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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 requests. 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 requests 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 requests 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 April 5, 2010 reflects the payment reports that were available on February 19, 2010 regarding the March 2010 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, which in this example is January 9, 2010 through February 5, 2010. 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 CMS 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 March 1, 2010 payment is due on April 5, 2010. This is 45 days after the monthly reports for the March payment were available which was February 19, 2010.

Retroactive Processing Contractor’s Standard Operating Procedure
Certification of Monthly Enrollment and Payment Data (Attestations)

Revised: 04/01/2010

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 2010. 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				
9/12/2009	10/9/2009	October-09	November-09	10/23/2009	12/4/2009
10/10/2009	11/13/2009	November-09	December-09	11/24/2009	1/7/2010
11/14/2009	12/11/2009	December-09	January-10	12/22/2009	2/5/2010
12/12/2009	1/8/2010	January-10	February-10	1/22/2010	3/8/2010
1/9/2010	2/5/2010	February-10	March-10	2/19/2010	4/5/2010
2/6/2010	3/12/2010	March-10	April-10	3/24/2010	5/8/2010
3/13/2010	4/9/2010	April-10	May-10	4/22/2010	6/6/2010
4/10/2010	5/7/2010	May-10	June-10	5/20/2010	7/5/2010
5/8/2010	6/11/2010	June-10	July-10	6/23/2010	8/7/2010
6/12/2010	7/9/2010	July-10	August-10	7/23/2010	9/6/2010
7/10/2010	8/13/2010	August-10	September-10	8/25/2010	10/9/2010
8/14/2010	9/10/2010	September-10	October-10	9/23/2010	11/7/2010
9/11/2010	10/8/2010	October-10	November-10	10/22/2010	12/6/2010
10/9/2010	11/12/2010	November-10	December-10	11/23/2010	1/7/2011
11/13/2010	12/8/2010	December-10	January-11	12/22/2010	2/5/2011

RPC’s Mailing Address

Please send the completed and signed enrollment certification forms to:

Reed & Associates, CPAs – CMS RPC
Attn: Quality Assurance Specialist (Attestations)
14301 FNB Parkway, Suite 211
Omaha, NE 68154
Phone: (402) 315-3660