

Enrollment Reconciliation & IC834 Workgroup



✓ **IC834**

- Housekeeping
- Reminder–Submit IC834s by the 13th for Pre-Audit
- IC834 Outreach & Communications Overview

✓ **Recon**

- Housekeeping
- Updated Recon Calendar Posted to zONE
- Cancellation/Termination Reason Code Updates
- Proper Use of Termination Reason Codes

✓ **ER&R**

- Tobacco Status Dispute Updates

✓ **Q&A**

June 11, 2020

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IC834 – Housekeeping

- **The PO-IC834 reporting suite** (PO Summary, PO Detailed, and Reinstatement Detailed) for transactions submitted from 6/2 – 6/8 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 June 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 Outreach & Communications Overview

- The IC834 Team regularly sends out communications to issuers for items such as low transaction success or other ad-hoc IC834 transaction concerns.
- Our intention is for outreach to be informative and used for awareness in case an issue was not previously known or identified. We do not intend for this information to be punitive.
- If you receive one of these communications, please let us know if the issue is known and if a fix is ongoing or is expected by a certain date.
- This acknowledgement and information helps for tracking purposes. We will note this information and the correction date so we reach out at appropriate intervals and not before a fix is implemented.

Housekeeping: Pre-Audit & Reconciliation

- **Prior Plan Years (2014-2019)**
 - The next set of 1095-A Consumer-Initiated Dispute Update (1095Ax) Files is scheduled for distribution on Wednesday, June 17th
- **Plan Year 2014**
 - An incremental 2014 FFM extract is scheduled for Friday, June 12th at 6PM EDT
 - Incremental 2014 Pre-Audit (ISIPA4) Files based upon that extract are scheduled for delivery to Issuers on Tuesday, June 16th
- **Plan Year 2017**
 - This month's 2017 FFM extract will be taken on Monday, June 15th at 6PM EDT
 - Comprehensive 2017 Pre-Audit (AUD17) Files based upon that extract are scheduled for distribution to Issuers on Thursday, June 18th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2018**

- This month's 2018 FFM extract will be taken on Monday, June 15th at 6PM EDT
- Incremental 2018 Pre-Audit (ISIPA8) Files based upon that extract are scheduled for distribution to Issuers on Thursday, June 18th

- **Plan Year 2019**

- This month's 2019 FFM extract will be taken on Monday, June 15th at 6PM EDT
- Comprehensive 2019 Pre-Audit (AUD9) Files based upon that extract are scheduled for distribution to Issuers on Wednesday, June 17th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2020**

- This month's 2020 FFM extract will be taken on Monday, June 15th at 6PM EDT
- Comprehensive 2020 Pre-Audit (AUD0) Files based upon that extract are scheduled for distribution to Issuers on Wednesday, June 17th
 - **Please Note:** The first SADP Effectuation process for 2020 was run this week and will be reflected in these AUD0 Files
- The RCNIO submission deadline for June's Run 7 is Thursday, June 18th at 3PM EDT
 - RCNO0 Files from Run 7 are scheduled for distribution to Issuers on Tuesday, June 23rd

Updated Recon Calendar Posted to zONE

- On Friday, June 5th, CMS published an update to the Pre-Audit and Reconciliation Calendar, including file delivery dates and reconciliation deadlines through September 2020
 - These updated documents are available on zONE at:
 - <https://zone.cms.gov/document/pre-audit-and-recon-calendar-and-file-specification>
- CMS is working to finalize the recon calendar for the remainder of calendar year 2020, including Open Enrollment (OE) 2021, and will publish following publication of the 2021 OE Transaction Summary

August 2020

Sun	Mon	Tues	Wed	Thurs	Fri	Sat
26	27 ER&R Dispute Submissions Due	28 Delivery to Issuers: • 2020 RCNO File	29 Delivery to Issuers: • 1095A Dispute Correction IPA Files	30	31 HIX 820 Delivery (06/15/20 FFM Extract)	August 1st
2	3	4	5	6	7	8
9	10	11	12 <i>IC834 Submission Due (@ 12:00am EST for 2019 calendar year policies)</i> Delivery to Issuers: • 1095A Dispute Correction IPA Files	13 2015 Incremental Pre-Audit Extract (6:00 pm ET)	14	15 FFM Updated 2020 2020, 2018 Pre-Audit Extract (6:00 pm ET) 2019,2017 Incremental Pre-Audit Extract (6:00 pm ET)
16	17 Delivery to Issuers: • 2015 Incremental Pre-Audit File	18 Delivery to Issuers: • 2020 Pre-Audit File Delivery to Issuers: • 2019 Incremental Pre-Audit File	19 Delivery to Issuers: • 2018 Pre-Audit File Delivery to Issuers: • 2017 Incremental Pre-Audit File	20 2020 RCNI Due 3pm Treasury Payment	21	22
23	24 ER&R Dispute Submissions Due	25 Delivery to Issuers: • 2020 RCNO File Data Matching Outreach File	26 Delivery to Issuers: • 1095A Dispute Correction IPA Files	27	28	29



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September 2020

Sun	Mon	Tues	Wed	Thurs	Fri	Sat
30 HIX 820 Delivery (07/15/20 FFM Extract)	31	September 1st	2	3	4	5
6	7 Labor Day	8	9 Delivery to Issuers: • 1095A Dispute Correction IPA Files	10	11 2014 Incremental Pre-Audit Extract (6:00 pm ET) PPR Delivery 08/15/20 FFM Extract	12
13	14	FFM Updated 2020 2020, 2019 Pre-Audit Extract (6:00 pm ET) 2018, 2017 Incremental Pre-Audit Extract (6:00 pm ET) Delivery to Issuers: • 2014 Incremental Pre-Audit File PPR Delivery 08/15/20 FFM Extract	16	17 Delivery to Issuers: • 2020 Pre-Audit File Delivery to Issuers: • 2019 Pre-Audit File	18 2020 RCNI Due 12pm Delivery to Issuers: • 2018 Incremental Pre-Audit File Delivery to Issuers: • 2017 Incremental Pre-Audit File	19
20	21 ER&R Dispute Submissions Due	22	23 Delivery to Issuers: • 2020 RCNO File Delivery to Issuers: • 1095A Dispute Correction IPA Files	24 <i>Data Matching Outreach File</i>	25	26
27	28	29 Treasury Payment	30 HIX 820 Delivery (08/15/20 FFM Extract)	October 1 st	2	3



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Cancellation/Termination Reason Code Updates

- CMS continues to analyze Issuer submission of Cancellation and Termination Reason Codes in the recon process to assess data quality and readiness to update the FFM with the Issuer-submitted values
- Common issues identified on Termination Reason Codes in May's Run 6 include:
 - No Termination Reason Code given on records where the Issuer has terminated the policy from active, open-ended coverage or is terminating to a different end date
 - Cancellation Reason Code given on a terminated policy
 - FFM-initiated Termination Reason Code given on records where the Issuer has terminated the policy from active, open-ended coverage or is terminating to an earlier end date
 - Issuers sending terminations initiated on the FFM after the 15th of the month and not yet reflected on the FFM extract (timing issue)

Proper Use of Termination Reason Codes

- **Scenario:** Policies representing active/open-ended coverage
 - Example: Bob enrolls effective 1/1/2020 and makes his binder payment, staying current with payments throughout the year

Member	Benefit Start Date	Benefit End Date	Exchange-Assigned Policy ID	Applied APTC Amount	Initial Prm Paid Indicator	Cancellation Reason	Termination Reason
Bob	1/1/2020	12/31/2020	14689	\$250	Y	6	6

- Observations and Recommendations
 - Some Issuers appear to be submitting Cancellation or Termination Reason codes for policies in active/open-ended coverage (approx. 19k records in Run 6)
 - Issuers should not be defaulting to a Cancellation or Termination Reason such as **6** (Non-Payment) or **12** (Other) simply to comply with the requirement to submit reason codes on the RCNI File
 - Issuers should review instances where their extract process has placed a Cancellation or Termination Reason Code on a record with a 12/31 end date to conduct root-cause analysis and ensure a reason code is not submitted in this scenario

Proper Use of Termination Reason Codes

- **Scenario:** Policies that had been previously terminated but have since been fully reinstated
 - Example: Mary enrolls effective 1/1/2020 and makes her binder payment
 - During the year, Mary enters the grace period for non-payment and is eventually terminated for non-payment by the Issuer with an end date of 2/29/2020
 - Mary realizes the error in payments from her bank and makes full payment to the Issuer; the Issuer then reinstates Mary's coverage fully as active/open-ended in the existing policy

Member	Benefit Start Date	Benefit End Date	Exchange-Assigned Policy ID	Applied APTC Amount	Initial Prm Paid Indicator	Cancellation Reason	Termination Reason
Mary	1/1/2020	12/31/2020	23532	\$350	Y		6

- Observations and Recommendations
 - Some Issuers appear to be persisting Termination Reason codes for policies that have since been reinstated
 - Issuers should ensure that policies that have previously been terminated but are now being submitted as reinstated, active/open-ended coverage do not include the Termination Reason code associated with the earlier termination

Proper Use of Termination Reason Codes

- **Scenario:** Policies for enrollees that have had a different policy terminated in 2020
 - Example: Mike enrolls effective 1/1/2020 and makes binder payment in Policy 38475
 - Mike returns to the Marketplace and enrolls in new coverage with the same Issuer when he moves across the state; as Mike selected a new plan his original policy is terminated and he receives a new policy 41837 effective 5/1/2020

Member	Benefit Start Date	Benefit End Date	Exchange-Assigned Policy ID	QHP ID	Initial Prm Paid Indicator	Cancellation Reason	Termination Reason
Mike	1/1/2020	4/30/2020	38475	12345XX001000101	Y		12 (Issuer may optionally send 3)
Mike	5/1/2020	12/31/2020	41837	12345XX003000501	Y		12

- Observations and Recommendations
 - Some Issuers appear to be submitting Termination Reason codes for policies where the same member has had a policy terminated earlier in the year
 - In some cases the Issuer includes the Termination Reason from the earlier terminated policy on the later active/open-ended policy; in other cases it appears that some default code such as **6** (Non-Payment) or **12** (Other) is being included
 - Issuers should ensure that Termination Reason codes that are appropriately associated to a policy do not appear on other policies for the same enrollee(s)

Proper Use of Termination Reason Codes

- **Scenario:** Policies where a member had been removed from the enrollment group
 - Example: Anna enrolls effective 1/1/2020 with her son Alex and makes binder payment and stays current with payments throughout the year
 - Alex gets a new job with employer-sponsored coverage and is removed from the enrollment group effective 6/30/2020

Member	Benefit Start Date	Benefit End Date	Exchange-Assigned Policy ID	Applied APTC Amount	Initial Prm Paid Indicator	Cancellation Reason	Termination Reason
Anna	1/1/2020	6/30/2020	51035	\$550	Y		1
Alex	1/1/2020	6/30/2020	51035		Y		1
Anna	7/1/2020	12/31/2020	51035	\$300	Y		1

- Observations and Recommendations
 - Some Issuers appear to be submitting Termination Reason codes when a member is removed from the enrollment group, even though the policy remains active/open-ended
 - These reasons are being submitted either for the individual member that was removed or for all records related to the policy
 - **Terminations do not occur at the member level;** removal of a member does not constitute termination of the policy
 - Termination Reason Codes are only to be used when the policy is terminated

Proper Use of Termination Reason Codes

- **Scenario:** Terminated policy with a cancelled segment
 - Example: Andy enrolled effective 1/1/2020 and effectuated coverage in QHP A; Andy updated his financial eligibility leading to a new Applied APTC Amount effective 3/1/2020; Andy moved which impacted his rating but stayed in QHP A effective 5/1/2020
 - Andy did not pay for any coverage after March
 - After honoring the grace period the Issuer terminates Andy's coverage effective 4/30/2020
 - As Andy stayed in the same policy with the change effective 5/1, at the policy level there is only a termination needed to end all coverage

Benefit Start Date	Benefit End Date	Exchange-Assigned Policy ID	Applied APTC	QHP ID	Initial Prm Paid Indicator	Cancellation Reason	Termination Reason
1/1/2020	2/28/2020	16789	\$250	QHP A	Y		
3/1/2020	4/30/2020	16789	\$300	QHP A	Y		6
5/1/2020	5/1/2020	16789	\$310	QHP A	C	6	

- Observations and Recommendations
 - Some Issuers appear to be submitting Cancellation Reason codes on cancelled segments for policies with some period of active coverage
 - Cancellation Reason Codes should only be sent if the **entire policy** has been cancelled

Tobacco Status Dispute Updates

- ER&R is implementing updates to the dispute processing rules in August to match the existing CMS rules regarding changes to Tobacco Status.
- Consumers who were under the age of 21 at the start of a 2020 policy cannot have a Tobacco Status of Y.
 - For all previous coverage years, consumers under the age of 18 at the start of a policy cannot have a Tobacco Status of Y.
- Going forward, upon receiving a Tobacco Status dispute, ER&R will verify the consumer's age on the start date for the earliest segment of the disputed policy.
 - ER&R will reject the update if the consumer's age is under 21 and the disputed coverage span is for 2020 or if the consumer's age is under 18 for coverage years prior to 2020.
- ER&R will also monitor changes to the date of birth for consumers with a Tobacco Status of Y to ensure that the new date of birth does not conflict with the tobacco age restrictions.

Q&A

