

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 9/10 – 9/16 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 Reinstatements – Introduction

- Issuers can use an IC834 to 1) **effectuate** a policy; 2) **terminate** a policy; 3) **cancel** a policy; or 4) **update issuer assigned fields** of a policy (IC834 Maintenance)
- At present, when a policy is cancelled or terminated in the FFM, consumers must perform a change in circumstance (CIC), or Issuers must use the Reconciliation or ER&R process to reactivate coverage for the consumer
- Beginning February 2018, CMS implemented a change to allow issuers to initiate reinstatements through Inbound 834s
 - This gives Issuers the ability to send an IC834 transaction to reactivate a plan that the issuer erroneously cancelled or terminated
- If they haven't already, issuers should start making internal changes to send IC834 reinstatements

IC834 Reinstatements – Transaction Type

- The following code combinations on an IC834 will identify the transaction as ***Reinstatement***

IF Maintenance Type Code (INS03)	AND Maintenance Reason Code (INS04)	AND Additional Maintenance Reason Code (2750 Loop)	THEN Transaction Type (derived by FFM)
025	<i>Null</i>	ISSUER - REINSTATEMENT	REINSTATEMENT

***The IC834 Reinstatement AMRC requires a space before and after the dash. If one or both are excluded, the transaction will be rejected.**

IC834 Reinstatements – Eligible Policies

- A policy can be reinstated via IC834 if the policy is either ***cancelled*** or ***terminated*** in the FFM

		Existing Policy Status in FFM			
		Initial	Effectuated	Terminated	Cancelled
IC834	Reinstatement	Rejected	Rejected	Accepted*	Accepted*

*The IC834 Reinstatement will be successful for policies that were ended by an issuer due to non-payment, HICS, fraudulent activity, reasons of “other,” anti-duplication, free look, and out-of-area as listed in the chart to the right.

MRC (INS04)	AMRC (2750 Loop)
59	TERM
59	CANCEL
Null	TERM-OTH
Null	CANCEL-OTH
26	TERM-HICS
26	CANCEL-HICS
14	CANCEL-FLC
07	TERM-FRD
07	CANCEL-FRD
07	CANCEL-RESCIND
Null	CANCEL-ANTIDUPLICATION
Null	TERM-ANTIDUPLICATION
Null	CANCEL-OUT-OF-AREA

IC834 Reinstatement Exceptions

- In certain scenarios, CMS requests that organizations still utilize the Automated Recon and ER&R process to submit a reinstatement:
 - Policy that has been terminated due to voluntary withdrawal
 - Subscriber who was deemed NLE, but becomes eligible for reinstatement through appeals or HICS
 - Reinstatement of policy from plan year 2017 or earlier
 - Any policy in which the termination or cancellation was not the result of Issuer action (not through IC834)

IC834 Reinstatements – Other Rules

- Inbound Reinstatements will be performed at the *policy level* and require only *subscriber-level* information
 - Member-level reinstatements will not be permitted at this time
- Inbound Reinstatements cannot be used to update coverage start dates
 - Policy start dates are required within the IC834 reinstatement transaction to support FFM policy matching
- PolicyID, SubscriberID, QHP ID, and Policy Start Date on the IC834 must match what is recorded in the FFM for the policy being reinstated
- Inbound Reinstatements will automatically set the end date for the re-activated FFM policy to 12/31
 - If an Issuer wishes to set the end date of the reinstated policy earlier than 12/31, they should wait 24 hours after sending the IC834 reinstatement transaction and then send a separate IC834 termination transaction with the new desired end date < 12/31. This will ensure the transactions are processed in the correct order.

Issuer Enrollment Ops Training for 2020

- CMS has begun its 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
- The series kicked off yesterday, Wednesday, September 18th at Noon EDT and will continue each Wednesday for ***four*** more weeks
- The next session, scheduled for Wednesday, September 25th will cover:
 - IC834 201: Submitting IC834s
 - Recon 101: Pre-Audit and Recon Fundamentals
- 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 3 (October 2nd): IC834 301, Recon 201/301
 - Week 4 (October 9th): Disputes 101
 - Week 5 (October 16th): UIR 101, EAPS 101

Housekeeping: Pre-Audit & Reconciliation

- **Prior Plan Years (2014-2018)**
 - 1095-A Consumer-Initiated Dispute Update (1095Ax) Files were delivered to Issuers yesterday, Wednesday, September 18th
 - The next set of 1095Ax Files are scheduled for distribution to Issuers on Wednesday, October 2nd
- **Plan Year 2016**
 - This month's 2016 FFM extract was taken on Sunday, September 15th at 6PM EDT
 - Incremental Pre-Audit (ISIPA6) Files based upon that extract are scheduled for distribution to Issuers today, Thursday, September 19th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2017**

- This month's 2017 FFM extract was taken on Sunday, September 15th at 6PM EDT
- Incremental Pre-Audit (ISIPA7) Files based upon that extract were delivered to Issuers yesterday, Wednesday, September 18th

- **Plan Year 2018**

- This month's 2018 FFM extract was taken on Sunday, September 15th at 6PM EDT
- Comprehensive Enrollment Pre-Audit (AUD8) Files based upon that extract were delivered to Issuers on Tuesday, September 17th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2019**
 - This month's 2019 FFM extract was taken on Sunday, September 15th at 6PM EDT
 - Comprehensive Enrollment Pre-Audit (AUD9) Files based upon that extract were delivered to Issuers on Tuesday, September 17th
 - The RCNI9 submission deadline for September's Run 10 is **today, September 19th at 3PM EDT**
 - **As of 11AM today, just under 91% of Issuers have successfully submitted for Run 10**
 - **Please note:** Run 10 is the **FINAL** reconciliation cycle prior to Batch Auto-Renewal for PY2020

AM Approval for 2016 Disputes

- Following the 2016 off-cycle RCNO run, issuers may now submit 2016 disputes without AM approval until 3:00 PM ET on October 31st.
 - ER&R extended the deadline for submitting 2016 disputes without AM approval from the previous date of September 30th.
 - For corrections to be included in the October off-cycle run, issuers need to submit disputes on or before September 23rd.
- ER&R will require AM approval for 2016 disputes submitted after 3:00 PM ET on October 31st if the dispute does not include a supporting HICS case.
NOTE: AM approval is never required for disputes that include a supporting HICS case.

BAR First Round Deadline

- The initial round of Batch Auto-Reenrollment (BAR) is approaching.
- UIEs will not BAR due to lack of an FFM record. Issuers should encourage these consumers to enroll during Open Enrollment.
- Issuers must submit Enrollment Disputes by September 23rd for the changes to be present in the first BAR run.
- Incorrect enrollment information during BAR may result in additional discrepancies for issuers to address in 2020.
- Policies that are reinstated after BAR is complete will not be reenrolled, and the consumer will need to complete an enrollment for 2020 coverage.

Q&A

