0191	2
1234567	1	09012012	09302012	43889	431	0250	2
1234567	2	09012012	09302012	43889	431	0258	2
1234567	3	09012012	09302012	43889	431	0300	2
1234567	4	09012012	09302012	43889	431	0301	2
1234567	5	09012012	09302012	43889	431	0430	2
1234567	6	09012012	09302012	43889	431	0434	2
1234567	7	09012012	09302012	43889	431	0460	2

**Important notes about payment level determinations:**

- For FFS claims, note that if payment amount determination is made for the claim as a whole, regardless of the number of lines, and the individual lines are informational but not used for payment, it is a header level payment. If each line in a claim stands the chance of being paid or denied individually, these are line level payments.
- For managed care payments made to full-risk entities and for payments made to partial-risk or non-risk entities on a PMPM basis, the sampling unit is typically the capitated amount that is paid each month on behalf of the Medicaid or CHIP enrollee. When an actual payment to an entity spans multiple months of coverage, the sampling unit would be the total amount paid to the entity for the enrollee at one time.
- For aggregate payments, CMS, the SC and the RC will work with your state on each payment identified to determine the smallest paid amount available for electronic submission. For example, an aggregate payment sampling unit could be a monthly payment to a county for all transportation provided to Medicaid enrollees in that month or a quarterly pay-for-performance payment to a provider based on the provision of a certain number or set of services provided to individual enrollees.

**2.5.1 Payment Level and Third-Party Liability**

**As mentioned earlier in this document, the total computable amount submitted in the claims universe should not contain any TPL payments. Including this amount in the Paid Amount field can result in claims being sampled in the incorrect strata if the TPL is taken out at a different level than the one at which the claim is typically paid. Correctly identifying how claims are paid is important for sampling claims at the correct level; errors at this stage can lead to oversamples or resamples late in the cycle.**

TPL is the portion of the allowed Medicaid/CHIP reimbursement that is paid by other insurance or the beneficiary.

To accurately report the amount that Medicaid or CHIP paid for services excluding TPL for PERM, states should submit line level claims, such as physician claims, where TPL is reported at the header level as header level sampling units. For most states, only the claims with TPL would be reported as header level sampling units. Claims without TPL should be reported as line level sampling units.

The state should review with the SC any beneficiary cost-sharing policies and requirements – such as co-pays and deductibles - before preparing data submissions. The state will need to identify how cost-sharing is reflected in the data and at what level federal match is provided (i.e., claim paid amount or individual line paid amount) to ensure the total computable paid amount is accurately identified. Identification of claims with TPL is vital to ensuring that claims are both sampled at the correct level and accurately reflect the total computable amount.

### **2.5.2 Payment Level Identification Challenges**

For certain types of claims and payments, it can be difficult to accurately identify the appropriate “payment level” for PERM purposes. States should pay particular attention to certain types of claims for which the payment level might differ from other payments for similar services and communicate those to the SC. Examples are discussed below.

- **Bundled payments:** In some states, providers submit denied or \$0 paid informational line details with claims that are paid at a bundled rate. These informational line items should be included in the PERM+ universe submission (as discussed in Claims and Payments Excluded from the PERM Universe, above) but the state MUST provide logic to be able to identify and remove the informational lines prior to sampling.
- **Medicare crossover claims:** Medicare crossover claims are often paid on the basis of the type of service, and the universe file will need to capture these payments at the header or line item level, as appropriate to each payment. States need to provide the SC direction about the best way to identify crossover claims in the universe data.
- **Payments made to state-owned facilities or out-of-state facilities:** Some states pay state-owned facilities differently than private providers. If this is the case, be certain to select the appropriate header or line value for the PERM universe.
- **Compound drugs:** Many times, the payment rate for compound drugs is different than for other pharmacy claims. Please be sure to verify the payment level for these claims and ensure that, at the details stage, all billed National Drug Codes (NDCs) can be provided to the SC.
- **Clinic claims:** Clinic claims paid under an all-inclusive code (i.e., T1015) are treated similarly to header level claims. Only the line with the all-inclusive code will be eligible for sampling. All other lines are informational only and should not be subject to sampling but are required to be present in the details.
- **Multiple units of service:** Multiple units of service recorded on a single line should not be divided into multiple sampling units if the units were priced and paid on the same line. For example, a procedure code having 2 units should not be made into 2 records of one unit each.

**A sampling unit should never be represented multiple times within a universe file or included in more than one universe file across programs or across quarters. For line-level claims, the same ICN and line number combination should not repeat. For header-level claims, the same ICN should not repeat. If a claim is submitted at the header level, the associated lines should not be included in the sampling universe. Likewise, if a claim is submitted at the line level, the associated header should not be included in the sampling universe.**

Again, the SC will work with the state to evaluate payments and help determine if the state should include the payment in the PERM universe at the line level or the header level.

### **2.5.3 Identifying Sampling Strata**

For RY 2026, the SC will use payment-based stratification. The FFS universe is stratified into five dollar-weighted strata with an additional stratum for claims that cannot receive Medical Record Review. The managed care universe will continue to be stratified by payment amount only. The SC will assign each payment in the FFS PERM universe to one of six strata, which include:

- Fixed Payment Strata (MEDICAID) – Stratum will include fixed payments, Medicare premium payments, aggregate payments, and Medicare crossover claims. The count of sampled claims from this stratum will be capped at no more than 10% of the sampled payments each quarter.
- Fixed Payment Strata (CHIP) – Stratum will include fixed payments, aggregate payments, and Medicare crossover claims (if applicable). The count of sampled claims from this stratum will be capped at no more than 10% of the sampled payments each quarter.
- Five (1-5) Payment-Weighted Strata (MEDICAID AND CHIP) – All FFS claims that do not fall into one of the strata listed above will be classified into one of five payment strata. *The count of sampled claims from each payment-weighted stratum will be two claims at a minimum for each quarter.*

### **2.5.4 Details and Providers Under Fraud Investigation**

Even though states using the PERM+ methodology should send in complete data submission with the universe data, the SC does, on occasion, have to request additional information from the state or ask clarifying questions. This follow up will be done via email and a Details Intake Meeting will be held once the first FFS sample has been selected and the details reviewed.

As soon as the state receives their sampler files they should begin reviewing them. The state should review the providers for all sampled claims to see if they are under an active fraud investigation. States may notify the SC during the details process and the SC will ensure that the RC does not reach out to the providers for documentation. We strongly encourage states to proactively identify these claims so as not to risk an ongoing investigation. Please note that states may advise the RC to continue to contact providers suspected of fraud if they feel that additional contact with the provider would risk the investigation.

In the event that a state determines that a provider is under investigation after details are finalized, and does not want PERM to continue contact, states may notify CMS and the cycle contractors. If reviews have already begun, then the RC will cease contact at that point.

Claims associated with these providers will be represented as no documentation improper payments in the state's rate. However, this generally impacts a limited number of claims and has a low impact on a state's improper payment rate. If a state is concerned that the identified claims would affect its rate, the state can notify the SC and ask how improper payments on these claims would impact the state's overall improper payment rate. This can help inform the state's decision on whether to have PERM contact the provider or not.

Improper payments for these claims will not be required to have a corrective action and will be noted as such in the CAP template.

### 3. Changes to the RY 2026 PERM+ Data Submission Instructions from RY 2023

There have been updates to the required fields since the RY 2023 cycle.

Claims Fields	Description
<b>Capitation Reason Code</b>	This field contains information about the type of capitation payment made (e.g., PN – Payment Normal, PR – Payment Retro, RA – Rate Adjustment)
<b>Federal Medical Assistance Percentage (FMAP)</b>	FMAP (or Enhanced FMAP) applicable to the specific payment based on member eligibility, date, and service category.

### 4. Quality Review

States are responsible for performing a quality review of their PERM+ data submissions each quarter before submitting files to the SC. Quality review saves time and resources for both the state and CMS contractors by identifying data problems early in the PERM process. **Exhibits 6, 7, and 8** contain suggested minimal QC checks for states to complete.

#### Exhibit 6: Minimum Claims File Quality Control Checks

Quality Review	Suggested Tests
1) Ensure all required fields are reported in the claims file(s).	<ul style="list-style-type: none"> <li>▪ Prepare a list of all fields in the state’s claims file and compare to the list of fields for the claims file in Appendix A.</li> <li>▪ Identify any missing fields.</li> <li>▪ Determine why the field is missing; if the state does not report a field, let the SC know when submitting the file.</li> </ul>
2) Check that key fields are properly formatted and have valid values.	<ul style="list-style-type: none"> <li>▪ Check that key fields are not truncated or contain extra data. Review fields such as                             <ul style="list-style-type: none"> <li>• Internal Control Number (ICN);</li> <li>• Line Item Number;</li> <li>• Billing Provider Number;</li> <li>• Beneficiary ID;</li> <li>• Total Computable Amount Paid Header;</li> <li>• Total Computable Amount Paid Line; and</li> <li>• Dates of payment.</li> </ul> </li> </ul>
3) Check that the dates of payment for all records are within the appropriate quarter in RY 2026.	<ul style="list-style-type: none"> <li>▪ Review the values in the paid date field.</li> <li>▪ Only include payments that were adjudicated in the appropriate quarter of RY 2026.</li> </ul>

Quality Review	Suggested Tests
<p>4) Confirm that the SC can identify claims as Medicaid (Title XIX) or CHIP (Title XXI).</p>	<ul style="list-style-type: none"> <li>▪ Review programming logic and outputs to make certain that claims in the Medicaid universe were matched with Title XIX funds and claims in the CHIP universe were matched with Title XXI funds. This check includes sharing funding source information so that the SC can identify Title XIX FFP or Title XXI FFP.</li> <li>▪ Please note, Medicaid expansion (M-CHIP) claims reimbursed with Title XXI funds belong in the CHIP universe for PERM purposes. Any logic that your state uses to create a Medicaid/CHIP indicator or to separate out CHIP and M-CHIP claims may be useful to document for the SC to recreate.</li> </ul>
<p>5) Confirm that the SC can identify claims as FFS or Managed Care.</p>	<ul style="list-style-type: none"> <li>▪ Confirm that data are present and documentation is available that would allow the SC to assign claims to FFS or managed care universes.</li> <li>▪ Review notes from intake discussion and subsequent communications with the SC and CMS to ensure the universes contain the required types of claims and payments.</li> <li>▪ If PERM “fixed” payments will be submitted with the managed care data, be sure to notify the SC and provide guidance on how to identify the payments so they can be moved to FFS.</li> </ul>
<p>6) Check that the following payment records can be identified by the SC:</p> <ul style="list-style-type: none"> <li>▪ Adjustments and voids</li> <li>▪ State-only claims</li> <li>▪ Administrative payments</li> <li>▪ Gross adjustments</li> <li>▪ Claims matched with funds other than Title XIX or Title XXI</li> </ul>	<ul style="list-style-type: none"> <li>▪ Confirm that data are present and documentation is available that would allow the SC to identify and remove these records from all data sources.</li> </ul>
<p>7) Each payment is represented only one time in the claims file.</p>	<ul style="list-style-type: none"> <li>▪ Confirm there are no ICN-line number combinations repeated in the claims file.</li> </ul>
<p>8) Confirm that no encounter claims data is submitted in the claims file.</p>	<ul style="list-style-type: none"> <li>▪ Remove all encounter records or provide logic for Lewin to remove these records.</li> </ul>
<p>9) Prepare to review the SC’s comparison of the CMS-64/21 reports to the PERM universe submissions.</p>	<ul style="list-style-type: none"> <li>▪ Compare PERM universe totals to either two previous quarters’ CMS-64/21 reports, or to the current quarter’s CMS-64/21 reports.</li> <li>▪ Look for major dips or spikes or “significant” differences.</li> </ul>
<p>10) Compare the universe size to previous quarterly submissions.</p>	<ul style="list-style-type: none"> <li>▪ Sum number of claim lines and paid amount and compare across quarters.</li> <li>▪ Note the reason for any significant changes.</li> </ul>

**Exhibit 7: Minimum Beneficiary File Quality Control Checks**

Quality Control Check	Suggested Tests
1) Make sure all required fields are reported in the beneficiary file.	<ul style="list-style-type: none"> <li>▪ Prepare a list of all fields in the state’s beneficiary file and compare it to the list for the beneficiary file in <a href="#">Appendix B</a>.</li> <li>▪ Identify any missing fields.</li> <li>▪ Verify there is no truncation of variable values.</li> <li>▪ Determine why the field is missing; if the state does not report a field, let the SC know when submitting the file.</li> </ul>
2) Check that the Beneficiary Number field is properly formatted.	<ul style="list-style-type: none"> <li>▪ Check that the Beneficiary ID field is not truncated or has additional data.</li> <li>▪ Replace the data in the Beneficiary ID field if formatting problems are found.</li> </ul>

**Exhibit 8: Minimum Provider File Quality Control Checks**

Quality Control Check	Suggested Tests
1) Make sure all required fields are reported in the provider file.	<ul style="list-style-type: none"> <li>▪ Prepare a list of all fields in the state’s provider file and compare it to the list for the provider file in <a href="#">Appendix C</a>.</li> <li>▪ Identify any missing fields.</li> <li>▪ Determine why the field is missing; if the state does not report a field, let the SC know when submitting the file.</li> </ul>
2) Check that key fields are properly formatted.	<ul style="list-style-type: none"> <li>▪ Check that the Provider Number or the Provider NPI field is not truncated or has additional data depending on which field the state uses to identify providers.</li> <li>▪ Replace the data in the Provider Number or the Provider NPI field if formatting problems are found.</li> <li>▪ Ensure that the Provider Number is a unique identifier in the Provider File and matches the Provider Number in the Claims File (i.e., Provider information can be merged onto the claims data file supplied).</li> <li>▪ Include all billing, performing, attending for institutional claims, referring, and prescribing providers in the file.</li> </ul>

**4.1 CMS-64 and CMS-21 Report Comparison to PERM Universe Data**

States should compare their PERM+ data submissions to CMS-64 and CMS-21 Financial Reports, respectively, to ensure that the universes are complete and accurate. Comparing the PERM+ data to the CMS Financial Reports ensures that no programs (likely not in MMIS) that appear on the CMS Financial Reports have been omitted from the PERM+ data and that the state is capturing all necessary data sources in the PERM+ data submission.

This comparison may identify data which does not fit cleanly into the definitions previously discussed in these submission instructions. For example, the CMS Financial Reports include non-beneficiary-specific payments, such as aggregate provider reconciliations. When aggregate or similar payments are identified on the CMS Financial Reports, we ask that states bring this to the

attention of the SC so that we can investigate whether these should be included in the PERM+ data on a case-by-case basis. Lewin begins these comparisons as soon as Quarter 1 data is sampled.

**All claims submitted to the SC under the CHIP program should be matched with Title XXI funds; these are reported on three forms, 64.21U, 64.21U-Waiver, CMS-21. If you believe some CHIP claims submitted for PERM review are reported on any other forms, please notify the SC. No Title XXI matched claims should be included in the PERM Medicaid universe.**

If after this comparison the state identifies Medicaid or CHIP dollars that were excluded from the PERM+ data, the state should notify the SC to coordinate the submission of the missing data. The CMS-64 and CMS-21 forms may not be finalized until after the PERM+ data are submitted, so we ask that states conduct these comparisons after the forms are finalized and as necessary review forms submitted from previous quarters to see if any adjustments were made after the initial submission that will need to be communicated to the SC during reconciliation.

The comparison that the states are asked to do is separate from the in-depth comparison that the SC will conduct throughout the cycle. The SC will identify the portions of the CMS-64 and CMS-21 Financial Reports that are not appropriate to compare to PERM universes (excluded claims, drug rebates, adjustments, etc.), remove these from the CMS-64 and CMS-21 Financial Report Totals, and separate the CMS-64 and CMS-21 totals between FFS and managed care. If significant differences, as defined by CMS greater than 15% per quarter and 5% overall, between PERM universes and the Financial Reports are identified, the SC will contact the state to resolve the differences. **Please note that if significant differences are found, the SC may halt sampling and details work on impacted universes until the discrepancies are resolved.**

## **5. Data Transmission and Security**

This section discusses the PERM+ data submission media, PERM+ data submission formats, Transmission Cover Sheet and QC verification, and data transmission and security.

### **5.1 Submission Media**

Data transmission is a vital part of the state's work with the SC. To be able to send and receive files, states need a clear understanding of how the SC's SFTP functions and how to quickly and easily troubleshoot any issues that may arise. Data transmitted via the SC's SFTP includes, but is not limited to, quarterly data transmissions from states, claims-specific questions from the SC containing Protected Health Information (PHI)/Personally Identifiable Information (PII), and sampler/details files from the SC.

**States should never use email to transmit documentation containing PII or PHI.** The SC uses xfiles as the secure file transfer solution to send or receive documentation containing PHI or PII. Examples of documentation that the state may transmit to the SC include the following:

- Claims and payment data
- Financial transactions
- Responses to questions that contain beneficiary-specific information.

The state may choose to have multiple users establish access to the SC's SFTP or may need to have separate folders created within the state folder. Users can establish accounts at any point during the cycle, but it is recommended states establish accounts before the Quarter 1 data submission begins for the state's current cycle to troubleshoot any access issues. The SC also recommends submission of test data ahead of the Quarter 1 data to ensure the SFTP can be accessed and that there are no issues in file transmission.

The SC will send instructions to states at the beginning of the cycle to help states register, access the site, and submit data; change your SFTP password; and find support if needed. The instructions contain directions and screenshots to address all steps in the process. If at any time a state representative needs support or has questions regarding the SC SFTP, they should reach out to their Data Manager or contact the general PERM SC inbox at PERM\_SC@lewin.com.

See the Data Transmission section below for information on passwords and encryption.

## **5.2 Submission Formats**

The SC prefers receiving data in one of three formats: SAS data set, delimited file, or flat file.

- SAS data set: PC-based SAS data set
- Delimited file: Comma delimited (.csv) or delimited (pipe, tab, etc.) text (.txt)
- Flat file: A universal text format with a single fixed record length and layout (also called a "flat format" or "ASCII format"); if the state submits text files, except for the first row of the field names, do not include any log or summary information at the beginning or at the bottom of the data file

## **5.3 Transmission Cover Sheet**

The state must submit a Transmission Cover Sheet with every data submission. The Transmission Cover Sheet is used to ensure that all the data sent by the state is received by the SC, and to compare the control totals and to correct any potential data transmission errors before processing and sampling the data. Examples of the Medicaid FFS and Medicaid managed care data Transmission Cover Sheets are provided in [Appendix D](#). The state may email the cover sheet to the SC or submit as a separate file through the SFTP. SC will not process the data further until the control totals match.

## **5.4 File Layouts**

States are required to submit file layouts to inform the SC of the field name, length, and type (numeric versus character), and valid values as applicable. File layouts are required to the SC ahead of the state's first quarterly data submission and any time there is a change made to the initial file layout. If files are submitted from multiple sources or in multiple formats the state should submit a separate file layout for each of the files. Failure to provide this documentation will delay the SC's work on the state data submission. This is critically important in processing the files. Failure to submit correct and complete file layouts may lead to:

- Truncation of data
- Missing required fields

- Inability to remove non-PERM compliant records from the universe, which may in turn lead to oversampling
- Delay reviews

## 5.5 Data Dictionary

For each data source included in their PERM+ submission, states are required to submit a file in Excel, CSV, Word, or other text detailing the values in each variable field and what they stand for. For example, claim type variable can have values, such as: “I”, “O”, “3”, “6”, and data dictionary would indicate “I” = “Inpatient”, “O” = “Outpatient”, “3” = “Clinics”, and “6” = “Fixed Payment”. If the field has standard codes, like ICD9/10, diagnosis codes, or procedure modifiers, these variable values do not need to be provided in the data dictionary. States must ensure that valid values listed in the data dictionary match the values in the claims data.

**Required** tabs/pages in the data dictionary:

- FFS
  - Claim Type
  - Provider Type
  - Billing Provider Specialty
  - Service Category
  - Place of Service
  - Local Codes (procedure, revenue, place of service, etc.)
  - Beneficiary Aid Category/Beneficiary Eligibility Category
  - Funding Code
  - Beneficiary County (if county names are not used)
- Managed care
  - Payment Type
  - Program Type
  - Beneficiary Rate Indicator
  - Beneficiary Aid Category/Beneficiary Eligibility Category
  - Funding Code
  - Beneficiary County (if county names are not used)

## 5.6 Privacy

The SC is committed to protecting the confidentiality, integrity, and accessibility of sensitive data. PERM states should comply with HIPAA Privacy and Security Rules, CMS Business Partners Systems Security Manual rules for sensitive data transfer, and state privacy and security rules.

Data that include Protected Health Information (PHI) and/or Personally Identifiable Information (PII), such as beneficiary ID numbers, is considered sensitive data.

### 5.7 Data Transmission

All data transmissions containing PHI or PII must conform to the FIPS 140-3 standards and comply with proper password protection and encryption procedures.

The SC will only accept data files via SFTP transmission.. **Do not send PERM data via email.**

#### Follow these steps if sending data via SFTP.

- 1) Contact the SC to discuss the SFTP site, establish an SFTP connection, and test the SFTP prior to data submission.
- 2) Encrypt and password-protect data files.
- 3) Zip all PERM data files, including the Transmission Cover Sheet and file layouts, into a single zip file.
  - Note: For very large files, more than one zip file may be necessary. Contact the SC for more information.
- 4) Upload the zipped file to the SFTP.
- 5) Email a copy of the Transmission Cover Sheet and password(s) to [PERMSC.2026@Lewin.com](mailto:PERMSC.2026@Lewin.com) to indicate that the PERM data is available on the SFTP site. **Data is not considered as submitted until this email has been sent to the SC.**

## 6. Common PERM Data Issues

**Exhibit 9** lists common PERM data issues faced in prior cycles and outlines the state’s responsibility to mitigate these issues.

**Exhibit 9: Common PERM Data Issue**

PERM Data Issue	State Responsibility
Vendor Data	<ul style="list-style-type: none"> <li>▪ Ensure that all state vendors participate in the SC intake meetings and data from all state vendors is included in the data submission</li> <li>▪ Send the file layout and data dictionary for each data source to the SC ahead of the Quarter 1 data submission</li> <li>▪ Notify the SC if the claims information in the vendor system (paid dates, paid amounts, payment status, etc.) differs from what is provided in the universe data</li> <li>▪ Notify the SC if claims information in the vendor system is stored in another system (i.e., MMIS or data warehouse)</li> <li>▪ Ensure that all vendor data dictionaries are sent to the SC</li> </ul>
M-CHIP and S-CHIP Claims	<ul style="list-style-type: none"> <li>▪ Notify the SC if your state has a Medicaid expansion program</li> <li>▪ Provide the SC with the information needed to identify these expansion claims in the universe data</li> <li>▪ Verify the match type that these claims receive and provide that information to the SC</li> </ul>

PERM Data Issue	State Responsibility
	<ul style="list-style-type: none"> <li>Provide the SC with the logic that your state uses to create the Medicaid/CHIP indicator or to separate out S-CHIP and M-CHIP claims so the SC can recreate these indicators</li> </ul>
CMS 64/21 Reconciliation	<ul style="list-style-type: none"> <li>Ensure that the data and financial staff attend the 64/21 intake meeting</li> <li>Work with financial staff to ensure that all federally matched data is included in the universe</li> <li>Check the quarterly 64/21 reports to ensure that all required data is being submitted to PERM</li> <li>If you receive notification that the 64/21 reconciliation numbers are outside the allowed threshold, provide information needed to address the differences within the timeframes requested by the SC</li> </ul>
Missing Provider and/or Beneficiary Information	<ul style="list-style-type: none"> <li>Review universe data submission and verify that all required provider and beneficiary fields are populated</li> <li>Send an explanation to the SC for any fields that are blank (not always present on denied claims, not applicable for aggregate claims, will be provided only for sampled claims, etc.)</li> <li>Notify the SC if provider/beneficiary information reside in multiple systems – for example at the vendor and at the state/MMIS</li> </ul>
Timeliness	<ul style="list-style-type: none"> <li>States need to review the cycle timelines as well as the state-specific timelines sent over by your Data Manager</li> <li>If the state anticipates any delays – in submitting data, responding to questions, or providing information needed for details – the SC should be notified as soon as possible</li> <li>Delays in completion of sample and detail files cause delays in the start of reviews by the ERC and RC</li> </ul>

## 7. Appendices

### 7.1 Fields for PERM+

Appendices A, B, and C list the fields for states to include with the PERM+ data submissions. PERM+ data submissions include provider, beneficiary, and full claim detail information. States do not need to submit “detail” information after claim sampling. However, this does require the inclusion of more fields in the PERM+ data submission—similar to the field requirements in the routine PERM detail submission.

The data fields to include in each PERM+ file are described in the following appendices:

- [Appendix A](#): Claims File
- [Appendix B](#): Beneficiary File
- [Appendix C](#): Provider File

### 7.2 PERM+ Transmission Cover Sheets

[Appendix D](#) shows copies of the Transmission Cover Sheets that states should use when submitting files for PERM+. There are separate cover sheets for the claims file, beneficiary file,

and provider file. State should use copies of these transmission cover sheets to report the control totals for each file for each quarter of data submitted for PERM+.

## Appendix A: Claims Fields for PERM+ Data Submissions

Field Designation	Standard Field Name	Field Description	Required for FFS	Required for MC	Standard Field Format	Quality Review
Internal Control Number (ICN)	icn	Unique claim identifier (e.g., ICN, transaction control number (TCN), other state issued number)	X	X	varchar	Ensure the field is not truncated and does not contain extra data Each record in the Claims File must be able to be uniquely identified with data elements contained in the record, typically a combination of ICN and Line Number If the ICN/Line Number is not sufficient to uniquely identify a claim, the state must identify fields that can be used to uniquely identify a claim
ICN Former	icn_former	For adjustment claims, the state-assigned ICN or TCN of the claim that the current claim is adjusting	X	X	varchar	
Claim Type	clm_type	State claim type indicator, typically identifying whether the claim is an institutional, medical, or crossover claim	X	X	varchar	State-specific values
Medicaid/CHIP Indicator	medicaid_chip	Indicator identifying the record refers to a Medicaid (Title XIX) or CHIP (Title XXI) payment.	X	X	numeric	1 - Medicaid (Title XIX) 2 - CHIP (Title XXI)
State Funding Code	state_funding_code	Code that indicates whether the claim is matched with Title XIX, Title XXI, state-only or local funds, or other funding source.	X	X	varchar	State-specific values

***RY 2026 PERM+ Data Submission Instructions***

Field Designation	Standard Field Name	Field Description	Required for FFS	Required for MC	Standard Field Format	Quality Review
Record Type	record_type	Code indicating whether the record is a claim header or a detail/line.	X	X	varchar	'H' – Header Record 'L' – Line Record
Fixed Payment Indicator	fixed_payment_ind	Code indicating whether the claim or payment conforms to the PERM Fee-For-Service (FFS) fixed/capitated payment definition.	X		numeric	0 - FFS Claim 1 – Capitated or Fixed Payment
Adjustment Indicator	adjustment_ind	Code indicating whether the claim/line is an adjustment and the type of adjustment (e.g., original claim, void, credit, debit, etc.)	X	X	varchar	State-specific values
Date Paid Header	date_of_payment_header	The date a claim or payment was originally adjudicated or paid; not the check date (unless there is no adjudication date)	X	X	varchar (mm/dd/yyyy)	
Medicare Crossover Indicator Header	mcare_xover_ind_header	Header-level indicator that a claim is a crossover claim from Medicare to Medicaid	X		varchar	“Y” = Crossover “N” = Not a Crossover Ensure all values are coded as “Y” or “N” and the field is populated for all records
Category of Service	service_category	Classification for broad types of state/federal covered services	X		varchar	Can be Medicaid Statistical Information System (MSIS) category of service or state-defined service type

<b>Field Designation</b>	<b>Standard Field Name</b>	<b>Field Description</b>	<b>Required for FFS</b>	<b>Required for MC</b>	<b>Standard Field Format</b>	<b>Quality Review</b>
Source Location	source_location	The system of origin/location in which the claim was originally adjudicated	X	X	varchar	State-specific values
Payment Status Header	payment_status_header	Paid or denied indicator for a claim as it was originally adjudicated; should not reflect an adjusted payment status	X	X	varchar	State-specific values
Total Computable Amount Paid Header	amt_paid_header	Total computable amount for the claim (at the header). Total Computable Amount = Federal Share + State Share + Any local share Amount paid should be net of all beneficiary and third party cost sharing (co-payments, Third Party Liability (TPL), coinsurance, etc.)	X	X	Numeric (with decimal)	Ensure the field is not truncated or rounded and does not contain extra data. Please also ensure that all shares (Federal, State, Local) of the amount paid are included in the data.
TPL Amount Header	tpl_amt_header	TPL refers to the legal obligation of third parties, i.e., certain individuals, entities, or programs, to pay all or part of the expenditures for medical assistance furnished under a State plan. This is the total amount denoted at the claim header level paid by the third party.	X		numeric (with decimal)	Ensure the field is not truncated or rounded, and does not contain extra data

<b>Field Designation</b>	<b>Standard Field Name</b>	<b>Field Description</b>	<b>Required for FFS</b>	<b>Required for MC</b>	<b>Standard Field Format</b>	<b>Quality Review</b>
Date-of-Service (DOS) From Header	dos_from_header	Beginning date of service on the claim For managed care payments, this field is used to report the beginning date of the coverage period	X	X	varchar (mm/dd/yyyy)	Ensure beginning date of service is a valid date, is populated for all records, and is prior to the ending date of service for the claim.
DOS To Header	dos_to_header	End date of service on the claim For managed care payments, this field is used to report the end date of the coverage period	X	X	varchar (mm/dd/yyyy)	Ensure end date of service is a valid date, is populated for all records and is after the beginning date of service for the claim.
Beneficiary ID	beneficiary_id	Beneficiary ID number Can be Medicaid ID or system-specific ID	X	X	varchar	This number must match a Beneficiary ID in the Beneficiary File
Billing Provider Number	billing_prov_id	Billing provider ID number Can be National Provider ID (NPI) or legacy provider ID	X	X	varchar	This number must match a Provider NPI number or Provider number in the Provider File.  If this number does not provide a unique match to correct provider information for the claim in the provider file, please provide additional variables or logic to select correct provider information (i.e., provider location id, etc.)

<b>Field Designation</b>	<b>Standard Field Name</b>	<b>Field Description</b>	<b>Required for FFS</b>	<b>Required for MC</b>	<b>Standard Field Format</b>	<b>Quality Review</b>
Billing Provider Location ID	Billing_prov_loc_id	Billing provider location ID	X		varchar	This must match the Provider Location ID in the provider file.  Required if the billing prov id is not unique to the location of the provider (e.g., if provider ID = NPI)
Referring Provider Number	ref_prov_id	Referring provider number Can be NPI or legacy provider ID	X		varchar	Must be submitted for records billed at the claim line and header level, when available.  If this number does not provide a unique match to correct provider information for the claim in the provider file, please provide additional variables or logic to select correct provider information (i.e., provider location id, etc.)
Prescribing Provider Number	prescribe_prov_id	Prescribing provider number Can be NPI or legacy provider ID	X		varchar	Must be submitted for records billed at the claim line and header level, when available.  If this number does not provide a unique match to correct provider information for the claim in the provider file, please provide additional variables or logic to select correct provider information (i.e., provider location id, etc.)
International Classification of Diseases (ICD) Procedure Code 1	icd_proc_code_1	ICD-9/10 surgical procedure code 1	X		varchar	

<b>Field Designation</b>	<b>Standard Field Name</b>	<b>Field Description</b>	<b>Required for FFS</b>	<b>Required for MC</b>	<b>Standard Field Format</b>	<b>Quality Review</b>
ICD Procedure Code 2	icd_proc_code_2	ICD-9/10 surgical procedure code 2	X		varchar	
ICD Procedure Code 3	icd_proc_code_3	ICD-9/10 surgical procedure code 3	X		varchar	
ICD Procedure Code 4	icd_proc_code_4	ICD-9/10 surgical procedure code 4	X		varchar	
ICD Procedure Code 5	icd_proc_code_5	ICD-9/10 surgical procedure code 5	X		varchar	
ICD Procedure Code 6	icd_proc_code_6	ICD-9/10 surgical procedure code 6	X		varchar	
Diagnosis 1	diag_code_1	Diagnosis code 1 (primary)	X		varchar	
Diagnosis 2	diag_code_2	Diagnosis code 2	X		varchar	
Diagnosis 3	diag_code_3	Diagnosis code 3	X		varchar	
Diagnosis 4	diag_code_4	Diagnosis code 4	X		varchar	
Diagnosis 5	diag_code_5	Diagnosis code 5	X		varchar	
Diagnosis 6	diag_code_6	Diagnosis code 6	X		varchar	
Diagnosis 7	diag_code_7	Diagnosis code 7	X		varchar	
Diagnosis 8	diag_code_8	Diagnosis code 8	X		varchar	
Diagnosis 9	diag_code_9	Diagnosis code 9	X		varchar	
Diagnosis Related Group (DRG)	drg_code	DRG code, if applicable	X		varchar	
Line Item Number	line_item_num	Number denoting individual claim detail/line item	X		numeric (no decimals)	

<b>Field Designation</b>	<b>Standard Field Name</b>	<b>Field Description</b>	<b>Required for FFS</b>	<b>Required for MC</b>	<b>Standard Field Format</b>	<b>Quality Review</b>
Line Item Number Former	line_item_num_former	For adjustment claims, number to identify the transaction line number for the claim that the current claim is adjusting	X		numeric (no decimals)	
Date Paid Line	date_of_payment_line	The date a payment line was originally adjudicated or paid	X		varchar (mm/dd/yyyy)	For most claims and payments, this value is the same as Date Paid Header
Medicare Crossover Indicator Line	mcare_xover_ind_line	Line-level indicator that a claim is a crossover claim from Medicare to Medicaid	X		varchar	“Y” = Crossover “N” = Not a Crossover Ensure all values are coded as “Y” or “N” and the field is populated for all records
Payment Status Line	payment_status_line	Paid or denied indicator for a claim line as it was originally adjudicated; should not reflect an adjusted payment status	X		varchar	State-specific values
Total Computable Amount Paid Line	amt_paid_line	Total computable amount paid at the claim line. Total Computable Amount= Federal Share + State Share + Any local share  Amount paid should be net of all beneficiary and third party cost sharing (co-payments, TPL, coinsurance, etc.)	X		Numeric (with decimals)	Ensure the field is not truncated or rounded and does not contain extra data. Please also ensure that all shares (Federal, State, Local) of the amount paid are included in the data.

<b>Field Designation</b>	<b>Standard Field Name</b>	<b>Field Description</b>	<b>Required for FFS</b>	<b>Required for MC</b>	<b>Standard Field Format</b>	<b>Quality Review</b>
Units Paid	units_of_svc_paid	Number of units (services) paid	X		numeric	<p>In cases where there are fractional units paid, ensure that they are valid and reflect the accurate number of units paid for the corresponding claim</p> <p>All paid drug records must have valid units paid greater than 0</p> <p>If the number of units paid for pharmacy claims are not available, please include quantity dispensed or other relevant information</p>
Third Party Liability (TPL) Amount Line	tpl_amt_line	TPL refers to the legal obligation of third parties, i.e., certain individuals, entities, or programs, to pay all or part of the expenditures for medical assistance furnished under a State plan. This is the total amount denoted at the claim detail level paid by the third party.	X		numeric (with decimals)	<p>Ensure the field is not truncated, rounded, and does not contain extra data</p>

<b>Field Designation</b>	<b>Standard Field Name</b>	<b>Field Description</b>	<b>Required for FFS</b>	<b>Required for MC</b>	<b>Standard Field Format</b>	<b>Quality Review</b>
Procedure Code Line	proc_code_line	Procedure code on the line (Healthcare Common Procedure Coding System (HCPCS), Current Procedural Terminology (CPT), or proprietary code) as it was adjudicated  If proprietary codes are used, State must indicate as such and provide necessary decode information.	X		varchar	
Procedure Modifier 1	proc_mod_1	Procedure Code Modifier-1 on the lines as it was adjudicated	X		varchar	
Procedure Modifier 2	proc_mod_2	Procedure Code Modifier – 2 on the line as it was adjudicated	X		varchar	
Procedure Modifier 3	proc_mod_3	Procedure Code Modifier – 3 on the line as it was adjudicated	X		varchar	
Procedure Modifier 4	proc_mod_4	Procedure Code Modifier – 4 on the line as it was adjudicated	X		varchar	
Revenue Code	rev_code	Revenue code for the claim line. Note that ALL revenue codes should be submitted for a claim  A separate record should be created for each revenue code	X		varchar	

<b>Field Designation</b>	<b>Standard Field Name</b>	<b>Field Description</b>	<b>Required for FFS</b>	<b>Required for MC</b>	<b>Standard Field Format</b>	<b>Quality Review</b>
Performing Provider Number	perf_prov_id	Performing (servicing/ rendering) provider ID number Can be NPI or legacy provider ID	X		varchar	This number must match a Provider NPI number or Provider Number in the Provider File.  If this number does not provide a unique match to correct provider information for the claim in the provider file, please provide additional variables or logic to select correct provider information (i.e., provider location id, etc.)
Performing Provider Location ID	perf_prov_loc_id	Performing provider location ID	X		varchar	This must match the Provider Location ID in the provider file.  Required if the performing prov id is not unique to the location of the provider (e.g., if provider ID = NPI)
Attending Provider Number	attend_prov_id	Attending provider ID number Can be NPI or legacy provider ID	X		varchar	This number must match a Provider NPI number or Provider Number in the Provider File.  If this number does not provide a unique match to correct provider information for the claim in the provider file, please provide additional variables or logic to select correct provider information (i.e., provider location id, etc.)

<b>Field Designation</b>	<b>Standard Field Name</b>	<b>Field Description</b>	<b>Required for FFS</b>	<b>Required for MC</b>	<b>Standard Field Format</b>	<b>Quality Review</b>
Attending Provider Location ID	attend_prov_loc_id	Attending provider location ID	X		varchar	This must match the Provider Location ID in the provider file.  Required if the attending prov id is not unique to the location of the provider (e.g., if provider ID = NPI)
Date-of-Service From Line	dos_from_line	Beginning date of service on the line Should be included for each line of a claim	X		varchar (mm/dd/yyyy)	Ensure beginning date of service is a valid date, is populated for all line level claims, and is prior to the ending date of service for the line claims
Date-of-Service To Line	dos_to_line	End date of service on the line Should be included for each line of a claim	X		Varchar (mm/dd/yyyy)	Ensure end date of service is a valid date, is populated for all line level claims and is after the beginning date of service for line claims
Place of Service	place_of_svc	Place of service	X		varchar	State-specific values
Type of Service	type_of_svc	Type of service	X		varchar	State-specific values
National Drug Code (NDC)	ndc_code	Made up of labeler(mfr) + product + pkg size configurations	X		varchar	Must be 11 digits including leading and trailing zeroes  Ensure this field is populated for ALL pharmacy claims
Drug Order Date	drug_order_dt	Date drug was prescribed for the pharmacy claim	X		varchar (mm/dd/yyyy)	Ensure this field is populated for ALL pharmacy claims
Prescription Number	rx_num	Prescription number for the pharmacy claim	X		varchar	Ensure this field is populated for ALL pharmacy claims
Prior Authorization Number	prior_auth_num	Prior authorization number	X		varchar	State-specific values

<b>Field Designation</b>	<b>Standard Field Name</b>	<b>Field Description</b>	<b>Required for FFS</b>	<b>Required for MC</b>	<b>Standard Field Format</b>	<b>Quality Review</b>
Managed Care Program Indicator	program_indicator	Name of the program (Temporary Assistance to Needy Families [TANF], Program of All-Inclusive Care for the Elderly [PACE], Long Term Care [LTC], Behavioral health)		X	varchar	State-specific values
Payment Type	payment_type	Type of managed care payment (e.g., monthly capitation, delivery kick payment or other beneficiary-specific supplemental payment, individual reinsurance payment)		X	varchar	State-specific values
Beneficiary Rate Indicator	beneficiary_rate_indicator	Rate cell or rate group used to determine the payment for the beneficiary to the managed care plan		X	varchar	State-specific values. Please provide data dictionary
Beneficiary Aid Category	beneficiary_aid_category	Aid code used to identify beneficiary's rate cell and what payment is made to Managed Care Organization ([MCO] not the same as eligibility type/group)	X	X	varchar	State-specific values. Please provide data dictionary

<b>Field Designation</b>	<b>Standard Field Name</b>	<b>Field Description</b>	<b>Required for FFS</b>	<b>Required for MC</b>	<b>Standard Field Format</b>	<b>Quality Review</b>
ICD Version	ICD_version	If the state will be submitting details with a mix of ICD-9 and ICD-10 codes, populate field with a value of either "9" or "10" to indicate the version number.  If all diagnosis codes are the same version, states are not required to populate this field but should notify Lewin which ICD version is being used.	X		numeric	Required for all fields where diagnosis codes are populated. "9" ICD-9 "10" ICD-10
Billed Units of Service	billed_units	Used to indicate Units of Service billed if that number is different from the value in the Units Paid field	X		numeric	Required if billed units are different from paid units.  In cases where there are fractional units paid, ensure that they are valid and reflect the accurate number of units billed for the corresponding claim

<b>Field Designation</b>	<b>Standard Field Name</b>	<b>Field Description</b>	<b>Required for FFS</b>	<b>Required for MC</b>	<b>Standard Field Format</b>	<b>Quality Review</b>
Bill Type	bill_type	Also referred to as type of bill. A three-digit numeric code which identifies the specific type of bill (inpatient, outpatient, adjustments, voids, etc.). The first digit represents Type of Facility, the second digit the Bill Classification, and the third digit the Frequency, which for Statewide Planning and Research Cooperative System (SPARCS) purposes is the transaction type. This field may also be 4 digits, starting with a preceding zero.	X		varchar	Required for institutional claims, if available. State specific values.

<b>Field Designation</b>	<b>Standard Field Name</b>	<b>Field Description</b>	<b>Required for FFS</b>	<b>Required for MC</b>	<b>Standard Field Format</b>	<b>Quality Review</b>
Billed Procedure Code	billed_proc_code	<p>Billed procedure code on the line (HCPCS, CPT, or proprietary code) as it was adjudicated.</p> <p>If proprietary codes are used, State must indicate as such and provide necessary decode information.</p> <p>Populate if different than procedure code line on adjudicated version of claim. This may occur automatically in certain state systems where if a certain code is billed, the system automatically changes it to another code (e.g., updated correct code or state proprietary code) to pay.</p>	X		varchar	Required if billed procedure code different from proc_code_line variable.

<b>Field Designation</b>	<b>Standard Field Name</b>	<b>Field Description</b>	<b>Required for FFS</b>	<b>Required for MC</b>	<b>Standard Field Format</b>	<b>Quality Review</b>
Billed Revenue Code	billed_rev_code	Billed revenue code for the claim line. Note that ALL revenue codes should be submitted for a claim. A separate record should be created for each revenue code. Populate if different from revenue code on adjudicated version of claim. This may occur automatically in certain state systems where if a certain code is billed, the system automatically changes it to another code (e.g., updated correct code or state proprietary code) to pay.	X		varchar	Required if different from rev_code.
Billed Amount	billed_amt	Original billed amount on claim from provider. This amount should be net of all beneficiary and third party cost sharing (co-payments, TPL, coinsurance, etc.) Populate if different from adjudicated paid amount on claim.	X		Numeric (with decimal)	Required if amount differs from paid amount on claim.  Ensure the field is not truncated or rounded, and does not contain extra data
Federal Claim Category	federal_claim_category	MSIS Code, CMS 64 line, or other state mapping into a federal claim category	X		varchar	Required, if available. State data dictionary required.

<b>Field Designation</b>	<b>Standard Field Name</b>	<b>Field Description</b>	<b>Required for FFS</b>	<b>Required for MC</b>	<b>Standard Field Format</b>	<b>Quality Review</b>
Beneficiary Eligibility Category	beneficiary_elig_cat	The specific benefit the beneficiary qualifies for that is used in adjudication of payment of the claim. This should come from the adjudication system.	X	X	varchar	Provide a data dictionary.
Enhanced Ambulatory Patient Grouper Rate (EAPG) Code	EAPG_rate_code	EAPG or APG rate code used by state to bundle outpatient services for payment.	X		varchar	Populate for outpatient services using this rate code for payment processing.
Beneficiary Type	beneficiary_type	For labor and delivery payments, this indicates if the beneficiary information given on the claim belongs to the mother or the baby.	X	X	varchar *M = Mother *B = Baby *N = Not applicable	Required for labor and delivery payments in FFS and KICK payments in managed care.
Capitation Reason Code	Cap_Reason_Code	A code for the reason the capitation record was generated, such as for a payment or a refund (e.g., PN – Payment Normal, PR – Payment Retro, RA – Rate Adjustment)		X	varchar	Provide a data dictionary
Federal Medical Assistance Percentage (FMAP) Rate	fmap_rate	FMAP (or Enhanced FMAP) applicable to the specific payment based on member eligibility, date, and service category.			numeric (with decimals)	Optional If submitted, please ensure this field is not all the same value. It should vary based on Medicaid, CHIP, Date, or Service Type.

<b>Field Designation</b>	<b>Standard Field Name</b>	<b>Field Description</b>	<b>Required for FFS</b>	<b>Required for MC</b>	<b>Standard Field Format</b>	<b>Quality Review</b>
User Field 1		User- specific field that may contain unique state data that is important for the program but is not in the standard format State may exclude this field, if desired				Optional If state specific values are used, decodes must be provided in data dictionary.
User Field 2		Same as above				
User Field 3		Same as above				
User Field 4		Same as above				
User Field 5		Same as above				
User Field 6		Same as above				
User Field 7		Same as above				
User Field 8		Same as above				
User Field 9		Same as above				
User Field 10		Same as above				

## Appendix B: Beneficiary Fields for PERM+ Data Submissions

Field Designation	Standard Field Name	Field Description	Standard Field Format	Quality Review
Beneficiary ID	beneficiary_id	Beneficiary ID number Can be Medicaid ID or system-specific ID	varchar	
Beneficiary Name	beneficiary_name	Beneficiary Name States may submit beneficiary name according to state preference (e.g., can submit multiple fields for first, middle, and last name or a single field containing beneficiary full name in the format last name, first name middle initial)	varchar	
Beneficiary Date of Birth	beneficiary_dob	Beneficiary date of birth	varchar (mm/dd/yyyy)	Ensure year of birth is not future date or extreme date in the past (example: 1800s)
Beneficiary Gender	beneficiary_gender	Beneficiary gender code	varchar	Ensure all values are coded as "M", "F", or "U" and the field is populated for all records.
Beneficiary County	beneficiary_county	Beneficiary county	varchar	State-specific values. Please note if these are FIPS county codes.
Service Area Indicator	service_area_ind	Indicator for the geographic service area if the service area is not the county	varchar	State-specific values
Beneficiary Date of Death	beneficiary_date_of_death	Date of death of beneficiary	varchar (mm/dd/yyyy)	

<b>Field Designation</b>	<b>Standard Field Name</b>	<b>Field Description</b>	<b>Standard Field Format</b>	<b>Quality Review</b>
Express Lane Eligibility (ELE) Indicator	ele_ind	Indicator for beneficiaries with ELE	Varchar	"Y" or "N"
User Field 1		User- specific field that may contain unique state data that is important for the program but is not in the standard format State may exclude this field, if desired		
User Field 2		Same as above		
User Field 3		Same as above		
User Field 4		Same as above		
User Field 5		Same as above		

**Appendix C: Provider Fields for PERM+ Data Submission**

Medical Record Contact provider information are listed in separate fields. All other providers – billing, performing/rendering/servicing, attending, prescribing, referring provider information should all be listed in the provider fields. Note: institutional claims require that the performing provider fields be populated by the attending provider information. For example, if on an institutional claim, the attending provider ID is P8756276, the provider ID in the provider file will be set to P8756276 and the attending provider number will be set to P8756276 in the claims file. Thus, resulting in a one-to-one match between the provider file and the claims file.

<b>Field Designation</b>	<b>Standard Field Name</b>	<b>Field Description</b>	<b>Standard Field Format</b>	<b>Quality Review</b>
Medical Record Contact Name	mr_contact_name	Medical record contact name	varchar	Ensure this field is populated when available Do not report this field if values are the same as data in the corresponding fields for billing, performing, or referring providers
Medical Record Contact Address 1	mr_contact_addr_1	Medical record contact address first line	varchar	Ensure this field is populated when available Do not report this field if values are the same as data in the corresponding fields for billing or performing providers
Medical Record Contact Address 2	mr_contact_addr_2	Medical record contact address second line	varchar	Ensure this field is populated when available Do not report this field if values are the same as data in the corresponding fields for billing or performing providers
Medical Record Contact City	mr_contact_city	Medical record contact city	varchar	Ensure this field is populated when available Do not report this field if values are the same as data in the corresponding fields for billing or performing providers
Medical Record Contact State	mr_contact_state	Medical record contact state: 2-character postal abbreviation.	varchar	Ensure this field is populated when available Do not report this field if values are the same as data in the corresponding fields for billing or performing providers Use the abbreviated 2-letter code for each state (e.g., WA for Washington state)

Field Designation	Standard Field Name	Field Description	Standard Field Format	Quality Review
Medical Record Contact Zip	mr_contact_zip_code	Medical record contact zip code. Should contain either 5 or 9 digits (ZIP+4 digit code)	varchar	Ensure this field is populated when available Do not report this field if values are the same as data in the corresponding fields for billing or performing providers If possible do not include hyphens when using a ZIP+4 digit code
Medical Record Contact Phone	mr_contact_phone	Medical record contact phone number. All phone numbers should be 10 digits, including the area code	varchar	Ensure this field is populated when available Do not report this field if values are the same as data in the corresponding fields for billing or performing providers
Provider Number	prov_id	Provider ID Can be NPI or legacy provider ID	varchar	State-specific values Ensure this is a unique identifier match to billing/performing/referring id in claims layout. This ID should guarantee a one-to-one match. If it does not, please include other variables (i.e., provider location ID) or logic to achieve one-to-one match.
Provider Name	prov_name	Provider name	varchar	
Provider Type	prov_type	Provider type	varchar	State-specific values Provide a data dictionary
Provider Specialty	prov_spec	Provider specialty code	varchar	State-specific values Provide a data dictionary
Provider Address 1	prov_addr_1	Provider address first line	varchar	
Provider Address 2	prov_addr_2	Provider address second line	varchar	
Provider City	prov_city	Provider city	varchar	

<b>Field Designation</b>	<b>Standard Field Name</b>	<b>Field Description</b>	<b>Standard Field Format</b>	<b>Quality Review</b>
Provider State	prov_state	Provider state	varchar	Use the abbreviated 2-letter code for each state (e.g., WA for Washington state)
Provider Zip	prov_zip_code	Provider zip code Should contain either 5 or 9 digits (ZIP+4 digit code)	varchar	If possible do not include hyphens when using a ZIP+4 digit code
Provider Phone	prov_phone	Provider phone number(s) All phone numbers should be 10 digits, including the area code	varchar	If possible, do not include hyphens or parentheses
Provider Fax	prov_fax	Provider fax number, when available All fax numbers should be 10 digits, including the area code	varchar	If possible, do not include hyphens or parentheses
Provider NPI	prov_npi	Provider NPI, if available	varchar	If certain atypical providers do not have NPIs, please note to SC.
Provider Location ID	prov_loc_id	State specific code that differentiates different addresses for the same provider	varchar	Required if provider ID is not unique per each provider location
User Field 1		User- specific field that may contain unique state data that is important for the program but is not in the standard format		
User Field 2		Same as above		
User Field 3		Same as above		
User Field 4		Same as above		
User Field 5		Same as above		

## Appendix D: PERM+ Transmission Cover Sheets

These forms will also be provided to the state in MS Excel (".xlsx" file format).

Transmission Cover Sheet									
PERM Plus - Claims File									
<b>State:</b>									
<b>Date:</b>									
<b>Quarter:</b>									
<b>Data Descriptions:</b> Complete the information below for each submitted file. If submitting data documentation, please include a row describing the documentation. Add more rows as necessary.									
<b>Data Description</b> (e.g., Q1 Claims Header File; data documentation)						<b>File Format</b> (e.g., text, Excel, SAS)	<b>File Media</b> (e.g., CD, DVD, FTP)	<b>Password Protected? (Y/N)</b> (if yes, send password separately)	
<b>Data Filename</b>									
(Add rows if necessary)									
<b>Control Totals:</b> If submitting more than two data files, copy and paste additional control totals tables.									
<b>NOTE:</b> List the total # of records and total dollars by STATE CLAIM TYPE, not universe totals. Add more rows as necessary to reflect each state claim type.									
<b>Data Filename:</b>									
State Claim Type	Month October		State Claim Type	Month November		State Claim Type	Month December		
	Total # of Records	Total Dollars		Total # of Records	Total Dollars		Total # of Records	Total Dollars	
(Add rows if necessary)									
<b>Data Filename:</b>									
State Claim Type	Month October		State Claim Type	Month November		State Claim Type	Month December		
	Total # of Records	Total Dollars		Total # of Records	Total Dollars		Total # of Records	Total Dollars	
(Add rows if necessary)									

Transmission Cover Sheet					
PERM Plus - Beneficiary File					
<b>State:</b>					
<b>Date:</b>					
<b>Quarter:</b>					
<b>Data Descriptions and Control Totals:</b> Complete the information below for each submitted file. If submitting data documentation, please include a row describing the documentation. Add more rows as necessary. For files containing data, please include the total # of records.					
Data Description (e.g., Q1 Recipient File; data documentation)	Data Filename	File Format (e.g., text, Excel, SAS)	File Media (e.g., CD, DVD, FTP)	Total # of Records	Password Protected? (Y/N) (if yes, send password separately)
(Add rows if necessary)					

Transmission Cover Sheet					
PERM Plus - Provider File					
<b>State:</b>					
<b>Date:</b>					
<b>Quarter:</b>					
<b>Data Descriptions and Control Totals:</b> Complete the information below for each submitted file. If submitting data documentation, please include a row describing the documentation. Add more rows as necessary. For files containing data, please include the total # of records.					
Data Description (e.g., Q1 Provider File; data documentation)	Data Filename	File Format (e.g., text, Excel, SAS)	File Media (e.g., CD, DVD, FTP)	Total # of Records	Password Protected? (Y/N) (if yes, send password separately)
(Add rows if necessary)					