Program Memorandum Carriers

Department of Health and Human Services (DHHS)
HEALTH CARE FINANCING ADMINISTRATION (HCFA)

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CHANGE REQUEST 1450

SUBJECT: Initial VIPS Medicare System (VMS) Changes Necessary to Allow for "Full" Program Safeguard Contractor (PSC) Implementation

This Program Memorandum (PM) concerns implementation of "security" and "segregation of ownership" changes within the VMS in order to accommodate full PSC implementation. Section 1 of the "umbrella" PSC Statement of Work (SOW) defines "a full PSC" as "…one that performs all of the fundamental activities contained in Section 3, General Requirements, under a Task Order." The system changes for security (Attachment 1) are to be implemented with the July 1 release. Final decisions have not yet been made regarding the implementation date(s) for the remaining work and discussions between all the parties are continuing. If there are further changes to be scheduled for July, then a follow up PM will be released by February 16 to specify those changes. In addition, follow up PMs will be issued to schedule the remaining changes for future releases.

BACKGROUND

The Medicare Integrity Program (MIP) provisions of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) allow HCFA to contract with entities other than Medicare carriers and Fiscal Intermediaries (FI) to perform specific program safeguard functions. Under this authority, HCFA has awarded contracts to 12 prime PSCs. The umbrella PSC SOW, under which all PSC task orders are issued, contains various workload reporting and systems requirements that PSCs must adhere to. These requirements involve the Medicare carrier and FI standard claims processing systems as well as systems such as the Common Working File, the Contractor Reporting of Operational and Workload Data System, and the Contractor Administrative Budget and Financial Management System. PM AB-00-79, dated August 25, 2000, and effective September 1, 2000, established a specific series of contractor numbers for use by PSCs. Although these numbers were initially added for HCFA internal reports only, PM AB-00-79 also noted that PSC standard systems requirements would be addressed in a separate Change Request. This PM is intended to address those requirements as they relate to the VMS, and to allow PSCs to use the numbers established in PM AB-00-79 to perform MIP activities within the VMS.

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

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

As previously noted, the modifications required to allow for full PSC implementation within the VMS will be phased in via several system releases. Since the most critical changes identified by CSC are related to security and segregation of ownership, this PM addresses only these two areas. The requirements documentation for the VMS security modifications is contained in Attachment 1. Attachment 2 contains the required segregation of ownership modifications.

The VMS modifications were developed and documented with the following overall assumptions. Any assumptions that relate only to a specific limitation are included in the detail for that limitation:

- The PSC will access the standard system via the AC's production environment (the PSC may be co-located with the AC or in a remote facility).
- The PSC will work with a single AC for at least the initial implementation.
- The PSC will be defined as a separate department within the system.
- The PSC will test in the AC test environments during normal release testing windows and will follow established release testing guidelines.
- Any electronic transactions implemented by the PSC will follow ANSI standards (as required to support HIPAA legislation).
- The current VMS action code processing will sufficiently meet the PSC Denial Reason requirements.
- An internal PSC process will cover the Internal Quality Assurance (IQA) requirements.
- DMERC appeals process for claims determination is the same as the Part B appeals process.

The *effective date* for this PM is July 1, 2001.

The *implementation date* for this PM is July 1, 2001.

These instructions should be implemented within your current operating budget.

This PM may be discarded after February 14, 2002.

If you have questions, contact Phil Kauzlarich at (410) 786-7170.

VMS REQUIREMENTS DOCUMENTATION - Security Limitation

Description of Limitation/Solutions:

Medicare claims processing requirements have not previously necessitated the ability to assign security down to the field or department level or to limit operator authority (e.g., allowing an operator to access a function for one department's data but not for another department's data). VMS currently handles security at the function level only.

In order to resolve this limitation, the standard systems will be modified to assign security on a department level to allow for restricting operator authorization down to the field level as necessary. This will allow access to the functions, fields, and data within VMS to be restricted to the appropriate operators based on their department authority levels. Additionally, security audit trails will be maintained, which will capture each update of the security file as well as any attempted activity by an operator that is contrary to his or her authorization level (potential "breach of security" issues).

Security Assumptions:

The following assumptions were made in determining what changes are required to the VMS system to resolve the existing limitations in the category of security. If any of these assumptions are determined to be incorrect, some or all of the changes specific to security limitations may need to be revisited:

1. Decisions will be made jointly by the PSC and AC during the detailed design phase to determine which standard system functions fall within each "department" (some functions will fall across multiple departments).
2. Decisions will be made during the detailed design phase to determine any fields within subsystems that need to be identified as AC or PSC-exclusive.
3. There will be one corporate security officer (AC) to oversee all departments.
4. Each department will have an individual Security officer responsible for maintaining the security levels for that department.
5. Security for any third party software that potentially changes data must be tied into the standard system's internal security, so updating of departmental data can be controlled and limited by the appropriate department security officer.

System Changes:

The following represent the minimum changes required to resolve the security limitations identified by CSC:

1. **VIPS will re-engineer the current security architecture within VMS to support a multi-level structure.** This re-engineering will use a **hierarchical structure with three tiers of security**. This type of structure allows for appropriate functional level control and flexibility in assigning authority levels. Modifications will be required throughout the entire system to incorporate this new architecture.

   The top tier in the structure represents the "corporate security officer". The corporate security officer is the highest-level security administrator and is responsible for assigning appropriate authority levels to the departmental security officers as well as establishing all new operator IDs. The corporate security officer would likely be an employee of the AC. This structure allows for one corporate security officer.

   The departmental security officers are responsible for assigning the appropriate authorization levels for their own departmental functions to each operator needing to access specific functions and/or data. For example, the PSC department security officer is responsible for granting access to any/all PSC owned functions within the standard system to all operators (regardless of the operator's department). For example, if an AC operator requires access to any of the PSC functions within the system, only the PSC department security officer can grant the necessary

authority to that operator. It is envisioned that the initial set-up will utilize four (4) departments – one for the AC, two for the PSC (in order to accommodate the uniqueness of Fraud and Abuse), and one for the system maintainer. While the system maintainer will not "own" functions within the system pertaining to claims/payment, they will have oversight of some critical edits that, once they are installed, should not be able to be readily turned off by the contractors.

The third tier of the structure represents the actual functions within the system. As noted in the assumptions, the PSC and AC will need to jointly determine which functions are "owned" by either entity. That department will become the controller of that function (or field) within the system. There may be functions that are jointly owned, in which case, an operator may have different security clearance for different data fields depending on the owner's restrictions. For example, if an AC operator has full authority in the correspondence system under the AC, but has no authority for the correspondence system under the PSC, that operator can enter the correspondence system and can access the AC cases, but cannot access the PSC's cases.

2. **An Ownership Definition Table will be created, which will indicate the owner of each subsystem and/or field within a subsystem where field ownership is applicable.** The operator security file will read this table to determine the department ownership for each function. This information will be used within the security system when operator authority levels are being assigned/updated. This table will also be used to determine how to populate the ownership field when new data is entered into the system. While the PSC will be able to view the table, the corporate security officer will have sole control over maintenance for this table.

3. **Inquiry only access will be established as required.** In the current environment, some VMS subsystems have no provision for inquiry only access. Currently, if an operator has authority for suspended claims, he has complete authority – i.e., he can get to the suspended claims, and he can update suspended claims. With the addition of the PSC, it is conceivable that an operator may need to have access to a suspended claim, but may not be authorized to work the claims.

4. **Default security switch settings will be established for specific groups to aid in setting up new operators within that group.** For example, if all customer service representatives (CSRs) have the same basic authority levels throughout the system, those security settings will be defined as their default. Each new CSR operator added would be assigned the default settings. The appropriate security officer can apply any necessary additions and changes to the defaults.

5. **Standardized authority level values will be adopted for all functions throughout the system.** Currently, each subsystem's security flag has values assigned which are potentially unique to that subsystem. During the re-engineering of the security system, the current values will be converted to a standard set of values, which will be used for the security levels for all system functions.

6. **Security audit records will be created to capture two types of data:** All additions and changes to operator security, including the date of the activity and the security officer who added or changed the record (this functionality is currently handled by SAFE). SAFE will be upgraded as needed to allow for the addition of the PSC.

   Any attempts at unauthorized activities. For example, if an operator is not authorized to access PSC correspondence cases, but attempts to access a PSC correspondence case, an audit record will be written to capture this activity.

ATTACHMENT 2

VMS REQUIREMENTS DOCUMENTATION – Segregation of Ownership Limitation

Description of Limitation/Solutions:

Since Medicare claims processing requirements have not previously necessitated this functionality, VMS does not currently have the ability to segregate ownership to a field level within any of the subsystems for the purposes of establishing authority and access levels.

In order to resolve this limitation, the standard systems will identify specific applications and/or fields within subsystems as being owned by a specific contractor (either the AC or PSC). Such ownership will provide the contractor with control over the security and maintenance of those subsystems and/or fields.

Segregation of ownership will allow the PSC and AC to clearly mark a function or data as being owned by one entity or the other (either by specific ownership tag or by location and status in the case of claims). The ownership will also tie into the security system and will appropriately limit or deny access to an operator without full access authority as established within the security system.

Segregation of Ownership Assumptions:

The following assumptions were made in determining what changes are required to the VMS system to resolve the existing limitations regarding segregation of ownership. If any of these assumptions is determined to be incorrect, some or all of the changes specific to Segregation of Ownership limitations may need to be revisited:

1. The PSC contractor number will be used for HCFA required reporting purposes only, not within the system for claims or certificate of medical necessity (CMN) processing (which will continue to use the AC contractor number).
2. The program integrity management reporting system (PIMR) reports contain all of the required PI related activity information required by HCFA. No further workload reporting is required by HCFA specific to the PSC.
3. The PSC requires the ability to adjust claims and CMNs.
4. The AC is responsible for all financial activities. Therefore, even though an ownership field is being added to the accounting subsystems, the AC will be the default owner on all of the accounting functions (accounts receivables, miscellaneous checks, check log, and check history).
5. If a provider is taken off alert, it is appropriate to generate all funds previously held due to that alert status. (If there was an issue with the provider, the alert would not have been removed.)
6. During the detailed design phase, the AC and PSC will jointly agree to common values to be used for any fields throughout the system that are to be owned by either entity as well as which values are to be owned by a specific entity (e.g., correspondence status, and type; location and statuses in claims; etc).
7. During the detailed design phase, the AC and PSC will jointly determine ownership of the existing data in cases where specific ownership will exist. (For example, existing edits, Entity Action Records, and suspense letters) An initialization process will load the correct owner value to the ownership field on these records. All new records will be tagged as they are added. The adding entity is the owner on the record by default.

System Changes:

In assessing the limitations associated with segregation of ownership within VMS, each subsystem had to be considered separately. Once it was determined which subsystems were impacted by this limitation, each was separately analyzed to determine what changes are needed within that specific subsystem. Therefore, after system-wide changes are described below, the changes listed for segregation of ownership are divided by subsystem. Each grouping describes the minimum changes required within that specific subsystem to resolve the issues associated with segregation of ownership. The upcoming HIPAA requirements were considered in the analysis and the solutions.

1. System-Wide Changes to Resolve Segregation of Ownership Limitations

These system-wide changes are being applied to many subsystems throughout VMS for the resolution of segregation of ownership limitations. In some cases, these are the only changes required within a particular subsystem. If there are changes other than the system-wide changes required within a subsystem, the subsystem is listed in Section 2 with any additional changes required. Any changes required for unmentioned subsystems (e.g., AFN's, RULES, EARS, VMON/S, APPL 1 Alerts) will be addressed during the detailed design phase.

- A new, **updateable ownership field** will be added to the records throughout the system that may be owned by either entity (edits, action codes, correspondence cases, entity action records, suspense letters, etc.). This will be a 4-position field with values to be determined by the specific departments. This field will identify the record as being owned by a specific department and will be used in conjunction with the operator ID to determine authority levels for accessing/updating the record. The ownership field is also used for transferring ownership. The ability to transfer a record is limited to the current owner *giving ownership away;* another entity is not able to take the ownership. (For example, if an AC owns a correspondence case, and determines it needs to be worked by a PSC operator, only the AC can change the ownership field to indicate PSC).

New Ownership Consistency Edits will ensure that department owned fields are only updateable by that department. For example, if an AC operator is adding an entry on the Error Handler Table, and attempts to update the medical review/utilization review (MRUR) indicator, they will receive an edit that indicates the MRUR indicator can only be updated by a PSC operator. Where elements on the same screen are split between the AC and the PSC, changes will need to be made to ensure that an add transaction with blank fields will not be rejected by the system (e.g., when the MPR copy functions is used by the PSC, key fields "owned" by the AC will be left blank).

The Location Field in various subsystems will be opened to allow the operator to key both the location and status in order to move a claim. Currently the operator keys only the status; the location is system- generated based on the status keyed. With the addition of a new owning entity, multiple locations will need to be available per status. (e.g., if the status keyed indicates "received", different locations would be necessary to identify the owner since it is likely that both the PSC and the AC would have a status of "received").

- **Link Ownership of Notes to associated records** throughout the system. The notepad system allows notes to be added to records throughout the system to be used for claims processing, correspondence resolution, etc. Changes will be made to carry the ownership value from the primary record to its associated notes. (e.g., if a note is attached to a correspondence case owned by the AC, the AC also owns the note. If the AC transfers ownership of this correspondence case to the PSC, the ownership of the note will also be transferred to the PSC.)

- **Limit access to data within a list based on ownership** throughout the system. Screens that display lists of data will be modified to continue to display the entire list to all operators authorized to access the screen, but only the entries owned by the operator's department will be available to be selected. Those entries owned by another contractor will not display a selection field, indicating to the operator that they are not able to select and work with the entry.

2. Changes Required for Specific Subsystems

A. Area Prevailing Provider Look-Up (APPL) Changes

In addition to the system-wide changes noted above, the following changes are required in the APPL subsystem to resolve the segregation of ownership limitations:

- Currently, some fields on the provider header screen are used for multiple purposes (using different values for each purpose). In order to avoid confusion and to allow for the most values per field, any multi-purpose fields will be **split into separate individual fields.**

- The **copy function** on the master procedure record will be **modified** to ensure that only values "owned" by the requester are copied to a new record. Again, where elements on the same screen are split between the AC and the PSC, changes will need to be made to ensure that VIPS update edits react appropriately and that an add transaction with blank fields is not rejected by the system.

B. VIPS Medicare Online Claims (VMON) System Changes

In addition to the system-wide changes noted above, the following changes are required in the VMON) subsystem to resolve the segregation of ownership limitations. While the changes noted below apply to VMON/F (new claims) and VMON/A (adjusted claims), other VMON transactions will be changed as required (e.g., transactions for suspended claims).

- **Restrict the display/resolution of edits to the owning entity**. The claims system will access VMAP Error Table to read the values in the ownership field and the ownership override indicator to determine whether to display the edit (based on the operator ID).
- The **logic for edits** will be changed to allow edits to be handled in department order. The AC edits will be handled first followed by the PSC edits. This change is being made to allow resolution of as many edits as possible before suspending the claim for MRUR/PI review.
- **Unique location and status combinations** will be used to designate ownership of claims. The PSC and AC will determine unique values during the detailed design phase, with some restrictions. Some location and status combinations currently have hard-coded logic throughout the system. A large amount of analysis will be required to identify all existing hard-coded logic to ensure no location/status combinations that already contain specific logic are assigned to either the AC or PSC and to determine all changes required to the system and the full impact of those changes.
- **Adjusted claim workflow suggestion**: It is suggested that if a PSC opens an adjustment, they must handle that adjusted claim to completion. To that end, an edit would be added to the system to limit claims suspension to the operator's own location/status. For example, a PSC operator can suspend an adjusted claim only to a PSC owned location/status. **System changes needed for any situations identified that require the PSC to suspend an adjustment to the AC (e.g., to resolve AC consistency edits), will be addressed during the detailed design phase.**

C. Correspondence (ICOR) Changes

In addition to the system-wide changes noted above, the following changes are required in the Correspondence subsystem to resolve the segregation of ownership limitations:

- ICOR will be changed to **recognize a separate library** and **separate operators** when accessing ALGS (external letter system). Establishing these separate entities will allow the PSC to control access of letters to authorized operators within this separate area.
- Changes will be applied to **include a separate purge value** for F&A letters. This will allow the PSC to establish different purge criteria for these letters so they can remain online/accessible longer, as appropriate.
- The **VMS Parameter tables** specific to the Correspondence subsystem will be **expanded** to allow new PSC values for correspondence status and type to be defined. Additionally, an owner column will be added on the appropriate tables to allow the various status and type fields to be tagged for a specific department, as needed.
- Existing **Correspondence Reports** will be changed to allow the data to be split by owner for each report. This will allow separation of the data and provide a clear picture of correspondence activities by department.

- The existing **320 Report (Hearings/Review Exception Report) will be modified**. Currently this report captures data each time the type on a correspondence case is changed. The report will be changed so that it also captures data each time the owner on a correspondence case is changed (separately from type changes).

D. DMERC Specific Changes

In addition to the system wide changes noted above, the following changes are required to DMERC specific areas within the VMS system to resolve the segregation of ownership limitations:

- **CMN Edit Table** will receive the same updates as previously mentioned (addition of ownership field and ownership indicator). Additionally, if any CMN edits not previously designated as PI-related are deemed to be PI-related by the PSC and/or AC in the future, coding changes will be required to either tag the edit or to add/populate an activity code field on the CMN edit table. (As there were only a very few edits determined to be PI related in the current DMERC environment, hard coded logic was added to include these edits as part of PIMR).

- **Add an Ownership Column to the DMERC Status Table** to specify ownership of statuses. The system will verify the ownership of a status on the DMERC status table when any edits are being defined to suspend to a specific status. The system will ensure that the status being assigned to the edit is owned by the same entity as the edit. For example, a PSC edit can not be defined to suspend to an AC owned status. **If, however, situations are identified where a PSC edit should suspend to the AC, or vice versa, system changes to accommodate those situations will be addressed during the detailed design phase.**

- **CMN processing** will be updated to secure edit resolution. While either entity (AC or PSC) will be able to add a new CMN, the resolution of edits will be limited based on the Ownership Field in conjunction with the ownership override indicator on the CMN edit table. If the edit is owned by the PSC, but the ownership override indicator is set to allow either entity to work the edit, the CMN process will not limit edit resolution. If however, the edit is owned by the AC and the ownership override indicator is NOT set to allow either entity to work the edit, any PSC operator attempt to process the CMN will not be allowed to resolve the edit.

E. VMS Accounting System – Money Online Notification and Inquiry (MONI)

In addition to the system-wide changes noted above, the following changes are required within the MONI subsystem to resolve the segregation of ownership limitations:

- **A source value will be added to all Accounts Receivable (AR)** to indicate which entity (owner) initiated the AR and "how" (adjustment, ICOR case, etc.) It is expected that this information may be needed for reporting purposes.

- ccounting reports will be modified to include the source code and to sort and total the reported data by source.

F. Parameter Table (VMAP) Changes

In addition to the system-wide changes noted above, the following changes are required within the VMAP subsystem to resolve the segregation of ownership limitations:

Alert Code Logic Table and Alert Code Rank Table will be changed as follows:

- PSC **will** use values 1-8 within the DMERC system

- Flag 7 will be used to indicate who controls the alert ("A" in first position will indicate PSC owned; "D" in first position will indicate AC owned).

- **Edits** will be added to confirm that operators use only appropriate values (1-8 for PSC; 9-Z for AC)

- Modify existing report to capture change in flag 7. If the value in flag 7 changes from an "A" to any other value, the change will be captured on the report to indicate funds will be released.

- **Open Location field on Error Handler** to allow for entry of different location/status combinations than currently exist. Currently, the location is assumed based on the status entered. With an addition of a new owning entity within the claims system, it will be necessary to have multiple locations per status.

- **Change the current Status Table to a Location/Status Table** to accommodate PSC location/status (multiple locations per status).

- **Add Aging information to the new Location/Status Table**. All information from the existing Aging table will be added to the new expanded location/status table (as aging information is tied to location/status).

- **Add an Ownership Override Indicator** on "owned" parameter records. This indicator will allow two ownership values. One value will indicate the record is updateable (and, in the case of edits, the edit is resolvable) by owning entity only; the other value will indicate that either the owning or non-owning entity has the authority to update the record and/or resolve the edit.

- **Reason/Discovery Combination table consistency editing** will be added to ensure that any reason and discovery codes used in combination are owned by the same entity. For example, if a PSC operator defines a reason/discovery combination, both the reason code and the discovery code must be owned by the PSC.

G. VMS Suspense Subsystem Changes - Automated Paperless Exceptions (APEX) and VIPS CMN Automated Exception Processing (VCAP)

In addition to the system-wide changes noted above, the following changes are required in the APEX and VCAP subsystems to resolve the segregation of ownership limitations:

- **Display of edits will be limited** to the owning department. When an operator accesses a claim to be processed within the APEX (claims) or VCAP (CMNs) suspense systems, operators will be presented with only those edits that are owned by their department. For example, an AC operator will see only AC edits (or PSC edits with the override indicator set) when working in suspense subsystems.
- As with the Claims system, **location and status combinations** will be used to designate ownership. Only operators authorized to work within the specific department (owner) location/status combinations will be able process the AC or PSC suspended claims. All operators authorized with inquiry for the subsystem will be able to view all suspended claims.

H. VMS Mass Adjustment System (MADS)

In addition to the system-wide changes noted above, the following changes are required in the MADS subsystem to resolve the segregation of ownership limitations:

- Changes will be needed within MADS to determine the **ownership of adjusted claims** (likely based on the operator defining the criteria for the Mass Adjustment process.)

- **Edits will be added for suspense location and status** assignment within the mass adjustment process to ensure that the ownership of the suspense location and status correspond to the operator defining the criteria.

I.VMS Online Quality Control (OQC) System Changes

In addition to the system-wide changes noted above, the following changes are required in the OQC subsystem to resolve the segregation of ownership limitations:

- **Determination of claims universe** to be used for pulling claims will be systematically determined based upon type of parameters and set-up operator. If the OQC event is being defined with operator parameters (e.g., claims for a specific operator), the operator specified must be within the same department as the operator defining the selection criteria. If the OQC event is defined with non-operator parameters (e.g., based on procedure code or some other selection criteria), the claims will be selected from the full claims universe (AC and PSC claims).
- **Use of location and status to determine ownership** within the OQC system. Changes are necessary to read a new location/status table to ensure that claims are being pulled correctly according to the selection criteria and set-up operator.

J. VMS Online Documentation System (OLDS) Changes

In addition to the system-wide changes noted above, the following changes are required in the OLDS subsystem to resolve the segregation of ownership limitations:

- **Read the ownership information from the other VMS subsystems** to determine who is authorized to update specific data within OLDS. For example, OLDS would read the VMAP error handler table to determine ownership when an operator attempts to update an error record within OLDS.
- **Add an ownership field to "E" (Error) records** that would not be updateable by an operator. The record's ownership information read from the "parent" subsystem will be displayed in OLDS. So, if ownership changes in VMAP, the ownership displayed in OLDS will also change.

K. VMS Automated Development System (ADST)

In addition to the system-wide changes noted above, the following changes are required in the ADST subsystem to resolve the Segregation of Ownership limitations:

- **Create an Automated Development System security table** to establish ownership of the "claim paths" used within ADS. (Claim paths define the action the claim will take on follow-up.) This security table will be used throughout ADS when letters are defined and claim paths assigned to confirm the consistency in ownership between the letter and the path.
- **Modify existing text listing** to include the ownership information for each distinct section of text.
- **Modify ADS edits on claims to confirm ownership consistency.** The ADS and Claims systems will be modified to verify ownership of a letter when an operator enters a message number on the claim. If the operator is a PSC operator, the message number entered on the claim must be owned by the PSC.)
- **Modify ADS Claim Action table (ADST/3) to edit for ownership consistency.** The ADS claim action table will be modified to check for consistency in ownership between operator, letters and claim path. If the operator is a PSC operator, the letter number must be owned by the PSC and the claim path must be owned by the PSC.

- **Modify ADS Development Status table (ADST/4) to edit for ownership consistency.** The Development **Status** table will be modified to ensure consistency of ownership between the operator, initial letter, follow-up letter and action code. If the operator is an AC operator, the AC must own the initial letter, follow-up letter, and the action code.

L. VMS Letter Writer System (LTRO)

In addition to the system-wide changes noted above, the following changes are required in the LTRO subsystem to resolve the Segregation of Ownership limitations:

- **Modify letters to edit for ownership consistency.** The Letter Writer system will be modified to edit for consistency within all parts of letter set-up. Letters are made up of many sections and LTRO will edit to confirm that all parts of a letter are owned by the same entity, based on the set-up operator's ownership.