

Enrollment Reconciliation & IC834 Workgroup

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December 19, 2019

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November 2019						
December 2019						
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 12/10 – 12/16 *is delayed* due to the processing hold for the end of Open Enrollment.
- Reports are expected to be sent out no later than Friday, December 20.
- CMS will update issuers via the daily CMS Issuer Communication blast email if any further delays of these reports are expected.
- If you have any questions about these reports or any other IC834-related item, please contact Inbound834@bah.com

IC834 Processing Hold – End of OE 2020

- **Thursday, December 12th**
 - Processing held after 8 pm EST; all IC834s received before this time were processed
- **Friday, December 13th - Sunday, December 15th**
 - IC834 processing held
- **Monday, December 16th – Wednesday, December 18th**
 - IC834 processing restarted on the afternoon of 12/16 and continued through the extended deadline

Note:

- IC834s received and successfully processed by 8PM EST on Thursday, December 12th will be reflected within the Pre-Audit delivered Wednesday, December 18th.
- CMS intends to adjust the Policy Based Payment cut-off to 3AM EST on Wednesday, December 18th, to include enrollments created during this OE extension. Effectuated 2020 enrollments and upper bound adjustments to include enrollments created through the new deadline will be reflected in January payments.

IC834 – Holiday Reporting Schedule

- During the next two weeks, the PO-IC834 reporting suite (PO Summary, PO Detailed, and Reinstatement Detailed) ***will be delayed*** due to the holidays.
- For the week of 12/23:
 - Reports for transactions submitted 12/17 – 12/23
 - Expect to receive report on Thursday, 12/26
- For the week of 12/30:
 - Reports for transactions submitted 12/24 – 12/30
 - Expect to receive report on Thursday, 1/2

Option To Shift Effective Date from 2/1 to 1/1 for Certain 2020 SEP Enrollees

Background

The 2020 Open Enrollment Period (OEP) ended at 3AM EST on Monday, December 16th. Due to technical issues that may have blocked consumers from enrolling in the final hours of OEP, CMS extended the deadline to sign-up for coverage with a January 1st effective date. This extension started at 3PM EST on Monday, December 16th and ended at 3AM EST on Wednesday, December 18th.

Issue

There was a 12-hour time period on December 16th during which consumers that selected a plan through a Special Enrollment Period with the regular effective date rule (i.e. 15th of the month rule) received a February 1st effective date. These enrollees are eligible for a January 1st effective date.

Option To Shift Effective Date from 2/1 to 1/1 for Certain 2020 SEP Enrollees (cont.)

Marketplace Outreach & HICS Process

The Federally-facilitated Marketplace (FFM) will email impacted consumers to advise them that they are eligible for a January 1st effective date and tell them to contact the Marketplace Call Center to change their effective date. The Marketplace Call Center will notify issuers of the change in effective date from February 1st to January 1st through HICS.

Issuer Action

Issuers may directly change the effective date from February 1st to January 1st without a HICS case from the FFM if an impacted consumer requests the change. Issuers can identify consumers as impacted by the issue if 1) the consumer's 834 was created between 3 AM EST and 3PM EST on Monday, December 16th and 2) the consumer's 834 includes a SEP reason code of NE, FC, or 43. Issuers can use enrollment reconciliation processes to update the effective date.

Open Enrollment Deadline Extension – Operational Considerations for Issuers

- **2020 Pre-Audit and Passive Cancel Files:**
 - Yesterday, Wednesday, December 18th CMS delivered three files:
 - Comprehensive 2020 Enrollment Pre-Audit Files (Function Code AUD0), which will include enrollments as of Monday, December 16th at 3AM EST
 - 2020 Passive Cancel Incremental Pre-Audit Files (Function Code BARCN0), that will reflect passive renewals (BAR) that have been cancelled due to the consumer making an active plan selection for 2020 through the extended deadline of Wednesday, December 18th at 3AM EST
 - 2020 Custodial Parent Cleanup Finder Files (Function Code MISC0), that will identify additional enrollments on the 2020 Pre-Audit Files that have had Custodial Parent information corrected since the prior set of Custodial Parent Cleanup Incremental Pre-Audit Files were delivered
 - An additional 2020 Deadline Extension IPA File (Function Code ISIPA0), inclusive of all new enrollment activity occurring between 3AM EST Monday, December 16th and 3AM EST Wednesday, December 18th will be delivered later today, Thursday, December 19th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2016**

- This month's 2016 FFM extract was taken on Monday, December 16th at 3AM EST
 - Incremental Pre-Audit (ISIPA6) Files based upon that extract are scheduled to be delivered to Issuers tomorrow, 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 tomorrow, 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 today, 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 today, Thursday, December 19th
 - The RCNI9 submission deadline for December's Run 13 is **today, December 19th at 3PM EST**
 - **As of noon today, just under 93% of Issuers have successfully submitted for Run 13**
 - **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**

- File deliveries for PY2020 were detailed in the OE Extension section of this presentation
- The RCNIO submission deadline for the first production 2020 enrollment reconciliation cycle (December's Run 1) is **next Thursday, December 26th at 3PM EST**
 - **Please Note:** Despite the OE Extension to December 18th, the RCNIO data submitted by Issuers will be compared to the FFM extract taken at 3AM EST on December 16th
 - Issuers should work to align the data submitted on the RCNI to transaction received from the FFM through December 16th for best matching and proper reconciliation outcomes
 - **As of 11AM today, just under 22% of Issuers have successfully submitted for Run 1**
 - RNC00 Files are scheduled for distribution to participating Issuers on Tuesday, December 31st

Refresher: Avoiding FR9 Disposition Codes

- Issuers receive disposition code FR9 for current year disputes when the issuer value on the dispute form does not match the issuer value in the RCNO. In most cases, this error is caused by the issuer entering the FFM Benefit End Date into the Issuer Value field on the dispute form.
 - Rule Description: End Date – Different in the RCNO file than on the Dispute Form
 - Verbiage Returned to Issuer: *The RCNI file submitted reflects a Benefit End Date of [@@RCNO.Issuer_PLAN_BNFT_END_DT]. If you believe that the Benefit End Date should be [@@Dispute.IssuerValue], the issuer must apply the appropriate Benefit End Date on the RCNI before it can be reviewed and updated via the ER&R dispute process. If you have questions or need technical assistance with updating the RCNI to ensure it is correct, please contact the FMCC help desk at fmcc@cms.hhs.gov.*
- To prevent these errors, issuers should enter the desired end date in the Issuer Value field on the dispute form and ensure this value matches the value the issuer reported in the RCNI file.

Q&A

