



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

**STATE & ENROLLMENT BROKER RETROACTIVE SUBMISSION
STANDARD OPERATING PROCEDURE
(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 (RPC), 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 States and Enrollment Brokers with a general overview of the process for submitting retroactive transaction requests to the RPC. This document outlines the steps required to be taken prior to and during the submission of the packages via the Electronic Retroactive Processing Transmission (eRPT) system.

Compliance with Standard Operating Procedures (SOPs)

In order to facilitate the electronic transmission and processing of retroactive transactions, CMS and the RPC have created guidelines in accordance with our CMS contract. States and Enrollment Brokers should ensure that all packages sent 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 processed.

Package Preparation

Prior to a package submitted via eRPT being received, processed (if applicable) and reported on by the RPC, the following steps must first be followed:

1. Download MMP Submission Toolkit Documents

- a. MMCO Retroactive Submission Spreadsheet – An Excel file used to input data for each transaction requested for RPC processing.
- b. MMCO Required Documentation – A template used to satisfy the “Cover Letter” and “Supporting Documentation” requirements in the eRPT application.
- c. Appendix A: State & Enrollment Broker Retroactive Transactions Reference Document - A succinct abstract of the CMS written guidance and an outline of the RPC's responsibilities and functions.
- d. Definition of Codes on Final Disposition Reports (FDRs) – A listing of the disposition codes and descriptions used on FDRs to report results of requested transactions.

2. Determine a CMS Submission Category

CMS has three distinct processes by which States/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/Enrollment Brokers 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 and Appendix A of this SOP, on the RPC's website, for expanded descriptions for Category 2 and 3 transactions.

All transactions (both Category 2 and 3) requiring CMS Regional Office Account Manager (AM) concurrence should be submitted separately as a Submission Package with an appropriate category type via the eRPT application. States/Enrollment Brokers

should not include any transactions not requiring an AM concurrence within the same submission spreadsheet as those transactions requiring AM concurrence.

3. Complete a MMCO Retroactive Submission Spreadsheet

Retroactive transactions must be gathered by the State/Enrollment Brokers on the Excel submission spreadsheet template. Each transaction type processed by the RPC is included in a separate tab within the template.

The formatting of the submission spreadsheet template should not be changed, or the spreadsheet may not upload properly. Components (including tab names, column headers, column order, cell placement and cell formatting) must be in a proper format to facilitate the upload process. Additionally, there are drop-down boxes for several of the columns which require very specific responses. Basic instructions on how to complete each column of the spreadsheet are included on the spreadsheet itself, below the column headers. If you have questions on how to complete the spreadsheet, please contact the RPC's Client Services Department.

If the State and/or the Enrollment Brokers automate the spreadsheet completion process, it is suggested that all of the spreadsheet components are carefully reviewed (especially the required responses for the drop-down boxes) to avoid errors with the RPC's importation process. **The RPC will not import transactions that do not conform to the required formatting of the MMCO Retroactive Submission Spreadsheet.**

In order to assist you in completing the MMCO Retroactive Submission Spreadsheet, the RPC has developed a Validation Tool for the spreadsheet. It is essential that you take advantage of this tool to avoid common importation errors. Please note that this tool will not catch all importation errors; however, it may significantly reduce the number of errors.

In order to take advantage of this helpful tool, it is necessary to click on the "**Enable Macros**" button when opening the spreadsheet. If you are not prompted to select this option, you may need to lower your Macro Security setting in Excel from "High" to something lower (Tools>Security>Macro Security).

If you elect to "Enable Macros", you will be able to utilize the Validate button. Once pressed, this button runs a program to verify the data in the current tab of the spreadsheet you are working on. If errors are noted, please correct prior to submitting the transactions to the RPC.

If you elect to "Disable Macros", you will still be able to utilize the spreadsheet to submit your transactions; **however, should your spreadsheet not be formatted**

correctly, some transactions included in your submission may fail to be accepted or imported into our system.

NOTE: Whether you choose to utilize the Validation Tool or not, the completed submission spreadsheet must be saved in an "xls" or an "xlsx" file format in order to upload it to the eRPT system. This can be accomplished on the "Save As" window in the "Save as Type" field by selecting "Excel Workbook" or "Excel Workbook 97-2003."
There is no need to encrypt files prior to uploading to eRPT as it is a secure system.

Package Transmission

Upon completion and gathering of the required documents above, a package must be completed in the eRPT system for submission to the RPC. The eRPT system is a web-based application used to electronically transmit and store retroactive Submission Packages as well as to respond to Review Packages for the Enrollment Data Validation (EDV) process. States/Enrollment Brokers are also able to submit questions and comments to the RPC via a Transaction Inquiry submission in the system. Should a Submission Package require an Account Manager's concurrence, the system will forward the package to the CMS Regional Office prior to submission to the RPC.

1. Access the eRPT system

Log in to the system at <https://portal.cms.gov/> using your EIDM user name and password. For more information on the eRPT application, please refer to the eRPT Plan User Manual saved in the MAPD Help Desk's communications archive (navigate to <https://www.cms.gov/Research-Statistics-Data-and-Systems/CMS-Information-Technology/mapdhelpdesk/index.html>, enter "eRPT" in the "Filter On" field, and select the link to the most current version of the Electronic Retroactive Processing Transmission (eRPT) User Manual).

2. Create Package

- a. Select "Create Package" in the top, right-hand side of the main screen.
- b. Complete the required data fields
 - i. Package Type (Defaulted to Submission Package)
 - ii. Category
 - iii. Parent Organization – Please select the value of "MMP Demo States Only"; *this field does not automatically default.*

- c. Add the necessary files for RPC processing and eRPT transmission by selecting “Add Files” on the “Documentation” screen. Navigate your internal network to locate the required files and documents to be added to the package. Once the files are located, select the file name and “Open” or “Save.” For each file saved to the package, select the appropriate Document Type value in the dropdown to the left of the file name. Please include the following files and use the corresponding values:

MMP Toolkit Item	File Type	eRPT "Document Type"
MMCO Retroactive Submission Spreadsheet	xls or xlsx	RPC Submission Spreadsheet
MMCO Required Documentation	PDF	RPC Submission Cover Letter
MMCO Required Documentation (second copy)	PDF	RPC Supporting Documentation

- d. Once all required files for the package have been added, select “Start Upload.”
- e. Upon successfully uploading the documents, select “Submit.” The system will then display a message informing the user of a successfully created package and will route the package to the intended destination.

Upon reviewing the cases on the submission spreadsheet, the AM will upload a concurrence notice to eRPT Submission Package, and the eRPT system will route the package directly to the RPC. Please refer to Appendix A: State & Enrollment Broker Retroactive Transactions Reference Document for more information regarding the AM concurrence and the selection of the correct submission category.

Note: For detailed instructions, including screen shots, on how to create a Submission Package in the eRPT application, please refer to §4.3.1 (Create Package) of the eRPT Plan User Manual saved in the MAPD Help Desk’s communications archive: <https://www.cms.gov/Research-Statistics-Data-and-Systems/CMS-Information-Technology/mapdhelpdesk/index.html>.

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.

RPC's Client Services Department:

If States/Enrollment Brokers have questions regarding this document or this process and would like more details on how to prepare and transmit retroactive transactions, they should contact the RPC's Client Services Department.

Reed & Associates, CPAs – CMS RPC
Attn: Client Services Department
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Omaha, Nebraska 68154
Phone: (402) 315-3660
E-mail: clientservices@reedassociates.org

Appendix A – Reference Document:

Please refer to separate document entitled *State & Enrollment Broker Retroactive Transactions Reference Document*.