
TABLE OF CONTENTS

RETROACTIVE PROCESSING CONTRACTOR – REED & ASSOCIATES, CPAS2

CMS GUIDANCE/REGULATIONS2

COMPLIANCE2

TYPES OF DATA TO BE CERTIFIED EACH MONTH2

1. ACCURACY OF NEW DATA3

2. ACCURACY OF CMS’ REPORTS3

HANDLING MULTIPLE CONTRACTS NUMBERS WITHIN AN ORGANIZATION3

COMPLETING THE CERTIFICATION FORM.....3

CERTIFICATION DUE DATES.....3

RPC’S MAILING ADDRESS.....4

Retroactive Processing Contractor – Reed & Associates, CPAs

Effective August 3, 2009, Reed & Associates, CPAs (Reed) was designated by CMS as the national contractor responsible for processing retroactive transactions for all Medicare Advantage Organizations, Part D Sponsors, Cost-based Plans and PACE Organizations (hereafter referred to collectively as “Organizations” in this document). Under the terms of this contract, Reed processes the Monthly Certifications (Attestations) of Enrollment and Payment Data submitted by organizations as well as validates and processes retroactive transactions. All Attestations submitted by organizations must be in accordance with the processes outlined in this Standard Operating Procedure (SOP). If Attestations are not submitted timely or accurately, they will be reported to CMS as noncompliant in the RPC’s monthly reports to CMS Central Office and each Regional Office.

CMS Guidance/Regulations

Per the contract between CMS and Medicare Advantage Organizations and Demonstration plans, PACE Organizations, and Prescription Drug Plan (PDP) sponsors, each organization must complete and submit a monthly attestation of enrollment information related to payment from CMS (refer to the regulations at 42 CFR 422.504(l)(1) and 423.505(k)(2)).

Compliance

To comply with this requirement, each organization must complete the “*Certification of Monthly Enrollment and Payment Data*” and return it to the RPC (acting on CMS’ behalf) each month as stated in the HPMS Memo, “*Certification of Monthly Enrollment and Payment Data*” issued on July 21, 2009. Organizations may not substitute a revised or different attestation. The document provided in the July 21, 2009 memo must be used.

Each Attestation must be signed by the Chief Executive Officer (CEO) or Chief Financial Officer (CFO) or an individual delegated with the authority to sign on behalf of one of these officers. Please note: A delegated individual should be a senior officer of the organization and report directly to the CEO or CFO. By signing and submitting a Monthly Certification, each organization certifies that, based on best knowledge, information, and belief, the enrollment information submitted to CMS is accurate, complete, and truthful. A signed Attestation also certifies that each Organization has reviewed and reconciled data in their systems to CMS’ reports (i.e. TRR & MMR) and has effectively identified and submitted any discrepancies to CMS or the RPC for correction in accordance with CMS procedures.

Types of Data to Be Certified Each Month

There are 2 types of data each Organization must certify monthly shown as Items 1 and 2 on the certification form.

1. Accuracy of New Data

Item 1 of the form requires the Organization to certify the accuracy of new data that the Organization has submitted to CMS for all new enrollments, reinstatements, disenrollments, PBP changes and Segment changes.

2. Accuracy of CMS' Reports

Item 2 of the form requires the Organization to certify the accuracy of CMS' reports including the Monthly Membership Detail and all Transaction Reply Reports. To comply with the requirement of Item 2, the Organization must review these reports and document any discrepancies it finds between the report and the Organization's records. Organizations will follow the existing procedures for submitting transactions for the correction of discrepancies to the Retroactive Adjustment Processing Contractor (RPC) within 45 days of the availability of the Reports. Organizations should not send transactions for retroactive adjustments with the certification form as they will not be accepted or processed.

Handling Multiple Contracts Numbers within an Organization

Organizations with multiple contracts should submit one form for all contracts combined. The Organization must indicate in the appropriate space on the form each of the contract numbers that the Organization has and for which the Organization is certifying. Certification is required every month for each contract for which the Organization will receive payment from CMS.

Completing the Certification Form

Enter the dates on the form that complete each of the 2 items (paragraphs) described above. For example, the certification due on March 10, 2012 reflects the payment reports that were available on January 25, 2012 regarding the February 2012 payment. Those reports reflect the data submitted by the Organization during the period from the prior CMS systems cut-off date through the CMS systems cut-off date that precedes the report availability date. In this example, the dates are December 8, 2011 through January 13, 2012. The CMS systems cut-off dates are also provided in the MARx Monthly Schedule.

A template has been created to assist plans in filing their Attestations accurately and timely. It can be found on Reed & Associates' website at <http://www.reedassociates.org/payvalSOPs.php>.

Certification Due Dates

The certification for each month's data is due to the RPC within 45 days of the date that the monthly reports are available with that month's data. For example the certification of data in the February 1, 2012 payment is due on March 10, 2012. This is 45 days after the monthly reports for the February payment were available which was January 25, 2012.

Certification of Monthly Enrollment and Payment Data (Attestations)

Revised: January 2012

The schedule and due dates for Organizations to submit the certification of Monthly Enrollment and Payment data is included on the MARx Monthly Schedule which is published in the Plan Communications Users Guide, Appendix C. The schedule is updated annually. The table below is a complete schedule through 2012. Plans may use this table as a guide for completing Monthly Certifications for all applicable contract numbers.

Attestation Schedule Table					
Paragraph 1		Paragraph 2			
Requests Received & Processed		Reports Received During	Payment Month	Reports Received Date	Certification Due To RPC
FROM	TO				
11/12/2011	12/7/2011	December-11	January-12	12/22/2011	2/5/2012
12/8/2011	1/13/2012	January-12	February-12	1/25/2012	3/10/2012
1/14/2012	2/10/2012	February-12	March-12	2/21/2012	4/5/2012
2/11/2012	3/16/2012	March-12	April-12	3/26/2012	5/10/2012
3/17/2012	4/13/2012	April-12	May-12	4/25/2012	6/9/2012
4/14/2012	5/11/2012	May-12	June-12	5/23/2012	7/7/2012
5/12/2012	6/8/2012	June-12	July-12	6/25/2012	8/9/2012
6/9/2012	7/13/2012	July-12	August-12	7/25/2012	9/8/2012
7/14/2012	8/10/2012	August-12	September-12	8/22/2012	10/6/2012
8/11/2012	9/14/2012	September-12	October-12	9/24/2012	11/5/2012
9/15/2012	10/5/2012	October-12	November-12	10/24/2012	12/10/2012
10/6/2012	11/9/2012	November-12	December-12	11/20/2012	1/4/2013
11/10/2012	12/5/2012	December-12	January-13	12/20/2012	2/3/2013

RPC’s Mailing Address

Please send the completed and signed enrollment certification forms to:

Reed & Associates, CPAs – CMS RPC
Attn: Quality Assurance Specialist (Attestations)
13330 California Street, Suite 200
Omaha, NE 68154
Phone: (402) 315-3660