

Enrollment Reconciliation & IC834 Workgroup



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EAPS Report Updates – Released for October Report Cycle

- Changes noted on following slides
- October EAPS reports are scheduled to be released by COB Wednesday, October 23rd.
- Please contact FMCC@cms.hhs.gov if you have any questions about the EAPS report.

EAPS Report Updates – Aged Initials Cut-Off Date Change

- **Applied to All versions:**
 - Cut-off date used to calculate Aged Initials data this month was 9 am EST on 10/16/2019. Your Aged Initials metric will reflect enrollment updates processed up to that time instead of the standard cut-off time of 6 pm EST the 15th of the month (***this will be reflected in the Period of Performance field in the glossary for this metric***)

Metric	What is it?	Scoring Methodology	Period of Performance
Aged Initials	Description: Measure of how successfully 2019 FFM issuers are resolving or completing their 2019 initial enrollments through either effectuating or cancelling the associated policy. Accommodating for grace periods where consumers are allowed to pay their initial premium, issuers are expected to either effectuate or cancel a policy once 60 days have passed since the benefit coverage start date. Those initial policies that have not been updated are considered "aged initials". Aged Initials Calculation: Numerator = Total Policies with a start date 60 days or more from the period of performance date still in "initial status" Denominator = Total Policies with a start date 60 days or more from the period of performance date Example: Total "Aged" Policies in Initial status = 10 Total "Aged" Policies = 100 Aged Initial Percentage = 10% Summary Score Tab = Overall performance indicator for the current report cycle and a comparison to the prior cycle. Detailed Metric Tab = Includes specific rates, ratios and other key	Summary and Detailed Metric Score: ✓ Green check = Percent of "aged initials" is less than or equal to 0.5% of all policies older than 60 days. ⚠ Yellow exclamation point = Percent of "aged initials" is greater than 0.5% but less than or equal to 1% of all policies older than 60 days ✗ Red X = Percent of "aged initials" is greater than 1% of all policies older than 60 days.	9am EST on 10/16/2019

- **Applied to PY18 Versions ONLY:**
 - All Inbound 834 Update Acceptance Rate metrics are being retired due to the end of inbound 834 processing for 2018 coverage year data. Prior cycle data fields will still be visible in the report but there will no longer be current month data populated. Please refer to the Detailed Metrics tab for historical data ***(change is noted on both the summary score and detailed metrics tab of the report)***

Detailed Metrics Tab

Inbound 834 Update Acceptance Rate – Overall

**PY18 Inbound 834 Processing has ended and this metric no longer has a current month score. Please refer to the Detailed Metrics tab for historical data.*

Inbound 834 Update Acceptance Rate – Overall		Payment Dispute Submission
Sep-19	Oct-19	
✓ 100.0%	Submitted YTD	
Did Not Submit	Submitted YTD	
✓ 100.0%	Submitted YTD	
✓ 80.0%	Submitted YTD	
Did Not Submit	Submitted YTD	
⚠ 66.7%	Submitted YTD	
✓ 100.0%	Submitted YTD	
⚠ 50.0%	Submitted YTD	
Did Not Submit	Submitted YTD	
Did Not Submit	Submitted YTD	
⚠ 62.5%	Submitted YTD	
✓ 100.0%	Submitted YTD	
Did Not Submit	Submitted YTD	

EAPS Report Updates – Change to Persistent ‘I’ Flag Metrics

- Applied to PY19 Versions ONLY:**

- All Persistent “I” flag metrics (Policy Count & Percent of HIOS Policies) for Exchange Assigned Member ID, Exchange Assigned Subscriber ID, and Birth Date have been removed (both current and prior cycle data) to keep this metric aligned with data issuers are able to update through ER&R.

Exchange Assigned Member ID Persistent I Flag Policy Count	Exchange Assigned Member ID Percent of HIOS Policies	Exchange Assigned Subscriber ID Persistent I Flag Policy Count	Exchange Assigned Subscriber ID Percent of HIOS Policies	Birth Date Persistent I Flag Policy Count	Birth Date Percent of HIOS Policies
Sep-19	Sep-19	Sep-19	Sep-19	Sep-19	Sep-19
0	✓ 0.0%	0	✓ 0.0%	4	✓ 0.1%
0	✓ 0.0%	0	✓ 0.0%	0	✓ 0.0%
0	✓ 0.0%	0	✓ 0.0%	0	✓ 0.0%
2	✓ 0.0%	3	✓ 0.0%	5	✓ 0.0%

IC834 – Housekeeping

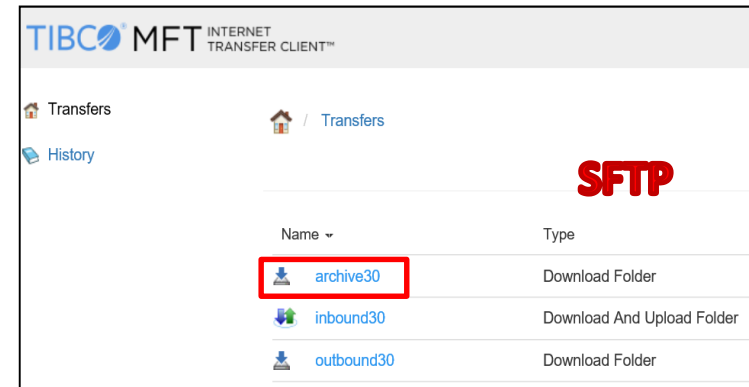
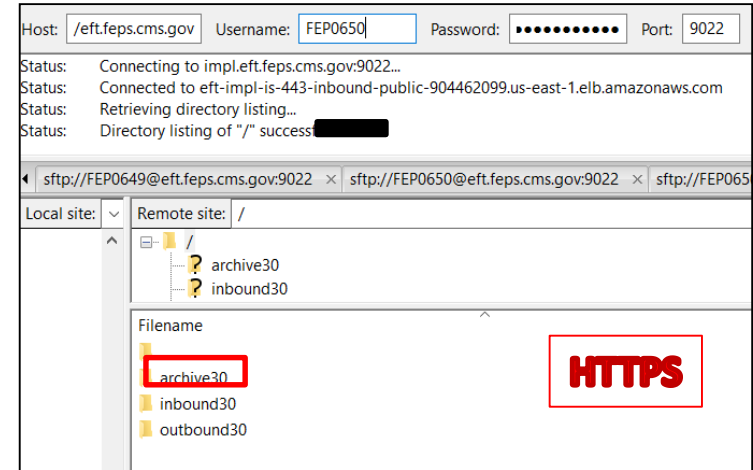
- **The PO-IC834 reporting suite** (PO Summary, PO Detailed, and Reinstatement Detailed) for transactions submitted 10/8 – 10/14 were sent out yesterday.
- If you have any questions about either of these items or any other IC834-related item, please contact Inbound834@bah.com

IC834 –Tips Ahead of Open Enrollment

- **Update system for new Plan Year:** Before the onset of Open Enrollment, Issuers should ensure systems are updated to include the new Plan Year (i.e. 2020)
- **Submit timely and accurate transactions:** CMS expects Issuers to submit timely and accurate transactions via IC834
 - Effectuations are expected within 3 days after receiving premium payment
 - Cancellations should take eligible grace periods into account (varies by state)
- **Avoid rejections:** Issuers should be mindful to avoid rejections due to the following:
 - **Policy mismatches** due to invalid field values on the IC834 for a subset of mandatory elements used to identify the associated FFM policy (Issuers will receive an E093 BAA error)
 - **Including enrollment start and end dates that cut across multiple plan years** (the Marketplace maintains policies within a single calendar year)
 - Transactions sent with **invalid maintenance reason codes**; ensure the maintenance code combination reflects the desired change
 - Successful IC834 transactions result in an update to the FFM without any manual review for validity of the information sent, so it is critical that the maintenance codes reflect the intended transaction type

EFT Archive Folder

- Partners can access the EFT Archive Folder via **HTTPS** or **SFTP**
 - HTTPS Access:**
 - PROD:** <https://eft.feps.cms.gov:443>
 - IMPL:** <https://impl.eft.feps.cms.gov:443>
 - SFTP Access:**
 - PROD:** [impl.eft.feps.cms.gov:9022](sftp://impl.eft.feps.cms.gov:9022)
 - IMPL:** [eft.feps.cms.gov:9022](sftp://eft.feps.cms.gov:9022)
 - Folder Paths:**
 - Archive Folder: **/archive30**
 - Outbound Folder for receiving files: **/outbound30**
 - Inbound Folder for sending files: **/inbound30**
- EFT Archived files will be accessible for 90 days after initial delivery
- EFT Archive is arranged by month/date the file was sent (not necessarily according to the DATE and TIME stamps in the filename)
- PUSH/PULL partners will both need to PULL files from Archive folder to receive files



Issuer Enrollment Ops Training for 2020

- CMS is currently conducting 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 on Wednesday, September 18th at Noon EDT and will conclude next week, Wednesday, October 23rd
- Next week's final session (Wednesday, October 23rd) will cover:
 - Recon 301: Recon Processing, RCNO Files, and Statistical Analysis
- 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
- Prior session materials available on zONE at:
 - <https://zone.cms.gov//document/2019-open-enrollment-ops-training-series>

Housekeeping: Pre-Audit & Reconciliation

- **Prior Plan Years (2014-2018)**
 - 1095-A Consumer-Initiated Dispute Update (1095Ax) Files will be distributed to Issuers later today, Thursday, October 17th
 - The next set of 1095Ax Files is scheduled for distribution to Issuers on Wednesday, October 30th
- **Plan Year 2016**
 - This month's 2016 FFM extract was taken on Tuesday, October 15th at 6PM EDT
 - Comprehensive Enrollment Pre-Audit (AUD16) Files based upon that extract are scheduled for distribution to Issuers on Monday, October 21st
 - The RCNI16 submission deadline for the final scheduled 2016 off-cycle run is **Wednesday, October 30th at 3PM EDT**
 - Issuers can submit RCNI16 files for the off-cycle at any time until the deadline
 - RCNI data submitted in the off-cycle will be compared against the FFM extract taken on October 15th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2017**

- This month's 2017 FFM extract was taken on Tuesday, October 15th at 6PM EDT
- Incremental Pre-Audit (ISIPA7) Files based upon that extract are scheduled for distribution to Issuers tomorrow, Friday, October 18th

- **Plan Year 2018**

- This month's 2018 FFM extract was taken on Tuesday, October 15th at 6PM EDT
- Incremental Pre-Audit (ISIPA8) Files based upon that extract will be delivered to Issuers later today, Thursday, October 17th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2019**
 - This month's 2019 FFM extract was taken on Tuesday, October 15th at 6PM EDT
 - Comprehensive Enrollment Pre-Audit (AUD9) Files based upon that extract are scheduled for distribution to Issuers later today, Thursday, October 17th
 - The RCNI9 submission deadline for October's Run 11 is next Thursday, October 24th at 3PM EDT

Important Dates: Reason Codes on RCNI

- As previously communicated, CMS intends to require population of Cancellation and Termination Reason Codes on the RCNI File starting with November's Run 12
 - Issuers that do not submit reason codes on cancelled or terminated records may have those cancellations and terminations suppressed starting with that cycle
- CMS plans to continue analysis of the reason codes submitted by Issuers on the RCNI File to ensure sufficient data quality to apply updates to FFM data
 - CMS is currently targeting the **March 2020 cycle for PY2020** to begin applying reason codes to the FFM based upon Issuer-submitted data on the RCNI File

Deep Dive: Proper Use of Cancellation Reasons on RCNI

- CMS has been performing detailed analysis of the Cancellation and Termination Reason Codes submitted by Issuers on RCNI in September's Run 10
 - Last Thursday's webinar featured a discussion regarding proper use of Termination Reason Codes on the RCNI File
- Another common issue seen thus far has been the incorrect inclusion of Cancellation Reasons in the RCNI File; this has been observed in the following scenarios:
 - Policies that have been terminated (rather than cancelled)
 - Policies that have been terminated and have segments that reflect no coverage
- **Reminder:** Issuers will be required to submit Cancellation and Termination Reason Codes on the appropriate RCNI records starting with November's Run 12
 - Issuers that have not yet begun to submit the reason codes are encouraged to do so as soon as possible to identify and resolve any issues as quickly as possible

Proper Use of Cancellation Reason Codes

- **Scenario:** Policies that have been terminated rather than cancelled
 - Example: Jose enrolls effective 1/1/2019 and makes binder payment
 - Jose makes no payment for coverage after April and following the grace period is terminated effective 5/31/2019

Member	Benefit Start Date	Benefit End Date	Exchange-Assigned Policy ID	Applied APTC Amount	Initial Prm Paid Indicator	Cancellation Reason	Termination Reason
Jose	1/1/2019	5/31/2019	62343	\$200	Y	6	6

- Observations and Recommendations
 - Some Issuers appear to be submitting Cancellation Reason codes for any cancellation or termination of coverage
 - **Cancellations indicate there is no period of active coverage associated with the policy**
 - It is important that Issuers distinguish between cancellation and terminations and populate the appropriate field on the RCNI File
 - A termination cannot be applied if the reason code is submitted in the Cancellation Reason field

Proper Use of Cancellation Reason Codes

- **Scenario:** Policies that have been terminated and have segments that reflect no coverage
- Example: Amy enrolls effective 1/1/2019 and makes binder payment
 - Amy loses APTC due to an eligibility issue effective 4/1/2019
 - Amy does not make payment for coverage after February and is terminated back to 3/31/2019

Member	Benefit Start Date	Benefit End Date	Exchange- Assigned Policy ID	Applied APTC Amount	Initial Prm Paid Indicator	Cancellation Reason	Termination Reason
Amy	1/1/2019	3/31/2019	77329	\$500	Y		6
Amy	4/1/2019	4/1/2019	77329	\$0	C	6	

- Observations and Recommendations
 - **Cancellations indicate there is no period of active coverage associated with the policy**
 - Even if a specific segment is submitted with an Initial Premium Paid Indicator value of **C**, if there is other active coverage represented within the policy it is **not a cancellation**
 - In these cases, only the Termination Reason should be populated
 - Some Issuers appear to be submitting both the Cancellation and Termination Reasons in these scenarios
 - Only one of the Cancellation Reason **or** Termination Reason should ever be populated for a single policy

Enrollment Dispute Form v12 Launch Date

- ER&R has completed the final production version of Enrollment Dispute Form v12 and posted the file enrollmentdisputeformv12.xlsx to zONE.
 - <https://zone.cms.gov/document/enrollment-resolution-and-reconciliation>
- **ER&R will accept v11 through Friday, November 8th.**
 - Issuers who submit disputes on v11 after the 8th will receive response emails that include a copy of v12 and instructions to resubmit the disputes using the new form.
- **ER&R will begin accepting v12 on Tuesday, November 12th.**
 - While issuers may submit v12 starting on November 12th, be aware that ER&R will be completing deployment and testing for several days. Issuers may not receive timely acknowledgement of disputes submitted from November 12th–14th.
- **ER&R anticipates returning to normal cadence by Friday, November 15th.**
 - All new disputes and disputes received since November 12th will receive responses and be processed normally by Friday, November 15th.
- Issuers should delete the prototype form (20190619enrollmentdisputeformv122.xlsx) that was previously available on zONE.
- Issuers who utilize add-ins will need to install the v12-compatible add-ins, which will be posted to zONE in advance of the launch date.

Enrollment Dispute Form v12 Launch Date (Continued)

- As a reminder, Enrollment Dispute Form v12 includes the following enhancements:
 - Addition of Date of Birth discrepancy dispute type
 - Replacement of FFM Benefit Start Date and FFM Benefit End Date columns with Segment ID column
 - Addition of FFM Exchange Assigned Member ID column for member-level disputes
 - Elimination of Batch Number column
 - Formatting changes for 508 compliance
 - Other minor fixes and improvements
- Issuers may direct questions regarding the v12 form or add-ins to the ER&R Support Center.
 - ERRSupportCenter@cognosante.com
 - **(855) 591-7113**

zONE Publications

- ER&R released UIR TRG v7.0 and UIR Master Guidance, which contain updated information regarding the UIR function code used for UIR Reports.
- ER&R released the Disposition and Detail Code List v24, which contains new and modified detail codes used for payment disputes.
- Access the updated documentation on CMS zONE at <https://zone.cms.gov/document/enrollment-resolution-and-reconciliation>.

Q&A

