DEPARTMENT OF HEALTH AND HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop N3-26-00
Baltimore, Maryland 21244-1850

TO: Medicare Advantage & Prescription Drug Plan Sponsors and Certifying Actuaries

FROM: Jennifer Lazio, Director, Parts C & D Actuarial Group

DATE: June 1, 2022

SUBJECT: Contract Year (CY) 2023 Initial Actuarial Certification Deadline

As part of the CY2023 bid submission requirements, an actuarial certification must be submitted via the Health Plan Management System (HPMS) actuarial certification module for every Bid Pricing Tool (BPT) uploaded to HPMS. Certifying actuaries will be required to complete the certification process twice prior to bid approval—once in June and again in August—as discussed in Appendix A of the CY2023 BPT instructions. The module is now available and all initial certifications must be completed by **Friday, June 10, 2022 (11:59 p.m. PDT)**. The last version of a bid submitted prior to the bid submission deadline must be certified for this initial certification. By August, we will announce the deadline for the certification of the final bid submission.

Note that if a certification is not submitted via the HPMS module, the bid(s) will not be considered for CMS review or approval. Completing the actuarial certification is only one of the bid submission requirements. All other requirements must be completed by the appropriate deadlines in order for the bid to receive consideration for approval by CMS.

We also encourage actuaries to review the information uploaded to HPMS pertaining to the bids that they will certify. After the bid submission deadline any inconsistencies found within the BPT, or between the BPT and the Plan Benefit Package (PBP), should be discussed with the plan sponsor before they are brought to the attention of CMS. Should any changes seem warranted, please promptly contact the Office of the Actuary at BidReviewC@cms.hhs.gov. In your communication to CMS, clearly identify the contract/plan(s) and the specific issue(s) involved, and explicitly indicate which component(s) of the bid submission are proposed to change (MA PBP, PD PBP, MA BPT, or PD BPT). You must also demonstrate that the purpose of the request is to correct an error and that the change is consistent with the original assumptions used to develop the bid as of June 6, 2022. CMS will review resubmission requests on a case-by-case basis to evaluate the appropriateness of proposed changes.

For additional information on the CY2023 certification requirements and process, please refer to the following resources:

- Appendix A of the *Instructions for Completing the Medicare Advantage or Prescription Drug Plan Bid Pricing Tools for Contract Year 2023*.
- Chapter 10 of the *CY 2023 Bid Submission User Manual*.

For questions regarding bid resubmissions based on the actuarial certification review, please contact BidReviewC@cms.hhs.gov.

For technical questions, please contact the HPMS Help Desk at 1-800-220-2028 or hpms@cms.hhs.gov.

Technical Instructions for Completing the CY2023 Actuarial Certification Module

Prepared by CMS OACT (May 6, 2022)

Step 1: Access the HPMS actuarial certification module.

To access HPMS, you need a valid CMS User ID and Password.

Step 1a: Open a web browser and enter https://hpms.cms.gov in the address bar.

Step 1b: Enter your CMS User ID and Password. Click the "Login" button to proceed.

Step 1c: To access the HPMS Actuarial Certification Module, click on the following path: HPMS Home Page > Plan Bids > Bid Submission > CY 2023 > Actuarial Certification (under Upload).

Step 2: Select plan(s) to certify.

The first screen of the certification module contains a list of contracts to which you have access. If a contract that you will be certifying is not included on the list, contact the HPMS Help Desk.

You can select plans by either contract number or parent organization. The number in parenthesis after each contract/parent name refers to the number of bids awaiting certification.

From the list of contracts/parent names, select one or more that you would like to certify. On the next screen you can further filter by certifying actuary.

Click the "Next" button.

Step 3: Review the standardized certification language using the link labeled "here".

The certification module contains standardized language that will apply for all CY2023 certifications submitted to CMS. This language is consistent with the requirements contained in Appendix A of the CY2023 Bid Pricing Tool instructions.

Step 4: Enter any (optional) additional text, to be appended to the standardized language.

Actuaries are permitted, but not required, to append additional text (up to 4,000 characters) to the standardized certification language at their discretion. Any optional text entered will be applied to *all* bids selected to be certified.

The CMS Office of the Actuary will review any additional text entered in the certification.

Step 5: Select the specific Bid Pricing Tools (MA and/or Part D) to which the certification applies.

The certification may apply to the MA Bid Pricing Tool, the PD Bid Pricing Tool, or both. Use the check boxes at the bottom of the screen to indicate this application. The certification language (including any additional text entered) will apply to all bids selected. To select all MA bids or all PD bids listed, click on the "MA Bid" or "PD Bid" column heading.

Note: User access is granted at the contract-level. Therefore, an actuary will have access to certify *all* bids within a contract for which they have been identified as a certifying actuary. They will also have access to both the MA and PD BPTs to certify. Actuaries should check only the boxes of the BPTs that they intend to certify.

The certification module summarizes some high-level information pertaining to the bids selected. The screen includes the bid upload date, HPMS version number assigned at upload, Standardized Part D Bid, Total MA Rebates, and Total MA Premium, as well as links to each bid's BPTs and PBPs. We encourage actuaries to review the uploaded information pertaining to the bids that they are certifying.

Click the "Next" button.

Step 6: Review the certification and submit.

This screen displays the information entered on the previous screen – that is, the standardized certification language, any additional text appended to the standardized language, and the list of BPT(s) to which the certification applies.

Click the "Save" button to submit the certification to CMS.

Click "OK" to confirm submission.

Step 7: Save a copy of the certification for your records.

The completed certification will contain the date/time that the certification was submitted and the name/CMS User ID of the certifier.

The "Back" button will return you to the screen where additional contracts may be selected for certification. Follow Steps 2 through 7 for additional certifications of other plans.

Additional Technical Information

- The certification module can be completed by two different actuaries for the MA BPT versus the PD BPT. Also, different actuaries can submit certifications for specific plans under a contract. For example, plan 001 can be submitted by Actuary A and plan 002 can be submitted by Actuary B.

- Both the initial bid submission (in June) and the final bid submission (rebate reallocation in August) require certifications; interim resubmissions do not. The certification module will be *available* for each resubmission.

- Please note that the certification applies to a specific upload version of the bid. If a resubmission occurs during the bid review process, then the previously submitted certification does not automatically apply to the newly uploaded version.

- After the initial certification is submitted in June, the HPMS system will store any additional text entered in the certification module. Next to the text box for additional information is a "Reuse Existing Certification Language" section.

- Between the initial June certification and the final August certification, no substantive changes to the additional certification language entered by the actuary will be considered without prior permission from the CMS Office of the Actuary. The initial actuarial certification language submitted will be considered the definitive certification language, unless specific changes are requested by OACT. Any changes to the certification language, including changes or additions to any qualifications, would require prior permission from OACT.

- Every MA BPT requires a certification, as does every Part D BPT. Since MA and Part D BPTs are no longer completed for EGWPs (i.e., "800 series" employer bids), no actuarial certification is required for EGWPs.

- If you inadvertently submitted a certification for a plan that you did not intend to certify, contact BidReviewC@cms.hhs.gov.