User Group Regarding the Reinsurance Contribution Submission Process: Submission of Enrollment Counts, Supporting Documentation, and Contributions through Pay.gov

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Payment Policy & Financial Management Group,
Division of Reinsurance Operations

CMS
CENTERS FOR MEDICARE & MEDICAID SERVICES

HTTPS://WWW.REGTAP.INFO

Session Guidelines

- This is a sixty-minute session
- Address common questions regarding the Reinsurance Contribution Submission Process through Pay.gov
- After the presentation, we will take your questions

Purpose and Objectives

- Review common questions regarding the reinsurance contribution submission process through Pay.gov
- Respond to questions related to the submission of enrollment counts, supporting documentation and contributions through Pay.gov

Overview of the Transitional Reinsurance Program

- The Transitional Reinsurance Program is established by Section 1341 of the Affordable Care Act (ACA) to help stabilize premiums in the individual market
- Reinsurance contributions are required for the 2014, 2015 and 2016 Benefit Years
- The program is funded by contributions collected from health insurance issuers and certain self-insured group health plans to cover costs for high-cost individuals enrolled in non-grandfathered reinsurance-eligible individual market plans

What Are the Key Deadlines for the 2014 Benefit Year?

Date	Activity	Contribution Amount
No later than November 15, 2014	Submit Annual Enrollment Count and Schedule Contribution Payment Date	
No later than January 15, 2015	Remit first Contribution Amount	$52.50 per covered life
No later than November 15, 2015	Remit second Contribution Amount	$10.50 per covered life
	Total	$63.00 per covered life

When Should I Schedule My Reinsurance Contribution Payment?

- We request that you schedule your contribution payment(s) at least 30 days after the day you submit the Form, but before the applicable regulatory deadline(s)
  - This will allow for validation and correction if necessary
- Here is an example for a combined collection:



= selected Form submission date

= selected payment date

= regulatory deadline(s)

When Would Multiple Forms and Supporting Documentation Be Submitted?

- It is possible that a reporting entity may need to submit more than one Form and potentially, more than one Supporting Documentation
- Potential scenarios if the reporting entity:
  1. Wants to follow the two-payment schedule (not a Combined Collection)
  2. Has more enrollees than would be permitted for a single transaction on Pay.gov
  3. Wants to use more than one bank account
  4. Has a business reason for wanting to complete multiple Forms

Scenario 1: Submitting Multiple Forms

- A reporting entity wants to make two separate payments (not a Combined Collection)
  - If this is the case, the reporting entity would:
    - Submit the Form and Supporting Documentation and schedule the first payment date
    - Duplicate the Form and submit the **same** Supporting Documentation to schedule the second payment date
      - To complete the reinsurance contribution submission process, both payments **MUST** be scheduled by November 15, 2014

Scenario 2: Submitting Multiple Forms

- A reporting entity is submitting more than 1,587,301.58 covered lives when remitting a Combined Collection or 1,904,761.90 covered lives when remitting a two-part collection
  - If this is the case, the reporting entity will have to divide the covered lives between more than one Form and Supporting Documentation
  - A reporting entity should review its Gross Annual Enrollment Count prior to starting the process to determine if multiple Forms and Supporting Documentation will need to be submitted

Scenario 3: Submitting Multiple Forms

- A reporting entity wants to use more than one bank account for submission of contributions
  - If this is the case, the reporting entity will complete a separate Form and Supporting Documentation per bank account
    - Therefore, the information on each Form and corresponding Supporting Documentation should only include the data related to the selected bank account

Scenario 4: Submitting Multiple Forms

- A reporting entity has a business reason for wanting to complete multiple Forms
  - If this is the case, the reporting entity must be sure that the annual enrollment count on the Form and on the Supporting Documentation match

What is an ACH Debit Block?

- Automatic debits to your business account may be blocked by the bank
  - This security feature is called an ACH Debit Block, ACH Positive Pay or ACH Fraud Prevention Filter
- ACH Debit Block works by having an allowed list of ACH company IDs
  - The list enables allowable automatic debits
- When working with the US Government these company IDs are referred to as the Agency Location Code or the ALC+2 value
- **You must contact your bank to have the ALC+2 value added**
- For the Reinsurance Contribution process the ALC+2 is **7505008015**

Questions?

To submit questions by phone:

- ❑ dial ‘14’ on your phone’s keypad
- ❑ dial ‘13’ to exit the phone queue

To submit questions by webinar:

- ❑ type your question in the text box under the ‘QA’ tab

Resources

HTTPS://WWW.REGTAP.INFO

Regulatory References

This list of regulatory references offers additional information and details on the Transitional Reinsurance Program.

- Standards Related to Reinsurance, Risk Corridors and Risk Adjustment (77 FR 17220) provided a regulatory framework
  - http://www.gpo.gov/fdsys/pkg/FR-2012-03-23/pdf/2012-6594.pdf
- HHS Notice of Benefit and Payment Parameters for 2014 (78 FR 15410)
  - http://www.gpo.gov/fdsys/pkg/FR-2013-03-11/pdf/2013-04902.pdf
- Program Integrity: Exchange, Premium Stabilization Programs, and Market Standards (78 FR 65046) established oversight standards
  - http://www.gpo.gov/fdsys/pkg/FR-2013-10-30/pdf/2013-25326.pdf
- HHS Notice of Benefit and Payment Parameters for 2015 (78 FR 13744) provided a split collection process
  - http://www.gpo.gov/fdsys/pkg/FR-2014-03-11/pdf/2014-05052.pdf
- Exchange and Insurance Market Standards for 2015 and Beyond (79 FR 30240)
  - http://www.gpo.gov/fdsys/pkg/FR-2014-05-27/pdf/2014-11657.pdf

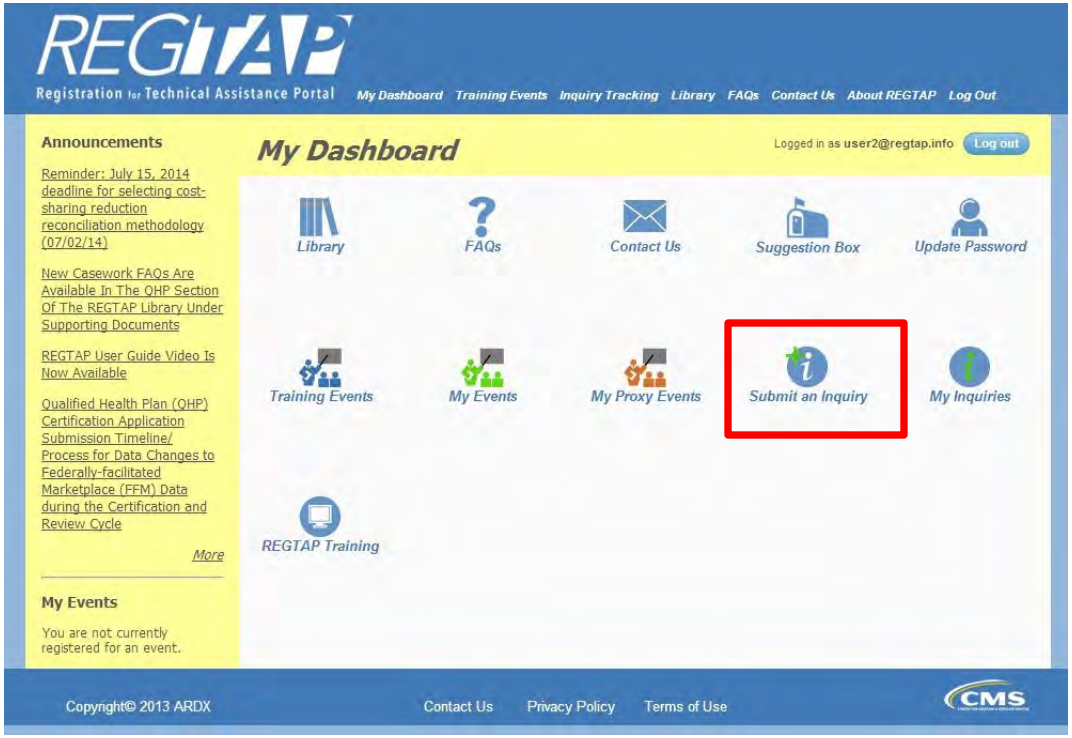
Resources

Resource	Link/Contact Information
U.S. Department of Health & Human Services	http://www.hhs.gov/
Centers for Medicare & Medicaid Services (CMS)	http://www.cms.gov/
The Center for Consumer Information & Insurance Oversight (CCIIO) web page	http://www.cms.gov/cciio
Registration for Technical Assistance Portal (REGTAP) - presentations, FAQs	https://www.REGTAP.info
Pay.gov	https://pay.gov/paygov/
The Transitional Reinsurance Program – Reinsurance Contributions Webpage	http://www.cms.gov/CCIIO/Programs-and-Initiatives/Premium-Stabilization-Programs/The-Transitional-Reinsurance-Program/Reinsurance-Contributions.html

Inquiry Tracking and Management System (ITMS)

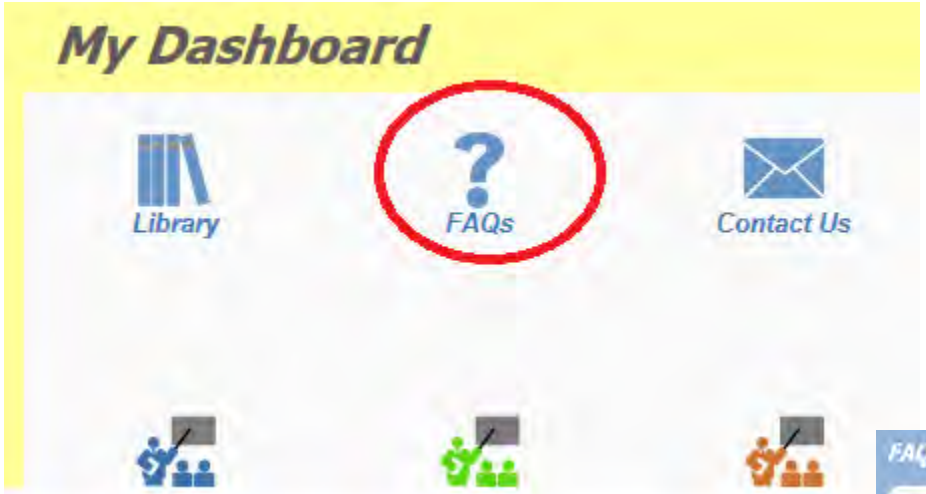
ITMS is available at https://www.REGTAP.info

Users can submit questions after the User Group by selecting "Submit an Inquiry" from My Dashboard.



Note: Enter only one (1) question per submission.

FAQ Database on REGTAP



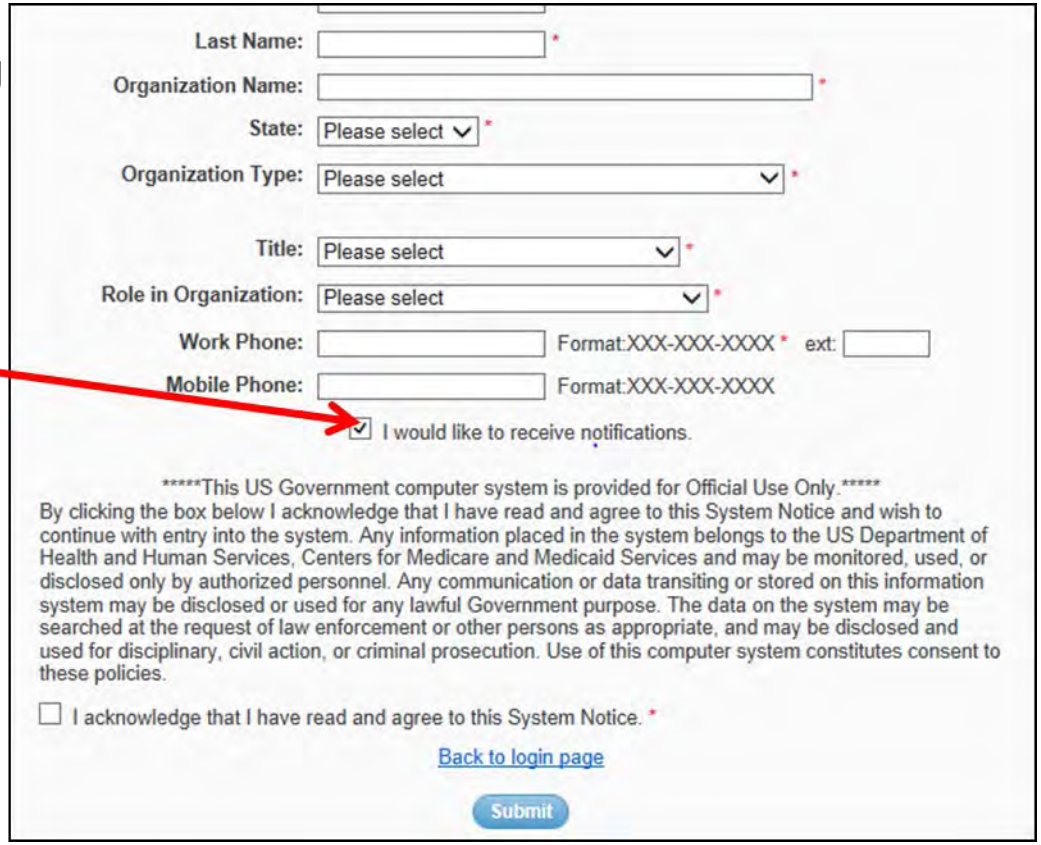
The FAQs Database allows users to search FAQs by FAQ ID, Keyword/Phrase, Program Area, Primary and Secondary categories and Publish Date.

FAQs Database is available at https://www.REGTAP.info



Notifications Opt In/Opt Out

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Closing Remarks