



## Commercial Repayment Center Portal (CRCP) Defense Submission Frequently Asked Questions

Recently a change was made to the portal that allows CRCP users to associate defenses to the individual claims included in recovery demands. This more granular response to demands, where Group Health Plans (GHPs) specify the basis of defense submissions, allows for more efficient and accurate reviews of the submitted defenses. What follows are answers to frequently asked questions received by the Commercial Repayment Center (CRC) in regard to this change. Additional details on the functionality are available in Version 3.2 of the CRCP User Guide, which is available in the “Reference Materials” section of the CRCP.

**Question 1:** When can a defense be submitted through the CRCP?

**Answer 1:** You may submit a defense for claims associated with the case as long as the following criteria are met:

- The demand letter date is within the last 180 days,
- The case has not been referred to Treasury, and
- The account receivables balance is greater than zero.

Where these criteria are not met, defenses may still be submitted through the traditional process.

**Question 2:** Does each claim line in the CRCP need to be dispositioned individually?

**Answer 2:** Multiple claim lines can be selected for the same defense type, but all claims selected at one time must have the same defense type for a defense submission. If a large portion of the claims will receive the same type of defense, users may select all at the top of the list and deselect those claims for which that defense would not apply.

A user can submit multiple defenses for a case and select claims with a different defense type in subsequent submissions. For example, if some claims fall under the “Coverage” defense type and some fall under the “ESRD” Defense, there will be two separate defense submission (one for each defense type). The same documentation file may be submitted, but it should clearly delineate which evidence is applicable to which defense type.

**Question 3:** When uploading supporting documentation, should it only include the required documentation for the specific claims and defense type? Can one package be submitted with information included for all claims for each defense type?

**Answer 3:** For accuracy and improved timeliness of processing defenses, it is recommended that supporting documentation be specific to the individual defense types and claims included in that defense. Debtors may upload the same, consolidated documentation package for each defense type asserted, but must also clearly indicate which documentation is intended to support which defense type.

**Question 4:** Can a defense be submitted on the CRCP if a Case Closed letter has been received?

**Answer 4:** Once a case is closed on the CRCP and a case closed letter has been sent, a defense cannot be submitted via the portal. However, defense documentation can still be submitted for that case to the CRC via fax or mail.

**Question 5:** If a defense is submitted and the user mistakenly did not include a particular claim(s), can that claim(s) be added to the submitted defense in the CRCP?

**Answer 5:** Once a defense has been submitted it cannot be edited by the user in the CRCP. However, the user can select any missed claim lines and create a separate defense submission with the same defense documentation (if inclusive of the missed claims).

**Question 6:** Previously, when submitting a defense via fax or mail, a cover sheet was required. Is that cover sheet still necessary when submitting a defense via the portal?

**Answer 6:** When submitting a defense through the portal, the “GHP Correspondence Cover Sheet” (included with demand letters and available on CMS.gov) is not required. However, this cover sheet should not be confused with the explanatory cover letter (on corporate letterhead) that is still required for all defense submissions regardless of how they are submitted. Additional details on the cover letter requirements can be found within the CRCP and in the *Group Health Plan Defense Reference Guide* located on the [Group Health Plan Recovery](#) page on CMS.gov.

**Question 7:** If a CRCP user plans to repay Medicare and issue payment to the CRC, should the user submit anything in the CRCP for those applicable claims?

**Answer 7:** The CRCP Defense submission process is intended for defenses only where the debtor believes they are not responsible for repayment of the debt, not notification of payment or intent to pay. If you intend to make payment, you should issue payment to the CRC along with the information necessary to identify the case to ensure the accurate application of the payment to the debt.

**Note:** Electronic payments may be made in the CRCP via the Make a Payment page. Or, to set up an ACH electronic process, please send an inquiry to the CRC Outreach mailbox at [rcoutreachteam@performantcorp.com](mailto:rcoutreachteam@performantcorp.com).

**Question 8:** Who should be contacted if there is a question about a case or defense status in the CRCP?

**Answer 8:** For case-specific issues of any kind please contact the CRC at 1-855-798-2627 (TTY/TDD: 1-855-797-2627 for the hearing and speech impaired).

**Question 9:** Who should be contacted if there are technical issues in the CRCP while trying to submit a defense?

**Answer 9:** For technical issues with the portal please contact the Benefits Coordination & Recovery Center (BCRC) EDI Department at (646) 458-6740. Or contact them by email at [COBVA@ehmedicare.com](mailto:COBVA@ehmedicare.com).