

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.

* Type of Filing **1**

New Re-Filing Resubmission Invoice

* Annual Enrollment Count **2** 1,525.00

* Verify Annual Enrollment Count 1,525.00

* Previous Pay.gov Tracking ID **3** 3FP0PD12

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 **90 days from 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) **cannot** 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.