

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 7/30 – 8/5 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 – Secondary Matching Errors (E025)

- Duplicate submissions (E025) are a result of an Issuer attempting to apply an update that was already recorded in the FFM.
- There are a few reasons an Issuer may receive the negative BAA error code of E025:
 - Sending an IC834 transaction type for a policy that was already updated to the desired status **by IC834**
 - E.g. Issuer sends effectuation IC834 on 4/1 for a policy that received and applied an effectuation IC834 on 3/29
 - Sending an IC834 transaction type for a policy that was updated to the desired status **by Reconciliation**
 - E.g. Issuer sends a termination IC834 on 5/1 for a policy that was terminated through Inbound Reconciliation on 4/15
 - Sending an IC834 transaction type for a policy that was updated to the desired status **by another FFM job**
 - E.g. Cancellation IC834 sent for a policy that was cancelled through carry-forward cancel

IC834 – Secondary Matching Errors (E025), cont.

- E025 errors are excluded from outreach for low acceptance rate.
- However, we encourage issuers to closely monitor the status of IC834 submissions as conveyed through the weekly PO Summary, PO Detailed, and Reinstatement Detailed reports. Additionally, issuers should also track submissions made through other Enrollment Data Alignment channels (monthly Reconciliation and ER&R) in order to reduce the potential for duplicate submission through IC834. Large volumes of duplicate transactions can impact system processing at high volume times such as Open Enrollment.

Housekeeping: Pre-Audit & Reconciliation

- **Prior Plan Years (2014-2018)**
 - 1095-A Consumer-Initiated Dispute Update (1095Ax) were distributed to Issuers yesterday, Wednesday, August 7th
 - The next set of 1095Ax Files are scheduled for distribution to Issuers on Wednesday, August 21st
- **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

2019 Off-Cycle Reconciliation Process

- CMS has completed the 2019 off-cycle Reconciliation process, providing 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 was last Thursday, August 1st at 3PM EDT
- Participating Issuers were sent a full 2019 Outbound Reconciliation (RCNO9) File in the v5.11 format on Tuesday, August 6th
 - As a reminder, CMS **will not** make any updates to FFM data during the off-cycle reconciliation process
- Common issues found in the off-cycle:
 - File-Level validation failure due to incorrect number of fields
 - Remember, there should be no trailing pipes on RCNI records
 - Leading zeroes on Cancellation and Termination Reason Codes
 - These codes should be one- or two-character numeric codes with no leading zero, i.e. **6** for non-payment rather than 06

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	CANCELCIC	TERMCIC
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

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 updated 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 Data 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>

Avoiding Disposition Code RU30

- Disputes received an RU30 disposition code if the overall record flag is R for the disputed record.
- An overall record flag of R is similar to an I record in that it indicates that the issuer record has no matching FFM record. However, in the case of an R record, there is a matched record containing issuer and FFM information for that same consumer, HIOS, and line of business.
- If an Issuer wishes to dispute the matched record, they should make sure to use the FFM Internal Inventory Number for the record containing both issuer and FFM data instead of the record with an overall record flag of R.
- **Verbiage Returned to Issuer:** *ER&R is unable to process your dispute. The record being disputed has an overall record flag of R, which represents an extra issuer record for the consumer. Please review the RCNO file and ensure the coverage period/amount is appropriately reflected in a matched record. If it is not, dispute the appropriate matched record where the FFM and Issuer values are present. When sending the new dispute to ER&R, please supply the FFM Internal Inventory Number associated to this record for the dispute to be resolved.*

Avoiding Disposition Code RU30 (Cont.)

- If an issuer submits multiple records for the same member and one (or more) is matched, any others will become Leftover Unmatched Issuer Enrollments or R records.
- If a record is assigned an R flag, other records within that enrollment group will typically be assigned and overall record flag of E or P.

ISSUER_PRN N_1ST_NAME	ISSUER_PRN N_LAST_NAME	FFM_PLAN_ PLCY_ID	ISSUER_PLA N_PLCY_ID	FFM_PLAN_ BNFT_STRT_DT	ISSUER_PLA N_BNFT_STRT_DT	FFM_PLAN_ BNFT_END_DT	ISSUER_PLA N_BNFT_END_DT	FFM_PLCY_ APTC_AMT	ISSUER_PLA Y_APTC_AMT	FFM_PLCY_ TOT_PRM_AMT	ISSUER_PLA Y_TOT_PRM_AMT	FTI_ISSUER_ OVERALL_RECORD_FLAG
Miles	Morales	12345678	12345678	1/1/2019	1/1/2019	6/30/2019	6/30/2019	\$650	\$650	\$795	\$795	P
Miles	Morales		12345678		7/1/2019		12/31/2019		\$650		\$795	R

- In this example, if the issuer intends to reinstate coverage – extending the end date from 6/30/2019 to 12/31/2019 – that should be done by changing the end date on the single matched record to 12/31/2019 rather than adding a new record for the reinstated period of coverage

Avoiding Disposition Code RU30 (Cont.)

- Issuers should review all RCNO records related to any member with an R record and ensure that:
 - The records on the next RCNI submission include the same number of coverage spans reflected in FFM data.
 - That no duplicate records are reported on their next RCNI submission.
- Some R flags will be caused by timing issues when an issuer makes a change as the result of an 834 or HICS case before the change is made within the FFM database.
 - If the change is part of a HICS case that is updating financial records or for an Enrollment Blocker, issuers should send the HICS case to ER&R as a HICS Direct Dispute.
 - If the change was made due to receipt of an 834 transaction following the FFM extract for the month, issuers should monitor the subsequent RCNO file to ensure proper alignment in subsequent cycles.

zONE Publications

- ER&R released the following updated document:
 - The ***Combined Enrollment and Payment TRG v8.0*** contains additional details regarding AM approvals on prior year disputes and the AM Prior Year Approval Master Guidance.
- Access the updated documentation on CMS zONE at <https://zone.cms.gov/document/enrollment-resolution-and-reconciliation>.

Q&A

