



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

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

DATE: July 31, 2024

SUBJECT: Contract Year (CY) 2025 Final Actuarial Certification Deadline

As part of the CY2025 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 were required to complete the initial certification process in June and are now required to complete the final certification process, as discussed in Appendix A of the CY2025 BPT instructions. The actuarial certification module is now available and all final certifications must be completed by **Tuesday August 13, 2024 (11:59 p.m. PDT)**.

If no resubmission occurred during the bid review process, such that the HPMS upload version number of the plan is currently the same version number as originally certified in June, then the original certification will be considered the final certification and no additional certification is required at this time. However, if a resubmission occurred during the bid review process, for either Plan Benefit Package (PBP) or BPT issues, then a final certification must be submitted by the deadline. Even if no BPT changes occurred during those resubmissions, a final certification is still required since the HPMS upload version number has changed. The HPMS version number is displayed in the certification module for each bid.

Note that if a final 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.

If a bid is not being resubmitted for rebate reallocation (e.g., PDPs) and is not being resubmitted for any other outstanding bid review issues, then the final actuarial certification should be completed as soon as possible, but not later than the deadline specified above. For bids that will be resubmitted during the rebate reallocation period, the certifying actuary should wait until the rebate reallocation resubmission occurs and is processed by HPMS before submitting the final actuarial certification.

For all bids, we require actuaries to review the information uploaded to HPMS pertaining to the bids that they will certify to ensure there are **no outstanding issues** before submitting the final actuarial certification. CMS relies on the final actuarial certification that the bid development is reasonable for the filed PBP and does not allow changes to the BPT after the final actuarial certification is submitted. Any inconsistencies within the BPT, or between the BPT and the PBP, discovered while preparing the final certification should be discussed with the plan sponsor before they are brought to the attention of CMS. Should any changes seem warranted, please contact the Office of the Actuary at BidReviewC@cms.hhs.gov as soon as possible.

No material changes to the previously submitted certification language will be considered unless directly requested by CMS. If changes were requested by CMS, these issues must be addressed. These guidelines must be followed in order for the bid to receive consideration for approval by CMS.

The actuary who certified the original bid in HPMS should be the same individual who submits the final certification. However, if for some reason this actuary is not available (i.e. no longer at the company, etc.) another qualified actuary may certify the bid as long as no additional qualifying text is appended to the certification.

For additional information on the CY2025 certification requirements and process, please refer to the following resources:

- Memorandum released via HPMS, dated May 29, 2024, regarding the initial certification process and deadline, which included technical instructions for the actuarial certification module.
- Appendix A of the *Instructions for Completing the Medicare Advantage or Prescription Drug Plan Bid Pricing Tools for Contract Year 2025*.

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