

Enrollment Reconciliation & IC834 Workgroup



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June 27, 2019

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Tuesday Issuer Technical Workgroup Call– Series I

Announcing Session Cancellation

CMS will **NOT** host an All-Issuer Technical Workgroup call on Tuesday, Tuesday, July 2, 2019.

CMS will **not** host the All Issuer Technical Workgroup Call on Tuesday, July 2, 2019 and the Thursday Recon IC834 call on Thursday July 4 in recognition of the Independence Holiday.

- The next Weekly Enrollment Issuer call after June 18, 2019 will resume, as scheduled on Tuesday, July 9, 2019. Please note there will be a new series starting only for the Tuesday Issuer Technical Workgroup Call. Further details to follow this slide.

New Series for the CMS Issuer Technical Workgroup Calls

The Tuesday Issuer Technical Workgroup will begin a new series on Tuesday, July 9, 2019 at 3:00 PM EST.

Please register at the following Webinar URLs are as follows:

Go to:

<https://meetings-cms.webex.com/meetings-cms/k2/j.php?MTID=t3ec7b39ecc27f4deb5844dc361761068>

Once the host approves your registration, you will receive a confirmation email with instructions for joining the session.

Things that will remain the same:

- CMS will ask issuers to continue to use the Thursday Recon-IC834 Workgroup call registration that they have stored and receive e-mail updates from messenger@webex.com. For reference registration information is below:

Note: CMS will continue to keep call participants informed of any further changes of the Cisco Web-EX platform.

IC834 – Housekeeping

- **The PO-IC834 reporting suite** (PO Summary, PO Detailed, and Reinstatement Detailed) for transactions submitted 6/18 – 6/24 were sent out yesterday
 - If you have any questions about specific IC834 transactions submitted or report delivery, please contact Inbound834@bah.com

IC834 – Housekeeping (cont.)

- OP834T/RI834T files for the Week of June 17
 - Instead of receiving one OP834T file with details on transactions submitted from 6/11 - 6/17 for the weekly PO Detailed Reports, issuers received multiple OP834T files on June 19 as well as another set on June 20. These files were sent in error.
 - Issuers should ignore any files received on June 19.
 - Issuers can pick any of the files received on June 20; these files are duplicates and each contains the same data.
- Please reach out to the IC834 Team at Inbound834@bah.com if you have any questions on this or need help interpreting the reports you receive

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 Error Codes

- A list of IC834 Error Codes can be found in the following places:
 - A summary list can be found on pg. 28 of the Inbound 101 presentation
 - https://zone.cms.gov/system/files/documents/inbound834_101_092018.pdf
 - A more detailed discussion of each error code in depth with troubleshooting tips can be found on pgs. 5 – 47 of the Inbound 301 presentation
 - https://zone.cms.gov/system/files/documents/inbound834_301_092618.pdf

IC834 Error Codes (cont.)

PO Reports

PO Summary Report Legend

Rejection due to Primary Matching		
Invalid/Missing Mandatory Fields	Incorrectly submitted mandatory fields that are required for transaction processing	E032, E087, E030, E126, E127, E128, E129, E130, E083, E035, E156, E159
4 Key Mis-Match	Incorrect values for the 4 Primary fields: QHPID, Exchange Assigned Policy ID, Exchange Assigned Subscriber ID, Benefit Begin Date (Effectuations Only)	E093, E046 (BenefitBeginDate) E050 (SubscriberID)
Invalid Transaction Type	Incorrectly submitted combination of the 3 Maintenance Reason Codes	E047, E098, E099, E100
Rejection due to Secondary Matching		
Secondary Fields Mis-Match	Secondary fields that are required for Matching	E046 (Except BenefitBeginDate), E135, E136, E137
Invalid Date	Incorrectly submitted policy dates	E051, E157
Invalid Policy Status Update	Invalid policy status change	E095, E133, E134, E146, E154
Duplicate Policy Status Update	Update to Policy status with the same status value. Error implies that the Marketplace has the same status as the IC834 and no additional steps required to be taken	E025
Others	Any errors that do not fall into the listed categories	E028, E138, E140, E141, E142, E143, E147, E152, E153, E155, W003, W135, W136, W137, W140, W142, W143, W146



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IC834 Error Codes (cont.)

Primary Matching Overview

- **FFM Primary Field Matching** is the initial validation to ensure the policy and the required action can be identified. The following items are checked:
 - The policy can be located based on 4 key fields
 - QHP ID, Policy ID, Benefit Begin Date and Exchange Assigned Subscriber ID
 - The requested policy status update is valid
 - Required fields have been submitted
- **Primary Matching BAA Error codes**
 - If an IC834 file is invalid or missing mandatory fields an Issuer may receive: E030, E032, E035, E083, E087, E126, E127, E128, E129, E130
 - If there is a mismatch within the 4 key fields on the IC834: E093, E046 (BenefitBeginDate), E050 (SubscriberID)
 - If the transaction type is invalid on the IC834: E047, E098, E099, E100
 - Maintenance Type Code, Maintenance Reason Code and Additional Maintenance Reason Code



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Housekeeping: Pre-Audit & Reconciliation

- **Prior Plan Years (2014-2018)**
 - 1095-A Consumer-Initiated Dispute Update (1095Ax) Files were delivered to Issuers yesterday, Wednesday, June 26th
 - The next set of 1095Ax Files is scheduled for distribution to Issuers on Thursday, July 11th
- **Plan Year 2016**
 - The **RCNI16** submission deadline for the June 2016 Off-Cycle Run was on Monday, June 24th at 3PM EDT
 - RCNO16 Files will be distributed to participating Issuers on Friday, June 28th
 - As a reminder, no updates will be applied to FFM enrollment data as a result of this off-cycle process
 - Next month's 2016 FFM extract will be taken on Monday, July 15th at 6PM EDT
 - Incremental Pre-Audit (ISIPA6) Files based upon that extract are scheduled for distribution to Issuers on Friday, July 19th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2017**

- Next month's 2017 FFM extract will be taken on Monday, July 15th at 6PM EDT
- Incremental Pre-Audit (ISIPA7) Files based upon that extract are scheduled for distribution to Issuers on Thursday, July 18th

- **Plan Year 2018**

- Next month's 2018 FFM extract will be taken on Monday, July 15th at 6PM EDT
- ***Incremental Pre-Audit (ISIPA8) Files*** based upon that extract are scheduled for distribution to Issuers on Wednesday, July 17th
 - The next Comprehensive 2018 Enrollment Pre-Audit File delivery is scheduled for September 2019

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2019**

- The RCNI9 submission deadline for June's Run 7 was last Thursday, June 20th at 3PM EDT
 - Once again, 100% of 2019 FFM Issuers submitted files for Run 7
 - RCNO9 Files were distributed to Issuers on Tuesday, June 25th
- Next month's 2019 FFM extract will be taken on Monday, July 15th at 6PM EDT
- Comprehensive Enrollment Pre-Audit (AUD9) Files based upon that extract are scheduled for distribution to Issuers on Wednesday, July 17th
 - Impacted Issuers will also receive Date of Birth Cleanup (MISC9) Files on Wednesday July 17th
- The RCNI9 submission deadline for July's Run 8 is **Thursday, July 18th at 3PM EDT**
 - **As a reminder, these files must be in the current v4.1 RCNI format**

Reminder: Pre-Audit v5.1 in July

- Changes to the Enrollment Pre-Audit File and all Incremental Pre-Audit Files to align with v5.1 will go into effect in the July 2019 cycle starting with the 2019 Pre-Audit File and 2018 Incremental Pre-Audit File to be delivered on Wednesday, July 17th
 - These changes were covered in detail on the May 2nd webinar; the presentation is available at: <https://zone.cms.gov//document/enrollment-reconciliation-and-ic834-workgroup-call-content>
- Key changes to the Pre-Audit File include:
 - Addition of the DOB Cleanup Indicator
 - Addition of the New Policy ID Indicator
 - Addition of the Cancellation Reason Code
 - Addition of the Termination Reason Code
- The Enrollment Pre-Audit File Specification v5.1 is available on CMS zONE at:
 - <https://zone.cms.gov/document/enrollment-data-reconciliation>

Reminder: 2019 Off-Cycle Reconciliation Process

- CMS will be conducting a 2019 off-cycle reconciliation process following July's Run 7
- This will provide Issuers an opportunity to test file submission in the new v5.1 format ahead of August's production Run 9
- Files must be submitted in the same fashion as typical production 2019 Enrollment Reconciliation (RCNI) Files
 - 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
- Issuers will be able to submit files in the v5.1 format and receive file-level validation results beginning **Monday, July 22nd**
- The RCNI9 submission deadline for the 2019 Off-Cycle is **Thursday, August 1st at 3PM EDT**
- Participating Issuers will receive a full 2019 Outbound Reconciliation (RCNO9) File in the v5.1 format following reconciliation processing
- As a reminder, CMS ***will not*** make any updates to FFM data during the off-cycle reconciliation process

Reminder: Enrollment Dispute Form v12

- ER&R will implement 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.
- **NOTE:** ER&R updated the version of the form that was available on the 06/13/2019 Recon call. Issuers who downloaded the form from the 06/13/2019 call should replace it with the improved version available today.
- Review the Recon slide deck from 06/20/2019 for additional information, available on zONE at <https://zone.cms.gov/document/enrollment-reconciliation-and-ic834-workgroup-call-content>

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.

Reminder: AM Approval on Prior Year Disputes

Issuers must get approval from their Account Manager (AM) before submitting prior year Enrollment or Payment Disputes to ER&R.

- Approval is not required for HICS Direct Disputes or prior year disputes that contain supporting HICS cases.
- Prior year disputes that are not approved and do not have a supporting HICS case will be returned to the issuer.
- Through September, disputes for 2016 policies do not need approval due to the off-cycle Reconciliation process.
- Issuers must email a completed Issuer Prior Year Approval Request Form to their AM. The form can be found on zONE at <https://zone.cms.gov/system/files/documents/issuerprioryearapprovalrequest.xlsx>.
- Upon receiving a confirmation email from ER&R, issuers should follow their existing procedures to submit the approved prior year disputes.
- For more information please consult the Prior Year Dispute Approval Master Guidance on zONE at <https://zone.cms.gov/system/files/documents/prioryeardisputeapprovalmasterguidance.pptx>.

Q&A

