Cost-sharing Reduction (CSR) Data Submission for Benefit Year 2018 and Benefit Year 2017 Restatements

May 16, 2019

Health Insurance Exchange Program Training

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Agenda

- Session Guidelines
- Announcements
- Timeline
- (03) Policy Detail Record
- Discrepancy Resolution Process Guidance
- Questions
- Resources
- Closing Remarks

Session Guidelines

- This is a 30-minute webinar session
- For questions regarding content, submit inquiries to CSRreconquestions@cms.hhs.gov
- For questions regarding logistics and registration, contact the Registrar at: (800) 257-9520

Intended Audience

- The intended audience includes Issuers that will be submitting data regarding CSR payments for benefit year (BY) 2018 and/or Issuers restating CSR payment data for BY 2017.

Purpose

- This stakeholder training session will:
  - Provide announcements related to the CSR data submission process.
  - Provide an overview of the discrepancy resolution process.
  - Answer Issuer questions regarding the requirements Issuers must follow to submit CSR data and attestation files, including the process and file format requirements.

Announcements

- Report Letters for Certain Litigants
  - On Tuesday, May 14th we sent out a letter to those who met the initial May 3rd deadline requesting those issuers to confirm if they intended the data file submission referenced in the letter to be final.
  - By Friday, May 17th, please email us at CSRreconquestions@cms.hhs.gov to respond to this request.
- Reminder on intent to submit
  - We request Issuers that do not intend to submit CSR data to email us and notify us as soon as possible.
- Reminder on point of contact (POC) update

Data Submission Calendar For All Other Issuers & Discrepancy Window for Litigant Issuers

Timing	Activity
May 6, 2019	Submission window opens, for all other Issuers, for BY 2018 data submission and BY 2017 restatements.
May 21, 2019	Discrepancy window opens for litigant Issuers whose final BY 2018 data submission and BY 2017 restatements were submitted by May 3, 2019.
May 31, 2019	Submission window closes, for all other Issuers, as well as Issuers with extensions of the certain litigant data submission deadline, for BY 2018 data submission and BY 2017 restatements.
June 2019	CMS notifies all other Issuers of CSR amounts.
June 20, 2019	Discrepancy window closes for litigant Issuers whose final BY 2018 data submission and BY 2017 restatements were submitted by May 3, 2019.

(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|20170701|20171231|11512NC006002403|20160701|20161231|0.00|<*blank*>|0|0|10.00|6.00|4.00|6.00|2.00

(03) Policy Detail Record

Even though 3 fields are no longer relevant, issuers must keep all 17 fields on the policy detail record.

- For the 3 fields that are no longer relevant, issuers may leave blank or enter a numerical value of zero.
- The 3 fields that are no longer relevant are Self Only/Other than self-only (position 310), Annual limitation on cost sharing for the standard plan (position 311), and Actuarial value amount of the standard plan (position 312).
- For more information, please refer to the CSR Reconciliation BY 2018 03 Policy Detail Record FAQs (05/03/19): https://www.regtap.info/reg_librarye.php?i=2872

Discrepancy Resolution Process Guidance

- Certain litigant Issuers who confirm by Friday, May 17th that the data and attestation files provided in their May 14th letters represent their final 2018 benefit year data, and, if applicable, their 2017 benefit year restatement submissions, may file a discrepancy.
- **The discrepancy period for Issuers described above is from Tuesday, May 21st until 11:59 p.m. EDT on Thursday, June 20th.**

Discrepancy Resolution Process Guidance

- Discrepancy Resolution Process Guidance
  - Issuers seeking to file a discrepancy should use the "CSR Discrepancy Inbound Specification" for the 2017 BY and 2016 Prior Year Restatement document. Issuers must follow the process outlined in this document to report a CSR discrepancy.
  - The only change from last year's guidance is the benefit year.

- The technical specifications are available on the CCIIO website: https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/CSR-Recon-Discrepancy-Reporting-BY2017.pdf

- You can also reference last year's "CSR Reconciliation Discrepancy Process Overview for BY 2017 and BY 2018 Restatements" Webinar, which is available on REGTAP: https://www.regtap.info/reg_librarye.php?i=2590

Discrepancy Resolution Process Guidance

- CMS will only accept discrepancies for data that directly impacts the calculation of the Issuer's reconciled CSR amounts.
- Issuers should not file a discrepancy for an issue for which the issuer previously filed a discrepancy (applies to 2017 restatements).
- Any Issuer that is considering filing an appeal should also file a discrepancy in order to permit CMS to work with the Issuer to resolve the dispute outside the formal administrative appeals process.

Discrepancy Resolution Process Guidance

- If you have questions regarding data in your organization's May 14, 2019 letter, please contact CSRreconquestions@cms.hhs.gov.

- CMS can provide additional details about the calculations in your letter, which may address any issue for which you may submit a discrepancy.

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

CMS
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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/cciio
Consumer website on Health Reform	http://www.healthcare.gov/
Registration for Technical Assistance Portal (REGTAP) - presentations, FAQs	https://www.REGTAP.info

List of Materials Released by CMS

- To assist QHP Issuers in the CSR Reconciliation Process, CMS has updated the following resources:

Resource	Resource Link
CSR Reconciliation Issuer to Multidimensional Insurance Data Analytics System (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 (please refer to the 2017 document)	https://www.cms.gov/CCIIO/Resources/Forms-Reports-and-Other-Resources/Downloads/Final-CSR-Reconciliation-Issuer-to-MIDAS-Inbound-Specification-BY2017.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 - CSR Reconciliation Attestation Forms for BY 2018 and BY 2017 Restatements

Attestation Form	Resource Link
Attestation Form A – Benefit Year 2018	https://www.cms.gov/CCIIO/Resources/Forms-Reports-and-Other-Resources/index.html
Attestation Form B – Benefit Year 2018	

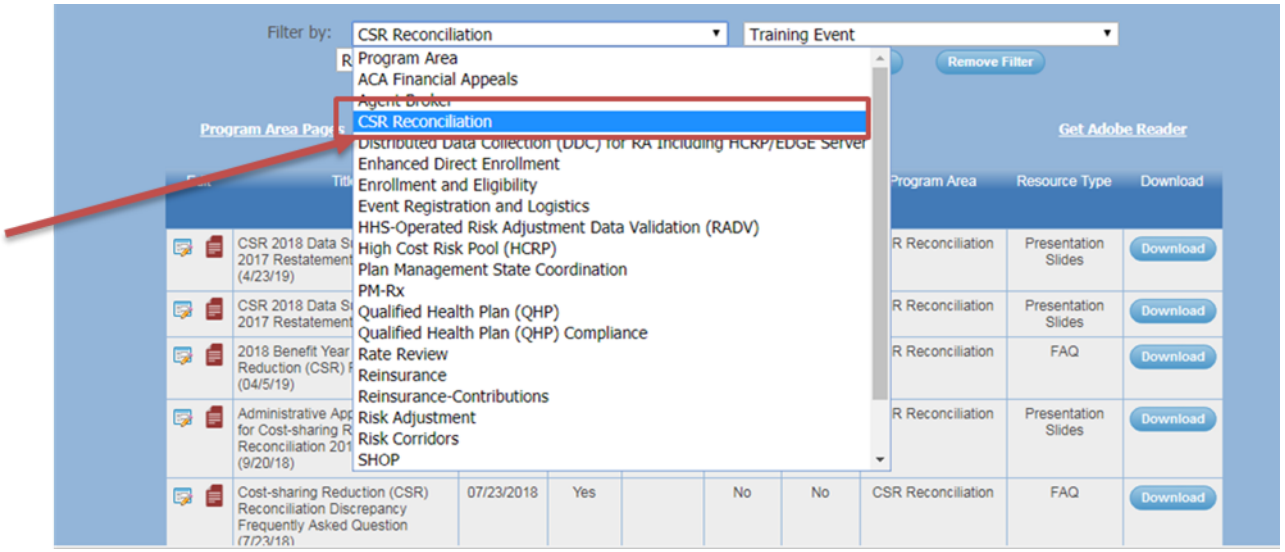
UPDATES:

- Updated Attestation Forms A and B at the link above can be used for BY 2018 and/or BY 2017 restatements.

Locating CSR Reconciliation Documents in REGTAP

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

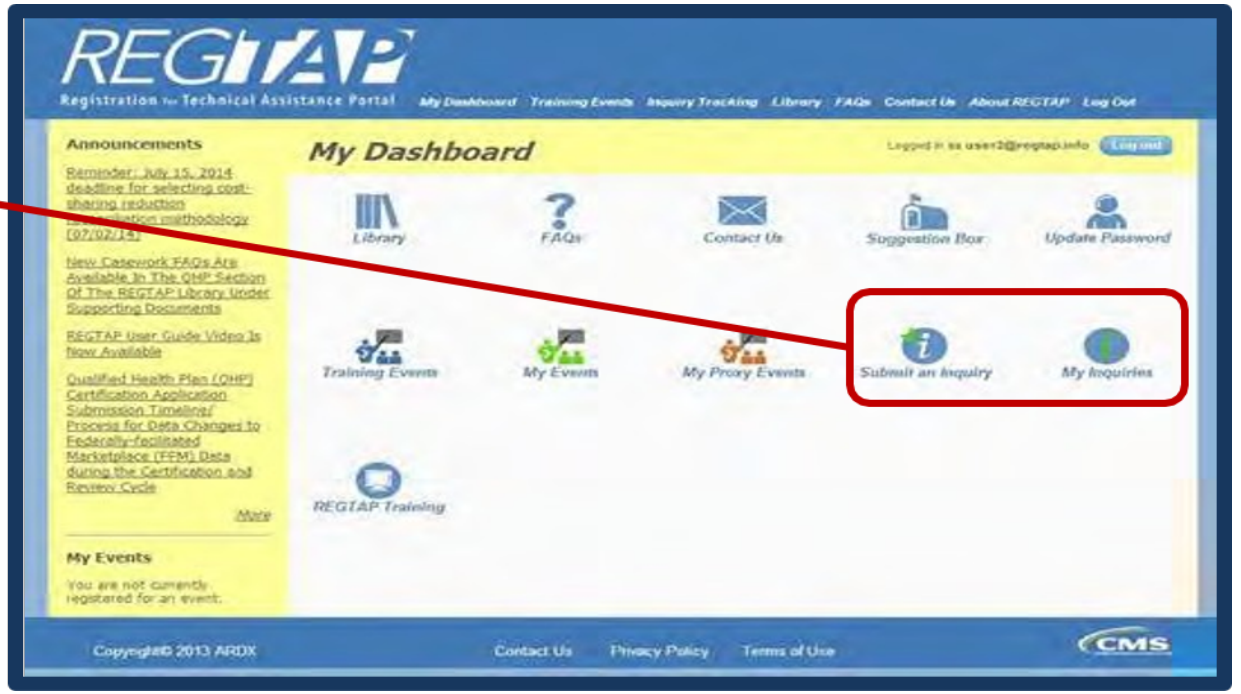
Under Program Area, select “CSR Reconciliation”



Inquiry Tracking and Management System (ITMS)

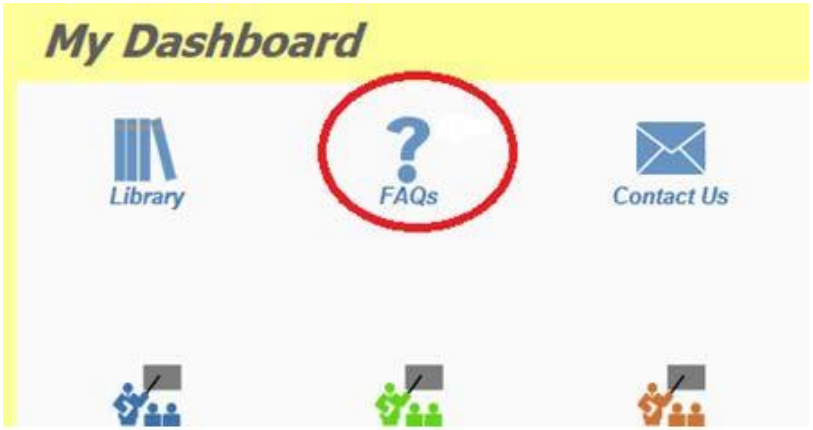
Stakeholders can submit inquiries to ITMS at https://www.regtap.info/.

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



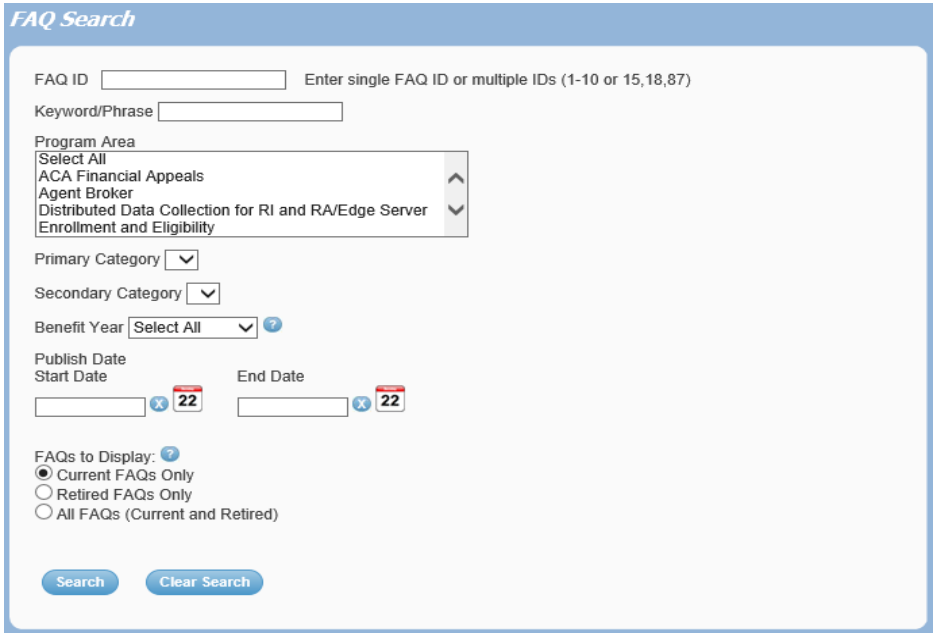
Note: Enter only one (1) question per submission.

FAQ Database on REGTAP



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