Technical Assistance Call for Reconciliation of the CSR Component of Advance Payments for Benefit Year 2016

April 10, 2017

Health Insurance Exchange Program Training Series

CMS CENTERS FOR MEDICARE & MEDICAID SERVICES

HTTPS://WWW.REGTAP.INFO/

Session Guidelines

- This is a 90-minute technical assistance call.
- For questions regarding content, please send inquiries to CSRreconquestions@cms.hhs.gov.
- For questions regarding logistics and registration, please contact the Registrar at: (800) 257-9520.

Reminder: Policy on Newborns in States that Require 1st Month Free Coverage

As discussed in 1/12/17 CMS guidance, for the purpose of 2016 benefit year CSR reconciliation:

If the newborn is added to the policy by the subscriber and found eligible:

- ❑ Coverage date is the birth date
- ❑ APTC/CSR is provided at the **new** level of eligibility as determined by the FFM.

If the newborn is not added to the policy for the first month, or is never added to the policy:

- ❑ Issuer covers and provides reduced cost sharing to the newborn under the terms of the subscriber's current policy for 31 days, or as required by state law

Error Reports – Record Numbers

Record Numbers

- Error reports include record numbers for error codes CSRIFIL50 (invalid subscriber ID), CSRIFIL64 (invalid value in CSR Provided), and CSRIFIL67 (invalid QHP ID) in the Detailed Description section near the bottom of the report.
- The record number is reflective of the count of the record with the error starting with the first record in the file.
- Error codes CSRIFIL50 (invalid subscriber ID), CSRIFIL64 (invalid value in CSR Provided), and CSRIFIL67 (invalid QHP ID) are the only errors that display in the Detailed Description section and that result in CMS not counting the CSR provided for a record towards an issuer's total valid CSR amount for a HIOS ID and benefit year.
    - The Detailed Description section will include the Exchange-assigned subscriber ID for any records where error codes CSRIFIL50, CSRIFIL64, and CSRIFIL67 are generated.

Error Reports – Record Numbers (continued)

Sample Error Report – Error Code and Detailed Description section near the bottom of the error report

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--------------------------------------------------------------------------------
 ERROR_CODE       ERROR_DESCRIPTION                ERROR_COUNT
--------------------------------------------------------------------------------
CSRIFIL57       03 - Invalid Value in Total Allowed Costs For EHB     2
CSRIFIL59       03 - Invalid Value in Amount the Issuer Paid  1
CSRIFIL61       03 - Invalid Value in Amount the Enrollee(s) Paid     1
CSRIFIL63       03 - Invalid Value in Amount the enrollee(s) would have paid under the
standard plan.  2
CSRIFIL67       03 - Invalid QHPID, plan identifier provided by the issuer for a specific
coverage year.  5
CSRIFIL68       01 - Not Matching the Total CSR Amount in the Issuer Summary (01) with CSR
amounts in the policy detail level (03)       1
--------------------------------------------------------------------------------


--------------------------------------------------------------------------------
ERROR_CODE    RECNO     ERROR_DETAILED_DESCRIPTION
--------------------------------------------------------------------------------
CSRIFIL67       540     43951WA011001902 Invalid QHPID
CSRIFIL67       1187    43951WA011002102 Invalid QHPID
CSRIFIL67       1279    43951WA011001802 Invalid QHPID
CSRIFIL67       1927    43951WA011001102 Invalid QHPID
CSRIFIL67       1928    43951WA011001902 Invalid QHPID
--------------------------------------------------------------------------------
```

Reminder - Attestation Files

- Issuers should complete attestation forms as appropriate, and submit the forms separate from the data files.
- Issuers should upload attestations after confirming successful submission of data files.
- The attestation forms are available on the CCIIO website. Separate forms have been created for each form type and benefit year.
- For restatements, issuers must complete the attestation form(s) that corresponds to the benefit year being restated.
- The forms are in Excel format. **Attestation forms should be zipped by HIOS ID and benefit year.**
    - For example, if you are submitting Attestation Form A for two (2) HIOS IDs for benefit year 2016 reconciliation and restating CSRs for both HIOS IDs for benefit year 2015, you will zip each form separately for a total of 4 zip file submissions.
- Ensure attestation zip files do not include ".zip" on the end of the file name.
    - Attestation file name example: TPID.MID.CSRATI.D170403.T123136760.P.IN

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*

Resources

HTTPS://WWW.REGTAP.INFO/

List of Materials Released by CMS

To assist QHP issuers in the CSR Reconciliation Process, CMS has provided the following resources:

Resource	Resource Link
Cost-Sharing Reduction Reconciliation Guidance for Benefit Year 2016	https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/Final-Manual-for-Reconciliation-of-the-Cost-Sharing-Reduction-Component-of-Advance-Payments-for-the-2016-Benefit-Year.pdf
CSR Reconciliation Issuer to MIDAS Attestation Inbound Specification	https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/2-CSR-Reconciliation-Issuer-to-MIDAS-Attestation-Inbound-Specification-010.pdf
CSR Reconciliation Issuer to MIDAS Inbound Specification	https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/1-CSR-Reconciliation-Issuer-to-MIDAS-Inbound-Specification-01052017.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-01052017.pdf
CSR Reconciliation Attestation File Error Code List	https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/CSR-Reconciliation-Attestation-Error-Code-List-01052017.pdf
Attestation Forms	https://www.cms.gov/CCIIO/Resources/Forms-Reports-and-Other-Resources/index.html#Premium Stabilization Programs
Methodology Web Form	https://acapaymentoperations.secure.force.com/CSRReconciliationMethodology

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List of Materials Released by CMS (continued) - CSR Reconciliation Attestation Forms for Benefit Year 2016 and Prior Year Restatement

Attestation Form	Resource Link
Attestation Form A – 2016 Benefit Year	Cost-Sharing Reduction Reconciliation Attestation Form A - Benefit Year 2016
Attestation Form A – 2015 Benefit Year	Cost-Sharing Reduction Reconciliation Attestation Form A - Benefit Year 2015
Attestation Form A – 2014 Benefit Year	Cost-Sharing Reduction Reconciliation Attestation Form A - Benefit Year 2014
Attestation Form B – 2016 Benefit Year	Cost-Sharing Reduction Reconciliation Attestation Form B - Benefit Year 2016
Attestation Form B – 2015 Benefit Year	Cost-Sharing Reduction Reconciliation Attestation Form B - Benefit Year 2015
Attestation Form B – 2014 Benefit Year	Cost-Sharing Reduction Reconciliation Attestation Form B - Benefit Year 2014
Attestation Form C – 2016 Benefit Year	Cost-Sharing Reduction Reconciliation Attestation Form C and Parameters – Benefit Year 2016
Attestation Form C – 2015 Benefit Year	Cost-Sharing Reduction Reconciliation Attestation Form C and Parameters – Benefit Year 2015
Attestation Form C – 2014 Benefit Year	Cost-Sharing Reduction Reconciliation Attestation Form C and Parameters – Benefit Year 2014

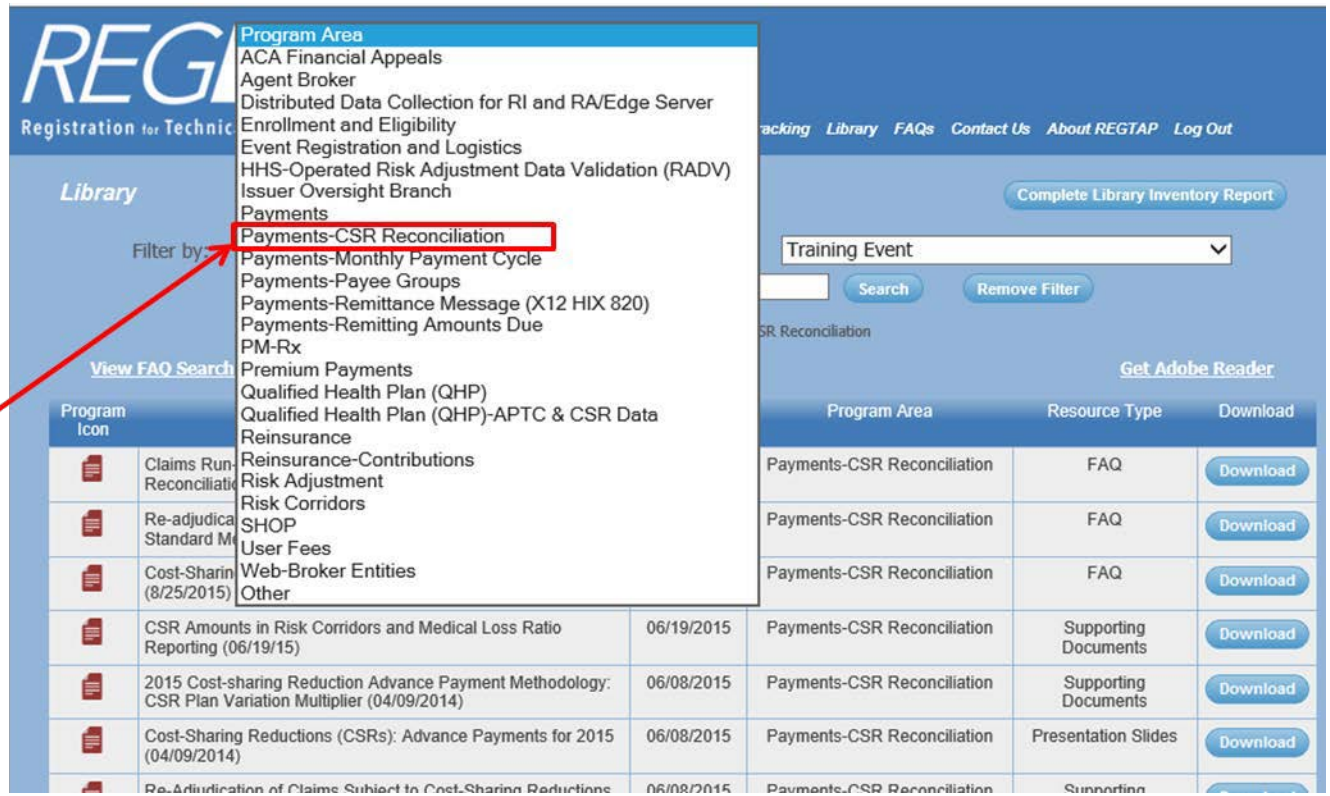
Resources

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

Locating CSR Reconciliation Documents in REGTAP

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

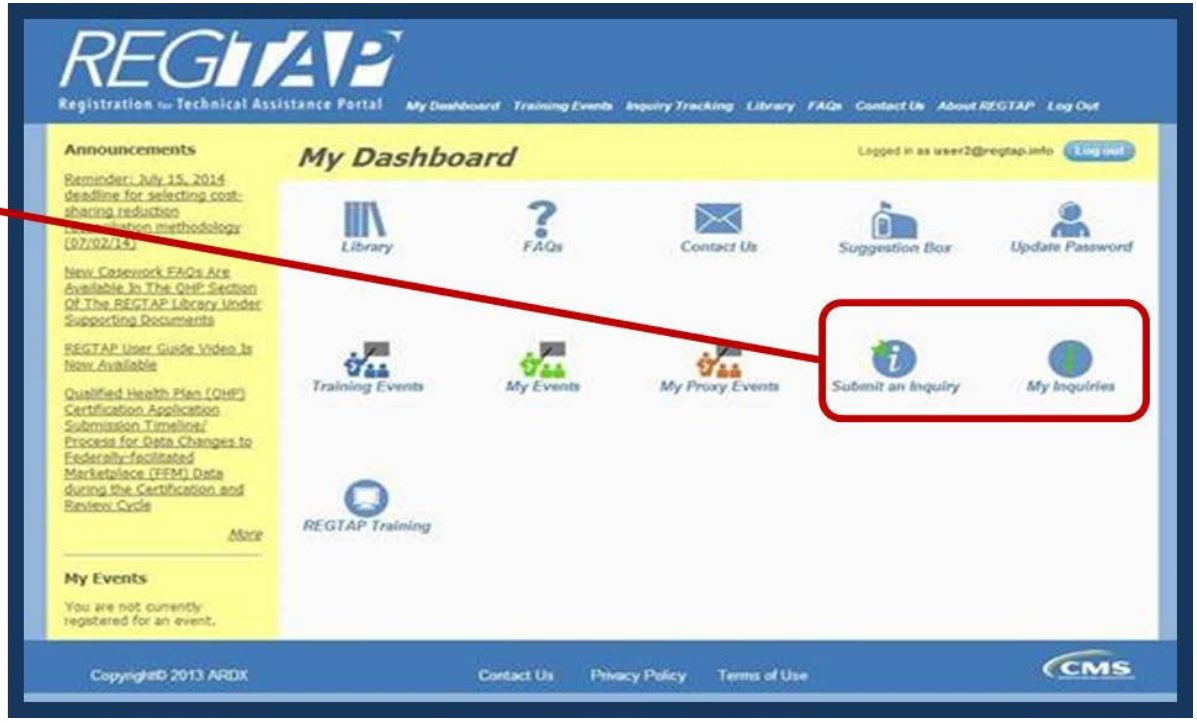
Under Program Area, select "Payment-CSR Reconciliation"



Inquiry Tracking and Management System (ITMS)

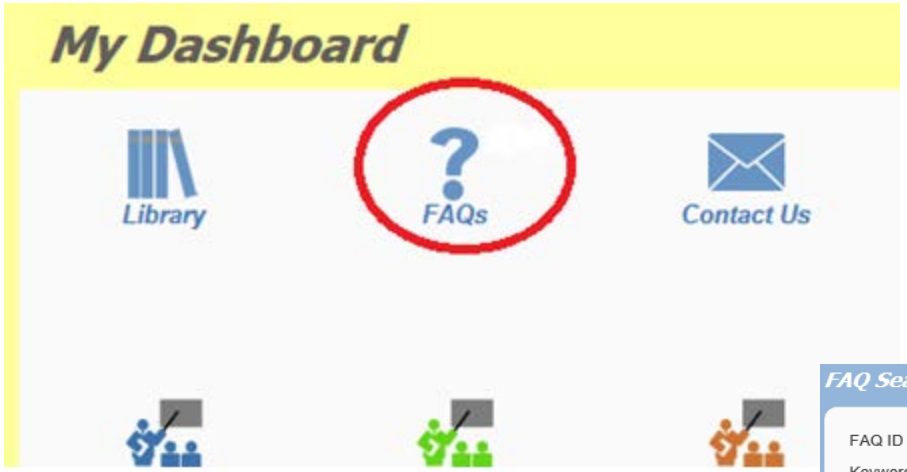
Stakeholders can submit inquiries to https://www.REGTAP.info through ITMS.

Select 'Submit an Inquiry' from My Dashboard.

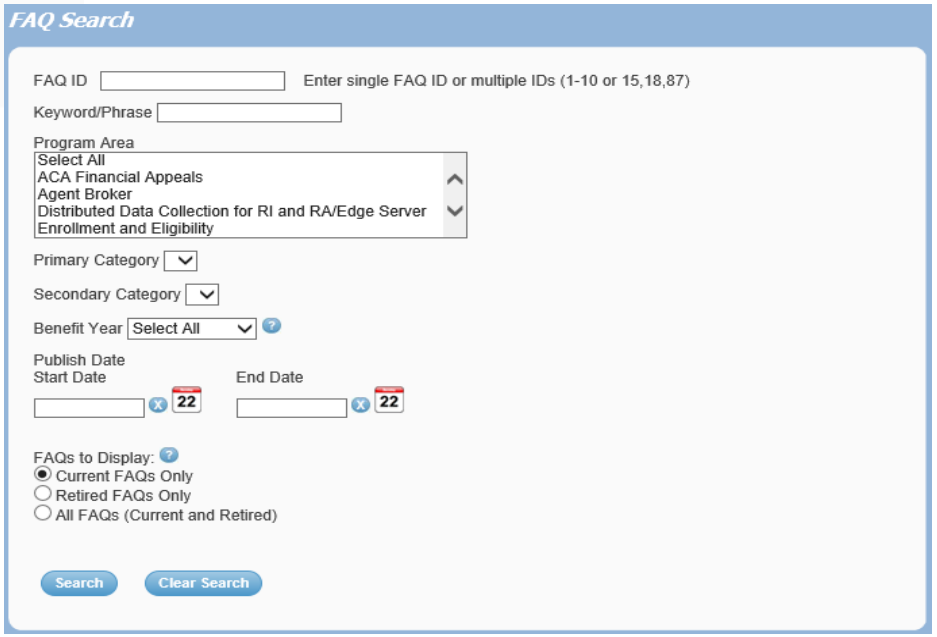


Note: Enter only one (1) question per submission.

FAQ Database on REGTAP



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



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

Closing Remarks

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