

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 7/23 – 7/29 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 – Anti Duplication

- The IC834 Team would like to remind issuers about when to use Cancel-Antiduplication versus Term-Antiduplication code combinations:
- **CANCEL-ANTIDUPLICATION**
 - It is used when an issuer receives an initial enrollment from the FFM and they have knowledge that issuing a QHP would duplicate the consumer's benefits because they are already enrolled in Medicare.
 - Can be sent any time during the plan year
- **TERM-ANTIDUPLICATION**
 - Used to prevent a current year policy from being auto-renewed to the next plan year.
 - Submitted with an end date of 12/31
 - Not permitted to be sent prior to 10/1

Housekeeping: Pre-Audit & Reconciliation

- **Prior Plan Years (2014-2018)**
 - The next set of 1095-A Consumer-Initiated Dispute Update (1095Ax) Files are scheduled for distribution to Issuers on Wednesday, August 7th
- **Plan Year 2016**
 - This 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 v5.11 format

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2017**

- This 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**

- This 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**
 - This 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 RCN19 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 v5.11 format

Reminder: 2019 Off-Cycle Reconciliation Process

Deadline Today

- CMS is providing a 2019 off-cycle Reconciliation process to allow Issuers an opportunity to test file submission in the new v5.11 format ahead of August's production Run 9
- The RCNI9 submission deadline for the 2019 Off-Cycle is **today, Thursday, August 1st at 3PM EDT**
- 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
- Participating Issuers will receive a full 2019 Outbound Reconciliation (RCNO9) File in the v5.11 format following reconciliation processing
 - As a reminder, CMS **will not** make any updates to FFM data during the off-cycle reconciliation process

Updated Documentation Posted to zONE

- As a reminder, CMS recently 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>
- CMS has also published an updated Standard Enrollment Files Document (v2.7) to reflect the files currently being distributed to Issuers on a regular basis and minor updates to the new Pre-Audit, RCNI, and RCNO File Specs (v5.11)
 - The only change to the file specs is adding two new Cancellation/Termination Reason Code values (13 – Death and 14 – Rescission) to align with the implementation of those new AMRCs
 - There is no change to the file structure from v5.1 in v5.11
 - These documents are available on zONE at:
 - <https://zone.cms.gov/document/enrollment-data-reconciliation>

Updated Cancellation/Termination Reason Code Table

Reference Code	Description	Inbound/ Outbound	Cancel AMRC	Termination AMRC
1	Voluntary Withdrawal	Outbound	CANCEL	TERM
2	No Longer Eligible (NLE) Due to Unresolved Data Matching Issue (DMI)	Outbound	CANCEL-NLE	TERM-NLE
3	Change in Circumstance (CIC)	Outbound	CANCEL-CIC	TERM-CIC
4	Stop QHP Due to Other Coverage	Outbound	n/a	TERM-OTH-COVERAGE
5	BAR Carry-Forward Cancel	Outbound	CANCEL-CARRYFORWARD	n/a
6	Non-Payment	Inbound	CANCEL	TERM
7	Free Look Cancel	Inbound	CANCEL-FLC	n/a
8	HICS	Inbound	CANCEL-HICS	TERM-HICS
9	Fraud	Inbound	CANCEL-FRD	TERM-FRD
10	Anti-Duplication	Inbound	CANCEL-ANTIDUPLICATION	TERM-ANTIDUPLICATION
11	Out of Area	Inbound	CANCEL-OUT-OF-AREA	n/a
12	Other	Inbound	CANCEL-OTH	TERM-OTH
13	Death	Outbound	CANCEL-PDM	TERM-PDM
14	Rescind Coverage	Inbound	CANCEL-RESCIND	n/a

Semi-Monthly Detailed Report Distribution

- Due to a technical issue, ER&R will not distribute semi-monthly reports to issuers as scheduled today. The reports will be delivered on Monday, August 5th instead.
- The August 5th reports will be distributed as normal via Electronic File Transfer (EFT) using the ERRD function code for enrollment disputes and ERRZ function code for payment disputes.

Refresher: HICS Direct Dispute Submission Requirements

- Issuers recently submitted both a HICS Direct Dispute and an Enrollment Dispute for the same HICS case at the same time.
- Issuers should not submit Enrollment Disputes for updates that are submitted through the HICS Direct Dispute process.
- For dispute types eligible for the HICS Direct Disputes:
 - If the HICS Case is Open, or if it has been closed for less than 30 days, the issuer should submit through the HICS Direct Dispute Process.
 - If the HICS Case is closed for more than 30 days, the issuer should submit the update through the Enrollment Dispute Form.
- ER&R processed a number of cases without a comment or containing a comment that doesn't meet the requirements for that type of dispute.
 - When submitting a HICS Direct Dispute, issuers must enter a note in the HICS Case to provide ER&R with guidance on the requested corrections.
 - Issuers should not enter the filename of the Dispute Form that they submitted to ER&R as a comment.
 - Issuers should consult the HICS Direct Disputes Master Guidance and HICS Direct Dispute Cheat Sheet for guidance regarding creating appropriate comments:
<https://zone.cms.gov/document/enrollment-resolution-and-reconciliation>

Q&A

