

Enrollment Reconciliation & IC834 Workgroup



✓ **IC834**

- Housekeeping
- Reminder—Submit IC834s by the 13th for Pre-Audit
- IC834 Error Code Review
 - E051 Errors
 - E046 Errors

✓ **Recon**

- Housekeeping
- Reminder: Alignment of RCNI to FFM Extract Date
- Cancellation Reason Codes

✓ **ER&R**

- 2020 Run 2 UIR Report Delivery Delay
- 2019 Policies: Prior Year and Account Manager Approval

✓ **Q&A**

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IC834 – Housekeeping

- **The PO-IC834 reporting suite** (PO Summary, PO Detailed, and Reinstatement Detailed) for transactions submitted from 2/25 – 3/2 was sent out yesterday.
- If you have any questions about these reports or any other IC834-related item, please contact Inbound834@bah.com

Reminder – Submit IC834s by the 13th for Pre-Audit

- We encourage issuers to submit IC834 transactions by the end of the day on March 13th (as possible given business constraints).
- Since the Pre-Audit file runs on the 15th, submitting by the 13th provides sufficient time for processing between submission and when the Pre-Audit file is run. This helps ensure these transactions are reflected on the monthly Pre-Audit files.

IC834 Error Code Review

- Each week, the IC834 team looks at the most frequently occurring error codes for IC834 transactions.
- This week we will focus on the E051 and E046 error codes.

E051 Errors

The E051 error code signifies rejection **when a transaction is out of sequence and does not follow date processing rules:**

BAA Error Codes				Rejection Reasons
Error Code	Error Reason	Element in Error	Modified Data Content	
E051	Incorrect Date	Benefit Begin Date	FFM Benefit Begin Date	Cancellation IC834 transaction sent with Benefit End date not equal to Benefit Begin date OR Benefit Begin date - 1
E051	Incorrect Date	Eligibility End Date	FFM End Date	Termination IC834 transaction sent for a Terminated FFM Policy (IC834 Term date > FFM Term Date)
E051	Incorrect Date	Eligibility End Date	FFM Benefit Begin Date	Termination IC834 transaction sent where Benefit End Date < Benefit Begin Date

E051 Errors – Example Scenario

Issuer sends the IC834 below and receives an E051 error

- Incorrect Eligibility End Date

FFM Outbound I834	Issuer Outbound IC834
ISA*00* *00* *ZZ* CMSFFM *ZZ* 120674828V GS*BE* VA0*12028VA0120028*20160809*1631*1002*X*005010X220A1 ST*834*0200*005010X220A1 BGN*00*0200*20160809*132006*ET***2 QTY*TO*2 QTY*DT*1 N1*P5*Awesome Guy*FI*123456789 N1*IN*JMLoadTest2184*FI*460674828 INS*Y*18*024*59*A***TE REF*0F*0000500029 REF*17*0000500029 DTP*356*D8*20160201 * DTP*348*D8*20160201	ISA*00* *00* *ZZ*120674828V *ZZ*CMSFFM GS*BE*12028VA0120028*VA0*20160809*1631*1001*X*005010X220A1 ST*834*0001*005010X220A1 BGN*00*0001*20160809*132006*ET***2 QTY*TO*2 QTY*DT*1 N1*P5*Awesome Guy*FI*121212122 N1*IN*JMLoadTest2184*FI*460674828 INS*Y*18*024*59*A***TE REF* DTP*357*D8*20160101 *

- What is the error in the IC834 file?
 - In the I834, the BenefitBeginDate 20160201 and in the IC834, End date is 20160101. Issuer must respond with correct EligibilityEndDate.

I834 20160201 VS IC834 20160101



Incorrect EligibilityEndDate

E046 Errors

E046 indicates a variety of secondary field mismatches, including the following.

To ensure successful transactions, please be mindful of the following:

- Ensure the Eligibility End Date on an IC834 transaction = Eligibility Begin Date of the policy
- Persist the correct Sponsor TPID from the I834 received from the FFM

BAA Error Codes				Rejection Reasons
Error Code	Error Reason	Element in Error	Modified Data Content	
E046	Not Matching	Eligibility Begin Date	FFM Eligibility Begin Date	Effectuation or Maintenance IC834 transaction sent for IC834 Eligibility Begin date not equal to FFM Policy Eligibility Begin date
		Sponsor Tax Payer Identification Number	FFM Sponsor Other Identifier	Invalid (Sponsor) Taxpayer Identification Number

Housekeeping: Pre-Audit & Reconciliation

- **Prior Plan Years (2014-2019)**
 - 1095-A Consumer-Initiated Dispute Update (1095Ax) Files were delivered to Issuers yesterday, Wednesday, March 4th
 - The next set of 1095Ax Files is scheduled for delivery to Issuers on Wednesday, March 18th
- **Plan Year 2014**
 - A full 2014 FFM extract will be taken on Friday, March 13th at 6PM EDT
 - Comprehensive 2014 Pre-Audit (OTPAUD) Files based upon that extract are scheduled for distribution to Issuers on Tuesday, March 17th
- **Plan Year 2017**
 - This month's 2017 FFM extract will be taken on Sunday, March 15th at 6PM EDT
 - Incremental 2017 Pre-Audit (ISIPA7) Files based upon that extract are scheduled for delivery to Issuers on Wednesday, March 18th
- **Plan Year 2018**
 - This month's 2018 FFM extract will be taken on Sunday, March 15th at 6PM EDT
 - Incremental 2018 Pre-Audit (ISIPA8) Files based upon that extract are scheduled for delivery to Issuers on Wednesday, March 18th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2019**

- This month's 2019 FFM extract will be taken on Sunday, March 15th at 6PM EDT
- Comprehensive 2019 Pre-Audit (AUD9) Files based upon that extract are scheduled for distribution to Issuers on Tuesday, March 17th
- The RCNI9 submission deadline for March's Run 16 is Thursday, March 19th at 3PM EDT
 - RCNO9 Files for Run 16 will be distributed to participating Issuers on Tuesday, March 24th
 - **Reminder:** *Run 16 is the final scheduled reconciliation cycle for PY2019!*

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2020**

- The RCNIO submission deadline for February's Run 3 was last Thursday, February 27th at 3PM EST
 - RCNO0 Files for Run 3 were distributed to Issuers on Tuesday, March 3rd
- This month's 2020 FFM extract will be taken on Sunday, March 15th at 6PM EDT
- Comprehensive 2020 Pre-Audit (AUD0) Files based upon that extract are scheduled for distribution to Issuers on Tuesday, March 17th
- The RCNIO submission deadline for March's Run 4 is Thursday, March 26th at 3PM EST
 - RCNO0 Files will be distributed to participating Issuers on Tuesday, March 31st

Reminder: Alignment of RCNI to FFM Extract Date

- Since enrollment reconciliation processing was initiated for PY2020, CMS has seen that the majority of Issuers are submitting 2020 Inbound Enrollment Reconciliation (RCNI0) Files with an Issuer Extract Date well after the FFM Extract Date for the month
- This causes timing discrepancies where the RCNI0 File contains records reflecting transactions that occurred after the FFM Extract but prior to the Issuer's RCNI Extract for the month
 - In these cases this will result in an uneven match in reconciliation and no updates will be made to those records
 - This will also cause an increase in flags warranting Issuer attention, solely due to timing discrepancies
- Issuers should make every effort to ensure the RCNI file submitted for each cycle reflects the state of the Issuer's enrollment data as of the time you process any 834 transactions on the FFM Extract Date (typically the 15th of the month)
 - For example, if the Issuer typically processes 834s from the FFM the business day after receipt, the Issuer should run their RCNI extract process late on the 16th (after the 834s have been applied from the 15th) or on the 17th to minimize potential timing discrepancies

Cancellation Reason Codes

- CMS continues to analyze Issuer Cancellation and Termination Reason Codes submitted on the RCNI Files
- For PY2020 in Run 3:
 - Of cancels that would be newly applied to the FFM based upon the RCNI File:
 - **13.0%** did not have an Issuer Cancellation Reason Code provided on the cancelled enrollment record
 - **3.1%** had an invalid Issuer Cancellation Reason Code provided
 - Invalid Cancellation Reason Codes submitted include:
 - » **06** – Leading zeroes should not appear on reason codes
 - » **1** – Indicates voluntary cancellation and should only be initiated on the FFM side

2020 Run 2 UIR Report Delivery Delay

- On 02/21/2020, ER&R sent Unmatched "I" Record (UIR) Reports for RCNO Run 2 to impacted issuers using the **UIRO** function code. This transmission failed, and the applicable issuers did not receive the files.
- ER&R corrected the issue and retransmitted the UIR Reports on 03/03/2020.
- ER&R also sent notification of file transmission and the new filename to the designated ER&R contact person for each issuer via email.
NOTE: Only issuers with UIRs present in Run 2 RCNO data received the report.
- Issuers should refer to the UIR Master Guidance, which is available on zONE at <https://zone.cms.gov/document/enrollment-resolution-and-reconciliation>, for further details on addressing UIRs.
- Issuers who wish to modify their contact information or ask additional questions may contact the ER&R Support Center:
 - Email: ERRSupportCenter@cognosante.com
 - Phone: **(855) 591-7113**

2019 Policies: Prior Year and Account Manager Approval

- 2019 disputes are considered prior year starting April 1, 2020.
- When submitting disputes for 2019 records after April 1, 2020, issuers should:
 - Use the correct dispute type when changing end dates.
 - Refrain from using dispute types that are reserved for current year records.
 - Consider using the FFM Exchange Assigned Policy ID and Segment ID fields instead of the FFM Internal Record Inventory Number field.
- Starting on May 1, 2020, issuers will need to send completed Issuer Prior Year Approval Request Forms to their Account Managers to submit 2019 disputes to ER&R.
 - For more information regarding requesting Account Manager approval for Prior Year disputes or to download the request form, issuers should access the prioryeardisputeapprovalmasterguidance.pptx and issuerprioryearapprovalrequest_final_5.28.2019.xlsx files on zONE at <https://zone.cms.gov/document/enrollment-resolution-and-reconciliation>.

Q&A

