

Enrollment Reconciliation & IC834 Workgroup



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IC834 – Housekeeping

- **The PO-IC834 reporting suite** (PO Summary, PO Detailed, and Reinstatement Detailed) for transactions submitted 6/4 – 6/10 are in the process of being sent out
 - The PO and Reinstatement Detailed reports were sent out yesterday, Wednesday, June 12
 - The PO Summary Reports were sent out today, Thursday, June 13
 - If you have any questions about specific IC834 transactions submitted or report delivery, please contact Inbound834@bah.com

IC834 – Housekeeping (cont.)

- **Reminder: Unprocessed Transactions Outreach**
 - An issue was recently identified in which a subset of submitted transactions were not able to process at the FFM.
 - This was due to an internal processing issue at the FFM and reflects no fault of issuers. The FFM has already implemented a fix for the issue.
 - Outreach was sent to affected issuers on Monday, June 3. If your organization did not receive an email on Monday, you are not affected.
 - For those affected:
 - Please resubmit the files identified in the email
 - The only two things that need to change on the resubmitted file are: control numbers & file name

IC834 – PY2018 Deadline (Reminder)

- Issuers are strongly encouraged to send all outstanding enrollment updates for Plan Year 2018 to the FFM
- The Inbound FFM Individual Market **will accept IC834 submissions for 2018 policies until Monday, August 12, 2019 at 11:59PM EST**
- Starting August 13, 2019, Issuers will receive rejected BAAs for “Year Out of Range” in response to IC834 transactions for 2018 policies
- Should an Issuer need to apply corrections for 2018 policies after August 12, 2019, trading partners may leverage the Enrollment Resolution and Reconciliation (ER&R) process
- Please note this deadline does not impact IC834 transactions for 2019 enrollments

IC834 – Top Submission Errors & How to Correct

- The top submission errors the IC834 Team observes are:
 - E095 (out of sequence)
 - E051 (Eligibility Begin Date and Eligibility End Date)
- As a reminder:
 - For Issuers receiving E095 errors for 2019 terminations, CMS encourages review of monthly pre-audit files to determine the latest policy status at FFM to verify that the update is eligible through IC834 prior to submission

IC834 – Date Processing Errors

- Dates within IC834 files must be formatted in accordance with the type of transaction intended

		Date Considerations	X12 Code
Expected Transaction Outcome	Effectuation	Eligibility Begin Date (IC834) and Benefit Begin Date (IC834) = Benefit Begin Date (FFM Policy)	2000 DTP*356 (IC834) and 2300 DTP*348 (IC834) = 2300 DTP*348 (FFM Policy)
	Cancellation	Eligibility End Date (IC834) = Eligibility Begin Date (FFM Policy)	2000 DTP*357 (IC834) = 2000 DTP*356 (FFM Policy)
		Eligibility End Date (IC834) = Eligibility Begin Date (FFM Policy) – 1 day	2000 DTP*357 (IC834) = 2000 DTP*356 – 1 (FFM Policy)
	Termination	Eligibility End Date (IC834) > Eligibility Begin Date (FFM Policy) AND Eligibility End Date (IC834) <= Eligibility End Date (FFM Policy)	2000 DTP*357 (IC834) > 2000 DTP*356 (FFM Policy) AND 2000 DTP*357 (IC834) <= 2000 DTP*357 (FFM Policy)

Housekeeping: Pre-Audit & Reconciliation

- **Prior Plan Years (2014-2018)**
 - A set of 1095-A Consumer-Initiated Dispute Update (1095Ax) Files were delivered to Issuers yesterday, Wednesday, June 12th
 - The next set of 1095-A Consumer-Initiated Dispute Update (1095Ax) Files is scheduled for distribution on Wednesday, June 26th
- **Plan Year 2014**
 - Comprehensive 2014 Enrollment Pre-Audit (OTPAUD) Files are now scheduled for delivery to Issuers on Thursday, June 20th
- **Plan Year 2016**
 - This month's 2016 FFM extract is scheduled for Saturday, June 15th at 6PM EDT
 - Comprehensive 2016 Enrollment Pre-Audit (AUD16) Files based upon that extract are scheduled for delivery to Issuers on Thursday, June 20th
 - The RCNI16 submission deadline for the June 2016 Off-Cycle Run is Monday, June 24th at 3PM EDT
 - **Issuers are now able to submit RCNI16 Files for the off-cycle run and receive the results of file-level validation**
 - **As a reminder these files contain production data and must be submitted to the Production environment, as signified by the .P in the filename**
 - **Appendix: 2016 Off-Cycle Reconciliation Process**

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2017**

- This month's 2017 FFM extract is scheduled for Saturday, June 15th at 6PM EDT
- Incremental Pre-Audit (ISIPA7) Files based upon that extract are scheduled for delivery to Issuers on Wednesday, June 19th

- **Plan Year 2018**

- This month's 2018 FFM extract is scheduled for Saturday, June 15th at 6PM EDT
- Comprehensive Enrollment Pre-Audit (AUD8) Files based upon that extract are scheduled for delivery to Issuers on Tuesday, June 18th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2019**
 - This month's 2019 FFM extract is scheduled for Saturday, June 15th at 6PM EDT
 - Comprehensive Enrollment Pre-Audit (AUD9) Files based upon that extract are scheduled for delivery to Issuers on Tuesday, June 18th
 - Date of Birth Cleanup (MISC9) Files will also be distributed to impacted Issuers on Tuesday, June 18th
 - The RCNI9 submission deadline for June's Run 7 is Thursday, June 20th at 3PM EDT

Timing of Changes to RCNI and RCNO

- Changes to the Reconciliation Files to align with v5.1 will go into effect in the August 2019 off-cycle and subsequent production run
 - RCNI9 Files due to CMS by Thursday, August 1st for the off-cycle must be submitted with the new Cancellation Reason and Termination Reason fields in the 01 Record
 - Population of these new fields will not be required initially, but the fields must be accounted for at minimum with two additional pipe delimiters
- CMS plans to require population of Cancellation and Termination Reason Codes for policies that are submitted as cancelled or terminated starting in November's Run 12
 - Starting in November, if Issuers do not populate these Reason Codes (or populate them improperly), this may result in suppression of cancellations and terminations through automated reconciliation
 - Initially CMS will be analyzing the reason code data submitted by Issuers but will not be updating the actual codes on the FFM
 - Once v5.1 is in effect in August, Issuers are encouraged to provide the Reason Codes as soon as possible so CMS can initiate analysis of data quality and assist in resolving any implementation issues
 - Additional information regarding population of Reason Codes on the RCNI File was covered in detail on the June 6th webinar; the presentation is available at:
<https://zone.cms.gov//document/enrollment-reconciliation-and-ic834-workgroup-call-content>

Enrollment Dispute Form v12: Introduction

- ER&R is announcing the upcoming implementation of the new Enrollment Dispute Form v12 in September or October 2019.
 - ER&R will provide issuers with an exact implementation date as far in advance as possible.
 - A prototype of the Enrollment Dispute Form v12 will be available for download on zONE at <https://zone.cms.gov/document/enrollment-data-reconciliation>.
 - Issuers may also contact the ER&R Support Center at **1 (855) 591-7113** or ERRSupportCenter@Cognosante.com to obtain the file.
- When v12 is implemented, v11 will no longer be accepted. Issuers should begin making any necessary changes on their end to support the use of v12.
- The Excel add-ins for Enrollment Dispute Form v11 are not compatible with v12.
 - Complete v12-compatible add-ins will be released prior to implementation.
 - Once implementation of v12 is complete, issuers should discontinue using the v11 add-ins, which will be retired.

NOTE: The prototype of the Enrollment Dispute Form v12 is for testing and review purposes only. ER&R will return any disputes submitted using this form.

Enrollment Dispute Form v12: Improvements

- Improvements to the new version of the form include:
 - Addition of Date of Birth Discrepancy Dispute type
 - Addition of Segment ID column, to be used for prior year disputes
 - Addition of FFM Exchange Assigned Member ID column for the following member-level Discrepancy Dispute types:
 - » Gender
 - » Tobacco Status
 - » All issuer-assigned IDs
 - » Date of Birth
 - Elimination of End of Year – Termination Indicator and Paid Through Date dispute types
 - Elimination of Batch Number column
 - Elimination of FFM Benefit Start Date and FFM Benefit End Date columns
 - NOTE:** With the addition of the Segment ID column, it is no longer necessary for issuers to provide this information.
 - Reordering of columns for enhanced consistency between tabs
 - Insertion of new pipe-delimited file formats
 - » Formats now include version number and tab name
 - » Field order now mirrors Excel format
 - Formatting changes for 508 compliance

Enrollment Dispute Form v12: Walkthrough

- Discrepancy Dispute tab changes:
 - Removed Batch Number column
 - Added Segment ID column
 - Added FFM Exchange Assigned Member ID column

Discrepancy Dispute

Point of Contact Name		Use the Discrepancy Dispute tab when the FFM values from the RCNO do not match the issuer's records. A Discrepancy Dispute can be submitted for a policy relating to the subscriber. Changes apply to the entire enrollment group.
Telephone Number		
Email Address		NOTE: The Description of Disputed Item field (column I) must contain a value selected from the drop-down menu. Custom entries will not be accepted.
Contact the ER&R Support Center for assistance using this form: 1-855-591-7113 or ERRSupportCenter@cognosante.com		
Additional information is available on zONE: https://zone.cms.gov/document/enrollment-resolution-and-reconciliation		

Required	Required	Required for prior year disputes if Segment ID is not provided in column F	Required for prior year disputes if FFM Internal Record Inventory Number is not provided in column D	Required for prior year disputes if FFM Internal Record Inventory Number is not provided in column D	Required	Required for prior year disputes when using Segment ID for Date of Birth, Gender, Tobacco Status, and all Issuer Assigned ID dispute types	Required	Required	Required	Required for Applied APTC Amount, QHP ID, and Total Premium Amount* disputes	Optional	Optional
		Required for current year disputes	Optional for current year disputes	Optional for current year disputes		Optional for current year disputes				*See Dispute Examples tab for information on Total Premium Amount disputes that do not require HICS cases		
HIOS	Coverage Year	FFM Internal Record Inventory Number	FFM Exchange Assigned Policy ID	Segment ID	FFM Exchange Assigned Subscriber Identifier	FFM Exchange Assigned Member ID	Description of Disputed Item	Issuer Value	FFM Value	HICS Case ID	Issuer Assigned Dispute Control Number	Comments

- Issuers may populate the FFM Internal Record Inventory Number field instead of the Segment ID field for prior year disputes.
- The member ID is required for the following member-level dispute types for prior year disputes, even when disputing the subscriber's information:
 - Date of Birth
 - Gender
 - Tobacco Status
 - Issuer-assigned IDs

Enrollment Dispute Form v12: Walkthrough

- Rejected Enrollments tab changes:
 - Removed Batch Number column
 - Updated information section
 - Other general improvements

Rejected Enrollments

Point of Contact Name		Use the Rejected Enrollments tab to report member records that should be cancelled. Rejected Enrollments can be policies that should not have passively reenrolled, duplicate policies, "leftover" policies, or policies for which there was not coverage for that time period. Rejected Enrollments can only be submitted for policies during the current RCNO year. For prior year cancellations, use the Initial Premium Paid Status dispute type on the Discrepancy Dispute tab.			
Telephone Number					
Email Address					
Contact the ER&R Support Center for assistance using this form: 1-855-591-7113 or ERRSupportCenter@cognosante.com		NOTE: Using this form will cancel the entire policy. To cancel an individual coverage span, use the Initial Premium Paid Status dispute type on the Discrepancy Dispute tab and submit the Issuer Value of "C". Additional information is available on zONE: https://zone.cms.gov/document/enrollment-resolution-and-reconciliation			
Required	Required	Required if FFM Exchange Assigned Policy ID is not provided in column E	Required if FFM Internal Record Inventory Number is not provided in column D	Required	Optional
HIOS	Coverage Year	FFM Internal Record Inventory Number	FFM Exchange Assigned Policy ID	FFM Exchange Assigned Subscriber Identifier	Issuer Assigned Dispute Control Number

- The Segment ID column was not added to the Rejected Enrollments tab.

Enrollment Dispute Form v12: Walkthrough

- Reinstatement End Date 12.31 tab changes:
 - Removed Batch Number column
 - Removed FFM Benefit Start Date and FFM Benefit End Date columns
 - Added Segment ID column

Reinstatement End Date 12.31

Point of Contact Name	Use the Reinstatement End Date 12.31 tab to report member records that the issuer would like to reinstate to reflect the FFM Benefit End Date as December 31. Reinstatements can be submitted for any coverage year. If a policy needs to be reinstated to a date other than December 31, use the applicable option on the Discrepancy Dispute tab; to change the FFM end date on a prior coverage year policy, use <i>Prior Year – End Date</i> , and for current coverage year policies, use <i>Issuer End Date Later Than FFM</i> to change the end date to a later date or <i>Issuer End Date Earlier Than FFM</i> to change the end date to an earlier date.					
Telephone Number						
Email Address						
Contact the ER&R Support Center for assistance using this form: 1-855-591-7113 or ERRSupportCenter@cognosante.com		NOTE: By submitting a policy as a Reinstatement End Date 12.31, the issuer is indicating that the EOY Termination Indicator should be "N" or blank. Additional information is available on zONE: https://zone.cms.gov/document/enrollment-resolution-and-reconciliation				
Required	Required	Required for prior year disputes if Segment ID is not provided in column F	Required for prior year disputes if FFM Internal Record Inventory Number is not provided in column D	Required for prior year disputes if FFM Internal Record Inventory Number is not provided in column D	Required	Optional
		Required for current year disputes	Optional for current year disputes	Optional for current year disputes		
HIOS	Coverage Year	FFM Internal Record Inventory Number	FFM Exchange Assigned Policy ID	Segment ID	FFM Exchange Assigned Subscriber Identifier	Issuer Assigned Dispute Control Number

- Issuers may populate the FFM Internal Record Inventory Number field instead of the Segment ID field for prior year disputes.

Enrollment Dispute Form v12: Walkthrough

- Newborn Premium Updates tab changes:
 - Removed Batch Number column
 - Removed FFM Benefit Start Date and FFM Benefit End Date columns
 - Added Segment ID column

Newborn Premium Updates

Point of Contact Name	Use the Newborn Premium Updates tab to report newborn member records that qualify for a free premium coverage period in accordance with state laws. Newborn Premium Updates are policies that currently reflect an individual premium amount for a period of time, when the state law indicates the newborn should not have a premium rate for the first month or two.								
Telephone Number									
Email Address	NOTE: Issuers may not submit Newborn Premium Updates for newborns who have not gone through the FFE eligibility determination and already have coverage through the FFE under the subscriber's policy.								
Contact the ER&R Support Center for assistance using this form: 1-855-591-7113 or ERRSupportCenter@cognosante.com		Additional information is available on zONE: https://zone.cms.gov/document/enrollment-resolution-and-reconciliation							
Required	Required	Required for prior year disputes if Segment ID is not provided in column F	Required	Required for prior year disputes if FFM Internal Record Inventory Number is not provided in column D	Required	Required	Required (must be greater than zero)	Required	Optional
		Required for current year disputes		Optional for current year disputes					
HIOS	Coverage Year	FFM Internal Record Inventory Number	FFM Exchange Assigned Policy ID	Segment ID	FFM Exchange Assigned Subscriber Identifier	Date to Begin Charging Newborn Premium	Subscriber Total Premium during Free Coverage Period	Subscriber APTC During Free Coverage Period	Issuer Assigned Dispute Control Number

- Issuers may populate the FFM Internal Record Inventory Number field instead of the Segment ID field for prior year disputes.

Enrollment Dispute Form v12: Walkthrough

- Enrollment Blocker tab changes:
 - Removed Batch Number column

Enrollment Blocker

Point of Contact Name	Use the Enrollment Blocker tab to submit disputes related to Enrollment Blocker HICS cases. ER&R is able to update financial information, remove members, and adjust coverage periods. A consumer-initiated HICS case is required for ER&R to process the dispute. Issuers may submit open HICS cases using the HICS Direct Dispute process. If the HICS case is closed, the issuer may only submit the dispute using this form.										
Telephone Number	ER&R will use the information in the dispute form fields, including the Comments field, and the information in the associated HICS case to resolve the dispute.										
Email Address	NOTE: ER&R does not have the ability to add consumer information into the FFE. Only the dates and financial amounts can be updated to align with issuer data for the current coverage year. Additional information is available on zONE: https://zone.cms.gov/document/enrollment-resolution-and-reconciliation										
Contact the ER&R Support Center for assistance using this form: 1-855-591-7113 or ERRSupportCenter@cognosante.com											
Required	Required	Required	Required	Optional	Optional	Optional	Optional	Optional	Required	Optional	Optional
HIOS	Coverage Year	FFM Exchange Assigned Policy ID	FFM Exchange Assigned Subscriber Identifier	Total Premium to be Applied	APTC Amount	QHP Variant ID	CSR	Issuer Start Date as a result of Add or Removal of Member(s)	HICS Case ID	Issuer Assigned Dispute Control Number	Comments

- The Segment ID column was not added to the Enrollment Blocker tab.
- FFM Exchange Assigned Policy ID and FFM Exchange Assigned Subscriber Identifier are required for current year and prior year disputes.

Enrollment Dispute Form v12: Walkthrough

- Mailing Address Change tab changes:
 - Added Segment ID column

Mailing Address Change

Point of Contact Name		Use the Mailing Address Change tab to submit address changes. Issuers should ensure they are submitting valid addresses. Mailing Address Changes can be submitted for current and prior year RCNO records. For current year address changes, the issuer must submit the same address in RCNI that is being requested using this form.										
Telephone Number												
Email Address												
Contact the ER&R Support Center for assistance using this form: 1-855-591-7113 or ERRSupportCenter@cognosante.com		Additional information is available on zONE: https://zone.cms.gov/document/enrollment-resolution-and-reconciliation										
Required	Required	Required for prior year disputes if Segment ID is not provided in column F	Required	Required for prior year disputes if FFM Internal Record Inventory Number is not provided in column D	Required	Required	Optional	Required	Required	Required	Optional	Optional
		Required for current year disputes		Optional for current year disputes								
HIOS	Coverage Year	FFM Internal Record Inventory Number	FFM Exchange Assigned Policy ID	Segment ID	FFM Exchange Assigned Subscriber Identifier	Issuer Mailing Address Line 1	Issuer Mailing Address Line 2	Issuer Mailing Address City	Issuer Mailing Address State	Issuer Mailing Address ZIP Code	Issuer Assigned Dispute Control Number	Comments

- Issuers may populate the FFM Internal Record Inventory Number field instead of the Segment ID field for prior year disputes.

Enrollment Dispute Form v12: Walkthrough

- Agent Broker Information tab changes:
 - Added Segment ID column

Agent Broker Information

Point of Contact Name	Use the Agent Broker Information tab to remove or update the Agent Broker information associated to an exchange-assigned policy. Issuers should ensure they are submitting valid information. Updates will be made at the policy level for all active coverage spans. Agent Broker changes can be submitted for current and prior year RCNO records. For current year changes, the issuer must submit the same Agent Broker information in RCNI that is being requested using this form.												
Telephone Number													
Email Address													
Contact the ER&R Support Center for assistance using this form: 1-855-591-7113 or ERRSupportCenter@cognosante.com		Additional information is available on zONE: https://zone.cms.gov/document/enrollment-resolution-and-reconciliation											
Required	Required	Required	Required for prior year disputes if Segment ID is not provided in column G	Required	Required for prior year disputes if FFM Internal Record Inventory Number is not provided in column E	Required	Required for Update disputes	Optional for Update disputes	Required for Update disputes	Optional for Update disputes	Required for Update disputes	Optional	Optional
			Required for current year disputes		Optional for current year disputes		Must be left blank for Remove disputes	Must be left blank for Remove disputes	Must be left blank for Remove disputes	Must be left blank for Remove disputes	Must be left blank for Remove disputes		
HIOS	Coverage Year	Action	FFM Internal Record Inventory Number	FFM Exchange Assigned Policy ID	Segment ID	FFM Exchange Assigned Subscriber Identifier	Issuer Agent Broker First Name	Issuer Agent Broker Middle Name	Issuer Agent Broker Last Name	Issuer Agent Broker Suffix	Issuer Agent Broker NPN	Issuer Assigned Dispute Control Number	Comments

- Issuers may populate the FFM Internal Record Inventory Number field instead of the Segment ID field for prior year disputes.

Avoiding RJ13 Disposition Codes

- Issuers receive disposition code RJ13 when a dispute submitted for a dependent should have been made at the subscriber level.
 - Rule Description: Dispute is for a Dependent
 - Issuer Verbiage: *The dispute was not able to be processed for an update. The update failed to process because the issuer has requested a change at the dependent level. Updates to the coverage dates and financials should be submitted at the subscriber level.*
- Issuers should always use the subscriber record's FFM Internal Record Inventory Number unless the dispute is specific to the dependent record.
- Issuers can submit the following dispute types for dependent records:
 - Gender
 - Tobacco Status
 - Issuer Assigned Member ID
 - Issuer Assigned Subscriber ID
 - Issuer Assigned Policy ID

Form 1095-As Sent to Consumers Due to Issuer Enrollment Data Updates



*Metrics for Updates
Submitted [4/15/2019-
5/15/2019]*

Presentation Date: 6/6/2019

Number of Form 1095-As Generated Due to All Issuer Updates*

Updates Submitted	PY 2017	PY 2018
4/15/2019-5/15/2019	1,987	19,633
Year to Date (YTD) Total for PY 2017 (1/15/2019-5/15/2019)	8,277	
YTD Total for PY 2018 (2/15/2019-5/15/2019)	201,893	
Grand Total (PY 2017 & PY 2018)	210,170	

*Issuer-submitted updates include:

- Inbound (IC) 834 submissions
- Inbound Enrollment Reconciliation (RCNI) file submissions
- Corrections made through enrollment resolution and reconciliation (ER&R) disputes

****Note:** These metrics do NOT align with the Form 1095-A IPA file. The FMCC enrollment alignment report reflects issuer-initiated enrollment data updates and the IPA reflects consumer-initiated enrollment data updates.

What Issuers Need to Know

- Forms 1095-A impact consumers' Federal income tax liability, and thus consumers may be very eager to know if they should expect a corrected Forms 1095-A
- If consumers receive corrected Forms 1095-A, they may:
 - Need to request an extension for filing their Federal income tax return
 - Be required to file an amended Federal income tax return
 - Be delayed in receiving their Federal income tax refund (which many individuals rely upon each year)
 - Need to pay back money received for their Federal income tax refund that was based on their initial Form 1095-A

Next Steps

- The Centers for Medicare & Medicare Services (CMS) encourages issuers to conduct targeted outreach to notify consumers that they will receive a corrected or voided Form 1095-A because of an update made to their enrollment data
- Pro-active outreach activities will:
 - Help alleviate concerns and confusion,
 - Prepare individuals to take action when they receive a corrected or voided Form 1095-A,
 - Mitigate the potential of increased call volume on Individual Services Call Centers, and;
 - Reduce issuers' Health Insurance Casework Systems (HICs) related workload and case complexity

Helpful Resources

- The **FMCC Enrollment Alignment Performance Summary (EAPS)** provides issuer specific metrics on a monthly basis. The FMCC dashboard is a helpful resource that issuers can reference to view metrics specific to themselves
- The **Form 1095-A Toolkit for Issuer Outreach to Individuals** provides resources to support issuers with communications to individuals who will receive corrected or voided Form 1095-As as a result of certain enrollment data updates that issuers submit to the FFE
- It is available here: https://zone.cms.gov/system/files/documents/toolkit_for_issuers_form_1095-a_final_clean.pdf
- Contents include:
 - A background section with **details about when an issuer update will trigger a corrected or voided Form 1095-A** and how individuals are impacted
 - **Sample issuer call scripts** which issuers can use when calling individuals
 - **Sample issuer outreach letters** which issuers can use as a template for written communications to individuals
 - **Frequently asked questions (FAQs)** on issuer outreach to individuals

Issuers can reach to their **Regional Office Account Managers** for additional support with refining their consumer outreach strategy beyond the resources offered in this Toolkit

Appendix: 2016 Off-Cycle Reconciliation Process

- Issuers are now free to submit 2016 Inbound Enrollment Reconciliation (RCNI16) Files for the upcoming off-cycle process
- Files must be submitted in the same fashion as typical production 2019 Enrollment Reconciliation (RCNI) Files, **using the current format**
- Files must be submitted with the following naming convention:
 - [Trading Partner ID].RCR.RCNI16.DYYMMDD.THHMMSSmmm.P.IN
 - Please note the new destination node **RCR** rather than MID that was in use in 2016
 - Issuers must ensure these files are sent to the Production environment for processing rather than any other lower environment; for security purposes, files containing PII/PHI must *never* be sent to lower environments
- The RCNI16 submission deadline for the 2016 Off-Cycle is **Monday, June 24th at 3PM EDT**
- Participating Issuers will receive a full 2016 Outbound Reconciliation (RCNO16) File following reconciliation processing
- As a reminder, CMS **will not** make any updates to FFE data during the off-cycle reconciliation process; Issuers **must** address any outstanding discrepancies through the dispute process

Q&A

