

Reinsurance Contributions Resources

2015 Reinsurance Contributions
Hotline

Submitting Reinsurance Contributions Questions (continued)

If questions are not answered during the Reinsurance Contributions Hotline, entities may contact the Reinsurance Contributions mailbox at reinsurancecontributions@cms.hhs.gov.

Reinsurance Contributions Resources

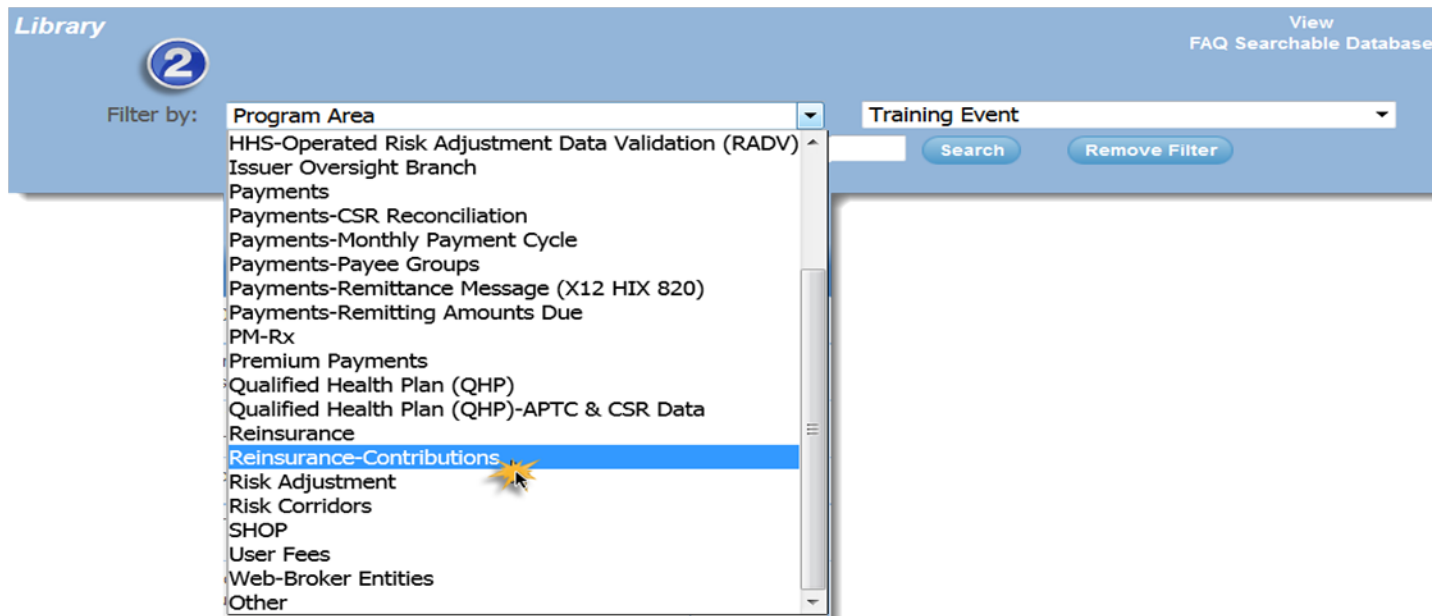
2015 Module Title	Content
Module 1: Transitional Reinsurance Program Contributions Overview for 2015 Benefit Year	<ul style="list-style-type: none"> • Defines a Contributing Entity in 2015 • Summarizes exempted organizations in 2015 • 2015 Uniform Contribution Rate • 2015 Key Deadlines • Provides an overview of the 2015 submission process
Module 2: 2015 Reinsurance Contributions Counting Methods Overview	<ul style="list-style-type: none"> • Defines a Contributing Entity in 2015 and defines major medical • Provides a walk through of each Counting Method • Consistency Requirements and Aggregation • Calculation of Contribution Amounts • 2015 Key Deadlines
Module 3: 2015 Reinsurance Contributions Program Form Completion, Submission and Payment	<ul style="list-style-type: none"> • Provides an overview of the 2015 submission process • Notable Updates for the 2015 Benefit Year • Data needed to complete the Form for the 2015 Benefit Year • Registering on Pay.gov • Provides a walk through of the 2015 ACA Transitional Reinsurance Program Annual Enrollment and Contributions Submission Form
Module 4: 2015 Reinsurance Contributions Updating Contributions Filings	<ul style="list-style-type: none"> • Locates previous Form filings to make updates • Reviews the process for making updates to previous Form filings • Explains the types of communication a Contributing Entity may receive after filing the Form • Differentiates between Re-Filing and Re-Submission of the Form • Provides an overview of the various resources available

Reinsurance Contributions Resources (continued)

Resource	Type/Location
2015 Reinsurance Contributions Form Completion, Submission and Payment WBT	WBT to explain how to complete the 2015 Form
2015 Transitional Reinsurance Form Quick Start Guide	Provides instructions on completing the 2015 Form
Special Topic: Successful Completion of 2015 Reinsurance Contributions Supporting Documentation (.CSV file) Four (4) or More Contributing Entities	<ul style="list-style-type: none"> • Who is Required to Submit Supporting Documentation (.CSV file)? • What Information is Needed to Complete Supporting Documentation (.CSV file)? • Tools Available to Create the Supporting Documentation (.CSV file) • Key Deadlines and Next Steps
2015 Supporting Documentation Job Aid	Job aid tool posted on REGTAP and the CCIIO website to assist in the creation of the .CSV Supporting Documentation File
2015 Supporting Documentation Job Aid Manual	Manual posted on REGTAP and the CCIIO website to assist in the completion of the Job Aid Tool used to create the .CSV Supporting Documentation File
2015 File Layout	Document to explain the required data elements to create the .CSV Supporting Documentation File

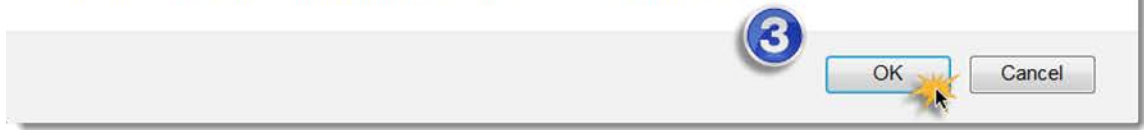
Locating the WBT

1. Select the **Library** icon.
2. Select **Reinsurance-Contributions** in the Filter by section.



Locating the WBT (continued)

Click OK to be redirected to the Library page specific for Reinsurance-Contributions which lists documents by benefit year.
 Click Cancel to remain in the main Library which contains documents for all program areas.



3. Select the **OK** button.
 4. Select the **Play CBT** button.

2015 Reinsurance-Contributions					
Program Icon	Title	Date	Program Area	Resource Type	Download
	2015 Reinsurance Contributions Annual Enrollment and Contributions Submission Form Manual	10/14/2015	Reinsurance-Contributions	Supporting Documents	Download
	2015 Benefit Year: Module 4 - 2015 Reinsurance Contributions: Updating Contributions Filings	10/14/2015	Reinsurance-Contributions	Presentation Slides	Download
	2015 Transitional Reinsurance Program - Timing of Contributions Refund Requests	10/09/2015	Reinsurance-Contributions	Supporting Documents	Download
	2015 Benefit Year - Job Aid and Job Aid Manual	10/09/2015	Reinsurance-Contributions	Job Aid	Download
	2015 Reinsurance Contributions Form Completion and Submission Interactive Web-Based Training (WBT)	10/08/2015	Reinsurance-Contributions	CBT	<div style="display: flex; align-items: center;"> 4 <div style="display: flex; flex-direction: column; gap: 5px;"> Play CBT Transcript </div> </div>

Resources

Resource	Link/Contact Information
The Center for Consumer Information & Insurance Oversight (CCIIO) Reinsurance Contributions Web Page	https://www.cms.gov/CCIIO/Programs-and-Initiatives/Premium-Stabilization-Programs/The-Transitional-Reinsurance-Program/Reinsurance-Contributions.html
Reinsurance Contributions Questions	ReinsuranceContributions@cms.hhs.gov
Registration for Technical Assistance Portal (REGTAP) - presentations, FAQs	https://www.REGTAP.info
Registration and Form on Pay.gov	https://pay.gov/paygov/

Reinsurance Contributions Overview

2015 Benefit Year Updates

Updates	
Definition of Contributing Entity	<p>Self-insured, self-administered group health plans that do <i>not</i> use a TPA in connection with claims processing or claims adjudication or plan enrollment are NOT required to make contributions.*</p> <p>*Exceptions permit the use of TPAs for: (a) pharmacy benefits and/or excepted benefits; (b) de minimis administrative services for medical benefits; and/or (c) leasing of provider networks and related services</p>
2015 Uniform Contribution Amount	<p>The uniform contribution amount for the 2015 benefit year is \$44.00 per reinsurance covered life.</p>
Supporting Documentation	<p>Only required for Form submissions with four or more Contributing Entities.</p>

Who is Required to Make Reinsurance Contributions for the 2015 Benefit Year?

Contributing Entity generally includes:

- A health insurance issuer; or
- A self-insured group health plan (including a group health plan that is partially self-insured and partially insured, where the health insurance coverage does not constitute major medical coverage) that uses a TPA in connection with claims processing or adjudication (including the management of internal appeals) or plan enrollment for services other than for pharmacy benefits or excepted benefits within the meaning of section 2791(c) of the Public Health Service (PHS) Act

Self-Insured Self-Administered Exemption

- For the 2015 and 2016 Benefit Years, contributions are not required from a self-insured group health plan that **does not** use a TPA in connection with claims processing or claims adjudication (including the management of internal appeals) or plan enrollment.
- However, a self-insured group health plan is permitted to use an unrelated third party for the following without losing its self-administered status:
 - *De minimis* administrative services for medical benefits (5% or less)
 - Leasing of provider networks and related services

Compliance Standards

Standard	Policy
Acknowledgement	On Pay.gov, each Contributing Entity (or TPA or ASO contractor on their behalf) will acknowledge that the information submitted on the ACA Transitional Reinsurance Program Annual Enrollment and Contributions Submission Form is accurate and complete.
Maintenance of Records	A Contributing Entity must maintain and make available, documents and records, whether paper, electronic, or in other media, sufficient to substantiate the enrollment count submitted pursuant to this section for a period of at least 10 years (See 45 CFR 153.405(h)).
Audits	HHS may audit a Contributing Entity to assess its compliance with the requirements of the Transitional Reinsurance Program (See 45 CFR 153.405(i)).

Reinsurance Contributions Submission Process Overview

Contributions Submission Process Overview

To successfully complete the Contributions Submission process, Contributing Entities or Reporting Entities must do the following:

Step	Action
1	Calculate the Annual Enrollment Count
2	Register on Pay.gov or confirm your password if you registered for the previous benefit year of the program (2014)
3	Access the 2015 ACA Transitional Reinsurance Program Annual Enrollment and Contributions Submission Form , when available
4	Complete the Form (which includes providing Contributing Entity information when reporting for three [3] or fewer Contributing Entities and entering your Annual Enrollment Count). Be sure to review and attest to the accuracy of the Annual Enrollment Count(s), the Attestation and Acknowledgement Statements
5	Upload Supporting Documentation only when reporting for four (4) or more Contributing Entities
6	Schedule payment for calculated contributions on the payment page (Note: The payment date will default to the next business day, unless another date is selected)

Who is Required to Submit Supporting Documentation?

4↑

If you are a Reporting Entity or Contributing Entity filing on behalf of four (4) or more Contributing Entities on one (1) Form, Supporting Documentation is **REQUIRED**



If you are a Reporting Entity or Contributing Entity filing on behalf of three (3) or fewer Contributing Entities on one (1) Form, Supporting Documentation is **NOT REQUIRED**

Tools Available to Create Supporting Documentation

- Supporting Documentation must be submitted in a Comma Separated Value (.CSV) file format
- Tools available:
 - 2015 File Layout document – details the columns required for the manual creation of a .CSV file
 - Understanding of the exact file layout requirements will prevent upload failures by those choosing to manually create a .CSV file
 - 2015 Supporting Documentation Job Aid – a macro enabled spreadsheet that provides ease of creation of the .CSV file
 - The Job Aid is not compatible with MAC
 - The Job Aid will **create** the .CSV file
 - 2015 Supporting Documentation Job Aid Manual – a document that assists with requirements of the Job Aid tool

Important Pay.gov Notes

Pay.gov Notes:

Only create one (1) Pay.gov account for your organization to complete the Contributions Submission process.

- For example, the TPA or ASO contractor creates **ONLY** one (1) Pay.gov account to submit the Annual Enrollment Count and contribution on behalf of one (1) or more Contributing Entities.
- Multiple Pay.gov accounts per Legal Business Name (LBN) or Tax Identification Number (TIN) should **NOT** be created.

Pay.gov does not limit the number of Forms filed or bank accounts used under one (1) Pay.gov account.

- However, each Form submission is limited to one (1) bank account per Contribution payment

Submit inquiries to reinsurancecontributions@cms.hhs.gov.



If your inquiry is specific to your Pay.gov user account, contact Pay.gov directly.

Payment Options

Payment Options:

- **Two-Part Contribution**
 - First Collection – Contribution for Program Payments and Administration Funds (\$33.00)
 - Second Collection – Contribution for General Fund of the US Treasury (requires a second Form filing) (\$11.00)
- **Combined Collection** – First Collection + Second Collection = Combined Collection (full contribution in one payment) (\$44.00)

Type of Payment ?

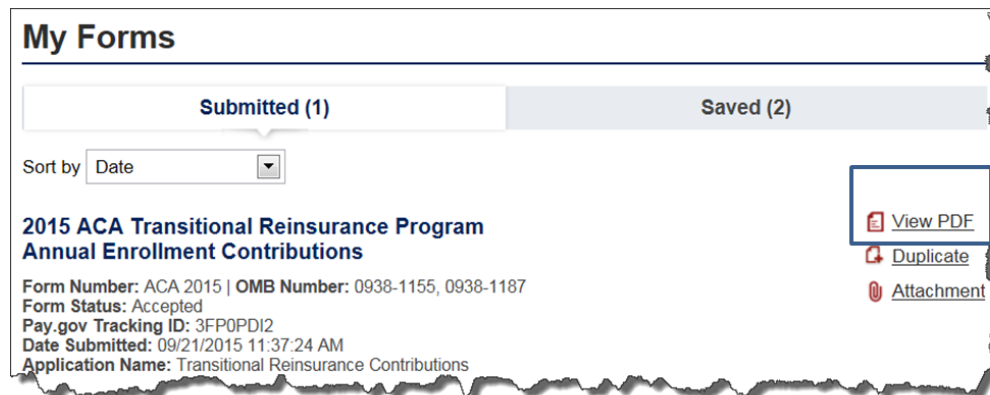
- | | | |
|----------|---|--|
| Option 1 | → | <input type="checkbox"/> First Collection - Contribution for Program Payments and Program Administration Funds (Regulatory Due Date - January 15, 2016)
<input type="checkbox"/> Second Collection - Contribution for General Fund of the US Treasury (Regulatory Due Date - November 15, 2016) |
| Option 2 | → | <input type="checkbox"/> Combined Collection - First Collection + Second Collection (as described above) (Regulatory Due Date - January 15, 2016) |

First Collection and Second Collection

Payment Option 1: Two-part Contribution

A two-part contribution:

- Duplication of the Form used for the First Collection on Pay.gov allows for ease of filing the second Form submission as the Second Collection.
- Both the First Collection and Second Collection **must be filed** no later than the November 16, 2015.



My Forms

Submitted (1) | Saved (2)

Sort by Date

**2015 ACA Transitional Reinsurance Program
Annual Enrollment Contributions**

Form Number: ACA 2015 | OMB Number: 0938-1155, 0938-1187
Form Status: Accepted
Pay.gov Tracking ID: 3FP0PD12
Date Submitted: 09/21/2015 11:37:24 AM
Application Name: Transitional Reinsurance Contributions

[View PDF](#)
[Duplicate](#)
[Attachment](#)

Combined Collection

Payment Option 2: Combined Collection

Select Combined Collection to file for the full contribution no later than the November 16, 2015, with payment due by January 15, 2016 reflecting \$44.00 per covered life.

Combined Collection = First Collection + Second Collection

Key Deadlines for the 2015 Benefit Year

Date	Activity	Contribution Amount
To Make a Full Contribution in One Payment (Combined Collection):		
No later than November 16, 2015	Submit the Form and schedule payment by due date	
No later than January 15, 2016	Full contribution amount due (single payment)	\$44.00 per covered life
		TOTAL \$44.00
OR		
To Make a Two-part Contribution (First and Second Collection):		
No later than November 16, 2015	Submit the Form and schedule payment of first collection contribution (by due date) and duplicate the Form and schedule payment of second collection (by due date)	
No later than January 15, 2016	First contribution amount due	\$33.00 per covered life
No later than November 15, 2016	Second contribution amount due	\$11.00 per covered life
		TOTAL \$44.00

Counting Methods Overview

Introduction to Counting Methods

The applicable counting method depends upon the following:

- 1) Whether the Contributing Entity is a health insurance issuer or a self-insured group health plan
- 2) Whether, in the case of a group health plan that is a Contributing Entity, the plan offers more than one (1) coverage option

Counting Methods for Calculating Reinsurance Covered Lives Counts

Counting Method*	Health Insurance Issuers	Self-Insured Group Health Plans
Actual Count	✓	✓
Snapshot Count	✓	✓
Snapshot Factor		✓
Member Months or State Form	✓	
Form 5500		✓

*See 45 CFR 153.405 for a description of each counting method

Consistency Requirements

- A Contributing Entity must use the same counting method for an entire calendar year.
- When a plan sponsor that maintains multiple group health plans is calculating the average number of reinsurance covered lives across two (2) or more plans, the same counting method **must** be used across all of the plans because they would be treated as a single plan for counting purposes.
 - However, a plan sponsor that maintains multiple group health plans can treat its plans as separate group health plans if the sponsor determines the number of covered lives under each plan as if the separate group health plan provided major medical coverage
- Consistency in counting methods is **NOT** required between the enrollment count calculated under the Patient-Centered Outcomes Research Trust Fund (PCORTF) Rule and the count calculated for reinsurance purposes.

Filing Discrepancy Overview

Discovery of Discrepancies

CMS Discovery

- CMS will specify the type(s) of discrepancies discovered via email.
- The email will include “Action Required” in the subject line
- The e-mail will state what discrepancy is identified in your filing
- Specific instructions to resolve the discrepancy are provided

Contributing (or Reporting) Entity Discovery

Contributing Entity (or Reporting) discovers a discrepancy:

Review Module 4 slides and other applicable guidance relevant to your discrepancy

Re-file or resubmit the Form as appropriate for your discrepancy

For further assistance and guidance, email

reinsurancecontributions@cms.hhs.gov and provide details regarding your discrepancy

Resubmission vs. Re-filing

Before making updates or corrections, it is important to understand the difference between Resubmission and Re-filing.

Resubmission

Used only in an instance when Supporting Documentation (.CSV file) must be corrected and resubmitted for the Form.

Re-filing

Used to correct or replace an existing filing under the following circumstances:

- ACH debit failure
- Banking information change
- Error in Annual Enrollment Count



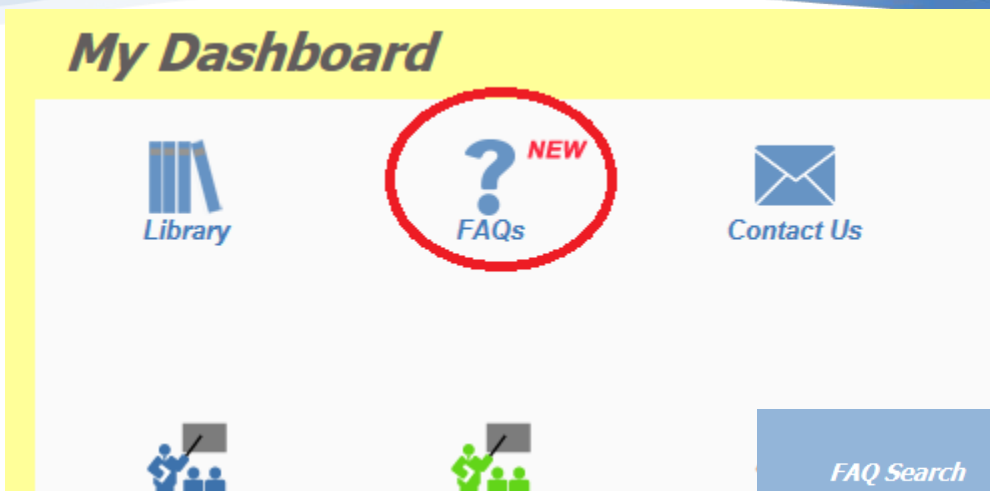
In some instances, you must first cancel your original filing prior to re-filing.

Correcting ACH Failure

Discrepancy	Bank rejects ACH Debit transaction
Resolution	<ul style="list-style-type: none">• Payment cancelation of previous Form is not necessary.• Duplicate the original Form, and select Re-File under the Type of Filing section.• Include previous Pay.gov Tracking ID of the Form in which payment was rejected or not processed.• Enter corrected ACH debit information and schedule payment.<ul style="list-style-type: none">• If ACH failure is due to ACH debit block, you must first contact the bank and provide the following:<ul style="list-style-type: none">• ALC+2 value 7505008015• Company ID USDEPTHHSCMS• Re-file and schedule payment of the Form after accommodating the necessary time for the bank to clear the ACH debit block.

Frequently Asked Questions (FAQs)

FAQ Database on REGTAP



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

FAQ Database is available at <http://www.REGTAP.info>





How do I submit the 2014 ACA Transitional Reinsurance Program Annual Enrollment Contributions Submission Form (Form)?

If you need to submit a 2014 ACA Transitional Reinsurance Program Annual Enrollment Contributions Submission Form, you have two options: (1) if you previously submitted a 2014 Form, you can still access that Form through the “My Account” page of Pay.gov and duplicate that previously submitted Form or (2) use this link <https://pay.gov/public/form/start/64510311> to locate the 2014 Form.



What is the difference between a Reporting Entity and a Contributing Entity?

A Reporting Entity is the organization completing the steps for the Reinsurance Contributions submission process on Pay.gov on their own behalf or for another Contributing Entity. The Reporting Entity can be the Contributing Entity or a third party on behalf of a Contributing Entity.

A Contributing Entity is a health insurance issuer; or self-insured group health plans that use a Third Party Administrator (TPA) in connection with claims processing or adjudication (including the management of internal appeals) or plan enrollment for services other than for pharmacy benefits or excepted benefits within the meaning of section 2791(c) of the Public Health Service (PHS) Act.



Do covered lives of reinsurance contribution enrollees include contracted employees, retirees, spouses, and dependents?

Applicable to All Reinsurance Contributions Benefit Years

Yes. Reinsurance contributions are generally based on the number of covered lives covered within a plan or coverage that provides major medical coverage. The reinsurance contribution required from a contributing entity is calculated by multiplying the number of covered lives (determined under a permitted counting method set forth in 45 CFR 153.405(d) through 45 CFR 153.405(g)) during the applicable calendar year for all applicable plans and coverage of the contributing entity by the applicable contribution rate for the respective benefit year. Depending on the counting method, the number of covered lives may be greater than the number of participants or employees because covered lives also include contracted employees, retirees, spouses, and dependents (i.e. any covered life enrolled in the plan).

Is the Reinsurance Contribution based on the calendar year even if the Contributing Entity operates on a plan year that is not on a calendar-year basis?

Applicable to Reinsurance Contributions 2015 Benefit Year

Yes. The Annual Enrollment Count for the Transitional Reinsurance Program is based on a calendar year. A Contributing Entity must use one (1) of the permitted counting methods in 45 CFR 153.405(d) through 45 CFR 153.405(g). These counting methods generally calculate covered lives based on enrollment in the first nine (9) months of a calendar year.

Entities may also refer to 'The Transitional Reinsurance Program Operational Guidance: Examples of Counting Methods for Contributing Entities - UPDATED FOR THE 2015 BENEFIT YEAR' and 'Module 2: 2015 Reinsurance Contributions Counting Methods Overview' available in the REGTAP Library at <https://www.regtap.info> under the Reinsurance-Contributions Filter or the Center for Consumer Information and Insurance Oversight (CCIIO) website <https://www.cms.gov/CCIIO/Programs-and-Initiatives/Premium-Stabilization-Programs/The-Transitional-Reinsurance-Program/Reinsurance-Contributions.html>.

Are counting methods for calculating the Annual Enrollment Count for Reinsurance Contribution purposes the same as the counting methods used for the Patient-Centered Outcome Research Trust Fund fee (PCORI Fee)?

Applicable to Reinsurance Contributions 2015 Benefit Year

No. The counting methods for the Reinsurance program are similar to, but vary in certain instances from, the counting methods permissible for the Patient-Centered Outcome Research Trust Fund fee, largely due to the differences in the timing of the payments from the two (2) programs. For the Reinsurance program, a Contributing Entity must use one of the permitted counting methods in 45 CFR 153.405(d) through 45 CFR 153.405(g). These counting methods generally calculate covered lives based on enrollment in the first nine (9) months of a calendar year.

You may also refer to the Supporting Document, titled: 'The Transitional Reinsurance Program Operational Guidance: Examples of Counting Methods for Contributing Entities - UPDATED FOR THE 2015 BENEFIT YEAR' and 'Module 2: 2015 Reinsurance Contributions: Counting Methods Overview' available in the Registration for Technical Assistance Portal (REGTAP) Library under Reinsurance-Contributions.



Can you explain the difference between the three (3) types of payment options (First Collection, Second Collection and Combined Collection)?

Applicable to Reinsurance Contributions 2015 Benefit Year

The U.S. Department of Health and Human Services (HHS) offers Contributing Entities the option to pay the full 2015 Benefit Year contribution (1) in one (1) payment (i.e., Combined Collection) no later than January 15, 2016, reflecting \$44.00 per covered life; or (2) in a two-part payment, with the first amount due by January 15, 2016, reflecting \$33.00 per covered life (i.e., First Collection), and the second payment due November 15, 2016, reflecting \$11.00 per covered life (i.e., Second Collection).

Regardless of the payment option selected, a Contributing Entity must submit its Annual Enrollment Count and schedule their reinsurance contribution payment date(s) no later than Monday, November 16, 2015 by completing the “2015 ACA Transitional Reinsurance Program Annual Enrollment and Contribution Submission Form” (2015 Form) through Pay.gov.

If a two-part payment is chosen, the Contributing Entity is to file the 2015 Form for the Second Collection on the same day as the Form filing for the First Collection. To do this, duplicate the Form filing for the First Collection and submit it to reflect the Second Collection. You must schedule the Second Collection remittance prior to November 15, 2016. The Second Collection amount will not be withdrawn until the scheduled date or the next business day if the scheduled payment date is a weekend or a Federal Reserve holiday. The Annual Enrollment Count in the Form (and Supporting Documentation, if applicable) for both the First and Second Collection must match.

Please clarify whether the plan sponsor of a self-insured plan (the Contributing Entity) that changes Third Party Administrators (TPAs) during the 1st three (3) quarters of the year can have each TPA submit the “2015 ACA Transitional Reinsurance Program Annual Enrollment and Contributions Submission Form” attesting to the annual member count during the portion of the 1st three (3) quarters the TPA administered the plan or just one (1) Form must be submitted if the plan was self-insured for the entire period?

Applicable to Reinsurance Contributions 2015 Benefit Year

Only one (1) Reporting Entity is to file the '2015 ACA Transitional Reinsurance Program Annual Enrollment Contributions Form' per Contributing Entity; therefore, both TPAs would not be able to report for the same Contributing Entity only covering a portion of the benefit year because the single submission must reflect the entire benefit year. The ultimate responsibility to make reinsurance contributions remains with the Contributing Entity, and the decision to delegate the function of submitting the reinsurance contribution resides with the Contributing Entity.

Next Steps

Next Steps

- **NOW**

- Complete the 2015 ACA Transitional Reinsurance Program Annual Enrollment and Contributions Submission Form by the Monday, November 16, 2015 filing deadline.
- Contact your bank to remove ACH debit blocker.
- Review filings and if necessary, make updates and corrections.
- Review your REGTAP emails for updates (<https://www.regtap.info/>).
- For questions regarding Contributions, please contact us at reinsurancecontributions@cms.hhs.gov.
- Monitor the CCIO web page: <https://www.cms.gov/CCIO/Programs-and-Initiatives/Premium-Stabilization-Programs/The-Transitional-Reinsurance-Program/Reinsurance-Contributions.html>.
- Respond promptly to all **Action Required** emails from CMS.

Scheduled 2015 Reinsurance Contribution Submission Hotline

- **Reinsurance Contribution Submission Hotline:** CMS will host a hotline to assist contributing (or reporting) entities in completing the 2015 ACA Transitional Reinsurance Program Annual Enrollment and Contributions Submission Form. This hotline will be open Q&A during the dates and times specified below. All entities dialed into the hotline can benefit from questions asked and answered.

Access Information:

Phone: 877-848-1919

Web: <https://regtap.webex.com/regtap/onstage/g.php?d=643910582&t=a>

Date	Time
Monday, October 26, 2015	1:00 p.m. – 2:30 p.m. ET
Wednesday, October 28, 2015	1:00 p.m. – 2:30 p.m. ET
Wednesday, November 4, 2015	1:00 p.m. – 2:30 p.m. ET
Thursday, November 5, 2015	1:00 p.m. – 2:30 p.m. ET
Monday, November 9, 2015	9:00 a.m. – 5:00 p.m. ET
Tuesday, November 10, 2015	9:00 a.m. – 5:00 p.m. ET
Wednesday, November 11, 2015	9:00 a.m. – 5:00 p.m. ET
Thursday, November 12, 2015	9:00 a.m. – 5:00 p.m. ET
Friday, November 13, 2015	9:00 a.m. – 5:00 p.m. ET
Monday, November 16, 2015	9:00 a.m. – 5:00 p.m. ET

