

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 3/3 – 3/9 *is delayed*.
- Reports are expected to be sent out by Saturday, March 14.
- 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

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.

Housekeeping: Pre-Audit & Reconciliation

- **Prior Plan Years (2014-2019)**
 - The next set of 1095-A Consumer-Initiated Dispute Update (1095Ax) Files is scheduled for delivery to Issuers on Wednesday, March 18th
- **Plan Year 2014**
 - A full 2014 FFM extract will be taken tomorrow, 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**

- 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

Update: Cancellation and Termination Reason Codes

- Currently, CMS is analyzing the reason codes submitted by Issuers on the RCNI Files each month to assess Issuer preparedness for full implementation of reason code updates via reconciliation
 - CMS is also performing detailed analysis for Issuers that are having difficulties providing the reason codes on the RCNI File
 - Each month e-mails are sent to these organizations with details on the issues found regarding reason code submission and recommendations on how to correct
 - Issuers should review all Cancellation Reasons and Termination Reasons that receive a field-level flag of **U**, as that indicates the value submitted (or left blank) is considered invalid
- CMS is planning to move to the next phase of implementation in **June 2020** – in this phase the FFE will be updated with the reason codes sent on the RCNI File per the established business rules
 - Issuers will have cancellations and terminations *suppressed* at that time if reason codes are not properly populated on the RCNI File
- If your team needs technical assistance regarding proper submission of reason codes in recon, please contact the Recon Issuer Support Team at recon_issuer_support@bah.com

Disputes Creating New Segment and Policy IDs

- ER&R received questions from issuers regarding the process for assigning new policy and segment IDs after submitting Enrollment Disputes or HICS Direct Disputes.
- CMS assigns new segment IDs following a qualifying Change in Circumstance, which includes changes to financial values, the enrollment group size, or the subscriber.
- CMS assigns new policy IDs less frequently, as policy IDs are typically generated to enforce a business rule. The most common scenarios that require new file IDs are the creation of a gap in coverage under a single policy ID and a change in tobacco use status that only affects certain segments within a single policy ID.
- Issuers must consult their next Pre-Audit file to identify the new ID number(s).
- CMS will populate the New Policy ID Indicator (field 100) on the Pre-Audit file with “1” if there is a new policy ID and segment ID and “2” if there is only a new segment ID.

NOTE: ER&R does not have a way to provide issuers with the new policy or segment IDs before the release of the Pre-Audit file.

Q&A

