

Enrollment Reconciliation & IC834 Workgroup



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January 16, 2020

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IC834 – Housekeeping

- **The PO-IC834 reporting suite** (PO Summary, PO Detailed, and Reinstatement Detailed) for transactions submitted from 1/7 – 1/13 was sent out yesterday.
- If you have any questions about these reports or any other IC834-related item, please contact Inbound834@bah.com

IC834 – Tips for PY2020

- **Issuers are encouraged to include only the fields that are required and validated on an IC834 transactions.**
 - This ensures that other fields, e.g. financials, are not rejected at EDI due to format or schema errors
- **Review the weekly OP834T and monthly Pre-Audit file to determine the latest status of the policy at FFM prior to generating IC834 transactions**
 - This will avoid E025 (duplicate) or E095 (out of sequence) errors due to outdated policy information that may exist in Issuer systems
- **Use the reference table on CMS zOne (also available on the next slide) to include the appropriate maintenance code combination on IC834 transactions to ensure it reflects the intended status change (e.g. effectuation, termination, maintenance, etc.)**
 - Successful IC834 transactions result in an update to the FFM without any manual review for validity of the information sent, so it is critical that the maintenance codes reflect the appropriate transaction type

Valid IC834 Code Combinations

The table below provides valid combinations of Maintenance Type Codes (MTCs), Maintenance Reason Codes (MRCs), and Additional Maintenance Reason Codes (AMRCs) to determine a transaction type for IC834 transactions. The **highlighted row** is new as of Fall 2019.

IF Maintenance Type Code (INS03)	AND Maintenance Reason Code (INS04)	AND Additional Maintenance Reason Code (2750 Loop)	THEN Transaction Type (derived by FFM)
021	28	CONFIRM	EFFECTUATION
024	59	CANCEL	CANCELLATION
024	14	CANCEL-FLC	CANCELLATION
024	07	CANCEL-FRD	CANCELLATION
024	07	CANCEL-RESCIND	CANCELLATION
024	59	TERM	TERMINATION
024	NULL	CANCEL-OTH	CANCELLATION
024	26	CANCEL-HICS	CANCELLATION
024	NULL	TERM-OTH	TERMINATION
024	26	TERM-HICS	TERMINATION
001	25	ISSUER MAINT	MAINTENANCE
001	NULL	NO CHANGE	MAINTENANCE
025	NULL	ISSUER – REINSTATEMENT	REINSTATEMENT
024	NULL	CANCEL-ANTIDUPLICATION	CANCELLATION
024	NULL	TERM-ANTIDUPLICATION	TERMINATION
024	NULL	CANCEL-OUT-OF-AREA	CANCELLATION

prosecution to the full extent of the law.

IC834 Resources

REFERENCE GUIDES

- **ASCX12 X12N/005010X220 Type 3 Technical Report (TR3)**
 - Reference guide for data submission of health care industry enrollment and maintenance transactions
- [ASC X12 834 Companion Guide](#) (Companion Guide – **Recently updated**)
 - Use in conjunction with the TR3 for Marketplace-specific implementation, including the creation of IC834 transactions
- [FFM Maintenance 834 Operations Manual](#) (**Recently updated**)
 - Use for guidance when preparing and processing enrollments involving a CIC

OTHER RESOURCES

- [CMS zONE IC834 Site](#) – includes the IC834 Education Suite:
 - [IC834 101](#) – *Overview of Inbound834*
 - [IC834 201](#) – *Preparing and Submitting Inbound834s*
 - [IC834 301](#) – *Troubleshooting and Resolving Rejections*

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2016**
 - This month's 2016 FFM extract was taken on Monday, January 13th at 6PM EST
 - Comprehensive 2016 Pre-Audit (AUD16) Files based upon that extract were delivered to Issuers yesterday, Wednesday, January 15th
- **Plan Year 2017**
 - This month's 2017 FFM extract was taken yesterday, 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 was taken yesterday, 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 was taken yesterday, 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 was taken yesterday, 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 5.11)
 - 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 5.11 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
- **Please Note:** Last week v5.1 was published; the only additional changes in v5.11 are an update to the publication date and the change log

Cancellation/Termination Reason Code Reminders

- CMS continues to analyze the Cancellation and Termination Reason Codes submitted by Issuers in monthly Enrollment Reconciliation
- Two issues have been seen frequently in the RCNI data submitted for December's Run 13 for PY2019
 - **Submission of FFM-Only Reason Codes:** Reason Codes 1-5 and 13 can only be initiated on the FFM side; many Issuer records have been submitted with one of these reason codes where no reason code is present on the FFM side
 - Issuers are only allowed to submit codes 1-5 or 13 when that code has been sent by the FFM when cancelling or terminating that enrollment
 - **Submission of Termination Reason Codes on Policies with a 12/31 End Date:** Many policies have been submitted on the RCNI File with a Termination Reason Code although the end date of the policy has been submitted as 12/31/2019
 - Issuers should only include a Termination Reason Code on a policy ending 12/31 of the plan year if they have received a termination transaction from the FFM that indicates the member should be termed as of the end of the year (i.e. BAR Opt Out)
 - Once Issuers initiate terminations for non-payment back to 12/31/2019 for members continuing coverage into 2020, Reason Code 6 can be submitted to indicate non-payment however it is not expected that would have occurred prior to December reconciliation

2019 Reinstatements After BAR

- CMS has identified consumers whose 2019 health plan enrollments were reinstated through Reconciliation or disputes after BAR ended but who are not enrolled in a 2020 health plan.
 - CMS is tagging the consumer's Marketplace account with an SEP to allow them to enroll in 2020 coverage. Enrollees who want to access the SEP must contact the FFM Call Center.
 - Issuers with enrollees who enroll under the SEP will get an 834 transaction with a prospective date (and potentially a HICS case to make it retroactive to January 1, 2020, at enrollee's option).
 - ER&R will send an EFT file to issuers who are impacted on **Monday, January 27**, along with an email communication including the filename.
 - The EFT file will include policies reinstated both through Reconciliation and disputes.
 - The EFT file will be transmitted using the IOUTRC function code.
 - Issuers are encouraged to complete outreach and notify the consumers that they may contact the FFM Call Center to enroll in a 2020 plan.

2019 Reinstatements After BAR (Cont.)

- CMS recommends including the following messaging in any issuer outreach:
 - Due to a processing error, the Health Insurance Marketplace does not have a complete application record for your 2020 healthcare plan.
 - You **MUST** complete a new 2020 Marketplace application to get 2020 coverage.
 - Call the Marketplace **by March 27** to complete a new 2020 application. You are eligible to enroll through a Special Enrollment Period, but you can only access this Special Enrollment Period by calling the Health Insurance Marketplace at **1-800-318-2596**.
 - If you want to stay in your 2019 plan, select <insert plan name and plan ID>. You can select a coverage start date in the future or a start date retroactive to January 1st 2020.
 - To complete your 2020 application quicker and easier, gather income information for everyone in your household before you call. The Marketplace needs this information to make sure you get the right eligibility and cost information.
 - For more information on applying, visit www.healthcare.gov/apply-and-enroll/get-ready-to-apply/.
- Consumers who are already enrolled in a 2020 plan will not be included in this process.
- ER&R will deliver the EFT files to issuers using the IOUTRC function code and format. Issuers can locate file specifications for the IOUTRC format on zONE at <https://zone.cms.gov/document/ioutrc-file-layout>.
- In March, ER&R will send a final file listing the qualifying 2019 reinstatements processed in Reconciliation and disputes.

Reminder: 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

Reminder: 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>.

Q&A

