

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 9/3 – 9/9 were sent out yesterday.
 - If you have any questions about specific IC834 transactions submitted or report delivery, please contact Inbound834@bah.com

IC834 – Anti Duplication

- The IC834 Team would like to remind issuers about when to use Cancel-Antiduplication versus Term-Antiduplication code combinations:
- **CANCEL-ANTIDUPLICATION**
 - Can be sent any time during the plan year
 - 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.
- **TERM-ANTIDUPLICATION**
 - Used to prevent a current year policy from being auto-renewed to the next plan year.
 - Issuers are only permitted to send these transactions from 10/1-12/31

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*

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 **next 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 is not required for this series; the following URL and dial-in information can be used to access the training sessions:
 - Webinar URL: <https://letsmeet.webex.com/letsmeet/k2/j.php?MTID=tac50c1449d39116a7e9145a8445c412d>
 - Password: PREOE
 - Dial-In Information: 855-829-8848, Conference Code: 738-173-865
- Tentative schedule for future Enrollment Ops Training sessions:
 - Week 2 (September 25th): IC834 201, Recon 101
 - Week 3 (October 2nd): IC834 301, Recon 201
 - Week 4 (October 9th): Recon 301, Disputes 101
 - Week 5 (October 16th): UIR 101, EAPS 101

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, September 18th
- **Plan Year 2016**
 - The RCNI16 submission deadline for this month's 2016 off-cycle Reconciliation process was last Wednesday, September 4th at 3PM EDT
 - Data submitted on the RCNI16 Files was compared to the data extracted from the FFM on August 15th
 - RCNO16 Files from the off-cycle were distributed to participating Issuers on Tuesday, September 10th
 - This 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**
 - This 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**
 - This 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**
 - This 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 next Thursday, September 19th at 3PM EDT
 - **Please note:** Run 10 is the **FINAL** reconciliation cycle prior to Batch Auto-Renewal for PY2020

Early Findings: Reason Codes on RCNI/RCNO

- CMS has performed initial analysis on the Cancellation and Termination Reason Codes submitted in Run 9
- A high percentage of Issuers submitted at least some reason codes on their RCNI Run 9 files; because of this CMS has been able to identify some common issues with these early submissions:
 - On nearly 200k policies, a Cancellation Reason or Termination Reason was provided where none was expected as the policy was not submitted by the Issuer as cancelled or terminated
 - Cancellation and Termination Reasons were submitted by the Issuer that are “owned” by the FFM (such as a voluntary cancel or term) on enrollments where the cancellation or termination was initiated by the Issuer; Issuer-initiated cancellations and terminations should only use codes that align to AMRCs allowed on IC834s
 - Reason codes were submitted with a leading zero (i.e. “06”); no leading zero should be used on these codes

Reason Codes on RCNI/RCNO (cont.)

- **Cancellation Reason Code (Field 62)**
 - Issuers should include a reason code in Field 62 whenever the following conditions are true:
 - The entire policy (as defined by Exchange-Assigned Policy ID) is **cancelled** in the Issuer's enrollment system
 - The Issuer initiated the cancellation of the policy
 - Issuers may also include a Cancellation Reason Code when the cancellation was initiated on the FFM
 - Issuers **should not** populate the Cancellation Reason Code if any of the following is true:
 - The Initial Premium Paid Indicator value submitted is either Y or N
 - There is any period of effectuated coverage associated with that Exchange-Assigned Policy ID
 - The coverage represented by the record is a reinstatement of previously cancelled coverage

Reason Codes on RCNI/RCNO (cont.)

- **Termination Reason Code (Field 63)**
 - Issuers should include a reason code in Field 63 whenever the following conditions are true:
 - The policy (as defined by Exchange-Assigned Policy ID) is **terminated** in the Issuer's enrollment system
 - The Issuer initiated the termination of the policy
 - Issuers may also include a Termination Reason Code when the termination was initiated on the FFM
 - The segment is the **final segment representing effectuated coverage** from the Issuer's perspective
 - Issuers may also include a Termination Reason Code on other segments for the same Exchange-Assigned Policy ID of the termination policy
 - Issuers **should not** populate the Termination Reason Code if any of the following is true:
 - The entire policy is **cancelled** in the Issuer's enrollment system
 - The policy represents active, open-ended coverage (even if this coverage had previously been terminated)

Reason Codes on RCNI/RCNO (cont.)

- RCNI Reason Codes Example
 - Example: John enrolled effective 1/1/2019 and effectuated coverage in QHP A; John updated his financial eligibility leading to a new Applied APTC Amount effective 3/1/2019; John moved and enrolled in QHP B with the same Issuer effective 5/1/2019
 - John did not pay for any coverage after March
 - After honoring the grace period the Issuer terminates John's coverage effective 4/30/2019

Benefit Start Date	Benefit End Date	Applied APTC	QHP ID	Initial Prm Paid Indicator	Cancellation Reason	Termination Reason
1/1/2019	2/28/2019	\$250	QHP A	Y		
3/1/2019	4/30/2019	\$300	QHP A	Y		6
5/1/2019	5/1/2019	\$300	QHP B	C	6	

Reason Codes on RCNI/RCNO (cont.)

- **High-Level Business Rules**

- For the FFM to accept the Issuer value, it must be one of the Issuer-initiated Reason Codes (currently values 6-12 and 14)
 - If the Issuer is extending the end date of a policy previously terminated on the FFM to a later date that is not 12/31, we will accept the FFM-Initiated Reason Codes of 1-5 if the Issuer maintains the existing FFM reason
- In general, the FFM will accept the Issuer value for Cancellation or Termination Reason Code under the following circumstances:
 - The Issuer is sending a new cancellation or termination not yet applied to that policy on the FFM **OR**
 - The Issuer is sending an earlier termination date than currently exists on the FFM **OR**
 - The Issuer is cancelling a previously terminated policy **OR**
 - The Issuer is sending a different Cancellation or Termination Reason Code for a policy that was cancelled or terminated by the Issuer **OR**
 - The issuer is extending a policy end date to a later end date that is not 12/31

AM Approval Deadlines for Prior Year Disputes

- Issuers must request AM approval and wait for a confirmation email from ER&R before submitting a prior year dispute that does not contain a HICS case.
NOTE: The AM approval requirement is waived for 2016 disputes until 12:00 p.m. ET on 09/30/2019.
- The confirmation email from ER&R will include the AM approval deadline for submitting the prior year disputes.
- ER&R will process all prior year disputes that the issuer submits before the deadline provided by the AM.
- If the deadline passes before the issuer submits the disputes to ER&R, the issuer must request AM approval again and should note the reason for the delay in the request.
- If the dispute is rejected before the deadline, the issuer should correct and resubmit the new disputes prior to the AM approval deadline. Issuers must request AM approval again when submitting corrected disputes after the deadline.

Q&A

