CMS
CENTERS FOR MEDICARE & MEDICAID SERVICES

Enrollment Blockers and How to Handle Questions and Answers (Q & A)



Center for Consumer Information and Insurance Oversight (CCIIO)

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

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Introduction to Enrollment Blockers

- Enrollment Blockers are a technical error encountered when a consumer reports changes to the Federally Facilitated Exchange (FFE). When this occurs, the enrollee successfully submits an application that yields a new eligibility determination, but is blocked from updating the FFE policy. The FFE opens a HICS case to communicate the new eligibility information to the issuer, which applies the change to its record and reports the information back to the FFE in ER&R so that the FFE policy record is updated
- Specific language is contained in the HICS case narrative. These cases will mention Enrollment Blocker.
- CMS guidance requires issuers to resolve these cases by doing the following:
  - Make the corresponding updates in their internal system
  - Submit an Error Resolution & Reconciliation (ER&R) dispute to update financial values in the FFM associated to an enrollment group when the addition of a member is blocked

Enrollment Blockers via the Enrollment Dispute Form

- There are two methods by which an issuer may submit an Enrollment Blocker dispute to ER&R:
  - The Enrollment Blocker tab functionality on the Enrollment Dispute Form
  - The HICS Direct Dispute feature by selecting the ER&R Review Requested radio button in HICS to assign these cases directly to ER&R.

Enrollment Dispute Form – Required Information

- Issuers must include the following information when submitting Enrollment Blocker disputes on the Enrollment Dispute Form:
  - HIOS
  - Coverage Year
  - FFM Exchanged Assigned Policy ID
  - FFM Exchange Assigned Subscriber ID
  - Total Premium Amount to be applied
  - APTC Amount
  - QHP ID/Variant ID
  - HICS case ID
  - FFM Benefit Start Date
  - FFM Benefit End Date

Enrollment Blockers via HICS Direct Dispute (HDD)

- Issuers can submit Enrollment Blocker disputes via the HDD method to complete the following:
  - Align coverage dates
  - Update the financial amounts (but not demographics)
  - Update the QHP ID/Variant ID
  - Remove a member
  - Updated financials to reflect an added member (but not their name or other demographics

NOTE: As with Enrollment Blockers submitted via the Enrollment Dispute Form, issuers may only use the HICS Direct Dispute process to align dates and financial amounts of a policy that already exists in the FFE database. Where there is no existing plan enrollment, ER&R cannot add consumers into the FFE database. ER&R cannot add a new member to the policy, but can update the subscriber record to reflect the financial impact of the newest member.

HDD – Required Information

- For each Enrollment Blocker dispute submitted via HDD, issuers must provide the following required information in the resolution note:
  - Enrollment Blocker Type
  - Benefit Start Date
  - Total Premium Amount to be applied
  - APTC Amount
  - CSR Variant
  - FFE Exchange Assigned Policy ID
  - FFE Exchange Assigned Subscriber ID
  - Start Date as a result of the new member (if applicable)

NOTE: While this information is required, it does not mean there was a change to that field as a result of the HICS case. This information is needed to assist in making the final determination for case resolution.

Routing of HICS Direct Dispute Case to ER&R

- To submit a HICS case via HDD, the following conditions must exist:
  - The HICS case status must be “Open”
  - The HICS case must be related to an approved HICS Direct Dispute type
  - The “CMS Issue” checkbox must be unchecked
  - The case Category must be Plan and Issuer Concern (Category 2.x)
  - The “ER&R Review Requested” checkbox should be a “Yes”

HDD Enrollment Blocker Question & Answers (Q & As) – Demographics

Question: Can an issuer update demographic information via HDD cases?

Answer: No, issuers cannot update the member demographic fields (e.g., Name, DOB, SSN and Physical Address) through the Enrollment Dispute process.

NOTE: Issuers can update the Mailing Address through an Inbound Reconciliation File (RCNI). For additional guidance on updating Mailing address via Reconciliation (RCNI), reference :
https://www.regtap.info/reg_librarye.php?i=2311

HDD Enrollment Blocker Q & As, cont'd.,– APTC Amount or QHP ID Mismatch

Question: What if the issuer resolution note APTC Amount or QHP ID values mismatch with the values reported in the HICS Case Narrative?

Answer: If the HICS Case Narrative mentions a different APTC Amount or QHP ID than what the issuer states in the case resolution note, the issuer should correct the values in the resolution note to align with the values reported in the Case Narrative or contact their Account Manager to have the values in the Case Narrative updated if the issuer believes the HICS case/FFM policy should have APTC or QHP ID adjustments.

HDD Enrollment Blocker Q & As, cont'd.- Case Close Out

Question: How does an issuer close out a case after it is returned following the ER&R process?

Answer: For all HICS Direct Dispute Cases, once the ER&R Review Requested field is set to "No", the issuer can then view the case in HICS, review the notes, perform consumer outreach if needed, and resolve the HICS case.

HDD Enrollment Blocker Q & As, cont'd., - Policy Split

Question: Can an issuer request to split a policy?

Answer: No, an issuer cannot specifically request to split a policy. However, when working a HICS Direct Dispute case such as an Enrollment Blocker, ER&R may need to resolve the case by splitting the policy in order to align financials and coverage dates.

HDD Q & As, cont'd., – Radio Button

Question: When does the ER&R contractor change the radio button from "Yes" to "No"?

Answer: ER&R will update the radio button in HICS from "Yes" to "No" when the case has been fully resolved and a disposition code has been applied.

HDD Q & As, cont'd., – Radio Button

Question: Is there functionality that would allow issuers to submit multiple HICS cases to ER&R without manually selecting the "ER&R Review Requested" radio button on each applicable case?

Answer: No, issuers must use the "ER&R Review Requested" radio button to manually update each applicable HICS case to initiate a HICS Direct Dispute case.

HDD Q & As, cont'd., – Case Resolution Timeframe

Question: What should be the timeframe for the resolution of HICS cases referred to ER&R?

Answer: The timeframe for HICS resolution depends on the case, but ER&R tries to resolve cases within 30 days.

HDD Q & As, cont'd., – Case Resolution Timeframe

Question: How do issuers know which HICS Direct Disputes are currently being processed by ER&R and when those disputes are returned?

Answer: Issuers should pull a HICS Extract to view current information on HICS cases assigned as Direct Disputes. Cases where the ER&R Review Requested field is set to "Yes" are still being worked on by ER&R. That field will change to "No" once the case is assigned back to the issuer. Issuers can also find the status of HICS cases on the bi-weekly dispute disposition reports.

HDD Q & As, cont'd., – No change in FFM Required

Question: If the updated values an issuer is looking for are already present in the Pre-Audit file, should the issuer submit a HICS Direct Dispute to make the change?

Answer: No, it is not necessary to submit a Direct Dispute if the values are already present in the Pre-Audit file. This indicates that the desired updates have already been applied and no submission is needed.

HDD Enrollment Blocker vs. Enrollment Dispute Form Enrollment Blocker

Criteria	HDD Enrollment Blocker	Enrollment Dispute Form
HICS Case Status	▸ Open	▸ Open or Closed
Case Processing Time	▸ Faster processing – ER&R can communicate with the issuer if clarification or additional information is needed and reprocess the case immediately	▸ Slower processing – ER&R must communicate with the issuer via issuer outreach to obtain additional information
Accuracy of Information	▸ Updates are more accurate because the HICS case is recent and related to the dispute	▸ ER&R may not have the most up-to-date or accurate information due to the age of the HICS case
Bulk Upload	▸ Issuers do not have the option to bulk upload cases	▸ Issuers can bulk upload cases via the Enrollment Dispute Form
Removal of Member	▸ Removal of a member can be accomplished	▸ Removal of a member is not allowed
Response Time	▸ After processing, the issuer receives an immediate response regarding the outcome of the dispute	▸ The issuer needs to review their ERRD Semi-Monthly Detailed Report for the outcome of the dispute