



**CMS – RETROACTIVE ENROLLMENT & PAYMENT VALIDATION
RETROACTIVE PROCESSING CONTRACTOR (RPC)**

APPENDIX A:

**STATE & ENROLLMENT BROKER RETROACTIVE
SUBMISSION REFERENCE DOCUMENT
(FOR STATES PARTICIPATING IN THE FINANCIAL ALIGNMENT
DEMONSTRATION/MMP DEMONSTRATION)**

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Introduction

Since 2007, Reed & Associates, CPAs, Inc. (Reed) has been under contract with the Centers for Medicare & Medicaid Services (CMS) to process retroactive transactions for all Medicare Advantage Organizations (MAO's), Medicare Advantage Prescription Drug Plans (MA-PDs), Part D Sponsors, Cost-based Plans, Program of All-Inclusive Care for the Elderly (PACE) Plans and Medicare-Medicaid Plans (MMPs), hereafter regarded as Plans. Under the terms of this contract, Reed validates and processes the following transaction types: Enrollments, Disenrollments, MMP Enrollment Cancellations, Plan Benefit Package (PBP) number changes, Reinstatements, Segment number changes, state and county code changes, Medicaid status changes, and LIS Deeming copayment level changes. All transactions submitted by the State users (including their enrollment brokers) must be in accordance with the processes developed by CMS as outlined in this Standard Operating Procedures (SOP). In addition, all retroactive adjustment requests are reviewed against the guidelines established in the Medicare-Medicaid Plan Enrollment and Disenrollment Guidance, the Medicare Managed Care Manual (Chapters 2, 7, 17d, and 19), the Medicare Prescription Drug Benefit Manual (Chapter 3), and all published HPMS memos.

As the prime contractor of the Retroactive Processing contract, it is our responsibility to support CMS' program integrity efforts and to safeguard program funds by processing retroactive transactions, performing Enrollment Data Validation review work, and conducting comprehensive analysis on all applicable enrollment data submitted by States, Enrollment Brokers, and MMPs to identify possible trends and outliers. All data and trend analysis is provided to CMS (Central Offices and Regional Offices) for further action and outreach counseling to all participating States and MMPs.

Purpose

The purpose of this document is to provide State and Enrollment Brokers a succinct abstract of the CMS written guidance and to outline the RPC's responsibility and function within the process of retroactively updating multiple CMS systems. The document will provide a background on the range of Enrollment-based transaction types processed by the RPC, the CMS-defined categories of submission, and the overall process followed by the RPC to ensure the appropriate review and processing of requested updates, if applicable.

CMS Guidance/Regulations

In order to process retroactive transactions, Standard Operating Procedures (SOPs) have been developed by the RPC in accordance with our CMS contract. Any retroactive transactions that are submitted by States and their Enrollment Brokers that do not comply with the CMS guidelines and the State & Enrollment Broker Retroactive Processing SOP may not be accepted. Careful adherence to these guidelines will ensure that retroactive transactions submitted to the RPC will be processed timely and accurately.

The information provided in this document should not be interpreted as CMS policy, nor shall it supersede official CMS enrollment guidance as referenced above. The CMS Regional Office Account Managers and/or the CMS Central Office may, at any time, apply additional requirements on States/Enrollment Brokers when submitting retroactive transactions to the RPC. Please refer to these appropriate CMS guidance resources for policy/regulatory questions and additional details. Each of these guidance documents is available on the RPC's website (<http://www.reedassociates.org/>) in the **CMS Guidelines** section.

Enrollment-Based Transaction Types Processed by the RPC

A. Enrollment Transactions

Enrollment transactions (Transaction Code [TC] 61) are defined as an action that enrolls a beneficiary into a certain MMP contract and PBP numbers.

Enrollment transactions may include:

- Voluntary Requests – when an eligible beneficiary permanently residing in the MMP’s service area completes an enrollment request;
- Passive Enrollments – when a CMS and a State identifies a full-benefit dual or other LIS eligible member and processes enrollment into a certain MMP;
- Contract number correction– this is different than a PBP number correction because it involves a different MMP;
- Enrollment Date Change – when a beneficiary’s effective date needs to be retroactively corrected forward or backward.

NOTE: Do not submit a disenrollment transaction for the existing enrollment with the incorrect date in conjunction with a new enrollment transaction for the correct date. An enrollment transaction with a Justification value of “Due to enrollment effective date error”, is all that is required.

B. Disenrollment Transactions

Disenrollment transactions (TC 51) are defined as an action that terminates a beneficiary’s enrollment in a given MMP.

Disenrollment transactions may include:

- Voluntary Requests – when a beneficiary would like to voluntarily end their enrollment in a MMP;
- Involuntary disenrollment – when a State/Enrollment Broker is required to disenroll members for change in residence (including incarceration), loss of Medicare entitlement, loss of Medicaid eligibility, death of member, or MMP contract termination;

NOTE: When submitting a Disenrollment transaction, enter the first day of the month following the date of disenrollment in the Effective Date field on the MMCO Retroactive Submission Spreadsheet. This date is the first day that the beneficiary no longer has coverage under the listed contract number. For example, if the individual disenrolls or loses eligibility on 4/24/2016, the Effective Date field is 5/1/2016.

C. Enrollment Cancellation Transactions

Enrollment Cancellation transactions (TC 82) are defined as an action that retroactively cancels the beneficiary's enrollment into a certain MMP contract number and PBP number as if it never happened.

D. Reinstatement Transactions

Reinstatement transactions are defined as an action that is taken to correct an erroneous disenrollment that was initiated by the beneficiary, the State, Enrollment Broker, or CMS. A Reinstatement reflects no gap in coverage or changes to the MMP contract and PBP numbers.

Reinstatement transactions may include:

- **Voluntary Reinstatement** – A beneficiary may request to be reinstated into a MMP (same contract and PBP number) that they mistakenly requested a voluntarily disenrollment from. The mistaken disenrollment often occurs as a result of an action that was initiated by the beneficiary;
- **Involuntary Reinstatement** – A State/Enrollment Broker may determine that a beneficiary was erroneously disenrolled from a MMP because of an action taken by the MMP, State or CMS. The State/MMP will request a reinstatement on behalf of the beneficiary to correct the erroneous disenrollment. The most common situations include, but are not limited to the following:
 - a) Erroneous Death Indicator
 - b) Erroneous Loss of Medicare Entitlement
 - c) Erroneous Out of Area Status
 - d) State, or Enrollment Broker error

E. Plan Benefit Package (PBP) Correction Transactions

PBP correction transactions are defined as a move to another PBP number within a given MMP contract number to correct an error made with the initial enrollment transaction.

Instructions for Submission to the RPC (Reed & Associates)

State & Enrollment Broker Retroactive Submission SOP

Please refer to the State & Enrollment Broker Retroactive Submission SOP in the **State & Enrollment Broker Retroactive Submission SOP** section of the RPC website (<http://www.reedassociates.org/>) for detailed instructions on submitting retroactive transactions.

CMS Submission Category

CMS has three distinct processes by which States and Enrollment Brokers will submit retroactive enrollment and disenrollment activity (including PBP corrections, and Reinstatement requests, and Enrollment Cancellation transactions). Each of these processes corresponds to one of the three categories of retroactivity as defined in the February 24, 2009 HPMS memo "Instructions for Submitting Retroactive Enrollment and Disenrollment Activity":

- **Category 1** transactions represent normal business processes that States/Enrollment Brokers may address through the Batch Submission Process, MARx User Interface (UI), or MAPD Help Desk

- **Category 2** transactions represent normal business processes that States/Enrollment Brokers may address through the RPC
- **Category 3** transactions require States to receive concurrence from their CMT counterpart, CMS Regional Office Account Manager (AM), prior to submitting transactions to the RPC because it is outside the timeframe for directly requesting transactions

Please refer to the February 24, 2009 HPMS memo for additional clarification and/or examples of distinguishing Category 2 and 3 transactions.

A. Category 2 Transactions (RO Concurrence is NOT Required) – Definition of “Within 3 months”

Effective dates including the Current Calendar Month (CCM) and the 2 previous calendar months
For RPC purposes, the definition for Category 2 Transactions is defined as transactions with an effective date including the CCM and the 2 previous calendar months.

EXAMPLE: In November, the allowable retroactive effective dates are November 1, October 1 and September 1. Effective dates of August 1 or earlier are considered to be 4 months or greater and therefore are Category 3 (below).

For more information on the Current Calendar Month (CCM) Schedule please refer to section 4.1.2 of the Plan Communications User Guide (PCUG):

https://www.cms.gov/Research-Statistics-Data-and-Systems/CMS-Information-Technology/mapdhelppdesk/Plan_Communications_User_Guide.html.

B. Category 3 Transactions – Definition of “4 Months or older”

Effective dates of the current calendar month minus 3 months or more
If today is any day in November, effective dates of August 1 or prior are 4 months or older, and therefore are Category 3 transactions and get concurrence from the RO Account Manager. This includes, actions reported by CMS to the States, Enrollment Brokers, and MMP via TRR/MMR more than 3 months ago but not submitted timely for processing and therefore are a Category 3 issue.

NOTE: *Category 3 transactions are generally not permitted and are considered to be exceptions. CMS expects all States to have ongoing data reconciliation processes to help prevent the need for enrollment and disenrollment retroactivity that is 4 months or older.*

Involvement of the CMS Regional Office Account Manager (AM)

States/Enrollment Brokers must contact their CMT/CMS Regional Office Account Manager (AM) prior to submitting Category 3 transactions to the RPC. Although the RPC works on behalf of CMS, we are not permitted to make any exceptions to CMS Guidance up to and including the MMP Processing SOP.

The CMS Central Office heavily encourages States and Enrollment Brokers to have a close working relationship with the AM so that they understand how and when to bring exception cases to their attention for further assistance. When it has been determined that a retroactive transaction cannot be processed by the State/Enrollment Brokers or the RPC without an AM concurrence, the State/Enrollment Brokers should notify their AM of the transaction(s) immediately. This may include providing a detailed analysis of the issue identifying responsible areas/parties, current policies and procedures, the scope of the issue with exact numbers, beneficiary impact, and any other relevant information. Upon contact with an AM,

States/Enrollment Brokers must create a Category 3 “Submission Package” for untimely requests in eRPT (<https://portal.cms.gov/>).

The AM will review the eRPT Submission Package and discuss with the State the appropriate remedial steps and actions necessary to ensure future compliance and improved performance. If applicable, the AM will upload a concurrence notice to the Submission Package to indicate the RPC may review and process the associated transactions.

Please only include transactions in need of Account Manager concurrence on the MMCO Retroactive Submission Spreadsheet that is uploaded to eRPT Category 3 Submission Package. Including transactions not needing AM concurrence may result in the rejection of the Submission Package.

The RPC will unfavorably process retroactive transactions if a State/Enrollment Brokers uploads transactions in need of AM concurrence to an eRPT Submission Package not categorized as a Category 3.

The RPC Review and Response Processes

RPC Importing Transactions & Error Reports

The RPC will import the transactions into the tracking system and update the status of the Submission Package in eRPT to “In Process” within five (5) calendar days. Any errors that are noted during the importation process will also be communicated to States/Enrollment Brokers via eRPT as a “Response Document” at that time.

The status of the Submission Package in eRPT and the error report(s) uploaded to the Submission Package should be carefully monitored by State/Enrollment Brokers to ensure that all of the transactions are 1) received by the RPC, and 2) imported properly. A final disposition report (FDR) will not be issued for the records that receive an error message during the importation process. Transactions that cause an error message and are subsequently resubmitted to the RPC are not considered to be resubmissions because they were never processed due to importation errors.

RPC Issuance of Final Disposition Reports (FDRs)

Valid requests for retroactive transactions will be processed by the contractor within **35 days** of receipt. If the RPC determines that it *should* and *can* make the requested changes, the retroactive change will be made in CMS’ systems. MMP payment adjustments will be made according to established policy once CMS processes the changes. Note that MMP payment adjustments are not directly handled by the RPC.

After processing the transactions, the RPC will provide the State/Enrollment Brokers with a Final Disposition Report (FDR) via eRPT to the State/Enrollment Brokers. The FDR communicates the disposition of the transactions to the State/Enrollment Brokers. The disposition codes used by the RPC are available on the RPC’s website (<http://www.reedassociates.org/>) in the **RPC Submission Toolkit** section.

States/Enrollment Brokers must have ongoing membership reconciliation processes that include data comparisons of organization information to all relevant CMS/RPC files and reports including Final

Disposition Reports (FDRs), Transaction Reply Reports (TRRs), and Monthly Membership Reports (MMRs).

If the transaction cannot be processed for any reason, the materials submitted to the RPC will not be returned to the State/Enrollment Brokers; however, the disposition code provided by the RPC on the FDR will indicate why the submission, in whole or in part, could not be completed. The disposition code descriptions should be read very carefully to ensure that each transaction can be properly resubmitted and processed by the RPC. (See Section D for resubmissions.)

If a State/Enrollment Brokers has concerns or questions regarding the determination made by the RPC, they should first contact the RPC's Client Services department by using the Transaction Inquiry form described in Section E. If a transaction is found to have been processed incorrectly by the RPC, then Reed's Quality Assurance department will work with the RPC Processing team to correct the transaction. For transactions or other matters that cannot be resolved by the RPC, States should contact CMT/CMS Regional Office Account Manager for further assistance.

Resubmissions

Following the issuance of the Final Disposition Report (FDR), States/Enrollment Brokers may determine (by reviewing the disposition codes provided on the FDRs) that transactions were not processed by the Retroactive Processing Contractor (RPC). States/Enrollment Brokers may file a resubmission request for previously denied retroactive transactions, once the issues have been identified and resolved.

Please note that transactions that are not imported by the RPC are not issued a FDR. Therefore, the second submission of those transactions to the RPC **would not** be considered a resubmission. States/Enrollment Brokers should submit those transactions following the normal procedures since they were never originally entered into the RPC system.

In general, all of the steps outlined in the RPC Submission SOP must be followed for a resubmission (including all documentation which supports the transaction). There are a few additional requirements for resubmissions to be uploaded and processed.

1. Resubmission transactions must be sent to the RPC within 45 days of receiving the original FDR for the transaction. It is highly recommended that States/Enrollment Brokers reconcile the FDRs to CMS' Systems prior to resubmitting transactions. States/Enrollment Brokers can then submit one master submission for all discrepant retroactive transactions.
2. **Resubmissions of Category 3 transactions will not be accepted without a new concurrence letter from a CMS Regional Office Account Manager.** The RPC will only process Category 3 transactions that were originally denied erroneously without a new RO concurrence letter.
3. Resubmission transactions must be listed on the Excel submission spreadsheet template following the standard submission process described in the MMP Processing SOP.

If your resubmission has been denied multiple times, it is strongly recommended that you contact CMT/CMS Regional Office Account Manager for additional direction.

Transaction Inquiries

To follow up on specific previously-submitted adjustment transactions, an inquiry may be made via “Transaction Inquiry” in eRPT or telephone to our Client Services Department. For inquiries sent via eRPT, States/Enrollment Brokers are advised to complete the RPC Transaction Inquiry Excel template as instructed below.

Completing the RPC Transaction Inquiry Excel Template:

1. Input the following information associated with the submitted transaction:
 - a. Inquiry Type (select the type of inquiry for this transaction)
 - b. Explanation (If you selected “Question on Rejection” or “Other”, please include a brief explanation on your inquiry)
 - c. HICN (beneficiary’s HICN)
 - d. First Name (beneficiary’s first name)
 - e. Last Name (beneficiary’s last name)
 - f. Contract Number (contract number associated with the transaction)
 - g. PBP Number (if appropriate)
 - h. Transaction type (e.g. Enrollment, LIS, Reinstatement, etc.)
 - i. Effective Date
 - j. RPC Receipt Date (the day eRPT provided the notification the RPC downloaded the package)
 - k. The eRPT Package ID for the Submission Package

2. Create a Transaction Inquiry package in eRPT, upload the completed RPC Transaction Inquiry, and select “Submit” to send it to the RPC for review.

The RPC Transaction Inquiry is available on the RPC’s website (<http://www.reedassociates.org/>) in the **RPC Client Services** section.

Note: States/Enrollment Brokers should not submit duplicate transactions unless the Retroactive Processing Contractor specifically requests that duplicate information be submitted. All other general processing inquiries that are not case specific can be made via e-mail or by phone.

RPC’s Client Services Department:

If States/Enrollment Brokers have questions regarding this document and would like more information on the general process of utilizing the RPC, they should contact the RPC’s Client Services Department.

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