



**CENTERS FOR MEDICARE & MEDICAID SERVICES**

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**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:** August 21, 2008

**SUBJECT:** CY2009 Final 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 were required to complete the initial certification process in June and are now required to complete the final certification process, as discussed in Appendix A of the Bid Pricing Tool instructions. The actuarial certification module is now available and all final certifications are to be completed by **August 27, 2008**.

If no resubmission occurred during the bid review process, such that the HPMS upload version number of the plan that is currently in HPMS is the same version number as originally certified in June, then the original certification will be considered the final certification and no additional certification is required at this time. However, if a resubmission occurred during the bid review process — for either PBP or BPT issues — then a final certification must be submitted by the deadline. Even if no BPT changes occurred during those resubmissions, a final certification is still required since the HPMS upload version number has changed. The HPMS version number is displayed in the certification module for each bid.

CMS will not approve bids without a final certification submitted via the HPMS actuarial certification module. 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 brought to the attention of CMS immediately.

No material changes to the previously submitted certification language will be considered unless directly requested by CMS. If changes were requested by CMS, these issues **must**

be addressed. These guidelines must be followed in order for the bid to receive CMS approval.

The actuary who certified the original bid in HPMS should be the same actuary who signs off on the final certification. However, if for some reason this actuary is not available, (i.e. no longer at the company, etc.) another qualified actuary may certify the bid as long as no additional qualifying text is appended to the certification.

The remainder 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 background information on the CY2009 certification process, please refer to the following resources:

- Appendix A of the CY2009 MA and Part D Bid Pricing Tool Instructions.
- Chapter 9 of the CY2009 Bid Submission User's Manual.
- CY2009 Bid Conference Webcast.
- June 9<sup>th</sup> memo released via HPMS regarding the initial actuarial certification requirements
- February 14<sup>th</sup> memo released via HPMS regarding the certification module access requirements.

For questions regarding the certification requirements, please contact Kevin Lyons in the CMS Office of the Actuary at [kevin.lyons@cms.hhs.gov](mailto:kevin.lyons@cms.hhs.gov).

For questions regarding HPMS access to the actuarial certification module, please contact Sara Walters at 410-786-3330 or [sara.walters@cms.hhs.gov](mailto:sara.walters@cms.hhs.gov).

For technical questions or problems with the certification module, please contact the HPMS Help Desk at 1-800-220-2028 or [hpms@cms.hhs.gov](mailto:hpms@cms.hhs.gov).

## **Technical Instructions for Completing the Actuarial Certification Module in HPMS**

Prepared by CMS, as of August 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](mailto: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. If a contract that you will be certifying is not included on the list, please contact Sara Walters at 410-786-3330 or [sara.walters@cms.hhs.gov](mailto: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:** If requested by CMS, edit any additional text appended to the standardized language.

Actuaries were permitted to enter additional text to the standardized certification language during the initial certification.

However, during the final certification, no changes to the additional text are permitted unless they are directly requested by CMS. If CMS has requested changes to the appended text, the changes **must** be addressed. Any text entered will be applied to *all* bids selected to be certified. (Technical note: Additional comments are limited to 4,000 characters).

CMS Office of the Actuary will review any additional text entered in a 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.

Actuaries will have access to certify all bids within a contract for which they have been identified as a certifying actuary. **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 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 plans to certify. Follow Steps 2 through 8 for any additional certifications to be submitted for other plans.

**Additional information regarding the certification module and 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. The final bid submission requires a certification.
- After submitting the initial certification in June, the HPMS system has stored 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 were 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 final 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 no Part D BPT was completed for any “800-series” employer bid, no actuarial certification is required. 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 Kevin Lyons at [kevin.lyons@cms.hhs.gov](mailto:kevin.lyons@cms.hhs.gov).
- See Appendix B of the CY2009 Bid Pricing Tool instructions, for supporting documentation requirements for reliance information.