

Enrollment Reconciliation & IC834 Workgroup



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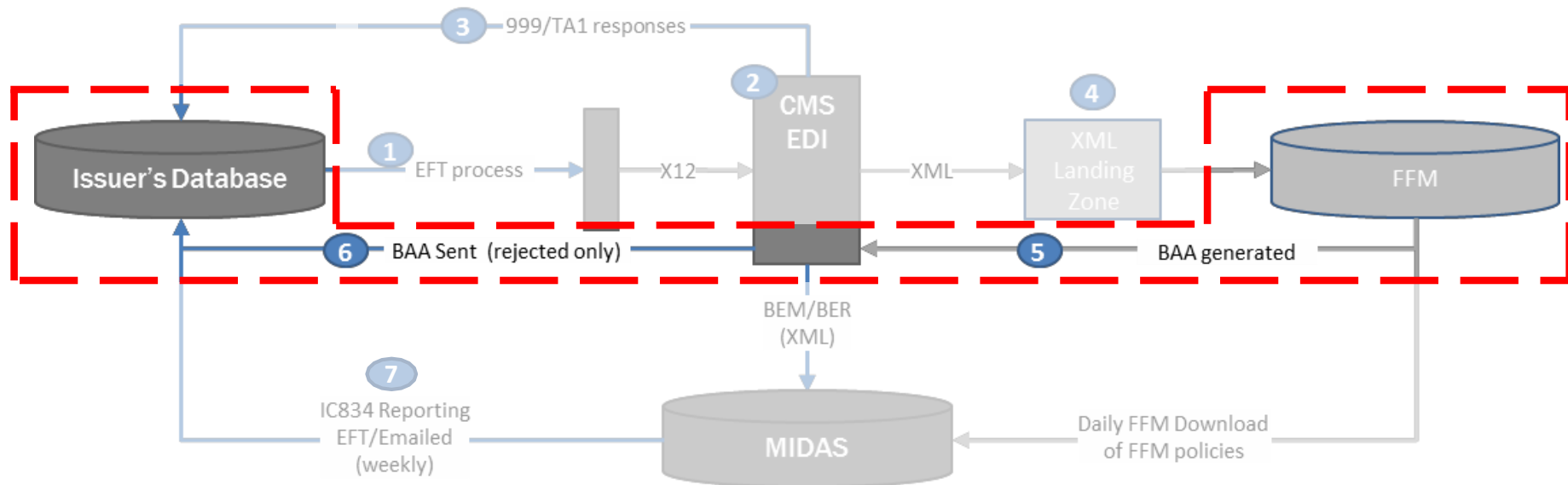
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IC834 – Housekeeping

- **The PO-IC834 reporting suite** (PO Summary, PO Detailed, and Reinstatement Detailed) for transactions submitted from 12/31 – 1/6 was sent out yesterday.
- If you have any questions about these reports or any other IC834-related item, please contact Inbound834@bah.com

IC834 Submission Cycle - FFM Validation and BAAs



Input to Process

- XML IC834 transactions

Output of Process

- FFM validation completed
- Positive/Negative BAAs generated
- Negative BAAs sent to Issuers

IC834 Submission Cycle - What are BAAs?

The Business Application Acknowledgement (BAA) is an XML document generated by the Marketplace in response to an IC834 file from an Issuer that has passed EDI validation.

- An Inbound Functional Group from the issuer will contain enrollment transaction information for one or more policies under that given QHP (14 character)
- Issuers will receive status for each rejected ST-SE 834 within a BAA file
- Each BAA file will have the following sections:
 - 1. File Information**
 - Non-repeating metadata information to link the BAA response to the corresponding inbound 834 file
 - Non-repeating metadata identifiers including a unique identifier, sender and receiver information, date and time, version, etc.
 - 2. Transaction Information**
 - Repeating transactional elements that identify the subscriber corresponding to each policy that the FFM encountered an error while processing
 - 3. Error Information**
 - Repeating error information or each erroneous data element

IC834 Submission Cycle - BAA Example

834BA XML Pattern

File Information

```
<?xml version="1.0" encoding="UTF-8"?>
<BusinessApplicationAcknowledgementRequest xmlns="http://aat.dsh.cms.gov">
  <FileInformation>
    <UniqueControlNumberID></UniqueControlNumberID>
    <SenderID></SenderID>
    <ReceiverID></ReceiverID>
    <TradingPartnerID></TradingPartnerID>
    <ExchangeCode></ExchangeCode>
    <EntityCode></EntityCode>
    <TransactionCode></TransactionCode>
    <VersionNumber></VersionNumber>
    <CurrentTimeStamp></CurrentTimeStamp>
    <OriginalInterchangeControlNumber></OriginalInterchangeControlNumber>
    <OriginalGroupControlNumber></OriginalGroupControlNumber>
    <OriginalGroupTimeStamp></OriginalGroupTimeStamp>
  </FileInformation>
```

ApplicationStatusCode

Accepted BAA = TA

Rejected BAA = TR

Transaction Information

```
<OriginalTransactionInformation>
  <ApplicationStatusCode>TR</ApplicationStatusCode>
  <Identifiers>
    <OriginalTransactionControlNumber></OriginalTransactionControlNumber>
    <SubscriberID></SubscriberID>
    <ExchangeAssignedMemberID></ExchangeAssignedMemberID>
    <IssuerAssignedMemberID></IssuerAssignedMemberID>
    <IssuerAssignedSubscriberID></IssuerAssignedSubscriberID>
    <ContractCode></ContractCode>
    <GroupPolicyNumber></GroupPolicyNumber>
  </Identifiers>
```

ElementInError

States the field name that is incorrect or "N/A" if the error doesn't pertain to one field

Error Information

(this loop is only included for Rejected BAA errors)

```
<OriginalTransactionError>
  <ElementInError>N/A</ElementInError>
  <ErrorInformation>
    <IndustryErrorCode>E095</IndustryErrorCode>
    <ErrorDescription>Business Process transaction out of sequence</ErrorDescription>
  </ErrorInformation>
</OriginalTransactionError>
</OriginalTransactionInformation>
</BusinessApplicationAcknowledgementRequest>
```

IndustryErrorCode

E025, E095, E046, E051, E050, E047, E054, E032, E087, E030, E126, E127, E128, E129, E130, E093

ErrorDescription Examples

E025 = Duplicates

E095 = Business Process transaction out of sequence

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2016**
 - This month's 2016 FFM extract will be taken on Monday, January 13th at 6PM EST
 - Comprehensive 2016 Pre-Audit (AUD16) Files based upon that extract are scheduled for delivery to Issuers on Wednesday, January 15th
- **Plan Year 2017**
 - This month's 2017 FFM extract will be taken on Wednesday, January 15th at 6PM EST
 - Incremental 2017 Pre-Audit (ISIPA7) Files based upon that extract are scheduled to be delivered to Issuers on Tuesday, January 21st
- **Plan Year 2018**
 - This month's 2018 FFM extract will be taken on Wednesday, January 15th at 6PM EST
 - Incremental 2018 Pre-Audit (ISIPA8) Files based upon that extract are scheduled for delivery to Issuers on Tuesday, January 21st

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2019**

- This month's 2019 FFM extract will be taken on Wednesday, January 15th at 6PM EST
- Comprehensive 2019 Pre-Audit (AUD9) Files based upon that extract are scheduled for delivery to Issuers on Friday, January 17th
- The RCNI9 submission deadline for January's Run 14 is **Thursday, January 23rd at 3PM EST**
 - RCNO9 files will be distributed to participating Issuers on Tuesday, January 28th

- **Plan Year 2020**

- This month's 2020 FFM extract will be taken on Wednesday, January 15th at 6PM EST
- Comprehensive 2020 Pre-Audit (AUD0) Files based upon that extract are scheduled for delivery to Issuers on Friday, January 17th
- The RCNI0 submission deadline for January's Run 2 is **Thursday, January 30th at 3PM EST**
 - RCNO0 files will be distributed to participating Issuers on Tuesday, February 4th

Updated Recon Education Suite Published

- CMS has published an updated version of the Enrollment Reconciliation Education Suite (Version 5.1)
 - The Enrollment Reconciliation Education Suite is a comprehensive document containing guidance regarding proper use of Enrollment Pre-Audit Files, submission of RCNI Files, understanding enrollment reconciliation data, etc.
- The updated document is available on zONE at:
<https://zone.cms.gov/document/enrollment-data-reconciliation>
- Version 5.1 includes:
 - Updated content to reflect sunseting of mass effectuation process in enrollment reconciliation
 - Updated reconciliation business rules
 - New content regarding FFM enrollment data, as shared in Recon 101 for PY2020
 - Other general updates to ensure consistency

Submitting 2020 and 2019 Disputes

- ER&R is now accepting all types of Enrollment Disputes, including HICS Direct Disputes, for 2020 policies.
- As a reminder, 2019 policies are considered current year for dispute purposes until 04/01/2020.
- Enrollment Disputes and Payment Disputes for 2019 policies will not require Account Manager approval until 05/01/2020.
NOTE: ER&R will complete all 2019 disputes submitted before 05/01/2020 normally, even if the disputes are still in process on 05/01/2020.

UIR Report Delivery

- ER&R categorized most “I” records present in RCNO Run 1 for plan year 2020 as FFM_Timing_Issues, which will be resolved in Run 2.
- ER&R will not distribute UIR Reports for Run 1 and will deliver Run 2 reports using the UIR0 function code.
- ER&R will continue to deliver UIR Reports using the UIR9 function code for the remaining 2019 RCNO runs.

Uneven Matches and Leftover Records

- An **uneven match** occurs when the issuer and FFM have a different number of records for an enrollment group for the same period of coverage; the matched records in this scenario will have an E or P overall record flag in the RCNO file
 - E Flag** - uneven match; at least one (1) field marked for issuer update and one (1) or more fields marked for FFM update; however, due to uneven matching of records for the individual member, FFM updates will not be applied in this cycle
 - P Flag** - uneven match; no issuer updates required, but one (1) or more fields marked for FFM update; however, due to uneven matching of records for the individual member, FFM updates will not be applied in this cycle
- A **leftover record** is the extra record(s) remaining after an uneven match between FFM and issuer records; these records receive an R or G overall record flag in the RCNO file
 - G Flag** - leftover FFM record; after determining best match for all records for the individual member, an unmatched record remains on FFM side with no additional issuer records
 - R Flag** - leftover issuer record; after determining best match for all records for the individual member, an unmatched record remains on issuer side with no additional FFM records

	FFM Benefit Start Date	Issuer Benefit Start Date	Start Date Record Flag	FFM Benefit End Date	Issuer Benefit End Date	End Date Record Flag	Overall Record Flag
Uneven Record	1/1/2019	1/1/2019	M	1/31/2019	12/31/2019	F	P
Leftover Record	2/1/2019			12/31/2019			G

Persistent F and I Field-Level Flags

- A field-level flag of F indicates that the FFM will update the FFM value to match to the issuer value, but if the record is uneven no updates will be applied
NOTE: If the issuer addresses the uneven match, the field containing the F flag will be eligible for update in the subsequent RCNO run.
- A field-level flag of I indicates that the issuer needs to update the issuer value to match the FFM value; issuers should carefully review fields flagged I on an uneven match to ensure any update made to their system would be appropriate despite the uneven match and submit any applicable disputes to ER&R.
- F and I flags are considered persistent when the field-level flag remains for two (2) or more RCNO runs.

RCNO Run	FFM Benefit Start Date	Issuer Benefit Start Date	FFM Benefit End Date	Issuer Benefit End Date	End Date Record Flag	FFM Total Premium	Issuer Total Premium	Overall Record Flag
11	1/1/2019	1/1/2019	8/31/2019	8/31/2019	M	1000	1000	M
11	9/1/2019	9/1/2019	9/30/2019	12/31/2019	F	1300	1300	P
11	10/1/2019		12/31/2019			1200		G
12	1/1/2019	1/1/2019	8/31/2019	8/31/2019	M	1000	1000	M
12	9/1/2019	9/1/2019	9/30/2019	12/31/2019	F	1300	1300	P
12	10/1/2019		12/31/2019			1200		G

Impact of Uneven Records

- Wherever possible, issuers should work to resolve instances where their extract process generates a different number of records for a given policy than what is on the FFM side.
- Since no updates can be made to uneven records through Recon, policies with a persistent uneven match often contain incorrect or outdated information.
 - If uneven records are not resolved, F field-level flags will persist within the records.
- Failure to reconcile persistent F and I field-level flags may cause:
 - Consumers to receive incorrect initial 1095-A forms.
 - Consumers to file taxes incorrectly or delay filing taxes.
 - Issuers to receive additional verification requests as part of case research by the 1095-A team.
 - Issuers to receive incorrect payments.

Common Scenarios: Overall Record G Flags

- Fixing common overall record G flag scenarios:
 - If the FFM has multiple segments due to a Change in Circumstance (CIC) but the issuer has fewer segments, the issuer should update the next RCNI submission to match the FFM.
NOTE: Issuers should submit one (1) record per member per segment on RCNI submissions. For detailed information on aligning segments and when CICs result in new segments, refer to the **FFM Enrollment Data Structure** section within the Enrollment Reconciliation Education Suite.
 - If an issuer has a HICS case or other legitimate business reason for having fewer records than the FFM, the issuer should take the appropriate action, typically submitting an Enrollment Dispute or HICS Direct Dispute, to ensure a successful even-sided match in future cycles.
- If the uneven record contains #MERGE in the Footnotes field, refer to the Enrollment Reconciliation Education Suite for more information on how CMS merges multiple FFM records into a single record.

Common Scenarios: Overall Record R Flags

- Fixing common overall record R flag scenarios:
 - If the record is for a dependent that was removed from coverage on that segment via M834 Transaction, the issuer should discontinue submitting the dependent record.
 - If the FFM is missing a legitimate dependent record, the issuer should instruct the consumer to contact the Marketplace to add the dependent.
 - If the issuer correctly created an additional segment based on a CIC and the FFM did not (due to an Enrollment Blocker), the issuer should take the appropriate action, typically submitting an Enrollment Dispute or HICS Direct Dispute, to update the FFM with the CIC so that the additional segment will be present in future cycles.
- NOTE:** Issuers should refer to the Enrollment Blocker Cheat Sheet on zONE if an update is unable to be processed due to an Enrollment Blocker.

Uneven and Leftover Record Resources

- Issuers should access the following CMS zONE pages for more information about reconciling uneven and leftover records:
 - <https://zone.cms.gov/document/enrollment-data-reconciliation>
 - Enrollment Reconciliation Education Suite
 - <https://zone.cms.gov/document/enrollment-resolution-and-reconciliation>
 - Combined Enrollment and Payment Disputes TRG
 - Enrollment Blocker Cheat Sheet

Q&A

