Cost-sharing Reduction (CSR) Reconciliation Technical Assistance

May 18, 2016

CSR Reconciliation Technical Assistance Series

CMS
CENTERS FOR MEDICARE & MEDICAID SERVICES

HTTPS://WWW.REGTAP.INFO/

Update

- Reprocessing of files affected by the QHP ID and Exchange Assigned Subscriber ID validation issues has been completed.
- Files were reprocessed if they met this criteria:
  - The file(s) were the most recent submission for a HIOS ID and benefit year,
  - The file(s) had a status of Accepted or Accepted with Errors, and
  - The error reports associated with the file(s) had Error Codes CSRIFIL50, CSRIFIL37, or CSRIFIL67.

Update

Actuarial Value Amount of the Standard Plan (Element ID 308)

- We anticipate relaxing this validation on Friday (5/20) to allow for up to 4 decimal places. Currently, the system enforces a 2 decimal place precision.
- Issuers should report values for this data element as .6874, not 68.74.
- If you received Error Code CSRIFIL56 (03 - Invalid Actuarial Value of the Standard Plan) because you submitted a value with more than two decimal places, resubmit your file early next week and you should no longer receive this error.

Update

- If you need to notify us about a change in your methodology, please email CSRreconquestions@cms.hhs.gov by **Wednesday, May 25th.**
  - For example, some issuers initially said they would be using Simplified methodology, but that they would try to use Standard methodology. These issuers may be experiencing file rejections because of their methodology selection.
  - In advance of the June 3rd submission deadline, we anticipate making the last update to our records on May 27th . This will allow issuers that have been experiencing rejections due to methodology time to resubmit their file and have a file that is Accepted or Accepted with Errors by the June 3rd deadline.

Reminder

How to calculate your CSR reconciliation amount

- Take *"CSR Amount for 201x"* minus "V*alid CSR Amount at Policy Detail Level" = CSR Reconciliation amount for HIOS ID and benefit year*
- "*Invalid CSR Amount at Policy Detail Level"* is the sum of Actual CSR Provided for Policy Detail (03) records that have an invalid Exchange Assigned Subscriber ID and/or invalid QHP ID
- *"Difference between the Allowed and Submitted CSR Amounts"* can be ignored, although it is accurate and can be considered the CSR reconciliation amount IF the issuer does not have any invalid QHP IDs or Exchange Assigned Subscriber IDs in the Policy Detail (03) records

Reminder

Example - How to calculate your CSR reconciliation amount

INVALID CSR AMOUNT at Plan Summary Level =0
VALID CSR AMOUNT at Plan Summary Level =1234.56
INVALID CSR AMOUNT at Policy Detail Level = 234.56
VALID CSR AMOUNT at Policy Detail Level =1000.00
Missing QHPID's from Policy Level Records (03 Record Level) :

12345MN001000103
12345MN001000204
12345MN001000305
12345MN001000406

CSR Amount for 2014 :
800.00

Difference between the Allowed and Submitted CSR amounts :
-423.56

ERROR_CODE ERROR_DESCRIPTION ERROR_COUNT
CSRIFIL50 03 - Invalid Exchange Assigned Subscriber ID Lookup (FEPS) 92 2016-05-15

Issuer's actual CSRR amount will be:

CSR Amount for Benefit Year – Valid CSR Amount at Policy Detail Level

= 800.00 - 1000.00 = -200.00 (Due to Issuer)

Questions?

To submit questions by phone:

- *Dial ‘14’ on your phone’s keypad*
  - *Dial ‘13’ to withdraw your question*

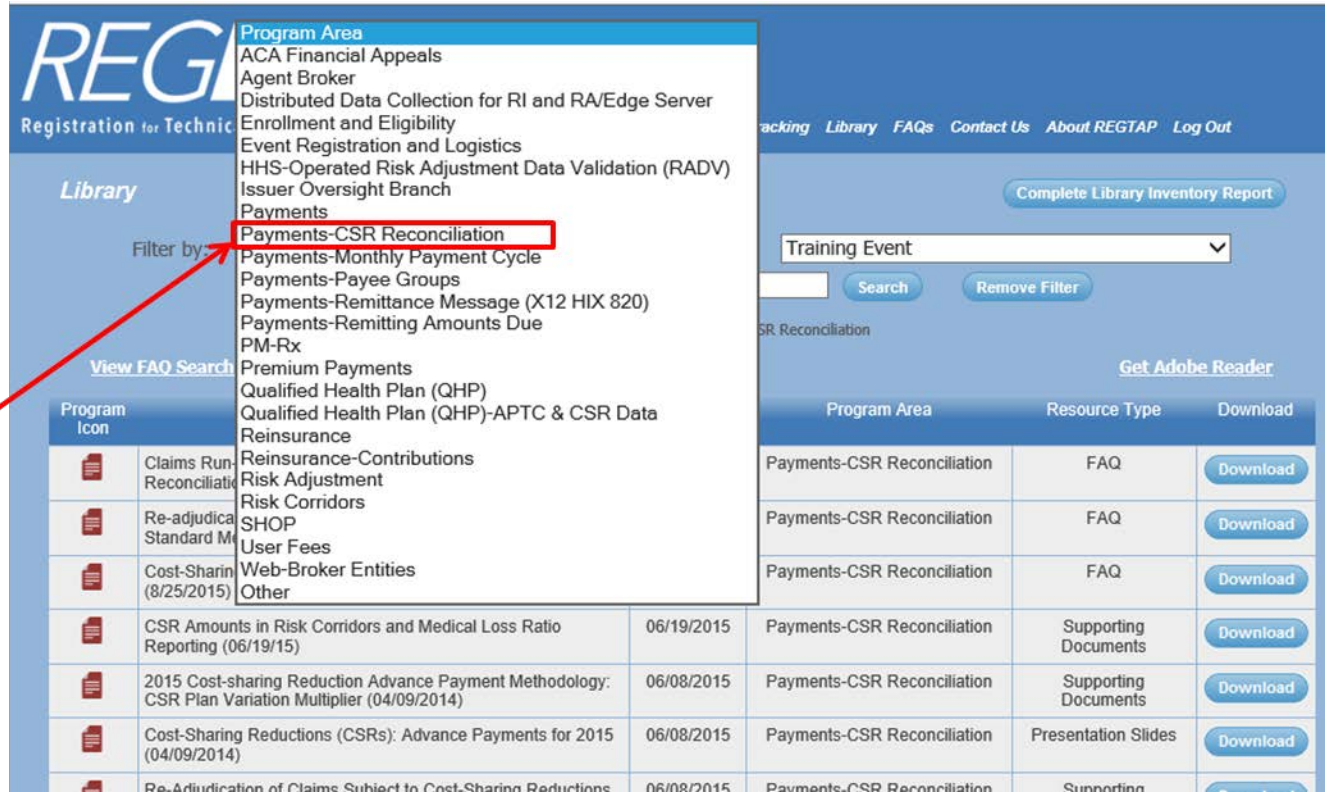
To submit questions by webinar:

- *Type your question in the text box under the ‘Q&A’ tab*

Locating CSR Reconciliation Documents in REGTAP

Stakeholders can access additional documents at https://www.REGTAP.info in the REGTAP Library.

Under Program Area, select "Payment-CSR Reconciliation"



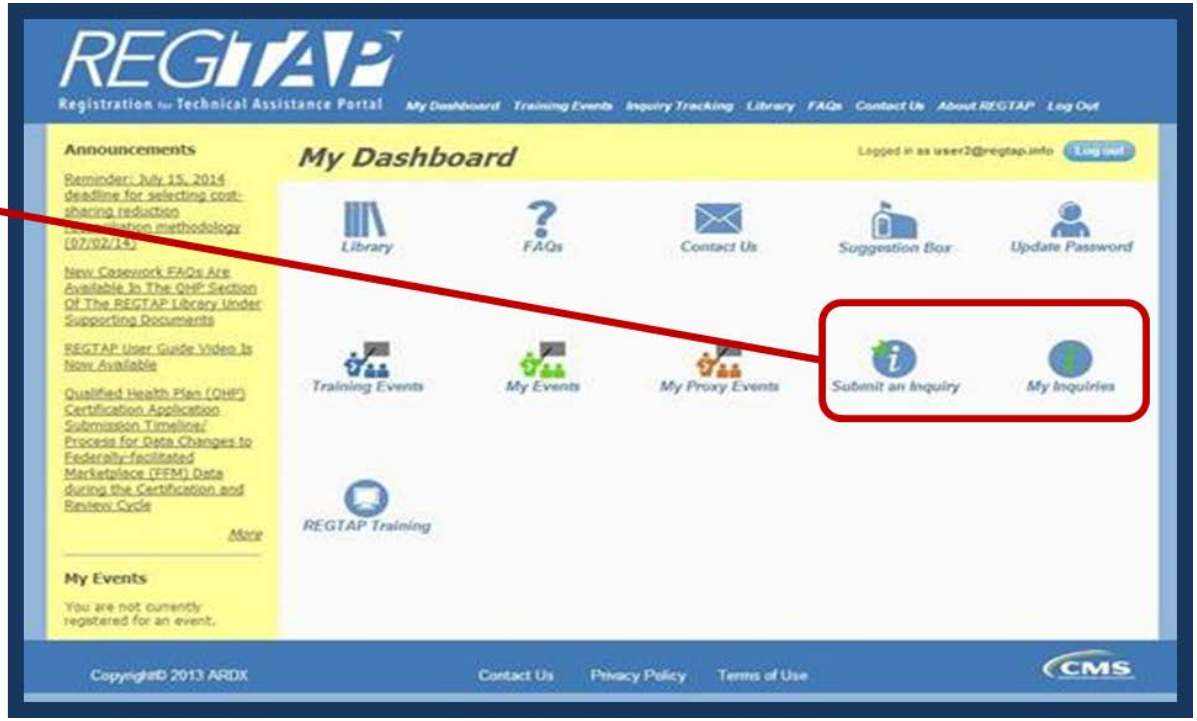
Resources

Resource	Resource Link
U.S. Department of Health & Human Services	http://www.hhs.gov/
Centers for Medicare & Medicaid Services (CMS)	http://www.cms.gov/
The Center for Consumer Information & Insurance Oversight (CCIIO) web page	http://www.cms.gov/cciio
Consumer website on Health Reform	http://www.healthcare.gov/
Registration for Technical Assistance Portal (REGTAP) - presentations, FAQs	https://www.REGTAP.info

Inquiry Tracking and Management System (ITMS)

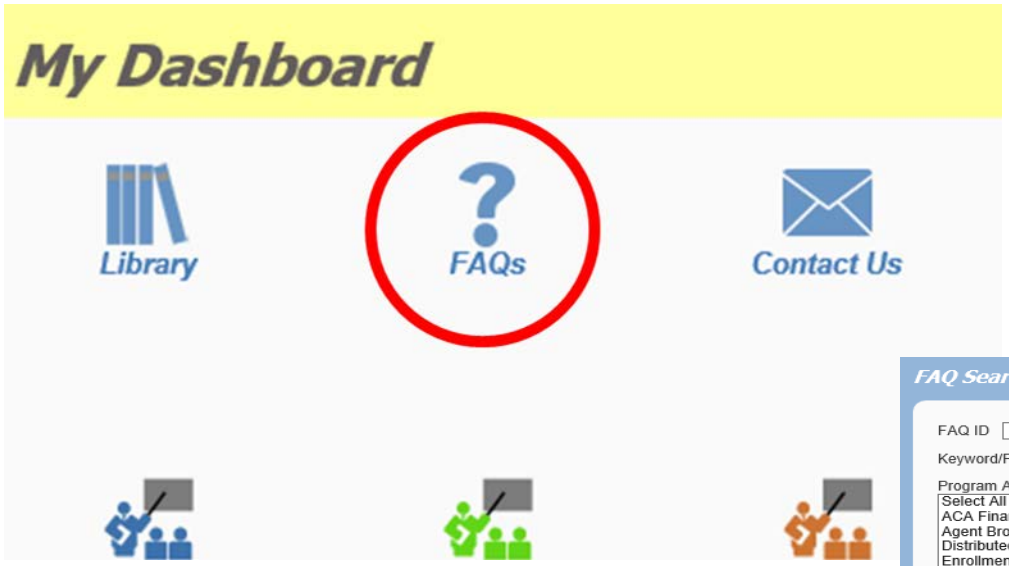
Stakeholders can submit inquiries to https://www.REGTAP.info through ITMS.

Select ‘Submit an Inquiry’ from My Dashboard.

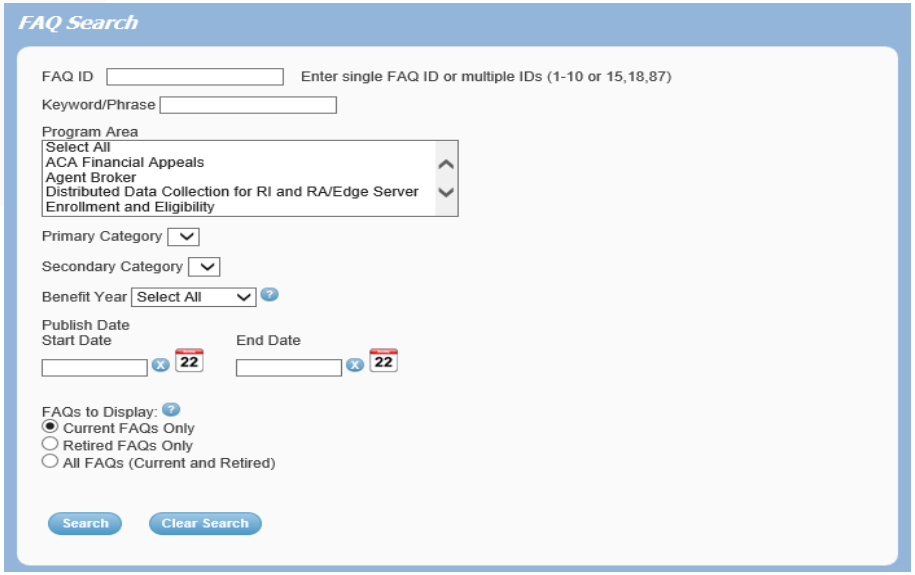


Note: Enter only one (1) question per submission.

FAQ Database on REGTAP



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



FAQ Database is available at https://www.regtap.info/

Closing Remarks