

Enrollment Reconciliation & IC834 Workgroup



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November 21, 2019

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IC834 – Housekeeping

- **The PO-IC834 reporting suite** (PO Summary, PO Detailed, and Reinstatement Detailed) for transactions submitted 11/12 – 11/18 ***was delayed***. Reports will be delivered today, Thursday, November 21.
- 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

Planning for the End of OE2019

- In anticipation of an IC834 hold starting Tuesday, December 10, 2019, CMS encourages all organizations to submit any outstanding IC834 transactions **by Saturday, December 7, 2019 at 11:59PM EST.**
- IC834 submissions sent by this date will be processed in time for inclusion within the December 2019 FFM Pre-Audit extract.
- After December 7, 2019, Issuers should continue to submit IC834 transactions as CMS will continue to process transactions received during the last week of Open Enrollment as possible, and Issuers will continue to receive functional acknowledgements in the form of TA1/999.
- Due to the expected high volume of consumer traffic, submissions received after December 7 may not be processed in time for the December Pre-Audit extract.
- Any IC834 files in the queue at the time of the hold will be processed once processing is re-started and Issuers will begin to receive appropriate Business Application Acknowledgements (BAA).

Housekeeping: Pre-Audit & Reconciliation

- **Prior Plan Years (2014-2018)**
 - 1095-A Consumer-Initiated Dispute Update (1095Ax) Files were delivered to Issuers last Thursday, November 14th
 - **Please Note:** That was the final scheduled 1095Ax File delivery until February 2020
- **Plan Year 2016**
 - This month's 2016 FFM extract was taken on Friday, November 15th at 6PM EST
 - Incremental Pre-Audit (ISIPA6) Files based upon that extract are scheduled for delivery to Issuers later today, Thursday, November 21st

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2017**
 - This month's 2017 FFM extract was taken on Friday, November 15th at 6PM EST
 - Incremental Pre-Audit (ISIPA7) Files based upon that extract were delivered to Issuers yesterday, Wednesday, November 20th
- **Plan Year 2018**
 - This month's 2018 FFM extract was taken on Friday, November 15th at 6PM EST
 - Incremental Pre-Audit (ISIPA8) Files based upon that extract were delivered to Issuers on Tuesday, November 19th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2019**

- This month's 2019 FFM extract was taken on Friday, November 15th at 6PM EST
- Comprehensive Enrollment Pre-Audit (AUD9) Files based upon that extract were delivered to Issuers on Tuesday, November 19th
- The RCNI9 submission deadline for November's Run 12 was **Tuesday, November 19th at 3PM EST**
 - RCNO9 Files are scheduled for delivery to Issuers tomorrow, Friday, November 22nd

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2020**
 - The first full 2020 FFM Extract was taken on Wednesday, November 13th at 6PM EST
 - The first comprehensive 2020 Enrollment Pre-Audit (AUD0) Files were delivered to Issuers on Friday, November 15th
 - A small number of Missing Outbound 834 Incremental Pre-Audit (MOIPA0) Files were delivered to impacted Issuers on Tuesday, November 19th
 - These files included any enrollments where an 834 transaction failed to convey successfully to the Issuer after the Pre-Audit extract was taken on November 13th
 - Passive Cancel Incremental Pre-Audit (BARCN0) Files were delivered to Issuers yesterday, Wednesday, November 20th
 - These files contained passive renewals that have been cancelled on the FFM due to an active enrollment made by the consumer for 2020 coverage

Plan Year 2020 Off-Cycle Reconciliation

Plan Year 2020

- CMS is providing 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 RCN10 files to test file submission and validation processes
- The RCN10 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 RCN00 File following processing; as a reminder, CMS will not process any updates to FFM data based upon the results of off-cycle reconciliation

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. The Education Suite will 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

Reconciling Agent/Broker Information

- As a reminder, Enrollment Reconciliation is the proper method for Issuers to ensure the FFM has the correct Agent/Broker attribution for their enrollments
- This is necessary so that proper attribution is reflected on any FFM enrollment channel and carries forward to any future enrollment actions including auto-renewal for the following plan year
- Issuers are expected to send the proper NPN and name of the Agent/Broker on record for each enrollment record on the RCNI File
 - Records sent with only an NPN or name but not both will not be updated

Reconciling Agent/Broker Information

- If the information submitted by the Issuer is different from the information currently stored on the FFM for that enrollment it will be changed on the FFM, with the following caveats:
 - The record match must be even-sided (i.e. the same number of records for the enrollment group on both the Issuer and FFM side)
 - There is a current limitation that only one Agent/Broker can be attributed to an FFM policy, as defined by Exchange-Assigned Policy ID; sending different Agent/Broker information on different records for the same policy will prohibit any update to that information via automated reconciliation

Reconciling Agent/Broker Information

- **Please Note:** Agent/Broker information cannot be removed entirely (i.e. changing from an Agent/Broker attribution on a policy to no Agent/Broker) through automated reconciliation; removal of this information must be done via an ER&R Enrollment Dispute
- ***Issuers should not attempt to circumvent this requirement by submitting dummy agent/broker information on the RCNI file***
- In the most recent 2019 reconciliation cycle (October's Run 11), a large volume of records were submitted with invalid agent broker information and Issuers will be required to submit disputes to the ER&R contractor to correct them.
- Agent/Broker information should always stay on the policy/application unless the consumer is directing the carrier to remove the agent/broker or change it to someone else because they have an updated Broker of Record letter
- **In addition to removing/changing data inappropriately from a Federal system, this action makes it difficult for CMS to run accurate data analysis and conduct program integrity efforts**

1095-A Reminder

- This is a friendly reminder to make sure your 2019 enrollment information is accurate and up-to-date for the upcoming release of 1095-As to your members
 - Check all remaining “initial” enrollments on your RCNI file (records submitted with Initial Premium Paid Status = “N”)
 - Submit effectuation or cancellations to CMS through enrollment reconciliation or the dispute process
 - Check all remaining “I” and “F” flags on your RCNO file
 - Make updates to your enrollment system or submit disputes or reconcile with CMS to make corrections as necessary
 - Submit timely grace period expiration terminations to CMS through Inbound 834s and report in enrollment reconciliation
 - Submit disputes to CMS to correct any remaining enrollment reconciliation issues by 12/23/19
 - Submit Enrollment Reconciliation updates in the December RCNI by 12/19/2019

Errors in 2019 enrollment that remain in January will lead to 1095-A errors, consumer disputes, research costs for CMS and issuers, and a poor customer experience for your members

UIR Report Delivery Date

- ER&R will deliver the Run 12 UIR Report on Friday, December 13th.
 - The UIR Report delivery date was delayed one week due to the Thanksgiving holiday.
- NOTE:** Only issuers with UIR records present in RCNO Run 12 will receive a UIR Report.

Reminder: 2020 Dispute Acceptance

- Issuers received the first 2020 FFM Extract files on 11/18/2019.
- ER&R is now accepting Rejected Enrollment and Reinstatement End Date 12/31 disputes for 2020 coverage.
- ER&R also began accepting HICS Direct Disputes on 11/18/2019, although issuers may experience a delay before seeing the corrections in the FFM Extract files.
- Issuers must wait until the first 2020 RCNO cycle is complete before submitting any other types of Enrollment Disputes for 2020 policies.

Reminder: 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 Enrollment Disputes to reinstate policies by 11/25/2019 to have those policies included in BAR.
- Policies that are reinstated after 11/25/2019 will not be correctly reenrolled, and the consumer will need to complete an enrollment for 2020 coverage.

zONE Publications

- ER&R released the Combined Enrollment and Payment Disputes TRG v9.0, which contains updates for the Enrollment Dispute Form v12.
- ER&R released the HICS Direct Dispute Cheat Sheet v6.0 and HICS Direct Dispute Master Guidance v4.0, both of which contain guidance for submitting Date of Birth disputes.
- Access the updated documentation on CMS zONE at <https://zone.cms.gov/document/enrollment-resolution-and-reconciliation>.

Q&A

