# Module 4 - 2015 Reinsurance Contributions: Updating Contributions Filings

## October 14, 19 and 21, 2015

Payment Policy & Financial Management Group, Division of Reinsurance Operations Training Series



### **Session Guidelines**

- This is a 90 minute webinar session
- For questions regarding content, please submit inquiries to:
  - reinsurancecontributions@cms.hhs.gov
- For questions regarding logistics and registration, please contact the Registrar at: (800) 257-9520



## Agenda

- Review Common Filing Discrepancies
- How to Discover a Discrepancy
- How to Review and Duplicate the 2015 Form
- Completing a two-part contribution payment
- Refiling versus Resubmitting the 2015 Form
- Correcting Automated Clearing House (ACH) Debit Transaction Failure
- Form and Supporting Documentation Mismatch
- Correcting Annual Enrollment Count
- Re-submitting Supporting Documentation

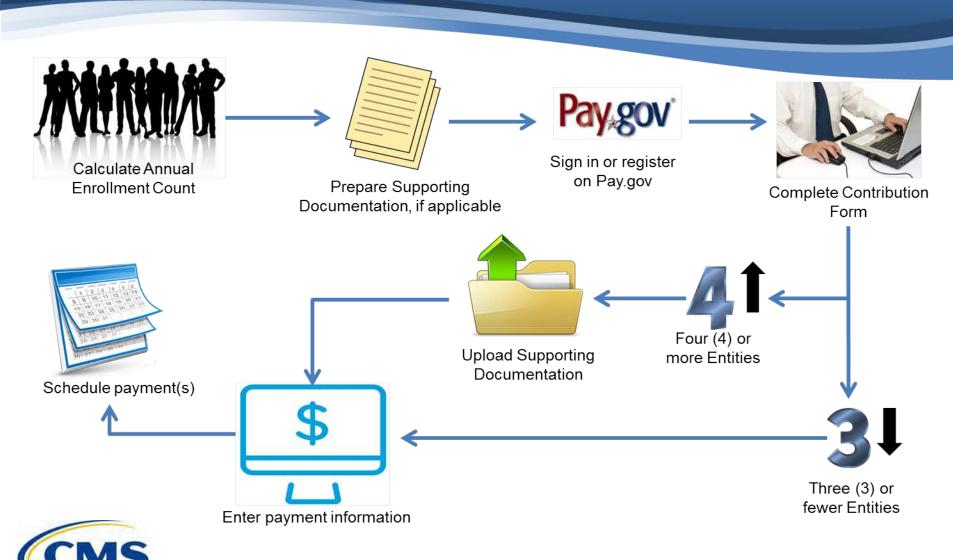


### **Intended Audience**

- Health Insurance Issuers
- Plan Sponsors
- Third Party Administrators (TPAs)
- Administrative Services-Only (ASO) Contractors



## **Contributions Submission Process**



## **Common Filing Discrepancies**

#### The most common discrepancies include:

- 1. Scheduled only One-part of a Two-part Collection
- 2. ACH Debit Failure
- 3. 2015 Form and Supporting Documentation Do Not Match
- 4. Incorrect Annual Enrollment Count
- 5. Supporting Documentation Formatting Error



## Discovery of Discrepancies

You can remediate receiving notifications from CMS by thoroughly reviewing the 2015 Form; therefore review your filing for the following type of discrepancies:

- If filing a two-part collection, did you file and schedule both the First Collection and the Second Collection?
- Did you use accurate banking information?
- Has the ACH debit block (7505008015) been removed from the account?
- Does the Annual Enrollment Count entered in the Form accurately reflect the reinsurance covered lives in your plan using an approved counting method?
- If applicable, does the aggregated Annual Enrollment Count included in the Supporting Documentation match the aggregated Annual Enrollment Count entered in the Form?
- If applicable, was the Supporting Documentation uploaded to Pay.gov in the correct (.CSV) format and layout?



### Discovery of Discrepancies (continued)

- When CMS discovers a filing discrepancy, the Contributing or Reporting Entity (as applicable) will receive an **Action** Required email. The most common discrepancies include:
  - Scheduling only a single part of a two-part collection
  - ACH failure
  - Form and Supporting Documentation mismatch
  - Supporting Documentation format discrepancy
- Resubmission (Type of Filing) is used when updating Supporting Documentation



### Discovery of Discrepancies (continued)

#### **CMS Discovery**

CMS will specify the type(s) of discrepancies discovered via email.

- The e-mail will state what discrepancy is identified in your filing.
- The email will include the "Action Required" in the Subject Line.
- Specific instructions to resolve the discrepancy are provided.

## Contributing (or Reporting) Entity Discovery

Contributing Entity (or Reporting) discovers a discrepancy:

Review these 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.



## How to Review 2015 Form Filings?

Navigate to your previous 2015 Form filings by logging into Pay.gov.





Sign in using the user name and password used when you originally completed the 2015 Form.



### My Account Section

From the menu at the top of the screen, select My Account.





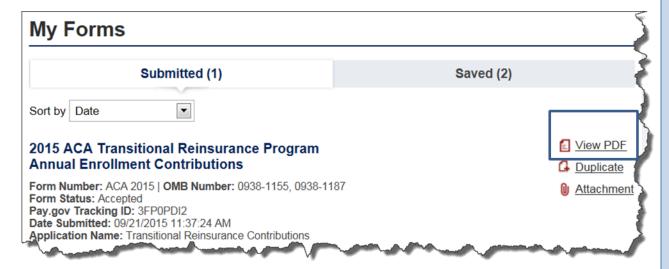


Welcome, jabbott | My Account

## View or Duplicate the Form

**REMINDER**: The user will review by the Pay.gov tracking number to

ensure the proper Form is viewed or duplicated.



From this section of Pay.gov, you can:

View the Form as a PDF

Duplicate the Form to Re-file

Duplicate the Form to Complete

Resubmission



If you discover a discrepancy when reviewing your completed Form, email

<u>reinsurancecontributions@cms.hhs.gov</u> and provide specific information regarding the discrepancy.

## Discrepancy Scenario #1: One-Part of a Two-Part Collection Filed

- Failing to file and schedule both payments for a twopart collection will cause a discrepancy.
- To resolve this discrepancy, you will duplicate the Form already filed for the one payment of the two-part collection.
- REMINDER: The user will view Forms by the Pay.gov tracking number to ensure the proper Form is viewed or duplicated.



## Discrepancy Scenario #1: One-Part of a Two-Part Collection Filed (continued)

Discrepancy #1	Two-Part Collection Filed – Filed ONLY the First Collection OR the Second Collection – No companion payment filed.
Resolution	<ul> <li>Follow the steps for duplicating the Form.</li> <li>Ensure New is selected as the Type of Filing.</li> <li>Select the missing payment type (First Collection or Second Collection) under Type of Payment that was not filed. <ul> <li>For example, if you completed the 2015 Form for the First Collection, choose Second Collection under Type of Payment; or</li> <li>If you completed the 2015 Form for the Second Collection, choose First Collection under Type of Payment.</li> </ul> </li> <li>Verify all information is accurate, and schedule payment.</li> </ul>



## Discrepancy Scenario #1: One-Part of a Two-Part Collection Filed (continued)

Ensure **New** is selected as the Type of Filing.



- \* Type of Payment ? (All payment types must be filed and scr
  - First Collection Contribution for Program Payments (Regulatory Payment Due Date January 15, 2016)
  - Second Collection Contribution for General Fund of (Regulatory Payment Due Date November 15, 2016)
    - Combined Collection First Collection + Second Colle (Regulatory Payment Due Date - January 15, 2016)
- Select Second Collection to file the Second Collection contribution or First Collection to file the First Collection contribution.
- Verify all information on the Form, and schedule payment.



When duplicating the Form, you must update the **Type of Payment** in order to update the payment amount and prevent a duplicate payment.



### **Two-Part Collection Deadlines for 2015**

Date	Activity	Contribution Amount
First Collection		
No later than November 16, 2015	Submit Form and schedule payment for the <b>First Collection</b>	
No later than January 15, 2016	Remit first contribution amount	\$33.00 per covered life
Second Collection		
No later than November 16, 2015	Submit Form and schedule payment for the <b>Second Collection</b>	
No later than November 15, 2016	Remit second contribution amount	\$11.00 per covered life
	TOTAL	\$44.00



### Resubmission vs. Re-filing

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

#### Resubmission

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



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

#### **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



## Discrepancy Scenario #2: Correcting ACH Failure

Discrepancy #2	Bank rejects ACH Debit transaction
Resolution	<ul> <li>Payment cancelation of previous Form is not necessary.</li> </ul>
	<ul> <li>Duplicate the original Form, and select Re-File under the Type of Filing section.</li> </ul>
	<ul> <li>Include previous Pay.gov Tracking ID of the Form in which payment was rejected or not processed.</li> </ul>
	Enter corrected ACH debit information and schedule
	payment.
	<ul> <li>If ACH failure is due to ACH debit block, you must first contact the bank and provide the following:</li> </ul>
	<ul> <li>ALC+2 value 7505008015</li> </ul>
	Company ID USDEPTHHSCMS
	<ul> <li>Re-file and schedule payment of the Form after accommodating the necessary time for the bank to clear the ACH debit block.</li> </ul>



## Discrepancy Scenario #2: Correcting ACH Failure (continued)



- Note the Pay.gov Tracking ID.
- Select **Duplicate** from the My Forms
   section.

Select **Re-Filing** from the Type of Filing page.

ACA Transitional Reinsurance Program
Annual Enrollment and Contributions Submission Form

Need Help?

\* Type of Filing ?

New Re-Filing © Resubmission © Invoice



## Discrepancy Scenario #2: Correcting ACH Failure (continued)

\* Previous Pay.gov Tracking ID

3FP0PDI2

 Enter the Pay.gov Tracking ID of the failed transaction; CMS links the filings.

Please provide the payment information be	ow. Required fields are marked with an
* Payment Amount:	
\$66,000.00	
* Payment Date (mm/dd/yyyy)	
01/11/2016	
* Account Holder Name	
Raven Health	
* Please select a payment account:	
Business Checking **********0012	
<ul> <li>I want to enter a new account</li> </ul>	

Cancel

If the saved banking information was correct, select the Review and Submit Payment button
If the original banking information was incorrect, select the radio button next to I want to enter a new account to re-enter the correct banking information.

Review and Submit Payment



Previous

Return to Form



It could take a bank two to three weeks to accept and clear an ACH debit block.

# Discrepancy Scenario #3(a): Form and Supporting Documentation Annual Enrollment Count Mismatch – Error on the 2015 Form

Discrepancy #3(a)	Form and Supporting Documentation mismatch with Annual Enrollment Count entered incorrectly on the 2015 Form	
Resolution	If	Then
	The transaction status has not settled	Cancel the original filing and Re-File, entering the correct Annual Enrollment Count and upload the accurate Supporting Documentation. Be sure to include the prior Pay.gov Tracking ID associated with the canceled Form filing.
	The transaction has settled, AND the Annual Enrollment Count on the Form was calculated incorrectly resulting in an under- reporting (under payment)	Re-file and enter the difference in the Annual Enrollment Count field and then upload the accurate Supporting Documentation. Be sure to include the prior Pay.gov Tracking ID associated with the prior Form filing.
	The transaction has settled, AND the Annual Enrollment Count was calculated incorrectly resulting in an overpayment	Review the "Transitional Reinsurance Program – Timing of Contributions Refund Requests Due to Annual Enrollment Count Misreporting" April 2015 guidance. Email <a href="mailto:reinsurancecontributions@cms.hhs.gov">reinsurancecontributions@cms.hhs.gov</a> for further assistance. Be sure to include the Pay.gov Tracking ID associated with the Form filing in question.



# Discrepancy #3(b): Form and Supporting Documentation Annual Enrollment Count Mismatch – Error in the Supporting Documentation

Discrepancy #3(b)	Form and Supporting Documentation mismatch with Annual Enrollment Count entered incorrectly on the Supporting Documentation.	
Resolution	<ol> <li>Update the Supporting Documentation</li> <li>Duplicate the Form (note the Pay.gov Tracking ID)</li> <li>Select Resubmission as the Type of Filing</li> <li>Enter the Previous Pay.gov Tracking ID</li> <li>Upload the updated Supporting Documentation</li> </ol>	





## **Verify Transaction Status**

Under My Account > Payment Activity, select the **View Payment Activity** button.

#### My Account

Welcome to Pay.gov. This area is designed to allow self management and administration.

#### My Forms

View, complete, save, edit, and pay your online forms.

**View My Forms** 

#### **Payment Activity**

View historical payments and manage payments.

**View Payment Activity** 



### Verify Transaction Status (continued)



#### **Transaction Status:**

- Received Scheduled, but not paid
- Settled Payment in Transit or Paid
- Retired Transaction failed processing



Frequency: OneTime

## Cancel the Filing

Once the Transaction Status is identified as not settled or retired, select **Cancel** to cancel the payment.

#### **Payment Activity** Completed (0) Rejected (0) Pending (1) All (1) Sort by Transaction Date 2015 ACA Transitional Reinsurance Program View Details **Annual Enrollment Contributions** View Receipt Health and Human Services (HHS): Centers for Medicare & Medicaid Services Cancel (CMS) Pay.gov Tracking ID: 3FP0PDI2 Transaction Date: 09/21/2015 11:37:24 AM EDT Transaction Amount: \$16,500.00 Payment Type: Bank account (ACH) Transaction Status: Received Payment Date: 01/04/2016 Frequency: OneTime



## Discrepancy Scenario #4: Incorrect Annual Enrollment Filed

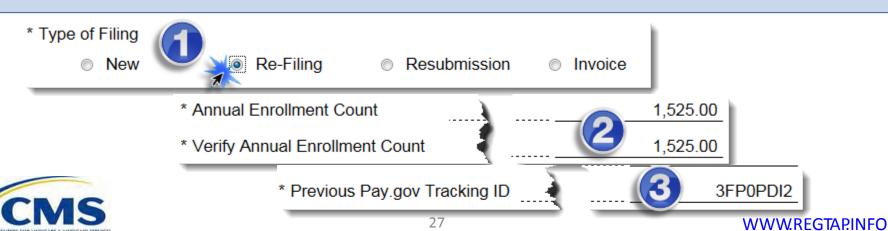
Discrepancy	Incorrect Annual Enrollment Count entered on the 2015 Form	
Resolution	If	Then
	The transaction status has not settled,	Cancel the original filing and Re-file, entering the correct Annual Enrollment Count. Include the prior Pay.gov Tracking ID associated with the canceled Form filing
	The transaction has settled, AND the Annual Enrollment Count was calculated incorrectly resulting in under-reporting (under payment),	Re-file and enter the difference in the Annual Enrollment Count field. Be sure to include the prior Pay.gov Tracking ID associated with the Prior Form Filing
	The transaction has settled, AND the Annual Enrollment Count was calculated incorrectly resulting in an overpayment,	Review the "Transitional Reinsurance Program – Timing of Contributions Refund Requests Due to Annual Enrollment Count Misreporting" April 2015 guidance. Email reinsurancecontributions@cms.hhs.gov for further assistance. Be sure to include the Pay.gov Tracking ID associated with the Form filing in question.



# Re-Filing the Form – Correcting Annual Enrollment Count when Transaction has not Settled or when Annual Enrollment Count is Under-reported

Follow the directions for duplicating a Form, and then:

- 1) Select **Re-Filing** under Type of Filing.
- 2) Update and verify the **Annual Enrollment Count**.
- 3) Enter the cancelled Form's Pay.gov Tracking ID when correcting the Annual Enrollment Count and the payment had not settled; or enter the initial Form's Pay.gov Tracking ID when the transaction has settled, and the Annual Enrollment Count was calculated incorrectly resulting in under-reporting (under payment).
- 4) Schedule payment.



## Annual Enrollment Count Over-Reported and Payment Settled (Refund Request)

- Please see the "Transitional Reinsurance Program Timing of Contributions Refund Requests Due to Annual Enrollment Count Misreporting," published April 14, 2015.
  - Available at:
     https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/RIC-Guidance-Refund-Request-Deadline-final-.pdf
- As stated in this Guidance, for the 2015 Benefit Year, permitted refund requests must be submitted <u>90 days from</u> the date of Form submission.



## Annual Enrollment Count Over-Reported and Payment Settled (Refund Request)(continued)

- A Contributing (or Reporting) Entity that correctly applied one of the approved counting methods set forth in 45 CFR 153.405(d) through (g) <u>cannot</u> request to change its Annual Enrollment Count method after the reporting deadline for the applicable benefit year, Monday, November 16, 2015.
- However, a Contributing (or Reporting) Entity may request a refund within 90 days of its original Form submission if the misreporting relates to: (a) misapplying an allowable counting method; or (b) including exempt individuals in the enrollment count.
- The 90-day deadline does not apply when a Contributing (or Reporting) Entity requests a refund because it has paid reinsurance contributions more than once for the same covered life.



## Annual Enrollment Count Over-Reported and Payment Settled (Refund Request) (continued)

To request a refund within the applicable timeframe, Contributing Entities must:

- Email reinsurancecontributions@cms.hhs.gov.
- Provide details regarding the discrepancy discovered, including the amount of overpayment and the method used to determine there was an overpayment.
- Follow the instructions provided in the CMS response.



## Discrepancy Scenario #5: Supporting Documentation Format Discrepancy

Discrepancy	The Supporting Documentation was rejected due to a formatting discrepancy
Resolution	<ol> <li>Update the Supporting Documentation so that it is in the correct .CSV format.</li> <li>Duplicate the Form (note the Pay.gov Tracking ID).</li> <li>Select Resubmission as the Type of Filing.</li> <li>Enter the Previous Pay.gov Tracking ID.</li> <li>Upload the updated Supporting Documentation.</li> </ol>





## **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 (<a href="https://www.regtap.info/">https://www.regtap.info/</a>).
- For questions regarding Contributions, please contact us at <a href="mailto:reinsurancecontributions@cms.hhs.gov">reinsurancecontributions@cms.hhs.gov</a>.
- Monitor the CCIIO web page: <a href="https://www.cms.gov/CCIIO/Programs-and-Initiatives/Premium-Stabilization-Programs/The-Transitional-Reinsurance-Program/Reinsurance-Contributions.html">https://www.cms.gov/CCIIO/Programs-and-Initiatives/Premium-Stabilization-Programs/The-Transitional-Reinsurance-Program/Reinsurance-Contributions.html</a>.

#### **LATER**

Respond promptly to all Action Required emails from CMS.



### Where Can I Go for More Information?

2015 Module Title	Content
Module 1: Transitional Reinsurance Program Contributions Overview for 2015 Benefit Year	<ul> <li>Defines a Contributing Entity in 2015</li> <li>Summarizes exempted organizations in 2015</li> <li>2015 Uniform Contribution Rate</li> <li>2015 Key Deadlines</li> <li>Provides an overview of the 2015 submission process</li> </ul>
Module 2: 2015 Reinsurance Contributions Counting Methods Overview	<ul> <li>Defines a Contributing Entity in 2015 and defines major medical</li> <li>Provides a walk through of each Counting Method</li> <li>Consistency Requirements and Aggregation</li> <li>Calculation of Contribution Amounts</li> <li>2015 Key Deadlines</li> </ul>
Module 3: 2015 Reinsurance Contributions Program Form Completion, Submission, and Payment	<ul> <li>Provides an overview of the 2015 submission process</li> <li>Notable Updates for the 2015 Benefit Year</li> <li>Data needed to complete the Form for the 2015 Benefit Year</li> <li>Registering on Pay.gov</li> <li>Provides a walk through of the 2015 ACA Transitional Reinsurance Program Annual Enrollment and Contributions Submission Form</li> </ul>



### Where Can I Go for More Information? (continued)

Resource	Type/Location
2015 Reinsurance Contributions Form Completion, Submission, and Payment WBT	Web-based training to explain how to complete the 2015 Form
2015 Transitional Reinsurance Form Quick Start Guide	Provide instructions on completing the 2015 Form
Special Topic: Successful Completion of 2015 Reinsurance Contributions Supporting Documentation (.CSV file) Four or More Contributing Entities	<ul> <li>Who is Required to Submit Supporting Documentation (.CSV file)?</li> <li>What Information is Needed to Complete Supporting Documentation (.CSV file)?</li> <li>Tools Available to Create the Supporting Documentation (.CSV file)</li> <li>Key Deadlines and Next Steps</li> </ul>
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



## Upcoming 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.

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	8:00 a.m. – 6:00 p.m. E.T.
Tuesday, November 10, 2015	8:00 a.m. – 6:00 p.m. E.T.
Wednesday, November 11, 2015	8:00 a.m. – 6:00 p.m. E.T.
Thursday, November 12, 2015	8:00 a.m. – 6:00 p.m. E.T.
Friday, November 13, 2015	8:00 a.m. – 6:00 p.m. E.T.
Monday, November 16, 2015	8:00 a.m. – 6:00 p.m. E.T.

#### **Access Information:**

Phone: 877-848-1919

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



## 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



## Regulatory References

Resource	Link/Contact Information
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)	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
HHS Notice of Benefit and Payment Parameters for 2016 (80 FR 10750)	http://www.gpo.gov/fdsys/pkg/FR-2015-02- 27/pdf/2015-03751.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
Registration and Form on Pay.gov	https://pay.gov/paygov/



### **FAQ Database on REGTAP**













FAQ Database is available at <a href="http://www.REGTAP.info">http://www.REGTAP.info</a>

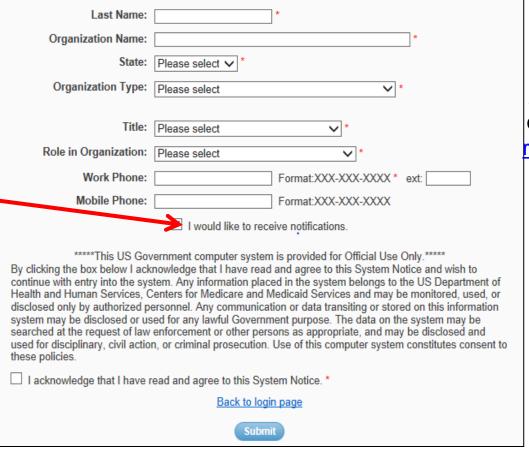
The FAQ Database allows users to search FAQs by FAQ ID, Keyword/Phrase, Program Area, Primary and Secondary categories and Publish Date.





## **Notifications Opt In/Opt Out**

Users have the option to opt in or opt out of receiving notifications when first registering in REGTAP by checking or unchecking the box for "I would like to receive notifications."



After initial registration, contact the Registrar at registrar@REGTAP.info, call (800) 257-9520, or submit an inquiry to www.REGTAP.info to change notification preference.



## **Closing Remarks**

