

Enrollment Reconciliation & IC834 Workgroup



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August 29, 2019

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Number of Form 1095-As Generated Due to All Issuer Updates*

Updates Submitted	PY 2017	PY 2018
7/15/2019-8/15/2019	875	4,058
Year to Date (YTD) Total for PY 2017 (1/15/2019-8/15/2019)	12,625	
YTD Total for PY 2018 (2/15/2019-8/15/2019)	223,520	
Grand Total (PY 2017 & PY 2018)	236,145	

*Issuer-submitted updates include:

- Inbound (IC) 834 submissions
- Inbound Enrollment Reconciliation (RCNI) file submissions
- Corrections made through enrollment resolution and reconciliation (ER&R) disputes

****Note:** These metrics do NOT align with the Form 1095-A IPA file. The FMCC enrollment alignment report reflects issuer-initiated enrollment data updates and the IPA reflects consumer-initiated enrollment data updates.

What Issuers Need to Know

- Forms 1095-A impact consumers' Federal income tax liability, and thus consumers may be very eager to know if they should expect a corrected Forms 1095-A
- If consumers receive corrected Forms 1095-A, they may:
 - Need to request an extension for filing their Federal income tax return
 - Be required to file an amended Federal income tax return
 - Be delayed in receiving their Federal income tax refund (which many individuals rely upon each year)
 - Need to pay back money received for their Federal income tax refund that was based on their initial Form 1095-A

Next Steps

- The Centers for Medicare & Medicare Services (CMS) encourages issuers to conduct targeted outreach to notify consumers that they will receive a corrected or voided Form 1095-A because of an update made to their enrollment data
- Pro-active outreach activities will:
 - Help alleviate concerns and confusion,
 - Prepare individuals to take action when they receive a corrected or voided Form 1095-A,
 - Mitigate the potential of increased call volume on Individual Services Call Centers, and;
 - Reduce issuers' Health Insurance Casework Systems (HICs) related workload and case complexity

Helpful Resources

- The **FMCC Enrollment Alignment Performance Summary (EAPS)** provides issuer specific metrics on a monthly basis. The FMCC dashboard is a helpful resource that issuers can reference to view metrics specific to themselves
- The **Form 1095-A Toolkit for Issuer Outreach to Individuals** provides resources to support issuers with communications to individuals who will receive corrected or voided Form 1095-As as a result of certain enrollment data updates that issuers submit to the FFE
- It is available here: https://zone.cms.gov/system/files/documents/toolkit_for_issuers_form_1095-a_final_clean.pdf
- Contents include:
 - A background section with **details about when an issuer update will trigger a corrected or voided Form 1095-A** and how individuals are impacted
 - **Sample issuer call scripts** which issuers can use when calling individuals
 - **Sample issuer outreach letters** which issuers can use as a template for written communications to individuals
 - **Frequently asked questions (FAQs)** on issuer outreach to individuals

Issuers can reach to their **Regional Office Account Managers** for additional support with refining their consumer outreach strategy beyond the resources offered in this Toolkit

IC834 – Housekeeping

- **The PO-IC834 reporting suite** (PO Summary, PO Detailed, and Reinstatement Detailed) for transactions submitted 8/20 – 8/26 were sent out yesterday.
 - If you have any questions about specific IC834 transactions submitted or report delivery, please contact Inbound834@bah.com

New IC834 Cancel AMRC for Approved Rescissions (Issuer to FFE)

- Issuers of individual health insurance coverage, including Qualified Health Plans (QHPs) offered through an Exchange, may only rescind such coverage when the individual (or a person seeking coverage on behalf of the individual) performs an act, practice, or omission that constitutes fraud, or makes an intentional misrepresentation of a material fact, as prohibited by the terms of the plan or coverage.
- Elements:
 - **Falsity of Information** – the issuer must demonstrate that the enrollee or person acting on their behalf provided false information to obtain FFE coverage.
 - **Intent** – the issuer must establish that the misrepresentation was intentional.
- Please see the following REGTAP link for more information on Issuer Rescissions:
https://www.regtap.info/uploads/library/ENR_RescissionRefresher_5CR_092418.pdf
- *New AMRC for Approved Rescissions Accepted by FFE Beginning 9/13/19*

IF Maintenance Type Code (INS03)	AND Maintenance Reason Code (INS04)	AND Additional Maintenance Reason Code (2750 Loop)	THEN Transaction Type (derived by FFM)
024	07	CANCEL-RESCIND	CANCELLATION

- The AMRC of CANCEL-FRD should still be used by Issuers for fraud cancellations where the enrollee was not an acting or knowledgeable party to the fraud.

FFE to Begin Rejecting TERM-FRD Transactions

- Beginning September 13, 2019, the FFE will begin rejecting IC834 transactions that use an AMRC of TERM-FRD
- If Issuers send an IC834 termination using an AMRC of TERM-FRD, they will receive an **E100** (Error in AMRC) rejection
- Issuers should be cancelling fraudulent policies using AMRCs of CANCEL-FRD or CANCEL-RESCIND depending on the scenario and guidance provided by CMS
- CMS encourages Issuers to not decommission the TERM-FRD AMRC in their systems as CMS policy could change in the future which may permit this AMRC to be used.

New Error Code for Inbound Maintenance (IC834 Maintenance Transactions)

- The FFM currently accepts Issuer initiated maintenance transactions through IC834 to update the following values:
 - Issuer Assigned Policy ID
 - Issuer Assigned Subscriber ID
 - Issuer Assigned Member ID
- One required element of an IC834 Maintenance transaction is the Eligibility Begin Date (DTP*356)
- In an attempt to communicate clearer reasons for negative BAAs to Issuers, beginning September 13, 2019, CMS will implement a new error code of **E162 (Eligibility Begin Date)** by pairing it with existing error codes
- If Issuers omit the Eligibility Begin Date in an IC834 Maintenance transaction, they will receive errors of **E146 (Maintenance Transaction), E162 (Eligibility Begin Date), E032 (Situational Required Element is Missing)**
- If Issuers use an incorrect Eligibility Begin Date (i.e. not matching FFE coverage start date), they will receive errors of **E146 (Maintenance Transaction), E162 (Eligibility Begin Date), E046 (Not Matching)**

IC834 – Resources Available

- Educational material is available on CMS zOne to support Issuer performance
 - [CMS zOne IC834 Site](#)
 - **IC834 Education Suite** – note: these documents were updated on August 29th
 - [IC834 101](#) – *Overview of Inbound834*
 - [IC834 201](#) – *Preparing and Submitting Inbound834s*
 - [IC834 301](#) – *Troubleshooting and Resolving Rejections*
 - **ASC X12 834 Companion Guide**
 - [ASC X12 834 Companion Guide](#) – *guidance on creating X12 files*
 - **OP834T Specifications Document**
 - [PO-IC834 FFM \(OP834T\) MIDAS to Issuer Outbound Specification](#) – *file specifications for weekly detailed PO Report files*

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 Thursday, September 5th
- **Plan Year 2016**
 - 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
 - Issuers are encouraged to submit as soon as possible to allow sufficient time for possible correction and resubmission in response to any file-level validation issues resulting from the format change
 - Data submitted on the RCNI16 files will be compared to the data extracted from the FFM on August 15th
 - Next month's 2016 FFM extract will be taken on Sunday, September 15th at 6PM EDT
 - Incremental Pre-Audit (ISIPA6) Files based upon that extract are scheduled for distribution to Issuers on Thursday, September 19th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2017**
 - Next month's 2017 FFM extract will be taken on Sunday, September 15th at 6PM EDT
 - Incremental Pre-Audit (ISIPA7) Files based upon that extract are scheduled for distribution to Issuers on Wednesday, September 18th
- **Plan Year 2018**
 - Next month's 2018 FFM extract will be taken on Sunday, September 15th at 6PM EDT
 - Comprehensive Enrollment Pre-Audit (AUD8) Files based upon that extract are scheduled for distribution to Issuers on Tuesday, September 17th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2019**
 - The RCNI9 submission deadline for August's Run 9 was last Thursday, August 22nd at 3PM EDT
 - Participating Issuers received an RCNO9 File on Tuesday, August 27th
 - Next month's 2019 FFM extract will be taken on Sunday, September 15th at 6PM EDT
 - Comprehensive Enrollment Pre-Audit (AUD9) Files based upon that extract are scheduled for distribution to Issuers on Tuesday, September 17th
 - The RCNI9 submission deadline for September's Run 10 is Thursday, September 19th at 3PM EDT
 - **Please note:** Run 10 is the **FINAL** reconciliation cycle prior to Batch Auto-Renewal for PY2020

Issuer Enrollment Ops Training for 2020

- CMS has scheduled a series of training sessions targeted at Issuers new to the Marketplace for Plan Year 2020, any new Issuer personnel working with enrollment data, and any Issuer personnel interested in a refresher on the fundamentals of aligning enrollment data with the FFM
- This series will kick off on Wednesday, September 18th at Noon EDT and will continue each Wednesday for five weeks
 - Topics to be covered include Inbound 834 (IC834), Enrollment Pre-Audit and Reconciliation, Enrollment Disputes, Unmatched Issuer Records (UIRs), and the Enrollment Alignment Performance Summary (EAPS) Reports
- The September 18th session will cover:
 - Data Alignment 101
 - Introduction to IC834
- Registration will not be required for this series; webinar details will be shared in advance of the first session

Reminder: Enrollment Dispute Form v12

- ER&R will implement the new Enrollment Dispute Form v12 in October 2019.
 - ER&R will announce an exact implementation date as soon as possible.
- The 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.
- Issuers may review the Recon slide deck from 06/20/2019, available on zONE at <https://zone.cms.gov/document/enrollment-reconciliation-and-ic834-workgroup-call-content>, for additional details.

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

