# Workers' Compensation Medicare Set-Aside (WCMSA) Attestation Enhancements Questions and Answers for Professional Administrators

Below are answers to questions asked at the WCMSA Electronic Attestation Enhancements webinar held on November 6, 2019 for Professional Administrators. The presentation from the webinar can be found on CMS.gov here - https://www.cms.gov/files/document/november-6-2019-workers-compensation-attestation-enhancement-webinar-presentation-corporate-users.pdf.

**Question 1:** What do I need to do if I want to use the Workers' Compensation Medicare Set Aside Portal (WCMSAP) to manage WCMSAs that were approved prior to the implementation of this change (October 2019)?

**Answer 1:** For established WCMSAs that were approved prior to October 2019, account administrators will need to register for a Professional Administrator account on the WCMSAP to manage those cases going forward. Information on how to register for a Professional Administrator account and requesting Case Access is available in the WCMSAP User Manual available here https://www.cob.cms.hhs.gov/WCMSA/assets/wcmsa/userManual/WCMSAUserManual.pdf.

**Question 2:** If my company already has a Corporate submission account, why do we need to sign up for a Professional Administrator account?

**Answer 2**: Corporate accounts on the WCMSAP are used for the submission of WCMSAs. The new Professional Administrator account is used for administration of approved WCMSAs. Only users with the new Professional Administrator account can submit attestation transactions or view the balance information for the case.

**Question 3:** Our company submits WCMSA approvals and handles professional administration of the WCMSA. Is the Authorized Representative (AR) for the submission the same as the AR for the Professional Administration?

**Answer 3:** The AR is the individual in the organization that has the legal authority to bind the organization to a contract and the terms of the Workers' Compensation Medicare Set-Aside Portal (WCMSAP) requirements and processing. The AR completes the initial steps in the registration process but is not provided with a login ID. The AR can be the same for both accounts if they meet the above requirement.

**Question 4:** For a Professional Administrator account, can the Authorized Representative (AR) be the account Manager (AM)?

**Answer 4:** No. This needs to be two separate individuals. The AR is the individual who has the legal authority to bind the organization to the contract. The AR will not be able to create a login ID for the WCMSAP. The AM will control the administration of the account and will be able to create a login ID to access the WCMSAP.

**Question 5:** What is the benefit of associating a case to my Professional Administrator account?

**Answer 5:** By associating a case to the Professional Administrator account you will be able to manage account designees access to a case, view balance information on the WCMSAP, upload account transaction files for WCMSAs administered, and download response files for each submitted file. This will assist Professional Administrators to reconcile WCMSA balances with the current balance as stored in the WCMSAP.

**Question 6:** I have a case number but cannot associate it to my new Professional Administrator account. Why?

**Answer 6:** If final settlement documentation has not been received, the Professional Administrator will not be able to associate with that case until the settlement documentation has been provided and validated. To submit final settlement documentation, the "Upload Documentation" button will be used to submit the required documentation.

**Question 7:** We administer thousands of MSAs, most of which are WCMSAs that were previously approved by CMS. Is there functionality to submit bulk attestations on a monthly basis for relevant anniversaries or only case by case?

**Answer 7:** The attestation functionality does allow for the submission of transactions of multiple cases at the same time. Please review the file layout requirements in the WCMSAP User Guide here https://www.cob.cms.hhs.gov/WCMSA/assets/wcmsa/userManual/WCMSAUserManual.pdf.

**Question 8:** What is the accepted format for the WCMSA file upload for transaction files?

**Answer 8:** The files must be in the Comma Separated Value (CSV) format. This means that each row in a file will contain one record of information. Each record will contain multiple data fields that will be separated by a specific character, most commonly a comma. To ensure the fields correspond from row to row, a comma must be included for every column listed in the record layout, even columns that do not have any data. The detailed record layout and field specifications are found in the WCMSAP user guide.

**Question 9:** Is there a test period prior to sending attestations through the portal?

**Answer 9:** There is no test period for this functionality. Users are recommended to send small initial files to ensure there are no issues prior to submitting full information. For additional information on case submission and case submission errors please reference the (WCMSAP) User Guide here https://www.cob.cms.hhs.gov/WCMSA/assets/wcmsa/userManual/WCMSAUserManual.pdf.

**Question 10:** Does an opening/beginning balance need to be supplied for all cases in order to submit transaction records?

**Answer 10:** No, beginning balances are only required for cases that were finalized prior to the implementation of this change, which was October 7, 2019. The opening balance will be systematically set for cases that were finalized after the implementation of this WCMSAP change.

**Question 11:** Who do I contact if I am the identified Professional Administrator for a case, but my submitted EIN does not match the EIN provided for the case?

**Answer 11:** Please contact the Benefits Coordination & Recovery Center (BCRC) to resolve this issue. BCRC CWF Analysts are available to assist you Monday through Friday, from 7:00 a.m. to 7:00 p.m., Eastern Time, except holidays, at 646-458-2255.

**Question 12:** Can Corporate submission accounts view attestations on the files they submitted for a WCMSA?

**Answer 12:** Access to the WCMSAP is based on account type and user role. Corporate submission accounts will not have access to the attestation area. In addition, a Professional Administrator will have a limited view of what can be seen on the WCMSAP. They will only be able to see balance information for cases they administer where the case has been linked to the account and where accounting records have been submitted for those cases.

**Question 13:** Is the signed Professional Administrator contract required to be included with the settlement documentation?

**Answer 13:** The Professional Administrator Agreement documents (Doc Type 30) are uploaded during new case creation by the submitter if they select "Professional Administrator as the administrator type. At submission, this should be an unsigned version of the administration agreement (or signed letter of intent on the administrator's letterhead) that will be updated at settlement with signatures. At a minimum, these must include contact information for the Professional Administrator (including EIN) and claimant identifying information.