

FAQ

Submitting Number of Uncovered Month to CMS

Version 3, April 1, 2011

The process explained in this document does not change or circumvent your normal batch constructions or processes for communicating with CMS via MARx.

Only plans offering Part D can submit NUNCMO information to CMS.

You must first determine the type of transaction you will be submitting to CMS through MARx. The following transactions types are available to you:

- a. Using an Enrollment transaction :
Employer Group Retroactive Enrollment (Transaction **60**), Enrollment (Transaction **61**), Incomplete Enrollment Requests and TRC 127 process transactions that could not be submitted timely using the normal enrollment transaction (Transaction **62**), Plan Benefit Package (PBP) Enrollment (Transaction **71**)

NOTE: Bear in mind that all relevant enrollment transaction data must also be included when submitting an Enrollment Transaction 60, 61, 62, or 71. This includes the accurate effective date of the enrollment.

- b. Number of Uncovered Months (NUNCMO) change (Transaction **73**). This transaction is used to make corrections to the number of uncovered months for members currently or previously enrolled with your organization

Refer to the chart at the end of this document to determine the type of update required for your request. See the MARx Batch Input Transaction Data File record layout in Appendix E in the Plan Communications User Guide for more detailed information on data fields, their description and their appropriate formats.

The following is a collection of questions CMS has received regarding NUNCMO. Examples are included with each answer, where appropriate.

The following are the valid values for the Creditable Coverage Flags and what they represent:

- Y** - Yes - The beneficiary had creditable coverage. "Y" is only submitted when the NUNCMO value on the transaction is equal to zero. "Y" is used to report a value of zero and to correct an existing NUNCMO value to zero.
- N** - No - The beneficiary did not have creditable coverage. "N" is only submitted when the NUNCMO value on the transaction is greater than zero. "N" can be used in three different situations.
- to report a value greater than zero
 - to correct an existing value of zero to a value greater than zero
 - to correct an existing value greater than zero to a different value greater than zero.
- R** - Reset - An existing NUNCMO value greater than zero requires an end date due to a second IEP/D or the start of LIS. "R" is only submitted when the NUNCMO value on the row in the NUNCMO table on the eligibility screen in CMS systems to be changed is not equal to zero and the existing, valid NUNCMO requires the addition of an end date. "R" may not be used to **CORRECT** an existing NUNCMO value that has been determined to be incorrect.
- U** - Undo Reset – A previously submitted and accepted reset ("R") is erroneous and must be corrected. The NUNCMO value on the transaction is always zero. Additional transactions may be necessary to complete correcting the NUNCMO information. **Only submit an UNDO to correct a Reset Row in the NUNCMO table on the eligibility screen in CMS systems.** This will change the value back to the previous value.

A chart that contains more information about the usage of the Creditable Coverage Flag field is located at the end of this document.

For each example that follows, the changes are to a single ROW of uncovered months data. The change is not to correct the TOTAL number of uncovered months. For example:

Number of Uncovered Months					
Start Date	Indicator	Number of Uncovered Months	Total Number of Uncovered Months	Record Add-TimeStamp	Record Type
08/01/2008	I	6	6	09/04/2008 16:5:18	v
01/01/2009	I	5	11	06/22/2009 11:0:29	v
07/01/2009	R	0	0	10/20/2009 16:0:1	v

In the example above, if you need to change the NUNCMO value for 1/1/09 from 5 to 7, you need to submit a 73 transaction with an Effective Date = 1/1/2009, Credible Coverage = 'N' and the NUNCMO value = '007'. This submission will automatically change the **TOTAL** NUNCMO for the beneficiary to 13.

Number of Uncovered Months					
Start Date	Indicator	Number of Uncovered Months	Total Number of Uncovered Months	Record Add-TimeStamp	Record Type
08/01/2008	I	6	6	09/04/2008 16:5:18	v
01/01/2009	I	7	13	06/22/2009 11:0:29	v
07/01/2009	R	0	0	10/20/2009 16:0:1	v

If you need to change the NUNCMO value to 8/1/08 from 6 to 3, you need to submit a 73 transaction with an Effective Date = 8/1/2009, Creditable Coverage = 'N' and the NUNCMO value = '003'. This submission will automatically change the **TOTAL** NUNCMO for the beneficiary to 10.

Number of Uncovered Months					
Start Date	Indicator	Number of Uncovered Months	Total Number of Uncovered Months	Record Add-TimeStamp	Record Type
08/01/2008	I	3	3	09/04/2008 16:5:18	v
01/01/2009	I	7	10	06/22/2009 11:0:29	v
07/01/2009	R	0	0	10/20/2009 16:0:1	v

Q01a: How do I submit a Number of Uncovered Months utilizing a Transaction 60, 61, 62, or 71 and at the time of submittal the **Number of Uncovered Months is not known?** or

Q01b: How do I submit a Number of Uncovered Months utilizing a Transaction 60, 61, 62, or 71 and the **Number of Uncovered Months is known to be Zero?**

A01a & A01b:

1. Enter a “Y” in your record in the Creditable Coverage Flag field (position 94 of the record).
2. Enter Zero (000) in the Number of Uncovered Months field (positions 95-97).
3. Enter the effective date (the enrollment effective date) in your record in the Effective Date field (positions 64-71).

Example 01a:

John Doe enrolls into Plan A with an effective date of June 1, 2010 and, due to the 7 day enrollment transaction submission requirement, you are not sure how many, if any, uncovered months the beneficiary may have at the time you submit the enrollment. Submit the enrollment transaction to CMS using “Y” for the Creditable Coverage Flag field, the Number of Uncovered Months field equal to Zero (000), and the Effective Date equal to the effective date of the enrollment (20100601). Later, you confirm that he had three (3) uncovered months following the requirements in Chapter 4. You will then submit a change transaction (Transaction 73) to CMS to correct the number of uncovered months from Zero (000) to Three (003). Question number 3 provides an example on how to process this change transaction.

Example 01b:

John Doe enrolls into Plan A with an effective date of June 1, 2010 and the plan has confirmed that he doesn’t have any uncovered months. Submit the enrollment transaction to CMS using “Y” for the Creditable Coverage Flag field, set the Number of Uncovered Months field equal to Zero (000), and set the Effective Date equal to the date of the enrollment, 20100601 (the effective date of the enrollment). Since the value of zero is accurate, a subsequent code 73 is not necessary.

Q02: *How do I submit a Number of Uncovered Months utilizing an Enrollment Transaction (60, 61, 62, or 71) and **there are a confirmed Number of Uncovered Month(s) greater than zero?***

A02:

1. Enter an "N" in your record in the Creditable Coverage Flag field (position 94 of the record).
2. Enter the correct number of months in the Number of Uncovered Months field (positions 95-97). Note: the number must be greater than Zero (000).
3. Enter the effective date (equal to the enrollment effective date) in your record in the Effective Date field (positions 64-71).

Example 02:

John Doe enrolls into Plan A with an effective date of June 1, 2010 and has confirmed that he has three (3) uncovered months. You submit the transaction to CMS using an "N" for the Creditable Coverage Flag field, set the Number of Uncovered Months field equal to Three (003) and set the Effective Date equal to 20100601 (the effective date of the enrollment).

Q03: *How do I **correct** an existing Number of Uncovered Months from the value already in CMS systems to a different non-zero value due to plan error or reconsideration decision?*

A03:

1. Submit a change transaction to CMS (Transaction 73).
2. Enter an "N" in your record in the Creditable Coverage Flag field (position 94 of the record).
3. Enter the correct number of months in the Number of Uncovered Months field (positions 95-97). Note: the number must be greater than Zero (000).
4. Enter the effective date in your record in the Effective Date field (positions 64-71). The effective date must match the appropriate effective date in the "Number of Uncovered Months" table on the eligibility screen in CMS systems, (this is usually equal to the enrollment effective date).

Example 03a:

Plan A realizes that although they had entered five (5) Uncovered Months for John Doe when he enrolled in their Plan (with an effective date of June 1, 2010), he really had three (3) Uncovered Months. The submission of five (5) was a Plan error. In order to correct this, the Plan must submit a Transaction 73 to CMS using an “N” for the Creditable Coverage Flag field, set the Number of Uncovered Months field equal to Three (003) and set the Effective Date equal to 20100601.

Example 03b:

Plan A realizes that although they had entered 5 Uncovered Months for John Doe when he enrolled in their Plan (with an effective date of June 1, 2010), the beneficiary really had 7 Uncovered Months (the submission of five (5) was a Plan error). In order to correct this, the Plan must submit a Transaction 73 to CMS using an “N” for the Creditable Coverage Flag field, set the Number of Uncovered Months field equal to seven (007) and set the Effective Date equal to 20100601.

Q04: *How do I **correct** an existing Number of Uncovered Months that is greater than zero which is incorrect due to plan error or reconsideration decision and needs to be corrected to zero?*

A04:

1. Submit a change transaction to CMS (Transaction 73).
2. Enter a “Y” in your record in the Creditable Coverage Flag field (position 94 of the record).
3. Enter a Zero (000) in the Number of Uncovered Months field (positions 95-97).
4. Enter the effective date in your record in the Effective Date field (positions 64-71). The effective date must match the appropriate effective date in row on the “Number of Uncovered Months” table on the eligibility screen in CMS systems, (this is usually equal to the enrollment effective date).

Example 04:

Plan A had entered five (5) Uncovered Months for John Doe when he enrolled in their Plan (with an effective date of June 1, 2010). Several months later, a Reconsideration decision was made that determined that he really had Zero (0) Uncovered Months. In order to correct this, the Plan must submit a Transaction 73 to CMS using a “Y” for the Creditable Coverage Flag field, set the Number of Uncovered Months field equal to Zero (000) and set the Effective Date equal to 20100601.

Q05: *A currently enrolled member has a correct number of uncovered months (greater than zero). The bene is eligible for a 2nd IEP/D. How do I reset the existing Number of Uncovered Months to Zero (000) due to the **additional IEP for Part D**?*

A05:

1. Submit a change transaction to CMS (Transaction 73).
2. Enter an "R" in your record in the Creditable Coverage Flag field (position 94 of the record).
3. Enter a Zero (000) in the Number of Uncovered Months field (positions 95-97).
4. Enter the effective date equal to the 1st day of the month of the new IEP for Part D in your record in the Effective Date field (positions 64-71).

Example 05:

John Doe is entitled to Medicare due to a disability and is currently enrolled in Plan A prior to turning 65. Currently he has six (6) Uncovered Months. Mr. Doe is turning 65 on June 11, 2010. At the start of the new IEP/D period (March 1, 2010), Plan A must submit a Transaction 73 to CMS using an "R" in the Creditable Coverage Flag field, the Number of Uncovered Months field equal to Zero (000) and the Effective Date equal to 20100301. The result will be that John has 6 uncovered months until 3/1/2010, when the 6 ends and the zero starts.

Q06: *How do I reset the existing Number of Uncovered Months to Zero (000) due to an **individual becoming LIS eligible while enrolled in my part D plan**?*

A06:

1. Submit a change transaction to CMS (Transaction 73).
2. Enter an "R" in your record in the Creditable Coverage Flag field (position 94 of the record).
3. Enter a Zero (000) in the Number of Uncovered Months field (positions 95-97).
4. Enter the effective date (equal to the effective start date of LIS eligibility) in your record in the Effective Date field (positions 64-71).

Example 06:

John Doe is currently enrolled in Plan A and currently has 6 Uncovered Months. Mr. Doe has just been determined to be LIS eligible effective July 1, 2010. Plan A must submit a Transaction 73 to CMS using an "R" for the Creditable Coverage Flag field, the Number of Uncovered Months field equal to Zero (000) and the Effective Date equal to 20100701. The result will be that John has 6 uncovered months until 7/1/2010, when the 6 ends and the zero starts.

Q07: *Can I just use an "R" for the Creditable Coverage Flag field and a Zero for Uncovered Months as a default any time I submit an IEP or ICEP?*

A07:

No. The "R" for the Creditable Coverage Flag field is a **RESET** of an existing Number of Uncovered Months that is greater than zero; it adds an end date to the period of time to which the existing Number of Uncovered Months applied. The result will be 2 time periods of NUNCMO. One period where the NUNCMO applies and all LEP is owed, followed by a second period where the NUNCMO no longer applies and there is no longer any LEP owed.

Q08: *If the beneficiary was not enrolled in any Part D plan when the reason for a Reset occurs (such as the start of LIS or the start of the 2nd IEP), what effective date should be submitted?*

A08:

The effective date should be set to the Part D enrollment effective date following the beneficiary's LIS or 2nd IEP event. If the first Part D enrollment period is after the start of LIS or the start of the 2nd IEP is the bene's current enrollment period, submit the transaction in a PROSPECTIVE file. If the first Part D enrollment period after the start of LIS or the start of the 2nd IEP has ended, submit the transaction in a RETRO file. Please refer to the Feb 24, 2009 HPMS memo entitled "Instructions for submitting retroactive enrollment and disenrollment activity" for information about the retro process.

Example 08A:

John Doe was enrolled in a Part D plan (Plan A) from 1/1/09 through 10/31/09. Mr. Doe was determined to be LIS eligible effective January 1, 2010. Mr. Doe is enrolled in a Part D plan (Plan B) on March 1, 2010. Plan B must submit a PROSPECTIVE file using a Transaction 73 to CMS using an "R" for the Creditable Coverage Flag field, the Number of Uncovered Months field equal to Zero (000) and the Effective Date equal to 20100301.

Example 08B:

The current date is 12/01/10. John Doe became LIS on 11/1/09. John then enrolled in a Part D plan from 1/1/10 through 06/30/10. The plan did not know that John Doe became LIS prior to enrollment in their plan. The Plan must submit a RETRO file using a Transaction 73 to CMS using an "R" for the Creditable Coverage Flag field, the Number of Uncovered Months field equal to Zero (000) and the Effective Date equal to 20100101.

Q09: How do I **correct** an erroneous Reset action previously submitted?

A09:

1. Submit a change transaction to CMS (Transaction 73)
2. Enter a "U" in your record in the Creditable Coverage Flag field (position 94 of the record)
3. Enter a Zero (000) in the Number of Uncovered Months field (positions 95-97)
4. Enter the effective date (equal to the effective date of the originally submitted reset "R" transaction) in your record in the Effective Date field (positions 64-71).

(If the erroneous reset should never have been submitted, stop here. The result will be that the end date the RESET had applied will be removed and the NUNCMO value will apply continuously. If the RESET was submitted incorrectly and needs to be changed to a different date, continue to the next step.)

5. Once the 1st 4 steps are successfully completed, create a second code 73, enter an "R" in your record in the Creditable Coverage Flag field (position 94 of the record)
6. Enter a Zero (000) in the Number of Uncovered Months field (positions 95-97)
7. Enter the effective date (equal to the correct effective date of the reset "R" transaction) in your record in the Effective Date field (positions 64-71).

Example 09a:

John Doe is currently enrolled in Plan A and currently has six (6) Uncovered Months. Mr. Smith has just been determined to be LIS eligible effective September 1, 2010. Plan A submitted a Transaction 73 for Mr. Doe to CMS using an "R" for the Creditable Coverage Flag field, set the Number of Uncovered Months field equal to Zero (000) and set the Effective Date equal to 20100901. The Plan realizes they submitted a transaction for the wrong beneficiary (Mr. Doe is not LIS eligible, Mr. Smith is LIS eligible). The Plan must submit a Transaction 73 to CMS, set the Creditable Coverage Flag to "U", set the Number of Uncovered Months field to Zero (000) and the Effective Date to equal to 20100901. This will remove the end date from the NUNCMO record and the NUNCMO will apply continuously. Then submit the correct "R" for Mr. Smith to add the end date to his record (see question number 6 for how to do this).

Example 09b:

John Doe is currently enrolled in Plan A and currently has six (6) Uncovered Months. Mr. Doe has just been determined to be LIS eligible effective September 1, 2010. Plan A submitted a Transaction 73 to CMS using an "R" for the Creditable Coverage Flag field, set the Number of Uncovered Months field equal to Zero (000) and set the Effective Date equal to 20100701. The Plan realizes that the effective date was incorrect (Mr. Doe is not LIS eligible until September 1, 2010). The Plan must submit a Transaction 73 to CMS and set the Creditable Coverage Flag to "U", set the Number of Uncovered Months field to Zero (000) and the Effective Date to equal to 20100701. Once the "U" record has been successfully processed by MARx, the Plan must submit a new Transaction 73 to CMS and set the Creditable Coverage Flag to "R", set the Number of Uncovered Months field to Zero (000) and the Effective Date to equal to 20100901.

Q10: *Can I make other changes to a record beside Uncovered Months (such as premium withhold) when using a Transaction 73?*

A10:

No. Any data submitted with the Transaction 73 that is not pertaining to Uncovered Months will be ignored. The NUNCMO part of the transaction will process.

Q11: *How do I submit changes to Uncovered Months, for a beneficiary who is no longer enrolled in my plan? If I need to submit a RETRO batch file, which Contract number, PBP and effective date do I use for the transaction?*

A11:

You must submit a Transaction 73 through Retroactive batch processing. Use the contract number and PBP for when the member was in your plan. The Effective Date must be when the uncovered months were assessed and must match the effective date on the row on the NUNCMO table on the eligibility screen in CMS systems. Contact the MAPD Help Desk to have them open a Retro remedy ticket. CMS will contact you with additional instructions on submitting the RETRO transaction file. Refer to the other questions in this document to determine what specific values to include on the transaction.

Q12: *I received a TRC 215 (Uncovered Months change rejected, invalid effective date) on my Transaction 73 submission. How do I correct this?*

A12:

Make sure the effective date on your transaction matches an effective date of a row in the NUNCMO table listed on the eligibility screen in CMS systems, and that the other values on the transaction are correct; re-submit the transaction.

Q13: *The beneficiary who needs an NUNCMO change is currently enrolled in my plan. I need to change the NUNCMO value for a period where the beneficiary was*

not in my plan. When I submit my RETRO batch file, what Contract number and PBP and effective date do I use for the transaction?

A13:

Use the beneficiary's current (i.e. your own) Contract Number and PBP and set the Effective Date to when the uncovered months were assessed (equal to the date on the row on the NUNCMO table on the eligibility screen in CMS systems in which you are changing).

Example 13:

John Doe is enrolled in H1234 PBP 001 from January 1, 2008 to December 31, 2008. John Doe disenrolls from H1234 and is currently enrolled in H3456 PBP 002 since January 1, 2009. John Doe has 3 uncovered months that were not reported by H1234. The current plan (H3456) must submit a Transaction 73 to CMS using an "N" for the Creditable Coverage Flag field, set the Number of Uncovered Months field to equal three (003) and set the Effective Date equal to 20080101.

Q14: *How do I correct a number of uncovered months for a beneficiary who is currently enrolled in my plan but the uncovered month change is for a prior enrollment period in my plan? Do I transmit my transaction using a PROSPECTIVE or RETRO batch file?*

A14:

Since the beneficiary is currently enrolled in your plan, you should submit the request in a PROSPECTIVE file. Use the beneficiary's current Contract Number and PBP and set the Effective Date to when the uncovered months were assessed (equal to the date on the row on the NUNCMO table on the eligibility screen in the CMS systems in which you are changing). Please refer to the Feb 24, 2009 HPMS memo entitled "Instructions for submitting retroactive enrollment and disenrollment activity" for information about the RETRO process.

Example 14:

John Doe is enrolled in H1234 PBP 001 from January 1, 2008 to December 31, 2008. Mr. Doe disenrolls and enrolls in H3456 PBP 002 from January 1, 2009 to December 31, 2009. Mr. Doe disenrolls and re-enrolls back in H1234 PBP 002 from January 1, 2010 and is still currently enrolled. Mr. Doe has 3 uncovered months for the year 2007. The Plan must submit PROSPECTIVE file using a Transaction 73 (using H1234 PBP 001) to CMS using an "N" for the Creditable Coverage Flag field, set the Number of Uncovered Months field to equal three (003) and set the Effective Date equal to 20080101.

Q15: *My beneficiary is currently enrolled in my MA only PBP. He was previously enrolled in my MA/PD PBP. What Contract number and PBP and effective date do I use for my 73 transaction?*

A15:

Since an MA only plan can not submit a 73 transaction, submit the contract number, PBP and effective date of the MA/PD PBP plan.

Example 15:

John Doe is currently enrolled in H1234 PBP 001 (MA/PDP PBP) from January 1, 2010 to June 30, 2010. Mr. Doe disenrolls and enrolls in H1234 PBP 002 (MA only PBP) from July 1, 2010 to present. Mr. Doe has 3 uncovered months in 2009. The Plan must submit a Transaction 73 (using H1234 PBP 001) to CMS using an "N" for the Creditable Coverage Flag field, set the Number of Uncovered Months field to equal three (003) and set the Effective Date equal to 20100101.

Header Information

When preparing a MARx batch transaction file for submission to CMS, you must insure that the header date (payment Month field) for your file is the current processing month. To find the current processing month information, use the calendar in the PCUG at appendix C. (For header information, use the PCUG, appendix E,)

Example: Member is currently in your plan (PROSPECTIVE batch submission). Assume today is June 5, 2010. For this example

NUNCMO Effective date: 20100401

Header Date 072010 (Current header for Prospective Enrollments)

Retroactive Processing

Certain situations require retroactive processing to add, correct or reset NUNCMO information. When a plan is required to submit their request retroactively they will contact the MAPD Help Desk and open a ticket requesting permission to submit a RETRO file. The Help Desk will create a remedy ticket on your behalf. A CMS Division of Prospective Payment Representative will contact you with additional instructions.

When submitting a RETRO file (For ALL types of transactions, 51, 60, 61, 71, 72, 73, 74) to CMS plans must make the RETRO HEADER DATE the same as the effective date. For example, if the effective date is 01/01/2010 the header date as the RETRO file must be 01/2010; if the effective date is 02/01/2010 the header date must be 02/2008, etc.

Example: Member is no longer in your plan (retroactive batch submission)

NUNCMO effective date: 20100401

Header date 042010

Summary of MARx Transactions to Add, Change, or Remove the Number of Uncovered Months for an Enrolled Beneficiary

Action	Creditable Coverage Flag Value	Number of Uncovered Months Field Value	Effective Date on Transaction Code 73 (or a 60, 61, 62 or 71 as appropriate)
Submit an initial Number of Uncovered Months (KNOWN) to be greater than zero	N	Number greater than 0	Equal to existing enrollment effective date
Submit an initial Number of Uncovered Months (UNKNOWN or known to be Zero(000))	Y	0	Equal to existing enrollment effective date
Change an existing number of uncovered months due to plan error or reconsideration decision	N	Revised number greater than 0	Equal to existing NUNCMO effective date
	Y	0	Equal to existing NUNCMO effective date
Reset the existing number of uncovered months to 0 due to another IEP for Part D	R	0	Equal to the additional IEP effective date. **
Reset the existing number of uncovered months to 0 due to an individual becoming LIS eligible.	R	0	Equal to the effective date of LIS eligibility. **
Correct Erroneous Reset action already submitted	U	0	Equal to the effective date of the reset "R" transaction.

** Or the effective date must equal the effective date of the new Part D enrollment period.