

# Fiscal Soundness Module Plan User Guide

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#### 1 Overview

The Health Plan Management System (HPMS) Fiscal Soundness module supports the Centers for Medicare and Medicaid Services' (CMS) ability to collect, store, and review audited annual financial information submitted by Medicare Advantage Organizations (MAOs), Prescription Drug Plans, 1876 Cost Plans, Medicare-Medicaid Plans (MMPs), and Programs of All Inclusive Care for the Elderly (PACE). The Fiscal Soundness module supports tracking and monitoring of CMS fiscal soundness review activities. In addition, the module serves as a data repository for all historical and current MA, 1876 Cost Plans, PACE and Part D financial information and review history.

Note: Contract Year "20XX" in screen prints represents the latest CY 2018. Screen prints and test contract numbers contained in this User Guide are not intended to display complete functionality or actual contracts, and are for demonstration purposes only.

### 1.1 Accessing HPMS

To access the HPMS, Plan users must have a CMS HITS User ID, and must have Internet access. If you have any questions about your connectivity or do not have access to the appropriate contracts, please send your questions to <a href="https://example.com/hPMS\_Access@cms.hhs.gov">https://example.com/hpms\_hpm.hhs.gov</a>.

If you have any questions about the Fiscal Soundness Reporting Requirements contained within, please send your questions to FinancialReview@cms.hhs.gov or your Financial Management Specialist.

#### 1.2 Accessing the Fiscal Soundness Module

- 1. Logon to HPMS and select "Fiscal Soundness" from the "Monitoring" section of the main menu toolbar.
- 2. The Fiscal Soundness Start page (**Figure 1**) displays. From this page, you have the option to select navigation links from the Fiscal Soundness Secondary Menu.

Note: The following pages have the ability to be saved as a Favorite within the HPMS site.

- Submission of Financial Information
- Submission of Extension Requests
- Reports

Figure 1: Fiscal Soundness Start Page



# 1.3 Who's Required to Submit?

The contract types listed below are required to submit their financial information. These include active contracts that have not been terminated and have a NAIC number assigned to the profile (contracts must indicate if no NAIC number is assigned) that belong to the following plan types:

- HMO
- HMOPOS
- Local PPO
- Fallback
- PSO (State License)
- MSA
- RFB PFFS
- PFFS
- 1876 Cost
- National PACE
- Medicare Prescription Drug Plan
- Employer/Union Only Direct Contract PDP
- Regional PPO

- Employer/Union Only Direct Contract PFFS
- Employer/Union Only Direct Contract LPPO
- RFB HMO
- RFB HMOPOS
- RFB Local
- RFB PSO (State License)
- Financial Alignment HMO
- Financial Alignment HMOPOS
- Financial Alignment PPO

# 1.4 Submission Types

CMS requires organizations to submit financial information at certain intervals (e.g. Submission Types) throughout each year:

- Audited Annual The audited annual (AA) financial statement covers the closure of the previous fiscal year
- **Reporting Period Ending 3/31** For quarters ending between 1/1 3/31
- **Reporting Period Ending 6/30** For quarters ending between 4/1 6/30
- **Reporting Period Ending 9/30** For quarters ending between 7/1 9/30
- **Reporting Period Ending 12/31** For quarters ending between 10/1 12/31. PACE contracts only.

Note: Each Submission Type has a Period End Date (PED) and a Period Due Date (PDD). For more information on Submission Types, PEDs, and PDDs please see Section 6. Organizations may refer to the CY 2018 Fiscal Soundness Reporting Requirements (FSRR) located in the Documents and Forms section of the Fiscal Soundness Module for fiscal soundness submission deadlines.

#### 1.5 Extensions

When Non-PACE organizations need more time to submit their audited annual or quarterly financial statements, Plan users may submit extension requests. Once extension requests are submitted, CMS will review the request and approve/deny it.

Note:

Extension Requests can be submitted for one or multiple groups of contracts

- Upon approval, the extension date overrides the original PDD for the Contract Year/Submission Period/Contract(s).
- Regular and Perennial Extensions exist. Perennial extensions are permanent extension requests that carry forward to future Contract Years.
- The exception to the above statement is when an organization is requesting an extension for a new contract linked to the same NAIC number of an existing contract. A new extension request must be submitted for review and approval.

### 1.6 Contract Grouping

Most licensed insurance companies have been issued a National Association of Insurance Commissioners (NAIC) number. CMS requires that ALL organizations enter the NAIC number in HPMS for each contract number as well as each Parent Organization. For those organizations that do not have a NAIC number for the contract and/or Parent Organization, you must indicate such in the Contract Management module. Organizations that have not completed the NAIC data entry in a timely fashion will **not** be able to complete their fiscal soundness submissions.

Organizations can access the NAIC data entry fields by navigating the following path in HPMS:

HPMS Start Page > Contract Management > Basic Contract Management > Select Contract Number > NAIC Data.

#### Note:

- *Groups are determined based on NAIC numbers.* 
  - If a contract does not have a NAIC number and needs to be grouped with another contract, an alternate NAIC is assigned to the contract.
- When contracts are not under the same Parent Organization but have a relationship, they are assigned a Joint Venture NAIC number. For Joint Venture entities, the system validates the grouping based on the Joint Venture NAIC number.
- Groups can change over time. When this happens, and the change occurred after a submission (financial or extension request), the page will alert you that the group has changed.

# 1.7 Understanding the Review Status

The Review Status indicates the current disposition of the financial submission. A complete status listing is provided below:

- **Not Reviewed** This status is assigned by the system when an organization submits a fiscal soundness submission for review. This status is assigned by the system only.
- **Pending** Reviewed, but missing information (e.g. Audited Annual Financial Statement) or unable to review due to receiving out of sequence (e.g. Quarterly submission prior to AA review).
- **Resubmit** Resubmission has been requested due to incomplete/incorrect data.
- **Meets** Meets CMS's fiscal soundness requirements.
- Meets Based on Parent Meets CMS's fiscal soundness requirements based on the Parent Organization's financials statements.
- **Does Not Meet** Does not meet CMS's fiscal soundness requirements.
- **Reviewed** Reviewed, but no financial statements are available for the legal entity (e.g. new organization without operations for the Reporting Period End Date).
- **Did Not Resubmit** Plan did not resubmit as requested within the 10 day window. This status is assigned by the system only.

#### 1.8 Understanding the Extension Status

The Extension Status indicates the current disposition of the financial submission. A complete status listing is provided below:

- **Not Started** This status is assigned by the system when an organization submits an extension request for review. This status is assigned by the system only.
- In Review CMS began review of the request, but did not assign a final status.
- **Approved** Approved based on CMS guidelines.
- **Denied** Denied by CMS.
- Withdrawn Plan or CMS user no longer requires the extension request.

# 1.9 Email Notifications

The following notification events occur within this module:

- Required to Submit Quarterly Financial Statements
- Resubmit
- Extension Approval
- Extension Denial
- Extension Request Submitted

In addition, the following notification events are triggered on a nightly basis:

- 14 days in advance of any due date
- 3 days after due date
- 14 days after due date
- 21 days after due date
- 100 days after due date

#### 2 Submission of Financial Information

The purpose of the **Submission of Financial Information** function is to submit financials for review. Users have three submission choices:

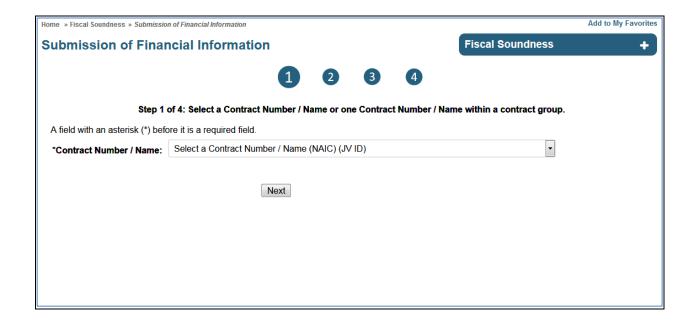
- Submit New First time submitting for a given contract year/submission type/contract.
- Update Updating an existing submission after submission but before the deadline (PDD).
- Resubmit Updating an existing submission after CMS has requested resubmission.

#### 2.1 Submit New

**How to Submit New Financial Information:** 

- 1. Select **Submission of Financial Information** from the secondary menu.
- 2. On the Submission of Financial Information page (Figure 2), select desired Contract Number/Name or one from the contract group.

Figure 2: Submission of Financial Information Page



- 3. Then select **Next.**
- 4. On the Select Reporting Period page (Figure 3) or (Figure 4), select Submit New under the desired reporting period.

Figure 3: Select Reporting Period Page (Non-PACE)

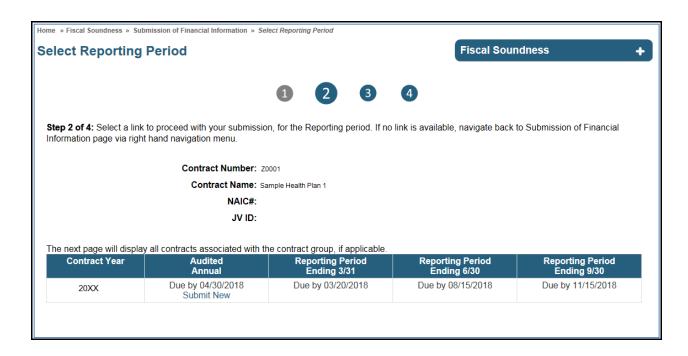
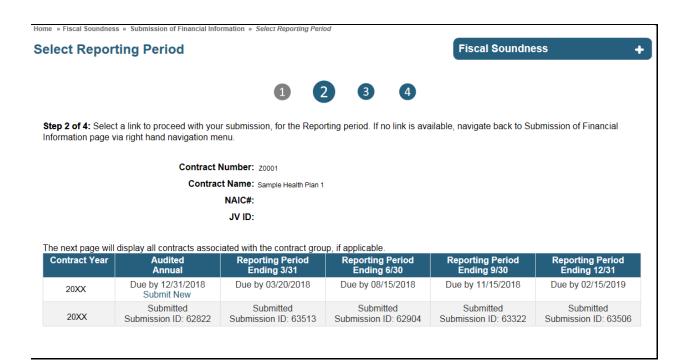


Figure 4: Select Reporting Period Page (PACE)



Fill out the **New Submission** form displayed in (**Figure 5**) or (**Figure 6**).

Note: If there are multiple contracts under the selected contract's NAIC number, the system will auto-populate the contracts from the NAIC group.

- a. **Total Assets** This total amount is found on the Balance Sheet.
- b. **Total Liabilities** This total amount is found on the Balance Sheet. For PACE or 1876 Cost Plan contracts, this figure includes Subordinated/Guaranteed Debt.
- c. Subordinated Debt/Guaranteed Debt (Included in Total Liabilities) PACE or 1876
  Cost Plan contracts only. Subordinated debt is defined as an unsecured debt whose repayment to its Parent Organization ranks after all other debts have been paid when the subsidiary files for bankruptcy. An example of subordinated debt is when the Parent Organization loans money to the PACE organization or Cost Plan to pay its debts. The PACE organization or Cost Plan only needs to repay the Parent Organization after all of its other liabilities have been satisfied. Guaranteed debt is defined as secured debt in which another entity promises to pay a loan or other debt if the organization that borrowed the money fails to pay. An example of guaranteed debt is when the PACE organization or Cost Plan obtains a loan from a bank and another entity signs on to guarantee payment of all, or a portion of, the loan. In the event of bankruptcy or default, the other entity will make payments on the loan on behalf of the PACE organization or Cost Plan to ensure the debt is satisfied.

Note:

- When a value of zero is entered, the system will alert the user.
- When entering a numeric value other than zero, users are expected to include a signed Subordinated/Guaranteed Debt Attestation Form zipped with their file upload. The form can be accessed by selecting Subordinated/Guaranteed Debt Attestation Form at the bottom of the page or in the secondary menu.
- d. **Net Income** (**Loss**) This is the portion of revenue remaining after all the expenses and taxes have been deducted. This amount is found as a line item on the Revenue and Expense Statement. This amount can also be a negative number. In that case, it's called a Net Loss.
- e. **Cash Flow from Operations** This amount is found on the Cash Flow Statement. It is the first sub-totaled figure before accounting for cash flow from investing and financing activities.
- f. **File** Upload the applicable financial statement(s).

Note:

• Accepted file types are .DOC, .DOCX, .PDF and .ZIP.

- Filename cannot contain any of the following characters: pound (#), percent (%), semi-colon (;), plus (+), ampersand (&), and double periods (..).
- *Maximum file size allowed is 10MB.*
- Uploaded file name length should not exceed 150 characters.
- g. **Subordinated/Guaranteed Debt Attestation** PACE contracts only. When entering a numeric value other than zero, users are required to indicate that the Subordinated/Guaranteed Debt Attestation form has been included in their submission by selecting the Subordinated/Guaranteed Debt Attestation checkbox.

#### Note:

• 1876 Cost Plans should contact CMS regarding Subordinated/Guaranteed Debt Attestation.

Figure 5: New Financial Submission Page (Non-PACE)

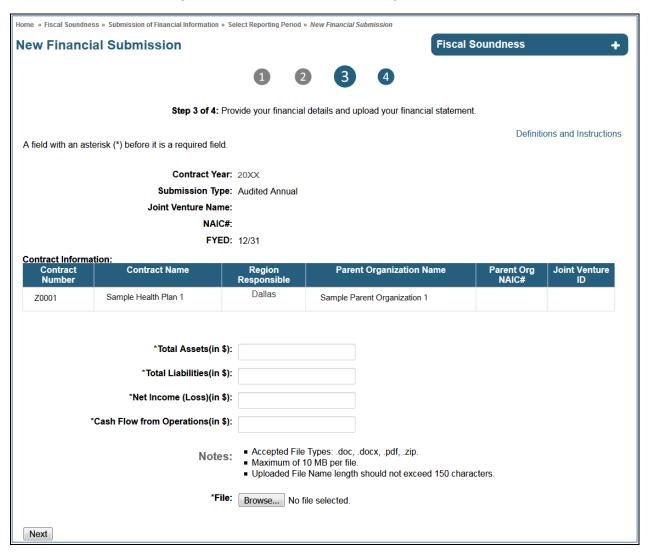
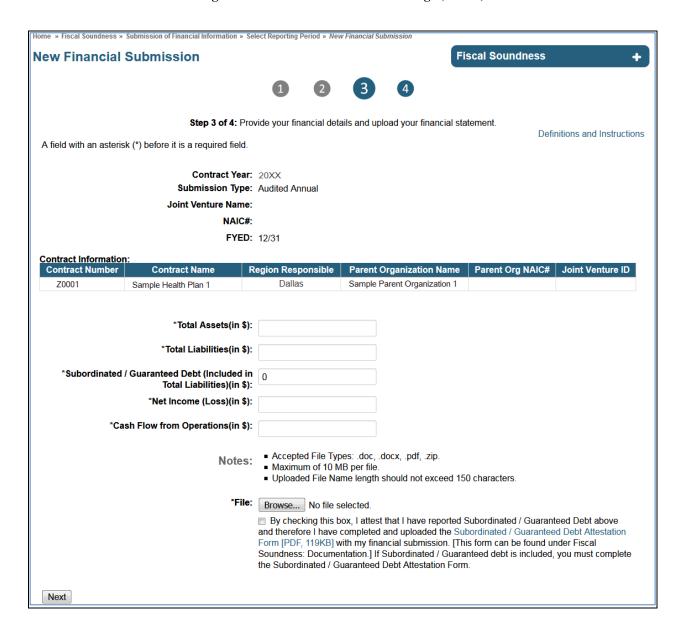


Figure 6: New Financial Submission Page (PACE)



- 5. After completing all information, select **Next**.
- 6. Review the information provided on the **New Financial Submission Verification page (Figure 7) or (Figure 8)**.
  - a. If further changes need to be made, select **Back**.
  - b. If the information is correct, select **Submit**

Figure 7: Verify Financial Information Page (Non-PACE)

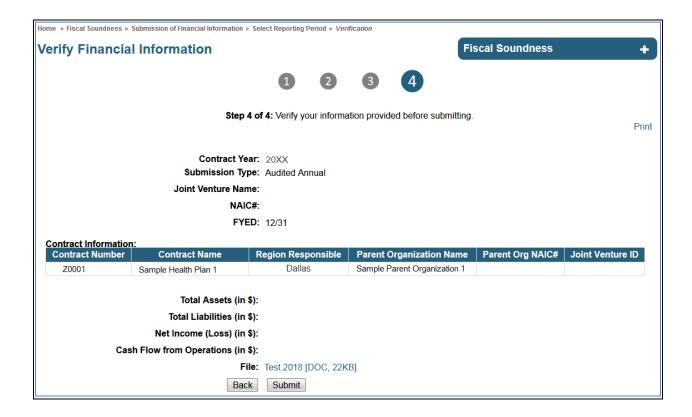
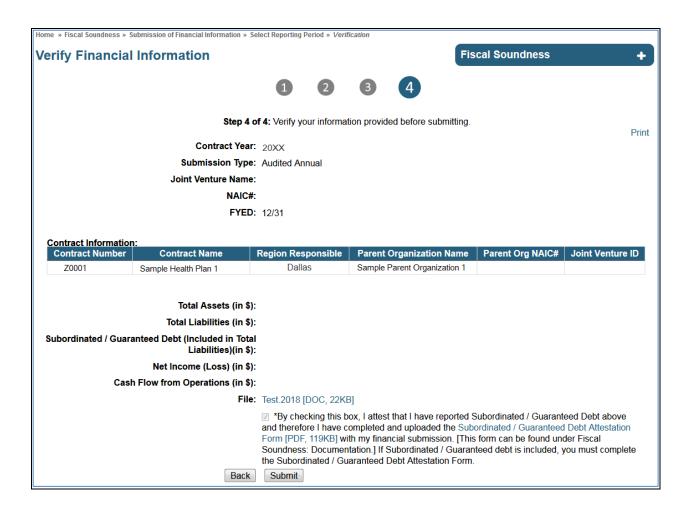


Figure 8: Verify Financial Information Page (PACE)



7. An attestation of the submission is required (**Figure 9**). Select the **OK**.

Figure 9: New Submission Attestation Popup (Audited Annual)



Upon submission, the Confirmation page is displayed (Figure 10).

**Figure 10: Confirmation Page** 



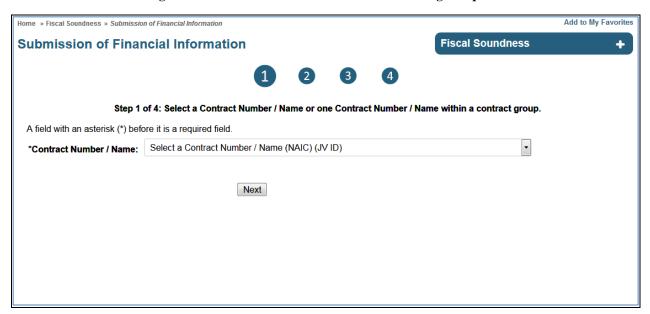
8. Select **Exit to Home Page** to return to the Fiscal Soundness Start Page.

# 2.2 Update

#### To update financial information:

- 1. Select **Submission of Financial Information** from the secondary menu.
- 2. On the **Submission of Financial Information** page, select desired **Contract Number/Name or one from the contract group.**

Figure 11: Submission of Financial Information Page - Update



3. Then select **Next.** 

On the **Select Reporting Period page** (**Figure 12**) or (**Figure 13**), select **Update** under the desired reporting period and select **Continue**.

Note: The submission will not be available to update if it has been reviewed by CMS, regardless of PDD.

Figure 12: Select Reporting Period – Update (Non-PACE)

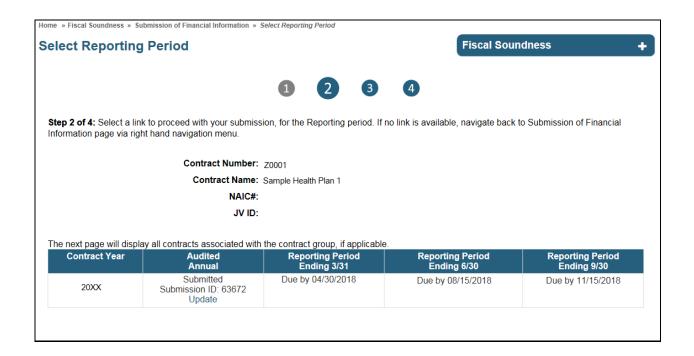
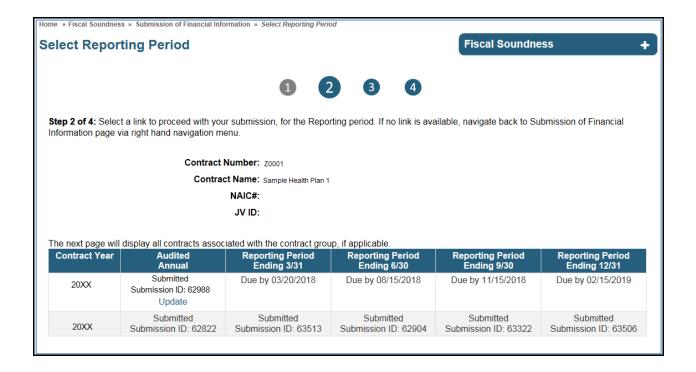


Figure 13: Select Reporting Period – Update (PACE)



4. On the **Update Financial Submission page**, you may **Update** values and/or upload file from previous submissions.

Note: If a previously uploaded file needs to be replaced/deleted, please upload a new zip file, including all the necessary documents. The newly uploaded file will replace the previous file.

Figure 14: Update Financial Submission Page (Non-PACE)

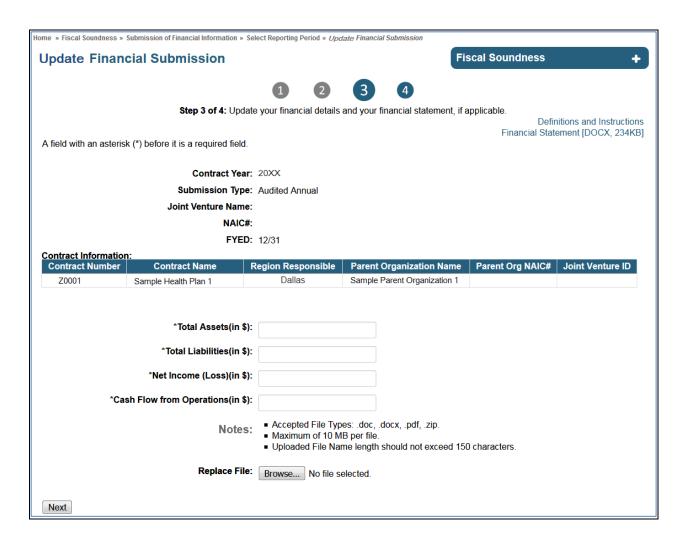
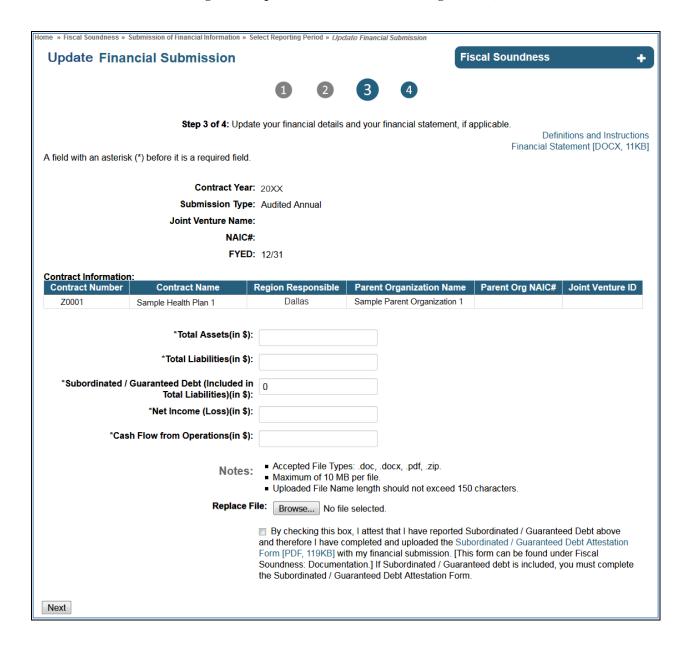


Figure 15: Update Financial Submission Page (PACE)



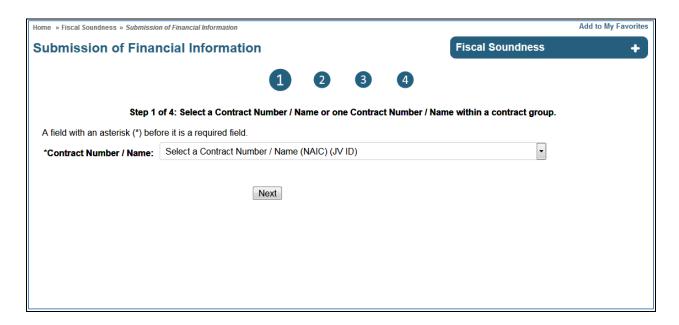
5. Select **Next** and continue through the verification, attestation, and confirmation (See Section 2.1 starting with step 7).

# 2.3 Resubmit

#### To Resubmit Financial Information:

- 1. Select **Submission of Financial Information** from the secondary menu.
- 2. On the Submission of Financial Information page, select desired Contract Number/Name or one from contract group.

Figure 16: Submission of Financial Information Page - Resubmit



3. Then select **Next.** 

On the **Select Reporting Period page (Figure 17)** or **(Figure 18)**, select **Resubmit** under the desired reporting period and select **Continue**.

Figure 17: Select Reporting Period – Resubmit (Non-PACE)

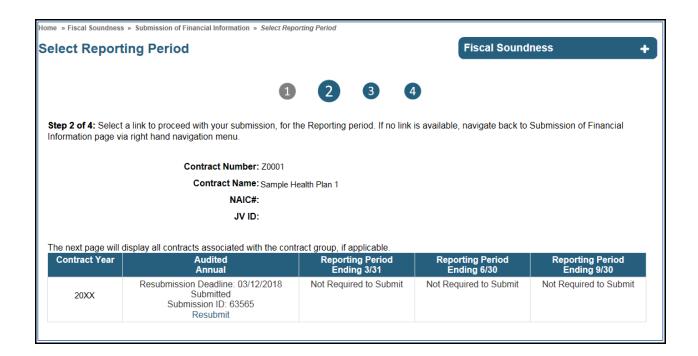
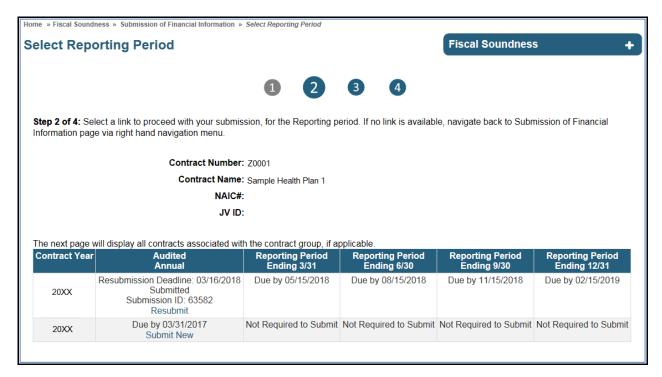


Figure 18: Select Reporting Period – Resubmit (PACE)



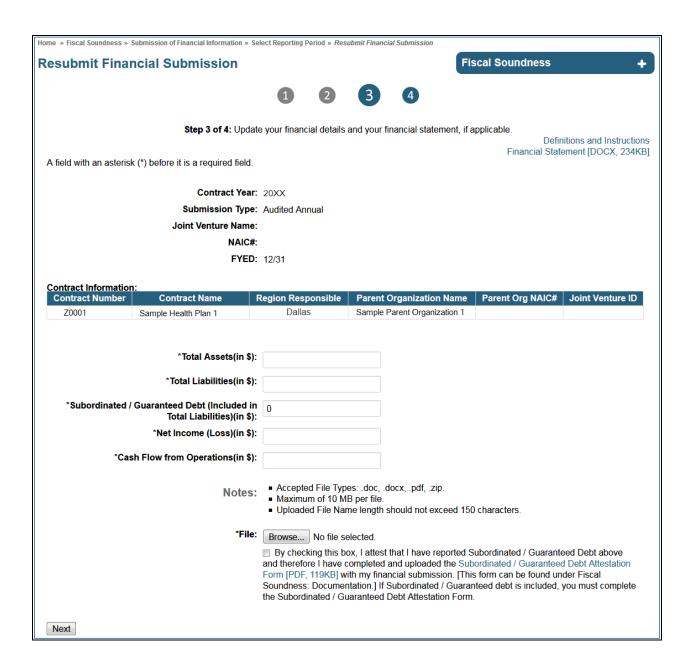
4. On the Resubmit Financial Submission page, you may resubmit values and/or upload file from previous submissions.

Home » Fiscal Soundness » Submission of Financial Information » Select Reporting Period » Resubmit Financial Submission **Resubmit Financial Submission Fiscal Soundness** + Step 3 of 4: Update your financial details and your financial statement, if applicable. **Definitions and Instructions** Financial Statement [DOCX, 234KB] A field with an asterisk (\*) before it is a required field. Contract Year: 20XX Submission Type: Audited Annual Joint Venture Name: NAIC#: FYED: 12/31 Contract Information: Contract Number Region Responsible **Parent Organization Name** Parent Org NAIC# **Contract Name** Z0001 Sample Parent Organization 1 Sample Health Plan 1 \*Total Assets(in \$): \*Total Liabilities(in \$): \*Net Income (Loss)(in \$): \*Cash Flow from Operations(in \$): Accepted File Types: .doc, .docx, .pdf, .zip.
 Maximum of 10 MB per file. Notes: Uploaded File Name length should not exceed 150 characters. Replace File: Browse... No file selected.

Figure 19: Resubmit Financial Submission Page (Non-PACE)

Next

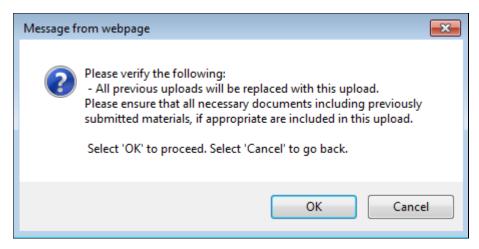
Figure 20: Resubmit Financial Submission Page (PACE)



5. Select Next and continue through the verification, attestation, and confirmation (See Section 2.1 starting with step 7).

Note: If a previously uploaded file needs to be replaced/deleted, please upload a new zip file, including all the necessary documents. The newly uploaded file will replace the previous file.

Figure 21: Resubmit pop-up



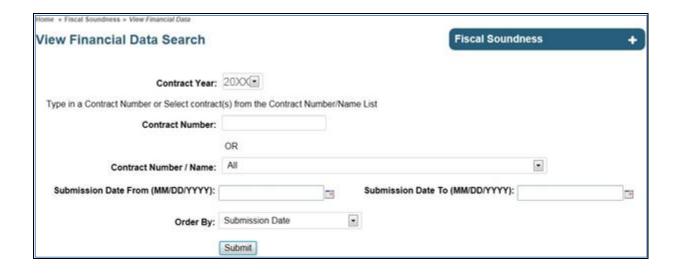
#### **3** View Financial Data

The purpose of the **View Financial Data** function is to view the financials for existing submissions.

To view a submission:

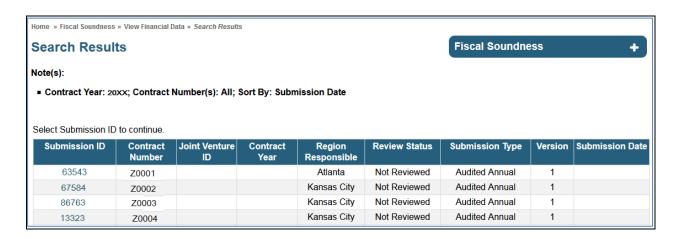
- 1. Select **View Financial Data** from the secondary menu.
- 2. On the **View Financial Data Search** page (**Figure 22**), populate search criteria (Optional).

Figure 22: View Financial Data Search Page



- 3. Select Submit.
- 4. On the **Search Results** page (**Figure 23**) select the appropriate **Submission ID**.

Figure 23: Search Results Page



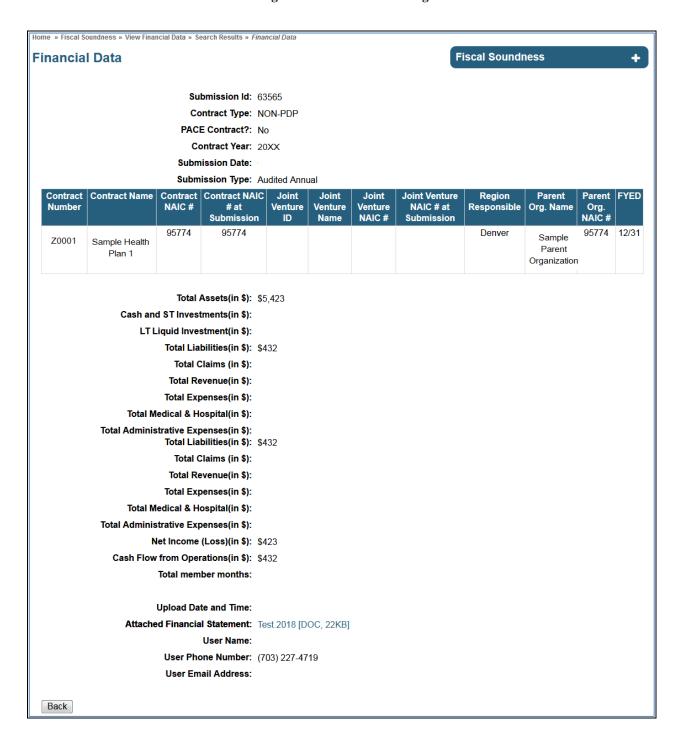
5. The **Financial Data Page (Figure 24)** displays submission information for the selected Submission ID.

Note: The following fields were available for submissions prior to 2010. These fields will display if financial data had been entered at that time:

- a. Cash and ST Investments
- b. LT Liquid Investments (Non-PDP only)
- c. Total Claims (Non-PDP only)
- d. Total Revenue
- e. Total Expenses
- f. Total Medical and Hospital (Non-PDP only)
- g. Total Administrative Expenses
- h. Total Member Months (Non-PDP only)
- i. Total Current Assets (PDP only)
- j. Total Current Liabilities (PDP only)
- k. Drug Benefit Expenses (PDP only)

#### l. Drug Benefit Revenues (PDP only)

Figure 24: Financial Data Page



# 4 Submission of Extension Requests

The purpose of the **Submission of Extension Requests** function is to submit extension requests for review. Users have two extension request choices:

- **Request New Extension** First time submitting an extension request for a given contract year/submission type/contract.
- Update / Withdraw Extension Updating an existing extension request prior to CMS Review.

Note: Once approved, Extension dates are visible in the following locations: Review Status Report (Section 5.1).

### 4.1 New Extension Requests

To submit a new extension request:

- 1. Select **Submission of Extension Requests** from the secondary menu.
- 2. On the Extension Requests page (Figure 25), select Request New Extension and select Continue.

Figure 25: Extension Requests Page



- 3. Select No for **PACE Contracts**.
- 4. On the **Submit Extension Request** page (**Figure 26**) fill out the new extension form.
  - a. **Submission Type** The submission type for which the extension is being made. For more information, see Section 1.6.
  - b. **Contract Name / Number –** Contracts that are assigned to the user currently logged in.

Note: If applicable, contracts must be submitted in NAIC groups. For more information, see Section 1.6.

 $c. \quad \textbf{Requested Extension Date} - Extension \ Date \ requested.$ 

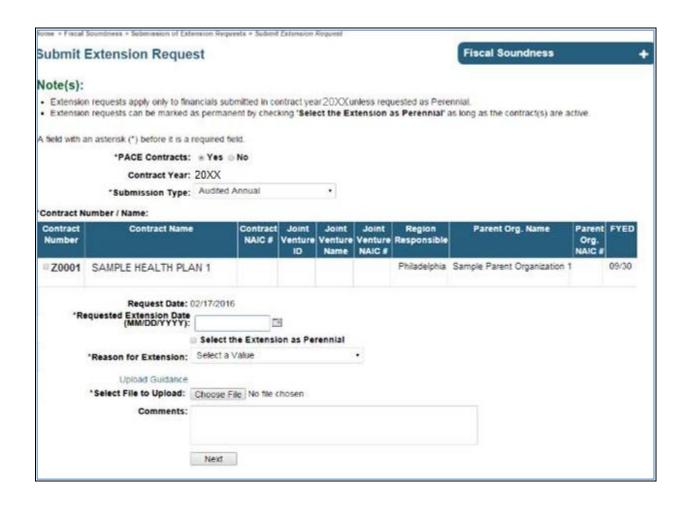
Note: Must be greater than or equal to the current date.

- d. **Select the Extension as Perennial** Select this box if this is a perennial extension request. A perennial request is considered a permanent one. Please refer to the instructions in Section 1.5.
- e. **Reason for Extension** Provide reason for extension request.
- f. **File** Upload the applicable financial statement(s) and supporting documentation (e.g. NAIC or State Filing Checklist Form).

Note:

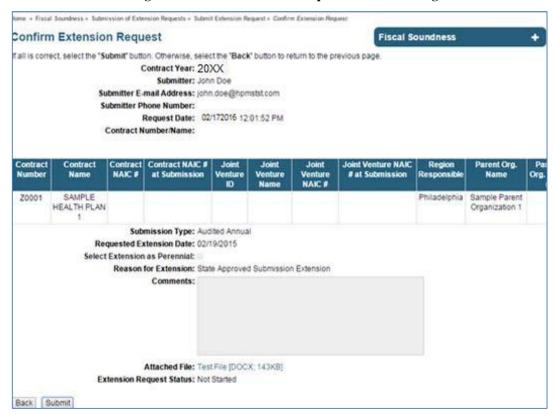
- Accepted file types are .DOC, .DOCX, .PDF and .ZIP.
- Filename cannot contain any of the following characters: pound (#), percent (%), semi-colon (;), plus (+), ampersand (&), and double periods (..).
- Maximum file size allowed is 10MB.
- Uploaded file name length should not exceed 150 characters.
- g. **Comments** When the Reason for Extension is Other, comments are required.

Figure 26: Submit Extension Request Page



- 5. Select Next.
- 6. Review the information provided on the **Submit Extension Request Verification** page (**Figure 27**).
  - a. If further changes need to be made, select **Back**.
  - b. If the information is correct, select **Submit**.

Figure 27: Submit Extension Request Verification Page



7. Upon submission, the Confirmation page is displayed (Figure 28).

Note: Once an extension request is submitted for a contract/submission type, you may not submit additional extension requests for the same contract/submission type until the prior extension request have been approved, denied, or withdrawn.

Figure 28: Extension Request Confirmation Page



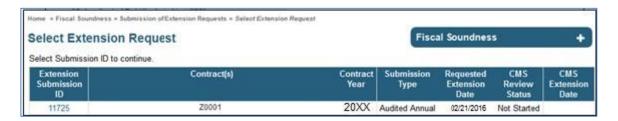
# 4.2 Update / Withdraw Extension Requests

To update / withdraw an extension request:

- 1. Select **Submission of Extension Requests** from the secondary menu.
- 2. On the Extension Requests page (Figure 25), select Update / Withdraw Extension and select Continue.
- 3. On the **Select Extension Request Search Results** page (**Figure 29**), locate the appropriate extension and select the **Extension Submission ID**.

*Note: The submission will not be available to update if it has been reviewed by CMS.* 

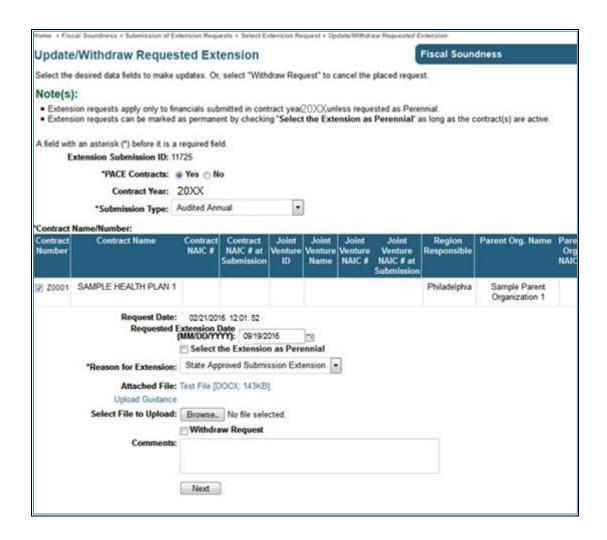
Figure 29: Select Extension Request Page



 On the Update / Withdraw Request Extension page (Figure 30), you may update values and/or upload file from the previous extension request or withdraw the request by selecting Withdraw Request.

Note: If a previously uploaded file needs to be replaced/deleted, please upload a new zip file, including all of the necessary documents. The newly uploaded file will replace the previous file.

Figure 30: Update/Withdraw Extension Request Page



5. After completing all information, select **Next**.

Note: When withdrawing a request, the system prompts you with an additional pop-up message during submission, asking you to confirming the withdrawal. Once a request is withdrawn, it is no longer editable by you or by CMS.

- 6. Review the information provided on the **Submit Extension Request Verification** page (**Figure 27**).
  - a. If further changes need to be made, select **Back**.
  - b. If the information is correct, select **Submit**.
- 7. Upon submission, the Confirmation page is displayed (Figure 28).

# 5 Reports

Reports are accessible from the Reports page (**Figure 31**). To view the Reports page, select Reports from the secondary menu.

Note: For all reports, any column that is blank means no data has been submitted for the given contract (and if applicable, to the Joint Venture entities). All reports are exportable to MS Excel.

Figure 31: Reports Page



# 5.1 Review Status Report

The Review Status Report displays all expected submissions for contracts and the status of the submissions.

To obtain the Review Status Report:

- 1. Select Review Status Report.
- 2. On the **Review Status Report** page, populate search criteria (Optional) (**Figure 32**).
- 3. Select Submit.

Figure 32: Review Status Report Search Criteria Page

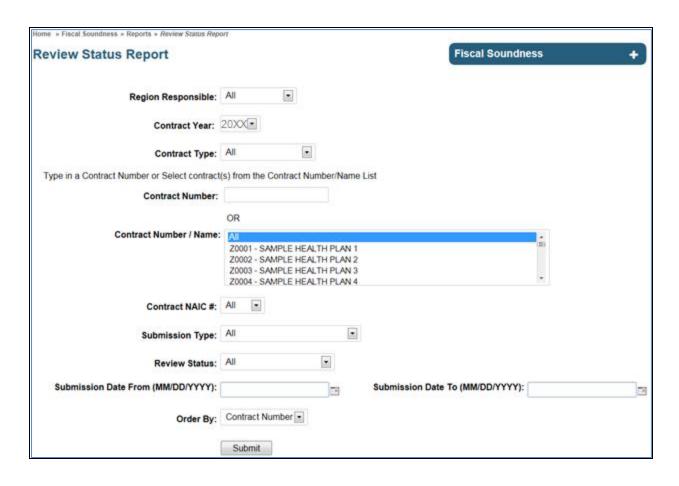


Figure 33: Review Status Report Page



#### **6** Documents and Forms

The **Documents and Forms** section, accessible from the Fiscal Soundness Secondary Menu, contains the following items:

- **FSRR Final Memo for 2018 FSM Release** This includes any information that CMS would like to share with Plan Organizations regarding the new submission year.
- CY 2018 Fiscal Soundness Reporting Requirements (FSRR) This document provides filing
  instructions/guidance to upload financial statements for the Plan Organizations.
- **Fiscal Soundness Requirements and Monitoring** This document summarizes the potential actions that CMS may take to address organizations not meeting fiscal soundness requirements.
- Clarification of Fiscal Soundness Requirements This document provides clarification on the fiscal soundness requirements.
- Annual Verification of Parent Organization and Legal Entity Name This document
  includes instructions for reviewing parent organization and legal entity name and reporting
  corrections, if applicable.
- **Plan User Guide** The Fiscal Soundness Module User Guide is an all-inclusive document incorporating the various steps for submitting new financial statements and data elements.
- Subordinated/Guaranteed Debt Attestation Form If a PACE organization or 1876 Cost Plan has a subordinated/guaranteed debt arrangement, CMS requires the Subordinated/Guaranteed Debt Attestation Form to be submitted.

# 7 Contacts

Table 1: Fiscal Soundness Contacts – By Type or CMS Region ("Region Responsible" under "Plan Management Data")

Contacts	By Type or CMS Region ("Region Responsible" under "Plan Management Data")
Joe Millstone	All Prescription Drug Plans (PDPs) and MA Organizations
Joseph.Millstone@cms.hhs.gov	covered under a Financial Report that includes a PDP
410-786-2976	
Andrew Chu	Technical HPMS Contact
Andrew.Chu@cms.hhs.gov	
410-786-0488	

Table 2: Fiscal Soundness Contacts – Medicare Advantage Organizations Not Covered in Table Above (by "Region Responsible" under "Plan Management Data")

Contacts	Medicare Advantage Organizations Not Covered in Table Above (by "Region Responsible" under "Plan Management Data")
Emily Davis  Emily.Davis@cms.hhs.gov  410-786-1454	PACE Plans Region 02 – New York
Mark Keller  Mark.Keller@cms.hhs.gov  410-786-0107	Region 01 - Boston Region 06 - Dallas Region 09 - San Francisco Region 10 - Seattle
Joe Millstone  Joseph.Millstone@cms.hhs.gov  410-786-2976	Region 03 - Philadelphia Region 04 – Atlanta
David Stysley <u>David.Stysley@cms.hhs.gov</u> 410-786-8948	
Venita Scott  Venita.Scott@cms.hhs.gov  410-786-3139	PACE Plans Region 05 - Chicago Region 08 - Denver
Christa Zalewski Christa.Zalewski@cms.hhs.gov 410-786-1971	PACE Plans Region 07 – Kansas City

# 8 PRA Disclosure Statement

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0938-0469 (Expires: October 31, 2019 pending approval from OMB). The time required to complete this information collection is estimated to average 20 minutes per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have comments concerning the accuracy of the time estimate(s) or suggestions for improving this form, please write to: CMS, 7500 Security Boulevard, Attn: PRA Reports Clearance Officer, Mail Stop C4-26-05, Baltimore, Maryland 21244-1850.