



**CENTERS FOR MEDICARE AND MEDICAID SERVICES (CMS)**

**RETROACTIVE ENROLLMENT & PAYMENT VALIDATION**

**RETROACTIVE PROCESSING CONTRACTOR (RPC)**

**ENROLLMENT DATA VALIDATION (EDV) REVIEW**

**STANDARD OPERATING PROCEDURE**

**(FOR ENROLLMENTS, DISENROLLMENTS, ENROLLMENT CANCELLATIONS,  
DISENROLLMENT CANCELLATIONS, & RESIDENCE ADDRESS CHANGES)**

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

Effective August 3, 2007, Reed & Associates, CPAs (Reed) was designated by Centers for Medicare & Medicaid Services (CMS) as the national contractor responsible for the review of the transactions submitted by organizations directly to Medicare Advantage Prescription Drug System (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 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
- Medicare-Medicaid Plan Enrollment and Disenrollment Guidance
- CMS published Health Plan Management System (HPMS) memos

The Medicare Managed Care Manual (Publication # 100-16) is available on the web at:

<https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Internet-Only-Manuals-IOMs-Items/CMS019326>

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## **Compliance with Standard Operating Procedures (SOPs)**

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.

### ***The Enrollment Data Validation (EDV) Review Process***

#### ***Overview:***

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 will 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 Transaction Reply Report (TRR).

Upon receipt of the documentation, the RPC will 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. The findings will also be assessable to the organization through the Electronic Retroactive Processing Transmission (eRPT) system.

#### ***Transaction Types Included in the EDV Review Process:***

##### **A. Enrollments (Transaction Type Code 61)**

Enrollment transactions are defined as an action that initially enrolls a beneficiary into a given plan contract number and Plan Benefit Package (PBP) number. 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. MMP Enrollment Cancellations (Transaction Type Code 82)**

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

**E. 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.

**F. Residence Address Changes (RACs) (Transaction Type Code 76)**

Residence Address Changes are defined as changes in residential address information.

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

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

Upon receiving the list of sampled transactions, organizations will have seven business days to submit the required supporting documentation for each transaction. Organizations whose documentation is not **received** by the RPC within seven business days will automatically fail the EDV review process.

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" The EDV Documentation Requirements Matrix is located on the Reed & Associates website under the EDV

Toolkit. If organizations have questions regarding a sampled transaction, they may contact the RPC's Client Services Department.

### *Organizations Submitting Requested Documentation to the RPC*

Requested documentation that meets all the requirements explained in this SOP should be returned to the RPC via the eRPT system (<https://portal.cms.gov/>), using the "Review Package." Organizations should ensure that all packages returned to the RPC have been reviewed very carefully, noting that all elements described below are included.

### *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."

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 Reed & Associates website for more detailed information.

Each documentation packet should include the Enrollment Data Validation Documentation Worksheet (found on the Reed & Associates 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 should provide sufficient information for the RPC to understand any special circumstances with the transaction.

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 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.

**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 documentation 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**

To dispute the review results on specific sampled transactions, please complete the EDV Dispute Form located in the Enrollment Data Validation Toolkit on the Reed & Associates website and e-mail the completed form directly to the RPC at [EDVDisputes@reedassociates.org](mailto:EDVDisputes@reedassociates.org).

The Regional Office Account Management Team member assigned to your organization ***must*** be copied on the e-mail. If your Regional Office Account Management Team member is ***not*** copied on the e-mail, your request will be denied by the RPC.

Once EDV Detailed Reports are made assessable to the organization in eRPT, you will have six months to submit an EDV Dispute Form to the RPC.

If the sampled transactions being disputed are more than six months old, the organization will need to send the EDV Dispute to the Regional Office Account Management Team member assigned to your organization. If the Regional Office Account Management Team member determines the 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:

Phone: (402) 315-3660

E-mail: [clientservices@reedassociates.org](mailto:clientservices@reedassociates.org)

System issues and questions regarding the eRPT application should be forwarded to the MAPD Help Desk (email: [MAPDHelp@cms.hhs.gov](mailto: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.

**Acronyms and Abbreviations**

| <i>Acronyms &amp; Abbreviations</i> | <i>Definitions</i>                                   |
|-------------------------------------|--|
| AM                                  | Account Manager                                      |
| BAE                                 | Best Available Evidence                              |
| CCM                                 | Current Calendar Month                               |
| CMS                                 | Centers for Medicare and Medicaid Services           |
| CMS ART                             | CMS - Analysis, Reporting and Tracking (ART) system. |
| CTM                                 | Complaint Tracking Module                            |
| DMEC                                | Division of Medicare Enrollment Coordination         |
| EDI                                 | Electronic Data Interchange                          |
| EDV                                 | Enrollment Data Validation                           |
| EGHP                                | Employer Group Health Plan                           |
| ELMO                                | Eligibility Enrollment Medicare Online               |
| eRPT                                | Electronic Retroactive Processing Transmission       |
| FBDE                                | Full Benefit Dual Eligible Individual                |
| FDR                                 | Final Disposition Report                             |
| HCC                                 | Hierarchical Condition Categories - CMS-HCC          |
| HHS                                 | Health & Human Services                              |
| HPMS                                | Health Plan Management System                        |
| IOM                                 | Institute of Medicine                                |
| LIS                                 | Low Income Subsidy                                   |
| MA                                  | Medicare Advantage                                   |
| MAO                                 | Medicare Advantage Organizations                     |
| MAPD                                | Medicare Advantage Prescription Drug                 |
| MA-PD                               | Medicare Advantage Prescription Drug Plan            |
| MARx                                | Medicare Advantage Prescription Drug System          |
| MBD                                 | Medicare Beneficiary Database                        |
| MBDSS                               | Medicare Beneficiary Database Suite of Systems       |
| MBI                                 | Medicare Beneficiary Identifier                      |
| MCO                                 | Managed Care Organization                            |
| MMA                                 | Medicare Modernization Act (of 1999)                 |
| MMCO                                | Medicare Medicaid Coordination Office                |
| MMP                                 | Medicare/Medicaid Plan                               |
| MMR                                 | Monthly Membership Reports                           |
| PACE                                | Program of All-Inclusive Care for the Elderly        |



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| <i>Acronyms &amp;<br/>Abbreviations</i> | <i>Definitions</i>                       |
|---|--|
| PBP                                     | Plan Benefit Package                     |
| PCUG                                    | Plan Communication User Guide            |
| PDF                                     | Portable Document Format                 |
| PDP                                     | Prescription Drug Plan                   |
| RAPS                                    | Risk Adjustment Processing System        |
| RAS                                     | Risk Adjustment System                   |
| RO                                      | Regional Office                          |
| RPC                                     | Retroactive Processing Contractor (Reed) |
| SAA                                     | State Administering Agency               |
| SAR                                     | Service Area Reductions                  |
| SCC                                     | State & County Code                      |
| SOP                                     | Standard Operating Procedure             |
| SSA                                     | Social Security Administration           |
| TC                                      | Transaction Code                         |
| TRC                                     | Transaction Reply Code                   |
| TRR                                     | Transaction Reply Report                 |
| TTC                                     | Transaction Type Code                    |
| UI                                      | User Interface                           |