

Enrollment Reconciliation & IC834 Workgroup



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April 09, 2020

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IC834 – Housekeeping

- **The PO-IC834 reporting suite** (PO Summary, PO Detailed, and Reinstatement Detailed) for transactions submitted from 3/31 – 4/6 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 April 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 are scheduled for distribution to Issuers on Wednesday, April 15th
- **Plan Year 2016**
 - An incremental 2016 FFM extract is scheduled for Monday, April 13th at 6PM EDT
 - Incremental 2016 Pre-Audit (ISIPA6) Files based upon that extract are scheduled for delivery to Issuers on Wednesday, April 15th
- **Plan Year 2017**
 - This month's 2017 FFM extract is scheduled for Wednesday, April 15th at 6PM EDT
 - Incremental 2017 Pre-Audit (ISIPA7) Files based upon that extract are scheduled for delivery to Issuers on Monday, April 20th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2018**

- This month's 2018 FFM extract is scheduled for Wednesday, April 15th at 6PM EDT
- Comprehensive 2018 Pre-Audit (AUD8) Files based upon that extract are scheduled for delivery to Issuers on Monday, April 20th

- **Plan Year 2019**

- This month's 2019 FFM extract is scheduled for Wednesday, April 15th at 6PM EDT
- Comprehensive 2019 Pre-Audit (AUD9) Files based upon that extract are scheduled for delivery to Issuers on Friday, April 17th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2020**

- This month's 2020 FFM extract is scheduled for Wednesday, April 15th at 6PM EDT
- Comprehensive 2020 Pre-Audit (AUD0) Files based upon that extract are scheduled for delivery to Issuers on Friday, April 17th
- The RCNIO submission deadline for April's Run 5 is Thursday, April 23rd at 3PM EDT
 - RCNO0 Files from Run 5 are scheduled for distribution to Issuers on Tuesday, April 28th

Data Cleanup to Cancel Inadvertent Prior Year Enrollments

- This week, several Issuers reported receipt of new Initial 834 transactions for prior plan years 2017, 2018, and/or 2019
- CMS identified an internal issue that caused a small number of new prior year enrollments to be sent to Issuers in error and have applied a data cleanup to cancel these inadvertent enrollments
- CMS plans to communicate these cancellations to Issuers via Incremental Pre-Audit Files **tomorrow, Friday, April 10th**
 - The files will be sent to impacted Issuers via MISC7 (PY2017), MISC8 (PY2018), and MISC9 (PY2019) function codes
 - Issuers that do not have impacted enrollments for any given plan year will not receive the corresponding Incremental Pre-Audit File
 - Impacted Issuers will receive a message from CMS Issuer Communications for each plan year for which they will receive a file

Data Cleanup to Cancel Inadvertent Prior Year Enrollments

- **Issuer Actions:**

- Issuers should apply the cancellations reflected in the MISC7, MISC8, and MISC9 Files
- **Reminder:** Issuers are sent legitimate enrollment transactions for prior plan years and must ensure that *only* the inadvertent policies included in the MISCx Files are cancelled due to this cleanup
 - Issuers receive prior year enrollments as a result of appeals; these are sent with an Application Origin Type Code of **18** on the I834 transaction
 - Issuers may also still receive legitimate 2019 enrollments that had a SEP Verification Issue (SVI) that was resolved after an extension into 2020

Prior Year and Account Manager Approval for 2019 Policies

- 2019 disputes are considered prior year as of April 1, 2020.
- ER&R received a significant number of 2019 end date disputes using the *Issuer End Date Later than FFM* or *Issuer End Date Earlier than FFM* dispute types. Issuers must submit prior year end date disputes using the *Prior Year – End Date* option on the Discrepancy Dispute tab.
- Starting on May 1, 2020, each issuer will need to send a completed Issuer Prior Year Approval Request Form to their Account Manager (AM) before submitting 2019 disputes to ER&R.
 - ER&R will present more details regarding the AM approval process on a later date.
 - Disputes associated with HICS cases do not require AM approval.
 - For more information regarding AM approvals, issuers should access the Prior Year Dispute Approval Master Guidance on zONE at <https://zone.cms.gov/document/enrollment-resolution-and-reconciliation>.

Q&A

