

Enrollment Reconciliation & IC834 Workgroup



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July 25, 2019

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IC834 – Housekeeping

- **The PO-IC834 reporting suite** (PO Summary, PO Detailed, and Reinstatement Detailed) for transactions submitted 7/16 – 7/22 is delayed. Reports will be sent out as soon as the issue is resolved.
 - If you have any questions about specific IC834 transactions submitted or report delivery, please contact Inbound834@bah.com

IC834 – Housekeeping (cont.)

- **IC834 Processing**

- Due to system maintenance, IC834 processing will be delayed beginning around 5pm EST Wednesday, July 24, and will persist until Friday, July 26.
- Issuers who submit IC834 files past 5pm EST on July 24 can expect a delay in files being processed by the FFM until processing resumes on July 26. Issuers are encouraged to continue to submit IC834 files during the downtime and can expect to receive X12 functional acknowledgements in the form of TA1/999.
- Issuers can expect to receive BAAs for files submitted prior to the beginning of the downtime on the evening of July 24. There should not be an impact to PO reports which will be disseminated to issuers on Wednesday, July 31.
- If further downtime is needed, CMS will communicate these changes to issuers, and notification will also be given once processing resumes. We apologize for any inconvenience this may cause for issuers.

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 – E046 Errors

- E046 errors can indicate either a Primary or Secondary Matching error, depending on the element in error
- **Primary Matching Errors**
 - FFM Primary Field Matching is the initial validation to ensure the policy and the required action can be identified.
 - One of the items checked is that the policy can be located based on 4 key fields (QHP ID, Policy ID, Benefit Begin Date and Exchange Assigned Subscriber ID).
 - An E046 error will be triggered if there is a mismatch with the Benefit Begin Date (Effectuation only).

IC834 – E046 Errors (cont.)

- **Secondary Matching Errors:** E046 can also indicate a variety of secondary field mismatches (with the exception of Benefit Begin date):

BAA Error Codes				Rejection Reasons
Error Code	Error Reason	Element in Error	Modified Data Content	
E046	Not Matching	EligibilityBeginDate	FFM Eligibility Begin Date	Effectuation or Maintenance IC834 transaction sent for IC834 Eligibility Begin date <> FFM Policy Eligibility Begin date
		Sponsor TaxPayer Identification Number	FFM Sponsor Other Identifier	Invalid (Sponsor)Taxpayer Identification Number
		Sponsor Other Identifier	FFM Issuer TaxPayer Identification Number	Invalid (Sponsor) Other Identifier
		Issuer TaxPayer Identification Number	FFM Subscriber Indicator	Invalid (Issuer) Taxpayer Identification Number
		Subscriber Indicator	FFM Subscriber ID	Invalid Subscriber Indicator
		Subscriber ID	FFM Exchange Assigned Member ID	Invalid Exchange Assigned Subscriber ID
		Exchange Assigned Member ID	FFM Insurance LineCode	Invalid Exchange Assigned Member ID
		Insurance LineCode	FFM Source Exchange ID	Invalid Insurance Line Code
		Source Exchange ID	FFM Sponsor TaxPayer Identification Number	Invalid Source Exchange ID

E046 - Troubleshooting

- If your IC834 transactions receive an E046 error, use the following to troubleshoot:
 - Negative BAA
 - Verify the data based on the Negative BAA
 - FFM IC834 PO Detailed Report
 - This report contains information for each transaction sent to the marketplace to assist with correcting the field in error

Exchange_Policy_Id_FFM_VAL	Exchange_Policy_Id_Ic834_Value	Exchange_Assigned_Subscriber_Id_FFM_Value	Exchange_Assigned_Subscriber_Id_Ic834_Value	Responsible_Person_FFM_Value	Sponsor_Taxpayer_Id_Ic834_Value
				123456789	121212122

- Once the IC834 value is corrected, an Issuer can resubmit the file in the following ways:

Resubmit IC834	Submit via Recon	Submit via ER&R
✓	✓	

Housekeeping: Pre-Audit & Reconciliation

- **Prior Plan Years (2014-2018)**
 - 1095-A Consumer-Initiated Dispute Update (1095Ax) Files were distributed to Issuers yesterday, Wednesday, July 24th
 - The next set of 1095Ax files is scheduled for distribution to Issuers on Wednesday, August 7th
- **Plan Year 2016**
 - Next month's 2016 FFM extract is scheduled for Thursday, August 15th at 6PM EDT
 - Comprehensive Enrollment Pre-Audit (AUD16) Files based upon that extract are scheduled for distribution to Issuers on Wednesday, August 21st
 - The RCNI16 submission deadline for the next 2016 off-cycle Reconciliation process is **Wednesday, September 4th at 3PM EDT**
 - As a reminder, these files must be submitted in the new v5.1 format

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2017**

- Next month's 2017 FFM extract is scheduled for Thursday, August 15th at 6PM EDT
- Comprehensive Enrollment Pre-Audit (AUD17) Files based upon that extract are scheduled for distribution to Issuers on Tuesday, August 20th

- **Plan Year 2018**

- Next month's 2018 FFM extract is scheduled for Thursday, August 15th at 6PM EDT
- Incremental Pre-Audit (ISIPA8) Files based upon that extract are scheduled for distribution to Issuers on Monday, August 19th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2019**
 - RCNO9 Files from July's Run 8 were distributed to Issuers on Tuesday, July 23rd
 - Next month's 2019 FFM extract is scheduled for Thursday, August 15th at 6PM EDT
 - Comprehensive Enrollment Pre-Audit (AUD9) Files based upon that extract are scheduled for distribution to Issuers on Monday, August 19th
 - The RCNI9 submission deadline for August's Run 9 is **Thursday, August 22nd at 3PM EDT**
 - As a reminder, these files must be submitted in the new v5.1 format

Reminder: 2019 Off-Cycle Reconciliation Process

- CMS is now accepting files for the upcoming 2019 off-cycle Reconciliation process
- This off-cycle provides 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
- As of Monday, July 22nd, CMS is validating files based upon the v5.1 format
- 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

Calendar Updates Posted to zONE

- As noted on last Thursday's call, CMS has published updates to the Pre-Audit and Reconciliation Calendar, as well as the Pre-Audit and Monthly IPA File Delivery Cadence Document
- These updates documents are available on zONE at:
 - <https://zone.cms.gov/document/pre-audit-and-recon-calendar-and-file-specification>
- Updates include:
 - File delivery schedule and deadlines through December 2019
 - Addition of 2020 Function Codes
 - Change from Incremental to Comprehensive 2016 Pre-Audit in August

EFT Function Codes

File Type	2016 Function Code	2017 Function Code	2018 Function Code	2019 Function Code	2020 Function code
Enrollment Pre-Audit File	AUD16	AUD17	AUD8	AUD9	AUD0
Monthly Incremental Pre-Audit (IPA) File	ISIPA6	ISIPA7	ISIPA8	ISIPA9	ISIPA0
Inbound Enrollment Reconciliation File (RCNI - Issuer to CMS)	RCNI16	RCNI17	RCNI8	RCNI9	RCNI0
Outbound Enrollment Reconciliation File (RCNO - CMS to Issuer)	RCNO16	RCNO17	RCNO8	RCNO9	RCNO0
1095-A Update Incremental Pre-Audit (IPA) File	1095Ax (where x is the final digit of plan year)				
Missing Outbound 834 IPA			MOIPA8	MOIPA9	MOIPA0
Passive Cancel IPA File			BARCN8	BARCN9	BARCN0
Ad Hoc Miscellaneous Files	MISC6	MISC7	MISC8	MISC9	MISC0

August 2019

Sun	Mon	Tues	Wed	Thurs	Fri	Sat
28	29	30	31 HIX 820 Delivery (6/15/19 FFM Extract)	Aug 1 2019 RCNI Due 3pm (OFFCYCLE)	2	3
4	5	6 Delivery to Issuers • 2019 RCNO File (OFFCYCLE)	7 Delivery to Issuers: • 1095A Dispute Correction IPA Files	8	9	10
11	12 IC834 Submission Due (@ 11:59pm for 2018 calendar year policies)	13 PPR Delivery 7/15/19 FFM Extract	14 Data Matching Outreach File	15 FFM Updated 2019 2019, 2017 & 2016 Pre- Audit Extract (6:00 pm ET) 2018 Incremental Pre- Audit Extract (6:00 pm ET)	16	17
18	19 Delivery to Issuers: • 2019 Pre-Audit File Delivery to Issuers: • 2018 Incremental Pre- Audit File	20 Delivery to Issuers: • 2017 Pre-Audit File Treasury Payment	21 Delivery to Issuers: • 2016 Pre-Audit File Delivery to Issuers: • 1095A Dispute Correction IPA Files	22 2019 RCNI Due 3pm	23	24
25	26 ER&R Dispute Submissions Due	27 Delivery to Issuers: • 2019 RCNO File	28	29	30 HIX 820 Delivery (7/15/19 FFM Extract)	31



September 2019

Sun	Mon	Tues	Wed	Thurs	Fri	Sat
1	2 Labor Day	3	4 2016 RCNI Due 3pm (OFFCYCLE)	5 Delivery to Issuers: • 1095A Dispute Correction IPA Files	6	7
8	9	10 Delivery to Issuers: • 2016 RCNO File (OFFCYCLE)	11	12 <i>Data Matching Outreach File</i>	13	14
PPR Delivery 8/15/19 FFMExtract						
FFM Updated 2019 2019 & 2018 Pre-Audit Extract (6:00 pm ET) 2017 & 2016 Incremental Pre-Audit Extract (6:00 pm ET)	16	17 Delivery to Issuers: • 2019 Pre-Audit File Delivery to Issuers: • 2018 Pre-Audit File	18 Delivery to Issuers: • 1095A Dispute Correction IPA Files Delivery to Issuers: • 2017 Incremental Pre- Audit File	19 2019 RCNI Due 3pm Delivery to Issuers: • 2016 Incremental Pre- Audit File	20 Treasury Payment	21
22	23 ER&R Dispute Submissions Due	24 Delivery to Issuers: • 2019 RCNO File	25	26	27	28
29	30 HIX 820 Delivery (8/15/19 FFM Extract)	Oct 1	2 Delivery to Issuers: • 1095A Dispute Correction IPA Files	3	4	5



October 2019

Sun	Mon	Tues	Wed	Thurs	Fri	Sat
29	30 HIX 820 Delivery (8/15/19 FFM Extract)	Oct 1	2 Delivery to Issuers: • 1095A Dispute Correction IPA Files	3	4	5
6	7	8	9	10 Data Matching Outreach File	11 PPR Delivery 9/15/19 FFMExtract	12
13	14 Columbus Day *BAR Wave 1 Starts (Subject to change) PPR Delivery 9/15/19 FFMExtract	15 FFM Updated 2019 2019 & 2016 Pre-Audit Extract (6:00 pm ET) 2018 & 2017 Incremental Pre-Audit Extract (6:00 pm ET)	16	17 Delivery to Issuers: • 2019 Pre-Audit File Delivery to Issuers: • 2018 Incremental Pre- Audit File Delivery to Issuers: • 1095A Dispute Correction IPA Files	18 Delivery to Issuers: • 2017 Incremental Pre- Audit File	19
20	21 Delivery to Issuers: • 2016 Pre-Audit File Treasury Payment	22	23	24 2019 RCNI Due 3pm	25	26
27	28 ER&R Dispute Submissions Due	29 Delivery to Issuers: • 2019 RCNO File	30 2016 RCNI Due 3pm (OFFCYCLE) Delivery to Issuers: • 1095A Dispute Correction IPA Files	31 HIX 820 Delivery (9/15/19 FFM Extract)	Nov 1st	2



November 2019

Sun	Mon	Tues	Wed	Thurs	Fri	Sat
27	28 ER&R Dispute Submissions Due	29 Delivery to Issuers: • 2019 RCNO File	30 2016 RCNI Due 3pm (OFFCYCLE) Delivery to Issuers: • 1095A Dispute Correction IPA Files	31 HIX 820 Delivery (9/15/19 FFM Extract)	Nov 1 st <i>*BAR Wave 1 Ends (Subject to change)</i>	2
3	4	5 Delivery to Issuers: • 2020 Missing Outbound 834 IPA File	6 Delivery to Issuers: • 2016 RCNO File (OFFCYCLE)	7	8	9
10	11 Veterans Day	12	13 Data Matching Outreach File 2020 Pre-Audit Extract (6:00 pm ET)	14 Delivery to Issuers: • 1095A Dispute Correction IPA Files	15 FFM Updated 2019 2019 Pre-Audit Extract (6:00 pm ET) 2018, 2017 & 2016 Incremental Pre-Audit Extract (6:00 pm ET) Delivery to Issuers: • 2020 Pre-Audit File	16
17	18	19 2019 RCNI Due 3pm Delivery to Issuers: • 2019 Pre-Audit File Delivery to Issuers: • 2018 Incremental Pre-Audit File Delivery to Issuers: • 2020 Missing Outbound 834 IPA File	20 Delivery to Issuers: • 2020 Passive Cancels IPA File Delivery to Issuers: • 2017 Incremental Pre-Audit File Treasury Payment	21 Delivery to Issuers: • 2016 Incremental Pre-Audit File Delivery to Issuers: • 2020 Carry-Forward Cancel 834s	22 Delivery to Issuers: • 2019 RCNO File	23
24	25 ER&R Dispute Submissions Due	26 Delivery to Issuers: • 2020 Missing Outbound 834 IPA File	27 Delivery to Issuers: • 2020 Passive Cancels IPA File	28 Thanksgiving Day	29 HIX 820 Delivery (10/15/19 FFM Extract)	30



December 2019

Sun	Mon	Tues	Wed	Thurs	Fri	Sat
Dec 1	2 2020 Pre-Audit Extract (6:00 pm ET)	3	4 Delivery to Issuers: • 2020 Pre-Audit File Delivery to Issuers: • 2020 Passive Cancels IPA File	5 2020 RCNI Due 3pm for Optional Run 0.5 Off-cycle (Subject to change)	6	7
8	9	10 Delivery to Issuers: • 2020 Missing Outbound 834 IPA File	11 Delivery to Issuers: • 2020 RCNO File for Optional Run 0.5 Off-cycle (Subject to change)	12	13	14
			PPR Delivery 11/15/19 FFMExtract			
15	16 *BAR Wave 2 Starts (Subject to change) 2020, 2019 & 2018 Pre-Audit Extract (3:00 am ET) 2017 & 2016 Incremental Pre-Audit Extract (3:00 am ET) Delivery to Issuers: • 2020 Carry-Forward Cancel 834s	17	18 Delivery to Issuers: • 2020 Pre-Audit File Delivery to Issuers: • 2020 Passive Cancels IPA File	19 2019 RCNI Due 3pm Delivery to Issuers: • 2019 Pre-Audit File Delivery to Issuers: • 2018 Pre-Audit File	20 Delivery to Issuers: • 2017 Incremental Pre-Audit File Delivery to Issuers: • 2016 Incremental Pre-Audit File Treasury Payment	21
22	23 ER&R Dispute Submissions Due	24	25 Christmas Day	26 2020 RCNI Due 3pm Delivery to Issuers: • 2019 RCNO File	27	28
29	30	31 *BAR Wave 2 Ends (Subject to change) Delivery to Issuers: • 2020 RCNO File HIX 820 Delivery (11/15/19 FFMExtract)	Jan 1 New Year's Day	2	3	4



Reminder: Manual Payment for Prior_Year UIEs

- As announced on the April 25, 2019 Recon Call, CMS posted an issuer letter to CMS zONE detailing how CMS will handle payment for the 2019 Prior_Year UIEs.
 - The letter was also distributed to issuers by the FMCC issuer outreach team.
 - The letter is posted on CMS zONE:
https://zone.cms.gov/system/files/documents/2019_uie_issuer_letter_.pdf
- Consumers need to call the Marketplace call center to utilize a 60-day Marketplace Error Special Enrollment Period (SEP).
 - ER&R contacted the impacted issuers to provide guidance on performing consumer outreach before June 1, 2019.
- At the end of the 2019 coverage year, CMS will make manual payments for any remaining 2019 Prior_Year UIEs for coverage through July 31, 2019. Form 1095-As will also be generated for these policies reflecting coverage through July 31, 2019.

Refresher: Avoiding Disposition Code FR7

- ER&R processes many Total Premium Amount disputes submitted without a HICS Case ID that do not fall under one of the exceptions.
- Not all Total Premium Amount disputes require a supporting HICS case. Issuers can access a list of exceptions on zONE in the following documents:
 - Combined Enrollment and Payment TRG
 - Disputes 101
 - HICS Direct Disputes Master Guidance
- Total Premium Amount disputes that require supporting HICS cases receive FR18 disposition codes if the HICS Case ID is not included in the dispute.
 - **Verbiage Returned to Issuer:** *ER&R is not able to accept the update requested. Either the subscriber information provided by the issuer is not associated with the HICS case, the HICS case provided is invalid, or the HICS case does not support the change requested. ER&R must use the Total Premium Amount in the HICS case; therefore, the Total Premium Amount was not changed in the FFM. The issuer needs to provide a valid HICS case and ensure the subscriber ID provided is associated to the application/HICS case on the dispute form or update their records to match the Total Premium Amount in the FFM, provided on the RCNO file. If you have any questions, please contact the ER&R Support Center at errsupportcenter@cognosante.com.*

Refresher: Avoiding Disposition Code FR18

- Disputes missing the FFM Internal Inventory Number (column E on the Discrepancy Dispute tab) receive FR18 dispositions.
 - **Verbiage Returned to Issuer:** *ER&R is unable to process the dispute because the required fields and/or appropriate situational fields were not submitted on the form correctly. Please refer to the Dispute Examples tab on the Enrollment Dispute Form or contact the ER&R Support Center at errsupportcenter@cognosante.com.*
- All dispute categories on the Discrepancy Dispute tab require the FFM Internal Inventory Number EXCEPT Prior Year – End Date disputes.
 - Prior Year – End Date disputes with no FFM Internal Inventory Number must include the FFM Exchange Assigned Policy ID (column F) and FFM Benefit Start and End Dates (columns L and M).
- Leaving other fields blank can also result in an FR18 disposition. These include:
 - HIOS (column B)
 - Coverage Year (column C)
 - FFM Exchange Assigned Subscriber ID (column G)
 - The dispute type from the Description of Disputed Item field (column H)
 - Issuer Value (column I)
- For specific guidance on required information, review the tool tips on the column headers or the Dispute Examples tab of Enrollment Dispute Form v11.

Q&A

