



Commercial Repayment Center (CRC) Group Health Plan (GHP) Recovery Town Hall Questions and Answers

Below are answers to commonly asked questions from the CRC GHP Recovery Town Hall held on January 14, 2020. The presentation from the town hall can be found on CMS.gov here: <https://www.cms.gov/files/document/commercial-repayment-center-crc-group-health-plan-ghp-recovery-town-hall-presentation.pdf>.

Question 1: Where do I find guidance on what is acceptable documentation for a defense?

Answer 1: The GHP Valid Defense Instructions download can be found on the Group Health Plan Recovery page on CMS.gov here: <https://www.cms.gov/Medicare/Coordination-of-Benefits-and-Recovery/Coordination-of-Benefits-and-Recovery-Overview/Group-Health-Plan-Recovery/Group-Health-Plan-Recovery>.

Question 2: We used to receive a report showing all open demands. Can we still receive this information?

Answer 2: The CRC can send an open debt report that lists all unresolved demands. If you would like to receive this report, please reach out to your CRC Outreach point of contact or direct queries to the CRC Outreach Team at CRCOutreachteam@performantcorp.com.

Account Managers in the Registered Commercial Repayment Center Portal (CRCP) will receive an email notification when a new demand letter has been added to your Demand Listing Page.

Question 3: Why would a defense response and an Intent to Refer letter (ITR) be sent within days of each other?

Answer 3: The ITR letter is automatically issued no less than 60 days prior to potential referral to the Department of Treasury on any outstanding balance for the debt. It is possible to receive a defense response and an ITR letter in close proximity to each other if your defense was reviewed concurrently with the automatic generation of the ITR letter.

Question 4: Why would the Department of Treasury have a different address on file for us than the one the CRC has?

Answer 4: In most cases, the Department of Treasury will use the address that is provided by the insurer to CMS via the Medicare, Medicaid, and S-CHIP Extension Act (MMSEA) Section 111 reporting. However, in some instances the Department of Treasury will use other addresses it deems appropriate to contact the debtor.

Question 5: How do we ensure that the Department of Treasury is using the correct Tax Identification Number (TIN)?

Answer 5: The TIN used by the Department of Treasury will be the one reported by the insurer to CMS via MMSEA Section 111 reporting.

Question 6: What check information needs to be included on the defense?

Answer 6: If remitting payment with your defense, the CRC Case ID and/or Medicare ID needs to be included on the check or check stub. The following information should also be included within the defense: check number, check date, check amount and amount that should be applied to the case.

Question 7: Is it possible to receive a list of all demands forwarded to the Department of Treasury for a particular employer/insurer combination?

Answer 7: Yes, please contact the CRC Outreach Team at CRCO Outreachteam@performantcorp.com.

Question 8: Is there a way to request an extension if we are receiving hundreds of demands at a time so that they aren't referred to the Department of Treasury?

Answer 8: No, the requirements for the Department of Treasury are in statute and the CRC is required to refer debts to Treasury within 120 days of delinquency.

Question 9: How do I make a payment for a GHP debt?

Answer 9: Registered CRCP users can submit electronic payment via the CRCP. Further information about the electronic payment option can be found in the CRCP User Guide (Section 9.3 - Make a Payment) here: <https://www.cob.cms.hhs.gov/CRCP/assets/crcp/userManual/CRCPUserManual.pdf>.

You may also submit payment by mail. Be sure to include the CRC Case ID and/or Medicare ID and send your check to the remittance address listed on the demand letter.

Question 10: When remitting payment and submitting a defense, which is later deemed fully valid, is there a way to get the payment issued as a refund?

Answer 10: If there is no other open debt for the same employer/insurer combination, any excess collections will be refunded automatically.

Question 11: If I have a case specific question, who should I contact?

Answer 11: You can contact the CRC Contact Center at (855) 798-2627 (TTY/TDD: 1-855-797-2627 for the hearing and speech impaired.) After selecting your language preference, select “4” to reach the CRC. You can also use the CRCP to find out the status of a case.

Question 12: If we feel that there is an issue with a defense response, who should we contact?

Answer 12: The first step would be to contact the CRC Contact Center at (855) 798-2627 (TTY/TDD: (855) 797-2627 for the hearing and speech impaired.) After selecting your language preference, select “4” to reach the CRC. They will review the documentation received, advise the caller of next steps and escalate if necessary.

Question 13: I have contacted the CRC Contact Center but was unable to get my question answered or my problem resolved, what should I do?

Answer 13: If you are unable to resolve an issue through the CRC Contact Center, please contact your CRC Outreach point of contact or direct queries to the CRC Outreach Team at CRCO outreachteam@performantcorp.com.

Question 14: Who should I contact with questions regarding use of the CRCP?

Answer 14: Please contact the Benefits Coordination and Recovery Center (BCRC) Electronic Data Interchange (EDI) Department at (646) 458-6740 or by email at COBVA@GHIMedicare.com.

Question 15: Who should I contact if I have a question/problem with information I've reported through Section 111?

Answer 15: Please contact the BCRC EDI Department at (646) 458-6740 or by email at COBVA@GHIMedicare.com.