

Data Matching Issues (DMIs) 2018 Issuer Outreach File Delivery Operations Schedule Update



Center for Consumer Information and Insurance Oversight (CCIIO)

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https://www.regtap.info/FFENR.php

The information provided in this presentation is not intended to take the place of the statutes, regulations, and formal policy guidance that it is based upon. This material summarizes current policy and operations as of the date it was uploaded to REGTAP. Links to certain source documents may have been provided for your reference. We encourage persons taking the course to refer to the applicable statutes, regulations, and other interpretive materials for complete and current information.

Data Matching Issues (DMIs) 2018 Operations Information Update

Background

Enrollees who experience an adjustment in eligibility to be enrolled in a Qualified Health Plan (QHP) or for financial assistance; (loss or adjustment of Advance Premium Tax Credit (APTC) and cost-sharing reduction (CSR), due to an unresolved DMI, will be indicated on the 834 transaction files to the issuer. As such, Issuers will be able to identify if a policy is being modified by the origin code populated on the M834 transaction

• **Note:** Issuers should not update your systems with the information contained in the DMI files, instead 834 transactions from the FFM will be sent for issuers to adjust the coverage of impacted policies.

Data Matching Issues (DMIs) 2018 Operations Information Update, continued.

- Key Differences when a M834 is generated through Eligibility Support Desk (ESD) compared to a consumer initiated request:
 - While M834 transactions generally cannot be generated when an active policy has a future termination date a M834 transaction will be generated with a change is reported through the ESF. As such, issuers should be looking at the origin type code on the 2750 loop in order to see that the change is coming from ESD and they should retain the end date.
 - In the rare scenario that a consumer reported a change which resulted in a future maintenance effective date that is not yet passed, and the issuer receives a M834 transaction for an expiring data inconsistency with a maintenance effective date prior to the existing maintenance effective date, the FFM will generate two M834 transactions. (This is the only circumstance that the FFM will send two M834 transactions for a single change)
 - For example, on 3/6/18, an enrollee reports a future move effective 5/1/18. A M834 transaction is generated with the updated address and financial information (new rating area everything else remains and why a M834 is generated) effective 5/1/18. On 3/10/18 the ESD adjusts the enrollee's APTC due to an expiring income inconsistency. Two M834s would be generated in this case, The first would be effective 4/1/18 with the updated financial amounts with the old rates and the second transaction effective 5/1/18 with the update financials for the new rates based on the new rating area.

2018 Data Matching Issues (DMI) File Delivery Schedule

Approximate Date DMI	Date Changing 834	Date Coverage Change
Outreach files Delivery	Coverage Sent by	Effective
	the Marketplace	
N/A	1/1 to 1/14	N/A
Thursday, January 11, 2018	2/1/ to 2/14	03/01/2018
Thursday, February 8, 2018	3/1 to 3/14	04/01/208
Thursday, March 8 2018	4/1 to 4/14	05/01/2018
Thursday, April 12, 2018	5/1 to 5/14	06/01/2018
Thursday, May 10, 2018	6/1 to 6/14	07/01/2018
Monday, June 11, 2018	7/1 to 7/14	08/01/2018
Thursday, July 12, 2018	8/1 to 8/14	09/01/2018
Tuesday, August 14, 2018	9/1 to 9/14	10/01/2018
Thursday, September 13, 2018	10/1 to 10/14	11/01/2018
Thursday, October 11, 2018	11/1 to 11/14	12/01/2018
Wednesday, November 14, 2018	12/1 to 12/14	01/01/2019

Data Matching Issues (DMIs) Issuer Outreach Files Delivery

- Based on the 2018 DMI schedule, on Thursday, January 11, 2018, CMS plans to deliver issuer outreach files for consumers who are at risk for Marketplace action in February, 2018, unless they successfully resolve their data matching issues.
- These enrollees are at risk of losing eligibility for a QHP or financial assistance at the end of February with enrollee's eligibility adjusted effective March 1, 2018. Expiration . Expiration "NLE" transactions will be sent during the first two weeks of February.

Note: Issuers should not update your systems with the information contained in the DMI files, instead 834 transactions from the FFM will be sent for issuers to adjust the coverage of impacted policies