Cost-sharing Reduction (CSR) Reconciliation for Benefit Years 2014 and 2015

April 27, 2016

CSR Reconciliation Technical Assistance Series

CMS
CENTERS FOR MEDICARE & MEDICAID SERVICES

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Intended Audience

- The intended audience includes issuers participating in the Consumer Operated and Oriented Plan (CO-OP) Program that received the Cost-Sharing Reduction (CSR) portion of the advance payments for the 2014 and/or 2015 benefit years.
- The purpose of this presentation is to educate and prepare CO-OPs in the ongoing CSR reconciliation process with CMS.

CSR Reconciliation Overview

Current CSR Status

- CMS is currently conducting reconciliation of CSR amounts paid in advance to issuers for the 2014 and 2015 benefit years. Issuers must submit CSR reconciliation data for any and every benefit year for which the issuer received advance CSR payments from CMS.
- Failure to submit CSR reconciliation data files for the 2014 and/or 2015 benefit years, as applicable, by the June 3, 2016 deadline will result in the issuer having to pay back to CMS the full amount of advanced CSRs it received for the benefit year.

CSR Background

- For each benefit year, CMS reconciles CSR payments first by collecting issuer data on what the enrollee in a CSR plan variation paid in cost sharing and what the enrollee would have paid in cost sharing in a standard plan. The difference is the amount of CSR provided.
  - CMS will then compare the amount of CSR provided to the enrollee to the CSR component of the advance payment provided to the issuer by the federal government.

CSR Reconciliation - Requirements

- In order to facilitate reconciliation of CSRs to reflect the amount provided to enrollees in CSR variation plans, issuers will submit their allowable EHB medical claims costs to CMS, broken down by:
  - The amount the issuer paid,
  - The amount the enrollee paid, and
  - The amount the enrollee would have paid for the same claims if enrolled in a standard plan.
    - Issuers will use one of two methodologies to determine enrollee cost sharing amounts for comparable claims in the standard plan.

CSR Reconciliation – Requirements (Continued)



Issuers will be required to submit different data elements based on which CSR reconciliation methodology (standard or simplified) they chose for their plans.

For the purposes of our file format, issuers using the simplified method should indicate “Simplified” if they are estimating parameters for some plans, but not all. Issuers should indicate “Simplified AV” if they are using the simplified AV method exclusively.

Timelines

CSR Reconciliation Timeline

Timing	Activity
January 2016	Instructional manual published on CMS website for 30 day comment period
January 2016	Specifications, Initial submission technical guide, and attestation forms published
February – March 2016	Final manual and specifications published. Webinars and training for all issuers
March 2016	Testing for all issuers ended March 25, 2016
April 1 – June 3, 2016	Data submission window for benefit years 2014 and 2015 *Note: Issuers should submit on or before May 2, 2016 to allow time for correcting their submission, if needed.*
June 30, 2016	CMS notifies issuers of reconciled amounts

Time Extension for File and Attestation Submission

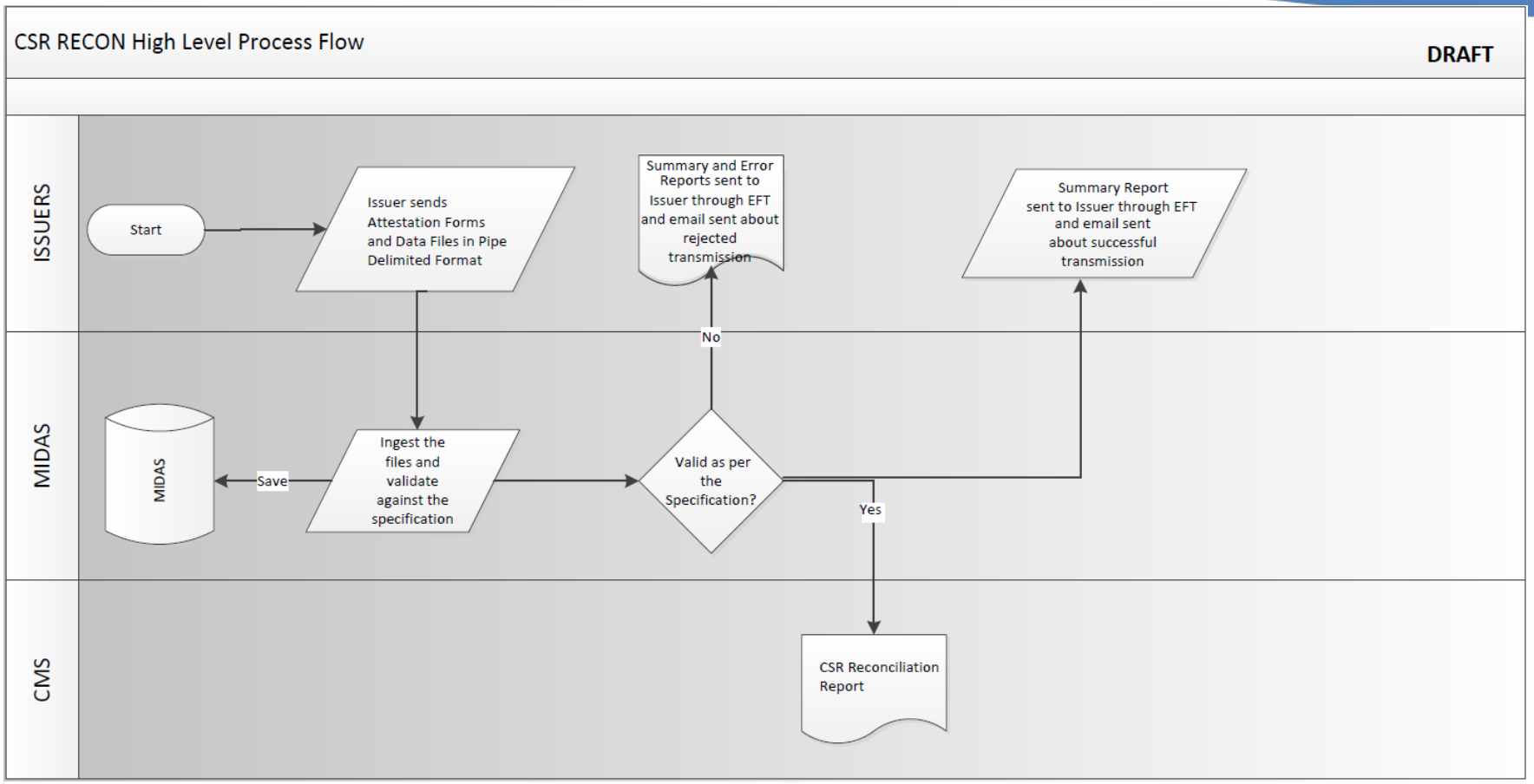
CMS recently released guidance on REGTAP and the CCIIO website extending the deadline for CSR reconciliation data submission to Friday, June 3, 2016 at 11:59 pm EDT.

We also established an interim data submission deadline of this coming Monday, May 2, 2016, 11:59 pm EDT.

- We are requiring all issuers to have submitted a data file to CMS by the interim deadline. **This applies to all CO-OPs, even those that are winding down.**
- The issuer will be deemed to be in compliance with the interim deadline, even if the file submitted fails CMS validations.
- Link to guidance: https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/Guidance-on-data-submission-deadlline-for-CSR-reconciliation-Final-4_15_16.pdf

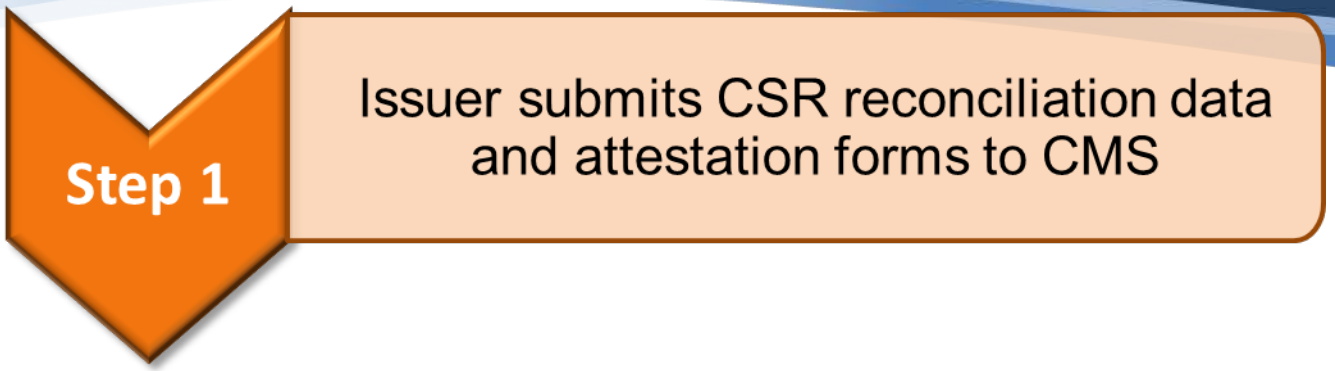
CSR Reconciliation Operational Process Overview

Data Submission Process Overview



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CSR Reconciliation Step I Activities



- CMS requires issuers to report CSR reconciliation data in an electronic file via the CMS Enterprise File Transfer (EFT) location.
- The file must be in pipe-delimited format and in ASCII text.
- The data elements in the file include issuer, plan, and policy level information.
- The CSR Reconciliation Issuer to MIDAS Inbound Specification document provides the technical specifications for the file.

CMS will only accept submissions through EFT.

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CSR Reconciliation Step I Activities
(Continued)

Step 1

Issuer submits CSR reconciliation data and attestation forms to CMS

- CMS also requires issuers to complete the attestation form(s) which are available on the CCIIO website.
- Issuers must upload or email attestations on the same timeline for submitting data files.
- Issuers will provide the following attestations:

Forms A, B & C submitted via EFT

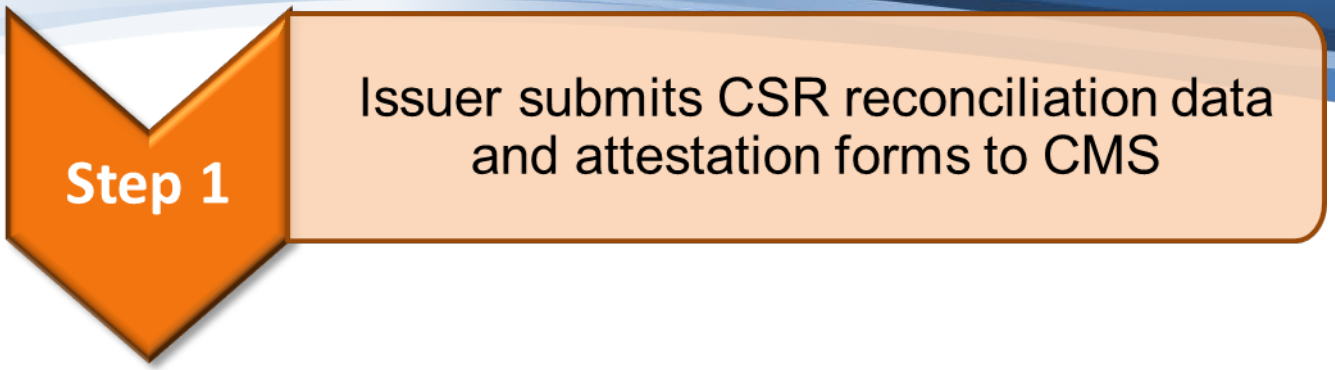
Form D emailed to shared CMS mailbox

- Attestation Form A: Allowed Costs for Essential Health Benefits (with the exception of issuers who estimated Allowed Costs for Essential Health Benefits)
- Attestation Form B: Estimate of Allowed Costs for Essential Health Benefits
- Attestation Form C: Simplified Methodology Effective Parameters and Formulas
- Attestation Form D: Cost-Sharing Reduction Amounts Submitted for Medical Loss Ratio and Risk Corridors Programs for the 2014 Benefit Year

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CSR Reconciliation Step I Activities
(Continued)

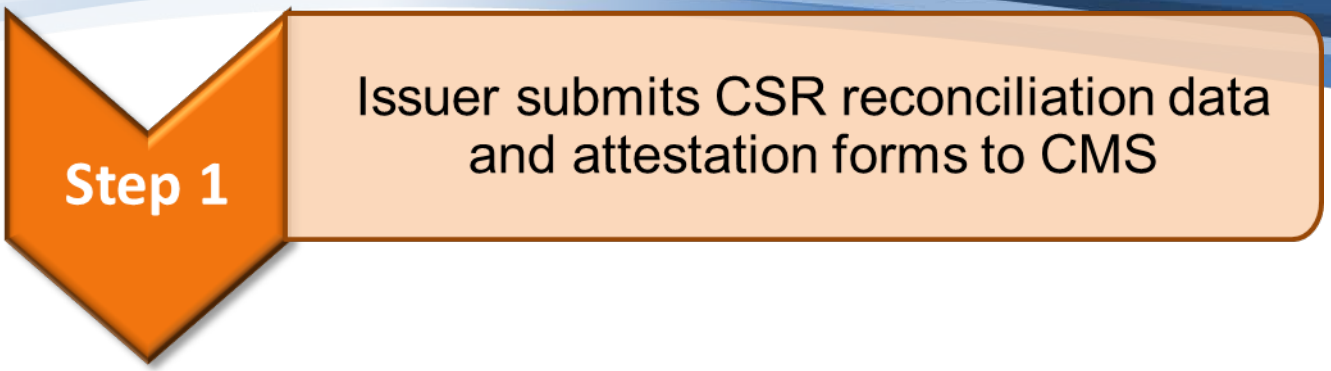


- Attestation forms must be completed and submitted separately from the data files.
- All issuers must complete either Attestation Form A or B, as applicable.
- Some issuers will also have to fill out Attestation Form C and D, as applicable.

The CSR Reconciliation Issuer to MIDAS Attestation Inbound Specification provides requirements to submit Attestation Forms A, B, and C through EFT.

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CSR Reconciliation Step I Activities
(Continued)



- Attestation Form D must be completed by issuers that submitted estimates of CSRs for the purpose of risk corridors and medical loss reporting for the 2014 Benefit Year.



Do not submit Attestation Form D through EFT.

Issuers must email a signed copy of Attestation Form D to CSRreconciliationattestations@cms.hhs.gov.

Please put "MLR RC Attestation" in the email subject line.

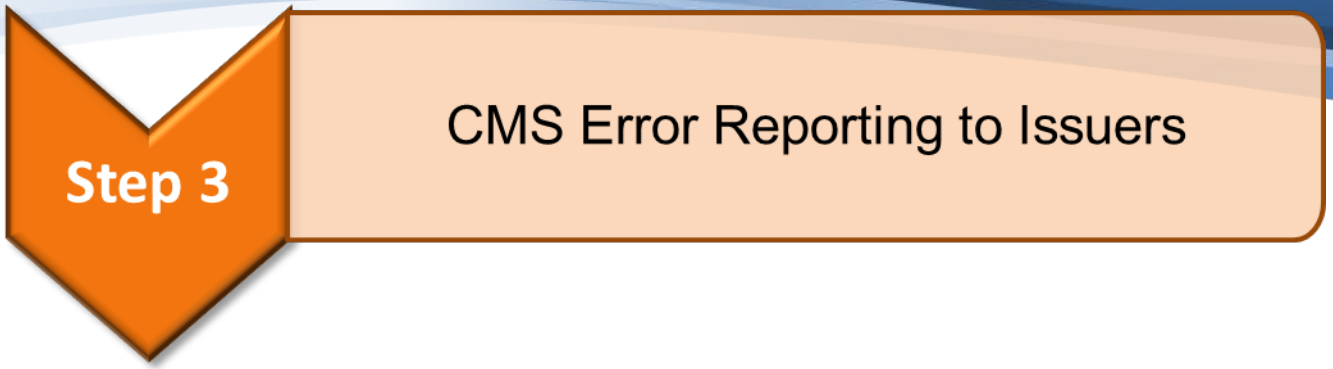
CSR Reconciliation Step II Activities

Step 2

CMS Data Validation

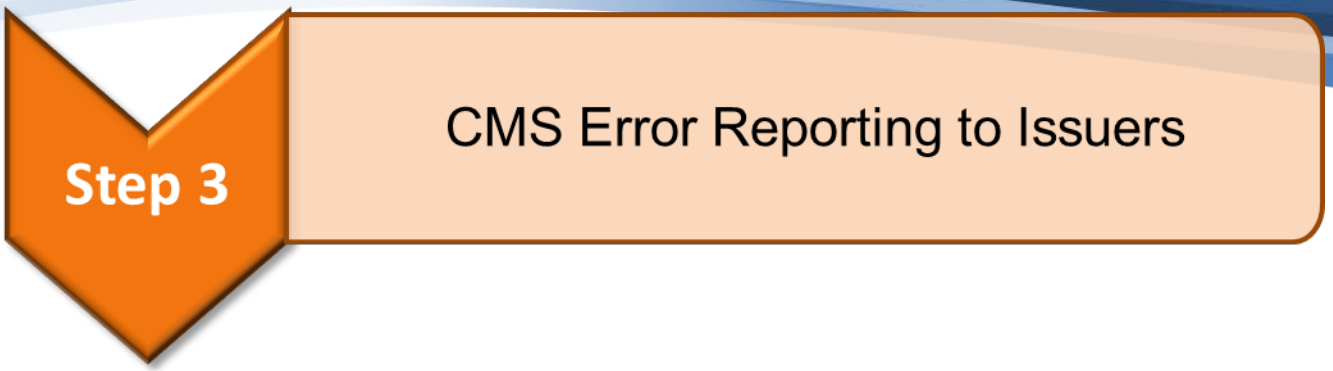
- CMS will perform a series of validations on the data and attestation forms.
  - **Based on feedback received from issuers, CMS does not intend to use premium information for data validation purposes. Instead, CMS will use other readily available data sources.**
- Issuers will receive an email confirming the status of their submission. Every issuer will receive a summary report in their EFT folder for all processing statuses, including successful submission without errors.
- Please refer to the CSR Reconciliation Issuer to MIDAS Inbound Specification documents for a list of validations that CMS will be performing on data files and attestation forms. CMS may perform additional validations and will follow up with additional guidance if needed.

CSR Reconciliation Step III Activities



- In addition to the summary report, issuers will receive a comprehensive error report in their outbound EFT folder if CMS rejected their file or accepted it but it has errors.
  - The file will be rejected when mandatory data elements are not included or are input incorrectly, or if critical validations fail, and the issuer will receive an email indicating that the file has been rejected and cannot be processed.
  - The file may be accepted and processed when other, non-critical validations fail, in which case the issuer will receive an email indicating that the file has been processed but there are errors.
- Issuers should review the summary and error reports to determine what corrections are needed, make the corrections, and resubmit the data files before the submission deadline.

CSR Reconciliation Step III Activities (Continued)



- When correcting data and resubmitting data files, issuers must re-submit the entire file (i.e., the full pipe-delimited file).
- CMS will consider every resubmission as a new submission, so the filename for the resubmission must be unique and include a new date and time.
  - CMS will not accept or process resubmissions with identical dates and times in the filename.

Because CMS will not process partial resubmissions, issuers should plan accordingly by saving their flat, pipe-delimited file in a separate environment so that it can be modified and resubmitted as necessary.

Data File Structure Overview

Data File Structure

- CMS will only accept data file submissions through EFT.
- The folder structure is applicable to both test and production. Differentiation is based on the .T or .P within the file name.
  - The filenames proposed for usage by issuers will consist of the following sections:
    - Trading Partner (TP) Identifier (ID)
    - Application ID
    - Function Code
    - Date
    - Time
    - Environment Code
    - Direction

Data File Structure (Continued)

- Data files must be submitted in pipe-delimited format.
- The data elements in the file will include three (3) levels of data, each with a specific set of information that must be included:
  - Issuer Summary Record (01)
  - Plan Summary Record (02)
  - Policy Detail Record (03)

File Format

Format of Pipe Delimited File

- For pipe delimited data files, the file format needs to be ASCII text with the use of a CRLF as the line terminator.
- Notepad and Textpad are examples of programs that can be used to create the pipe delimited file.
- If the rules above are not followed, issuers may receive file rejections and the associated error reports will say that the file structure is invalid.

Pipe-delimited Format Example

Example Pipe-delimited Format:

Issuer Summary Record

Plan Summary Record

Policy Summary Record

```
01|54631|VA|11512|20150702|14342556|2015|2.00|2.00|STANDARD|Y|20150702|11512|Y|11512|20150702|1|FIRSTNAME1|LASTNAME1|Email1@email.com|TPOC1|4063608629|POCFIRSTNAME1|POCLASTNAME1|Email2@email.com|BPOC1|4063608630

02|11512NC0060024|100.00|5.00|4.00|1.00|12.00|2.00|1

03|0000238689|20150702|20150702|100.00|S|10.00|10.00|10.00|4.00|10.00|12.00|2.00|11512NC0060024
```



Each field is separated by a pipe character.

Data File Submission Process

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Data File Submission

- Issuers will submit files to Multidimensional Insurance Data Analytics System (MIDAS) through EFT in pipe-delimited format using ASCII text and a CRLF as the line terminator.
- Issuers must submit only one (1) HIOS identifier per file.
- If an issuer is submitting data for multiple HIOS IDs, for example as the result of an acquisition, the issuer must create a separate file for each HIOS ID.
- The function code for the data submission will be CSRI.



Issuers must submit attestation forms and data files separately; CMS will accept and process the attestation forms and data files separately. Attestation forms and data files should also be submitted separately by benefit year.

Data File Submission (Continued)

- Possible outcomes for data file submissions include:
  - Successful submission (no errors)
  - Rejected submission
  - Accepted submission (errors sent to the Issuer)
- CMS will send email messages to issuers regarding status of files.
- CMS will provide issuers with an error log and summary report detailing any validation errors or file rejections.

Data Accuracy at the Issuer, Plan and Policy Levels

- CMS will sum the policy level (03) CSR amounts, and compare this sum to the amount the issuer received for the CSR component of advance payments for the benefit year. The expected CSR reconciliation amount will be displayed in the summary report provided to the issuer.
- This comparison will serve as the basis for the CSR reconciliation calculation.

Attestation Form Completion and Submission Process

Attestation Form – Requirements

- Issuers should complete attestation forms as appropriate, and submit the forms separate from the data files.
  - Attestation Forms A, B & C should be submitted via EFT.
  - Attestation Form D must be submitted by email to a shared CMS email address: **CSRreconciliationattestations@cms.hhs.gov**
- Issuers should upload or email attestations on the same timeline for submitting data files.
- The attestation forms are in Excel format. The forms should be sent in Excel format and be zipped together.
- All issuers must complete either Attestation Form A or B.
- Issuers should complete Attestation Forms C and D as necessary.
- **Signatures must be typed on each attestation form.**

Attestation Form– Requirements (Continued)

- The forms include instructions for submission:
  1. Issuers must upload a signed copy of the required form(s) to an EFT folder by **May 2, 2016** (with the exception of Attestation Form D, which should be emailed to a shared CMS mailbox).
     -(Issuers may include dummy data in the attestation forms they submit by May 2, 2016. **Issuers must submit the required attestation forms with valid attestations by the June 3, 2016 submission deadline.)**
  2. Issuers are required to submit a separate attestation form(s) for each benefit year CSR payments were received.
  3. Issuers are required to include name, title, organization, telephone, email address and signature on each form before submission (signature must be typed in the attestation form(s)).
- Forms are available at:
  - https://www.cms.gov/CCIIO/Resources/Forms-Reports-and-Other-Resources/index.html#Reports

Attestation Form A

- **Attestation Form A**: Issuers, with the exception of those that meet the regulatory criteria to estimate allowed costs for essential health benefits, must submit this form to attest that cost-sharing reduction amounts provided to enrollees and submitted for reimbursement represent only cost sharing for essential health benefits (EHB).

Attestation Form B

- **Attestation Form B:** Issuers that meet the regulatory criteria to estimate total allowed essential health benefits as allowed under 45 CFR 156.430(c)(2)(i)(A)-(B) must submit this form to attest both that they are eligible to estimate, and also that cost-sharing reduction amounts submitted for reimbursement represent only cost sharing for essential health benefits for which Federal reimbursement is permitted.

Attestation Form C

- **Attestation Form C:** Issuers that selected the simplified methodology on their data file submission must submit this form.
  - On the first Form C tab ("Attestation C Signature Page"), issuers attest to the accuracy of the effective cost-sharing parameters calculated for each standard plan and the formulas used in establishing cost-sharing reductions provided.
  - On the second tab ("Attestation C Parameters"), issuers must complete a parameters report for each standard plan for which they estimate parameters.
  - On the third tab ("Attestation C for AV Plans"), issuers must list each QHP - if any - for which they are using the simplified AV methodology. Issuers are not required to provide parameters on this form.

Attestation Form D

- **Attestation Form D**: Issuers that have submitted a certified estimate for CSRs provided for the purpose of risk corridors and medical loss ratio reporting for the 2014 Benefit Year must submit this form.

Attestation Form Structure Overview

CSR Reconciliation Issuer to MIDAS Attestation Inbound Specification File Structure

- **CSR Reconciliation Attestation Forms:**
  - CMS will only accept Attestation Form A, B, and C submissions through EFT.
  - For direct SFTP (for automation) - sftp://eft.feps.cms.gov
    - When using SFTP, send files using the “Inbound 30” folder.
- The folder structure is applicable to both test and production. Differentiation is based on the .T or .P within the file name.
  - The filenames proposed for usage by Issuers will consist of the following sections:
    - Trading Partner (TP) Identifier (ID)
    - Application ID
    - Function Code
    - Date
    - Time
    - Environment Code
    - Direction

CSR Reconciliation Attestation Form Structure



All the sections of the filename must be separated by a period (.)

Example filename:

CSRATI.12345678.D151027.T123136760.P

CSR Reconciliation Attestation Form Structure (Continued)

- Issuers will create a ZIP file with all of the attestation forms*.
- Issuers will create an attestation form for **each attestation type per benefit year**.
- The ZIP file containing the attestations will be named as: **CSRATI.<<tpid>>.Date.Time.P**
- The attestation file will be named as: **Attestation<<A/B/C>>_benefitYear_HIOSID**.
- The worksheets inside the file will be the name of the forms, such as Attestation A, Attestation B or Attestation C.
- CMS will not accept partial submission of attestation forms.

*With the exception of Attestation Form D.

Suggestion

Suggestion

If a CO-OP is working with a TPA to submit their data file, we strongly encourage the TPA not wait until the final June 3rd deadline to submit the file due to the high initial file error rate.

Reminders

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Reminders

- CMS has established an interim deadline of May 2nd 2016, by which time we expect every issuer to have submitted a CSR reconciliation data file. Data files submitted by the interim deadline do not have to pass validation, but the issuer should still attempt to send a file to CMS.
- Co-Ops that are no longer in the market or that are on payment hold are still responsible for file submission to reconcile advanced CSRs received for a benefit year. For example, if a Co-Op received advance CSR payments in 2014, but was no longer accepting new enrollment for 2015, it must still submit CSR reconciliation data for 2014 (in addition to submitting for any time period in 2015 during which advance payments were received).

Reminders

- **Because CMS will not process partial resubmissions, issuers should plan accordingly by saving their flat, pipe-delimited file in a separate environment so that it can be modified and resubmitted as necessary.**
- If an issuer identifies errors in the data files they have submitted to CMS the issuer should correct and resubmit their data files to CMS before the submission window closes on Friday, June 3, 2016 at 11:59 pm EDT.
- Issuers may resubmit data files as many times as needed prior to the submission window closing.

Reminders

- If issuers are having trouble with the file name requirements and sending files without suffixes (i.e., with “.zip” or “.txt” suffixes), try to rename files using the file name convention after creating the file.
  - File name convention for data files:
    - 12345678.MID.CSRI.D160415.T123136760.P.IN
  - File name convention for attestation files:
    - 12345678.MID.CSRATI.D160415.T145543452.P.IN
- Files will be rejected by the EFT if they have additional characters included in the file name.

Reminders

- Testing is occurring in MIDAS's production environment, so **issuers should submit all test files with a .P filename extension.**
- Issuers should receive a confirmation email and summary/error report within 24 hours of submitting a test file. Please email CMS at CSRreconquestions@cms.hhs.gov if you have not received the summary/error report in your EFT.

Updates

Processing Times

- In general, most files are being processed within 24 hours of submission.
- However, if CMS receives a large volume of files at the same time, and/or if there are large data files in the processing queue, processing may take somewhat longer than 24 hours.

Reminder

Contacting CMS about CSR Reconciliation Questions

- Please do not send your questions to multiple contacts in CMS. We are trying to respond to all questions that have been sent to the CSRreconquestions@cms.hhs.gov mailbox, but a large volume of duplicate inquiries results in longer response times.
- Thank you for your patience as we work to respond to your open questions.

CSR Technical Assistance Trainings

- The Centers for Medicare & Medicaid Services (CMS) will continue to host technical assistance sessions through April and May of 2016.
- As part of this series, CMS will conduct question and answer sessions three times a week until June 3:
  - Monday from 4:00 – 5:00 p.m. EDT
  - Wednesday from 3:00 – 4:00 p.m. EDT
  - Friday from 2:00 – 3:00 p.m. EDT

Q&A

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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*

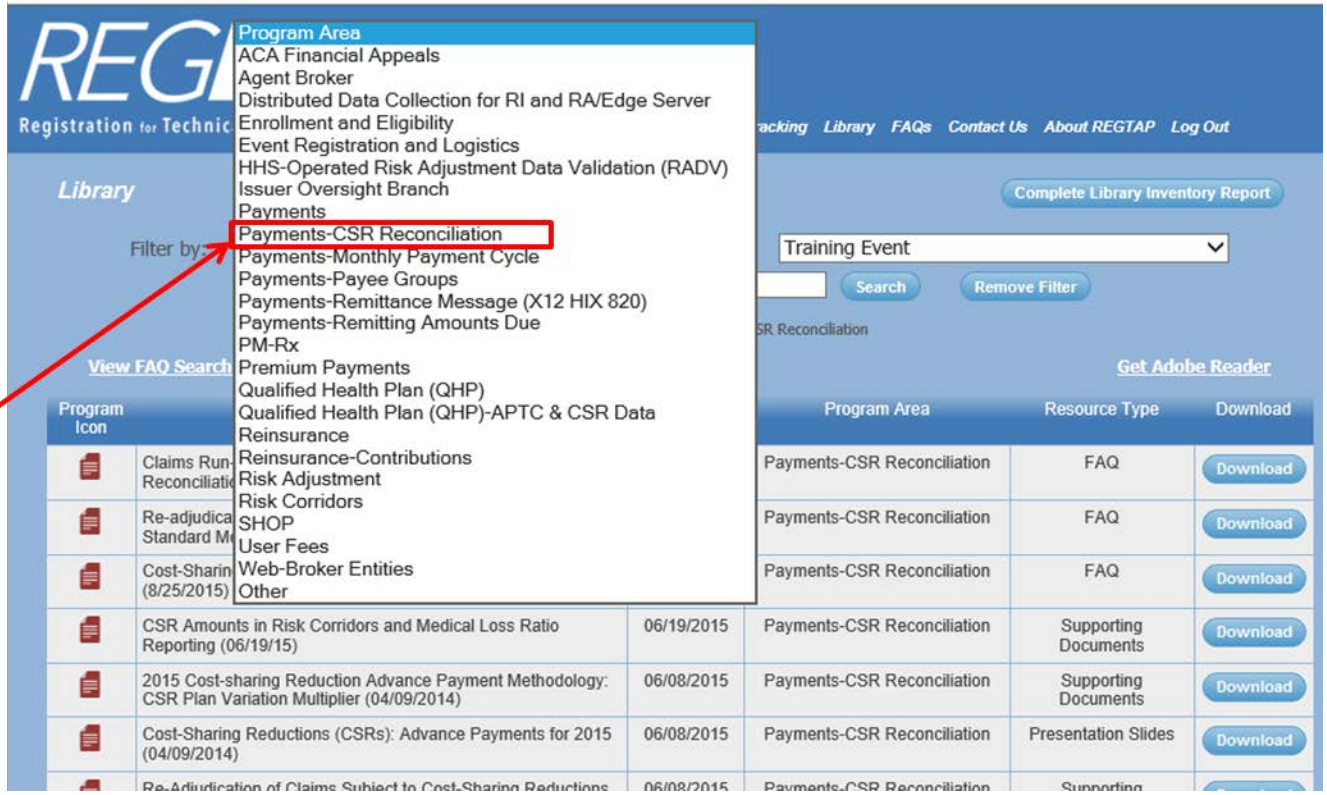
Resources

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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"



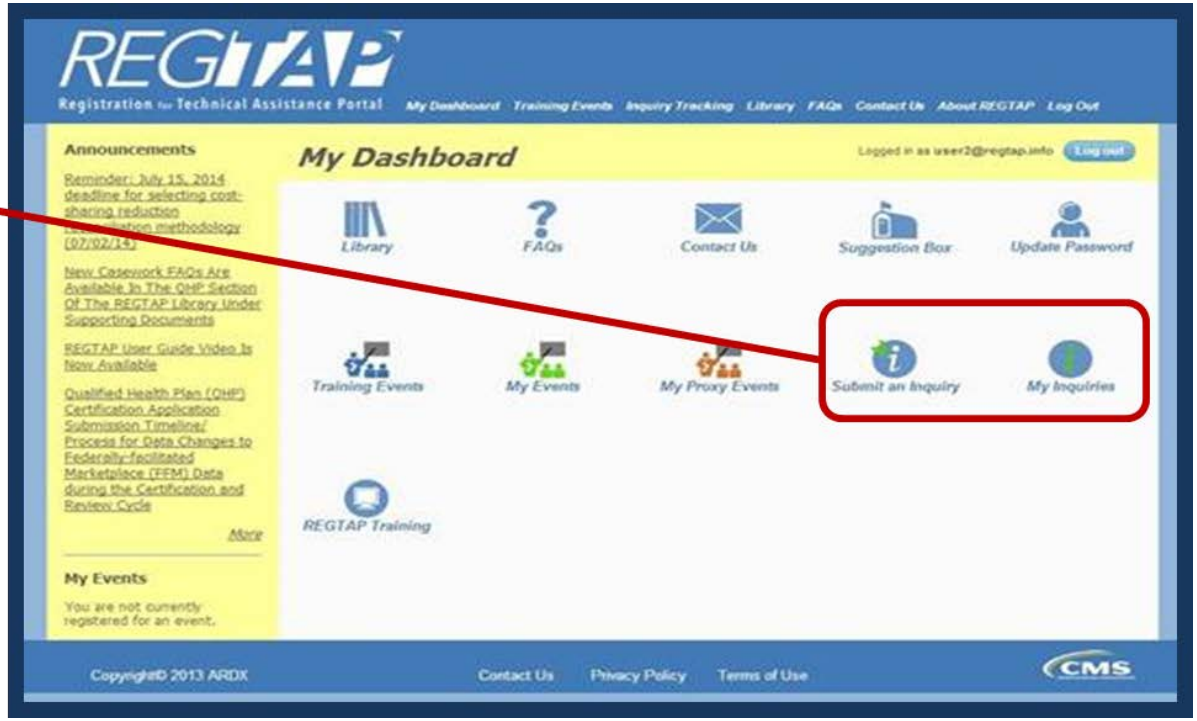
Resources

Resource	Resource Link
U.S. Department of Health & Human Services (HHS)	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)

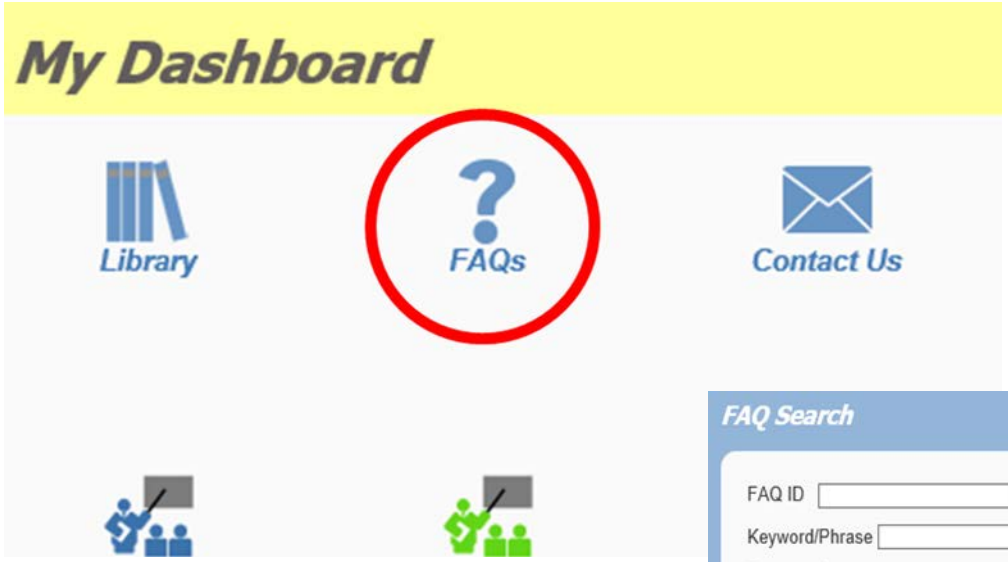
Stakeholders can submit inquiries to https://www.REGTAP.info through ITMS.

Select ‘Submit an Inquiry’ from My Dashboard.



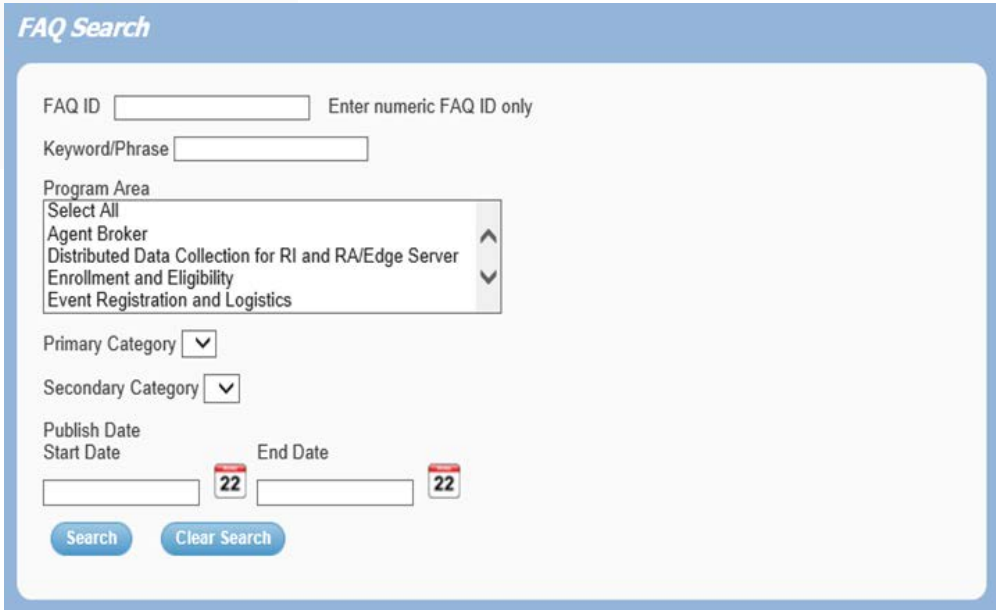
Note: Enter only one (1) question per submission.

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

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