

Fiscal Soundness Reporting Requirements (FSRR)
For Medicare Advantage (MA) Organizations
What You Need to Know

1. What is an active MA organization?
 - **An active MA organization is a new or renewing organization that has a contract with CMS and is currently serving Medicare Beneficiaries during 2008.**

2. When are the independently audited financial statements due to CMS?
 - **All renewing Medicare Advantage (MA) organizations in 2008 must provide CMS with their independently audited financial statements for year ending December 31, 2007 and 13 financial data elements (taken from the audited statements) through the Health Plan Management System (HPMS) no later than April 30, 2008. (Please refer to Q & A 4).**

3. Does my organization need to submit an independently audited financial statement if it has not previously contracted with CMS, or is new in 2008?
 - **Yes, new MA organizations in CY 2008 must provide through HPMS the following financial information no later than April 30, 2008:**
 - **If the new MA organization has six months or more of operations (i.e., Commercial, Medicaid) in the prior year, it must upload into HPMS a PDF of its 12/31/2007 independently audited financial statements and 13 financial data elements.**
 - **If the new MA organization has four to six months of operations, the applicant must upload into HPMS a PDF of its National Association of Insurance Commissioners (NAIC) Annual Health Blank and 13 financial data elements.**
 - **If the new MA organization has at least three months or fewer of operations, the applicant must upload into HPMS a PDF of its most recent Quarterly NAIC Health Blank and 13 financial data elements.**
 - **In addition to the above, if the organization is in financial distress at the time of the review, a financial plan may be requested of the applicant demonstrating how it would reach break-even.**

4. What are the 13 financial data elements that CMS is requiring MA organizations to submit?
 - **CMS is requiring the following 13 financial data elements for 2007:**

	<u>2007</u>
1. Net Worth	
2. Total Assets	

3. Cash & Short-Term Investments	
4. Long Term Liquid Investments (Bonds)	
5. Total Liabilities	
6. Health Claims Payable	
7. Total Revenue	
8. Total Expenses	
9. Total Medical and Hospital Expenses	
10. Total Administrative Expenses	
11. Net Income	
12. Cash Flow from Operations	
13. Total Member Months	

5. What is a National Association of Insurance Commissioners (NAIC) Health Blank?
 - **An NAIC health blank is a detailed financial report format required by the MA organization’s State Department of Insurance. Specifically, this format includes the organization’s balance sheet, income statement, statement of cash flow, premiums and investments schedules, claims information, etc. For further information regarding your State financial reporting obligations and frequency and timing of your filing requirements, please contact your State Department of Insurance.**

6. What is a Financial Plan and under what circumstances would my organization be required to file a financial plan?
 - **A financial plan is a 3 year projection of an organization’s financial statements (balance sheet, income statement, and statement cash flow) accompanied by descriptive and verifiable assumptions, and a projected date of break-even. Note: Break-even is defined as two successive quarters of net income. An organization could be asked by CMS to submit a financial plan for several reasons: (i) financial distress, (ii) two successive years of net loss, and/or (iii) a state administered corrective action plan as a result of fiscal soundness shortfalls.**

7. What is meant by descriptive and verifiable assumptions with respect to the financial plan?
 - **Descriptive: an analyst should be able to reach the same numbers using the assumptions alone. Verifiable: there is source data available to support the numbers used to develop the projections.**

8. To whom do I send my independently audited financial statements?
- **All independently audited financial statements must be submitted in a PDF file or zip file to the financial reporting module within HPMS. Further, CMS is requesting the input of 13 financial data elements within HPMS (see Q and A 4 above).**
9. What do the acronyms GAAP and SAP stand for and which should be submitted to CMS?
- **GAAP stands for Generally Accepted Accounting Principles. SAP stands for Statutory Accounting Principles. All renewing MA organizations in 2008 should submit their independently audited financial statements in the SAP format.**
10. Where do I obtain the SAP instructions and related information?
- **Instructions for preparing SAP financial statements can be found several ways. The most efficient way would be to contact your company's state of domicile Insurance Department. Another source of information would be to directly contact the National Association of Insurance Commissioners (NAIC) or access the NAIC website, www.naic.org. This site can be used to address a number of insurance accounting issues.**
11. The figures used in our independently audited financial statements are rounded to the nearest thousand. Should I use this same rounding when I electronically transmit the 13 financial data elements to HPMS?
- **No, MA organizations should not round. When you transmit the audited figures that are rounded to the nearest thousand in the financial statements, please add three 000s to the end of the rounded figures.**
12. How do I contact CMS if I have questions about my independently audited financial statements?
- **You may contact CMS by email at: FinancialReview@cms.hhs.gov**
13. Can I send my independently audited financial statements to CMS in a PDF file by email?
- **No. For 2007 reporting, CMS is requiring independently audited financial statements be submitted electronically to the financial module within HPMS. You must submit your independently audited financial statements in a PDF file. Moreover, the PDF file must include all pages including any associated letters, opinions, the signature page, etc.**

14. As a renewing MA organization, should I stop sending the quarterly financial statements?
- **Yes. CMS does not accept paper reporting. However during the course of a fiscal soundness review, CMS may request your organization submit electronically other relevant financial information which could include quarterly reports.**
15. Will any of my organization's financial information be made publicly available by CMS?
- **As a rule, CMS does not publish or share proprietary information (except for financial data which is publicly available).**
16. My MAO is part of a larger organization and does not have a separate audit of its financial records. How do I comply with the requirements?
- **If the contract is between your organization and CMS and the larger organization is the guarantor, then the larger organization's independently audited financial statements would be sufficient. However, if the larger organization is not the guarantor and the contract is with the smaller organization, then the smaller organization would need to produce the audited information.**
17. Does each H number require a separate reporting?
- **Each contract must provide a separate report unless it is part of a consolidated report or part of a larger organization.**
18. Is it necessary to include my organization's "H" or "R" number on the independently audited financial statements?
- **Yes for each contract even if a consolidated report, you must include your organizations "H" and "R" numbers ("H" numbers are Medicare Advantage contract numbers assigned to HMOs, PFFS plans, Cost plans, PACE organizations, and PPOs. "R" numbers are Medicare Advantage contract numbers assigned specifically to Regional PPOs) on the cover sheet of the independently audited financial statements and any correspondence sent to CMS. If the audit report represents a consolidation of several contracts, please indicate on the cover of the report the various H or R numbers included within the report. CMS cannot process financial reports that do not have an H or R number associated with them.**
19. How does CMS determine fiscal soundness?

- **The fiscal soundness of an organization is determined by examining several financial measures. Specifically, the organization must 1) maintain a positive net income, 2) ensure there is adequate cash flow and liquidity to meet obligations as they come due, and 3) maintain a net worth that meets the minimum reserve of its respective State.**
20. Can I still submit a hard copy version of the independently audited financial statements or any other financial information?

- **No, CMS requires a PDF file be uploaded to HPMS.**

21. Whom should I contact if I have questions?

- **You may contact the financial management specialist assigned to your State or Territory and CMS region as follows:**

<p>Franklin.Regulski@cms.hhs.gov or at 410-786-6278</p>	<p>CMS Region: I. Boston II. New York III. Philadelphia VII. Kansas City</p>	<p>States and Territories: CT,DE,MA,MD,ME,NH,NJ, NY,PA, PR, RI,VA,VT,WV,IA,KS MO,NE, DC</p>
<p>Joseph.Esposito@cms.hhs.gov or at 410-786-1129</p>	<p>IV. Atlanta V. Chicago VI. Dallas</p>	<p>AL,AR,FL,GA, IL,IN,KY,LA,MI, MS,MN,NC,NM,OH,OK,SC, TN,TX,WI</p>
<p>Yasmin.Galvez@cms.hhs.gov or at 410-786-0434</p>	<p>VIII. Denver IX. San Francisco X. Seattle</p>	<p>AK,AZ,CA,CO,HI,ID,MT, ND,NV,OR,SD,UT,WA,WY</p>

22. What if I am unable to submit the independently audited financial statements to CMS by April 30th?

- **If you believe you will be unable to submit the independently audited financial statement by April 30th, you must contact your financial management specialist prior to the April 30th due date.**

23. Is there an electronic financial reporting mailbox?

- **As stated above, the electronic filing of reports shall be achieved through a fiscal soundness module within HPMS. All e-mail inquiries and correspondence should come to the CMS e-mail box at: Financialreview@cms.hhs.gov .**

24. What should I do if I have financial concerns or issues with my State regarding inadequate State reserves, corrective action plan, or special monitoring by the State regulator?
- **The MA organization must contact its State(s) and CMS immediately.**
25. When will the fiscal soundness module in HPMS be released?
- **The fiscal soundness module in HPMS is scheduled to be released at the end March 2008.**
26. Why does an MA organization need to enter the 13 financial data elements in addition to submitting the required financial information?
- **The 13 financial data elements allow CMS to more thoroughly evaluate the organization's fiscal soundness in a timely manner.**
27. Why is CMS asking for the financial information of a new MA organization?
- **CMS is asking for the financial information for a new MA organization because the developmental phase of a new organization is a very critical time with respect to liquidity, stability and overall fiscal soundness. Given these circumstances, having access to the financial information early will help CMS ensure the fiscal soundness of the organization.**