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

June 13, 2019

Health Insurance Exchange Program Training Series

This communication was printed, published, or produced and disseminated at U.S. taxpayer expense. The information provided in this presentation is only intended to be a general informal summary of technical legal standards. It is not intended to take the place of the regulations that it is based on. We encourage audience members to refer to the applicable regulations for complete and current information about the requirements that apply to them.

HTTPS://WWW.REGTAP.INFO/

CMS
CENTERS FOR MEDICARE & MEDICAID SERVICES

Agenda

- Session Guidelines
- Guidance for the Discrepancy Process
- Discrepancy Resolution File Validations and Record Level Details
- Examples and Requests for Reconsideration
- Questions
- Resources
- Closing Remarks

Session Guidelines

- This is a 90-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

- The purpose of this presentation is to provide an overview of the discrepancy resolution process.
- This presentation will address:
  - Guidance for the discrepancy process, and
  - The timeline and requirements for submitting discrepancy files.

CSR Data Submission – Discrepancy Resolution Process Guidance

- CMS has previously released technical specifications on the discrepancy resolution process issuers must follow if they have a CSR discrepancy to report.
- Issuers seeking to file a discrepancy should use the "CSR Discrepancy Inbound Specification" for the 2017 Benefit Year and 2016 Prior Year Restatement document located on the CCIIO website and REGTAP.

  CCIIO website link also here: https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/CSR-Recon-Discrepancy-Reporting-BY2017.pdf

CSR Data Submission – Discrepancy Resolution Process

- CMS will only accept discrepancies for data that directly impacts the issuer's final calculated CSR amounts.
- Issuers should not file a benefit year 2017 restatement discrepancy for an issue for which the issuer previously filed a discrepancy.
- The discrepancy period for certain litigant issuers that submitted files by May 3rd is from May 21 until 11:59 p.m. ET on July 12, 2019.
- The discrepancy period for all other issuers that submitted files by May 31st or by June 7th if they received an extension is from June 12 until 11:59 p.m. ET on July 12, 2019.

CSR Data Submission - Discrepancy Resolution Process

- Any issuer that is considering filing an appeal must file a discrepancy in order to file an appeal. The discrepancy process also permits CMS to work with the issuer to resolve the dispute prior to an appeal.

CSR Data Submission Report

- If you have questions regarding data in your organization's data submission report, please contact CSRreconquestions@cms.hhs.gov.
- CMS can provide additional details about the calculations in your report, which may address any issue for which you may submit a discrepancy.

Discrepancy Reporting Requirements

CSR Data Submission – Discrepancy Resolution Process

- Issuers will submit discrepancy files to CMS.
- CMS will review and investigate discrepancy files on a rolling basis as files are received.
- CMS will follow up with issuers to communicate the discrepancy results.

CSR Data Submission – Discrepancy Resolution File Naming Convention

- Since discrepancy files will be submitted via Enterprise File Transfer (EFT), issuers must follow the EFT required file naming convention.
- The file name consists of the following sections:
  - Trading Partner (TP) Identifier (ID)
  - Application ID
  - Function Code
  - Date
  - Time
  - Environment Code
  - Direction
- Sample filename: **12345678.OPR.CSRDRI.D170710.T123136760.P.IN**

CSR Data Submission – Discrepancy Resolution File Naming Convention

- The discrepancy files are being processed by a different system than CSR data submission data and attestation files.
- Accordingly, please note the differences in Application ID and Function Code in the discrepancy file name:
  - Application ID - OPR
  - Function Code - CSRDRI

CSR Data Submission – Discrepancy Resolution File Format

- CSR data submission discrepancy files follow a similar format as prior year's discrepancy files.
- Discrepancy files will need to be submitted in a pipe-delimited format, using ASCII text and a CRLF as the line terminator.
- The file submitted by the issuer should have only one HIOS ID. Note: One discrepancy file will include records that apply to multiple benefit years, as applicable.
- If the issuer is submitting data for multiple HIOS IDs, the issuer will need to create a separate file for each HIOS ID.

CSR Data Submission – Discrepancy Resolution Process

- Issuers that identify data discrepancies related to Qualified Health Plan (QHP) ID errors (CSRIFIL67), Exchange Assigned Subscriber ID errors (CSRIFIL50), or errors related to the amount of Cost-sharing Reductions (CSRs) that an issuer provided at the policy level, including, for example, flawed issuer calculations or lost data, should utilize the discrepancy reporting process.
- Issuers will submit discrepancies in a pipe-delimited file format through EFT.

CSR Data Submission – Discrepancy Resolution File Format

- CSR data submission discrepancy files have three levels of records:
  - Issuer Summary (01) Records
  - Discrepancy Summary (02) Records
  - Policy Level (03) Records
- Some data elements in the discrepancy file are the same as those submitted in the CSR data submission data files, while others are unique data elements.

Discrepancy Resolution File Validations and Record Level Details

Discrepancy File Validations

CMS will send a rejection report to the issuer's EFT outbound folder, if the issuer's file contains any of the following errors:

- Across all the record levels, the count of the fields must match to the number specified in the inbound specifications.
- The record levels must be in the specified order - i.e. Record level 01 followed by 02 and 02 followed by the corresponding 03 records.
- The length of any single row must not exceed 4000 characters.
- Rows must end with an alphanumeric character.
- The Record Code must be 01, 02, or 03, only.
- Each Discrepancy Reason Type Code must match one of the values listed in the specifications (01, 02, 03, 04, 05, 06, 07, 08, 09, 10, 11, 12, 13).
- Across all 01 record code rows in one file, if more than one HIOS ID is found, the file will be rejected.
- If the HIOS ID is not applicable for the benefit year and state combination or the benefit year is not 2017 or 2018, the file will be rejected.

Discrepancy Resolution File Format – Issuer Summary (01) Record

- One record should be created for each issuer and benefit year.
- If an issuer is reporting multiple discrepancies for a benefit year, the information must be reported in the Discrepancy Summary (02) and Policy (03) level records that correspond to the HIOS ID and benefit year in the Issuer Summary (01) record.
- Issuer Summary (01) Records must have twelve fields.

Discrepancy Resolution File Format – Issuer Summary (01) Record

- If an issuer is reporting discrepancies for multiple benefit years, there should be an “01” level record for each benefit year.
- **Each Issuer Summary (01) record must be immediately followed by the Discrepancy Summary (02) and Policy Level (03) records that correspond to the HIOS ID and benefit year in the preceding Issuer Summary (01) record**.
- **Note:** Highlighted fields represent unique data elements not included in the CSR data submission files.

Discrepancy Resolution File Format – Issuer Summary (01) Record

Position	Field	Mandatory/ Optional for Rejected QHP/ Subscriber ID Discrepancy	Mandatory/ Optional for Data Discrepancy for Accepted Records	Data Type	Length	Notes
01	Record-Code	M	M	Text	2	Value: 01
02	Trading Partner ID	M	M	Text	5-10	The Trading Partner number assigned
03	Issuer State Code	M	M	Text	2	The 2-letter state code for issuer's state of licensure
04	HIOS ID	M	M	Numeric	5	The five-digit Health Insurance Oversight System (HIOS)-generated Issuer ID number
05	Benefit Year	M	M	Numeric	4	The calendar benefit year. Values are restricted to 2017 and/or 2018.
06	Total Amount of CSR Discrepancy (amount of CSR provided that is under Dispute)	M	M	Numeric	4-12	This is the total amount of the discrepancy for actual CSR provided for the HIOS ID and the benefit year (including all discrepancy reasons). Can be positive or negative. Positive suggests the issuer is indicating that it provided more valid CSR than was accepted by CMS.
07	Discrepancy Resolution POC First Name	M	M	Text	2-100	To identify the first name of the discrepancy reporting POC of the issuer
08	Discrepancy Resolution POC Last Name	M	M	Text	2-100	To identify the last name of the discrepancy reporting POC of the issuer
09	Discrepancy Resolution POC Email Address	M	M	Text	2-100	To identify the email address of the discrepancy reporting POC of the issuer
10	Discrepancy Resolution POC Organization Title	M	M	Text	2-100	To identify the organization of the discrepancy reporting POC of the issuer
11	Discrepancy Resolution POC Phone Number	M	M	Text	2-100	To identify the phone number of the discrepancy reporting POC of the issuer
12	Latest Accepted CSR Data Submission File Name	M	M	Text	2-100	File name of the latest accepted CSR data submission file the issuer submitted to MIDAS

Discrepancy Resolution File Format – Discrepancy Summary (02) Record

- **Records with Record Code 02 should be positioned in the text file immediately after the Issuer Year (01) record they are associated with.**
- Discrepancy Summary (02) records must have six fields.
- **Note:** Highlighted fields represent unique data elements not included in the CSR data submission files.

Discrepancy Resolution File Format – Discrepancy Summary (02) Record

Position	Field	Mandatory/ Optional for Rejected QHP/ Subscriber ID Discrepancy	Mandatory/ Optional for Data Discrepancy for Accepted Records	Data Type	Length	Notes
01	Record-Code	M	M	Text	2	Value: 02
02	Discrepancy Reason Type Code	M	M	Text	3	Three-character reason type code selected from the list in Appendix 1
03	Discrepancy Description	O	M	Text	0-500	Description of issue associated with Discrepancy Reason Type Code. Entire field must be enclosed in "double quotes". 500 character max. CMS encourages issuers to include a description and any applicable details that would be relevant to CMS's investigation of each discrepancy submitted.
04	Does this affect all reported Subscriber IDs?	M	M	Text	1	Y or N. If N, Issuers must submit a "03" level record below for each Subscriber Policy affected.
05	Number of Subscriber IDs affected	O	O	Numeric	1-10	Mandatory only if issuer answers N above. This count is not a count of unique subscriber IDs. Each time a Subscriber ID is submitted, count it. For example, if the same subscriber ID was submitted twice under two "03" policy level records in an issuer's CSR data submission, the count of the subscriber ID input in this field should be "2".
06	Amount of CSR Disputed for Discrepancy Reason Code (amount of CSR provided that is under dispute because of that discrepancy reason code)	M	M	Numeric	4-12	This is the total amount of the discrepancy for CSR provided that is associated with the specific Discrepancy Reason Type Code (defined in Appendix 1) only. Can be positive or negative. Positive suggests the issuer is indicating that it provided more valid CSR than was accepted by CMS.

Discrepancy Reason Type Code- Appendix 1 in Specification document

Discrepancy Category	*Discrepancy Reason Type Code*	*Discrepancy Reason Type Definition*
Subscriber/QHP ID Data Discrepancy	R01	Subscriber ID (issuer-submitted) was rejected by CMS (issuer received error code CSRIFIL50 for the Policy Detail (03) record with this Subscriber ID). This discrepancy reason type may only be used by FFM Issuers. Please DO NOT use R01 discrepancy code if you are changing any of the policy details (i.e. CSR provided amounts).
	R11	Subscriber ID (issuer-submitted) was rejected by CMS (issuer received error code CSRIFIL50 for the Policy Detail (03) record with this Subscriber ID). This discrepancy reason type may only be used by FFM Issuers. There is an UPDATED CSR provided for these subscribers.
	R12	Incorrect Subscriber ID: Issuer provided an incorrect subscriber ID that was rejected with error code CSRIFIL50. Issuer wishes to provide an updated subscriber ID (use "Updated Subscriber ID" field at record level 03, provide the prior subscriber ID in "Exchange Subscriber ID" field).
	R13	Issuer did not submit these subscriber IDs in its CSR data file submission to MIDAS and is submitting them for the first time.
	R02	QHP ID (issuer-submitted) was rejected by CMS (issuer received error code CSRIFIL67 for the Policy Detail (03) record with this Subscriber ID)
Data Discrepancy for Accepted Records	R03	HHS Processing Error: Contesting a processing error (submitted data file, file was rejected, not seeing anything in error report, or incorrect error codes generated in error report)
	R04	HHS Mathematical Error for Amount (HHS miscalculated CSR Provided or incorrect final calculated CSR amount stated for 2017 or 2018)
	R05	HHS Incorrect application of the relevant methodology
	R06	Issuer Processing Error: Reporting a processing error (submitted incorrect or incomplete information in the data file, or a claims processing error affected the amount of CSR provided that was reported in the data file)
	R07	Issuer Mathematical Error for Amount (Issuer reported incorrect amounts for the amounts paid for services or miscalculated CSR Provided)
	R08	Issuer Incorrect application of the relevant methodology (Issuer or its TPA failed to follow CMS guidance on re-adjudication of claims, or issuer used the incorrect methodology)
	R09	Claims data or policies submitted in the wrong benefit year
	R10	Other (Note: Please use the applicable discrepancy reason type code above for issues related to Exchange-assigned subscriber IDs.)

Discrepancy Resolution File Format – Policy Level (03) Record

- Issuers must populate Policy Level (03) records with the details (i.e., QHP IDs or Subscriber IDs) for each Discrepancy Summary (02) record that the issuer is filing a discrepancy for from their data file(s).

Discrepancy Resolution File Format – Policy Level (03) Record

- Policy level (03) records should be populated for each Issuer/Year/Discrepancy Reason that affects fewer than "All" Exchange Assigned Subscriber IDs.
- **Records with Record Code 03 should be positioned in the text file immediately after the Discrepancy Year (02) record they are associated with.**
- Policy level (03) records must have eight or nine fields.

Discrepancy Resolution File Format – Policy Level (03) Record

Position	Field	Rejected QHP/ Subscriber ID Discrepancy	Data Discrepancy for Accepted Records	Data Type	Length	Notes
01	Record-Code	M	M	Text	2	Value: 03
02	Exchange Subscriber ID Exists	M	O	Text	1	If the issuer is aware of a Federally-facilitated Marketplace (FFM) Exchange-Assigned Subscriber ID that has been assigned to the subscriber, input "Y" in this field. If a subscriber ID was never assigned by the FFM for this subscriber (but the subscriber is a valid enrollee on the FFM for the applicable benefit year), then the issuer should input "N" in this field. State-based Marketplace (SBM) Issuers should populate this field with "N".
03	Exchange Subscriber ID	M	M	Text	10	The subscriber ID assigned by the Exchange. For SBMs, issuers should list the SBM-assigned Subscriber ID if it was reported in the "03" level of the issuer's original CSR reconciliation data submission.
04	QHP ID	M	M	Text	16	Enter the 16-digit HIOS-generated qualified health plan (QHP) ID number. This includes the 14-digit standard plan ID plus the 2-digit variant ID.
05	Exchange Assigned Policy ID	M	M	Text	1-20	Policy ID uniquely identifying an individual policy for this Subscriber and QHP ID. This should match the Exchange-Assigned Policy ID listed on 834's from CMS and the Policy ID submitted by issuers for the Enrollment Reconciliation process.
06	Policy Benefit Start Date	M	M	Date	8	First date that the subscriber enrolled in this policy. Policy Benefit Start Date should be in MMDDYYYY format. Note: CMS does not validate this value but it may be used in CMS's investigation of the discrepancy.

Discrepancy Resolution File Format – Policy Level (03) Record (cont.)

07	Policy Benefit End Date	M	M	Date	8	Date that the subscriber's enrollment in this policy ended. Policy Benefit End Date should be in MMDDYYYY format. Note: CMS does not validate this value but it may be used in CMS's investigation8 of the discrepancy.
08	Amount of CSR Provided Disputed for the Policy	M	M	Numeric	4-12	This is the amount of the discrepancy for CSR provided that is associated with the specific Discrepancy Reason Type Code (defined in Appendix 1) and this policy record only. Can be positive or negative. Positive suggests the issuer is indicating that it provided more valid CSR than was accepted by CMS.
09	Updated Subscriber ID	O	O	Text	10	Optional field to provide a corrected Exchange Subscriber ID. This field should only be used if an incorrect ID was submitted in the original CSR Reconciliation submission.

Note: Highlighted fields represent unique data elements not included in the CSR data submission files.

CSR Data Submission Discrepancy File Format Sample #1 with an Issue

01|123456|AA|12345|2015|100|a|c|abc@gmail.com|d|1234567890|last_file_2015
02|R01|"Manual Enrollment"|N|2|50
03|N|1234567890|123456789012345|abcdefgh|25.00
03|Y|2234567890|123456789012345|abcdefgd|25.00
02|R06|"Lost Claims"|N|1|50
03| |1234567890|123456789012345|abcdefgh|50.00
01|123456|AA|12345|2016|200|a|c|abc@gmail.com|d|1234567890|last_file_2016
02|R12|"Member ID provided instead of subscriber id"|N|2|200
03|Y|1234567890|123456789012345|abcdefgh|100.00|1234567891
03|Y|2234567890|123456789012345|abcdefgd|100.00|2234567891

Issue: The 03 records do not have the correct field count. Policy Start and End Date fields are missing from the 03 records.

CSR Data Submission Discrepancy File Format Sample #2 with an Issue

01|123456|AA|12345|2016|200|a|c|abc@gmail.com|d|1234567890|last_file_2016

02|R21|"Member ID provided instead of subscriber id"|N|2|200

03|Y|1234567890|123456789012345 6|abcdefgh|01012016|12312016|100.00|123456 7891

03|Y|2234567890|123456789012345 6|abcdefgd|01012016|12312016|100.00|223456 7891

Issue: Invalid Discrepancy Reason Type Code

CSR Data Submission Discrepancy File Format Sample #3 with an Issue

01|123456|AA|12345|2016|200|a|c|abc@gmail.com|d|1234567890|last_file_2016

02|R12|"Member ID provided instead of subscriber id"|N|2|200

03|Y|1234567890|123456789012345 6|abcdefgh|01012016|12312016|100.00|1234567891

04|Y|2234567890|123456789012345 6|abcdefgd|01012016|12312016|100.00|2234567891

Issue: Invalid Record Code

CSR Data Submission Discrepancy File Format Sample #4 with an Issue

01|123456|AA|12345|2015|100|a|c|abc@gmail.com|d|1234567890|last_file_2015
02|R01|"Manual Enrollment"|N|2|50
03|N|1234567890|123456789O123456|abcdefgh|01012015|12312015|25.00
03|Y|2234567890|123456789O123456|abcdefgd|01012015|12312015|25.00
01|923456|AA|92345|2015|150|a|c|abc@gmail.com|d|1234567891|last_file_2015_2
02|R01|"Manual Enrollment"|N|2|150
03|N|3234567890|123456789O923456|abcdefgh|01012015|12312015|100.00
03|Y|4234567890|123456789O923456|abcdefgd|01012015|12312015|50.00

Issue: More than one HIOS ID is included in the discrepancy file

CSR Data Submission Discrepancy File Format Sample #5 with an Issue

01|123456|AA|12345|2015|100|a|c|abc@gmail.com|d|1234567890|last_file
02|R01|"Manual Enrollment"|N|2|50
02|R06|"Lost Claims"|N|1|50
03||1234567890|123456789O123456|abcdefgh|01012014|12312014|50.00
03|N|1234567890|123456789O123456|abcdefgh|01012015|12312015|25.00
03|Y|2234567890|123456789O123456|abcdefgd|01012015|12312015|25.00

Issue: The records are not listed in the correct order

CSR Data Submission Discrepancy File Format Sample #6 with an Issue

01|123456|AA|12345|2015|100|a|c|abc@gmail.com|d|1234567890|last_file
02|R01|Manual Enrollment|N|2|50
03|N|1234567890|123456789O123456|abcdefgh|01012015|12312015|25.00
03|Y|2234567890|123456789O123456|abcdefgd|01012015|12312015|25.00
02|R06|Lost Claims|N|1|50
03||1234567890|123456789O123456|abcdefgh|01012014|12312014|50.00

Issue: Discrepancy descriptions must be enclosed in double quotes (i.e. “Lost Claims”)

HTTPS://WWW.REGTAP.INFO/

CSR Data Submission Discrepancy File Format Sample #7 – No Issues

01|123456|AA|12345|2015|100|a|c|abc@gmail.com|d|1234567890|last_file_2015
02|R01|"Manual Enrollment"|N|2|50
03|N|1234567890|123456789O123456|abcdefgh|01012015|12312015|25.00
03|Y|2234567890|123456789O123456|abcdefgd|01012015|12312015|25.00
02|R06|"Lost Claims"|N|1|50
03||1234567890|123456789O123456|abcdefgh|01012014|12312014|50.00
01|123456|AA|12345|2016|200|a|c|abc@gmail.com|d|1234567890|last_file_2016
02|R12|"Member ID provided instead of subscriber id"|N|2|200
03|Y|1234567890|123456789O123456|abcdefgh|01012016|12312016|100.00|123456789 1
03|Y|2234567890|123456789O123456|abcdefgd|01012016|12312016|100.00|223456789 1

CSR Data Submission – Discrepancy Resolution Decision

- CMS will send Discrepancy Resolution Decisions after investigating all discrepancies within a company.
- Discrepancy Resolution Decisions will include information about next steps and how to file a request for reconsideration.
  - Issuers with certain approved discrepancies* will be asked to resubmit full and complete updated data and attestation files to MIDAS in order for CMS to complete discrepancy processing.
  - MIDAS will automatically reprocess an issuer's most recent data file if the issuer has an approved R01 or R02 discrepancy (and no other approved discrepancies that would require the issuer to update and resubmit their data file).
  - CMS will send revised reports and process charge adjustments, as applicable, after the above steps are completed.

*Discrepancy reason type codes R03, 04, 05, 06, 07, 08, 09, 10, 11, 12, or 13.

CSR Data Submission – Requests for Reconsideration

- Issuers may request reconsideration of the calculated CSR amount within 60 days of the date of the discrepancy resolution decision to contest a processing error by HHS, HHS's incorrect application of the relevant methodology, or HHS's mathematical error.
- CMS will provide additional guidance at a later date on the request for reconsideration process of final calculated CSR amounts.

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 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

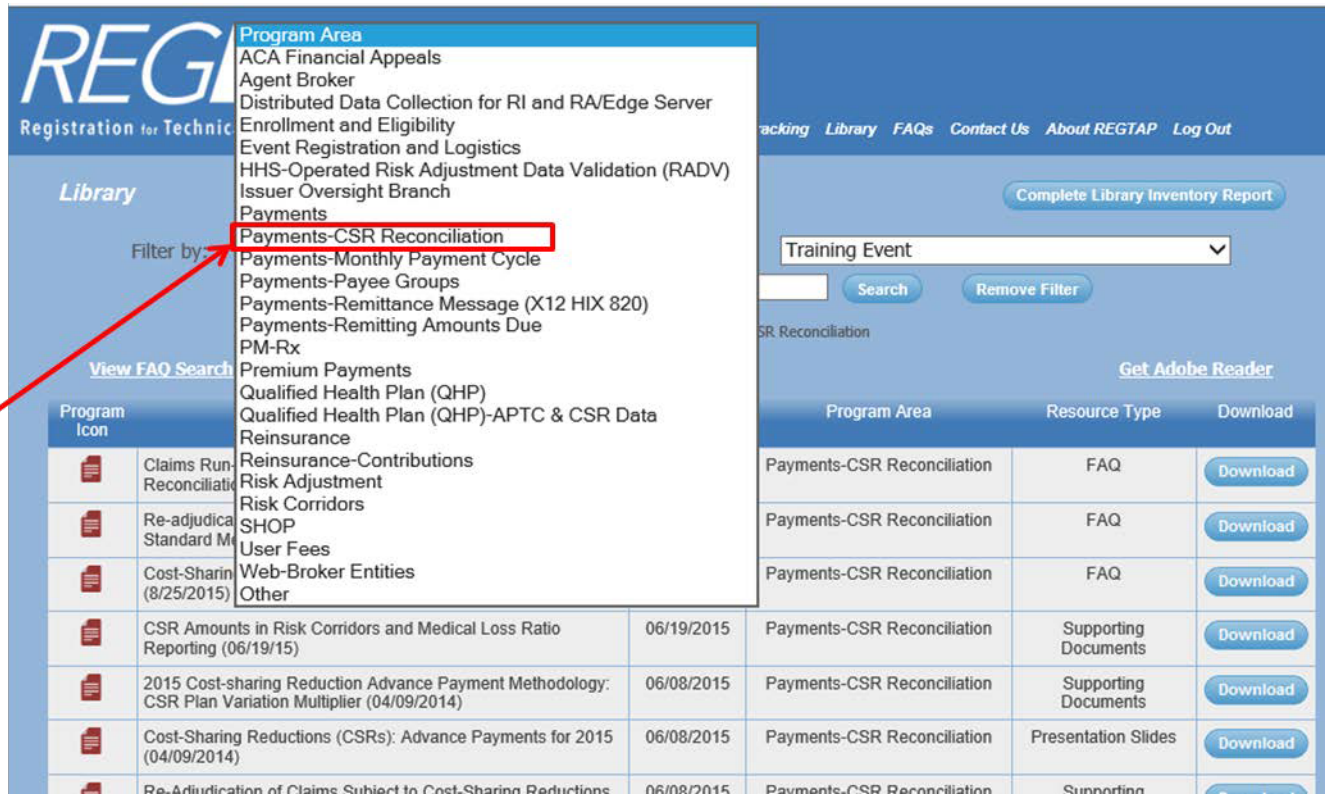
Resources

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 Data Submission Documents in REGTAP

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

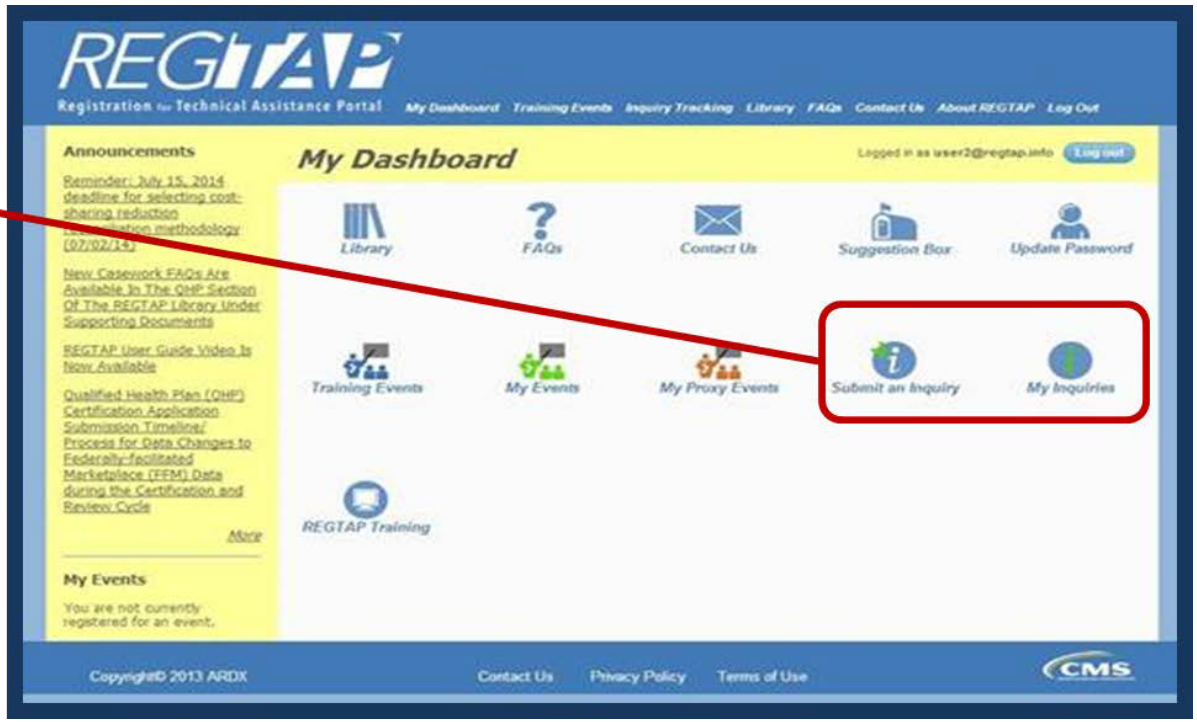
Under Program Area, select "Payment-CSR Reconciliation"



Inquiry Tracking and Management System (ITMS)

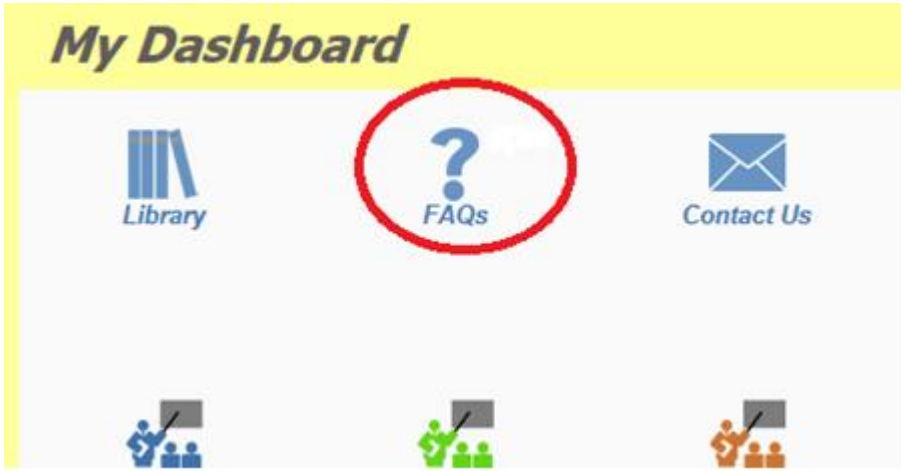
Stakeholders can submit inquiries to https://www.REGTAP.info through ITMS.

Select 'Submit an Inquiry' from My Dashboard.



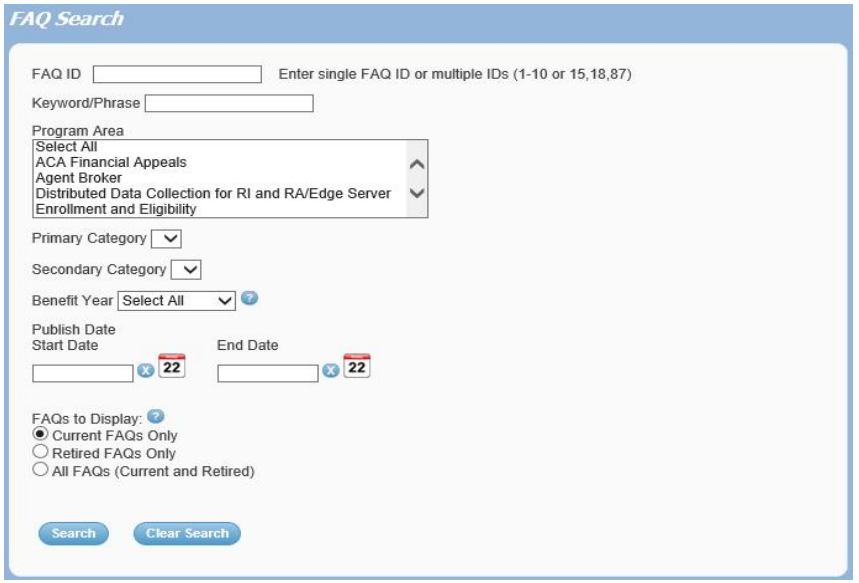
Note: Enter only one (1) question per submission.

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/



HTTPS://WWW.REGTAP.INFO/

Closing Remarks

HTTPS://WWW.REGTAP.INFO/