

Enrollment Reconciliation & IC834 Workgroup



✓ **IC834**

- Housekeeping
- PY2018 Deadline (Reminder)
- Sending Effectuation Transactions

✓ **Recon**

- Housekeeping
- Additional 2016 Off-Cycle in September
- Reminders:
 - Pre-Audit v5.1 in July
 - 2019 Off-Cycle Reconciliation Process
- Updated Pre-Audit & Reconciliation Calendar Published to zONE
- Reconciling Agent/Broker Information

✓ **ER&R**

- Reminder: Enrollment Dispute Form v12

✓ **Q&A**

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IC834 – Housekeeping

- **The PO-IC834 reporting suite** (PO Summary, PO Detailed, and Reinstatement Detailed) for transactions submitted 7/9 – 7/15 were sent out yesterday
 - 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. For reference, these are the error codes issuers will receive for submitting transactions outside of the acceptable year range:
 - Effectuations: E126
 - Cancellations: E127
 - Terminations: E128
 - Maintenance: E129
 - Reinstatements: E156
- 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 – Sending Effectuation Transactions

- The IC834 team has received a number of questions related to when issuers should submit effectuation transactions and when policies are carried forward without requiring another effectuation transaction to be sent.
- The following scenarios **require an effectuation transaction to be sent**:
 - Consumer is new to the issuer (new initial policy)
 - CIC and change to HIOS ID, Line of Business (LOB), and/or Subscriber ID
 - CIC that creates gap in coverage
- The following scenarios **do not require an effectuation transaction**; the policy will be carried forward:
 - BAR'ed policy from prior year with no coverage gap
 - CIC, HIOS ID, Subscriber ID and LOB stay the same and there is no coverage gap

IC834 – Sending Effectuation Transactions (cont.)

Information can be found in the following documents:

- [2020 Open Enrollment Transaction Summary \(6/10/19\)](#)
 - Slides 16 – 18 cover auto & active reenrollment binder & effectuation confirmation scenarios
- [FFE and FF-SHOP Enrollment Manual \(7/10/19\)](#)
 - Section 7.1 starting on pg. 87 describes the rules on binder and effectuation confirmation
- [FFE Maintenance 834 Operations Manual \(v5\)](#)
 - Section 4.3 starting on pg. 188 covers the downstream impacts of maintenance transactions on IC834

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 to Issuers on Wednesday, July 24th
- **Plan Year 2016**
 - This month's 2016 FFM extract was taken on Monday, July 15th at 6PM EDT
 - Incremental Pre-Audit (ISIPA6) Files based upon that extract are scheduled for distribution to Issuers tomorrow, Friday, July 19th

Additional 2016 Off-Cycle in September

- Based upon Issuer request and the results of the June off-cycle, CMS will provide Issuers with another opportunity to reconcile 2016 enrollment data with an additional off-cycle run in September
- Files for this new off-cycle run will be due from Issuers by **3PM EDT on Thursday, September 4th**
 - Data submitted by Issuers will be compared to the full 2016 FFM extract taken on August 15th
- Issuers will submit files for this off-cycle process in the same fashion as typical production Enrollment Reconciliation (RCNI) Files, **using the new v5.1 format**
- Files will 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
- CMS will execute full Enrollment Reconciliation processing, using current recon business rules, and produce an outbound RCNO16 file for Issuers that participate in this off-cycle process
- As noted, CMS **will not** make any updates to FFM data during the off-cycle reconciliation process; Issuers **must** address any outstanding discrepancies through the dispute process
- As stated previously, CMS will run a 2016 off-cycle process in October; the file submission deadline for that off-cycle will be **3:00 pm EDT on Wednesday, October 30th**

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2017**
 - This month's 2017 FFM extract was taken on Monday, July 15th at 6PM EDT
 - Incremental Pre-Audit (ISIPA7) Files based upon that extract are scheduled for distribution to Issuers today, Thursday, July 18th
- **Plan Year 2018**
 - This month's 2018 FFM extract was taken on Monday, July 15th at 6PM EDT
 - ***Incremental Pre-Audit (ISIPA8) Files*** based upon that extract were delivered to Issuers yesterday, Wednesday, July 17th
 - The next Comprehensive 2018 Enrollment Pre-Audit File delivery is scheduled for September 2019

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2019**
 - This month's 2019 FFM extract was taken on Monday, July 15th at 6PM EDT
 - Comprehensive Enrollment Pre-Audit (AUD9) Files based upon that extract were delivered to Issuers on yesterday, Wednesday, July 17th
 - Impacted Issuers also received Date of Birth Cleanup (MISC9) Files yesterday, Wednesday July 17th
 - **Please Note:** This was the final Date of Birth Cleanup File delivery as the DOB Cleanup Indicator will be populated on the full Pre-Audit File starting this month
 - The RCNI9 submission deadline for July's Run 8 is **TODAY, July 18th at 3PM EDT**
 - **As of 11am, 86% have submitted 2019 Run 8 RCNI files**
 - **As a reminder, these files must be in the current v4.1 RCNI format**

Reminder: Pre-Audit v5.1 In Effect

- Changes to the Enrollment Pre-Audit File and all Incremental Pre-Audit Files to align with v5.1 are in effect; this started with the 2019 Pre-Audit and 2018 Incremental Pre-Audit Files delivered 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 8
- 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
- CMS will accept and validate files in the v5.1 format for the off-cycle starting **next 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

Updated Pre-Audit & Reconciliation Calendar Published to zONE

- On Wednesday, July 17th, CMS published an updated Pre-Audit & Reconciliation Calendar; the document is available on CMS zONE at:
 - <https://zone.cms.gov/document/pre-audit-and-reconciliation-and-file-specification>
- Updates in this version of the document include:
 - Added Slides from October to December
 - Updated Slide 3 with 2020 Function codes
 - Changed 2016 Incremental Preaudit extract to Full in August to support off-cycle run
 - Removed delivery of 2019 DOB Cleanup IPA from August

Reconciling Agent/Broker Information

- As a reminder, Enrollment Reconciliation is the proper method for Issuers to ensure the FFM has the correct Agent/Broker attribution for their enrollments
- This is necessary so that proper attribution is reflected on any FFM enrollment channel and carries forward to any future enrollment actions including auto-renewal for the following plan year
- Issuers are expected to send the proper NPN and name of the Agent/Broker on record for each enrollment record on the RCNI File
 - Records sent with only an NPN or name but not both will not be updated

Reconciling Agent/Broker Information

- If the information submitted by the Issuer is different from the information currently stored on the FFM for that enrollment it will be changed on the FFM, with the following caveats:
 - The record match must be even-sided (i.e. the same number of records for the enrollment group on both the Issuer and FFM side)
 - There is a current limitation that only one Agent/Broker can be attributed to an FFM policy, as defined by Exchange-Assigned Policy ID; sending different Agent/Broker information on different records for the same policy will prohibit any update to that information via automated reconciliation

Reconciling Agent/Broker Information

- **Please Note:** Agent/Broker information cannot be removed entirely (i.e. changing from an Agent/Broker attribution on a policy to no Agent/Broker) through automated reconciliation; removal of this information must be done via an ER&R Enrollment Dispute
- *Issuers should not attempt to circumvent this requirement by submitting dummy agent/broker information on the RCNI file*
- In the most recent 2019 reconciliation cycle (June's Run 7), nearly **40,000** records were submitted across the FFM with what appeared to be a dummy NPN – usually a series of 9s – and a name that indicated an internal Issuer group or that made clear it was not an actual agent or broker
- Agent/Broker information should **always** stay on the policy/app unless the consumer is directing the carrier to remove the agent/broker or change it to someone else because they have an updated Broker of Record letter
- In addition to removing/changing data inappropriately from a federal system, this action makes it difficult for CMS to run accurate data analysis and conduct program integrity efforts

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 is 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 details, 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.

Q&A

