Module 4 - 2015 Reinsurance Contributions:
Updating Contributions Filings

October 14, 19 and 21, 2015

Payment Policy & Financial Management Group,
Division of Reinsurance Operations Training Series
Session Guidelines

• This is a 90 minute webinar session
• For questions regarding content, please submit inquiries to: reinsurancecontributions@cms.hhs.gov
• For questions regarding logistics and registration, please contact the Registrar at: (800) 257-9520
Agenda

- Review Common Filing Discrepancies
- How to Discover a Discrepancy
- How to Review and Duplicate the 2015 Form
- Completing a two-part contribution payment
- Refiling versus Resubmitting the 2015 Form
- Correcting Automated Clearing House (ACH) Debit Transaction Failure
- Form and Supporting Documentation Mismatch
- Correcting Annual Enrollment Count
- Re-submitting Supporting Documentation
Intended Audience

- Health Insurance Issuers
- Plan Sponsors
- Third Party Administrators (TPAs)
- Administrative Services-Only (ASO) Contractors
Contributions Submission Process

1. Calculate Annual Enrollment Count
2. Prepare Supporting Documentation, if applicable
3. Enter payment information
4. Upload Supporting Documentation
   - Four (4) or more Entities
   - Three (3) or fewer Entities
5. Sign in or register on Pay.gov
6. Complete Contribution Form
Common Filing Discrepancies

The most common discrepancies include:

1. Scheduled only One-part of a Two-part Collection
2. ACH Debit Failure
3. 2015 Form and Supporting Documentation Do Not Match
4. Incorrect Annual Enrollment Count
5. Supporting Documentation Formatting Error
You can remediate receiving notifications from CMS by thoroughly reviewing the 2015 Form; therefore review your filing for the following type of discrepancies:

- If filing a two-part collection, did you file and schedule both the First Collection and the Second Collection?
- Did you use accurate banking information?
- Has the ACH debit block (7505008015) been removed from the account?
- Does the Annual Enrollment Count entered in the Form accurately reflect the reinsurance covered lives in your plan using an approved counting method?
- If applicable, does the aggregated Annual Enrollment Count included in the Supporting Documentation match the aggregated Annual Enrollment Count entered in the Form?
- If applicable, was the Supporting Documentation uploaded to Pay.gov in the correct (.CSV) format and layout?
When CMS discovers a filing discrepancy, the Contributing or Reporting Entity (as applicable) will receive an **Action Required** email. The most common discrepancies include:

- Scheduling only a single part of a two-part collection
- ACH failure
- Form and Supporting Documentation mismatch
- Supporting Documentation format discrepancy

**Resubmission (Type of Filing)** is used when updating Supporting Documentation.
CMS Discovery

CMS will specify the type(s) of discrepancies discovered via email.

- The e-mail will state what discrepancy is identified in your filing.
- The email will include the “Action Required” in the Subject Line.
- Specific instructions to resolve the discrepancy are provided.

Contributing (or Reporting) Entity Discovery

Contributing Entity (or Reporting) discovers a discrepancy:

Review these slides and other applicable guidance relevant to your discrepancy.

Re-file or resubmit the Form as appropriate for your discrepancy.

- For further assistance and guidance, email reinsurancecontributions@cms.hhs.gov and provide details regarding your discrepancy.
How to Review 2015 Form Filings?

Navigate to your previous 2015 Form filings by logging into Pay.gov.

Sign in using the user name and password used when you originally completed the 2015 Form.
From the menu at the top of the screen, select My Account.

Under My Account > My Forms, select the **View My Forms** button.
REMINDER: The user will review by the Pay.gov tracking number to ensure the proper Form is viewed or duplicated.

From this section of Pay.gov, you can:
- View the Form as a PDF
- Duplicate the Form to Re-file
- Duplicate the Form to Complete Resubmission

If you discover a discrepancy when reviewing your completed Form, email reinsurancecontributions@cms.hhs.gov and provide specific information regarding the discrepancy.
Discrepancy Scenario #1: One-Part of a Two-Part Collection Filed

- Failing to file and schedule both payments for a two-part collection will cause a discrepancy.
- To resolve this discrepancy, you will duplicate the Form already filed for the one payment of the two-part collection.
- **REMINDER:** The user will view Forms by the Pay.gov tracking number to ensure the proper Form is viewed or duplicated.
### Discrepancy Scenario #1: One-Part of a Two-Part Collection Filed (continued)

<table>
<thead>
<tr>
<th>Discrepancy #1</th>
<th>Two-Part Collection Filed – Filed ONLY the First Collection OR the Second Collection – No companion payment filed.</th>
</tr>
</thead>
</table>
| **Resolution** | • Follow the steps for duplicating the Form.  
• Ensure **New** is selected as the Type of Filing.  
• Select the missing payment type (First Collection or Second Collection) under Type of Payment that was not filed.  
  o For example, if you completed the 2015 Form for the First Collection, choose Second Collection under Type of Payment; or  
  o If you completed the 2015 Form for the Second Collection, choose First Collection under Type of Payment.  
• Verify all information is accurate, and schedule payment. |
Ensure **New** is selected as the Type of Filing.

- **Select Second Collection** to file the Second Collection contribution or **First Collection** to file the First Collection contribution.
- Verify all information on the Form, and schedule payment.

When duplicating the Form, you must update the **Type of Payment** in order to update the payment amount and prevent a duplicate payment.
## Two-Part Collection Deadlines for 2015

<table>
<thead>
<tr>
<th>Date</th>
<th>Activity</th>
<th>Contribution Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>First Collection</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No later than November 16, 2015</td>
<td>Submit Form and schedule payment for the <strong>First Collection</strong></td>
<td></td>
</tr>
<tr>
<td>No later than January 15, 2016</td>
<td>Remit first contribution amount</td>
<td>$33.00 per covered life</td>
</tr>
<tr>
<td><strong>Second Collection</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No later than November 16, 2015</td>
<td>Submit Form and schedule payment for the <strong>Second Collection</strong></td>
<td></td>
</tr>
<tr>
<td>No later than November 15, 2016</td>
<td>Remit second contribution amount</td>
<td>$11.00 per covered life</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td></td>
<td><strong>$44.00</strong></td>
</tr>
</tbody>
</table>
Resubmission vs. Re-filing

Before making updates or corrections, it is important to understand the difference between Resubmission and Re-filing.

**Resubmission**
Used only in an instance when Supporting Documentation (.CSV file) must be corrected and resubmitted for the Form.

**Re-filing**
Used to correct or replace an existing filing under the following circumstances:
- ACH debit failure
- Banking information change
- Error in Annual Enrollment Count

In some instances, you must first cancel your original filing prior to refileing.
## Discrepancy Scenario #2: Correcting ACH Failure

<table>
<thead>
<tr>
<th>Discrepancy #2</th>
<th>Bank rejects ACH Debit transaction</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Resolution</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Payment cancelation of previous Form is not necessary.</td>
</tr>
<tr>
<td></td>
<td>• Duplicate the original Form, and select Re-File under the Type of Filing section.</td>
</tr>
<tr>
<td></td>
<td>• Include previous Pay.gov Tracking ID of the Form in which payment was rejected or not processed.</td>
</tr>
<tr>
<td></td>
<td>• Enter corrected ACH debit information and schedule payment.</td>
</tr>
<tr>
<td></td>
<td>• If ACH failure is due to ACH debit block, you must first contact the bank and provide the following:</td>
</tr>
<tr>
<td></td>
<td>• ALC+2 value <strong>7505008015</strong></td>
</tr>
<tr>
<td></td>
<td>• Company ID <strong>USDEPTHHSCMS</strong></td>
</tr>
<tr>
<td></td>
<td>• Re-file and schedule payment of the Form after accommodating the necessary time for the bank to clear the ACH debit block.</td>
</tr>
</tbody>
</table>
Discrepancy Scenario #2: Correcting ACH Failure (continued)

Select Re-Filing from the Type of Filing page.

- Note the Pay.gov Tracking ID.
- Select Duplicate from the My Forms section.
Discrepancy Scenario #2: Correcting ACH Failure (continued)

- Enter the Pay.gov Tracking ID of the failed transaction; CMS links the filings.

If the saved banking information was correct, select the **Review and Submit Payment** button.
If the original banking information was incorrect, select the radio button next to **I want to enter a new account** to re-enter the correct banking information.

It could take a bank two to three weeks to accept and clear an ACH debit block.
## Discrepancy Scenario #3(a): Form and Supporting Documentation Annual Enrollment Count Mismatch – Error on the 2015 Form

<table>
<thead>
<tr>
<th>Discrepancy #3(a)</th>
<th>Form and Supporting Documentation mismatch with Annual Enrollment Count entered incorrectly on the 2015 Form</th>
</tr>
</thead>
<tbody>
<tr>
<td>Resolution</td>
<td></td>
</tr>
<tr>
<td>If</td>
<td>The transaction status has not settled</td>
</tr>
<tr>
<td>Then</td>
<td>Cancel the original filing and Re-File, entering the correct Annual Enrollment Count and upload the accurate Supporting Documentation. Be sure to include the prior Pay.gov Tracking ID associated with the canceled Form filing.</td>
</tr>
<tr>
<td></td>
<td>The transaction has settled, AND the Annual Enrollment Count on the Form was calculated incorrectly resulting in an under-reporting (under payment)</td>
</tr>
<tr>
<td></td>
<td>Re-file and enter the difference in the Annual Enrollment Count field and then upload the accurate Supporting Documentation. Be sure to include the prior Pay.gov Tracking ID associated with the prior Form filing.</td>
</tr>
<tr>
<td></td>
<td>The transaction has settled, AND the Annual Enrollment Count was calculated incorrectly resulting in an overpayment</td>
</tr>
<tr>
<td></td>
<td>Review the “Transitional Reinsurance Program – Timing of Contributions Refund Requests Due to Annual Enrollment Count Misreporting” April 2015 guidance. Email <a href="mailto:reinsurancecontributions@cms.hhs.gov">reinsurancecontributions@cms.hhs.gov</a> for further assistance. Be sure to include the Pay.gov Tracking ID associated with the Form filing in question.</td>
</tr>
<tr>
<td>Discrepancy #3(b)</td>
<td>Form and Supporting Documentation mismatch with Annual Enrollment Count entered incorrectly on the Supporting Documentation.</td>
</tr>
<tr>
<td>-------------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| Resolution        | 1) Update the Supporting Documentation  
2) Duplicate the Form (note the Pay.gov Tracking ID)  
3) Select Resubmission as the Type of Filing  
4) Enter the Previous Pay.gov Tracking ID  
5) Upload the updated Supporting Documentation |
Under My Account > Payment Activity, select the **View Payment Activity** button.
Verify Transaction Status (continued)

<table>
<thead>
<tr>
<th>Payment Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>All (1)</strong></td>
</tr>
</tbody>
</table>

Sort by **Transaction Date**

<table>
<thead>
<tr>
<th>2015 ACA Transitional Reinsurance Program</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual Enrollment Contributions</td>
</tr>
<tr>
<td>Health and Human Services (HHS): Centers for Medicare &amp; Medicaid Services (CMS)</td>
</tr>
<tr>
<td>Pay.gov Tracking ID: 3FP0PD12</td>
</tr>
<tr>
<td>Transaction Date: 09/21/2015 11:37:24 AM EDT</td>
</tr>
<tr>
<td>Transaction Amount: $16,500.00</td>
</tr>
<tr>
<td>Payment Type: Bank account (ACH)</td>
</tr>
<tr>
<td><strong>Transaction Status:</strong> Received</td>
</tr>
<tr>
<td><strong>Payment Date:</strong> 07/04/2016</td>
</tr>
<tr>
<td><strong>Frequency:</strong> OneTime</td>
</tr>
</tbody>
</table>

Transaction Status:
- Received – Scheduled, but not paid
- Settled – Payment in Transit or Paid
- Retired – Transaction failed processing
Cancel the Filing

Once the Transaction Status is identified as not settled or retired, select **Cancel** to cancel the payment.

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**Payment Activity**

<table>
<thead>
<tr>
<th>All (1)</th>
<th>Completed (0)</th>
<th>Rejected (0)</th>
<th>Pending (1)</th>
</tr>
</thead>
</table>

Sort by: **Transaction Date**

**2015 ACA Transitional Reinsurance Program**

**Annual Enrollment Contributions**

Health and Human Services (HHS): Centers for Medicare & Medicaid Services (CMS)

Pay.gov Tracking ID: 3FP0PD12

Transaction Date: 09/21/2015 11:37:24 AM EDT

Transaction Amount: $16,500.00

Payment Type: Bank account (ACH)

Transaction Status: Received

Payment Date: 01/04/2016

Frequency: One Time
## Discrepancy Scenario #4: Incorrect Annual Enrollment Filed

<table>
<thead>
<tr>
<th>Discrepancy</th>
<th>Incorrect Annual Enrollment Count entered on the 2015 Form</th>
</tr>
</thead>
<tbody>
<tr>
<td>Resolution</td>
<td>If</td>
</tr>
<tr>
<td></td>
<td>The transaction status has not settled,</td>
</tr>
<tr>
<td></td>
<td>The transaction has settled, AND the Annual Enrollment Count was calculated incorrectly resulting in under-reporting (under payment),</td>
</tr>
<tr>
<td></td>
<td>The transaction has settled, AND the Annual Enrollment Count was calculated incorrectly resulting in an overpayment,</td>
</tr>
</tbody>
</table>
Re-Filing the Form – Correcting Annual Enrollment Count when Transaction has not Settled or when Annual Enrollment Count is Under-reported

Follow the directions for duplicating a Form, and then:

1) Select **Re-Filing** under Type of Filing.
2) Update and verify the **Annual Enrollment Count**.
3) Enter the cancelled Form’s Pay.gov Tracking ID when correcting the Annual Enrollment Count and the payment had not settled; or enter the initial Form’s Pay.gov Tracking ID when the transaction has settled, and the Annual Enrollment Count was calculated incorrectly resulting in under-reporting (under payment).
4) Schedule payment.

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![CMS Logos and Pay.gov Tracking ID](WWW.REGTAP.INFO)
Annual Enrollment Count Over-Reported and Payment Settled (Refund Request)

- Please see the “Transitional Reinsurance Program - Timing of Contributions Refund Requests Due to Annual Enrollment Count Misreporting,” published April 14, 2015.
- As stated in this Guidance, for the 2015 Benefit Year, permitted refund requests must be submitted **90 days from the date of Form submission.**
• A Contributing (or Reporting) Entity that correctly applied one of the approved counting methods set forth in 45 CFR 153.405(d) through (g) cannot request to change its Annual Enrollment Count method after the reporting deadline for the applicable benefit year, Monday, November 16, 2015.

• However, a Contributing (or Reporting) Entity may request a refund within 90 days of its original Form submission if the misreporting relates to: (a) misapplying an allowable counting method; or (b) including exempt individuals in the enrollment count.

• The 90-day deadline does not apply when a Contributing (or Reporting) Entity requests a refund because it has paid reinsurance contributions more than once for the same covered life.
To request a refund within the applicable timeframe, Contributing Entities must:

- Email reinsurancecontributions@cms.hhs.gov.
- Provide details regarding the discrepancy discovered, including the amount of overpayment and the method used to determine there was an overpayment.
- Follow the instructions provided in the CMS response.
Discrepancy Scenario #5: Supporting Documentation Format Discrepancy

<table>
<thead>
<tr>
<th>Discrepancy</th>
<th>The Supporting Documentation was rejected due to a formatting discrepancy</th>
</tr>
</thead>
</table>
| Resolution  | 1) Update the Supporting Documentation so that it is in the correct .CSV format.  
                      2) Duplicate the Form (note the Pay.gov Tracking ID).  
                      3) Select Resubmission as the Type of Filing.  
                      4) Enter the Previous Pay.gov Tracking ID.  
                      5) Upload the updated Supporting Documentation. |

* Type of Filing
  - New
  - Re-Filing
  - Resubmission
  - Invoice
Next Steps

NOW

• Complete the 2015 ACA Transitional Reinsurance Program Annual Enrollment and Contributions Submission Form by the Monday, November 16, 2015 filing deadline.
• Contact your bank to remove ACH debit blocker.
• Review filings and if necessary, make updates and corrections.
• Review your REGTAP emails for updates (https://www.regtap.info/).
• For questions regarding Contributions, please contact us at reinsurancecontributions@cms.hhs.gov.

LATER

• Respond promptly to all Action Required emails from CMS.
### Where Can I Go for More Information?

<table>
<thead>
<tr>
<th>2015 Module Title</th>
<th>Content</th>
</tr>
</thead>
</table>
| **Module 1: Transitional Reinsurance Program Contributions Overview for 2015 Benefit Year** | • Defines a Contributing Entity in 2015  
• Summarizes exempted organizations in 2015  
• 2015 Uniform Contribution Rate  
• 2015 Key Deadlines  
• Provides an overview of the 2015 submission process |
| **Module 2: 2015 Reinsurance Contributions Counting Methods Overview**             | • Defines a Contributing Entity in 2015 and defines major medical  
• Provides a walk through of each Counting Method  
• Consistency Requirements and Aggregation  
• Calculation of Contribution Amounts  
• 2015 Key Deadlines |
| **Module 3: 2015 Reinsurance Contributions Program Form Completion, Submission, and Payment** | • Provides an overview of the 2015 submission process  
• Notable Updates for the 2015 Benefit Year  
• Data needed to complete the Form for the 2015 Benefit Year  
• Registering on Pay.gov  
• Provides a walk through of the 2015 ACA Transitional Reinsurance Program Annual Enrollment and Contributions Submission Form |
Where Can I Go for More Information? (continued)

<table>
<thead>
<tr>
<th>Resource</th>
<th>Type/Location</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>2015 Reinsurance Contributions Form Completion, Submission, and Payment WBT</strong></td>
<td>Web-based training to explain how to complete the 2015 Form</td>
</tr>
<tr>
<td><strong>2015 Transitional Reinsurance Form Quick Start Guide</strong></td>
<td>Provide instructions on completing the 2015 Form</td>
</tr>
</tbody>
</table>
| **Special Topic: Successful Completion of 2015 Reinsurance Contributions Supporting Documentation (.CSV file) Four or More Contributing Entities** | • Who is Required to Submit Supporting Documentation (.CSV file)?  
  • What Information is Needed to Complete Supporting Documentation (.CSV file)?  
  • Tools Available to Create the Supporting Documentation (.CSV file)  
  • Key Deadlines and Next Steps                                               |
| **2015 Supporting Documentation Job Aid**                                 | Job aid tool posted on REGTAP and the CCIIO website to assist in the creation of the .CSV Supporting Documentation File |
| **2015 Supporting Documentation Job Aid Manual**                         | Manual posted on REGTAP and the CCIIO website to assist in the completion of the Job Aid Tool used to create the .CSV Supporting Documentation File |
| **2015 File Layout**                                                     | Document to explain the required data elements to create the .CSV Supporting Documentation File |
Upcoming 2015 Reinsurance Contribution Submission Hotline

- **Reinsurance Contribution Submission Hotline**: CMS will host a hotline to assist contributing (or reporting) entities in completing the 2015 ACA Transitional Reinsurance Program Annual Enrollment and Contributions Submission Form. This hotline will be open Q&A during the dates and times specified below. All entities dialed into the hotline can benefit from questions asked and answered.

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monday, October 26, 2015</td>
<td>1:00 p.m. – 2:30 p.m. ET</td>
</tr>
<tr>
<td>Wednesday, October 28, 2015</td>
<td>1:00 p.m. – 2:30 p.m. ET</td>
</tr>
<tr>
<td>Wednesday, November 4, 2015</td>
<td>1:00 p.m. – 2:30 p.m. ET</td>
</tr>
<tr>
<td>Thursday, November 5, 2015</td>
<td>1:00 p.m. – 2:30 p.m. ET</td>
</tr>
<tr>
<td>Monday, November 9, 2015</td>
<td>8:00 a.m. – 6:00 p.m. E.T.</td>
</tr>
<tr>
<td>Tuesday, November 10, 2015</td>
<td>8:00 a.m. – 6:00 p.m. E.T.</td>
</tr>
<tr>
<td>Wednesday, November 11, 2015</td>
<td>8:00 a.m. – 6:00 p.m. E.T.</td>
</tr>
<tr>
<td>Thursday, November 12, 2015</td>
<td>8:00 a.m. – 6:00 p.m. E.T.</td>
</tr>
<tr>
<td>Friday, November 13, 2015</td>
<td>8:00 a.m. – 6:00 p.m. E.T.</td>
</tr>
<tr>
<td>Monday, November 16, 2015</td>
<td>8:00 a.m. – 6:00 p.m. E.T.</td>
</tr>
</tbody>
</table>

**Access Information:**
Phone: 877-848-1919
Web: [https://regtap.webex.com/regtap/onstage/g.php?d=643910582&t=a](https://regtap.webex.com/regtap/onstage/g.php?d=643910582&t=a)
Questions?

To submit questions by phone:

- Dial ‘14’ on your phone’s keypad
- Dial ‘13’ to exit the phone queue

To submit questions by webinar:

- Type your question in the text box under the ‘QA’ tab
Resources
<table>
<thead>
<tr>
<th>Resource</th>
<th>Link/Contact Information</th>
</tr>
</thead>
</table>
## Resources

<table>
<thead>
<tr>
<th>Resource</th>
<th>Link/Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Registration for Technical Assistance Portal (REGTAP) - presentations, FAQs</td>
<td><a href="https://www.REGTAP.info">https://www.REGTAP.info</a></td>
</tr>
<tr>
<td>Registration and Form on Pay.gov</td>
<td><a href="https://pay.gov/paygov/">https://pay.gov/paygov/</a></td>
</tr>
</tbody>
</table>
The FAQ Database allows users to search FAQs by FAQ ID, Keyword/Phrase, Program Area, Primary and Secondary categories, and Publish Date.

FAQ Database is available at http://www.REGTAP.info
Users have the option to opt in or opt out of receiving notifications when first registering in REGTAP by checking or unchecking the box for “I would like to receive notifications.”

After initial registration, contact the Registrar at registrar@REGTAP.info, call (800) 257-9520, or submit an inquiry to www.REGTAP.info to change notification preference.
Closing Remarks