CMS Fall Conference
September 2010

➢ Retroactive Enrollment Process
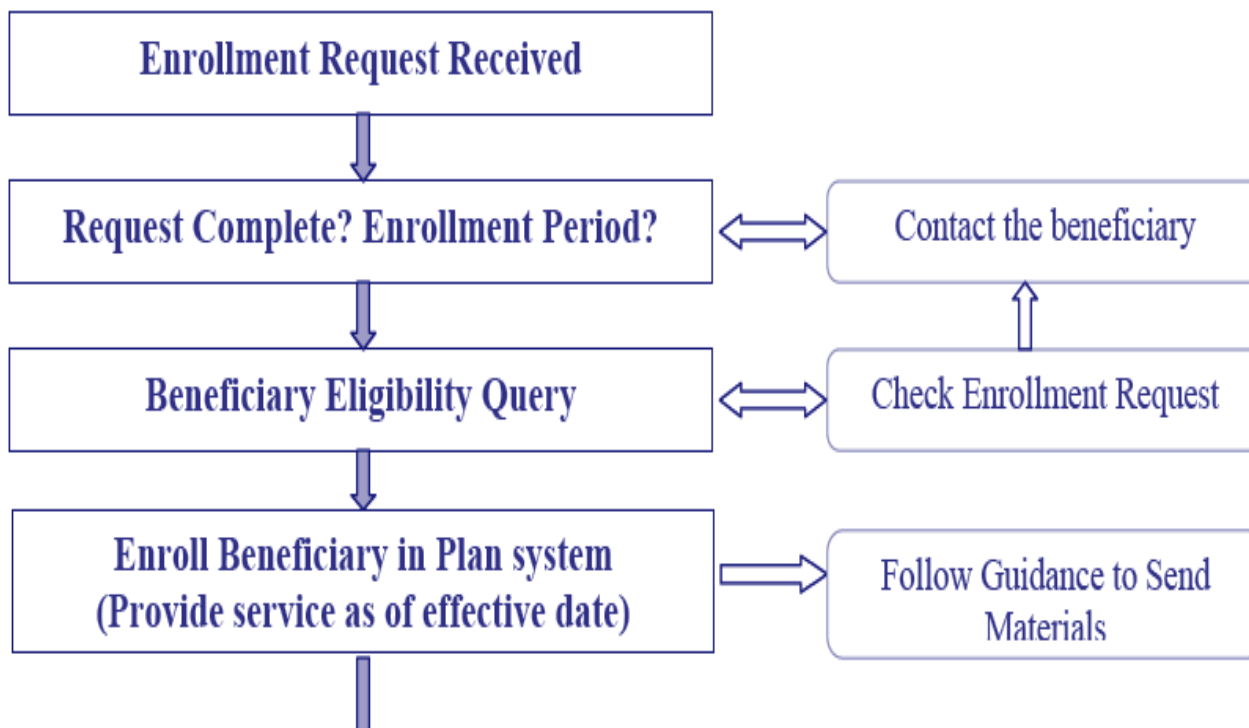
➢ Division of Prospective Payment

Agenda

- Enrollment Process: General Overview
- Definition of Retroactive Request
- How to Submit to the Retroactive Processing Contractor (RPC)
- RPC Process Changes
- Improvement Opportunities
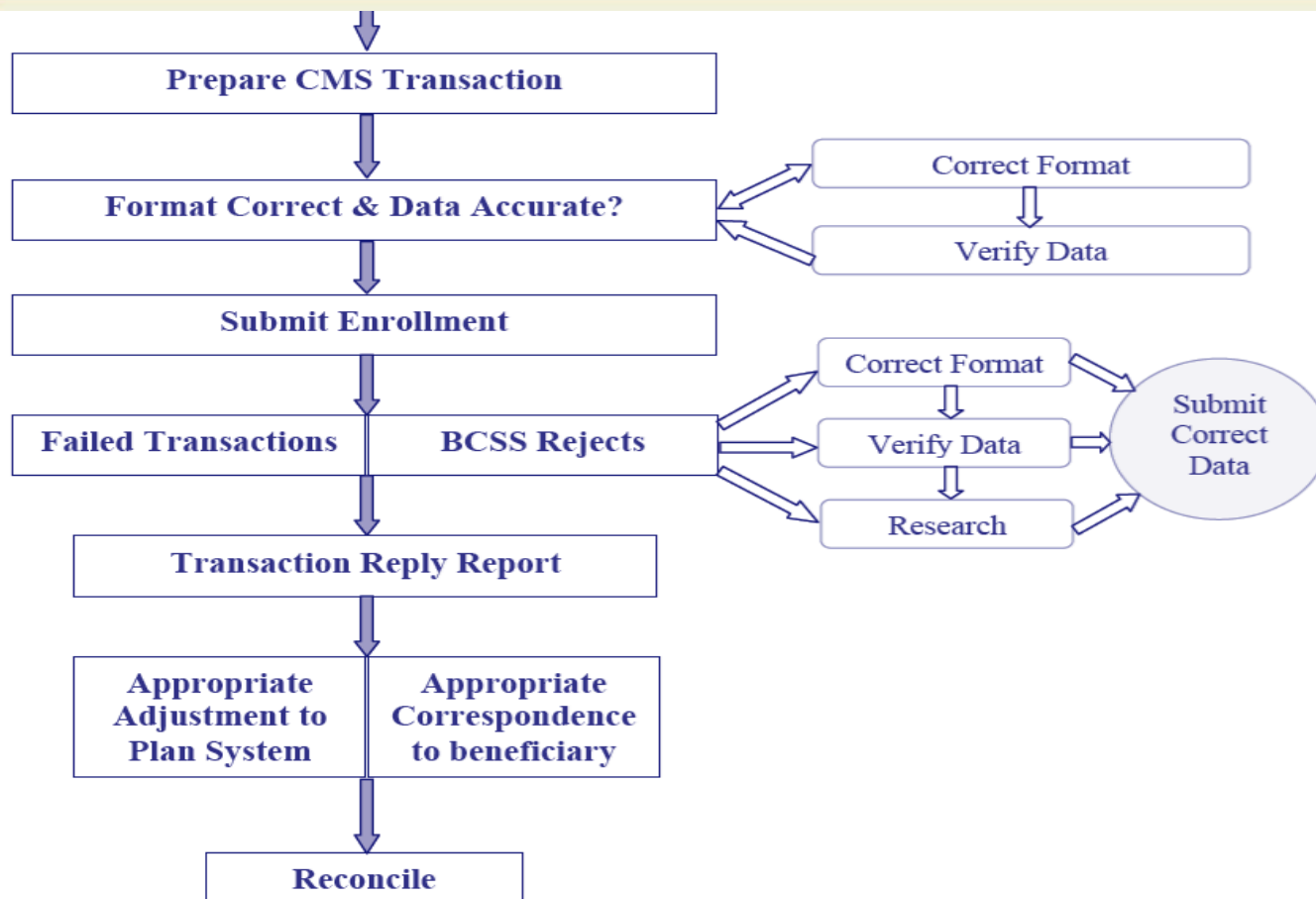- RPC Post MARx R & M

Enrollment Process

- Prepare CMS transactions for submission
- Submit transactions
- Review Batch Completion Status Summary (BCSS)
- Transaction Reply Reports (TRR), etc.

Enrollment Process: Submission

EXAMPLE ENROLLMENT PROCESS

Enrollment Process: Submission

Enrollment Process

- Reconcile after every submission
  - Use the BCSS to identify rejections and failures
  - Correct your errors and resubmit within CPM
- Data Quality
  - Compare what you believe you sent to what was actually submitted
- Review the TRR
  - Another opportunity to correct and resubmit
  - Includes CMS generated actions that you must react to
  - This is not optional

Enrollment Process

- Review your monthly reports
- Internal quality checks
  - Develop a quality assurance plan
  - How do you ensure consistency?
- Better internal quality checks mean fewer manual corrections
- When necessary, submit to CMS Retro Processing Contractor

What is a Retroactive Request?

- CMS has 3 categories of retroactivity, as defined in the February 24, 2009 HPMS memo

    - Category 1 requests represent normal business processes that organizations may address through the MAPD Help Desk
    - Category 2 requests represent normal business processes that organizations may address through the RPC
    - Category 3 requests require organizations to obtain approval from their CMS Regional Office Account Manager (AM) prior to submitting requests to the RPC

Category 2 Cases

- Qualifying action or event reported by CMS to an organization via TRR/MMR within the last 3 months

- Corrections for an effective date, due to a recent erroneous CMS action against a member (e.g., erroneous death indicator)

- Employer Group/Union Health Plans (EGHPs)

- CTM complaints

Category 3 Cases

- Effective dates for the current calendar month, minus 3 more months, are classified as Category 3
- RO Approval Letter **only** waives the timeliness requirement
  - Submission must reconcile with RO approval
  - Docs still required
  - One submission per RO approval; not piecemeal

Retroactive Submissions

- The Retroactive Processing Contractor Processes
  - Retroactive enrollments/disenrollments
    - PBP Change Enrollments
    - Segment Changes
    - Reinstatements
  - Payment Validation Adjustments
    - SCC & ESRD Changes
    - Medicaid Changes
    - LIS Updates

Retroactive Enrollments & PBP Changes

- Types of Retroactive Enrollment
  - Standard Enrollment – During a Valid Election Period
  - Employer Group/Union Health Plan (EGHP)
  - Enrollment Corrections
  - PACE Enrollments – Refer to December 24, 2009 HPMS memo
- Types of Retroactive PBP Changes:
  - Residence Change
  - Bene Elected PBP Change
  - PBP Correction for an Original Enrollment

Retroactive Disenrollments

- Types of Retroactive Disenrollments:
  - True Disenrollments
    - Voluntary Disenrollment
    - Involuntary Disenrollment
  - Corrections/Plan Errors

Reinstatements

- Reinstatements due to mistaken disenrollment made by the member

- Reinstatement for disenrollment due to erroneous death indicator or erroneous loss of Part A and/or Part B

- Reinstatement due to a member's involuntary disenrollment by an organization (e.g., plan error)

Payment Validation Adjustments

- Plans should submit a retroactive payment adjustment when they identify a discrepancy on their MMR or TRR

- Plans should submit within 45 days of receiving their monthly reports

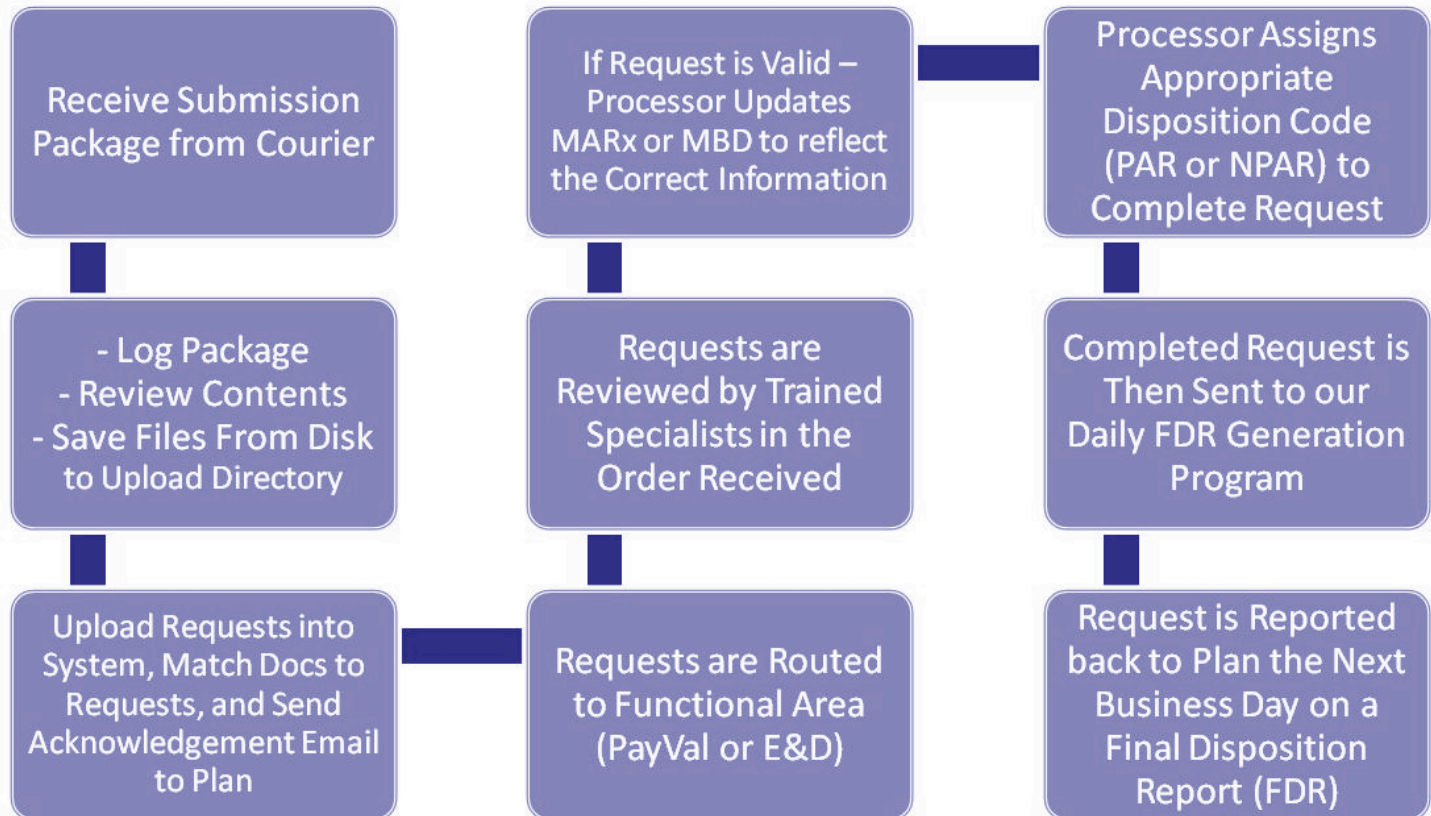- Plans should retain all documentation supporting the request, as required by CMS guidance

Over 6 & Quality Reviews

- Over 6 Requests – Payment validation requests with an effective date greater than 6 months from the RPC received date
  - Upfront documentation is required for all "Over 6" requests
- Quality Reviews (formerly known as Probe Studies) – each month, a 5% sample of payment validation requests is selected for review

How to Submit Retro Requests

- Submission spreadsheet
  - Separate spreadsheet for Category 2 & 3
  - Macro function validates data
- Documentation Worksheet
  - Required for each request
  - Provide detailed explanation, especially for plan errors
  - Select the appropriate request type and election period
  - Include appropriate documentation (i.e., enrollment form, continue to use letter, etc.)

RPC Process Flow

Receive Submission Package from Courier

- Log Package
- Review Contents
- Save Files From Disk to Upload Directory

Upload Requests into System, Match Docs to Requests, and Send Acknowledgement Email to Plan

Requests are Routed to Functional Area (PayVal or E&D)

Requests are Reviewed by Trained Specialists in the Order Received

If Request is Valid – Processor Updates MARx or MBD to reflect the Correct Information

Processor Assigns Appropriate Disposition Code (PAR or NPAR) to Complete Request

Completed Request is Then Sent to our Daily FDR Generation Program

Request is Reported back to Plan the Next Business Day on a Final Disposition Report (FDR)

RPC Process Changes

- Upcoming Changes/Releases:
  - Documentation Worksheet
    - Telephonic enrollments
    - TRC 127 Process
- RPC Retroactive Processing SOP
  - Clarify RPC guidance on CTM transactions
- RPC Submission Spreadsheet
  - Update election periods
  - Enhanced validation functionality

Improvement Opportunities

- Validate data before submitting
- Review Upload Error Reports timely
- Review Final Disposition Reports (FDRs) timely
- Submit all RO Approvals together – not piecemeal
- Provide detailed explanation on Documentation Worksheet, especially for Plan Errors

Improvement Opportunities (cont.)

- Include a signed cover letter with an attestation statement with every submission
- Submit all requests for all contracts and record types on the same Excel file, if possible
- Provide an Election Period for all applicable requests
- Use the same password for the Submission Spreadsheet and FDRs
- Cure rejected requests before resubmitting – if unsure, contact Client Services

RPC Post MARx R & M

- Quality Reviews
  - Plan Submitted Transactions
    - Each month a random sample of plan transactions submitted via the Plan UI will be selected for review
    - UI access will be revoked for any plan that fails the quality review
- Data Analysis
  - Perform data analysis to identify enrollment trends
    - # of rejected TRCs by Parent Org.
    - # of duplicate enrollments/disenrollments

Contacts

- RPC Submission questions: Client Services at clientservices@reedassociates.org or

  (402) 315-3660

- Policy/Guidance questions: Your Account Manager

Questions???