

Enrollment Reconciliation & IC834 Workgroup

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November 7, 2019

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IC834 – Housekeeping

- **The PO-IC834 reporting suite** (PO Summary, PO Detailed, and Reinstatement Detailed) for transactions submitted 10/29 – 11/4 was delivered this morning.
- If you have any questions about these reports or any other IC834-related item, please contact Inbound834@bah.com

Reminder - IC834 Processing – 11/1 – 11/4

- To accommodate the beginning of Open Enrollment, from Friday, November 1 through Monday, November 4, IC834 processing was on hold.
- Issuers should have received X12 functional acknowledgements in the form of TA1/999 for any transactions submitted during the processing hold. Issuers would not have received BAAs for transactions submitted and received during the downtime. However, issuers should have received these BAAs once IC834 processing resumed.

IC834 – Open Enrollment 2020

- The Inbound FFM Individual Market is accepting IC834 submissions for 2020 policies
- Issuers should ensure that their systems are set up to include the 2020 coverage year on 834 submissions
- Should an Issuer need to apply changes for 2019, they may continue to leverage the IC834 process
 - Issuers are expected to send as many updates through IC834 as possible to apply updates in a timely and efficient manner
 - This supports data synchronization in the Marketplace

Reminder – Submit IC834s by the 13th for Pre-Audit Inclusion

- As a reminder, we encourage issuers to submit IC834 transactions by the end of the day on November 13th (as possible given business constraints).
- Since the Pre-Audit file runs on the 15th, submitting by the 13th provides sufficient time for processing between submission and when the Pre-Audit file is run. This helps ensure these transactions are reflected on the monthly Pre-Audit files.

Housekeeping: Pre-Audit & Reconciliation

- **Prior Plan Years (2014-2018)**
 - 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 Wednesday, October 30th at 3PM EDT
 - RCNI data submitted in the off-cycle was compared against the FFM extract taken on October 15th
 - RCNO16 Files were delivered to participating Issuers yesterday, 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**

- 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 were delivered 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 requires 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>

Issue Identified with Issuer Submitted Termination Reason Codes

- CMS has been analyzing the data submitted by Issuers that are already populating the Cancellation and Termination Reason Codes on their RCNI Files
- We have identified an issue where the policy is terminated and has an FFM-initiated Termination Reason Code, however the Issuer is sending a different Termination Reason Code on their RCNI file
 - Issuers may echo back Termination Reason Codes for terminations initiated on the FFM side, but Issuers may not change the Termination Reason Code generated by the FFM unless changing the end date of the termination
- Example: A member enrolls for coverage effective January 1st and then elects to voluntarily terminate coverage on healthcare.gov effective 3/31
 - Pre-Audit (and RCNO) files reflect Benefit Start Date 1/1, Benefit End Date 3/31, and Termination Reason Code 1 (Voluntary Withdrawal)
 - Issuer sends a different Termination Reason Code on their RCNI file such as 6 (Non-Payment)
 - This will cause the reason code to be rejected and may result in suppression of other potential field-level updates to the record through automated recon

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 Monday, November 11th.**
 - Issuers who submit disputes on v11 after the 11th 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.
 - Disputes submitted using the prototype form will not be accepted.

Enrollment Dispute Form v12: Add-ins

- Issuers who wish to use add-ins when submitting disputes must download and install the new v12 add-ins file.
- The v12 add-ins will be available on zONE in the near future.
- Instructions for installing and using the add-ins are provided on the PSV Format tab of the Enrollment Dispute Form; however, issuers should contact their IT department before installing the add-ins.
 - Prior to installing the new version of the add-ins, issuers should uninstall any previous version.
- Issuers may direct questions regarding the v12 form or add-ins to the ER&R Support Center.
 - ERRSupportCenter@Cognosante.com
 - **(855) 591-7113**

Enrollment Dispute Form v12: Improvements

- Improvements to the new version of the form include:
 - Addition of Date of Birth (DOB) member-level dispute type on the Discrepancy Dispute tab
 - Addition of the Segment ID column, to be used for prior year disputes
 - Addition of the FFM Exchange Assigned Member ID column, to be used for the following member-level Discrepancy Dispute types:
 - Gender
 - Tobacco Status
 - All issuer-assigned IDs
 - DOB
 - Elimination of Batch Number column
 - Elimination of FFM Benefit Start Date and FFM Benefit End Date columns
 - NOTE:** With the addition of the Segment ID column, it is no longer necessary for issuers to provide the FFM Benefit Start and End Dates.
 - Reordering of columns
 - New pipe-delimited file formats
 - Pipe-delimited formats now include version number and tab name
 - Field order now mirrors Excel format
 - Formatting changes for 508 compliance

Enrollment Dispute Form v12: Segment ID and FFM Exchange Member ID

- Based on issuer requests, ER&R added the Segment ID column to replace the FFM Benefit Start Date and FFM Benefit End Date columns.
 - On prior year disputes, issuers have the option to fill out both the FFM Exchange Assigned Policy ID and Segment ID fields instead of the FFM Internal Record Inventory Number field.
 - This change will allow issuers to submit prior year disputes based on the FFM Pre-Audit file and eliminate the need to refer back to prior year RCNO data.

NOTE: The Segment ID is always optional for current year disputes.

- The FFM Exchange Member ID column was also added to the Discrepancy Dispute tab and will be required for all member-level dispute types that do not have an FFM Internal Record Inventory Number.

NOTE: Member-level dispute types include DOB, Gender, Tobacco Status, Issuer Assigned Member ID, Issuer Assigned Policy ID, and Issuer Assigned Subscriber ID.

Enrollment Dispute Form v12: Date of Birth Disputes

- DOB is a new option in the Description of Disputed Item drop-down menu of the Discrepancy Dispute tab.
- Some DOB disputes may require a correction to the Total Premium Amount. In these scenarios, the issuer should include the new premium in the Comments field.

Description of Disputed Item	Issuer Value	FFM Value	HICS Case ID	Issuer Assigned Dispute Control Number	Comments
Date of Birth	19901010	19991010			New Premium: 800.00

- ER&R will assign a successful DOB dispute a BU106 or BU107 disposition code.
- BU106 indicates that the DOB correction was processed.
 - **Verbiage Returned to Issuer:** *ER&R has submitted updates to the FFM to correct the Date of Birth (DOB) for the disputed member. Please allow 1–2 monthly Reconciliation cycles from the date of ER&R resolution for the FFM and payments (if applicable) to be updated accordingly. Please ensure the RCNI also reflects the correct DOB.*
- BU107 indicates that the DOB and Total Premium Amount corrections were processed.
 - **Verbiage Returned to Issuer:** *ER&R has submitted updates to the FFM to correct the Date of Birth (DOB) for the disputed member. Additionally, ER&R has submitted a correction for the Total Premium Amount for the disputed policy as requested by the issuer. Please allow 1–2 monthly Reconciliation cycles from the date of ER&R resolution for the FFM and payments (if applicable) to be updated accordingly. Please ensure the RCNI also reflects the correct DOB.*

Enrollment Dispute Form v12: Date of Birth Disputes (Continued)

- DOB disputes are allowed for all coverage years.
- The DOB dispute type is a member-level dispute, and the FFM Exchange Assigned Member ID is required if the FFM Internal Record Inventory Number is not provided.
- DOB disputes do not require a HICS case; however, if a HICS case is not provided, ER&R must perform manual research and find evidence of the correct DOB within the FFM to make the correction.
- ER&R will assign a DR45 disposition code when a HICS case was not provided and there is no supporting evidence for a DOB change.
- Upon receiving a DR45 disposition code, issuers should advise the consumers to contact the Marketplace to initiate the DOB change.
 - **Verbiage Returned to Issuer:** *ER&R is unable to apply the requested Date of Birth (DOB) correction. The issuer did not provide a HICS case, and ER&R was unable to locate evidence of a Date of Birth change in the FFM. To resolve this discrepancy, the consumer will need to confirm the DOB change via the Marketplace.*

Enrollment Dispute Form v12: Discrepancy Dispute Tab

- Discrepancy Dispute tab changes:
 - Removed Batch Number column
 - Added Segment ID column
 - Added FFM Exchange Assigned Member ID column

Discrepancy Dispute												
Point of Contact Name				Use the Discrepancy Dispute tab when the FFM values from the RCNO do not match the issuer's records. A Discrepancy Dispute can be submitted for a policy relating to the subscriber. Changes apply to the entire enrollment group. NOTE: The Description of Disputed Item field (column I) must contain a value selected from the drop-down menu. Custom entries will not be accepted.								
Telephone Number												
Email Address												
Contact the ER&R Support Center for assistance using this form: 1-855-591-7113 or ERRSupportCenter@cognosante.com				Additional information is available on zC https://zone.cms.gov/document/enrollment-resolution-and-reconciliation								
Required	Required	Required for prior year disputes if FFM Exchange Assigned Policy ID in column E and Segment ID in column F are not provided	Required for prior year disputes if FFM Internal Record Inventory Number is not provided in column D	Required for prior year disputes if FFM Internal Record Inventory Number is not provided in column D	Required	Required for prior year disputes when using Segment ID for Date of Birth, Gender, Tobacco Status, and all Issuer Assigned ID dispute types	Required	Required	Required	Required for Applied APTC Amount, QHP ID, and Total Premium Amount* disputes	Optional	NOTE: If the dispute type is Date of Birth and there is an associated Total Premium Amount change, enter the new Total Premium Amount in the Comments field.
		Required for current year disputes	Optional for current year disputes	Optional for current year disputes		Optional for current year disputes				*See Dispute Examples tab for information on Total Premium Amount disputes that do not require HICS cases		Optional
HIOS	Coverage Year	FFM Internal Record Inventory Number	FFM Exchange Assigned Policy ID	Segment ID	FFM Exchange Assigned Subscriber Identifier	FFM Exchange Assigned Member ID	Description of Disputed Item	Issuer Value	FFM Value	HICS Case ID	Issuer Assigned Dispute Control Number	Comments

- Segment ID should only be used for prior year disputes. Issuers may populate the FFM Internal Record Inventory Number field instead of the Segment ID field for prior year disputes.
- The FFM Exchange Assigned Member ID is required for member-level disputes when the FFM Internal Record Inventory Number is not provided, even if the dispute is for the subscriber.

Enrollment Dispute Form v12: Rejected Enrollments Tab

- Rejected Enrollments tab changes:
 - Removed Batch Number column
 - Updated information section
 - Other general improvements

Rejected Enrollments

Point of Contact Name			Use the Rejected Enrollments tab to report member records that should be cancelled. Rejected Enrollments can be policies that should not have passively reenrolled, duplicate policies, "leftover" policies, or policies for which there was not coverage for that time period. Rejected Enrollments can only be submitted for policies during the current RCNO year. For prior year cancellations, use the Initial Premium Paid Status dispute type on the Discrepancy Dispute tab. NOTE: Using this form will cancel the entire policy. To cancel an individual coverage span, use the Initial Premium Paid Status dispute type on the Discrepancy Dispute tab and submit the Issuer Value of "C". Additional information is available on zONE: https://zone.cms.gov/document/enrollment-resolution-and-reconciliation		
Telephone Number					
Email Address					
Contact the ER&R Support Center for assistance using this form: 1-855-591-7113 or ERRSupportCenter@cognosante.com					
Required	Required	Required if FFM Exchange Assigned Policy ID is not provided in column E	Required if FFM Internal Record Inventory Number is not provided in column D	Required	Optional
HIOS	Coverage Year	FFM Internal Record Inventory Number	FFM Exchange Assigned Policy ID	FFM Exchange Assigned Subscriber Identifier	Issuer Assigned Dispute Control Number

- The Segment ID column was not added to the Rejected Enrollments tab. Rejected Enrollment disputes will continue to be available for current year only.

Enrollment Dispute Form v12:

Reinstatement End Date 12.31 Tab

- Reinstatement End Date 12.31 tab changes:
 - Removed Batch Number column
 - Removed FFM Benefit Start Date and FFM Benefit End Date columns
 - Added Segment ID column
 - Added HICS Case ID column

Reinstatement End Date 12.31

Point of Contact Name			Use the Reinstatement End Date 12.31 tab to report member records that the issuer would like to reinstate to reflect the FFM Benefit End Date as December 31. Reinstatements can be submitted for any coverage year. If a policy needs to be reinstated to a date other than December 31, use the applicable option on the Discrepancy Dispute tab; to change the FFM end date on a prior coverage year policy, use <i>Prior Year – End Date</i> , and for current coverage year policies, use <i>Issuer End Date Later Than FFM</i> to change the end date to a later date or <i>Issuer End Date Earlier Than FFM</i> to change the end date to an earlier date. NOTE: By submitting a policy as a Reinstatement End Date 12.31, the issuer is indicating that the EOY Termination Indicator should be "N" or blank. Additional information is available on zONE: https://zone.cms.gov/document/enrollment-resolution-and-reconciliation				
Telephone Number							
Email Address							
Contact the ER&R Support Center for assistance using this form: 1-855-591-7113 or ERRSupportCenter@cognosante.com							
Required	Required	Required for prior year disputes if FFM Exchange Assigned Policy ID in column E and Segment ID in column F are not provided	Required for prior year disputes if FFM Internal Record Inventory Number is not provided in column D	Required for prior year disputes if FFM Internal Record Inventory Number is not provided in column D	Required	Optional	Optional
		Required for current year disputes	Optional for current year disputes	Optional for current year disputes			
HIOS	Coverage Year	FFM Internal Record Inventory Number	FFM Exchange Assigned Policy ID	Segment ID	FFM Exchange Assigned Subscriber Identifier	HICS Case ID	Issuer Assigned Dispute Control Number

- Segment ID should only be used for prior year disputes. Issuers may populate the FFM Internal Record Inventory Number field instead of the Segment ID field for prior year disputes.

Enrollment Dispute Form v12: Newborn Premium Updates Tab

- Newborn Premium Updates tab changes:
 - Removed Batch Number column
 - Removed FFM Benefit Start Date and FFM Benefit End Date columns
 - Added Segment ID column
 - Added HICS Case ID column

Newborn Premium Updates

Point of Contact Name			Use the Newborn Premium Updates tab to report newborn member records that qualify for a free premium coverage period in accordance with state laws. Newborn Premium Updates are policies that currently reflect an individual premium amount for a period of time, when the state law indicates the newborn should not have a premium rate for the first month or two.							
Telephone Number			NOTE: Issuers may not submit Newborn Premium Updates for newborns who have not gone through the FFE eligibility determination and already have coverage through the FFE under the subscriber's policy.							
Email Address										
Contact the ER&R Support Center for assistance using this form: 1-855-591-7113 or ERRSupportCenter@cognosante.com			Additional information is available on zONE: https://zone.cms.gov/document/enrollment-resolution-and-reconciliation							
Required	Required	Required for prior year disputes if Segment ID is not provided in column F	Required	Required for prior year disputes if FFM Internal Record Inventory Number is not provided in column D	Required	Required	Required (must be greater than zero)	Required	Optional	Optional
		Required for current year disputes		Optional for current year disputes						
HIOS	Coverage Year	FFM Internal Record Inventory Number	FFM Exchange Assigned Policy ID	Segment ID	FFM Exchange Assigned Subscriber Identifier	Date to Begin Charging Newborn Premium	Subscriber Total Premium during Free Coverage Period	Subscriber APTC During Free Coverage Period	HICS Case ID	Issuer Assigned Dispute Control Number

- Segment ID should only be used for prior year disputes. Issuers may populate the FFM Internal Record Inventory Number field instead of the Segment ID field for prior year disputes.

Enrollment Dispute Form v12: Enrollment Blocker Tab

- Enrollment Blocker tab changes:
 - Removed Batch Number column
 - Removed FFM Benefit Start Date and FFM Benefit End Date columns

Enrollment Blocker

Point of Contact Name			Use the Enrollment Blocker tab to submit disputes related to Enrollment Blocker HICS cases. ER&R is able to update financial information, remove members, and adjust coverage periods. A consumer-initiated HICS case is required for ER&R to process the dispute. Issuers may submit open HICS cases using the HICS Direct Dispute process. If the HICS case is closed, the issuer may only submit the dispute using this form. ER&R will use the information in the dispute form fields, including the Comments field, and the information in the associated HICS case to resolve the dispute. NOTE: ER&R does not have the ability to add consumer information into the FFE. Only the dates and financial amounts can be updated to align with issuer data for the current coverage year. Additional information is available on ZONE: https://zone.cms.gov/document/enrollment-resolution-and-reconciliation								
Telephone Number											
Email Address											
Contact the ER&R Support Center for assistance using this form: 1-855-591-7113 or ERRSupportCenter@cognosante.com											
		The FFM Exchange- Assigned Policy ID from the disputed RCNO record	The entry must contain leading zeros.	Enter dollar amounts as XXX.XX.	Enter dollar amounts as XXX.XX.	The last two digits of the QHP ID	Enter dollar amounts as XXX.XX.	Enter dates in the RCNO format of YYYYMMDD.		An identifier chosen by the issuer	
Required	Required	Required	Required	Optional	Optional	Optional	Optional	Optional	Required	Optional	Optional
HIOS	Coverage Year	FFM Exchange Assigned Policy ID	FFM Exchange Assigned Subscriber Identifier	Total Premium to be Applied	APTC Amount	QHP Variant ID	CSR	Issuer Start Date as a result of Add or Removal of Member(s)	HICS Case ID	Issuer Assigned Dispute Control Number	Comments

- The Segment ID column was not added to the Enrollment Blocker tab. The FFM Exchange Assigned Policy ID and FFM Exchange Assigned Subscriber Identifier are required for all Enrollment Blocker disputes.

Enrollment Dispute Form v12: Mailing Address Change Tab

- Mailing Address Change tab changes:
 - Removed Batch Number column
 - Added Segment ID column
 - Added HICS Case ID column

Mailing Address Change

Point of Contact Name			Use the Mailing Address Change tab to submit address changes. Issuers should ensure they are submitting valid addresses. Mailing Address Changes can be submitted for current and prior year RCNO records. For current year address changes, the issuer must submit the same address in RCNI that is being requested using this form.									
Telephone Number												
Email Address												
Contact the ER&R Support Center for assistance using this form: 1-855-591-7113 or ERRSupportCenter@cognosante.com			Additional information is available on zONE: https://zone.cms.gov/document/enrollment-resolution-and-reconciliation									
Required	Required	Required for prior year disputes if Segment ID is not provided in column F	Required	Required for prior year disputes if FFM Internal Record Inventory Number is not provided in column D	Required	Required	Optional	Required	Required	Required	Optional	Optional
		Required for current year disputes		Optional for current year disputes								
HIOS	Coverage Year	FFM Internal Record Inventory Number	FFM Exchange Assigned Policy ID	Segment ID	FFM Exchange Assigned Subscriber Identifier	Issuer Mailing Address Line 1	Issuer Mailing Address Line 2	Issuer Mailing Address City	Issuer Mailing Address State	Issuer Mailing Address ZIP Code	HICS Case ID	Issuer Assigned Dispute Control Number

- Segment ID should only be used for prior year disputes. Issuers may populate the FFM Internal Record Inventory Number field instead of the Segment ID field for prior year disputes.

Enrollment Dispute Form v12: Agent Broker Information Tab

- Agent Broker Information tab changes:
 - Added Segment ID column
 - Added HICS Case ID column

Agent Broker Information

Point of Contact Name				Use the Agent Broker Information tab to remove or update the Agent Broker information associated to an exchange-assigned policy. Issuers should ensure they are submitting valid information. Updates will be made at the policy level for all active coverage spans. Agent Broker changes can be submitted for current and prior year RCNO records. For current year changes, the issuer must submit the same Agent Broker information in RCNI that is being requested using this form.							
Telephone Number											
Email Address											
Contact the ER&R Support Center for assistance using this form: 1-855-591-7113 or ERRSupportCenter@cognosante.com				Additional information is available on zONE: https://zone.cms.gov/document/enrollment-resolution-and-reconciliation							
Required	Required	Required	Required for prior year disputes if Segment ID is not provided in column G	Required	Required for prior year disputes if FFM Internal Record Inventory Number is not provided in column E	Required	Required for <i>Update</i> disputes	Optional for <i>Update</i> disputes	Required for <i>Update</i> disputes	Optional for <i>Update</i> disputes	Required for <i>Update</i> disputes
			Required for current year disputes		Optional for current year disputes		Must be left blank for <i>Remove</i> disputes	Must be left blank for <i>Remove</i> disputes	Must be left blank for <i>Remove</i> disputes	Must be left blank for <i>Remove</i> disputes	Must be left blank for <i>Remove</i> disputes
HIOS	Coverage Year	Action	FFM Internal Record Inventory Number	FFM Exchange Assigned Policy ID	Segment ID	FFM Exchange Assigned Subscriber Identifier	Issuer Agent Broker First Name	Issuer Agent Broker Middle Name	Issuer Agent Broker Last Name	Issuer Agent Broker Suffix	Issuer Agent Broker NPN

- Segment ID should only be used for prior year disputes. Issuers may populate the FFM Internal Record Inventory Number field instead of the Segment ID field for prior year disputes.

Q&A

