

Subscriber Swap Update (2/25/19)

*Consumer Information &
Insurance Oversight (CCIIO)*

February 25, 2019

<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

Subscriber Swap Issue

- CMS recently discovered unexpected system behavior where after a consumer updated their 2019 application, the original subscriber on the 2019 policy was inadvertently switched with a dependent on the policy. In other words, the dependent was made subscriber and the original subscriber was made a dependent.
 - As a result, impacted enrollees could have been confused when receiving new insurance ID cards reflecting the change in subscriber, or erroneous bills from issuers.
- On January 28, 2019, Issuers with impacted enrollments were sent a MISC9 Incremental Pre-Audit file with the affected policies. This file was sent purely for awareness in case Issuers received complaints or questions from consumers who noticed a change in subscriber to their policy.
 - Filename: **[TPID].MISC9.D190128.T143112509.P.OUT**
- Currently, ~14k policies have been identified as having a change in subscriber without the consumer taking any intentional action to make such a change.
- No new examples have been evidenced since 12/19/18; however, analysis is ongoing to determine the root cause and any necessary system changes needed to prevent future occurrence.

Subscriber Swap Issue Next Steps

- On February 7, a data cleanup at the FFE was performed to revert to the original subscribers of the impacted policies. At this time, no consumer action is needed at the FFE
- On February 8, 2019, CMS sent an outreach file (IOUTRC) to impacted Issuers so they could perform outreach to enrollees whose policy experienced an inadvertent change in subscriber in order to make them aware of the change at the FFE, and flag that they will be receiving updated ID cards reflecting the change in subscriber once corrected in Issuers' systems.
- On February 21, Issuers with impacted enrollments received an Incremental Pre-Audit file (MISC9) which Issuers should be using to align their data with the subscriber changes made at the FFE as a result of the cleanup.