

Enrollment Reconciliation & IC834 Workgroup



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IC834 – Housekeeping

- **The PO-IC834 reporting suite** (PO Summary, PO Detailed, and Reinstatement Detailed) for transactions submitted from 2/11 – 2/17 was sent out yesterday.
- If you have any questions about these reports or any other IC834-related item, please contact Inbound834@bah.com

Primary & Secondary Matching

- **Primary Matching** is the initial validation to ensure the policy and the required action can be identified. The following items are checked:
 - 4 key fields (QHP ID, Policy ID, Benefit Begin Date and Exchange Assigned Subscriber ID)
 - Valid requested policy status update
 - Submission of the required fields
- Once Primary Matching passes, **Secondary Matching** validation checks for the following:
 - Additional business rules including unique (non-duplicate) submissions and valid dates
 - Presence of all other critical fields

Secondary Matching - E095 Error Code

- E095 errors are one type of secondary matching BAA Error code
- This error code indicates a business process transaction out of sequence. In other words, it indicates one of the following scenarios:
 - Termination IC834 transaction sent for a Cancelled FFM Policy
 - Effectuation IC834 transaction sent for a Cancelled FFM Policy
 - Maintenance IC834 transaction sent for a Cancelled or Non-Effectuated FFM Policy

Secondary Matching – Resolving E095 Error Code

- To reduce the possibility of receiving E095 errors, we suggest the following steps:
 - 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 This helps avoid E095 errors due to outdated policy information that may exist in your system.

Housekeeping: Pre-Audit & Reconciliation

- **Prior Plan Years (2014-2019)**
 - The next set of 1095-A Consumer-Initiated Dispute Update (1095Ax) Files are scheduled to be distributed to Issuers today, Thursday, February 20th
- **Plan Year 2015**
 - A full 2015 FFM extract was taken on Thursday, February 13th at 6PM EST
 - Comprehensive 2015 Pre-Audit (AUD15) Files based upon that extract were distributed to Issuers on Tuesday, February 18th
- **Plan Year 2017**
 - This month's 2017 FFM extract was taken on Saturday, February 15th at 6PM EST
 - Incremental 2017 Pre-Audit (ISIPA7) Files based upon that extract are scheduled to be distributed to Issuers today, Thursday, February 20th
- **Plan Year 2018**
 - This month's 2018 FFM extract was taken on Saturday, February 15th at 6PM EST
 - Incremental 2018 Pre-Audit (ISIPA8) Files based upon that extract are scheduled to be distributed to Issuers today, Thursday, February 20th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2019**

- This month's 2019 FFM extract was taken on Saturday, February 15th at 6PM EST
- Comprehensive 2019 Pre-Audit (AUD9) Files based upon that extract were delivered to Issuers yesterday, Wednesday, February 19th
- The RCNI9 submission deadline for February's Run 15 is **today, February 20th at 3PM EST**
 - **As of noon today, just under 90% of Issuers have successfully submitted for Run 15**
 - RCNO9 Files for Run 15 will be distributed to participating Issuers on Tuesday, February 25th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2020**

- This month's 2020 FFM extract was taken on Saturday, February 15th at 6PM EST
- Comprehensive 2020 Pre-Audit (AUD0) Files based upon that extract were distributed to Issuers yesterday, Wednesday, February 19th
- The RCN10 submission deadline for February's Run 3 is **Thursday, February 27th at 3PM EST**
 - RCN00 Files for Run 3 will be distributed to participating Issuers on Tuesday, March 3rd

Recon Outreach: Reason Codes

- In Fall 2019, CMS and the Recon Team launched an Issuer outreach initiative regarding **Cancellation and Termination Reason Codes**
- As a reminder, Issuers are expected to provide Cancellation and Termination Reason Codes on the RCNI File when the Issuer has initiated the policy-level cancellation or termination
 - Issuers may also optionally echo back Cancellation and Termination Reasons on FFM-initiated policy-level cancels and terms
- In January, CMS implemented field-level flag **U** on the Cancellation and Termination Reason Code fields on the RCNO File to indicate when the field **has not** been populated per established technical guidance

Recon Outreach: Reason Codes

- **Outreach:** The Recon Team has initiated outreach to Issuers with a high number of records on the RCNO File with a Cancellation or Termination Reason Code field-level flag value of **U**
 - Prior to January these records were identified via CMS analysis of the RCNO Files but did not have the field-level flag **U** present on the RCNO File
- **Expected Issuer Actions:** If your organization receives outreach related to Cancellation and Termination Reason Codes, it is expected that you will:
 - Review the U flags for Cancellation and/or Termination Reason Codes on your RCNO File to identify scenarios in which the proper value is not being populated on the RCNO File
 - Review the Enrollment Reconciliation Education Suite (available on zONE at: <https://zone.cms.gov//document/enrollment-data-reconciliation>) for guidance on proper population of the Cancellation and Termination Reason Codes
 - Reply to the outreach e-mail to:
 - Ask questions on any scenarios where you are not clear on how to properly populate the reason codes and/or
 - Provide an expected timeline by which you expect to resolve any issues referenced in the e-mail

UIR Report Delivery

- ER&R will deliver the first UIR Reports for 2020 policies on Friday, February 21, for RCNO Run 2 using the new **UIR0** function code.
- ER&R delivered the RCNO Run 14 UIR Reports for 2019 policies on Friday, February 14, using the **UIR9** function code.

NOTE: Only issuers with UIRs in that RCNO run will receive UIR Reports.

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 and UIR TRG on CMS zONE at <https://zone.cms.gov/document/enrollment-resolution-and-reconciliation>.

EAPS Report Updates – Planned Release Changes for February 2020

- FMCC is planning to release changes to the February EAPS report
- Changes noted on following slides will be released with this month's report.
- February EAPS reports are scheduled to be released next week
- Please contact FMCC@cms.hhs.gov if you have any questions about the EAPS report.

EAPS Report Updates (1 of 3)

- **Applied to PY20 Versions ONLY:**
 - Added Payment Disputes and Persistent 'I' flag metrics (please refer to the glossary tab in the EAPS report for information on these two metric)
 - Additional metrics for PY20 will continue to be phased into the report in March and April.
- **Added to PY19 & PY20 Versions ONLY:**
 - *Changes to Recon Quality metric to be in sync with recent changes made to the Enrollment Recon business rules that took effect in January.*

EAPS Report Updates (2 of 3)

Example of Summary Score tab for PY20 – New Metrics Added

Parent Company							
Parent Company							
HIOS ID	Issuer Organization	State	Enrollment Reconciliation	Enrollment Reconciliation	Disputes	Disputes	Persistent I Flags
			Feb-20	Change from Jan-20	Feb-20	Change from Jan-20	Feb-20
11111	Issuer 1	VA	✓	➡	✓	➡	✓
22222	Issuer 2	IN	✓	➡	✓	➡	✓
33333	Issuer 3	OH	✓	➡	✓	➡	⚠
44444	Issuer 4	MO	✓	➡	✓	➡	✗
55555	Issuer 5	KY	✓	➡	✓	➡	⚠
66666	Issuer 6	ME	✓	➡	✓	➡	✗

Example of Detailed Metrics tab for PY20 – New Metrics Added

Parent Company						
Parent Company						
HIOS ID	Issuer Organization	State	Payment Dispute Submission	Payment Dispute Success Rate	Payment Dispute Volume	
			Feb-20	Feb-20	Feb-20	
11111	Issuer 1	VA	Submitted YTD	✓ 100%	0.0%	
22222	Issuer 2	IN	Did Not Submit	Did Not Submit	0.0%	
33333	Issuer 3	OH	Submitted Recent	✓ 100%	0.3%	
44444	Issuer 4	MO	Submitted Recent	✓ 94%	0.5%	
55555	Issuer 5	KY	Submitted YTD	✓ 100%	0.1%	
66666	Issuer 6	ME	Submitted Recent	✓ 100%	0.8%	

Parent Company									
Parent Company									
HIOS ID	Issuer Organization	State	Plan Benefit End Date Persistent I Flag Policy Count	Plan Benefit End Date Percent of HIOS Policies	Plan Benefit Start Date Persistent I Flag Policy Count	Plan Benefit Start Date Percent of HIOS Policies	Applied APTC Amount Persistent I Flag Policy Count		
			Feb-20	Feb-20	Feb-20	Feb-20	Feb-20		
11111	Issuer 1	VA	10	⚠ 0.26%	0	✓ 0.00%	0		
22222	Issuer 2	IN	2	✓ 0.08%	0	✓ 0.00%	0		
33333	Issuer 3	OH	11	✓ 0.14%	3	✓ 0.04%	8		
44444	Issuer 4	MO	122	✗ 0.52%	14	✓ 0.06%	60		
55555	Issuer 5	KY	5	⚠ 0.48%	0	✓ 0.00%	0		
66666	Issuer 6	ME	135	⚠ 0.40%	30	✓ 0.09%	89		

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EAPS Report Updates (3 of 3)

- **Recon Quality Metric Changes:**

- A change took effect in January with how CMS evaluates issuers' RCNI data, which will change the values conveyed in the Recon Quality metric in the EAPS report to align to this change (will take effect with the February EAPS report whose metrics reflect PY20 Run 2 and PY19 Run 14)
- Recon Quality metrics conveyed in all prior cycles will not change.

- **Recon Quality – New Values:**

- "Fully Successful" - Issuer has no data suppressed and is eligible for cancellations and full field-level updates to be applied.
- "Suppressed for Cancels only" - Issuer has cancellations suppressed and is eligible for full field-level updates to be applied.
- "Fully Suppressed" - Issuer is not eligible for any updates to be applied on FFE.

Q&A

