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Retroactive Processing Contractor (RPC) – Reed & Associates, CPAs

Effective August 3, 2009, Reed & Associates, CPAs (Reed) was designated by CMS as the national contractor responsible for the review of the transactions submitted by organizations directly to MARx. As part of the MARx R&M release, CMS established this task to ensure transactions submitted by organizations directly to MARx are accurate, valid and supported by appropriate member-related documentation. All submissions to Reed as part of this task must be in accordance with the processes outlined in these Standard Operating Procedures (SOPs) as well as the latest CMS Enrollment Guidance.

CMS Guidance/Regulations

The information provided in this SOP should not be interpreted as CMS policy, nor shall it supersede official CMS enrollment guidance including but not limited to:

- Medicare Managed Care Manual Chapter 2 – Medicare Advantage Enrollment and Disenrollment Instructions
- Medicare Prescription Drug Benefit Manual Chapter 3 – Eligibility, Enrollment and Disenrollment
- Medicare Managed Care Manual Chapter 17d – Medicare Cost Plan Enrollment and Disenrollment Instructions
- Programs of All-Inclusive Care for the Elderly (PACE) Manual Chapter 4 – Enrollment and Disenrollment

Compliance with Standard Operating Procedures (SOPs)

In order to review the enrollment data selected for the monthly sample set, formal procedures have been developed by the RPC in accordance with our CMS contract. Any requested documentation from the organizations that do not comply with the guidelines may not be accepted. Careful adherence to these guidelines will ensure that requested documentation submitted to the RPC will be reviewed timely and accurately.

General Information – The Enrollment Data Validation (EDV) Review Process

Overview:

The RPC has been tasked to develop a process to perform documentation reviews on enrollment-related transactions submitted directly to CMS by MA, MAPD and PDP sponsoring organizations. This shall include but not be limited to Disenrollment (51), Enrollment (61), Residence Address Change (TC 76), Cancellation of Enrollment (TC 80), and Cancellation of Disenrollment (TC 81) transactions submitted to MARx by either the batch process or the User Interface (UI).

Additionally, the RPC is still performing a monthly review of certain RPC Processed Payment Validation requests and is now expanding this task to include the aforementioned randomly selected transactions submitted directly to CMS through MARx post MARx R&M release.

The Enrollment Data Validation (EDV) Review Process consists of a monthly sample review of enrollment related transactions submitted to CMS. All organizations that submit activity via the MARx UI, and/or batch-submitted actions as described above will be selected for the monthly EDV review process.

As part of this review process the RPC shall, at least monthly, request supporting documentation for the transactions selected within the monthly EDV sample set. The monthly sample review will be for the previous month's activity in MARx reported on each organization's TRR.

Upon receipt of the documentation, the RPC shall review the documentation submitted for the sampled transactions to verify the documentation provided by the organization supports the transaction submitted to CMS.

To complete the EDV review process, the RPC will report all findings to the CMS Central Office and the Regional Office Account Managers for final review and to address any follow-up action needed on negative findings.

Sampling Methodology:

The RPC will select a random relative sample based on the total number of accepted UI and batch-submitted transactions from all organizations for each calendar month. The sample size may range from 5% to 100% depending on the total number of transactions submitted, or as directed by CMS. A minimum sample size of five transactions will be selected to ensure a fair and meaningful sample population. For organizations that submitted fewer than five transactions to CMS in a month, all of the accepted transactions will be selected for the sample population.

The sampling methodology criteria may change at any time to include additional reviews as directed by CMS Central Office. This may include but not limited to: transaction type codes, sample size, minimum sample, the status of the transaction, etc.

Transaction Types Included in the Current Monthly Sampling Methodology:

A. Enrollments (Transaction Type Code 61)

Enrollment transactions are defined as an action that initially enrolls a beneficiary into a certain plan contract number and Plan Benefit Package (PBP) number. Effective May 2011, the new MARx Redesign and Modernization system release consolidated PBP Change transactions (Transaction Type Code 71) into Transaction Type Code 61. PBP change transactions are defined as a move within a given contract number to another PBP number.

B. Disenrollments (Transaction Type Code 51)

Disenrollment transactions are defined as an action that terminates a beneficiary's enrollment in a given plan.

C. Enrollment Cancellations (Transaction Type Code 80)

Enrollment cancellations are defined as an action initiated by the beneficiary to cancel an enrollment transaction.

D. Disenrollment Cancellations (Transaction Type Code 81)

Disenrollment cancellations are defined as an action that cancels a previously submitted disenrollment, leaving no gap in coverage for the beneficiary.

E. Residence Address Changes (RACs) (Transaction Type Code 76)

Beneficiaries' state and county of residence is an enrollment eligibility requirement and has a direct effect on the determination of a member's eligible service area. Effective May 2011, with the new MARx Redesign and Modernization system release, organizations can directly update their member's State and County Code (SCC) by submitting a Transaction Type Code 76 or Residence Address Change directly to MARx either through batch or the User-Interface (UI).

Requests for Documentation Spreadsheets:

To request the supporting documentation for the sampled transactions, the RPC shall, at least monthly, send each organization selected for the EDV review an Excel file (Enrollment Data Validation (EDV) Spreadsheet) listing the sampled transactions. The EDV Spreadsheet will be sent via a "Review Package" in the Electronic Retroactive Processing Transmission (eRPT) system (<https://portal.cms.gov/>). The review package will be submitted via the eRPT system approximately between the 7th and 10th business day of each month.

Upon receiving the list of sampled transactions, plans will have seven business days to submit the required supporting documentation for each transaction. Plans whose documentation is not **received** by the RPC within seven business days will automatically fail the EDV review process and may be subject to further action with their Account Manager.

For assistance with identifying the appropriate supporting documents to return to the RPC for each sampled transaction, please refer to the "EDV Documentation Requirements Matrix" with supplemental information on the specific documentation to include for various transactions. The EDV Documentation Requirements Matrix can be found at our website under the EDV Toolkit. If organizations have questions regarding a sampled transaction, they should contact the RPC's Client Services Department.

The requested documentation should be returned to the RPC via the eRPT "Review Package" that was sent to the organization to initiate the EDV review process.

The RPC Review Process:

The RPC will have 35 days upon receipt of the organization's response to review each documentation package. The RPC shall review the documentation submitted for the sampled transactions to verify the appropriateness of the transaction per CMS Guidance and that adequate supporting documentation for that transaction is being maintained by the organizations. The RPC will consider the EDV cycle complete once the documentation for every sampled transaction for all included organizations have been reviewed.

Reporting Requirements:

Upon completion of the entire month's EDV cycle, the RPC will report all findings to the CMS Central Office for initial review. Shortly after Central Office's review, a final report with the results for each organization will be sent to the Regional Office Account Managers for final review and to address any follow-up action needed on negative findings.

The results of the EDV review may be shared with the organizations solely at the discretion of the Account Manager. Accordingly, the RPC will not supply the organizations with a copy of the results report.

Likewise, if an organization wishes to dispute the review results made on a sampled transaction, please route those requests through the Regional Office Account Manager assigned to your organization.

Instructions for Submitting Requested Documentation to the RPC (Reed & Associates)

As indicated above, upon receipt of the previously described EDV Spreadsheet, organizations must respond within seven business days with appropriate supporting documentation for each transaction listed on the EDV Spreadsheet. Please follow the instructions listed below to prepare the requested documentation to be sent to the RPC.

For assistance with identifying the appropriate supporting documents to return to the RPC for each sampled transaction, please refer to the EDV Documentation Requirements Matrix with supplemental information on the specific documentation to include for various transactions. The Enrollment Data Review Validation Documentation Requirements Matrix can be found at our website under the EDV Toolkit. If organizations have questions regarding a sampled transaction, they should contact the RPC's Client Services Department.

The following sections provide instructions on how to send the supporting documents to the RPC for transactions selected for an Enrollment Data Validation Review:

Organizations Submitting Requested Documentation to the RPC

Requested documentation that meets all of the requirements explained in this SOP should be returned to the RPC via the eRPT system (<https://portal.cms.gov/>), using the "Review Package" that was sent to the organization to initiate the EDV review process. Organizations should ensure that all packages returned to the RPC have been reviewed very carefully noting that all elements described below are included. Any packages received by the RPC that do not meet the requirements in this SOP will not be reviewed.

Requested Documentation Packaging Instructions:

A. Requested Documentation

Documentation supporting each transaction must be submitted electronically as PDF files via the eRPT system (<https://portal.cms.gov/>), using the "Review Package" that was sent to the organization to initiate the EDV review process.

The use of documentation which has not been approved by CMS could negatively impact the RPC's review of the sampled transaction. Organizations should only submit documentation that is outlined as acceptable in the CMS guidance. See the EDV Documentation Requirements Matrix under the EDV Toolkit section of the RPC's website for more detailed information.

Each documentation packet must include the Enrollment Data Validation Documentation Worksheet (found on the RPC's website) that corresponds to the sampled transaction along with the specific documents required for the type of transaction and situation. The documentation worksheet for each request must provide sufficient information for the RPC to understand any special circumstances with the transaction.

In order for your electronic documentation to be accurately matched to the transactions listed on the Documentation Request spreadsheet, you must submit the documentation in a single PDF file for each transaction. ***Use the Transaction ID provided on EDV Spreadsheet as the file name for the electronic documentation.*** The Transaction ID is the same number listed in the "System Assigned Transaction Tracking ID" field (position #70) on the Daily Transaction Reply Report (TRR). The requested documentation will not import properly if the Transaction ID is not used as the file name. Any additional characters or missing information in the file name could negatively impact the RPC's review of the sampled transaction.

Organizations should also retain a copy of the requested documentation submitted to the Retroactive Processing Contractor as part of the record for each beneficiary. Organizations should not submit duplicate documentation packets for sampled transactions unless the Retroactive Processing Contractor specifically requests that duplicate information be submitted.

IMPORTANT: As outlined above, the exact syntax must be used when naming the supporting documentation file to ensure it is imported into our system and correctly matched to the transaction listed on the Enrollment Data Validation (EDV) Spreadsheet. The standard process for submitting retroactive processing transactions electronically is to upload the supporting documentation to the "Review Package" received in eRPT system from the RPC.

NOTE: There is no need to encrypt files uploaded to eRPT as it is a secure system.

Enrollment Data Validation Disputes

As indicated above, to dispute the review results on specific sampled transactions, please contact the Regional Office Account Manager assigned to your organization. If the Account Manager determines an EDV Dispute is valid, the information will be forwarded to the RPC for review.

RPC's Client Services Department

For all other inquiries regarding the Enrollment Data Validation review process, please feel free to contact our Client Services department:

Reed & Associates, CPAs – CMS RPC
Attn: Client Services Department
11717 Burt Street, Suite 103
Omaha, Nebraska 68154

Phone: (402) 315-3660
E-mail: clientservices@reedassociates.org

Furthermore, all system issues and questions regarding the eRPT application should be forwarded to the MAPD Help Desk (email: MAPDHelp@cms.hhs.gov; phone: 1-800-927-8069). Although the RPC relies heavily on the eRPT application, its development and maintenance is managed by another CMS contractor. Therefore, the RPC can only provide limited support regarding the application.