

Enrollment Reconciliation & IC834 Workgroup



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November 14, 2019

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IC834 – Housekeeping

- **The PO-IC834 reporting suite** (PO Summary, PO Detailed, and Reinstatement Detailed) for transactions submitted 11/5 – 11/11 was delivered yesterday.
- If you have any questions about these reports or any other IC834-related item, please contact Inbound834@bah.com

IC834 – Open Enrollment PO Report Delivery

- During Open Enrollment, issuers should expect PO Report delivery on Thursday or Friday (as opposed to Wednesday)
- Any further delays or deviations from this schedule will be communicated through the Thursday workgroup and if necessary, through CMS Issuer Communications

Introduction to IC834 Processing

Valid IC834 Code Combinations

The table below provides valid combinations of Maintenance Type Codes (MTCs), Maintenance Reason Codes (MRCs), and Additional Maintenance Reason Codes (AMRCs) to determine a transaction type for IC834 transactions. The **highlighted row** is new as of Fall 2019.

IF Maintenance Type Code (INS03)	AND Maintenance Reason Code (INS04)	AND Additional Maintenance Reason Code (2750 Loop)	THEN Transaction Type (derived by FFM)
021	28	CONFIRM	EFFECTUATION
024	59	CANCEL	CANCELLATION
024	14	CANCEL-FLC	CANCELLATION
024	07	CANCEL-FRD	CANCELLATION
024	07	CANCEL-RESCIND	CANCELLATION
024	59	TERM	TERMINATION
024	NULL	CANCEL-OTH	CANCELLATION
024	26	CANCEL-HICS	CANCELLATION
024	NULL	TERM-OTH	TERMINATION
024	26	TERM-HICS	TERMINATION
001	25	ISSUER MAINT	MAINTENANCE
001	NULL	NO CHANGE	MAINTENANCE
025	NULL	ISSUER – REINSTATEMENT	REINSTATEMENT
024	NULL	CANCEL-ANTIDUPLICATION	CANCELLATION
024	NULL	TERM-ANTIDUPLICATION	TERMINATION
024	NULL	CANCEL-OUT-OF-AREA	CANCELLATION

IC834 - Supporting Documentation & Resources

REFERENCE GUIDES

- **ASCX12 X12N/005010X220 Type 3 Technical Report (TR3)**
 - Reference guide for data submission of health care industry enrollment and maintenance transactions
- **[ASC X12 834 Companion Guide](#) (Companion Guide)**
 - Use in conjunction with the TR3 for Marketplace-specific implementation, including the creation of IC834 transactions

OTHER RESOURCES

- **[CMS zONE IC834 Site](#)** – includes the IC834 Education Suite:
 - [IC834 101](#) – *Overview of Inbound834*
 - [IC834 201](#) – *Preparing and Submitting Inbound834s*
 - [IC834 301](#) – *Troubleshooting and Resolving Rejections*
- **Inbound 834 Team**
 - Issuers can contact the Inbound 834 Support Team (Inbound834@bah.com) with any questions about topics such as submitting IC834 transactions, specific IC834 transactions submitted, and report delivery

Housekeeping: Pre-Audit & Reconciliation

- **Prior Plan Years (2014-2018)**
 - The next set of 1095-A Consumer-Initiated Dispute Update (1095Ax) Files will be distributed to Issuers today, Thursday, November 14th
 - **Please Note:** This is the final scheduled 1095Ax File delivery until February 2020
- **Plan Year 2016**
 - This month's 2016 FFM extract is scheduled for tomorrow, 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**

- This month's 2017 FFM extract is scheduled for tomorrow, 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**

- This month's 2018 FFM extract is scheduled for tomorrow, 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**

- This month's 2019 FFM extract is scheduled for tomorrow, 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 full 2020 FFM Extract was taken yesterday, Wednesday, November 13th at 6PM EST
 - The first comprehensive 2020 Enrollment Pre-Audit (AUD0) Files are scheduled for delivery to Issuers on tomorrow, Friday, November 15th
 - The next set of Missing Outbound 834 Incremental Pre-Audit (MOIPA0) Files is scheduled for delivery to impacted Issuers on Tuesday, November 19th
 - This file will include any enrollments where an 834 transaction failed to convey successfully to the Issuer after the Pre-Audit extract was taken on November 13th

Plan Year 2020 Off-Cycle Reconciliation

Plan Year 2020

- CMS plans to provide Issuers with an opportunity to exercise their production processes for 2020 reconciliation ahead of the first formal cycle in late December
- This off-cycle run is optional, however ***all Issuers are strongly encouraged to participate***
- Issuers can now submit RCNIO files to test file submission and validation processes
 - Please note that automated processes are not yet enabled for RCNIO file notifications; to inquire on the status of a submitted RCNIO file please send the filename to recon_issuer_support@bah.com
- The RCNIO File submission deadline for this optional Off-cycle run is **Thursday, December 5th** at 3PM EST
 - Issuer-submitted data will be compared against data from the FFM extract taken on Monday, December 2nd at 6PM EST
 - Issuers that participate will receive an RCNO0 File following processing; as a reminder, CMS will not process any updates to FFM data based upon the results of off-cycle reconciliation

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>

Retirement of Mass Effectuations/Cancellations

Implications for PY2020 Recon

- As communicated earlier this year, CMS has retired the Mass Effectuation process in reconciliation that would facilitate effectuation and update of records where there was not an even-sided match in recon
- This process also facilitated cancellation of records on the FFM where there was no even match but any records provided by the Issuer indicated cancellation of coverage for the enrollment group
- **Cancelling a policy with multiple segments:** Often near the beginning of a new plan year, enrollees will return to the Marketplace to update their income information for the new year; at this time, their subsidy eligibility may change slightly resulting in the creation of a new segment
 - Prior to the retirement of this mass effectuation/cancellation process Issuers were able to submit the cancel as either the single original segment with a cancel reason or include both segments
 - The logic associated with that process allowed us to fill in gaps such as missing segments to account for the total span of coverage – which in this case would be no coverage (cancellation)
 - Now the logic is stricter and to process the cancellation through reconciliation we would require both segments to be included, with the appropriate cancellation reason code. Broad education on this exact topic will be provided on next week's IC834/Recon call. The Education Suite will also be updated to account for this change.
 - **Note:** If the cancellation is already applied to the FFM (by IC834), then there would be no negative impact to leaving off the second segment on the cancelled policy; this only limits the ability to apply new cancels through recon as a fully even-sided match is required

Even-Sided Cancel Example

- Example: Kate enrolls effective 1/1/2020 and does not make her initial binder payment; while still active/uneffectuated on the FFM, Kate updates her income resulting in a different APTC calculation effective 1/5/2020
 - Kate never makes binder payment and her enrollment is cancelled by the Issuer on 1/20
 - The FFM will have **two** segments of coverage for Kate under the single policy reflecting the appropriate financial values for each segment

Member	Benefit Start Date	Benefit End Date	Exchange-Assigned Policy ID	Applied APTC Amount	Initial Prm Paid Indicator	Cancellation Reason	Termination Reason
Kate	1/1/2020	1/1/2020	10001	\$250	C	6	
Kate	1/5/2020	1/5/2020	10001	\$280	C	6	

- As shown in the example above, both records **must** be included for an even-sided match which will allow cancellation of the policy through automated reconciliation

Retirement of Mass Effectuations/Cancellations

Implications for PY2020 Recon

- **Cancelling a policy with multiple enrollees:** Historically, Issuers have only been required to submit the subscriber of the enrollment group on the RCNI file to accept and process a cancellation
- With the retirement of the mass effectuation/cancellation process, if the Issuer submits only the subscriber on a cancelled policy there will not be an even-sided match for the policy
- In some cases, the recon process will be able to fill in the missing dependent records when only the subscriber is submitted – resulting in a fully even-sided match, allowing the cancel to be processed through reconciliation
 - This will be true if all records submitted for the enrollment group are cancelled; if any active records are submitted for the dependents, even if on another policy, reconciliation will not add them to the cancelled policy and the match will not be even-sided
 - For best matching, Issuers are strongly encouraged to include all members of the enrollment group on the RCNI File even on cancelled records

Reminder: Enrollment Dispute Form v12

- **ER&R is now accepting Enrollment Dispute Form v12.**
 - As of November 12th, issuers should submit all enrollment disputes using v12.
- **ER&R is no longer accepting Enrollment Dispute Form v11.**
 - Issuers who submit disputes on v11 will receive response emails that include a copy of v12 and instructions to resubmit the disputes using the new form.
- Issuers who wish to use add-ins when submitting disputes must download and install the new v12 add-ins file.
 - Issuers should contact their IT department to uninstall any previous version of the add-ins and install the new version.
- The enrollmentdisputeformv12.xlsx and enrollment_disputes_addins_v12.0.zip files are available on zONE:
 - <https://zone.cms.gov/document/enrollment-resolution-and-reconciliation>

BAR Reinstatement Deadline

- Batch Auto-Reenrollment (BAR) is the process that creates new policies based on coverage from the previous year.
- UIEs will not BAR due to lack of an FFM record. Issuers should encourage those consumers to enroll during OE.
- Issuers must submit reinstatement disputes by 11/22/2019 to have those policies included in BAR.
- Policies that are reinstated after 11/22/2019 will not be correctly reenrolled, and the consumer will need to complete an enrollment for 2020 coverage.

HICS Direct Disputes: Date of Birth

- ER&R will now accept HICS Direct Disputes for Date of Birth (DOB) updates.
- Issuers should use this dispute type when a HICS case directs the issuer to update the DOB.
- The HICS Direct Dispute should include the following information:
 - FFE Exchange Assigned Policy ID*
 - Name of the member being updated*
 - New DOB*
 - Total Premium Amount after the DOB correction (required if being updated)

***NOTE:** This information is required for the dispute type. The case will be rejected if this information is not provided within the HICS Case Narrative or comments.

- If the case is an enrollment blocker, confirmation blocker, or related to a technical error code (i.e. 500.300588), issuers should notify their CMS Lead Caseworker/Account Manager. CMS prefers these cases be handled using a special process and generally result in an updated 834 transaction being sent to the issuer.

Q&A

