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

May 1, 2017

Health Insurance Exchange Program Training Series

CMS
CENTERS FOR MEDICARE & MEDICAID SERVICES

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Session Guidelines

- This is a 60-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.

Deadline

REMINDER THE DEADLINE TO COMPLETE THE 2016 BENEFIT YEAR CSR RECONCILIATION PROCESS IS
JUNE 2, 2017 AT 11:59 PM ET

Reminder - Data Files

- Do not include blank lines in between records in your data file submission.
    - Blank lines in between records will cause you to receive a file rejection, and your error report will indicate that there are records in the file that do not start with 01, 02, or 03.

- Every data and attestation file name must be unique. Update the date and time stamp in the file name if you are resubmitting the file. **MIDAS will not process files if they are the same name as a previous submission**.

- **Submit files with a ".P" in the file name.**
    - Data file name example:TPID.MID.CSRI.D170403.T123136760.P.IN
    - Attestation file name example: TPID.MID.CSRATI.D170403.T123136760.P.IN

Reminder - Restatements

- Issuers restating CSRs for a prior benefit year should submit complete data files in the same manner and using the 2016 benefit year format.

- **Data files for restatements must be submitted separately by HIOS ID and benefit year. Data files for restatements must be a full file. The specifications are available at: https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/1-CSR-Reconciliation-Issuer-to-MIDAS-Inbound-Specification-01052017.pdf**

- **Restatements must be in the new data file format for the 2016 benefit year, as outlined in this presentation. MIDAS will not process files in the old file format.**

Reminder – Restatements (Continued)

- Restatements can apply to previous year data as well as new policies (policies that were in effect, but not formerly reported to CMS for reconciliation of the benefit year).

- Issuers must use the methodology selected for the benefit year being restated to re-calculate actual CSRs provided for that benefit year.

- Issuers must submit the attestation form that corresponds with the benefit year being restated.

Reminder - Restatements (continued)

- Issuers will receive an updated June 30th report for CSR reconciliation for the restated HIOS ID and benefit year.

- For complete information on restatements, please see page 29 of the Manual for Reconciliation of the Cost-Sharing Reduction Component of Advance Payments for benefit year 2016, available at:
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

Reminder - Restatements (continued)

- CMS is permitting Issuers to restate 2014 benefit year CSR reconciliation data only for data omitted because of outstanding appeals or unusual circumstances, as determined by CMS. **This is the only opportunity to restate benefit year 2014.**

- **Issuers must receive approval from CMS for 2014 benefit year restatements in advance of submitting the file to MIDAS.**

    - Email CSRreconquestions@cms.hhs.gov if you have a request to restate the 2014 benefit year. Include your HIOS ID and an explanation about why you need to restate the 2014 Benefit Year.

Reminder - Attestation Files

- Issuers should complete attestation forms as appropriate, and submit the forms separate from the data files.

- Issuers should **ONLY** upload attestations **AFTER** confirming successful submission of data files.

- The attestation forms are available on the CCIIO website and on slide 10 in this presentation. 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.

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

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Reminder - Attestation Files (continued)

- 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 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 <u>total of four zip file submissions.</u>

  - Ensure attestation zip files do <u>not</u> include ".zip" on the end of the file name.

    - Attestation file name example: TPID.MID.CSRATI.D170403.T123136760.P.IN

Reminder - 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 Reconciliation amounts for the benefit year.

Reminder – Deadline for Reconciliation of the 2016 Benefit Year

- The submission deadline for data and attestation files for benefit year 2016 and prior year restatements is **June 2, 2017 at 11:59 pm ET**.

- CMS will consider your most recent data file submission with a status of Accepted or Accepted with Errors, and your most recent attestation file submission with a status of Accepted, to be your final submission as of the June 2, 2017 deadline.

- If your organization has not submitted your files for 2016 as of the June 2, 2017 deadline, **<u>CMS has the authority to recoup advanced CSRs provided to your organization for the 2016 benefit year.</u>**

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

List of Materials Released by CMS (cont.) - 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

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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"

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Inquiry Tracking and Management System (ITMS)

Stakeholders can submit inquiries to https://www.REGTAP.info through ITMS.
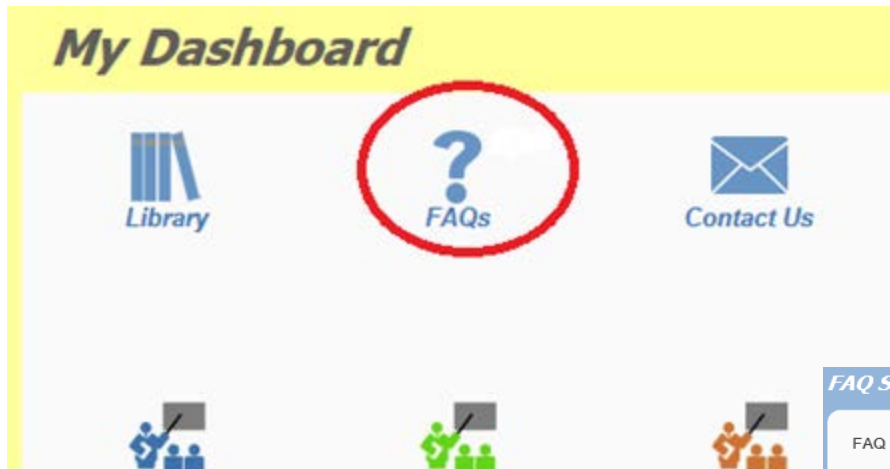
Select 'Submit an Inquiry' from My Dashboard.
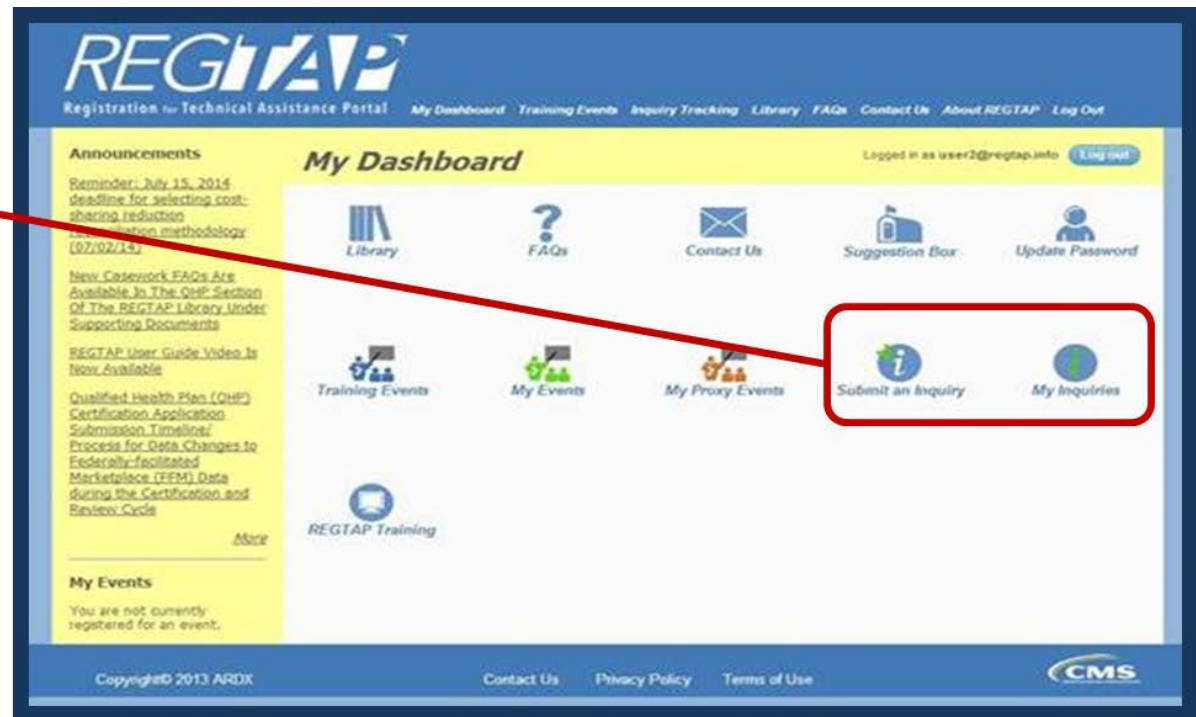
Note: Enter only one (1) question per submission.

FAQ Database on REGTAP

My Dashboard

Library — FAQs — Contact Us

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 Search

FAQ ID [_____] Enter single FAQ ID or multiple IDs (1-10 or 15,18,87)

Keyword/Phrase [_____]

Program Area
Select All
ACA Financial Appeals
Agent Broker
Distributed Data Collection for RI and RA/Edge Server
Enrollment and Eligibility

Primary Category [∨]

Secondary Category [∨]

Benefit Year [Select All ∨] ?

Publish Date
Start Date   End Date
[_____] ⊗ 22   [_____] ⊗ 22

FAQs to Display: ?
⦿ Current FAQs Only
◯ Retired FAQs Only
◯ All FAQs (Current and Retired)

[Search] [Clear Search]

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

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Closing Remarks

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