

Enrollment Reconciliation & IC834 Workgroup



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October 31, 2019

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IC834 – Housekeeping

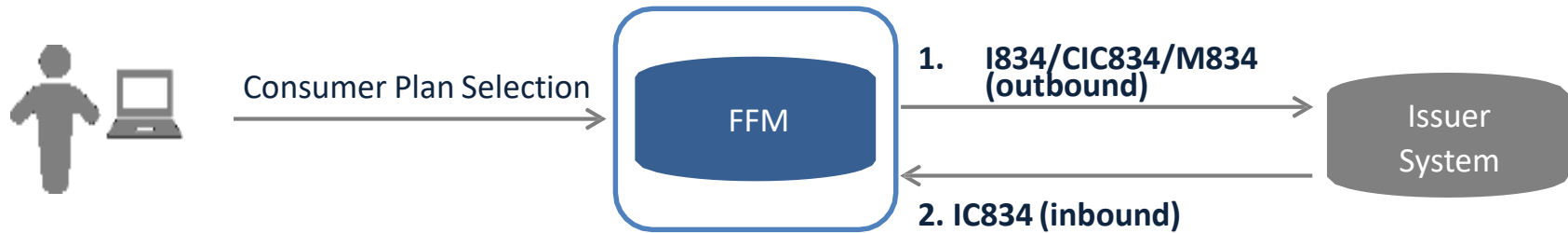
- **The PO-IC834 reporting suite** (PO Summary, PO Detailed, and Reinstatement Detailed) for transactions submitted 10/22 – 10/28 ***was delayed; reports were sent out this morning, Thursday, October 31.***
- **Reminder:** if you would like to make changes to the points of contact for our distribution list, please send the IC834 team an e-mail at Inbound834@bah.com
- If you have any questions about reporting or any other IC834-related item, please contact Inbound834@bah.com

IC834 Processing – 11/1 – 11/4

- To accommodate the beginning of Open Enrollment, from Friday, November 1 through Monday, November 4, IC834 processing will be on hold.
- Issuers can continue to submit IC834 files during the downtime and can expect to receive X12 functional acknowledgements in the form of TA1/999. Additionally, issuers can expect to receive BAAs for files submitted prior to the beginning of the downtime.
- However, issuers will not receive BAAs for transactions submitted and received during the downtime. Issuers can expect to receive these BAAs once IC834 processing is up and running again.
- As a result of the downtime, the PO Report Suite scheduled to be delivered on Wednesday, November 6 will likely be delayed. Further downtime and/or impacts to PO reports will be communicated to issuers through both the Thursday Workgroup meetings and CMS issuer communication blasts.

Overview of IC834 Processing

Inbound 834 (IC834) allows Issuers to respond to and provide updates related to enrollment activity in the Marketplace.



1. **The Initial 834 (I834) transaction is the first outbound transaction from the FFM to an Issuer:**
 - ASC X12 document that communicates consumer enrollment in Marketplace coverage
 - Issuers will also receive a CIC834 or M834 transaction (follow up outbound transactions) from the FFM to the Issuer if a policy is updated or if there is a change in policy
 - The FFM will also use I834 transactions to communicate cancellation or termination of a policy
2. **Inbound 834 (IC834) transactions provide the response to the initial enrollment from the Marketplace:**
 - ASC X12 document that communicates policy status and related information from the issuer system
 - Issuers should use IC834 to report effectuation of the policy once binder payment has been made, or cancellation if the binder payment is not made and coverage is cancelled
 - Issuers can later use IC834 to communicate termination of the policy, reinstate a cancelled policy, or provide maintenance updates to Issuer-Assigned IDs

Creating IC834 X12 Files

Effectuation Transactions (1/2)

LEGEND
 Update/Edit
 Add
 Remove

FFM Outbound CIC834

Issuer Outbound Effectuation IC834

ISA*00* *00* *ZZ*CMSFFM *ZZ*D100000001 *150825*1030*^00501*000000148*1*T*~ GS*BE*MI0*12345MI0112012*20150825*1030*227*X*005010X220A1~ ST*834*1111111*005010X220A1~ BGN*00*1111111*20150825*103038*ET***2~ QTY*TO*2~ QTY*DT*1~ N1*P5*John*FI*123456789~ N1*IN*ABC issuer*FI*987654321~ INS*Y*18*021*EC*A***AC~ REF*OF*1234567890~ REF*17*1234567890~ REF*6O*MI10000098002~ ... DTP*348*D8*20150901~ REF*1L*12345678~ REF*CE*12345MI011201201~ LS*2700~ LX*1 N1*75*ADDL MAINT REASON~ REF*17*CIC~ DTP*007*D8*20150901~ ... LX*10~ N1*75*RATING AREA~ REF*9X*R-MI001~ DTP*007*D8*20150901~ LE*2700~ INS*N*01*021*EC*A~ REF*OF*1234567890~ REF*17*1234567891~ DTP*356*D8*20150901~ ... REF*CE*12345MI011201201~	Swap ISA06 & ISA08 Swap GS02 & GS03 Change INS04 Add REF*ZZ (Issuer Assigned Subscriber Id) and REF*23 (Issuer Assigned Member Id) Add DTP*543 (Last Premium Paid Date) Add REF*X9 (Issuer Assigned Policy Id) Change ADDL MAINT REASON Value for the Subscriber Change INS04 Add REF*23 & REF*ZZ for dependents	ISA*00* *00* *ZZ*D100000001 *ZZ*CMSFFM *150825*1035*^00501*000000149*1*T*~ GS*BE*12345MI0112012*MI0*20150825*1035*228*X*005010X220A1~ ST*834*1111112*005010X220A1~ BGN*00*1111112*20150825*103538*ET***2~ QTY*TO*2~ QTY*DT*1~ N1*P5*John*FI*123456789~ N1*IN*ABC issuer*FI*987654321~ INS*Y*18*021*28*A***AC~ REF*OF*1234567890~ REF*17*1234567890~ REF*ZZ*2234567890~ REF*23*2234567890~ REF*6O*MI10000098002~ ... DTP*348*D8*20150901~ DTP*343*D8*20150930~ DTP*543*D8*20150825~ REF*1L*12345678~ REF*CE*12345MI011201201~ REF*X9*12345673~ LS*2700~ LX*1 N1*75*ADDL MAINT REASON~ REF*17*CONFIRM~ DTP*007*D8*20150901~ ... LX*10~ N1*75*RATING AREA~ REF*9X*R-MI001~ DTP*007*D8*20150901~ LE*2700~ INS*N*01*021*28*A~ REF*OF*1234567890~ REF*17*1234567891~ REF*23*2234567891~ REF*ZZ*2234567890~ DTP*356*D8*20150901~ ... REF*CE*12345MI011201201~
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Creating IC834 X12 Files

Effectuation Transaction (2/2)

LEGEND

Update/Edit

Add

Remove

FFM Outbound CIC834

Issuer Outbound Effectuation IC834

LS*2700~ LX*1~ N1*75*SOURCE EXCHANGE ID~ REF*17*MIO~ DTP*007*DB*20140121~ LX2~ N1*75*ADDL MAINT REASON~ REF*17*CIC~ DTP*007*DB*20150901~ --- LX*5~ N1*75*APPLICATION ID AND ORIGIN REF*6M*378492756-1 DTP*007*DB*20150901 LE*2700~ SE*96*11111111~ GE*1*227~ IEA*1*000000148~	Add REF*X9 for dependents Change ADDL MAINT REASON Value for the Dependents	REF*X9*12345673~ LS*2700~ LX*1~ N1*75*SOURCE EXCHANGE ID~ REF*17*MIO~ DTP*007*DB*20140121~ LX*2~ N1*75*ADDL MAINT REASON~ REF*17*CONFIRM~ DTP*007*DB*20150901~ --- LX*5~ N1*75*APPLICATION ID AND ORIGIN REF*6M*378492756-1 DTP*007*DB*20150901 LE*2700~ SE*106*11111112~ GE*1*228~ IEA*1*000000149~
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Note: This example is condensed and simplified to display pertinent information

Issuer Enrollment Ops Training for 2020

- CMS conducted 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
- The series kicked off on Wednesday, September 18th at Noon EDT and concluded last Wednesday, October 23rd
- Topics covered during the series included:
 - Week 1 (September 18th) Data Alignment 101, Introduction to IC834
 - Week 2 (September 25th): IC834 201, Recon 101
 - Week 3 (October 2nd): IC834 301, Recon 201
 - Week 4 (October 9th): Disputes 101
 - Week 5 (October 16th): UIR 101, EAPS 101
 - Week 6 (October 23rd): Recon 301: Recon Processing, RCNO Files, and Statistical Analysis
- Session materials are 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 were distributed to Issuers yesterday, Wednesday, October 30th
 - The next set of 1095Ax Files is scheduled for distribution to Issuers on Thursday, November 14th
- **Plan Year 2016**
 - The RCNI16 submission deadline for the final scheduled 2016 off-cycle run was yesterday, Wednesday, October 30th at 3PM EDT
 - RCNI data submitted in the off-cycle will be compared against the FFM extract taken on October 15th
 - RCNO16 Files are scheduled for distribution to participating Issuers next Wednesday, November 6th
 - Next month's 2016 FFM extract is scheduled for Friday, November 15th at 6PM EST
 - Incremental Pre-Audit (ISIPA6) Files based upon that extract are scheduled for delivery to Issuers on Thursday, November 21st

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2017**

- Next month's 2017 FFM extract is scheduled for Friday, November 15th at 6PM EST
- Incremental Pre-Audit (ISIPA7) Files based upon that extract are scheduled for delivery to Issuers on Wednesday, November 20th

- **Plan Year 2018**

- Next month's 2018 FFM extract is scheduled for Friday, November 15th at 6PM EST
- Incremental Pre-Audit (ISIPA8) Files based upon that extract are scheduled for delivery to Issuers on Tuesday, November 19th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2019**

- The RCNI9 submission deadline for October's Run 11 was last Thursday, October 24th at 3PM EDT
 - RCNO9 Files were distributed to Issuers on Tuesday, October 29th
- Next month's 2019 FFM extract is scheduled for Friday, November 15th at 6PM EST
- Comprehensive Enrollment Pre-Audit (AUD9) Files based upon that extract are scheduled for delivery to Issuers on Tuesday, November 19th
- The RCNI9 submission deadline for November's Run 12 is **Tuesday, November 19th at 3PM EST**
 - **Please Note:** The deadline is on Tuesday rather than the typical Thursday to accommodate processing prior to the Thanksgiving holiday

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2020**
 - The first set of Missing Outbound 834 Incremental Pre-Audit (MOIPA0) Files is scheduled for delivery to impacted Issuers on Tuesday, November 5th
 - The first 2020 FFM Extract is scheduled for Wednesday, November 13th at 6PM EST
 - The first comprehensive 2020 Enrollment Pre-Audit (AUD0) Files are scheduled for delivery to Issuers on Friday, November 15th

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
 - In Run 11, **70.2%** of FFM Issuers submitted at least one Cancel Reason Code on the RCNI File; **66.2%** of Issuers submitted at least one Termination Reason Code
- 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
- Issuers are encouraged to review the deep dive educational materials on proper use of the new reason code fields shared on the October 10th and 17th Recon/IC834 Workgroup calls, available on zONE at:
 - <https://zone.cms.gov//document/enrollment-reconciliation-and-ic834-workgroup-call-content>

Reminder: AM Approval for 2016 Disputes

- As announced on the September 19th Recon call, issuers may submit 2016 disputes without AM approval until 3:00 PM ET on October 31st.
 - This is an extension of the previous deadline of September 30th.
- 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.

Refresher: Avoiding Disposition Code FR7

- ER&R assigns FR7 disposition codes to Total Premium Amount that require a HICS Case but no HICS Case ID was included or the HICS Case identified does not support the requested change.

NOTE: If the HICS case provided does not support the Total Premium Amount change because the change should be addressed through a date change, the dispute will be assigned an FR49 disposition code.

- Not all Total Premium Amount disputes require a supporting HICS case. Issuers can access a list of exceptions on zONE in the Combined Enrollment and Payment TRG, Disputes 101, and HICS Direct Disputes Master Guidance.
 - **Verbiage Returned to Issuer:** *ER&R is not able to accept the update requested. Either the subscriber information provided by the issuer is not associated with the HICS case, the HICS case provided is invalid, or the HICS case does not support the change requested. ER&R must use the Total Premium Amount in the HICS case; therefore, the Total Premium Amount was not changed in the FFM. The issuer needs to provide a valid HICS case and ensure the subscriber ID provided is associated to the application/HICS case on the dispute form or update their records to match the Total Premium Amount in the FFM, provided on the RCNO file.*

Update: 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 process v11 disputes through Monday, November 11th.**
 - Issuers must submit v11 disputes by November 11th, as ER&R will not accept any v11 disputes after that date.
- **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.

Reminder: 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**

Q&A

