Best Practices & Lessons Learned for the Reconciliation of the CSR Component of Advance Payments for Benefit Year 2016

March 22 & 27, 2017

Health Insurance Exchange Program Training Series

CMS CENTERS FOR MEDICARE & MEDICAID SERVICES

HTTPS://WWW.REGTAP.INFO

Agenda

- Session Guidelines
- Intended Audience and Purpose
- Timelines
- Lessons Learned from Testing and Reminders
- Methodology web form
- Question and Answer (Q&A)
- Resources

Session Guidelines

- This is a 90-minute webinar session.
- 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.

Intended Audience

- The intended audience includes issuers that received the Cost-Sharing Reduction (CSR) portion of advance payments for the 2016 benefit year and issuers restating CSRs for the 2015 benefit year.
- The purpose of this presentation is to educate and prepare all issuers participating in the CSR reconciliation process for the 2016 benefit year and issuers restating CSRs for the 2015 benefit year.

Purpose

- This stakeholder training session will:
  - Review timelines associated with CSR reconciliation of the 2016 benefit year
  - Discuss lessons learned from testing and reminders about the submission process
  - Provide an overview and timelines related to the Methodology Web Form
  - Review next steps
  - Questions and Answers

Timelines

Timing of Reconciliation Process Calendar

Timing	Activity
November 2016	Draft Instructional manual and specification guide published on CMS website for 30-day comment period.
January 2017	Final manual and specifications published.
February 2017	Webinars and training for all issuers.
March 1-10, 2017	Testing window for benefit year 2016 reconciliation and 2015 restatements.
April 3, 2017	Data submission window opens for benefit year 2016 reconciliation and 2015 restatements. The Methodology web form opens again from April 3, 2017 to 11:59 p.m. E.T. on May 30, 2017.
June 2, 2017	Data submission window closes for benefit year 2016 reconciliation and 2015 restatements.
June 30, 2017	CMS notifies issuers of reconciled amounts.

Lessons Learned from Testing and Reminders

Lessons Learned

- Some issuers received the following errors in their error reports for data files submitted during testing:
  - **CSRIFIL71**: 03 - Exchange-assigned Policy Start Date does not meet format requirements
  - **CSRIFIL72**: 03 - Exchange-assigned Policy End Date does not meet format requirements
- When the submission window opens on April 3, 2017, issuers will no longer receive these errors if the issuer does not populate Policy Start and End Dates (optional fields) in their data file submissions.

Lessons Learned

- Some issuers received valid CSR and CSR Reconciliation amounts in their error reports with more than two (2) decimal places and/or in scientific notation. Additionally, some issuers received an incorrect CSR reconciliation calculation in their error reports.
- The above issues will be fixed by the time the submission window opens on April 3, 2017. Valid CSR and CSR Reconciliation amounts in error reports will be rounded to two (2) decimal places.

Lessons Learned

- Some issuers received incorrect error code counts in the error reports they received for data files submitted during testing.
- A few issuers received a data file rejection, but their corresponding error report did not list any errors.
- The above issues will be fixed by the time the submission window opens on April 3, 2017.

Lessons Learned

- 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.

Lessons Learned

- Error reports generated as the result of test data file submissions followed this file name convention:
- TPID.CSRO.DYYMMDD.T123456789**.I.**OUT
- Error reports generated as the result of production data files submitted during the upcoming submission window will follow this file name convention:
  TPID.CSRO.DYYMMDD.T123456789**.P.**OUT
- Issuers receive ".I" reports in one outbound EFT folder, while ".P" reports will be sent to a different folder in the issuer's EFT.
- Issuers can expect to receive error reports in their outbound EFT folder within approximately 24 hours of submitting a data file.
- If issuers cannot locate their error reports, check to see if internal scripts may be routing the reports to an alternate location (related to the HIX 820 process). If you are still unable to locate error reports, email CSRreconquestions@cms.hhs.gov.

Reminder – Contacting CMS with file status questions

- If your organization submits a CSR reconciliation data file and/or attestation file and does not receive a confirmation email and/or error report within 24 hours of submitting the file, follow these steps:

- Double check the name of the file your organization submitted to ensure it follows the correct file name convention:
  - Data file name example: TPID.MID.CSRI.D170403.T123136760.P.IN
  - Attestation file name example: TPID.MID.CSRATI.D170403.T123136760.P.IN
- If your file does not follow the file name convention, correct the file name and resubmit the file.
- If your file follows the correct file name convention and you cannot locate your error report(s), check to see if internal scripts may be routing the reports to an alternate location or folder (related to the HIX 820 process).
- If you still are unable to locate your error report(s) and/or have not received a confirmation email(s), please email CSRreconquestions@cms.hhs.gov with your HIOS ID(s), file name(s) and date you submitted the file(s).

Reminders

- If you email CSRreconquestions@cms.hhs.gov with questions about a file submission, please include the file name(s) and submission date so we can investigate the file(s).
- 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 have the same name as a previous submission.
- During the submission window, 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

Reminders (continued)

- There are separate versions of each attestation form by form type and benefit year. Slide 33 includes links to the forms.
  - Update: The attestation forms for restatements of benefit years 2014 and 2015 are being updated to reflect the correct submission due date (June 2, 2017).
- 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

Reminders (continued)

- Issuers will receive confirmation emails from MIDAS with the status of their data file and attestation file submissions.
- Confirmation emails for data files are sent to the business and technical 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 from the Methodology web form the issuer submitted, or the POC on file from reconciliation of the 2014 and 2015 benefit years if the issuer did not submit the web form.
  - Note: There is a delay between when issuers report updated POCs via the Methodology web form and when the update is made in MIDAS (where attestation form submissions are processed).

Reminders (continued)

- All data file submissions, including restatements of the 2015 benefit year, must be in the new file format.

Restatements

Reminder - Restatements

- Issuers restating CSRs for a prior 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.**
  - **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.**
- 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 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.
- **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 - Data Accuracy at the Issuer, Plan and Policy Levels

- CMS will sum the CSR Provided amounts in valid (03) Policy Detail level records, and compare this sum to the amount the issuer received for the CSR component of advance payments for the benefit year.
- This comparison will serve as the basis for the CSR reconciliation calculation.
- The expected CSR reconciliation amount will be displayed in the error report CMS sends to the issuer.
- **Valid CSR and CSR Reconciliation amounts in error reports are preliminary. CMS will send issuers final valid CSR and CSR Reconciliation amounts in the report for reconciliation of the benefit year on June 30, 2017.**

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.

Sample Error Log (page 1)

SAMPLE ERROR LOG FOR BENEFIT YEAR 2016 DATA FILE SUBMISSION

----------File Statistics----------

PROCESSING FILE : CSRI.330519730.D161026.T103735000.P

FILE FORMAT : /data/midas_pentaho/csrr/working/CSRI.330519730.D161026.T103735000.P: ASCII text

VALIDATING FILE BASICS.....

Number of 01 Records in the file : 1

Number of 02 Records in the file : 10

Number of 03 Records in the file : 5506

Number of Records that do not start with 01 or 02 or 03 in the file : 0

Number of 01 Records that do not have 27 fields : 0

Number of 02 Records that do not have 9 fields : 0

Number of 03 Records that do not have 14 fields : 0

VALIDATING ISSUER SUMMARY (01 Records)

HIOS ID : 89944

TPID : 9413405245

Coverage Year : 2016

Selected Methodology : SIMPLIFIED AV

Total Amount of CSR Provided in Issuer Summary Record : 3715568.50

VALIDATING POLICY DETAIL (03 Records)

QHPIDs submitted in 03 Records :

89944GA005000404 89944GA005000405 89944GA005000406 89944GA005000502 89944GA005000504 89944GA005000505

89944GA005000506 89944GA005000602 89944GA005000604 89944GA005000605 89944GA005000606 89944GA005000902

QHPs that received advanced CSR payments, but were not submitted in this reconciliation file:

89944GA005555802
89944GA005555902

SAMPLE

Sample Error Log (page 2)

Policy level (03) with invalid CSR format : 0

Number of 03 Records missing Annual Limitation on Cost Sharing for Standard Plan (SIMPLIFIED AV) : 0

Number of Invalid 03 Records (Invalid due to error code CSRIFIL50 and/or CSRIFIL67) : 1

Sum of all CSR Provided from Policy Detail Records: 3,715,568.50

Valid CSR Amount from Policy Detail Records : 3,714,568.50

Invalid CSR Amount from Policy Detail Records (Invalid due to error code CSRIFIL50, CSRIFIL64, and/or CSRIFIL67) : 1,000.00

Advanced CSR amount for benefit year: 2,493,177.09

Reconciled CSR payment or charge for the benefit year: 1,221,391.41

ERROR_CODE	ERROR_DESCRIPTION	ERROR_COUNT	
CSRIFIL50	03 - Invalid Exchange Assigned Subscriber ID Lookup (FEPS)	1	2017-04-24

ERROR_CODE	ERROR_DETAILED_DESCRIPTION	
CSRIFIL50	89944GA005000506; 0000012345; Invalid against the FEPS enrollment data (FFM plans only) Exchange Assigned Subscriber Id	2017-04-24

SAMPLE

Methodology Web Form Overview

Methodology Web Form

- CMS created a new web form to allow issuers to report methodology for reconciliation of the CSR portion of advance payments for a HIOS ID and benefit year, along with technical points of contact (POC) for the corresponding HIOS ID(s) for which you reported the CSR Reconciliation methodology.
- If issuers used the simplified methodology in 2015 or the issuer was not an applicable 2014 or 2015 issuer and therefore did not select a methodology, all three (3) methodology options are available to you for CSR Reconciliation for the 2016 benefit year.
- If issuers used the standard methodology in the 2015 benefit year, standard is the only methodology option available to you for CSR Reconciliation for the 2016 benefit year.*
    - o These issuers may still complete the web form to notify CMS of new or updated technical POCs.

*with the exception of issuers that experienced a merger or acquisition for the benefit year being reconciled or restated

Methodology Web Form

- The web form will be open from **Monday, April 3, 2017 to 11:59 p.m. on Tuesday, May 30, 2017**.
- We strongly encourage issuers, especially issuers that are new to reconciliation of the 2016 benefit year, to submit any methodology and POC updates using the web form **as soon as possible**, if they have not already, to avoid any potential data file and attestation file processing issues.
  - If you submit your data file with an updated methodology during the submission window, but have not submitted the methodology update via the web form, your data file may be rejected.
  - As noted previously, there is a lag between when an issuer provides updated information via the web form and when the update is made in MIDAS.

Methodology Web Form

- This web form must be completed and submitted in a single session; it is not possible to save and return to the session.
- You may submit the form multiple times to provide updated methodology or POC information to CMS. You will have to re-enter your information each time you submit the form.
- Although CMS will make the web form available again during the 2017 reporting cycle open submission window, which begins April 3, 2017, CMS will not permit methodology or POC changes after May 30, 2017. Email CSRreconquestions@cms.hhs.gov if you have questions regarding the web form.
- **Link to Web Form**: https://acapaymentoperations.secure.force.com/CSRReconciliationMethodology
- **Link to Web Form User Guide:** https://www.regtap.info/uploads/library/FT_CSR_WebFormGuide_5CR_020617.pdf

Next Steps

- Methodology web form: Open from **April 3, 2017** to **May 30, 2017.**
- Submission window: **April 3, 2017** to **June 2, 2017.**
- We anticipate hosting technical assistance calls with all issuers in April and May. Schedule:
  - **Mondays and Wednesdays from 2:00 – 3:30 p.m. ET**
- Issuers can email CSRreconquestions@cms.hhs.gov with questions.

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 (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 2014
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

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

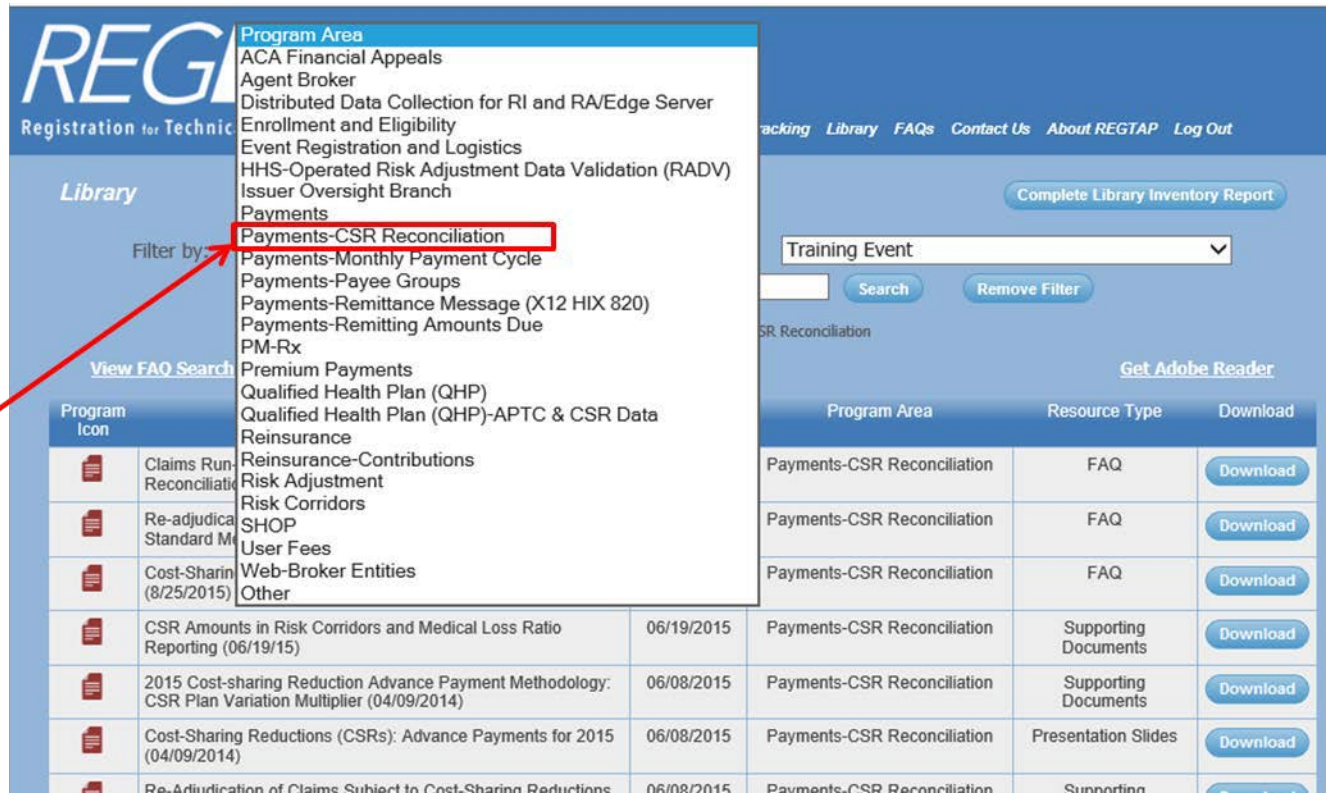
Resources

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.

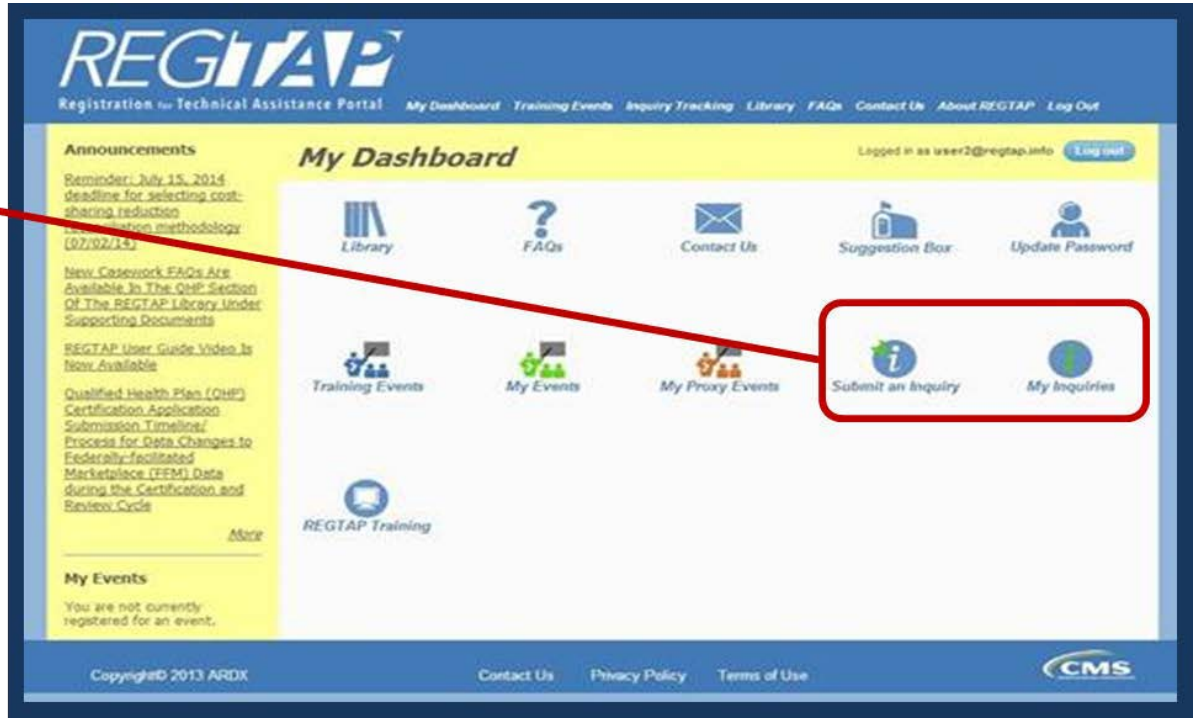
Under Program Area, select "Payment-CSR Reconciliation"



Inquiry Tracking and Management System (ITMS)

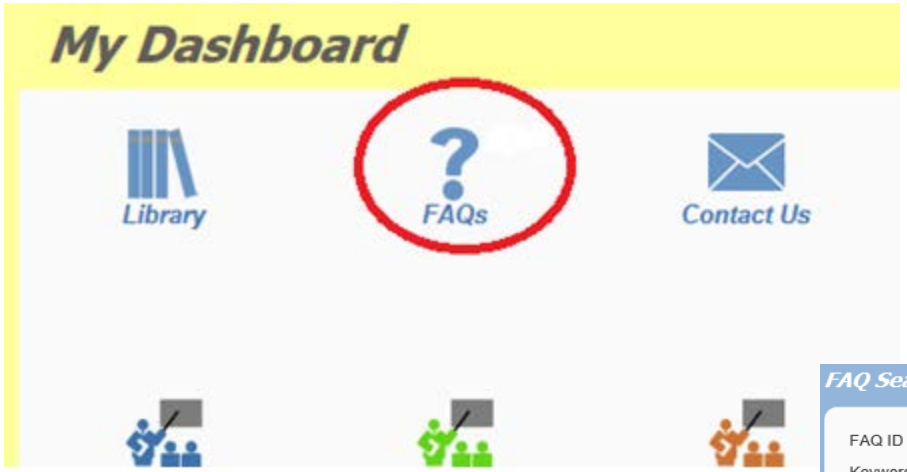
Stakeholders can submit inquiries to https://www.REGTAP.info through ITMS.

Select 'Submit an Inquiry' from My Dashboard.

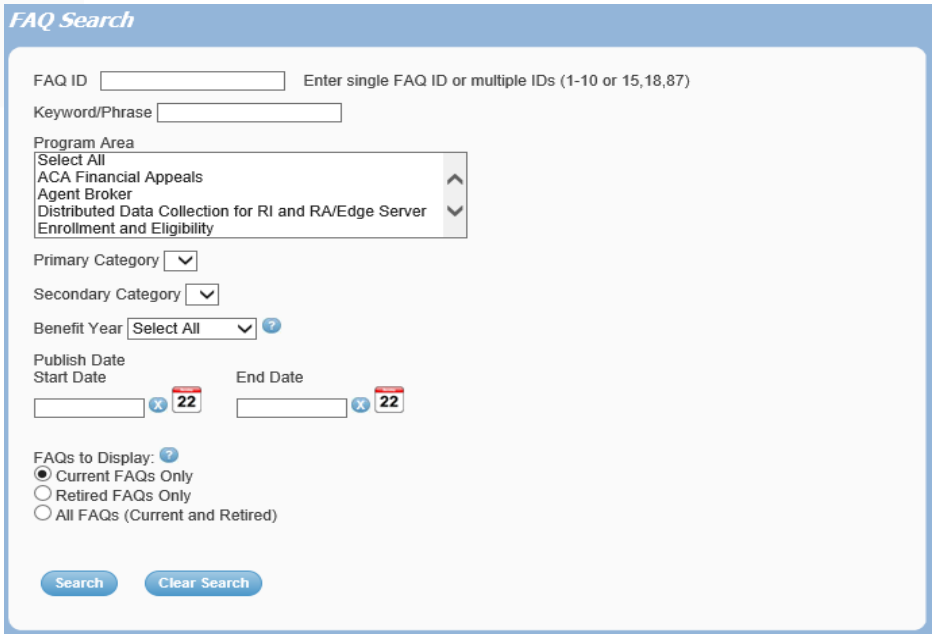


Note: Enter only one (1) question per submission.

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