DPA/PPFMG/CCIIO

Cost-sharing Reduction (CSR) Discrepancy Frequently Asked Question

Date: July 23, 2018

CSR Reconciliation Discrepancy

Question: Can an Issuer file a Cost-sharing Reduction (CSR) reconciliation discrepancy to submit additional 2017 benefit year (BY) claims that it was unable to submit by the June 1, 2018 CSR reconciliation data submission deadline?

Answer: Yes, Issuers may submit a discrepancy to include additional claims that have been paid and re-adjudicated for the 2017 BY that were not previously reconciled by the CSR reconciliation data submission deadline of June 1, 2018. As a reminder, when submitting additional BY 2017 claims, Issuers must recalculate and restate all claims for the associated policies as necessary using the standard CMS methodology, in accordance with the policies and procedures set forth in the "Manual for Reconciliation of the CSR Component of Advance Payments for Benefit Year 2017". The deadline to file a CSR reconciliation discrepancy for the 2017 BY and 2016 BY restatements, if applicable, is **11:59 p.m. EDT on August 10, 2018**.

For more information, the CSR Reconciliation Discrepancy Specification and Training Slides are available at the below links.

- CSR Reconciliation Discrepancy Resolution Inbound Specification: https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/CSR-Recon-Discrepancy-Reporting-BY2017.pdf
- CSR Reconciliation Discrepancy Process Overview for BY 2017 and BY 2016 Restatements: https://www.regtap.info/uploads/library/FT_CSR_DiscrepancySlides_062818_5CR_070318.pdf