

Enrollment Reconciliation & IC834 Workgroup



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June 20, 2019

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IC834 – Housekeeping

- **The PO-IC834 reporting suite** (PO Summary, PO Detailed, and Reinstatement Detailed) for transactions submitted 6/11 – 6/17 is delayed; we expect reports to be sent out today, Thursday, June 20
 - Due to FFM system processing issues, some transactions from this period will not be reflected in your reports this week. You will see transactions that were not reflected in this week's report in next week's reporting suite.
 - If you have any questions about specific IC834 transactions submitted or report delivery, please contact Inbound834@bah.com

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

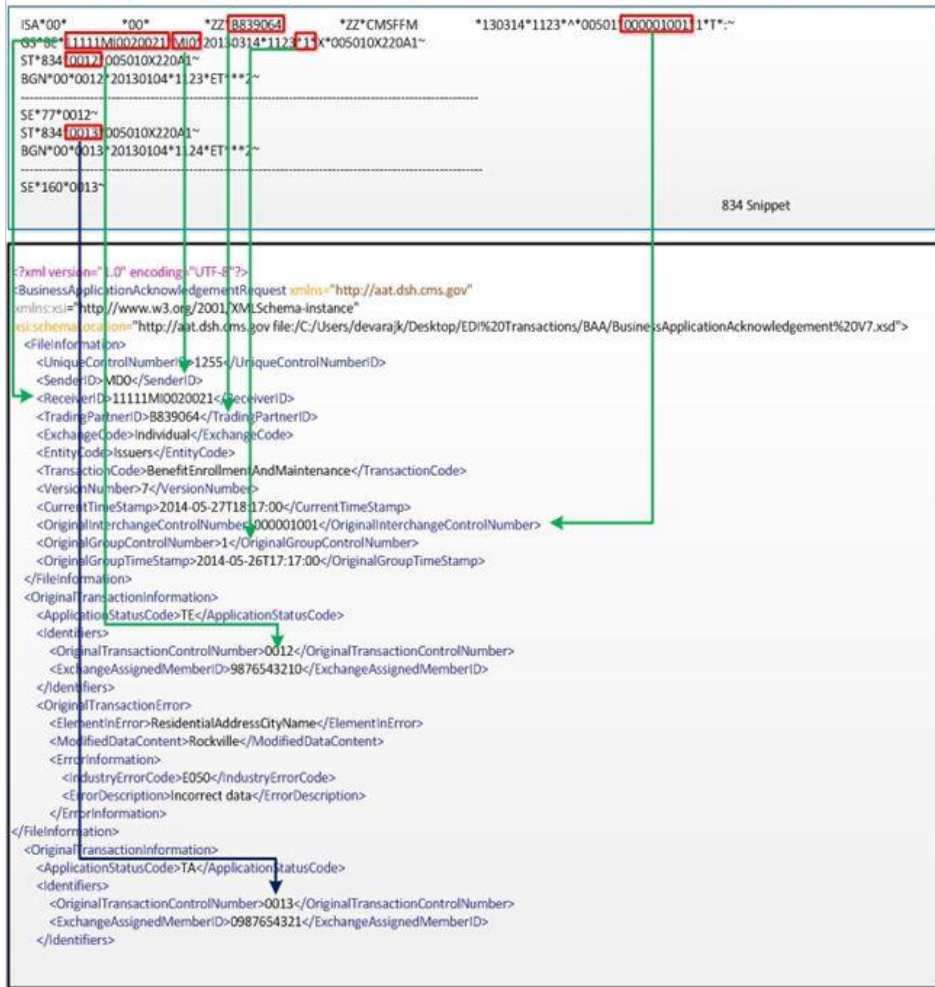
834 X12 Companion Guide Updates Made (Reminder)

IC834

- CMS has updated and published a new version of the 834 Companion Guide which is to be used in conjunction with the ASC X12 005010 TR3 Implementation Guide and CMS M834 Operations Manual. The new version, 4.1, can be downloaded from CMS zONE by visiting the link below. Issuers must have access to the Issuer Private Community in order to access the document.
- **Key Change** – added requirement for ISA 13 for IC834 (explained in Section 4.1.2 on pg. 5)
- **Link:** <https://zone.cms.gov/document/asc-x12-005010-834-companion-guide>

Matching criteria for BAA with IC834

Mapping for 834 (Inbound to CMS) to BAA



As per the ASC X12 005010 TR3 Implementation Guide, the following elements are used to match BAA with IC834

1. ISA05 – ISA07 (Interchange sender and receiver ID)
2. ISA13 – (Interchange control number)
3. GS02-GS03 (Group sender and receiver ID)
4. GS06 – Group control number
5. ST02 – Transaction set control number.

What Happens If An Issuer Generates the Same Interchange Control Number (ISA13)?

IC834

- File 1

```
ISA*00*          *00*          *ZZ*63XXXXXX0    *ZZ*CMSFFM          *190403*0800^*00501*000000001*1*P*:~
GS*BE*XXXXXXXX0370001*XX0*20190403*0800*1*X*005010X220A1~
ST*834*000001*005010X220A1~
BGN*00*000000001-000000001-000000001-0-20190403-08005062*20190403*08005062*CS***2~
CTV*FT*1~
```

- File 2

```
ISA*00*          *00*          *ZZ*63XXXXXX0    *ZZ*CMSFFM          *190403*0800^*00501*000000001*1*P*:~
GS*BE*XXXXXXXX0370001*XX0*20190403*0800*1*X*005010X220A1~
ST*834*000001*005010X220A1~
BGN*00*000000001-000000001-000000001-0-20190403-08005540*20190403*08005540*CS***2~
```

ISA13

- In this example, only the BGN control numbers are different which is not reported in the BAA file. If an Issuer receives a negative BAA, they will likely have difficulty matching the files to their internal database
- NOTE: Even if records are different (Diff Exchange IDs) it is still difficult to match correct records.

Current Process

- Currently, MPEDI doesn't check for duplicate ISA control numbers for Inbound transactions. MPEDI successfully converts the X12 file to an XML file and sends to FFM for further processing
- FFM processes the XML
- In the case where there is a duplicate record, the system will generate a negative BAA for the second XML if the first XML was accepted
- Issuers only receive one BAA (negative) for these policies so they will never truly know if the first transaction was ever accepted
 - BAA reporting can be unclear and Issuers may also recognize conflicting policy status on their PO reports
- **To avoid these duplicate records, beginning June 28, CMS plans to reject X12 files with duplicate control number (ISA13) through MPEDI validations and Issuers will receive a negative TA1 if duplicates are present.** This will reduce unnecessary processing of duplicate data as well as improve analysis by uniquely identifying each and every Inbound transaction.

New Process

- As per the EDI-X12 TA1 Implementation Guide, there is a valid rejection code for Duplicate ISA control numbers.
- If the system receives the same ISA control number from a trading partner, MPEDI will reject the file with TA1 as shown below.

```
ISA*00*          *00*          *ZZ*CMSFFM          *ZZ*63XXXXXX0 *190403*1432*^*00501*000000001*0*T*:~
TA1*000000001*190403*0800*R*025~
IEA*0*000000001~
```

- TA104 = 'R' and **TA105 = '025'**
 - TA101 = ISA control number [ISA 13 of rejected IC834]
 - TA102 = Interchange date [ISA 9 of rejected IC834]
 - TA103 = Interchange time [ISA 10 of rejected IC834]
 - TA104 = Status of file
 - TA105 = Error codes

New Process (cont.)

- Because an ISA13 sent by an Issuer after June 28 cannot be duplicated, CMS recommends that Issuers use values in sequential order for ease of tracking.
 - Example: Issuer sends ISA13 of 000000001, then a new ISA13 of 000000002, next 000000003, etc.). However, this is not a requirement, but rather a recommendation.
- Additionally, ISA13 values used prior to June 28 can be used again **one time** after the new validation is added on June 28.
 - Example, prior to June 28, an Issuer has used an ISA13 of 000000001 on an IC834 X12 file. After June 28, the Issuer may use this value again **once**, as the system will not be looking at ISA13 used prior to June 28, but rather any ISA13 sent after this date.

Housekeeping: Pre-Audit & Reconciliation

- **Prior Plan Years (2014-2018)**
 - 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 scheduled for delivery to Issuers later today, Thursday, June 20th
- **Plan Year 2016**
 - This month's 2016 FFM extract was taken on Saturday, June 15th at 6PM EDT
 - Comprehensive 2016 Enrollment Pre-Audit (AUD16) Files based upon that extract are scheduled for delivery to Issuers later today, Thursday, June 20th
 - The **RCNI16** submission deadline for the June 2016 Off-Cycle Run is **Monday, June 24th at 3PM EDT**
 - As of 10:30AM EDT today, we have received **RCNI16** files from just over 25% of 2016 FFM Issuers

REMINDERS: 2016 Off-Cycle Reconciliation Process

- Files must be submitted in the same fashion as typical production 2019 Enrollment Reconciliation (RCNI) Files, **using the current format**
 - LINK TO CURRENT RCNI FILE SPECIFICATION:
https://zone.cms.gov/system/files/documents/inbound_enrollment_reconciliation_file_specification_v4_1.pdf
- 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
 - If you have submitted your 2016 files and have not received file-level validation results, please e-mail recon_issuer_support@bah.com immediately; provide the filename submitted so we can check for receipt and any issues with file naming and routing**
- Participating Issuers will receive a full 2016 Outbound Reconciliation (RCNO16) File following reconciliation processing – these files are scheduled for distribution on Friday, June 28th
- 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

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2017**

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

- **Plan Year 2018**

- This month's 2018 FFM extract was taken on Saturday, June 15th at 6PM EDT
- Comprehensive Enrollment Pre-Audit (AUD8) Files based upon that extract were delivered to Issuers on Tuesday, June 18th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2019**
 - This month's 2019 FFM extract was taken on Saturday, June 15th at 6PM EDT
 - Comprehensive Enrollment Pre-Audit (AUD9) Files based upon that extract were delivered to Issuers on Tuesday, June 18th
 - Date of Birth Cleanup (MISC9) Files were also distributed to impacted Issuers on Tuesday, June 18th
 - The RCNI9 submission deadline for June's Run 7 is **TODAY Thursday, June 20th at 3PM EDT**
 - As of 11AM EDT today, we have received RCNI9 files for Run 7 from only **90.2%** of 2019 FFM Issuers

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.
 - ER&R has updated the version of the form that was available last week. Issuers who downloaded the form from the 06/13/2019 call should replace it with the improved version available today.
 - The new 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
 - Addition of HICS Case ID on relevant tabs to allow processing of prior year disputes
 - 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 zC 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 <i>Initial Premium Paid Status</i> 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 <i>Initial Premium Paid Status</i> 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
 - Added HICS Case 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	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	HICS Case ID	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
 - Added HICS Case 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		
Contact the ER&R Support Center for assistance using this form: 1-855-591-7113 or ERRSupportCenter@cognosante.com		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.
		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	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	HICS Case ID	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. 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. 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									
Telephone Number												
Email Address												
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
 - Added HICS Case 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 zC 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	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	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.

Enrollment Dispute Form v12: Walkthrough

- Agent Broker Information tab changes:
 - Added Segment ID column
 - Added HICS Case 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
Telephone Number	Agent Broker information in RCNI that is being requested using this form.
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 zC 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	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	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.

Q&A

