

DISTRIBUTED DATA COLLECTION (DDC) FOR REINSURANCE (RI) AND RISK ADJUSTMENT (RA): Overlapping Claims Detail Reporting for the 2015 Benefit Year

May 31, 2016



**Health Insurance Marketplace Program
Training Series**

Session Agenda

- Session Guidelines
- Intended Audience
- Goals and Objectives
- 2015 Overlapping Claims Detail Reporting Overview
- Completing the Overlapping Claims Detail Reporting Process
- Next Steps
- Key Dates and Deadlines

Session Guidelines

- This is a 90-minute webinar session.
- For questions regarding content, please submit inquiries to: raripaymentoperations@cms.hhs.gov
 - Include “**Overlapping Claims**” and at least one (1) Health Insurance Oversight System (HIOS) ID in the subject line.
- For questions regarding logistics and registration, please contact the Registrar at: (800) 257-9520.

Intended Audience

- External Data Gathering Environment (EDGE) Issuers of RA and RI Plans.
- Third Party Administrators (TPAs) and Support Vendors.

Goals & Objectives

- Provide an overview of the overlapping claims detail reporting process for the 2015 Benefit Year.
- Describe how to complete the overlapping claims detail reporting process using the Overlapping Claims Detail Reporting web form.
- Identify the information needed prior to completing the web form.
- Review the different overlapping claims submission types.
- Use the 2015 Overlapping Claims Detail Reporting Job Aid as a tool to create the .CSV file.
- Create the .CSV file to be submitted using the web form.
- Review key dates and deadlines.

2015 Overlapping Claims Detail Reporting Process Overview

Overlapping Inpatient Claims Issue

- An overlapping inpatient claim (overlapping claim) occurs when the statement coverage date of one (1) claim overlaps, by more than one (1) day, the statement coverage date on another claim, indicating that one (1) of the claims may be incorrect.
- The EDGE server has logical checks (outlined in Section 7.16 of the Business Rules) that should prevent overlapping claims from being accepted.
- CMS has identified, under limited circumstances, overlapping claims are being accepted and stored on the issuers' EDGE servers as active, making them erroneously eligible for the risk adjustment and reinsurance calculations.
- CMS required that all issuers run the **Overlapping Claims Summary Count** query and report a discrepancy by May 31, 2016, if one (1) or more overlapping claims were identified.

Implication for RI Affected HIOS IDs

- CMS expects these overlapping claims may result in overpayment of reinsurance and will therefore reduce the total reinsurance eligible payment from the Reinsurance Summary Report (RISR) produced by the May 3, 2016 command by the total paid amount to the maximum of \$205,000 per affected enrollee in the Individual Market reported through the **Overlapping Claims Summary Count** query for the affected issuer.
- CMS will make adjustments to the reduced reinsurance amount once issuers have performed the necessary research to verify the overpayment and report it to the Centers for Medicare & Medicaid Services (CMS).

Implication for RA Affected HIOS IDs

(Continued)

- At this time, CMS expects that the impact on any RA overlapping claims is very minor.
- If a company identifies overlapping claims that only impact RA or Small Group Market enrollees, the issuer will receive a communication from CMS stating that they do **NOT** need to participate in the Overlapping Claims Detail Reporting Process.
 - The communication from CMS will be sent on June 1, 2016.
- If a company did not provide sufficient information in their discrepancy reporting for CMS to determine if the overlapping claims impact only RA, the issuer will be invited to report as part of the Overlapping Claims Detail Reporting Process.

Reinsurance Payments for Affected HIOS IDs

Issuers should perform the following research:

1. Execute the **Overlapping Claims Details** query to return the Claim ID and claim details of the overlapping claim identified.
2. Execute the **Inpatient Overlapping Claim Original Claim Association** query to identify all active overlapping inpatient claims.
3. Determine if the enrollees with the overlapping claims are RI-eligible.
4. Determine the total overpaid amount related to the overlapping claims for the RI-eligible enrollees.

Then, issuers will report the confirmed overpaid amount to CMS via the Overlapping Claims Detail Reporting web form.

Completing the Overlapping Claims Detail Reporting Process

Accessing the Web Form

- CMS will email a link to complete the Overlapping Claims Detail Reporting web form to all companies who have submitted a CMS Identified Overlapping Claims discrepancy.
 - The email will come from the RARI Payment Operations email box.
- The web form is where issuers need to report all invalid overlapping claims research results.



Issuers must report all invalid overlapping claims research results **only through** the web form. Do not email the RARI mailbox your research results.



Information Needed Prior to Completing the Web Form



The web form must be submitted in a single session; it is **NOT** possible to save and return to the session. It is recommended that issuers collect all necessary data prior to starting the reporting process.

Information	Details
Submitter Contact Information	The Submitter Contact information cannot be the same as the Alternate Contact information. The CEO Designate must be entered as either the Submitter or as the Alternate Contact.
Alternate Contact Information	The Alternate Contact information cannot be the same as the Submitter Contact information. The CEO Designate must be entered as either the Submitter or as the Alternate Contact.
Discrepancy ID	The number generated from the RA/RI Attestation and Discrepancy Reporting web form.
Impacted HIOS ID(s)	A valid 2015 HIOS ID that has an invalid overlapping claims discrepancy.
Total Number of Reinsurance Eligible Enrollees Affected	The number of RI enrollees that have invalid overlapping claims.

Information Needed Prior to Completing the Web Form (Continued)

Information
Masked Enrollee ID
MOOP Adjustment for Enrollee Amount
Total RI Eligible Claims Count (from RIDE)
Total RI Eligible Paid Claims Amount (from RIDE) <totalPaidClaims>
Total RI Invalid Overlapping Claims Count
Total RI Invalid Overlapping Paid Claims Amount

Information Needed Prior to Completing the Web Form (Continued)

Information	Details
Explanation for Valid Overlapping Claims	A brief explanation of the results of their research for some or all of the overlapping claims identified as valid and included in the 2015 Benefit Year reinsurance payment. CMS will use this information to evaluate the overlapping stay logic and determine if further guidance or modifications are needed for 2016 data submission.
Supporting Documentation	This is not required, but issuers have the option of uploading supporting documentation to be submitted with the web form.
Attester Contact Details	The individual providing attestation is someone who can legally and financially obligate the company.

Web Form: Welcome Page & Contact Information Page

Welcome page:

- Review the information provided on the **Welcome** page.
- Select the **Continue** button to access the **Contact Information** page.

Contact Information page:

- Complete all required fields: Submitter, Alternate, and CEO Contact information, as indicated with a red asterisk (*).
- The CEO Designate contact information must be entered as either the Submitter or as the Alternate Contact.
- The Submitter and Alternate Contact information must not be the same individual.
- Select the **Continue** button.

Web Form: Overlapping Claims Submission Type Page

The Overlapping Claims Detail Reporting web form allows issuers to submit invalid overlapping claims information using the following submission types:

- Upload .CSV file – recommended for issuers reporting for more than five (5) HIOS IDs or a large number of enrollees (more than 1000).
- Online entry – manual entry of each invalid overlapping claim at the HIOS ID level and by enrollee per HIOS ID.



If a HIOS ID has ONLY valid overlapping claims, you must use online entry to report.

Web Form: Discrepancy ID and Invalid Overlapping Claims Entry

Discrepancy ID:

- Enter the Discrepancy ID associated with the “CMS Identified Overlapping Claims” discrepancy submitted by your organization.

Invalid Overlapping Claims Entry:

- Enter a valid HIOS ID with invalid overlapping claims.
- Under the reinsurance section enter the total number of reinsurance eligible enrollees affected for that HIOS ID.
- After entering the appropriate number, select the “Create Table” button.
 - The table will have as many rows as the entered number of RI-eligible enrollees.
 - The table is where you will enter the detailed information for each enrollee.



If a HIOS ID has ONLY valid overlapping claims, enter the number 0 (zero) for the number of RI eligible enrollees and create the table.

Web Form: Invalid Overlapping Claims Entry

Invalid Overlapping Claims Entry (Continued):

- Enter the following into the table for each enrollee –
 - Masked Enrollee ID
 - Maximum Out-of-Pocket (MOOP) adjustment for enrollee amount
 - Total RI-eligible Claims Count (from RIDE)
 - Total RI-eligible Paid Claims Amount (from RIDE) <totalPaidClaims>
 - Total RI invalid overlapping paid claims amount
- The table will also include the following columns – these columns will only be populated once the enrollee information is entered and the “Calculate” button is selected.
 - New RI total claims count (difference)
 - New RI total paid claims amount (difference)
 - Current estimated RI payment
 - New estimated RI payment (without overlapping claims)

Web Form: Summary and Verification Page

After entering the Invalid Overlapping Claims data for one HIOS ID, select “Continue.”

Summary and Verification:

- The page will display the information entered thus far, including the Discrepancy ID and HIOS ID specific information.
 - It is possible to View, Edit, and Delete from the Summary table on this page.
- Explanation for Valid Overlapping Claims section.
 - This section is **required** if you entered 0 (zero) for the number of RI-eligible enrollees for any HIOS ID.
- Attachments Summary section.
 - Optional section for the uploading of any supporting information.
- Contact Information section – review for accuracy.
- Do you have another HIOS ID for which you need to report invalid overlapping claims?
 - Select the “Yes” radio button to report for an additional HIOS ID.
 - Select the “No” radio button if you have reported for all applicable HIOS IDs.

Web Form: Attester Details

Review the Attestation Statement and select the check box.

- The Attester Details include:
 - First Name
 - Last Name
 - Job Title
 - Email Address
 - Phone Number
- The Attester's information must be entered, but this does not need to be the individual completing the web form.
 - The Attester can be the same or different from the previously entered Submitter and Alternate Contact.
 - The Attester must be able to legally and financially obligate the company.
- After entering the Attester Details, select the "Submit" button to complete the Overlapping Claims Detail Reporting process.
 - If necessary, select back to return to the previous page.

Using the 2015 Overlapping Claims Job Aid

- We recommend using the 2015 Overlapping Claims Job Aid if you are reporting for five (5) or more HIOS IDs, or a significant number of enrollees (1,000) since the web form cannot be saved.
- The 2015 Overlapping Claims Job Aid will be sent with the invitation email on June 1, 2016.
 - To support the use of the job aid, we have developed the 2015 Overlapping Claims Detail Reporting Job Aid Manual.
 - The job aid is an Excel tool that will allow for entry of Overlapping Claims Detail data and support the creation of a .CSV file.
 - The .CSV file will be uploaded to the Overlapping Claims Detail Reporting web form.

Using the 2015 Overlapping Claims Job Aid Manual

- The 2015 Overlapping Claims Detail Reporting Job Aid Manual outlines the processes for:
 - Enabling Macros in the Job Aid
 - Completing the Job Aid
 - Troubleshooting
 - Uploading the .CSV File to the web form
- The Job Aid Manual also contains details on the calculations that occur within the web form



The Job Aid does not include auto-calculated fields – the calculation information will be available after the .CSV file is uploaded to the web form

Next Steps

- Run the latest CMS-provided query posted to the Registration for Technical Assistance Portal (REGTAP).
- Determine if you plan to report Overlapping Claims Detail information using manual entry or the job aid.
- Collect the required information for completing the process of entering information manually or use the job aid.
- Monitor email for the 2015 Overlapping Claims Details Reporting invitation email containing the link to the web form, job aid, and job aid manual.
- Contact CMS at RAR!paymentoperations@cms.hhs.gov with any questions about the Overlapping Claims Detail Reporting process.

Key Dates and Deadlines

Action	Date/Deadline
CMS sends Overlapping Claims Detail Reporting Invitation.	June 1, 2016
Issuers report Overlapping Claims Detail research results in order for CMS to update the June 30 th report.	June 8, 2016
Issuers report Overlapping Claims Detail research results in order for CMS to update future payments, if applicable.	August 31, 2016

Questions?

To submit questions by phone:

- ☐ Dial '14' on your phone's keypad
- ☐ Dial '13' to exit the phone queue

Resources

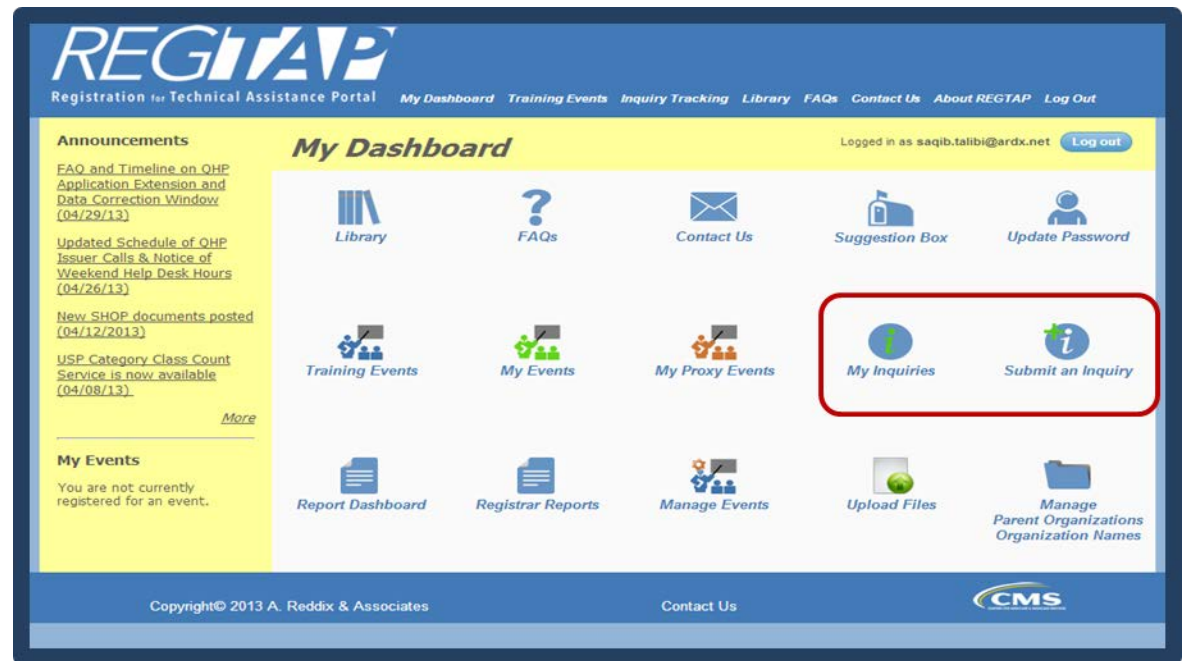
Resources

Resource	Link/Contact Information
Center for Consumer Information and Insurance Oversight (CCIIO)	http://cms.gov/ccio/
Registration for Technical Assistance Portal (REGTAP) • Registration • Inquiry Tracking and Management System (ITMS) • Resource Library • Frequently Asked Questions (FAQs)	https://www.REGTAP.info/

Inquiry Tracking and Management System (ITMS)

ITMS is available at <https://www.REGTAP.info>.

Users can submit questions after the User Group by selecting “Submit an Inquiry” from My Dashboard.



Note: Enter only one (1) question per submission.

FAQ Database on REGTAP

My Dashboard



FAQ Database is available at
<https://www.REGTAP.info>

The FAQ Database allows users to search FAQs by FAQ ID, Keyword/Phrase, Program Area, Primary and Secondary categories, and Publish Date.

FAQ Search

FAQ ID

Keyword/Phrase

Program Area
Select All
Agent Broker
Distributed Data Collection for RI and RA/Edge Server
Enrollment and Eligibility
Event Registration and Logistics

Primary Category

Secondary Category

Publish Date
Start Date End Date

Primary and Secondary Category search available only when one (1) Program Area is selected.

Closing Remarks