

Debit Card Substantiation

- * The true benefit of the debit card is that the member will not have to pay out-of-pocket; however, the card is not a paperless product. The member may have to submit documentation if requested by UMR.
- * UMR uses all IRS endorsed methods of auto-substantiation, as follows:
 - o IIAS (Inventory Information Approval System): Transactions that occur at IIAS compliant merchants are automatically substantiated at the point-of-sale. No further follow-up is required; however, the member is required by the IRS to retain all debit card receipts.
 - o Pharmacies referred to as "90% pharmacies" have not implemented the IIAS process.
 - * These pharmacies certify each year that 90% of their gross revenue comes from flexible spending eligible items.
 - * Documentation for transactions that occur at 90% pharmacies may be requested since an IIAS is not in place to automatically substantiate the transaction.
 - o Copay logic.
 - o Recurring expense logic.
 - * Transactions from the date the recurring expense information is provided and documented and going forward will be automatically substantiated. Prior to that date, transactions will need to be substantiated.
 - * This logic will remain in place for 12 months. At that point, new documentation will be required.
 - o Data file feeds: File feed information must match the debit card transaction exactly. If it doesn't match, substantiation is required.

Member Documentation Request Process

- * Debit card transactions not auto-substantiated through any of the current automated processes will result in the member receiving substantiation request notifications.
 - o The first notification is sent after the transaction completes the automated processes and still cannot be substantiated.
 - o If documentation has not been received and processed within 27 days of the first notification, a second request notification is sent to the member.
 - o If documentation has not been received and processed within 27 days of the second notification, a third request notification is sent to the member advising that their debit card account access has been suspended until one of the below is completed:
 - * Submits appropriate documentation,
 - * Makes the repayment,
 - * Submits a paper claim to offset the overpayment amount, or
 - * Has the merchant do a purchase return to credit the debit card
 - o If at any time during the above letter process, documentation is received and the transaction is deemed ineligible, an ineligible letter would be sent to the member. If no action is taken, the account will be suspended 28 days from the date of this letter (other ineligible card transactions could impact the card deactivation timing).
- * Until transactions have been resolved, debit card access to the account remains in a suspended status.