FM Payment Processing I:

July – September Payment Cycles, SBM Workbook Submission Updates, CSR Advance Payment Updates and Payment Dispute Updates

July 11, 2016

FM Payment Processing I

HTTPS://WWW.REGTAP.INFO

Agenda

- Session Guidelines
- July – September Payment Cycles
- Updated Process for Testing of Automated Workbook Submission Process for SBM Issuers
- CSR Advance Payments for the 2014 and 2015 Benefit Years
- Payment Dispute Updates
- Resources
- Closing Remarks

Session Guidelines

- This is a 90-minute content session.
- Documented Q&As will be posted in the coming weeks.
- For questions regarding logistics and registration, contact the Registrar at: (800) 257-9520.

FM Payment Processing I

- Financial Management (FM) Payment Processing I will provide information related the 2016 transition to Policy-based Payments (PBP) and the Dispute Reporting Process, in addition to providing technical guidance related to the Federally-facilitated Marketplace (FFM) payment process.
- As part of this series, Centers for Medicare & Medicaid Services (CMS) will conduct content webinars every other Monday from 2:00 p.m. to 3:30 p.m. ET.

FM Payment Processing I: July 2016

Day of Session	Date of Session	Time	Session Type
Monday	July 11, 2016	2:00 p.m. – 3:30 p.m. ET	Webinar
Monday	July 25, 2016	2:00 p.m. – 3:30 p.m. ET	Webinar
Monday	August 8, 2016	2:00 p.m. – 3:30 p.m. ET	Webinar
Monday	August 22, 2016	2:00 p.m. – 3:30 p.m. ET	Webinar

Points of Contact

- CMS directs Issuers to contact the Federal Enrollment and Payment System (FEPS) Helpdesk with technical questions or issues. Issuers can contact the FEPS Helpdesk at the CMS_FEPS@cms.hhs.gov email address.
- CMS directs Issuers to contact the Marketplace Payments Team with questions related to the Manual Payment Process. Issuers can contact Marketplace Payments at the marketplacepayments@cms.hhs.gov email address.
- CMS directs Issuers to contact the Financial Management Coordination Center (FMCC) with questions regarding the PBP process. Issuers can contact the FMCC at the FMCC@cms.hhs.gov email address.
- CMS directs Issuers to contact the Enrollment Reconciliation and Resolution (ER&R) contractor with questions regarding the discrepancy reporting process, as well with dispute form submissions. Issuers can contact the ER&R contractor at the errsupportcenter@cognosante.com email address.

PPR and HIX 820 File Issues

Please follow the escalation path below for issues with File Transfer Protocol (FTP) or locating the monthly Preliminary Payment Report (PPR) and HIX 820 payment files:

- **PPR**
  - Contact the FMCC
    - Email: FMCC@cms.hhs.gov
- **HIX 820**
  - Contact the CMS Help Desk and request a Remedy Ticket for the issue. The Help Desk will assign the ticket to the appropriate support team who will reach out to Issuers to resolve.
    - Email: CMS_FEPS@cms.hhs.gov

Contacting FMCC

When contacting the FMCC, Issuers should include their five (5)-digit Health Insurance Oversight System (HIOS) ID and their seven (7)-character Payee ID, along with their request.

Additional Information

- Additional information related to the PBP transition is available in the Registration for Technical Assistance Portal (REGTAP) Library at the following links:
  - FM 2015 – 2016 Issuer Transition Guide, Version 4.4
    - https://www.regtap.info/uploads/library/FT_HIX820_Issuer_Transition_Guide_V4_4_5CR_032416.docx
  - PBP Temporary Adjustment Reconciliation Methodology
    - https://www.regtap.info/uploads/library/FT_MPP_PBP_TempAdjustRecon_121815_v1_5CR_122115.pdf
  - May 2, 2016 Payment Bulletin
    - https://www.regtap.info/uploads/library/FT_PaymentBulletin_v1_5CR_051016.pdf
  - PBP May Payment Back-out Example Workbook
    - https://www.regtap.info/uploads/library/FT_PBP_May_Reversals_050216_5CR_050216.xlsx

Dispute Resolution Form

The latest version (Version 2) of the Dispute Resolution Form is available on REGTAP at the following link: https://www.regtap.info/uploads/library/FT_PPR_820_Dispute_Form_v2_052616_5CR_060616.xlsx

July – September 2016 Payment Cycles

CENTERS FOR MEDICARE & MEDICAID SERVICES

Reminder: Workbook Submissions Ending for Some Issuers

2015-Only and FFM-Only Issuers will not receive workbooks for August Payment

- **2016 FFM Issuers will be paid based on Policy-Based Payments**
- **CMS is reviewing 2015 data and will have a final 2015 restatement later in the year**

July 2016

Sun	Mon	Tues	Wed	Thurs	Fri	Sat
27	28	29	30	5	1	2
3	4 Independence Day	5 Data Matching Outreach File*	6	7	8	9
10	11 Payees who are Net Negative receive July Dunning Letter[1] (11–13)	12	13 July 2016 Preliminary Payment Reports sent to Payees. (13–15)	14	15 FFM Updated 2016 2016 Pre-Audit Extract (6:00 p.m. ET)	16 SBM Issuers: August 2016 Manual Process Workbooks (First submission window). Due 7/19 @ 12:00 p.m. ET
17 SBM Issuers: August 2016 Manual Process Workbooks (First submission window). Due 7/19 @ 12:00 p.m. ET (17–19)	18	19	Delivery to Issuers: • 2016 Pre-Audit File • 2016 Orphan Finder MISC File • 2016 Collapsed CIC Matching File SBM Issuers: August 2016 Manual Process Workbooks (Resubmission window). Due 7/22 @ 12:00 p.m. ET (20–22)	Payees receive July Payments[1] 2016 Recon Inbound Due 3:00 p.m. ET	22	23
24	25	26 Delivery to Issuers: • 2016 Recon Outbound Previous Years Issuer Dispute Submission Window (26–29)	Delivery to Issuers: • 2016 Recon Outbound	28	29 Payees receive July HIX 820	30
31	August 1	2	3	4	5	6

August 2016

Sun	Mon	Tues	Wed	Thurs	Fri	Sat
July 31	1	2	3	4 **Data Matching Outreach File***	5	6
7	8	9	10	11 Payees who are Net Negative receive August Dunning Letter[1]	12 Payees who are Net Negative receive August Dunning Letter[1]; August 2016 Preliminary Payment Reports sent to Payees.	13 August 2016 Preliminary Payment Reports sent to Payees.
14 August 2016 Preliminary Payment Reports sent to Payees.	**FFM Updated 2016**; **2016 Pre-Audit Extract (6:00 p.m. ET)**; August 2016 Preliminary Payment Reports sent to Payees.	SBM Issuers: September 2016 Manual Process Workbooks (First submission window). Due 8/19 @ 5:00 p.m. ET	SBM Issuers: September 2016 Manual Process Workbooks (First submission window). Due 8/19 @ 5:00 p.m. ET	SBM Issuers: September 2016 Manual Process Workbooks (First submission window). Due 8/19 @ 5:00 p.m. ET; **2016 Recon Inbound Due 3pm (New Format)**	Delivery to Issuers: • 2016 Pre-Audit File (New Format) • 2016 Orphan Finder MISC File • 2016 Collapsed CIC Matching File SBM Issuers: September 2016 Manual Process Workbooks (Resubmission window). Due 12:00 p.m. ET	20 SBM Issuers: September 2016 Manual Process Workbooks (Resubmission window). Due 12:00 p.m. ET
21 SBM Issuers: September 2016 Manual Process Workbooks (Resubmission window). Due 8/23 @12:00 p.m. ET	Payees receive August Payments[1]; SBM Issuers: September 2016 Manual Process Workbooks (Resubmission window). Due 8/23 @12:00 p.m. ET	23 SBM Issuers: September 2016 Manual Process Workbooks (Resubmission window). Due 8/23 @12:00 p.m. ET; Delivery to Issuers: • 2016 Recon Outbound **(New Format)**	24	25	26	27
28 **Note: Data Matching Outreach File delivery dates are approximate*	29	30	31 Payees receive August HIX 820	1	2	3

September 2016

Sun	Mon	Tues	Wed	Thurs	Fri	Sat
August 28	29	30	31	1	2	3
4	5 *Labor Day*	6 *Data Matching Outreach File**	7	8	9 **Payees who are Net Negative receive September Dunning Letter[1]**	10
11	12 **Payees who are Net Negative receive September Dunning Letter[1]** **Delivery to Issuers:** • 2015 Pre-Audit File	13 **September 2016 Preliminary Payment Reports sent to Payees.**	14	**FFM Updated 2016** **2016 Pre-Audit Extract (6:00 p.m. ET)**	16 **SBM Issuers: October 2016 Manual Process Workbooks(First submission window). Due 9/19 @ 5:00 p.m. ET** **Delivery to Issuers:** • 2014 Pre-Audit File	17
18 **SBM Issuers: October 2016 Manual Process Workbooks (First submission window). Due 9/19 @ 5:00 p.m. ET**	19	20 **SBM Issuers: October 2016 Manual Process Workbooks (Resubmission window). Due 9/23 @ 12:00 p.m. ET**	**Delivery to Issuers:** • 2016 Pre-Audit File • 2016 Orphan Finder MISC File • 2016 Collapsed CIC Matching File	**Payees receive September Payments[1]** **2016 Recon Inbound Due 3:00p.m. ET**	23	24
25	26	27 **Delivery to Issuers:** • 2016 Recon Outbound	28	29	30 **Payees receive September HIX 820**	1

2016 Payment Cycle Manual Workbook Submission Deadlines

Payment Cycle	Initial Submission Deadline	Final Submission Deadline
August	7/19/2016	7/22/2016
September	8/18/2016	8/23/2016
October	9/19/2016	9/22/2016
November	10/18/2016	10/21/2016
December	11/18/2016	11/22/2016

Updated Process for Testing of Automated Enrollment & Payment Workbook Submission Process for SBM Issuers

New Workbook Submission Process for Production

Current Process:

- Currently, all Issuers email their Manual Workbooks to the following CMS email address: MarketplacePayments@cms.hhs.gov.

New Process:

- CMS will be moving from using an Access Database to aggregate Issuer Workbooks to an automated Oracle Database solution.
- SBM Issuers are REQUIRED to submit the August workbooks via EFT for the September payment cycle.
- SBM Issuers have the *option* to submit July workbooks via EFT for the August payment cycle.
- Please coordinate the workbook file EFT upload with your organizations EFT point of contact (POC).
- Issuers must use new EFT Function Codes (defined on following slide) to transfer files via EFT to CMS.

New Workbook Submission Process - New Function Codes

File Direction	Function Code	File Name
Issuers to CMS	**WBKI1A**	**File Name:** <TradingPartnerID>.OPR.WBKI1A.DYYMMDD.THHMMSSmmm.**T**.IN **Example:** <TPID>.OPR.WBKI1A.D160415.T142521001.**T**.IN **Please note:** All Issuer workbooks should be added to a zip file and the zip file should be renamed with a .IN file extension using the file naming format shown above where DYYMMDD (Y=Year, M=Month, D=Day) is the current date and the THHMMSSmmm (H=Hour, M=Minute, S=Second, and m=Millisecond) is the time as shown in the sample name above. NOTE: Milliseconds can be entered as “000.”
CMS to Issuers	**WBKO1A**	**File Name:** <TradingPartnerID>.WBKO1A.DYYMMDD.THHMMSSmmm.**T**.OUT **Example:** <TPID>.WBKO1A.D160415.T142521001.**T**.OUT **Please note-in order to save and open this file:** This is a zip file and should be renamed from a file with a .OUT extension to a .ZIP extension in order to open it. **Renaming & Saving Example:** <TPID>.WBKO1A.D160415.T142521001.**T**.OUT.ZIP

Testing EFT Process Details

In order for you to send the workbooks, you would need to coordinate the workbook file upload (with the required naming convention defined below) with your organization's EFT POC and use the existing tested EFT process established with CMS.

Files to Submit: Please use the workbook submitted in June (July 2016 Payment Cycle) as the TEST file.

Testing Submission Window Options (Please select 1):

1) July 6th–15th

Or

2) July 25th–Aug 4th

Testing EFT Process Details
(Continued)

<u>File Naming Convention for TEST Files:</u>

1. Use workbook submitted in <u>June (July 2016 Payment Cycle)</u> as a TEST file.
2. Zip the workbook (or workbooks if you are submitting multiple) and submit ONLY ONE Zipped File
   - Zipped files should *not* be password protected.
   - If you are using a single TPID with multiple Issuer IDs, submit ONLY ONE (1) zipped file with all of the Issuer ID files included.
3. RENAME the Zip file as follows, with a .T.IN extension (.T=TEST File)
4. Make sure the File TYPE is a .IN File not an XLSX or XLSM File

Name	Date modified	Type	Size
TradingPartnetID.OPR.WBKI1A.D160607.T101235000.P.IN	7/7/2016 10:57 AM	IN File	50,532 KB
Workbook.xlsx	5/18/2016 10:32 PM	Microsoft Office E...	50,576 KB

After renaming zip to .P.IN file type should show as "IN File"

Testing EFT Process Details

(Continued)

5. Function Code: **WBKI1A** (**WBK**=Workbook **I**=Inbound **1A**)
6. Zip File Name: <TradingPartnerID>.OPR.WBKI1A.DYYMMDD.THHMMSSmmm.T.IN
7. EFT the TEST file to CMS using the existing established CMS EFT procedures
   5. Use the same location used for your current EFT file submissions, which would typically be your eft.feps.cms.gov/inbound30 upload folder.
8. If you are *RE-SUBMITTING* zipped files, be sure to update your filename timestamp for your NEW Zip File (<TradingPartnerID>.OPR.WBKI1A.DYYMMDD.**<u>THHMMSSmmm</u>**.T.IN)
9. If any Issuer submits a file with an incorrect file name, the file will end up in their ‘SPOE /outbound30/error/’ folder. The Issuer will not receive a notification email from CMS.
10. CMS recommends that Issuers check the SPOE’s error folder following file submission to ensure the file was submitted and did not end in delivery failure.

Enrollment and Payment Workbook Submission using EFT

Key Activities for ***EFT Testing***	
Submit June workbooks for July Cycle	July 6th – 15th or July 25th - August 4th
CMS sends EFT confirmation of receipt	Within 24 hours
Key Activities for *Production*	
Submit July workbooks for August Cycle	July 19th – 22nd
Submit August workbooks for September Cycle	August 18th – 23rd
CMS sends 1 of these types of files: 1. Acceptance File 2. Cursory Review File 3. Validation Review File	Within 24 hours

CSR Advance Payments for the 2014 and 2015 Benefit Years

CSR Advance Payments for the 2014 and 2015 Benefit Years

- On June 30, 2016, CMS emailed Issuers a summary of reconciled cost-sharing reduction (CSR) amounts for the 2014 and 2015 Benefit Years.
- CMS will pay or collect these amounts for most Issuers in the August payment cycle:
  - If the amount of actual CSRs that an Issuer provided exceeded the amount of advance CSR payment that the Issuer received from CMS for the applicable benefit year, CMS will make a payment to the Issuer of an amount equal to the excess in the August payment cycle.
  - If the amount of actual CSRs that an Issuer provided was lower than the amount of advance CSR payment that the issuer received from CMS for the applicable benefit year, CMS will charge the issuer the difference.
  - CSR reconciliation payments and charges will have a Program Level code CSRN in the 2300 Loop on the 820
    - 2014 reconciliation and charges and payments will show payment period 12012014-12312014
    - 2015 reconciliation and charges and payments will show payment period 12012015-12312015
    - No 2100 loop on the 820 for CSR recon payments and charges (policy-level detail will not be included)
  - CMS will collect charges through the netting process. If total charges are greater than total payments for the August payment cycle, the Issuer will receive a dunning letter for the amount of the difference.

CSR Advance Payments for the 2014 and 2015 Benefit Years (continued)

- CMS will hold CSR reconciliation **payments** for Issuers that either:
  - 1) Have not successfully attested to their CSR reconciliation data files, or
  - 2) Have been identified as a significant outlier based on a comparison of CSR provided (as reported by the Issuer) and EDGE server risk scores for the Issuer's Marketplace business.
- These Issuers will receive CSR reconciliation payments when they have successfully submitted an attestation and/or Issuers' data anomalies have been resolved.
- If these Issuers owe a charge as a result of CSR reconciliation, the **charges will be collected** in the August payment cycle. Issuers may be subject to future audit if Issuers' data anomalies are not resolved.

Payment Dispute Updates

Payment Disputes Updates

- Disposition / Detail Code List v3
- Payment Dispute Form Reminders
- Re-Dispositioning

Disposition / Detail Code Updates

- CMS will release a link that will allow Issuers to access the latest Dispute Disposition and Detail Code List (v3) at a later date.

Disposition / Detail Code Updates

- New Dispute Disposition Code: R9
- New Detail Code: PD522
- Issuers may see these codes as an update to disputes previously reported as In Process.

R9	Policy Number Mismatch
PD522	On the Issuer's RCNI, the Issuer's value does not match the FFM's value for Exchange Assigned Policy ID. Please check the RCNO to determine which policy needs to be canceled or effectuated accordingly.

Other Detail Code Updates

FV201	Payment Dispute based on a HIX 820 cannot dispute Total Premium Amount or User Fee Amount.	R2
FV202	Coverage Period Start Date and Coverage Period End Date are not in the same calendar month.	R2
FV203	Any Coverage Date (if present) must be greater than or equal to 20160101.	R2
FV204	Payment cycle month must be greater than or equal to 201601.	R2
FV205	The Issuer Coverage Period End Date must be equal to or later than the Issuer Coverage Period Start Date (if present).	R2
FV206	The FFM Coverage Period End Date must be equal to or later than the FFM Coverage Period Start Date (if present).	R2

Payment Dispute Form Reminders

Pre-Audit Reminder

- Issuers will only receive payment for policies that have been identified as effectuated in the most recent Pre-Audit file.
  - Field 11, Transaction Type Code – 1 (Active, open-ended coverage) or 4 (Terminated)
  - Field 67, Confirmation Indicator = Y
  - The combination of a Transaction Type Code = ‘1’ or ‘4’, and a Confirmation Indicator = ‘Y’ indicates an effectuated policy in the FFM

Payment Dispute Form Reminders (continued)

Pre-Audit Reminder (continued)

- Effectuated policies in the Pre-Audit file convey the most current information the FFM has for subscribers including:
  - Exchange Assigned Policy Number (Field 68)
  - Applied APTC Amount (Field 70), if applicable
  - CSR Amount (Field 73), if applicable
  - Total Premium Amount (Field 76)

Payment Dispute Form Reminders (continued)

Submitting Payment Disputes

- A significant number of Issuers have yet to submit a payment dispute.
- Issuers are encouraged to reach out to the FMCC (Financial Management Coordination Center) help desk at fmcc@cms.hhs.gov with any:
  - Questions or concerns around the payment dispute process
  - Requests for technical assistance
  - Issues submitting a file
- CMS automatically identifies disputes that will be corrected through timing or are not consistent with the Issuer’s recon file.
  - Issuers do **not** need to conduct these checks before submitting
  - Submitting large volumes of disputes will not delay response

Re-Dispositioning

- Semi-Monthly reports created on 1st and 16th of each month (next will be distributed on 7/18)
- Includes 4 tabs:
  - Enrollment Summary
  - Enrollment Disputes
  - Payment Summary
  - Payment Disputes
- The Payment Disputes tab is populated only for Issuers who have disputes that have had a change in disposition status since the preceding Semi-Monthly Issuer Report.
- Issuers should refer to the Semi-Monthly Issuer report to see if there has been a change in disposition status since the initial response file was received from the ERR Contractor.

Re-Dispositioning (continued)

- The next semi-monthly report will show:
  - Payment disputes with a new C5 (Already Corrected by Adjustments) disposition
  - Payment disputes with a new C2 (Timing issue – Update planned for next cycle) disposition
  - Payment disputes that used to have an R3 (FFM Fields on Dispute Form Do Not Match with PPR/820) disposition will have new dispositions
  - Payment disputes with a new R2 (Record Does Not Meet Dispute Requirements) disposition
  - Payment disputes with a new R9 (Policy Number Mismatch) disposition

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*

Acronyms

Acronym	Definition
DSH	Data Services Hub
EDI	Electronic Data Interchange
EPS	Enrollment and Payment System
FFM	Federally-facilitated Marketplace
FMCC	Financial Management Coordination Center
HIOS	Health Insurance Oversight System
HIX	Health Insurance Exchange
PBP	Policy-based Payments
PPR	Preliminary Payment Report
PSV	Pipe-separated value
SBM	State-based Marketplace
SHOP	Small Business Health Options Program

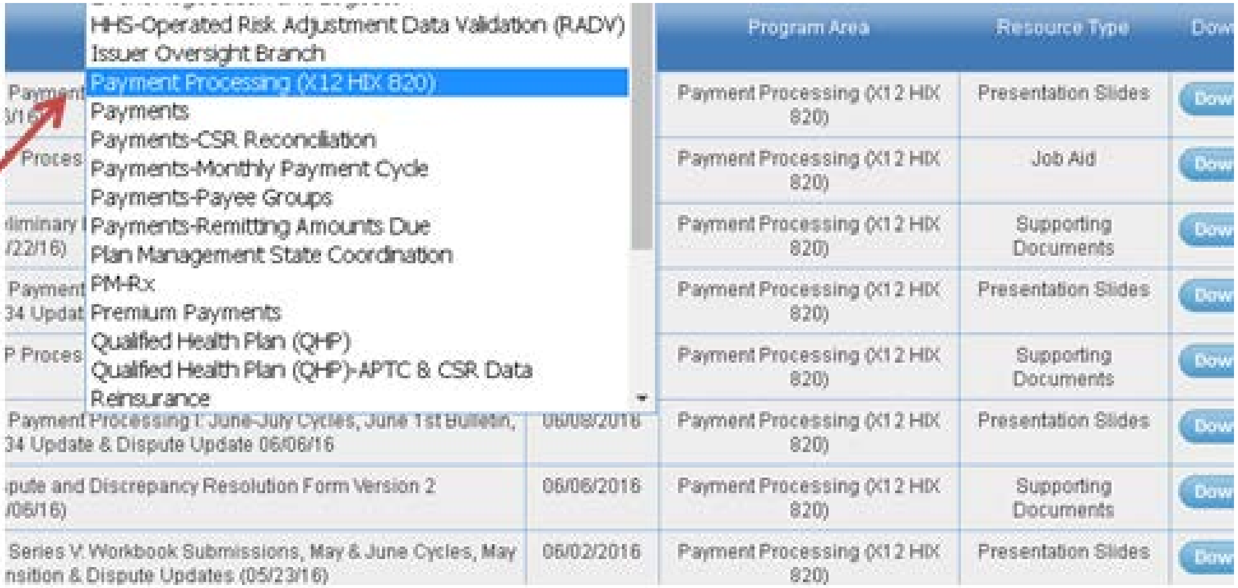
Resources

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/
ASC X12 Store	http://store.x12.org/store/health-insurance-exchanges
Registration for Technical Assistance Portal (REGTAP) - presentations, FAQs	https://www.REGTAP.info

Document Location

Additional Materials for FM Payment Processing I are available in the REGTAP Library at https://www.REGTAP.info

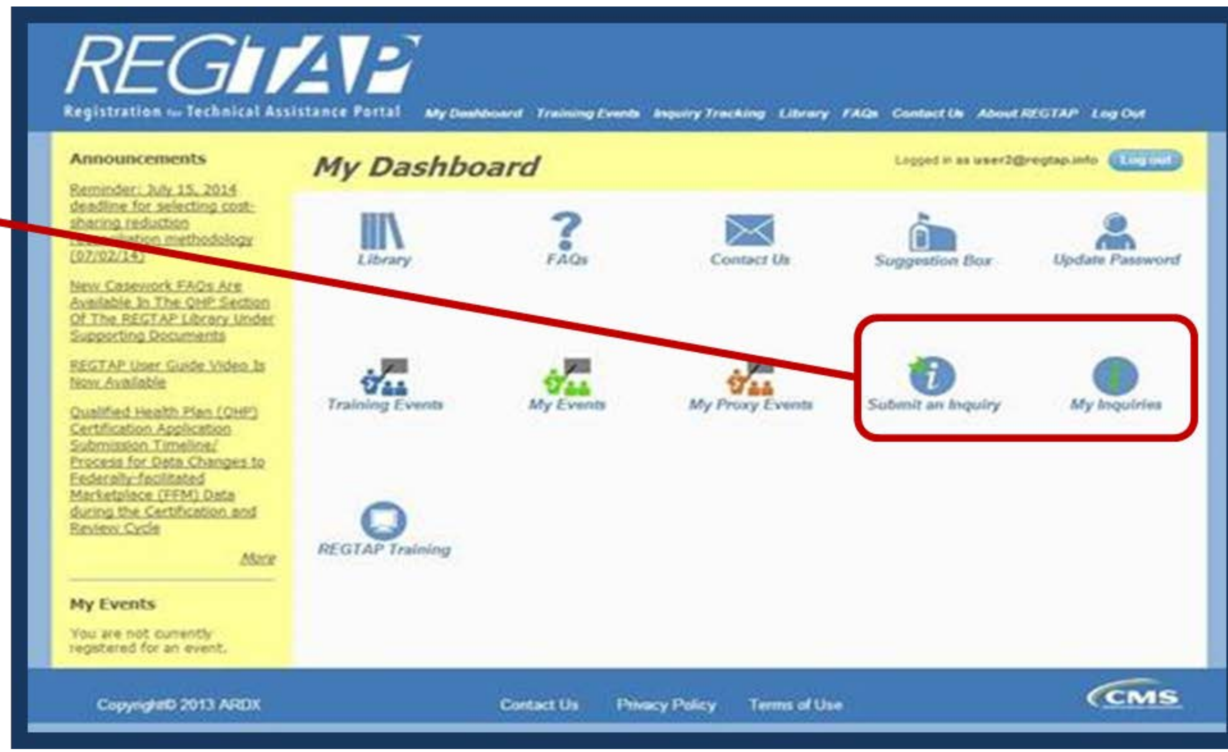
Under Program Area, select "Payment Processing (X12 HIX 820)"



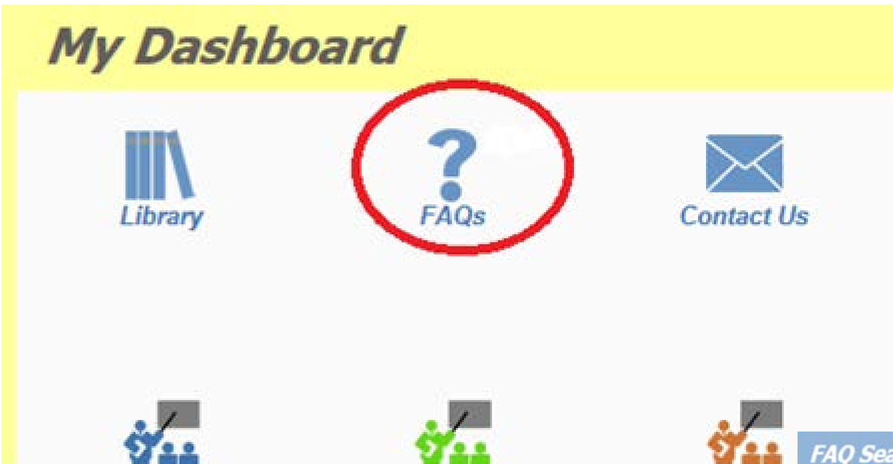
Inquiry Tracking and Management System (ITMS)

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

Select “Submit an Inquiry” from My Dashboard.

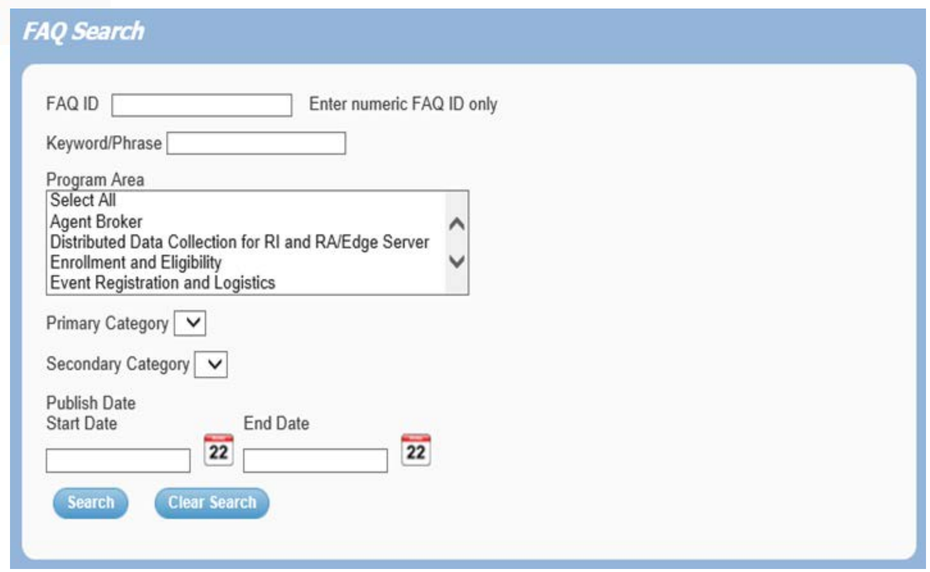


FAQ Database on REGTAP



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