

Enrollment Reconciliation & IC834 Workgroup

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December 12, 2019

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Enrollment Team Issuer/DE Partner Webinar Cadence

November 2019							December 2019						
Sun	Mon	Tues	Wed	Thurs	Fri	Sat	Sun	Mon	Tues	Wed	Thurs	Fri	Sat
01	02	03 CMS Issuer Technical Workgroup 3:00pm-4:30	04	05 Data Recon & Inbound 834/BAA Workgroup 12:30-1:30pm	06	07							
08	09 CCIIO Enrollment Webinar(Policy Focus) 12:00pm-1:00pm	10 CMS Issuer Technical Workgroup 3:00pm-4:30	11	12 Data Recon & Inbound 834/BAA Workgroup 12:30-1:30pm	13	14							
15	16 CCIIO Enrollment Webinar(Policy Focus) 12:00pm-1:00pm	17 CMS Issuer Technical Workgroup 3:00pm-4:30	18	19 Data Recon & Inbound 834/BAA Workgroup 12:30-1:30pm	20	21							
22	23	24	25	26	27	28	There will be NO Issuer facing calls for our team December 23-27						
29	30	31	01 New	02 Year's Day	03	04	There will be NO Issuer facing calls for our team December 30- January 3						

IC834 – Housekeeping

- **The PO-IC834 reporting suite** (PO Summary, PO Detailed, and Reinstatement Detailed) for transactions submitted 12/3 – 12/9 was delivered yesterday.
- If you have any questions about these reports or any other IC834-related item, please contact Inbound834@bah.com

Reminder – Final Week of OE2020

- The FFM receives a high volume of enrollment traffic into the Marketplace during the final week of Open Enrollment. With the end of Open Enrollment on Sunday, December 15, **IC834 processing may be delayed starting the evening of Thursday, December 12, 2019.**
 - As a result, trading partners may not receive associated Business Application Acknowledgments (BAA) under the normal schedule
- Please continue sending IC834 transactions throughout this time
 - IC834 files in the queue at the time of any holds will be processed when processing is re-started
 - BAAs may be delayed but issuers will continue to receive functional acknowledgements (TA1/999)

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**
 - RNC09 Files are scheduled for distribution to participating Issuers on Thursday, December 26th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2020**

- Missing Outbound 834 Incremental Pre-Audit (MOIPA0) Files were delivered 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
- The RCN10 submission deadline for the first production 2020 enrollment reconciliation cycle (December's Run 1) is **Thursday, December 26th at 3PM EST**
 - RNCO0 Files are scheduled for distribution to participating Issuers on Tuesday, December 31st

Plan Year 2020 Off-Cycle Reconciliation

Plan Year 2020

- CMS allowed Issuers an opportunity to exercise their production processes for 2020 reconciliation ahead of the first formal cycle in late December
- The RCNIO File submission deadline for this optional Off-cycle run was last Thursday, December 5th at 3PM EST
 - Issuer-submitted data was compared against data from the FFM extract taken on Tuesday, December 3rd at 6PM EST
 - Participating Issuers received an RCNO0 File yesterday, Wednesday, December 11th
 - 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

Additional Information: Custodial Parent Cleanup

Incremental Pre-Audit Files

- On Monday, December 9th, CMS distributed Incremental Pre-Audit (ISIPA0) Files following a data cleanup to correct Custodial Parent information on some 2020 passive enrollments
- Per the communications, it was expected that in most cases Issuers would see the removal of the Custodial Parent information as it would be the same as the subscriber of the policy
- Several Issuers noted that for the records received on the ISIPA0 files, in most cases both the Custodial Parent and Responsible Person information was populated for child enrollees, even if it was the same as the subscriber of the enrollment group

Additional Information: Custodial Parent Cleanup

Incremental Pre-Audit Files

- This discrepancy is due to the difference between the way Custodial Parent and Responsible Person information is conveyed on the Pre-Audit File vs an 834; the FFM typically records the subscriber of the policy as both the Custodial Parent and Responsible Person for any dependent children in the absence of another Custodial Parent/Responsible Person being designated during the application process
- The 834 generation process will only send a Custodial Parent for a child enrollee if that individual is different from the subscriber of the policy
- Likewise, on an 834 a Responsible Person will only be sent if there is no Custodial Parent designated and the Responsible Person is different from the subscriber of the policy
- The Pre-Audit provides the information as it resides on the FFM and includes the Custodial Parent/Responsible Person even if it is the same as the subscriber

Additional Information: Custodial Parent Cleanup

Incremental Pre-Audit Files

- How should Issuers handle these ISIPA0 Files?
 - The cleanup restored the Custodial Parent/Responsible Person information on the FFM to the current state of the 2019 enrollment
 - Issuers should update their records based upon the ISIPA0 File as follows:
 - **If the Custodial Parent and Responsible Person information matches *and* is the same as the subscriber of the enrollment group:** remove the Custodial Parent/Responsible Person information from the enrollment in your system as needed to align with how the information would have been conveyed via 834
 - **If the Custodial Parent is different from the subscriber of the enrollment group:** update the Custodial Parent information for the child enrollee to the Custodial Parent listed on the ISIPA0 File
 - **If the Custodial Parent is not listed but a Responsible Person is listed and is different from the subscriber of the enrollment group:** update the Responsible Person information for the child enrollee to the Responsible Person listed on the ISIPA0 File

Reinstatements After BAR

- Policies that are reinstated after BAR ends on 12/16/2019, through either Reconciliation or disputes, will not be correctly reenrolled for 2020 coverage.
- CMS will identify consumers who are not enrolled in a 2020 health plan due to the associated 2019 health plan enrollments being reinstated after BAR.
- CMS will tag those consumers' Marketplace accounts with SEPs to allow the consumers to enroll in 2020 coverage by contacting the Marketplace Call Center.
 - If a consumer enrolls under the SEP, the issuer will get an 834 transaction with a prospective date (and potentially a HICS case to make it retroactive to January 1, 2020, at the enrollee's option).
- ER&R will send EFT files to impacted issuers from January through April, along with an email communication that includes the filename.
- Impacted issuers are encouraged to complete outreach and advise the consumer(s) to contact the Marketplace Call Center to enroll in a 2020 plan.

Reminder: 2020 Dispute Acceptance

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

zONE Publications

- ER&R released the UIR TRG v8.0 and UIR Master Guidance v3.3, which contain minor cosmetic updates.
- ER&R released the CCIIO Enrollment Dispositions List, which contains minor updates to some disposition code verbiage.
- Access the updated documentation on CMS zONE at <https://zone.cms.gov/document/enrollment-resolution-and-reconciliation>.

Q&A

