

Enrollment Reconciliation & IC834 Workgroup



✓ **IC834**

- Housekeeping
- Reminder - Planning for the End of OE2019
- Open Enrollment Errors to Avoid

✓ **Recon**

- Housekeeping
- Plan Year 2020 Off-Cycle Reconciliation
- Updated Pre-Audit and Reconciliation Calendar
- 1095-A Reminder

✓ **ER&R**

- 2019 UIE Manual 1095-A Timeline
- 2019 UIE Manual Payment Timeline
- Reminder: UIR Report Delivery Date

✓ **Q&A**

December 05, 2019

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IC834 – Housekeeping

- **The PO-IC834 reporting suite** (PO Summary, PO Detailed, and Reinstatement Detailed) for transactions submitted 11/26 – 12/2 was delivered yesterday.
- If you have any questions about these reports or any other IC834-related item, please contact Inbound834@bah.com

Reminder - 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.
- **For Reference:**
 - Please continue sending IC834 transactions throughout this time
 - Be aware:
 - IC834 files in the queue at the time of the hold will be processed when processing is re-started
 - BAAs may be delayed but issuers will continue to receive functional acknowledgements (TA1/999)
 - Submissions received after 12/7 may not be processed in time for the December Pre-Audit extract

Open Enrollment Errors to Avoid

- Now that the FFM is accepting 2020 policies, Issuers should ensure systems are updated to include the new Plan Year (i.e. eligibility and effective dates, QHPID values, etc.)
- CMS expects Issuers to submit timely and accurate transactions via IC834:
 - Effectuations are expected within a few days of receiving premium payment
 - Cancellations should take eligible grace periods into account (varies by state)
 - Terminations for 1/1 policies are not expected at this time

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2016**

- This month's 2016 FFM extract will be taken on Monday, December 16th at 3AM EST
 - Incremental Pre-Audit (ISIPA6) Files based upon that extract are scheduled to be delivered to Issuers on Friday, December 20th

- **Plan Year 2017**

- This month's 2017 FFM extract will be taken on Monday, December 16th at 3AM EST
 - Incremental Pre-Audit (ISIPA7) Files based upon that extract are scheduled to be delivered to Issuers on Friday, December 20th

- **Plan Year 2018**

- This month's 2018 FFM extract will be taken on Monday, December 16th at 3AM EST
 - Comprehensive Enrollment Pre-Audit (AUD8) Files based upon that extract are scheduled to be delivered to Issuers on Thursday, December 19th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2019**
 - This month's 2019 FFM extract will be taken on Monday, December 16th at 3AM EST
 - Pre-Audit (AUD9) Files based upon that extract are scheduled to be delivered to Issuers on Thursday, December 19th
 - The RCNI9 submission deadline for December's Run 13 is **Thursday, December 19th at 3PM EST**
 - **As a reminder, this is the final reconciliation cycle prior to the initial distribution of consumer 1095-A forms for 2019**

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2020**

- The latest 2020 FFM extract was taken on Tuesday, December 3rd at 6PM EST
 - Comprehensive Pre-Audit (AUD0) Files based upon that extract were delivered to Issuers yesterday, Wednesday, December 4th
 - Passive Cancel Incremental Pre-Audit (BARCN0) Files were also delivered to Issuers on Wednesday, December 4th
- Missing Outbound 834 Incremental Pre-Audit (MOIPA0) Files are scheduled for delivery to impacted Issuers on Tuesday, December 10th
- The next 2020 FFM extract will be taken on Monday, December 16th at 3AM EST
 - Comprehensive Pre-Audit (AUD0) Files based upon that extract are scheduled to be delivered to Issuers on Wednesday, December 18th
 - Passive Cancel Incremental Pre-Audit (BARCN0) Files are also scheduled for delivery to Issuers on Wednesday, December 18th

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***
- The RCNIO File submission deadline for this optional Off-cycle run is **today, December 5th at 3PM EST**
 - As of 11AM today we have received RCNIO Files from approximately **40%** of 2020 FFM Issuers
 - Issuer-submitted data will be compared against data from the FFM extract taken on Tuesday, December 3rd at 6PM EST
 - Issuers that participate will receive an RCNOO File following processing; as a reminder, CMS will not process any updates to FFM data based upon the results of off-cycle reconciliation

Updated Pre-Audit and Reconciliation Calendar

- CMS has published an updated 2019-20 Pre-Audit and Reconciliation Calendar and Pre-Audit and Monthly IPA File Delivery Cadence, both available on zONE at:
<https://zone.cms.gov/document/pre-audit-and-recon-calendar-and-file-specification>
- The updates in this version include:
 - Full calendar of file submission deadlines and file deliveries through April 2020 in the Pre-Audit and Reconciliation Calendar
 - Full schedule of monthly Pre-Audit and Incremental Pre-Audit File deliveries for calendar year 2020 in the Monthly IPA File Delivery Cadence document

January 2020

Sun	Mon	Tues	Wed	Thurs	Fri	Sat
29	30	31 Delivery to Issuers: • 2020 RCNO File HIX 820 Delivery (11/15/19 FFM Extract)	Jan 1 New Year's Day	2	3	4
5	6	7	8	9	10	11
12	13 2016 Pre-Audit Extract (6:00 pm ET)	14	FFM Updated 2020 & 2019 2020, 2019 Pre-Audit Extract (6:00 pm ET) 2018 & 2017 Incremental Pre-Audit Extract (6:00 pm ET) Delivery to Issuers: 2016 Pre-Audit File	16	17 Delivery to Issuers: • 2020 Pre-Audit File Delivery to Issuers: • 2019 Pre-Audit File	18
Delivery to Issuers: • 2020 Carry forward Cancel 834s		PPR Delivery 12/16/19 FFM Ext				
19	20 Martin Luther King, Jr. Day	21 Delivery to Issuers: • 2018 Incremental Pre-Audit File Delivery to Issuers: • 2017 Incremental Pre-Audit File	22 Treasury Payment	23 2019 RCNI Due 3pm	24	25
26	ER&R Dispute Submissions Due	Delivery to Issuers: • 2019 RCNO File	29	2020 RCNI Due 3pm	31 HIX 820 Delivery (12/16/19 FFM Extract)	Feb 1

February 2020

Sun	Mon	Tues	Wed	Thurs	Fri	Sat
26	27 ER&R Dispute Submissions Due	28 Delivery to Issuers: • 2019 RCNO File	29	30 2020 RCNI Due 3pm	31	Feb 1
2	3	4 Delivery to Issuers: • 2020 RCNO File	5 Delivery to Issuers: • 1095A Dispute Correction IPA Files	6	7	8
9	10	11	12 Delivery to Issuers: • 2020 Carry forward Cancel 834s PPR Delivery 01/15/20 FFM Extract	13 2015 Pre-Audit Extract (6:00 pm ET)	14	FFM Updated 2020 & 2019 2020, 2019 Pre-Audit Extract (6:00 pm ET) 2018 & 2017 Incremental Pre-Audit Extract (6:00 pm ET)
16	17 Presidents' Day	18 Delivery to Issuers: • 2015 Pre-Audit File	19 Delivery to Issuers: • 2020 Pre-Audit File Delivery to Issuers: • 2019 Pre-Audit File Delivery to Issuers: • 1095A Dispute Correction IPA Files	20 2019 RCNI Due 3pm Delivery to Issuers: • 2018 Incremental Pre-Audit File Delivery to Issuers: • 2017 Incremental Pre-Audit File Treasury Payment	21	22
23	24 ER&R Dispute Submissions Due	25 Delivery to Issuers: • 2019 RCNO File	26	27 2020 RCNI Due 3pm	28 HIX 820 Delivery (01/15/20 FFM Extract)	29



March 2020

Sun	Mon	Tues	Wed	Thurs	Fri	Sat
March 1	2	3 Delivery to Issuers: • 2020 RCNO File	4 Delivery to Issuers: • 1095A Dispute Correction IPA Files	5	6	7
8	9	10	11	12	2014 Pre-Audit Extract (6:00 pm ET)	14
				Delivery to Issuers: • 2020 Carry forward Cancel 834s		
			PPR Delivery 02/15/20 FFM Extract			
FFM Updated 2020 & 2019	16	Delivery to Issuers: • 2020 Pre-Audit File	Delivery to Issuers: • 1095A Dispute Correction IPA Files	19	20	21
2020, 2019 Pre-Audit Extract (6:00 pm ET)		Delivery to Issuers: • 2019 Pre-Audit File	Delivery to Issuers: • 2018 Incremental Pre- Audit File	2019 RCNI Due 3pm	Treasury Payment	
2018 & 2017 Incremental Pre-Audit Extract (6:00 pm ET)		Delivery to Issuers: • 2014 Pre-Audit File	Delivery to Issuers: • 2017 Incremental Pre- Audit File			
22	23 ER&R Dispute Submissions Due	24 Delivery to Issuers: • 2019 RCNO File	25	26 2020 RCNI Due 3pm	27	28
29	30	31 Delivery to Issuers: • 2020 RCNO File HIX 820 Delivery (02/15/20 FFM Extract)	April 1 st Delivery to Issuers: • 1095A Dispute Correction IPA Files	2	3	4



April 2020

Sun	Mon	Tues	Wed	Thurs	Fri	Sat
29	30	31 Delivery to Issuers: • 2020 RCNO File	April 1st Delivery to Issuers: • 1095A Dispute Correction IPA Files	2	3	4
5	6	7	8	9	10	11
12	13	14	FFM Updated 2020 & 2019 2020, 2019, 2018 Pre- Audit Extract (6:00 pm ET) 2017 Incremental Pre- Audit Extract (6:00 pm ET) Delivery to Issuers: • 1095A Dispute Correction IPA Files	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	May 1	2

PPR Delivery 03/15/20 FFMExtract



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Pre-Audit and Monthly IPA File Delivery Cadence in Calendar Year 2020

Calendar Month	Coverage Year 2014	Coverage Year 2015	Coverage Year 2016	Coverage Year 2017	Coverage Year 2018	Coverage Year 2019	Coverage Year 2020
January	N/A	N/A	Full	Incremental	Incremental	Full	Full
February	N/A	Full	N/A	Incremental	Incremental	Full	Full
March	Full	N/A	N/A	Incremental	Incremental	Full	Full
April	N/A	N/A	Incremental	Incremental	Full	Full	Full
May	N/A	Incremental	N/A	Incremental	Incremental	Full	Full
June	Incremental	N/A	N/A	Full	Incremental	Full	Full
July	N/A	N/A	Incremental	Incremental	Incremental	Incremental	Full
August	N/A	Incremental	N/A	Incremental	Full	Incremental	Full
September	Incremental	N/A	N/A	Incremental	Incremental	Full	Full
October	N/A	N/A	Incremental	Incremental	Incremental	Incremental	Full
November	N/A	Incremental	N/A	Incremental	Incremental	Incremental	Full
December	Incremental	N/A	N/A	Incremental	Incremental	Full	Full

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 IC834, 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

2019 UIE Manual 1095-A Timeline

- ER&R will conduct manual 1095-A activities as follows:
 - **January 2020:** Based on Run 12 (November 2019) RCNO data, generate manual Form 1095-As for Prior_Year and FFM_Enrollment_Blocker UIEs and send to consumers
 - **April 2020:** Compare UIE data in Run 12 with Run 16 and send any manual Form 1095-A corrections to consumers

2019 UIE Manual Payment Timeline

- The manual payment activities are as follows:
 - **April 2020:** Analyze Run 16 (March 2020) RCNO data to identify Prior_Year UIEs that are eligible for payment
 - **May 2020:** Deliver Manual Payment Summary and Detail Reports to issuers
 - **June 2020:** Issuers receive adjustments in the June payment cycle
- Issuers should ensure financial alignment of Enrollment Blockers by submitting HICS cases through the HICS Direct Dispute process, as manual payments will not be made.
- Per the 04/17/2019 guidance from CMS, manual payment adjustments will not be made on any issuer reported coverage after 07/31/2019.
 - Access this guidance on CMS zONE at [https://zone.cms.gov/system/files/documents/2019_uie_issuer_letter .pdf](https://zone.cms.gov/system/files/documents/2019_uie_issuer_letter.pdf).
 - For additional guidance or for issuers who are new to the UIR process, please refer to the UIR Master Guidance or UIR TRG on CMS zONE at <https://zone.cms.gov/document/enrollment-resolution-and-reconciliation>.

Reminder: UIR Report Delivery Date

- ER&R will deliver the Run 12 UIR Report on 12/13/2019.
- The UIR Report delivery date was delayed one (1) week due to the Thanksgiving holiday.

NOTE: Only issuers with UIR records present in RCNO Run 12 will receive a UIR Report.

Q&A

