The Reopening Opportunity

The CMS allows for Plan Sponsors to "go back" and review filings for additional subsidy and compliance issues up to four years after the original final reconciliation. This means that Plan Sponsors can appeal to reopen up to four previously reconciled plan years, provided they meet the requirements for reconsideration. The reopening process requires the Plan Sponsor to repeat the entire 12-step Final Reconciliation process in order to ensure full compliance with program requirements as well as ensure they received the maximum subsidy payment to which they were entitled.

Reopenings provide a valuable, though challenging opportunity for Plan Sponsors to find additional subsidy dollars, which is why they hire PDA. We are the best-in-class vendor out there and were among the first to assist Plan Sponsors in reopening their RDS applications. Just like with traditional RDS application filings, PDA handles virtually every aspect of the reopening process for our clients and averages 8%-15% in additional subsidy findings. We do the heavy lifting so you don't have to.

Typical Reopening Timeframe

	Reopening Step	Part D Advisors	Plan Sponsor	Data Provider	CMS	Timeline
1	Documentation and Data Gathering	✓✓✓	✓	✓		1 - 3 Months
2	Review Data	✓✓✓				1 - 3 Months
3	Generate New Cost Report	✓✓✓				1 - 2 Weeks
4	**Submit Appeal Request**	✓✓				**1 - 2 Weeks**
5	Wait for Appeal Approval / Continue Data Review	✓✓✓			✓	1 - 2 Months
6	Complete the Reopening	✓✓✓				3 Months
7	Resubmit Final Reconciliation	✓✓✓	✓			1 - 2 Weeks
8	Submit Payment Justification	✓✓				1 - 2 Weeks
9	Wait for Payment	✓			✓	2 - 4 Weeks
	Total	✓✓✓	✓	✓	✓	**7 -13 Months**

*All timeframes are estimates based on PDA's years of experience with the reopening application process. Steps that require an outside vendor's participation (1, 5, and 9) are projections based on typical experience, but cannot be controlled by PDA

✓ Minimal Work (gather documents, phone calls, etc)

✓✓ Medium Work (data review, information processing, conference calls, etc.)

✓✓✓ Heavy Work (claims processing, detailed review, reporting, supplying RDS requirements, etc)