

April 6 & April 9, 2020

Cost-sharing Reduction (CSR) Data Submission for Benefit Year (BY) 2019 and BY 2018 Restatements

Health Insurance Exchange Program Training Series



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Agenda

- Session Guidelines
- Cost-sharing Reduction (CSR) Data Submission Overview
- Timelines
- CSR Data Submission Processes Overview
- Data File Structure Overview
- Data File Submission Process
- Restatements
- Attestation Form Completion and Submission Process
- Question and Answer (Q&A)
- Resources
- Closing Remarks

Session Guidelines

- This is a 60 minute webinar session.
- For questions regarding content, please submit inquiries to the CSR Data Submission team at CSRreconquestions@cms.hhs.gov
- For questions regarding logistics and registration, please contact the Registrar at: (800) 257-9520.

New Webinar Platform

- Use Internet Explorer (IE) when accessing the new web platform.
- Test your system's compatibility, use the following link:
http://engage.vevent.com/microsite/ext/self_test.jsp?eid=140
- If you cannot hear today's audio or having other technical issues, please contact the Registrar Support Team at registrar@regtap.info or 1 (800) 257-9520.

New Audio Bridge Platform

- **Can I still use a telephone or cell phone to listen?**

Yes, you may dial in to 1-866-445-7153 using a cell phone or landline; however, you also have the option to listen through your computer or smart device using speakers or headphones. If you are listening through your phone, you will want to mute the sound on your computer.

- **How do I adjust the volume for the event?**

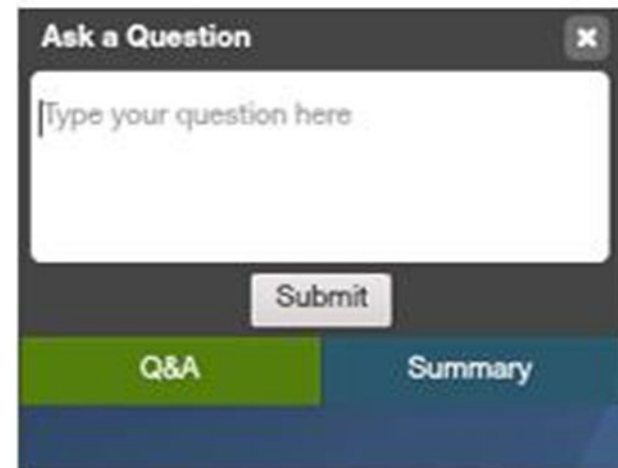
Please adjust your volume to the desired setting using the volume settings on your device. Please ensure the volume is not muted.

- **Can I make the picture larger on my screen?**

Yes, you may maximize your screen by selecting view, located in the upper left corner menu bar, then select the full-screen option or perform Alt + Enter on your keyboard.

New Webinar Platform (continued)

- To submit questions, use the Q&A panel, and CMS Subject Matter Experts will respond during the webinar or afterwards, as needed.

A screenshot of a web interface titled "Ask a Question" in a dark grey header bar with a close button (X) in the top right corner. Below the header is a large white text input field with the placeholder text "Type your question here". To the right of the input field is a grey "Submit" button. Below the input field and button are two tabs: a green "Q&A" tab and a blue "Summary" tab. The "Q&A" tab is currently selected and highlighted.

Intended Audience

- The intended audience includes Issuers that will be submitting data regarding Cost-sharing Reduction (CSR) payments for benefit year (BY) 2019 and/or Issuers restating CSR payment data for BY 2018.
- The purpose of this presentation is to educate and prepare Issuers who will be participating in the CSR data submission process with CMS.

Purpose

- This stakeholder training session will:
 - Explain the CSR data submission process and timelines.
 - Discuss the requirements Issuers must follow to submit CSR data and attestation files, including the process and file format requirements.

CSR Data Submission Overview



CSR Background

- 45 CFR 156.430 sets forth regulations regarding CSR data submission and reconciliation.
 - Under §156.410, QHP Issuers must ensure that any individual enrolled through the Exchange, who is eligible for CSRs, pays only the cost sharing required for the applicable covered service under the plan variation.
 - In the case of improper assignment to a plan variation or improper cost sharing, the Issuer must correct the plan variation assignment and refund any excess cost sharing paid by the consumer. Issuers cannot submit as CSR provided any excess cost sharing provided.

CSR Background (continued)

- For each BY, CMS reconciles CSR payments by collecting Issuer data on what the enrollee in a CSR plan variation paid in cost sharing for the entire BY and what the enrollee would have paid in cost sharing with a standard plan. The difference is the amount of CSR provided.

CSR Data Submission - Requirements

- In order to facilitate reconciliation of CSRs to reflect the amount provided to enrollees in CSR variation plans, Issuers will submit their allowable essential health benefits (EHB) medical claims costs to CMS for the entire BY, 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.
- **For BY 2019 and BY 2018 Restatements, Issuers must use the standard methodology to determine enrollee cost sharing amounts for comparable claims in the standard plan.**
- Issuers must submit this data for each QHP plan for BY2019 and if applicable, separately for BY 2018 restatements.

For Benefit Year (BY) 2019

- No testing window
 - Consistent with last couple years.
 - We encourage issuers to submit files early and often to obtain successful submission.
- Data submission timeline
 - **For all issuers who want to participate
April 6, 2020 – May 29, 2020**

For Benefit Year (BY) 2019 (continued)

- Issuers must use the CMS standard methodology to calculate the value of cost-sharing reductions provided for each enrollee throughout the 2019 benefit year, and must also use the standard methodology if restating for benefit year 2018.
- **NOTE:** Issuers will be allowed to submit 2018 benefit year restatement data, except for those issuers who have had, whether by stipulation or otherwise, a 2018 benefit year CSR judgment entered in their favor by the Court of Federal Claims.

CSR Landscape

- In October 2017, CMS announced that CSR payments will be discontinued until an appropriation exists. In the absence of an appropriation, CMS cannot make CSR reconciliation payments resulting from the BY 2019 data submission process and BY 2018 restatement process.
- CMS is permitting issuers an optional window to submit CSR data for the 2019 benefit year and permitting restatements for the 2018 benefit year.

Transferring Accumulators

- When transferring accumulators under 45 CFR 156.425(b), Issuers (when possible and practical) should transfer an enrollee's accumulated cost sharing in the order in which cost sharing is required in the new plan.
 - For example, if the original plan does not have a deductible and the new plan has a deductible, the Issuer should first transfer amounts for any type of cost sharing incurred by the consumer in the original plan to the new plan's deductible.

List of Materials Released by CMS

To assist QHP Issuers in the CSR Reconciliation Process, CMS is updating the following resources below.

Resource	Resource Link
CSR Reconciliation Issuer to MIDAS Attestation Inbound Specification	https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/CSR-Reconciliation-Issuer-to-MIDAS-Attestation-Inbound-Specification-BY2018.pdf
CSR Reconciliation Issuer to MIDAS Inbound Specification	https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/CSR-Reconciliation-Issuer-to-MIDAS-Inbound-Specification-BY2018.pdf
CSR Reconciliation Data File Error Code List	https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/CSR-Reconciliation-Data-File-Error-Code-List-BY2018.pdf
CSR Reconciliation Attestation File Error Code List	https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/CSR-Reconciliation-Attestation-Error-Code-List-BY2018.pdf

List of Materials Released by CMS (continued) - CSR Reconciliation Attestation Forms for BY 2019 and BY 2018 Restatements

Attestation Form	Resource Link
Attestation Form A – Benefit Year 2019	https://www.cms.gov/CCIIO/Resources/Forms-Reports-and-Other-Resources/index.html
Attestation Form B – Benefit Year 2019	https://www.cms.gov/CCIIO/Resources/Forms-Reports-and-Other-Resources/index.html

UPDATES:

- Updated Attestation Forms A and B will be placed at the link above to be used for BY 2019 and/or BY 2018 restatements.
- **NOTE:** Issuers should note that there are no file structure changes from last year's data submission window to this year's, except for the benefit year.

Timelines



Timing of BY 2019 Data Submission Calendar

Timing	Activity
April 6, 2020	Submission window opens for all issuers for benefit year 2019 data submission and benefit year 2018 restatements. NOTE: As stated earlier, Issuers will be allowed to submit 2018 benefit year restatement data, except for those issuers who have had, whether by stipulation or otherwise, a 2018 benefit year CSR judgment entered in their favor by the Court of Federal Claims.
May 29, 2020	Submission window closes for benefit year 2019 data submission and benefit year 2018 restatements.
June 2020	CMS notifies issuers of CSR amounts.

CSR Reconciliation POC Submissions

- Issuers should email CSRReconquestions@cms.hhs.gov if their technical or business points of contact (POC) changed since the benefit year 2018 process.
- Issuers who have not already provided their points of contact should provide the points of contact by **April 13, 2020**.

CSR Reconciliation POC Submissions (continued)

- The CSR reconciliation POCs will receive attestation and confirmation emails and any other CSR data submission related outreach CMS performs.

CSR Data Submission Process Overview



CSR Data Submission Process for BY 2019 and BY 2018 Restatements

- For BY 2019 data submission and BY 2018 restatements, the CSR data submission process and requirements – including data and attestation file data elements, data and attestation file structure, validations, and error codes - are largely the same as the past couple years.
 - Only minimal updates were made to update the BY to allow Issuers to submit files for BYs 2019 and 2018 restatements.

CSR Data Submission Step I Activities: Issuer Submits Data and Attestation Forms to CMS

- CMS requires Issuers to report CSR 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 (optional), and policy level information.
- The CSR Reconciliation Issuer to MIDAS Inbound Specification document provides the technical specifications for the file.
- **CMS only accepts submissions through EFT.**

CSR Data Submission Step I Activities: Issuer Submits Data and Attestation Forms (continued)

- CMS also requires Issuers to complete the Attestation Form(s) which are available at:
<https://www.cms.gov/CCIIO/Resources/Forms-Reports-and-Other-Resources>
- CMS strongly encourages that Issuers wait to submit their Attestation Form(s) until after they have submitted their final data file and confirmed the data file has a status of Accepted or Accepted with Errors.
- Issuers will submit Attestation Forms via EFT.
 - 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

CSR Data Submission Step I Activities: Issuer Submits Data and Attestation Forms (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.
- Issuers complete the applicable Attestation Forms available at: <https://www.cms.gov/CCIIO/Resources/Forms-Reports-and-Other-Resources> The CSR Reconciliation Issuer to MIDAS Attestation Inbound Specification provides requirements for how Issuers submit the Attestation Forms through EFT, as well as the file format and business validations that MIDAS performs on the Attestation Forms.

CSR Data Submission Step II Activities:

CMS Data Validation

- CMS will perform a series of validations on the data and Attestation Forms.
- Issuers will receive emails confirming the status of their data and attestation file submissions.
 - Confirmation emails for data files are sent to the business and technical POCs. Every Issuer will receive a report in their EFT folder for all data file processing statuses (Accepted and Processed, Accepted with Errors, or Rejected).
 - They will be sent to the POC email addresses the Issuer included in their data file.
 - Confirmation emails for attestation files are sent to the POC email addresses CMS has on file.
- Please refer to the CSR Reconciliation Issuer to MIDAS Inbound Specification document for a list of validations that CMS performs on data and attestation files. CMS may perform additional validations and will follow up with additional guidance if needed.

CSR Data Submission Step III Activities:

CMS Error Reporting to Issuers

- Possible data file statuses include Accepted, Accepted with Errors, or Rejected. If the file is Rejected or Accepted with Errors, the error report will include a comprehensive list of the data file 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.
 - The file will be Accepted with Errors when other, non-critical validations fail, in which case the Issuer will receive an email indicating that the file has been accepted and processed but there are errors. CMS will generate an error report that summarizes the non-critical errors, which are informational and do not affect CMS's processing of the CSR recon data submitted.
- Issuers should review the error reports to determine what corrections are needed, make the corrections, and resubmit the data file(s) before the submission deadline.
- If attestation files are rejected, the error codes associated with the rejection will be communicated within the confirmation email for the attestation files.

CSR Data Submission Step III Activities:

CMS Error Reporting to Issuers (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.
 - When using SFTP, send files using the “Inbound 30” folder.
 - Issuers must use “.P” in the file name for files. The data file names must consist of the following sections:
 - Trading Partner (TP) Identifier (ID)
 - Application ID
 - Function Code
 - Date
 - Time
 - Environment Code
 - Direction

Data File Structure (continued)

- The data file includes three (3) record levels of data elements, each with a specific set of information that must be included:
 - Issuer Summary Record (01)
 - Plan Summary Record (02) *Optional*
 - Policy Detail Record (03)
- There are no changes to the data elements or lay out of data elements in the file format [besides updates to the benefit year(s)].

(01) Issuer Summary Record

- The **(01) Issuer Summary Record** contains information on aggregate amounts of EHB claims, amounts paid by policy holders, the Issuer, and CSR provided for all QHPs under this Issuer.
- **Issuer Summary Records must have 28 fields.**
- **Sample Issuer Summary Record Format:**

01|54631|VA|11512|20190501|103256|2018|2.00|5.00|STANDARD|Y|0601201
6|11512|N||FIRSTNAME1|LASTNAME1|[Email1@email.com](#)|TPOC1|4063608
629|POCFIRSTNAME1|POCLASTNAME1|[Email2@email.com](#)|BPOC1|406360
8630|1|1

(01) Issuer Summary Record (continued)

This table lists the data elements and position of data elements in the **Issuer Summary Record**.

Note: Because CMS did not make advance payments for BY 2019, the field for total amount advanced by CMS will be set to zero.

Issuer Summary Record DataElements					
FieldName	Position	FieldName	Position	Field	Position
Record Code	101	Acquisition	111	Technical POC Organization Title	120
Trading PartnerID	102	Acquisition Effective Dates	112	Technical POC Phone Number	121
Issuer State Code	103	Acquiring Issuer	113	Business POC First Name	122
HIOSID	104	Merger	114	Business POC LastName	123
Issuer Extract Date	105	MergerIssuer	115	Business POC EmailAddress	124
Issuer Extract Time	106	Merger Effective Dates	116	Business POC Organization Title	125
Benefit Year	107	Technical POC First Name	117	Business POC Phone Number	126
Total Actual CSR Amount	108	Technical POC LastName	118	Total number of CSR Variant Plans under HIOS ID	127
Total CSR Amount Advanced to the Issuer by CMS	109	Technical POC Email Address	119	Total number of Exchange-assigned Subscriber IDs in all CSR Variant Plans under this HIOS ID	128
Reconciliation methodology	110				

(02) Plan Summary Record

- The **(02) Plan Summary Record** includes plan-related data elements such as a list of all QHPs and financial amounts, selected for the applicable BY.
- **Plan Summary Records are optional.**
- **Sample Plan Summary Record Format:**
02 | 11512NC006002403 | 0.00 | 5.00 | 4.00 | 1.00 | 2.00 | 1.00 | 1

(02) Plan Summary Record (continued)

The table below lists the data elements and position of data elements in the **Plan Summary Record**. These elements have not changed since last year. Plan Summary Records are optional.

Plan Summary Record Data Elements	
Field Name	Position
Record-Code	201
QHP ID	202
Total Annual Premium	203
Total Allowed Costs for EHB	204
Total Actual Amount the Issuer Paid for EHB	205
Total Actual Amount Paid For EHB by Enrollees	206
Total actual amount for EHB enrollees would have paid in the standard plan	207
Total actual value of CSR Provided	208
Total number of Exchange Subscriber IDs in this plan variation for the benefit year	209

(03) Policy Detail Record

- The **(03) Policy Detail Record** includes policy-related data elements for all qualified health plans (QHPs) and financial amounts.
- **Policy Detail Records must have 17 fields**
 - **Three fields are no longer applicable and need to be either blank (text field) or zero (numerical field), underlined below.**
- **Example Policy Summary Record Format:**
 - 03|0000238689|1234567890|20180701|20181231|11512NC006002403|20160701|20161231|0.00|<blank>|0|0|10.00|6.00|4.00|6.00|2.00

(03) Policy Detail Record (continued)

This table lists the data elements and position of data elements in the **Policy Detail Record**.

Note: There are no changes to these elements from last year.

Policy Detail Record Data Elements

Field Name	Position	Field Name	Position
Record Code	301	Self Only/Other than self-only	310
Exchange-assigned Subscriber ID	302	Annual limitation on cost sharing for the standard plan	311
Exchange-assigned Policy ID	303	Actuarial value amount of the Standard Plan	312
Exchanged-assigned Policy Start Date	304	Total allowed costs for EHB	313
Exchange-assigned Policy End Date	305	Actual amount the issuer paid for EHB	314
QHP Plan ID	306	Actual amount the enrollee(s) paid for EHB	315
Plan Benefit Start Date	307	Actual amount the enrollee(s) would have paid under the standard plan	316
Plan Benefit End Date	308	Actual CSR Provided	317
Total Monthly Premium	309		

Optional Data Elements

- If Issuers are not populating optional data elements in a record, Issuers must ensure they populate the preceding and proceeding pipe delimiters for the data element.
 - (01) Issuer Summary records must have **28 fields**.
 - (02) Plan Summary records, if included, must have **9 fields**.
 - (03) Policy Detail records must have **17 fields**.
 - Issuers may populate a space in between the pipe delimiters, although a space is not required.

Data Accuracy at the Issuer, Plan, and Policy Levels

- Preliminary valid CSR and CSR charge amounts will be displayed in the error report sent to the Issuer.
- **Valid CSR and CSR charge amounts, including revised amounts resulting from restatements, in error reports are preliminary. CMS will notify issuers of their CSR amounts, based on the data in the Issuer's most recent acceptable (Accepted or Accepted with Errors) data file as of the submission deadline.**

Data Accuracy at the Policy Level

- CMS considers (03) Policy Detail records to be valid if they have a valid QHP ID, valid Exchange-assigned subscriber ID, and the records meet file format/structural requirements.
 - For purposes of validating QHP IDs, CMS verifies that the QHP ID had enrollment for the benefit year.
 - For purposes of validating Exchange-assigned subscriber IDs, CMS verifies the ID against enrollment reconciliation data for the benefit year.
- Issuers will receive error code CSRIFIL50 for invalid Exchange-assigned subscriber IDs and error code CSRIFIL67 for invalid QHP IDs.
- CMS does not include CSR Provided for invalid (03) Policy Detail records in the calculation of the issuer's final valid CSR and CSR charge amounts for the BY.

Data File Submission Process



Data File Submission

- Issuers will submit files to 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 and BY per file.
- If an Issuer is submitting data for multiple HIOS IDs 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 files and data files separately by HIOS ID and benefit year. CMS will accept and process the attestation files and data files separately.

Data File Submission (continued)

- Possible statuses for data file submissions include:
 - Accepted and Processed
 - Accepted with Errors
 - Rejected
- CMS will send confirmation email messages to issuers regarding status of files.
- CMS will provide issuers with an error report for each file submitted detailing any file format or validation errors.

Data File Submission Scenario # 1

Successful Submission

Scenario 1	Status	Email Message Sent to the Business and Technical POCs in the data file
Data file has been accepted.	DATA FILE ACCEPTED AND PROCESSED SUCCESSFULLY	CMS has processed your CSR reconciliation data file submission. Your data file submission passed all CMS validation checks. Your data submission will be marked as complete contingent on your attestation(s) submission being accepted and processed successfully. You will receive a summary report in your EFT folder within the next 24 hours that includes your preliminary CSR reconciliation amount, which was calculated based on the data you have submitted to date. Please review the report. It will include any QHP IDs for which you have not submitted data, if applicable.

Data File Submission Scenario # 2

Submission Accepted, but with Errors

Scenario 2	Status	Email Message Sent to the Business and Technical POCs in the data file
Data file has been accepted and processed, but it has errors.	DATA FILE ACCEPTED BUT WITH ERRORS	CMS has processed your CSR reconciliation data file submission, but the file has errors. You will receive an error report in your EFT folder within the next 24 hours that summarizes the errors. Review the error report to determine if you need to correct the data, in which case you should resubmit the entire file to CMS. Additionally, the report includes your preliminary CSR reconciliation amount, which was calculated based on the data you have submitted to date. The report will also include any QHP IDs for which you have not submitted data, if applicable.

Data File Submission Scenario # 3

Submission Rejected

Scenario 3	Status	Email Message Sent to the Business and Technical POCs in the data file
Data file has been rejected.	DATA FILE REJECTED	CMS has rejected your CSR reconciliation file submission due to formatting or other critical errors. You will receive an error report in your EFT folder within the next 24 hours that summarizes the errors. Review the error report to determine what you need to correct, and then resubmit the entire file to CMS. All data resubmissions must include the required attestations in order for your submission to be considered complete.

Restatements



Restatements

- Similar to past years, Issuers may restate BY 2018 amounts of CSR provided to maintain data accuracy. Also, Issuers whose recalculated data results in a charge owed to CMS must submit restatements.
 - **NOTE:** However, As stated previously, Issuers will not be allowed to submit 2018 benefit year restatement data, if they have had, whether by stipulation or otherwise, a 2018 benefit year CSR judgment entered in their favor by the Court of Federal Claims.

Restatements (continued)

- Issuers restating CSRs for 2018 should submit complete data files in the same manner and using the same file format as BY 2019.
 - Data files for restatements must be submitted separately by HIOS ID and BY. Data files for restatements must be a full file.
 - Restatements must be in the file format outlined in this presentation. MIDAS will not process files in the old file format.
- Restatements can apply to policies previously reported to CMS for a prior BY as well as new policies (policies that were in force but not formerly reported to CMS for reconciliation of that BY).

Restatements (continued)

- Restatements should not include data for which a discrepancy or request for reconsideration was previously submitted and denied by CMS.
- Issuers must submit the applicable Attestation Form(s) that correspond with the BY being restated.
- Issuers will receive an updated CSR reconciliation report for the restated HIOS ID and BY.
- For complete information on restatements, please see the Manual for Reconciliation of the Cost-Sharing Reduction Component of Advance Payments for Benefit Year 2017, available at:
<https://www.cms.gov/CCIIO/Resources/Forms-Reports-and-Other-Resources/Downloads/Final-CSR-Reconciliation-Guidance-BY2017.pdf>

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.
- All issuers must complete either Attestation Form A or B.
 - All Attestation Forms should be submitted via EFT.
 - The process for submitting attestations has not changed from last year.
- Issuers should upload attestations after confirming successful submission of final data files.
- The Attestation Forms are available on the CCIIO website. Separate forms have been created for each form type.

Attestation Form – Requirements (continued)

- The forms are in Excel format. The forms for each BY should be sent in Excel format and be zipped together.
- **Signatures must be typed on each attestation form.**
- The forms include instructions for submission:
 1. Issuers must upload a signed copy of the required form(s) to an EFT folder by **May 29, 2020**.
 2. Issuers are required to submit separate Attestation Form(s) for BY 2019 and BY 2018 restatements.
 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)).
- We strongly encourage Issuers to submit final data files first and confirm successful submission (Accepted or Accepted with Errors), before submitting attestation files to avoid having to submit attestation files multiple times.

Attestation Form A

- Issuers, with the exception of those that are estimating allowed costs for EHBs, must submit this form to attest that CSR amounts provided to enrollees represent only cost sharing for EHBs.

Attestation Form A (continued)



Department of Health and Human Services
Centers for Medicare & Medicaid Services

Issuers must attach a cost-sharing reduction amount provided on this form to its cost-sharing for EHBs that may be included in the issuer's cost-sharing reductions provided (in the case of fee-for-service providers, these amounts must have been passed through by the issuer to such providers pursuant to 45 CFR 156.430(c)(5)). [1] NOTE: Issuers that are estimating EHBs must use Attestation Form B.

Instructions: Issuer must upload a signed copy of this form to an EFT folder by May 29, 2020. Signatures may simply be typed in the form. Please submit a separate attestation for each benefit year advance cost-sharing reduction payments were received.

Benefit year: _____

Select Benefit Year

Enter Issuer
Name

HIOS Issuer ID:² _____

Enter HIOS ID

I certify in my capacity as actuary (or authorized delegate of actuary) of [(Issuer Name)] as indicated below:

• I have reviewed the information on cost-sharing reduction amounts provided as calculated under the Standard Methodology and submitted to the Centers for Medicare & Medicaid Services (CMS). I further certify that to the best of my knowledge, information, and belief, the information provided is accurate and that cost-sharing reduction amounts represent only cost-sharing reductions paid for essential health benefits that are permitted to be included in the cost-sharing reductions provided, as described in Section 1303 of the Patient Protection and Affordable Care Act (in the case of fee-for-service providers, these amounts must have been passed through by the issuer to such providers, pursuant to 45 CFR 156.430(c)(5)). I understand the information included in this submission is the basis for calculating cost-sharing reduction amounts provided by my organization to eligible enrollees.

Name of the Person Completing this Form: _____

Title: _____

Organization: _____

Telephone: _____

ext: _____

Email Address: _____

Signature: _____

(type)

Date Signed: _____

example: MM/DD/YYYY

¹ See 45 CFR 156.430(c)(5) Reimbursement of providers. In the case of a benefit for which the QHP issuer compensates an applicable provider in whole or in part on a fee-for-service basis, allowed costs associated with the benefit may be included in the calculation of the amount that an enrollee(s) would have paid under the standard plan without cost-sharing reduction only to the extent the amount was either payable by the enrollee(s) as cost sharing under the plan variation or was reimbursed to the provider by the QHP issuer.

² The five-digit Health Insurance Oversight System (HIOS)-generated issuer ID number.

Enter the
following
information:

- Name,
- Title,
- Organization,
- Telephone number,
- Email address,
- Signature, and
- Date Signed



Attestation Form B

- Issuers that estimate total allowed EHB must submit this form to attest that they used a reasonable method to estimate, that non-EHB is less than 2% of total, and also that CSR amounts submitted as CSRs provided represent only cost sharing for EHBs that can be included as CSRs provided.

Enter the following information:

- Name,
- Title,
- Organization,
- Telephone number,
- Email address,
- Signature, and
- Date Signed

Attestation Form Submission Scenario # 1

Successful Submission

Scenario 1	Status	Email Message Sent to Issuer POCs
Attestation form(s) has been accepted.	ATTESTATION FORM(S) ACCEPTED AND PROCESSED SUCCESSFULLY	CMS has received your CSR reconciliation Attestation Form(s) and it has been processed successfully. Your form(s) passed CMS's validation checks. Your submission will be marked as complete contingent on your data file being submitted and processed successfully.

Attestation Form Submission Scenario # 2

Rejected Submission

Scenario 2	Status	Email Message Sent to Issuer POCs
Attestation form(s) has been rejected and must be resubmitted	ATTESTATION FORM(S) HAS BEEN REJECTED	CMS rejected your attestation form(s) because it failed the validation process. Your attestation form(s) needs to be corrected and resubmitted. Below is a summary of the errors associated with your attestation form(s). Review the errors to determine what corrections need to be made, and then submit a corrected form(s). CSRATI001 Form A - Mandatory Benefit Year value is missing

Attestation Form Structure Overview



CSR Data Submission Issuer to MIDAS Attestation Inbound Specification File Structure

- **CSR Reconciliation Attestation Forms:**
 - CMS will only accept Attestation Form 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 production.
 - Issuers must use “.P” in the file name for files submitted during the submission window.
 - The attestation filenames must consist of the following sections:
 - Trading Partner (TP) Identifier (ID)
 - Application ID
 - Function Code
 - Date
 - Time
 - Environment
 - Code Direction

CSR Reconciliation Attestation Form Structure

- Issuers will create a ZIP file that includes their attestation form(s) for each HIOS ID and benefit year.
- Issuers will complete an attestation form for **each attestation type per HIOS ID and benefit year.**
- The ZIP file containing the attestations will be named as:
1234567890.MID.CSRATI.D170612.T145543452.P.IN
- The attestation file will be named as:
Attestation<<A/B/>>_benefitYear_HIOSID.
- The Excel forms inside the file will be the name of the forms, such as Attestation A or Attestation B.
- CMS will not accept partial submission of attestation forms.

CSR Data Submission Team

- The CSR data submission team will facilitate the accurate and timely submission of files from Issuers to CMS, and to assist issuers in resolving data validation errors.
- The team can be reached for questions and assistance at CSRreconquestions@cms.hhs.gov

Next Steps



Next Steps

- CSR Data Submission POCs:
Please respond by April 13, 2020 with updated technical and business POCs, if they have changed since the BY 2018 Cost-sharing Reductions Data Submission process occurred. We will assume the technical and business POCs are the same if we do not hear from you.
- CSR Data Submission Window:
April 6, 2020 to May 29, 2020

Questions?

To submit or withdraw questions by phone:

- Dial ***#** (star-pound) on your phone's keypad to ask a question.
- Dial ***#** (star-pound) on your phone's keypad to withdraw your question.

To submit questions by webinar:

- Type your question in the text box under the 'Q&A' tab.

Resources



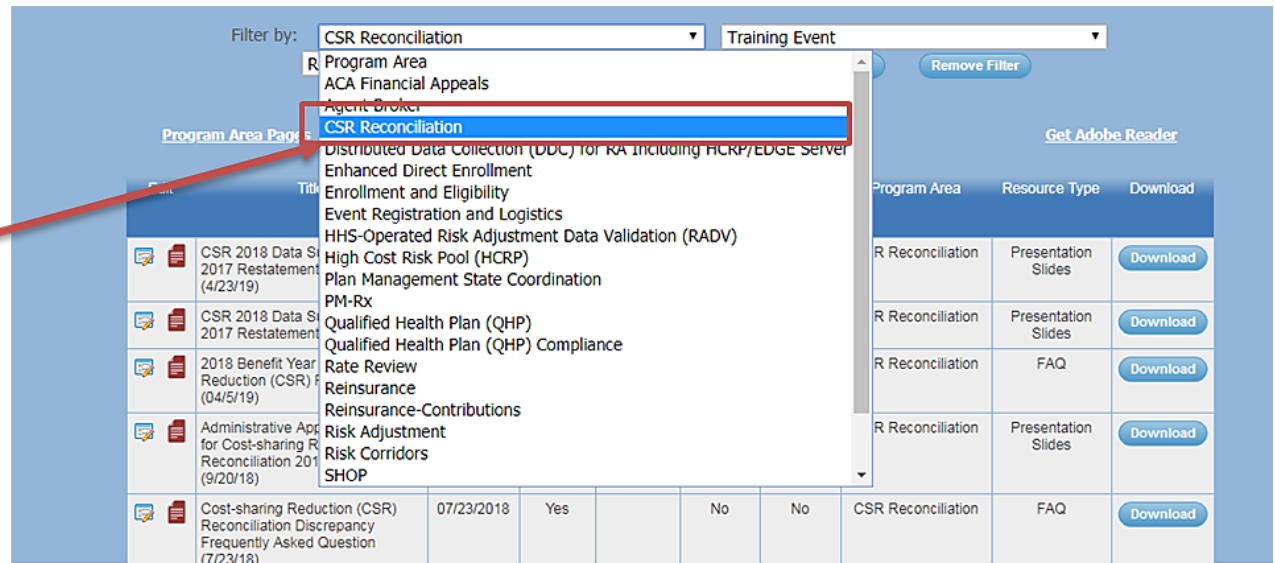
Resources

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

Locating CSR Data Submission Documents in REGTAP

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

Under Program Area, select “Payment-CSR Reconciliation”



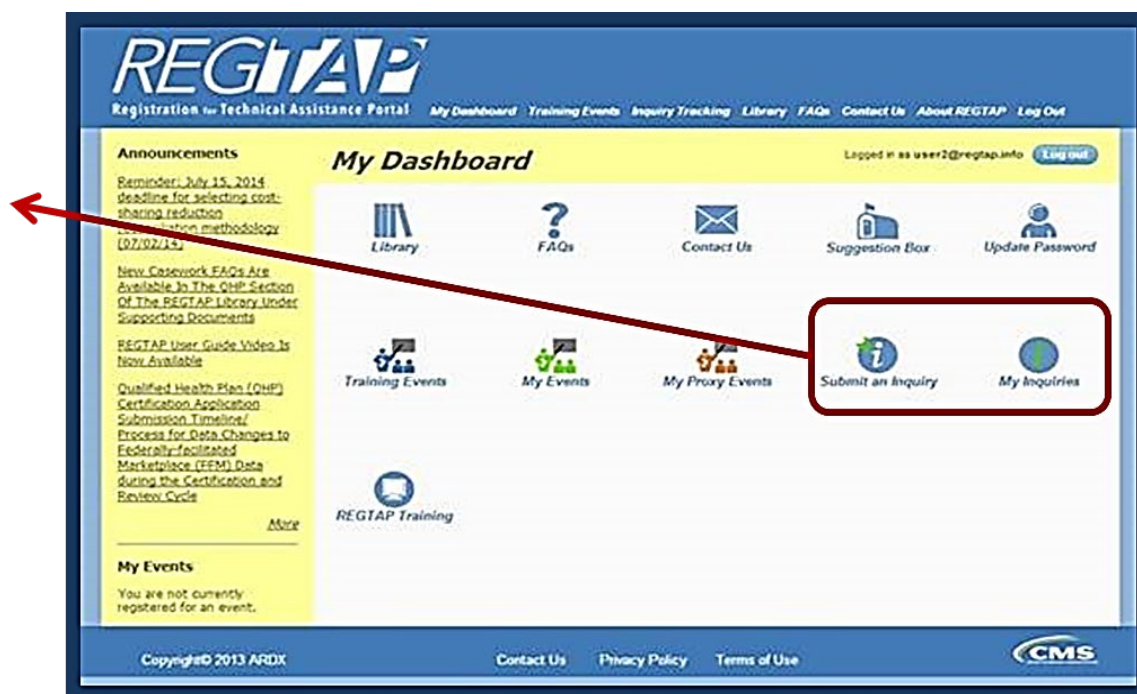
The screenshot shows the REGTAP Library interface. At the top, there are two dropdown menus: 'Filter by:' and 'Training Event'. The 'Filter by:' dropdown is open, showing a list of options. A red box highlights the 'CSR Reconciliation' option, and a red arrow points to it from the text on the left. Below the dropdown, there is a table with columns: 'Program Area', 'Resource Type', and 'Download'. The table contains several rows of data, including 'CSR Reconciliation' and 'Payment-CSR Reconciliation'.

Program Area	Resource Type	Download
R Reconciliation	Presentation Slides	Download
R Reconciliation	Presentation Slides	Download
R Reconciliation	FAQ	Download
R Reconciliation	Presentation Slides	Download
CSR Reconciliation	FAQ	Download

Inquiry Tracking and Management System (ITMS)

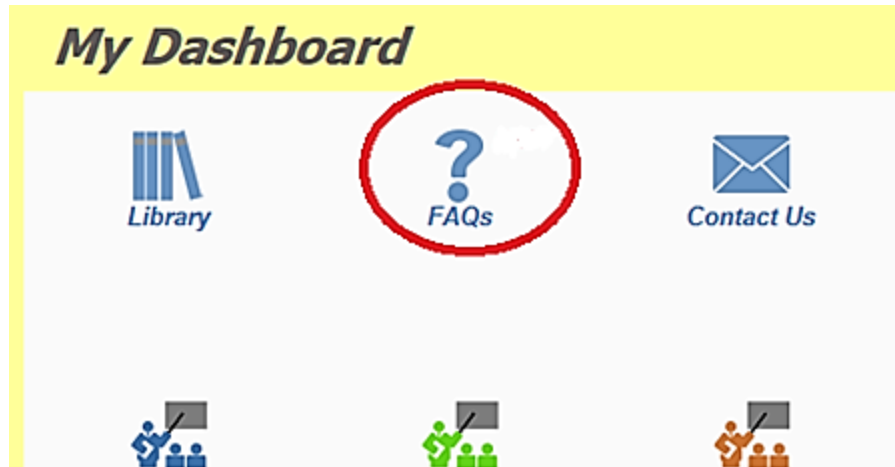
Stakeholders can submit inquiries to <https://www.REGTAP.info> through ITMS.

Select “Submit an Inquiry” or to view submitted inquiries select ‘My Inquiries’ from My Dashboard.



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

FAQ Database on REGTAP



FAQs Database is available at
www.REGTAP.info

The FAQ Database allows users to search FAQs by FAQ ID, Keyword/Phrase, Program Area, Primary and Secondary Categories, Benefit Year, Retired and Current FAQs, and Publish Date.

A screenshot of the 'FAQ Search' form. The form is titled 'FAQ Search' and contains several search criteria fields: 'FAQ ID' with a text input and a note 'Enter single FAQ ID or multiple IDs (1-10 or 15,18,87)'; 'Keyword/Phrase' with a text input; 'Program Area' with a dropdown menu showing options like 'Select All', 'ACA Financial Appeals', 'Agent Broker', 'Distributed Data Collection for RI and RA/Edge Server', and 'Enrollment and Eligibility'; 'Primary Category' with a dropdown; 'Secondary Category' with a dropdown; 'Benefit Year' with a dropdown set to 'Select All'; 'Publish Date' with 'Start Date' and 'End Date' fields, each with a calendar icon; and 'FAQs to Display' with radio buttons for 'Current FAQs Only' (selected), 'Retired FAQs Only', and 'All FAQs (Current and Retired)'. At the bottom, there are 'Search' and 'Clear Search' buttons.

Closing Remarks

