



OFFICE OF THE ACTUARY

TO: Medicare Advantage & Prescription Drug Contract Year (CY) 2009
Plan Sponsors and Certifying Actuaries

FROM: Paul Spitalnic, Director
Parts C & D Actuarial Group, CMS Office of the Actuary

DATE: June 9, 2008

SUBJECT: CY2009 Initial Actuarial Certification Deadline

As part of the CY2009 bid submission requirements, an actuarial certification must be submitted, via the HPMS actuarial certification module, for every Bid Pricing Tool uploaded to HPMS. Certifying actuaries will be required to complete the certification process twice prior to bid approval—once in June and again in August—as discussed in Appendix A of the Bid Pricing Tool instructions. The actuarial certification module is now available and all initial certifications are to be completed by **June 18, 2008**. In August, we will announce the deadline for the certification of the final bid submission.

Please note that if a certification is not submitted via the HPMS actuarial certification module, the bid(s) will not be considered for CMS review or approval. Completing the actuarial certification is only one of the bid submission requirements. All other requirements must be completed or have been completed by the required deadlines in order for the bid to receive CMS consideration for approval.

We encourage actuaries to review the information uploaded to HPMS pertaining to the bids that they will certify. Any inconsistencies within the BPT, or between the BPT and the PBP, should be discussed with the plan sponsor before they are brought to the attention of CMS. Should any changes to submissions seem warranted, please contact Kevin Lyons at Kevin.Lyons@cms.hhs.gov as soon as possible. In your communication to CMS, you must clearly identify the specific issue(s) involved and explicitly indicate which component(s) of the bid submission are proposed to change (MA PBP, PD PBP, MA BPT, or PD BPT). You must demonstrate that the purpose of the request is to correct an error and the change is consistent with the original assumptions used to develop the bid before June 2, 2008. CMS will review resubmission requests on a case-by-case basis to evaluate the appropriateness of any proposed changes.

The following pages of this memo provide resources for additional information regarding the actuarial certification process and technical instructions for completing the HPMS certification module.

For Additional Information

For additional information on the CY2009 certification requirements and process, please refer to the following resources:

- Appendix A of the CY2009 MA and Part D Bid Pricing Tool Instructions, for more information on the actuarial certification requirements and process.
- Appendix B of the CY2009 MA and Part D Bid Pricing Tool Instructions, for supporting documentation requirements for reliance information.
- Chapter 5 of the CY2009 Bid User's Manual.
- CY2009 Bid Conference, available under:
http://www.cms.hhs.gov/apps/events/docs/Conference_ID_356/bidconference.html
- Memo released via HPMS on February 14, 2008 regarding the certification module access requirements.

For questions regarding the certification requirements, please contact CMS Office of the Actuary at actuarial-bids@cms.hhs.gov.

For questions regarding the resubmission of bids based on the actuarial certification review, please contact Kevin Lyons in the Office of the Actuary at Kevin.Lyons@cms.hhs.gov.

For questions regarding HPMS access to the actuarial certification module, please contact Sara Walters at sara.walters@cms.hhs.gov.

For technical questions or problems regarding the certification module, please contact the HPMS Help Desk at 1-800-220-2028 or hpms@cms.hhs.gov.

Technical Instructions for Completing the CY2009 Actuarial Certification Module
Prepared by CMS, as of May 21, 2008

Step 1: Accessing the HPMS actuarial certification module.

To access HPMS, you need a valid user id and password.

Step 1a: Open the web browser (e.g., Internet Explorer) and enter the CMS SSL VPN gateway address <https://gateway.cms.hhs.gov> in the Address bar.

Step 1b: Enter your User ID, Password and select HCFA.GOV from the Login Service drop down menu. Click the Logon button to proceed.

Step 1c: Select the “HPMS” link to access the HPMS Home Page.

Step 1d: To access the HPMS Actuarial Certification Module, click on the following path: HPMS Home > Plan Bids > Bid Submission > CY2009 > Upload > Actuarial Certification

For any technical problems accessing HPMS, contact the HPMS Help Desk at 1-800-220-2028 or hpms@cms.hhs.gov

Step 2: Selecting bid(s) to certify.

The first screen of the certification module contains a list of contracts for which you have access to certify. If a contract that you will be certifying is not included on the list, please contact Sara Walters at sara.walters@cms.hhs.gov

You can select plans by either contract number or parent organization name. The number in parenthesis, after each contract/parent name, refers to the number of bids that are awaiting certification.

From the list of plans, select one or more plans that you would like to certify. Note that if you select multiple plans, then the certification language entered will apply to all bids selected. Click “Next” button.

Step 3: Review standardized certification language.

The certification module contains standardized language that will apply for all CY2009 certifications submitted to CMS. The standardized language is consistent with the requirements contained in Appendix A of the CY2009 Bid Pricing Tool Instructions.

Step 4: Enter any (optional) additional text, to be appended to the standardized language.

Actuaries are permitted to enter additional text to the standardized certification language. Any text entered will be applied to *all* bids selected to be certified. (Technical note: Additional comments are limited to 4,000 characters).

Additional text is not required to complete the certification. The actuary may choose to enter additional text at their discretion. CMS Office of the Actuary will review any additional text entered in the certification.

Step 5: Select the specific Bid Pricing Tools (MA and/or Part D) that the certification applies to.

The certification may apply to either the MA Bid Pricing Tool, the PD Bid Pricing Tool, or both. Use the check boxes at the bottom of the screen to indicate whether the certification applies to the MA BPT, the PD BPT, or both.

Note: User access is at the contract-level. Therefore, actuaries will have access to certify all bids within a contract for which they have been identified as a certifying actuary. They will also have access to both the MA and PD components of the bids. **Actuaries should only check the boxes of the bid components that they intend to certify.**

The certification module summarizes some high-level information pertaining to the bids selected. The screen includes the bid upload date, HPMS version # assigned to that upload, Standardized Part D Bid, Total MA Rebates, and Total MA Premium.

The module also includes links to each bid's BPTs and PBPs. We encourage actuaries to review the uploaded information pertaining to the bids that they are certifying.

Click "Next" button.

Step 6: Review Certification to be submitted

This screen contains the information entered on the previous screen. It contains the standardized certification language, any additional text appended to the standardized language, the list of BPT(s) that the certification will apply to, the name and user ID of the certifier, and the date/time of the certification.

Step 7: Save a copy of the certification for your records.

After reviewing the certification, click on the "Create PDF" link at the top right corner of the screen. Save the PDF file to your computer, for your records.

Then click on the "Back" button to return to the submission screen.

Step 8: Submit certification.

Click "Submit" button to submit the certification to CMS.
Click "OK" to confirm submission.

You will be returned to the initial screen to select additional contracts to certify. Follow Steps 2 through 8 for any additional certifications to be submitted for other plans.

Additional information regarding the actuarial certification process:

- The certification module can be completed by two different actuaries for the MA BPT versus the PD BPT. Also, different actuaries can submit certifications for specific plans under a contract (for example: plan 001 can be submitted by ActuaryA, and plan 002 can be submitted by ActuaryB).
- The certification applies to a specific upload version of the bid. If a resubmission occurs during the bid review process, then the submitted certification does not automatically apply to the newly uploaded version. The certification module will be available for the newly resubmitted version of the bid; however certifications are not required for interim resubmissions. The final bid submission (after the National Average rebate reallocation period in August) will require a certification. A separate announcement will include the deadline for final actuarial certifications.
- After submitting the initial certification in June, the HPMS system will store any “additional text” entered in the certification module. Next to the text box for additional information, you will see a “Reuse Existing Certification Language” section.
- Between the initial June certification and the final August certification, no substantive changes to the “additional” certification language entered by the actuary will be considered without prior permission from CMS Office of the Actuary. The initial actuarial certification language submitted will be considered the definitive certification language, unless specific changes are requested by OACT. Any changes to the certification language would require prior permission from OACT, including changes or additions to any qualifications.
- If a certification is not submitted via the HPMS actuarial certification module, the bid(s) will not be considered for CMS review/approval.
- Every MA BPT requires a certification. Every Part D BPT requires a certification. Since Part D BPTs are not completed for “800-series” employer bids, no actuarial certification is required. However, a certification is required for “800-series” employer MA bids.
- If you inadvertently submitted a certification for a plan that you did not intend to certify, please contact the HPMS Help Desk at 1-800-220-2028.
- See Appendix B of the CY2009 MA and Part D Bid Pricing Tool Instructions, for supporting documentation requirements for reliance information. Note that the reliance information must now be provided as part of the supporting documentation upload.